

SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

**1 NESHAP for the Wood Building Products Surface Coating Industry
(40 CFR Part 63, Subpart QQQQ) (Proposed Amendments)
February 2018**

Part A of the Supporting Statement

1. Identification of the Information Collection

1(a) Title of the Information Collection

“NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Proposed Amendments),” EPA ICR Number 2034.07, OMB Control Number 2060-0510.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Wood Building Products Surface Coating Industry were proposed on June 21, 2002 and promulgated on May 28, 2003. Amendments to the NESHAP are being proposed as a result of the residual risk and technology review (RTR) required under the Clean Air Act (CAA) (as discussed further below). The NESHAP applies to new and existing facilities that perform surface coating of wood building products where the total Hazardous Air Pollutants (HAPs) emitted are greater than or equal to 10 tons per year of any one HAP, or where the total HAPs emitted are greater than or equal to 25 tons per year of any combination of HAPs, and that use at least 4,170 liters (1,100 gallons) of coatings annually. New facilities include those that commenced construction, modification, or reconstruction after the date of the original proposal (June 21, 2002). This information is being collected to assure compliance with 40 CFR Part 63, Subpart QQQQ.

In general, all NESHAP require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. Owners/operators are also required to maintain records of the occurrence and duration of any failures to meet applicable standards, 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 NESHAP. A semiannual compliance report is also required.

Any owner/operator subject to NESHAP shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the appropriate U. S. Environmental Protection Agency (EPA) regional office.

The proposed RTR amendments to the rule would eliminate the startup, shutdown, and malfunction (SSM) exemption; remove the SSM plan requirement; add electronic submittal of notifications, semiannual reports and performance test reports; and make technical and editorial

changes. The remaining portions of the NESHAP would remain unchanged.

The “Affected Public” are private sector businesses that perform surface coating of wood building products. The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Proposed Amendments). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors; this burden is found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Proposed Amendments).

Over the next three years, an average of 55 respondents per year will be subject to the NESHAP. These estimates are based on research conducted by the EPA during the subpart QQQQ RTR rulemaking and consultation with the industry. The EPA is also aware that this industry is undergoing some consolidation in certain product subcategories and corporate restructuring, and consequently, we are not aware of new major source facilities that are being built.

The Office of Management and Budget (OMB) approved the currently active ICR without any “Terms of Clearance.”

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

Section 112 of the CAA requires the EPA to establish NESHAP for major sources of HAP that are listed for regulation under CAA section 112(c). A major source is a stationary source that emits or has the potential to emit more than 10 tons per year (tpy) of any single HAP or more than 25 tpy of any combination of HAP. For major sources, the NESHAP includes technology-based standards that must reflect the maximum degree of emission reductions of HAP achievable (after considering cost, energy requirements, and non-air quality health and environmental impacts). The NESHAP are commonly referred to as maximum achievable control technology (MACT) standards. In the Administrator's judgment, HAP emissions, including acetaldehyde, formaldehyde, methanol, methyl isobutyl ketone, phenol, toluene, and xylenes, from surface coating operations at wood building products facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP for this source category were promulgated at 40 CFR Part 63, Subpart QQQQ in May 2003.

Section 112(d)(6) of the CAA requires the EPA to review the technology-based MACT standards and revise them “as necessary (taking into account developments in practices, processes, and control technologies)” no less frequently than every 8 years. In addition, section 112(f) of the CAA requires the EPA to determine whether the MACT emissions limitations provide an ample margin of safety to protect public health. For MACT standards for HAP “classified as a known, probable, or possible human carcinogen” that “do not reduce lifetime

excess cancer risks to the individual most exposed to emissions from a source in the category or subcategory to less than 1-in-1 million,” the EPA must promulgate residual risk standards for the source category (or subcategory) as necessary to provide an ample margin of safety to protect public health. In doing so, EPA may adopt standards equal to existing MACT standards, if the EPA determines that the existing standards are sufficiently protective. The EPA must also adopt more stringent standards, if necessary, to prevent an adverse environmental effect, but must consider cost, energy, safety, and other relevant factors in doing so.

Certain records and reports are necessary for the Administrator to confirm the compliance status of sources subject to NESHAP, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the CAA and set out in the part 63 NESHAP General Provisions (40 CFR Part 63, Subpart A). CAA Section 114(a) states that the Administrator may require any owner or 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.

2(b) Practical Utility/Users of the Data

The control of emissions of HAP from surface coating operations at wood building products facilities requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of HAP from these sources are the result of operation of the affected sources.

The standards are achieved by the reduction of pollutant emissions using compliant materials, process changes and control technology. The notifications required in the 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, leaks are being detected and repaired, compliant materials are being used, and the standards are being met.

Performance test reports are needed, as these are the Agency’s record of a source’s initial capability to comply with the emission standards and serve as a record of the operating conditions under which compliance was achieved. The semiannual reports are used for problem

identification, as a check on source operation and maintenance and for compliance determinations.

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to use compliant coatings or operate their control equipment and achieve continuous compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the CAA. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

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

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart QQQQ.

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

This section is not applicable because this is a rule-related ICR. Nevertheless, the ICR will be available for public review during the public comment period following publication of the proposed RTR amendments to Subpart QQQQ in the Federal Register.

3(c) Consultations

Stakeholder outreach occurred prior to proposal with industry groups, including the American Forest and Paper Association (AF&PA), the American Wood Council (AWC), the Composite Panel Association (CPA), the Wood Windows and Doors Association, and member companies of all four associations. Further stakeholder and public input will occur through public comment on the proposed RTR amendments and follow-up meetings with interested stakeholders.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards and the proposed RTR amendments 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 and the proposed RTR amendments do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. The EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. The EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records in the absence of the five-year maintenance requirement.

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

None of the reporting or recordkeeping requirements or the proposed RTR amendments contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements and the proposed RTR amendments are wood building products surface coating facilities. The North American Industry Classification System (NAICS) codes for respondents affected by the standards are listed in the

table below.

Standard (40 CFR Part 63, Subpart QQQQ)	NAICS Codes
Hardwood Veneer and Plywood Manufacturing	321211
Softwood Veneer and Plywood Manufacturing	321212
Engineered Wood Member (except Truss) Manufacturing	321213
Truss Manufacturing	321214
Reconstituted Wood Product Manufacturing	321219
Wood Window and Door Manufacturing	321911
Other Millwork (including Flooring)	321918
All Other Miscellaneous Wood Product Manufacturing	321999

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are or would be recorded or reported is required by the NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) or would be required under the proposed RTR amendments. Subpart QQQQ references 40 CFR Part 63, Subpart A for several general reporting and recordkeeping requirements that apply for all NESHAP.

A source must make the following notifications and reports:

Notifications	
Initial notification	63.4710(b), 63.5(d), 63.9(b)
Notification of compliance status	63.4710(c), 63.9(h)
Notification of construction or reconstruction	63.5
Notification of actual startup	63.9(b)
Notification of performance test	63.7(b), 63.8(e), 63.9(e)

Reports	
Electronic submittal of semiannual reports	63.4720(a)
Excess emissions report	63.4720(a)(4-7)
Report of performance test	63.4720(b)
Electronic submittal of performance test data (added requirement in the proposed RTR amendments)	63.4720(c)

A source must keep the following records:

Recordkeeping	
Five-year retention of records	63.4731(b), 63.10(b)
Material formulation data	63.4730(b)
Records of HAP content calculations	63.4730(c)
Copies of notifications and reports	63.4730(a)
Records of names of materials used	63.4730(d)
HAP fractions in each material used	63.4730(e)
Coating solids fraction in each material used	63.4730(f)
Density of materials used	63.4730(g)
Documentation of waste material shipped offsite	63.4730(h)
Documentation of control device performance tests	63.4730(k),63.10(b)
Values measured by continuous monitoring systems	63.4730(k)
Monitoring system calibrations, maintenance	63.4730(k)
Periods of monitoring system failure shutdown	63.4730(j),(k)

Electronic Reporting

Currently, some sources are using monitoring equipment that provides automated parameter data (e.g., control device parameter monitoring). Although personnel at the facilities still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. Modern wood building product facilities employ distributive controls on their manufacturing process and have integrated many of the compliance recordkeeping and reporting requirements into their systems. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically, which is reducing the reporting burden. As part of the proposed RTR amendments, respondents would be required to use the EPA's Electronic Reporting Tool (ERT)

to submit performance test reports for test methods supported by the ERT.¹ Respondents would also be required to submit notifications and semiannual reports through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI).

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate compliance monitoring system (CMS) for temperature, for gas flow, or for pressure drop for oxidizer, carbon adsorber, condenser, concentrator, or capture system.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, #A, 3B, 4, 24, 25, 25A, 204, 204A, 204B, 204C, 204D, 204E, 204F, 311, or ASTM Method D1475-98, D2697-86, D6093-97 test, 320, 326 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.

¹ As of February 2018, all test methods referenced in subpart QQQQ are included in the ERT, except proposed EPA Method 326.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications, including notifications of construction/reconstruction, actual startup, applicability of standard, performance test, and compliance status..
Review reports, including performance test reports, and 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 and note the operating conditions under which compliance was achieved. 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 entered into the EPA's Enforcement and Compliance History Online (ECHO), which is operated and maintained by the EPA's Office of Enforcement and Compliance Assurance. ECHO is the EPA's database to provide integrated compliance and enforcement information for about 800,000 regulated facilities nationwide. The EPA uses ECHO for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. The EPA and its delegated authorities can edit, store, retrieve and analyze the data. ECHO allows users (including the public) to search and obtain information on permits data, inspections, violations, enforcement actions, and penalties.

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

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, approximately 40% of the facilities in the category are small businesses, therefore the impact on small entities was taken into consideration during the development of the regulation and its proposed RTR amendments. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are and would remain 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. Based on a review of company sales, 21 of the parent companies affected by the proposed action were estimated to be small entities as defined by the Small Business Administration.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Proposed Amendments).

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. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or 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 and the proposed RTR amendments is estimated to be 21,451 (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP 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:

Civilian Worker Rates	Labor Rates, \$/hr ^a	110% Overhead	Total, \$/hr
Managerial	\$50.52	\$55.57	\$106.09
Technical	\$35.06	\$38.57	\$73.63
Clerical	\$21.14	\$23.25	\$44.39

^a <https://www.bls.gov/news.release/ecec.t02.htm>

These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2016, “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 that are addressed elsewhere in this ICR and the costs associated with continuous monitoring, performance testing, and other compliance activities. The capital/startup costs are one-time costs when a facility becomes subject to the regulation and include startup cost for continuous monitoring systems (CMS) and the purchase of stack testing services. Stack testing services (i.e., performance tests) are considered capital costs because it is assumed that a contractor will be hired to conduct the testing rather than the testing being conducted by facility personnel. The capital cost of \$14,000 per Method 25/25A or 326 test and \$8,000 per Method 204 test assumes the contractor will set up and tear down all the test equipment, perform the testing, and provide a written test report. . The annual operation and maintenance costs include costs such as photocopying and postage.

(iii) Capital/Startup Costs

The table below summarizes the capital/startup costs associated with performance tests. We estimate that operation and maintenance (O&M) costs to maintain monitors are already included in the costs of existing monitors.

Capital/Startup Costs			
(A) Cost Item	(B) Capital/Startup Cost for One Respondent	(C) Number of Respondents	(D) Total Capital/ Startup Cost, (B x C)
Performance tests:			
Method 25/25A for organic HAP	\$14,000	0	\$0
Method 326 for isocyanates	\$14,000	1	\$14,000
Method 204 for capture efficiency	\$8,000	1	\$8,000
Total capital/startup cost			\$22,000

The total capital/startup costs for this ICR are \$22,000. This is the total of the capital/startup costs in column D in the above table.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are costs associated with review of the semiannual compliance reports, excess emissions reports, and analysis of the reported information. Publication and distribution of the information are part of the ECHO program. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of the EPA's overall compliance and enforcement program. The average annual Agency cost during the 3 years of the ICR is estimated to be \$74,000.

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

Agency Worker Rates	Labor Rates, \$/hr^a	60% Overhead	Total, \$/hr
Managerial (GS-13, step 5)	\$40.50	\$24.30	\$64.80
Technical (GS-12, step 1)	\$30.05	\$18.03	\$48.08
Clerical (GS-6, step 3)	\$16.26	\$9.76	\$26.02

^a https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/GS_h.pdf

These rates are from the Office of Personnel Management (OPM), 2017 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP

for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Proposed Amendments).

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 55 existing respondents will be subject to the standard. It is estimated that no additional respondents will become subject. The overall average number of respondents, as shown in the table below is 55 per year.

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

Number of Respondents					
Year	(A) Number of New Respondents ¹	(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	1	55	0	1	55
2	0	55	0	0	55
3	0	55	0	0	55
Average	0.3	55	0	0.3	55

¹ New respondent 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 3-year period of this ICR is 55.

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

Total Annual Responses				
(A) Information Collection Activity ^a	(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
Initial notification ^b	0	1	0	0
Notification of compliance status ^b	1	1	0	1
Notification of construction/reconstruction	1	1	0	1
Notification of actual startup	1	1	0	1
Notification of performance test 1	1	1	0	1
Report of performance test	1	1	0	1
Semiannual report	55	2	0	110
			Total	115

^a Notifications and semiannual reports submitted through CEDRI. Report of performance test submitted through ERT.

^b The number of respondents for one-time initial notifications is zero over the next 3 years to this ICR.

The number of Total Annual Responses is 115, most of which will be submitted electronically.

The total annual labor costs are \$1,418,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Proposed Amendments).

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 in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 19,562 hours at a cost of \$1,418,217. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Proposed Amendments).

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 170 hours per response.

The total annual capital/startup costs to the regulated entities are \$22,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over the next three years is estimated to be 1,582 labor hours at a cost of \$74,197. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Proposed Amendments).

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

This ICR is prepared for proposed RTR amendments to the NESHAP for Surface Coating of Wood Building Products (40 CFR, Part 63, Subpart QQQQ). These proposed RTR amendments would: (1) adjust references to the Part 63 General Provisions (40 CFR, Part 63, Subpart A) and revise provisions in the NESHAP (40 CFR Part 63, Subpart QQQQ) to remove the SSM exemption and SSM plan requirement; (2) add electronic submittal of semiannual reports and performance test reports; and (3) make technical and editorial changes. Where applicable, adjustments for these proposed RTR amendments are reflected in Tables 1 and 2 of this ICR.

The number of affected facilities changed from the estimate conducted for the 2003 NESHAP because of: (1) continued consolidation and closures within the wood building products industry; and (2) updates to the number of affected facilities based on EPA's recent RTR efforts and subsequent updates from other information sources.

Costs per labor hour increased due to increases in labor rates. In addition, the burden estimate for reading and understanding the rule requirements was increased to reflect the actual time it would take industry to review the proposed rule amendments. Burden estimates were added for the industry to prepare for performance tests, report the results of the performance tests through the ERT, and transition to submitting notifications and semiannual reports through CEDRI. Burden estimates were removed for developing SSM plans and submitting periodic SSM reports.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 186 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information 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 not conduct or 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-OAR-2016-0678. 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 EPA Docket Center, EPA WJC West Building, Room Number 3334, 1301 Constitution Ave., NW, Washington, DC. The Public Reading Room hours of operation are 8:30 a.m. to 4:30 p.m. Eastern Standard Time (EST), Monday through Friday, excluding legal holidays. The telephone number for the Public Reading Room is (202) 566-1744, and the telephone number for the Docket Center is (202) 566-1742. Send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, NW, Washington, DC 20503, Please include the EPA Docket ID Number EPA-HQ-OAR-2016-0678 and OMB Control Number 2060-0510 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in data collection associated with the rule.

Table 1: Annual Respondent Burden and Cost – NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Proposed Amendments)

Burden Item	(A) Person-hours per occurrence	(B) Number of occurrences per year	(C) Person-hrs. per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person-hrs. per year (E=CxD)	(F) Management person-hrs. per year (F=Ex0.05)	(G) Clerical person-hrs. per year (G=Ex0.1)	(H) Annual costs (\$) ^b
1. Reporting requirements								
a. Familiarize with rule requirements ^a	8	1	8	18.3	146.4	7.3	14.6	\$12,202
b. Process/review information ^a	4	4	16	18.3	292.8	14.6	29.3	\$24,408
c. Prepare for initial performance test ^{a,g}	24	1	24	1	24	1.2	2.4	\$2,001
c. Write reports								
Notifications ^d								
i. Initial notification ^a	2	1	2	0	0	0	0	\$0
ii. Notification of compliance status ^{a,d}	10	1	10	1	10	0.5	1	\$834
iii. Notification of construction/reconstruction	2	1	2	1	2	0.1	0.2	\$167
iv. Notification of actual startup	2	1	2	1	2	0.1	0.2	\$167
v. Notification of performance test	2	1	2	1	2	0.1	0.2	\$167
vi. Report of performance test (through ERT) ^e	10	1	10	1	10	0.5	1	\$834
viii. Semiannual report	8	2	16	55	880	44	88	\$73,369
Subtotal for Reporting Requirements					1,575			\$114,148
2. Recordkeeping requirements								
a. Familiarize with rule requirements	See 1A							
b. Plan activities	12	1	12	18.3	219.6	11	22	\$18,313
c. Implement activities	12	1	12	18.3	219.6	11	22	\$18,313
d. Maintain record system for	20	1	20	55	1,100	55	110	\$91,711

material used								
e. Time to enter information								
i. Material purchase records ^c	4	1	4	22	88	4.4	8.8	\$7,337
ii. Material usage records ^c	16	12	192	33	6,336	316.8	633.6	\$528,254
iii. Compliance calculations ^c	8	12	96	33	3,168	158.4	316.8	\$264,127
f. Time to train personnel ^f	10	1	10	55	550	27.5	55	\$45,855
g. Store, file, and maintain records	4	12	48	55	2,640	132	264	\$220,106
h. Retrieve records/reports	2	12	24	55	1,320	66	132	\$110,053
Subtotal for Recordkeeping Requirements						17,988		\$1,304,069
TOTAL LABOR BURDEN AND COST (rounded)						19,562		\$1,418,217
Total Capital/Startup Costs								\$22,000
Method 326 (isocyanates)								\$14,000
Method 204 (capture efficiency)								\$8,000

Assumptions:

^a There is an average of 55 respondents per year over the next three years to this ICR (55 respondents/3 years = 18.3 facilities); 4 existing facilities have add-on controls, which required initial performance tests and associated reporting, but not periodic performance tests and associated reporting; and one facility will have an initial performance test on a new coating process.

^b This ICR uses the following labor rates: \$106.09 per hour for Executive, Administrative, and Managerial labor; \$73.63 per hour for Technical labor, and \$44.39 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2016, "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.

^c We estimate that 40% of facilities are using the compliant material option to comply with the rule; therefore 40% of the 55 facilities (22 respondents) have to provide material purchase records and 60% of the 55 facilities (33 respondents) are tracking material usage and doing monthly compliance calculations.

^d We estimate that it will take the respondent 10 hours to prepare the notification of compliance status.

^e Hard copy report of performance test/retest is included in capital/startup costs. Submittal of performance test/retest data through the EPA's ERT is estimated to require 10 hours for those facilities using performance testing on their add-on controls to demonstrate compliance.

^f We estimate that it will take the respondent 10 hours once per year for initial training of personnel.

^g We estimate 16 coating operations with add-on controls at 4 existing facilities.

Table 2: Average Annual EPA Burden and Cost – NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Proposed Amendments)

Burden Item	(A) EPA Person- hours per activity	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (F=Ex0.05)	(G) Clerical person- hours per year (G=Ex0.1)	(H) Annual costs (\$) ^b
1. Initial performance test	16	1	16	1	16	0.8	1.6	\$863
2. Repeat performance test	16	0	0	0	0	0	0	\$0
3. Report review								
a) Initial notification	8	1	8	0	0	0	0	\$0
b) Notification of compliance status	8	1	8	1	8	0.4	0.8	\$431
c) Notification of construction/reconstruction	8	1	8	1	8	0.4	0.8	\$431
d) Notification of actual startup	8	1	8	1	8	0.4	0.8	\$431
e) Notification of performance test	8	1	8	1	8	0.4	0.8	\$431
f) Report of performance test	8	1	8	1	8	0.4	0.8	\$431
g) Semiannual report	12	2	24	55	1,320	66	132	\$71,177
Total Burden Hours and Costs ^c						1,582		\$74,197

Assumptions:

^a There is an average of 55 respondents per year over the next three years to this ICR;

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$64.80(GS-13, Step 5, \$40.50 x 1.6), Technical rate of \$48.08 (GS-12, Step 1, \$30.05 x 1.6), and Clerical rate of \$26.02 (GS-6, Step 3, \$16.26 x 1.6). These rates are from the Office of Personnel Management (OPM) 2014 General Schedule which excludes locality rates of pay.

^c Figures may not add exactly due to rounding.