

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NSPS for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal), EPA ICR Number 0649.13, OMB Control Number 2060-0106

**1(b) Short Characterization/Abstract**

The New Source Performance Standards (NSPS) for Metal Furniture Coating were proposed on November 28, 1980, promulgated on October 29, 1982, and most-recently revised on October 17, 2000. These regulations apply to 1each metal furniture surface coating operation in which organic coatings are applied (greater than 3,842 liters of coating per year), commencing construction, modification or reconstruction after November 28, 1980. This information is being collected to assure compliance with 40 CFR Part 60, Subpart EE.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain the file for at least two years following the generation date of such reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

The “Affected Public” include facilities that perform surface coating of metal furniture products. The ‘burden’ to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal). The ‘burden’ to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors; this burden is found below in Table 2: Average Annual EPA Burden and Cost – NSPS for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal). None of the 400 facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 400 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. This estimate was derived based on Agency's industry analysis during previous renewals of the ICR.

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (ICR) without any "Terms of Clearance."

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.  
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, volatile organic compound (VOC) emissions from metal furniture coating either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source

category at 40 CFR Part 60, Subpart EE.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance.

The notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and leaks are being detected and repaired and that these same standards are being met. The performance test may also be observed.

The required semiannual and quarterly reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

## **3. Non-duplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart EE.

### **3(a) Non-duplication**

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

### **3(b) Public Notice Required Prior to ICR Submission to OMB**

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (82 FR 29552) on June 29, 2017. No comments were received.

### **3(c) Consultations**

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 400 respondents will be subject to these standards over the three-year period covered by this ICR, and there will be no new respondents per year through the period.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Business and Institutional Furniture Manufacturers Association (BIFMA), at (616) 285-3963; and 2) the American Coatings Association (ACA), at (202) 462-6272.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

### **3(d) Effects of Less-Frequent Collection**

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and that emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

### **3(e) General Guidelines**

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

### **3(f) Confidentiality**

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 *FR* 36902, September 1, 1976; amended by 43 *FR* 40000, September 8, 1978; 43 *FR* 42251, September 20, 1978; 44 *FR* 17674, March 23, 1979).

### **3(g) Sensitive Questions**

The reporting or recordkeeping requirements in these standards do not include sensitive

questions.

#### 4. The Respondents and the Information Requested

##### 4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are metal furniture coating facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards, and the corresponding North American Industry Classification System (NAICS) codes, are listed below for metal furniture coating facilities:

Standard (40 CFR Part 60, Subpart EE)	SIC Codes	NAICS Codes
Metal Household Furniture Manufacturing	2514	337124
Office Furniture (except Wood) Manufacturing	2522	337214
Institutional Furniture Manufacturing	2531, 2542	337127
Showcase, Partition, Shelving, and Locker Manufacturing	2542, 2514	337215

##### 4(b) Information Requested

###### (i) Data Items

In this ICR, all the data that are recorded or reported is required by the NSPS for Metal Furniture Coating (40 CFR Part 60, Subpart EE).

A source must make the following reports:

Notifications	
Notification of construction/reconstruction	§ 60.7(a)(1)
Notification of initial performance test	§§ 60.7(a)(5), 60.8(d)
Notification of actual startup	§ 60.7(a)(3)
Notification of a physical or operational change.	§ 60.7(a)(4)
Notification of demonstration of continuous monitoring system	§ 60.7(a)(5)

Reports	
Initial performance test results	§§ 60.8(a), 60.315(a)
Semiannual report	§§ 60.315(b) - (c), 60.7(c)

<b>Reports</b>	
Excess emissions and monitoring systems performance reports	§§ 60.315(b) – (c), 60.7(c)

A source must keep the following records:

<b>Recordkeeping</b>	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative.	§ 60.7(b)
Records are required to be retained for two years at the facility.	§ 60.315(d)
Maintain a file of all measurements including the monitoring device, and performance testing measurements, and monitoring device calibrations, checks, adjustments and maintenance performed on these devices.	§ 60.7(e)
Maintain a file of all data and calculations used to determine VOC emissions.	§ 60.315(d)
Maintain daily records of incinerator combustion temperature where compliance is achieved through thermal incineration, or daily records of gas temperature upstream and downstream of the incinerator catalyst bed where compliance is achieved through catalytic incineration, or daily records of amounts of solvent recovered where compliance is achieved through solvent recovery system.	§ 60.315(d)

### Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for temperature for incinerator; for a capture system and a solvent recovery system used to comply with the standard, install the equipment necessary to determine the total volume of VOC-solvent recovered daily.

<b>Respondent Activities</b>
Perform initial performance test, Reference Method 24 test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

## **5. The Information Collected: Agency Activities, Collection Methodology, and Information Management**

### **5(a) Agency Activities**

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, semiannual reports, and quarterly excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

### **5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the

emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for two years.

### **5(c) Small Entity Flexibility**

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NSPS for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal).

## **6. Estimating the Burden and Cost of the Collection**

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping



and reporting requirements is estimated to be 56,500. These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously-approved ICR, and any comments received.

## **6(b) Estimating Respondent Costs**

### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$147.40 (\$70.19 + 110%)
Technical	\$117.92 (\$56.15 + 110%)
Clerical	\$57.02 (\$27.15 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

### **(ii) Estimating Capital/Startup and Operation and Maintenance Costs**

The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

### **(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs**

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondent s	(D) Total Capital/Startup Cost (B x C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M (E x F)
Temperature	4,400	0	\$0	\$2,100	400	\$840,000

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$840,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$840,000. These are

recordkeeping costs.

### **6(c) Estimating Agency Burden and Cost**

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes such activities as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$105,000.

This cost is based on the average hourly labor rate as follows:

Managerial	\$65.71 (GS-13, Step 5, \$41.07 + 60%)
Technical	\$48.75 (GS-12, Step 1, \$30.47 + 60%)
Clerical	\$26.38 (GS-6, Step 3, \$16.49 + 60%)

These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NSPS for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal).

### **6(d) Estimating the Respondent Universe and Total Burden and Costs**

Based on our research for this ICR, on average over the next three years, approximately 400 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 400 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	400	0	0	400
2	0	400	0	0	400
3	0	400	0	0	400
Average	0	400	0	0	400

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 400.

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	0	1	0	0
Notification of initial performance test	0	1.2	0	0
Notification of actual startup	0	1	0	0
Initial performance test report	0	1.2	0	0
Semiannual report	400	2	0	800
Quarterly excess emissions report and semiannual monitoring systems performance report	80	2	0	160
			Total	960

The number of Total Annual Responses is 960.

The total annual labor costs are \$6,440,000 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal).

### **6(e) Bottom Line Burden Hours and Cost Tables**

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown below in Tables 1 and 2, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 56,500 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 59 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$840,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

#### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 2,210 labor hours at a cost of \$105,000; see below in Table 2: Average Annual EPA Burden and Cost – NSPS for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal). We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

### **6(f) Reasons for Change in Burden**

There is no change in the burden in this ICR compared to the previous ICR. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 59 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information

either to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2012-0530. An electronic version of the public docket is available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2012-0530 and OMB Control Number 2060-0106 in any correspondence.

### **Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this information.

**Table 1: Annual Respondent Burden and Cost – NSPS for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal)**

Burden Item	Person-Hours per occurrence (A)	Number of occurrences per year (B)	Person- Hours per respondent per year (C=AxB) (C)	Respondents per Year <sup>a</sup> (D)	Technical Person Hours per Year (E=CxD) (E)	Managerial Person Hours per Year (F=Ex0.05) (F)	Clerical Person Hours per Year (G=Ex0.10) (G)	Annual Costs per Year <sup>b</sup> (H)
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarization with regulatory requirements	1	1	1	400	400	20	40	\$52,394.58
B. Required Activities								
Initial Performance Tests	60	1	60	0	0	0	0	\$0
Repeat Performance Tests <sup>c</sup>	60	0.2	12	0	0	0	0	\$0
C. Gather Existing Information	See 3b							
D. Write Report								
Notification of Construction or Reconstruction	2	1	2	0	0	0	0	\$0
Notification of Initial Performance Test	2	1	2	0	0	0	0	\$0
Notification of Actual Startup	2	1	2	0	0	0	0	\$0
Report of Performance Test	See 3b							
Semiannual Report <sup>d</sup>	8	2	16	400	6400	320	640	\$838,313.28
Quarterly Excess Emissions Report and Semiannual Monitoring Systems Performance Report <sup>e</sup>	16	2	32	80	2560	128	256	\$335,325.31

Burden Item	Person-Hours per occurrence (A)	Number of occurrences per year (B)	Person- Hours per respondent per year (C=AxB) (C)	Respondents per Year <sup>a</sup> (D)	Technical Person Hours per Year (E=CxD) (E)	Managerial Person Hours per Year (F=Ex0.05) (F)	Clerical Person Hours per Year (G=Ex0.10) (G)	Annual Costs per Year <sup>b</sup> (H)
<b>Subtotal for Reporting Requirements</b>					<b>10,764</b>			<b>\$1,226,033</b>
4. Recordkeeping requirements								
A. Familiarization with regulatory requirements	See 3b							
B. Plan activities	See 3b							
C. Implement activities								
Monthly Performance Test <sup>f</sup>	1	12	12	400	4800	240	480	\$628,734.96
D. Develop record system	N/A							
Records of Operating Parameter <sup>g</sup>	0.25	350	87.5	400	35000	1750	3500	\$4,584,525.75
<b>Subtotal for Recordkeeping Requirements</b>					<b>45,770</b>			<b>\$5,213,261</b>
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>h</sup></b>					<b>56,500</b>			<b>\$6,440,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>h</sup></b>								<b>\$840,000</b>
<b>GRAND TOTAL (rounded) <sup>h</sup></b>								<b>\$7,280,000</b>

<sup>a</sup> We have assumed that there are approximately 400 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years.

<sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from "column 1, Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed that tests will fail 20% of the time.-

<sup>d</sup> We have assumed that each respondent will take eight hours twice per year to complete the semiannual report.

Burden Item	Person-Hours per occurrence (A)	Number of occurrences per year (B)	Person- Hours per respondent per year (C=AxB)	Respondents per Year <sup>a</sup> (D)	Technical Person Hours per Year (E=CxD)	Managerial Person Hours per Year (F=Ex0.05)	Clerical Person Hours per Year (G=Ex0.10)	Annual Costs per Year <sup>b</sup> (H)
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<sup>e</sup> We have assumed that 20 percent of respondents will experience twice a year both a monitoring exceedance under 40 CFR 60.315(c) and an exceedance of the standard in 40 CFR 60.312. We assume that it will take 16 hours to complete these reports, assuming it takes 8 hours to complete each excess emissions report in 40 CFR 60.315(b) and 8 hours to complete each monitoring systems performance report in 40 CFR 60.315(c).

<sup>f</sup> We have assumed that each respondent will take one hour once per month to record monthly performance test.

<sup>g</sup> We have assumed that each respondent will take 0.25 hours per day over 350 days per year to keep record of operating parameters.

<sup>h</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



**Table 2: Average Annual EPA Burden and Cost – NSPS for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal)**

Activity	EPA Hours per Occurrence (A)	Number of occurrences per year (B)	EPA Person Hours per Year (C=AxB) (C)	Respondents per Year (D) <sup>a</sup>	Technical Person Hours per Year (E=CxD) (E)	Managerial Person Hours per Year (F=Ex0.05) (F)	Clerical Person Hours per Year (G=Ex0.10) (G)	Annual Costs (\$/year) <sup>b</sup> (H)
Required activities								
Initial performance test	24	1	24	0	0	0	0	\$0
Repeat performance test <sup>c</sup>	24	0.2	4.8	0	0	0	0	\$0
Report review								
Notification of Construction	2	1	2	0	0	0	0	\$0
Notification of Initial Startup	0.5	1	0.5	0	0	0	0	\$0
Notification of Actual Startup	0.5	1	0.5	0	0	0	0	\$0
Notification of Initial Performance Test	0.5	1.2	0.6	0	0	0	0	\$0
Performance Test Results	8	1.2	9.6	0	0	0	0	\$0
Semiannual Reports <sup>d</sup>	2	2	4	400	1600	80	160	\$87,481.60
Quarterly Excess Emissions Report and Semiannual Monitoring Systems Performance Report <sup>e</sup>	2	2	4	80	320	16	32	\$17,496.32
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>f</sup></b>						<b>2,210</b>		<b>\$105,000</b>

<sup>a</sup> We have assumed that there are approximately 400 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years.

<sup>b</sup> This cost is based on the following labor rates: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and Clerical rate of \$26.38 (GS-6, Step 3, \$16.49 + 60%). The rates have been increased by 60 percent to account for the benefit packages available to government employees. These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes locality rates of pay.

<sup>c</sup> We have assumed that tests will fail 20% of the time.-

<sup>d</sup> We have assumed that it will take two hours twice per year to review the semiannual report.

<sup>e</sup> We have assumed that EPA will take two hours to review both reports: one hour to review each excess emissions report and one hour to review each monitoring systems performance report. We also assumed that 20 percent of existing plants will submit twice per year an excess emissions report and a

Activity	EPA Hours per Occurrence (A)	Number of occurrences per year (B)	EPA Person Hours per Year (C=AxB) (C)	Respondent s per Year (D) <sup>a</sup>	Technica l Person Hours per Year (E=CxD) (E)	Manageria l Person Hours per Year (F=Ex0.05) (F)	Clerical Person Hours per Year (G=Ex0.10) (G)	Annual Costs (\$/year) <sup>b</sup> (H)
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monitoring systems performance report.

<sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.