

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Surface Coating of Metal Furniture (40 CFR Part 63, Subpart RRRR) (Final Rule)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for the Surface Coating of Metal Furniture (40 CFR Part 63, Subpart RRRR) (Final Rule), EPA ICR Number 1952.09 OMB Control Number 2060-0457.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Surface Coating of Metal Furniture (40 CFR 63, Subpart RRRR) were proposed on April 24, 2002 and promulgated on May 23, 2003. The NESHAP is codified at 40 CFR part 63, Subpart RRRR. This supporting statement addresses new information collection activities that would be imposed by amendments as part of the EPA's residual risk and technology review (RTR), conducted in accordance with section 112 of the Clean Air Act (CAA).

The Surface Coating of Metal Furniture NESHAP (40 CFR 63.4881) defines a "metal furniture" as "furniture or components of furniture constructed either entirely or partially from metal. Metal furniture includes, but is not limited to, components of the following types of products as well as the products themselves: household, office, institutional, laboratory, hospital, public building, restaurant, barber and beauty shop, and dental furniture; office and store fixtures; partitions; shelving; lockers; lamps and lighting fixtures; and wastebaskets." New facilities include those that commenced construction or reconstruction after April 24, 2002.

As part of the RTR for the Surface Coating of Metal Furniture NESHAP, the EPA is revising the startup, shutdown, and malfunction (SSM) provisions of the Maximum Achievable Control Technology (MACT) rule and the use of electronic data reporting for future performance test data submittals, notifications, and reports. This information is being collected to assure compliance with 40 CFR Part 63, Subpart RRRR.

In general, all NESHAP standards require initial notifications, performance tests (if sources are using add-on controls to demonstrate compliance), 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 deviation from an emission limitation (either a numerical emission limit, an operating limit, or an equipment or work practice standard), 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 the NESHAP.

This Information Collection Request (ICR) presents the burden to respondents and the Designated Administrator (i.e., U.S. EPA or a delegated authority) by the plans developed to

implement the Metal Furniture NESHAP amendments. Respondents are owners or operators of existing major source metal furniture manufacturing facilities. The requirements described below are the minimum requirements established by the amended Metal Furniture NESHAP. Although the Designated Administrator may choose to impose more stringent requirements, it is assumed for this burden estimate that the implemented plans mirror the Metal Furniture NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain the file for at least five years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. In the event there is no such delegated authority, the reports are sent directly to the EPA regional office.

Based on our search of the National Emission Inventory (NEI) and EPA's Enforcement and Compliance History Online (ECHO) database (www.echo.epa.gov), a review of active air emissions permits, we estimate that 16 facilities are subject to the Metal Furniture NESHAP. A complete list of facilities subject to the Metal Furniture NESHAP is available in the modeling data file, which is available for review in the Docket ID No. EPA-HQ-OAR-2017-0669 for this final rulemaking.

All of the affected metal furniture surface coating facilities in the United States are owned and operated by the private industry (the "Affected Public"). None of the affected facilities in the United States are owned by state, local, tribal or the Federal government. They are all privately owned, for-profit businesses. We assume that they will all respond.

Over the next 3 years, approximately 16 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard in the next 3 years of the information collection. The industry growth rate is low. The American Coatings Association's Industry Market Analysis (9th edition, 2014 – 2019) characterized the adoption of powder coating (and high-solids coatings) and the use of pre-coated metal coil as diminishing growth.

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

The "burden" to the Affected Public may be found below in Tables 1 through 4 of Attachment 1. The cost of this ICR to the metal furniture facilities is \$31,900 in labor or \$11,000 if averaged over the first three years after the amendments are final.

The total Agency cost during the ICR is estimated to be \$3,500 or \$1,200 per year. The "burden" to the Agency may be found below in Tables 5 through 8 of Attachment 2. The burden includes the cost to Federal EPA and state agencies to implement the amendments.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is requiring this information collection under its existing CAA authority provided in CAA sections 112 and 114. 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 of any single HAP or more than 25 tons per year 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). In the Administrator's judgment, HAP emissions, including xylene, glycol ethers, ethylbenzene, toluene, and cumene from metal furniture coating operations cause or contribute to air pollution that may be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart RRRR in 2003.

Section 112(d)(6) of the CAA requires the EPA to review the technology-based 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 emissions limitations provide an ample margin of safety to protect public health. For 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 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. These amendments to 40 CFR 63, Subpart RRRR will address the results of the residual risk and technology review.

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 (42 U.S.C. 7414) 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/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 recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the CAA. The collected information is also used for targeting inspections and as evidence in legal proceedings.

For facilities using the emission rate with add-on control compliance option, performance tests are required 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. Continuous parametric monitoring system are used to ensure compliance with the standard at all times.

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

Owners and operators of affected sources must submit electronic copies of initial notifications required in 40 CFR 63.9(b), notifications of compliance status required in 40 CFR 63.9(h), performance test reports, and semiannual reports through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For semiannual reports, EPA would develop a template for the reporting form in CEDRI specifically for 40 CFR part 63, subpart RRRR.

CEDRI includes software called the Electronic Reporting Tool (ERT), which is used by facilities to generate electronic reports of performance tests. EPA is also requiring that 40 CFR part 63, subpart RRRR performance test reports be submitted through the EPA's ERT.

These standards also amend subpart RRRR to remove an exemption from the emission limitations during periods of SSM and revise the monitoring, recordkeeping, and reporting requirements that are affected by the amendments to the SSM provisions.

3. Nonduplication, Consultations, and Other Collection Criteria

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

3(a) Nonduplication

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, no duplication exists.

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

A public notice of this collection is provided in the Federal Register notice of proposed rulemaking entitled, “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances; Printing, Coating, and Dyeing of Fabrics and Other Textiles; and Surface Coating of Metal Furniture Residual Risk and Technology Review” 83FR46262 on September 12, 2018

3(c) Consultations

The Agency has consulted industry experts (i.e., ACA Industry Market Analysis) and internal data sources to project the number of affected facilities and industry growth over the next 3 years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, 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. Zero respondents will be subject to the standard over the three-year period covered by this ICR.

Industry trade associations and other interested parties were contacted and provided an opportunity to comment on the burden associated with the standard as it was being developed, and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

In developing this ICR, we are providing all interested parties the opportunity to review and comment on the revised burden estimated in this ICR as a result of the proposed amendments.

3(d) Effects of Less Frequent Collection

The frequency of the information collections remains the same in these proposed revisions. 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 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.

These proposed standards require the respondents to maintain all records, including reports and notifications, for at least 5 years. This is consistent with the General Provisions as applied to the standards. EPA believes that the 5-year records retention requirement is consistent with the Part 70 permit program and the 5-year statute of limitations on which the permit program is based. The retention of records for 5 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. EPA has found that the most flagrant violators have violations extending beyond 5 years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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 (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 the standard 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 facilities that perform surface coating of metal furniture. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed below for this source category.

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Standard (40 CFR Part 63, Subpart RRRR)	SIC Codes	NAICS Codes
Metal household furniture manufacturing	2514	337124
Office furniture (except wood) manufacturing	2522	337214
Institutional furniture manufacturing	2531, 2599, 3999	337127
Showcase, partition, shelving, and locker manufacturing	2542, 3499, 3429	337215
Hardware Manufacturing	-	332951
Metal stamping	3469	332116
Spring (light gauge) manufacturing	3495	332612
Residential electric lighting fixture manufacturing	3645	335121
Commercial, industrial, and institutional electric lighting fixture manufacturing	3646	335122
Laboratory apparatus and furniture manufacturing	3821, 3841	339111
Dental Equipment Manufacturing	-	339114
Reupholstery and furniture repair	7641	81142

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported are required by the NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR).

A source must make the following reports:

Notifications	
Notification of intent to construct or reconstruct	§ 63.9(b)
Initial notification	§ 63.9(b), § 63.4910
Notification of anticipated startup	§ 63.9(b), § 63.4910
Notification of actual startup	§ 63.9(b), § 63.4910
Request for extension of compliance date	§ 63.9(c)
Notification of performance test	§ 63.9(e), § 63.4910
Notification of compliance status	§ 63.9(h), § 63.4910

Reports	
Semiannual report	§ 63.4920
Excess emissions or no excess emissions report, including reporting of deviations	§ 63.4920(c), (d), (e), (f), (g)
Report of performance test	§ 63.10(d)(2), § 63.4920(b)

A source must keep the following records:

Recordkeeping	
Copies of notifications and reports	§ 63.4930(a)
Material formulation data	§ 63.4930(b)
Records of compliance option used and compliance calculations	§ 63.4930(c)
Names and volumes of each material used	§ 63.4930(d)
Mass fraction of organic HAP in each material used	§ 63.4930(e)
Coating solids fraction in each material used	§ 63.4930(f)
Density of each material used	§ 63.4930(g)
Documentation of waste material shipped offsite	§ 63.4930(h)
Deviation records	§ 63.4930(j)
Documentation of emission capture system and add-on control device performance tests, and records to show continuous compliance with operating limits	§ 63.4930(k)
Records submitted electronically via CEDRI may be kept electronically	§ 63.4930(l)
Five year retention of records	§ 63.4931(b)

Electronic Reporting

Currently, respondents using an emission capture system and add-on control device to demonstrate compliance would use 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.

The proposed RTR amendments include a requirement that facilities electing to use a control device to comply with the NESHAP would be required to submit performance test results

to the EPA through the EPA's CEDRI for data collected using test methods supported by the EPA's ERT. The performance test data would be required to be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT Web site. EPA anticipates that no new metal furniture operations will become subject to the NESHAP in the next 3 years of the information collection. Therefore, no operations will be required to electronically submit initial performance test data via CEDRI in the next 3 years of the information collection. Sources for which construction or reconstruction commenced on or before the date that these proposed amendments were published in the Federal Register, will be required to electronically submit semiannual reports starting 2 years after the effective date of the final rule or once the reporting form for the report has been available in CEDRI for at least 1-year, whichever date is later.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Review current recordkeeping systems and adjust them as needed for the amendments to the SSM provisions.
Install, calibrate, maintain, and operate CPMS for gas volumetric flow rate, duct static pressure for oxidizer, carbon adsorber, condenser, concentrator, or capture system.
Perform initial performance test, using applicable methods: Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 18, 24, 25, 25A, 204, 204A, 204B, 204C, 204D, 204E, 204F, 311, or ASTM Method D1475-13, D2111-10 (2015), D2369-10 (2015), D2697-86, D6093-97 tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Electronically submit the required reports via CEDRI, 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.

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.

Agency Activities
Observe initial performance tests, and repeated performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in ECHO and ICIS.

5(b) Collection Methodology and Management

Following notification, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. If a facility is using add-on controls to comply, performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Other facilities are expected to use purchase records and manufacturer's documentation of HAP content, based on coating formulation, to establish compliance with the final HAP content limit standards. Facilities are not expected to measure the HAP content of the coatings. 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 the proposed regulation must be retained by the owner/operator for 5 years.

5(c) Small Entity Flexibility

The impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. As no incremental costs are expected from this rule, there are no significant economic impacts on a substantial number of small entities from these proposed amendments.

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 Tables 1 through 4 of Attachment 1.

6. Estimating the Burden and Cost of the Collection

Tables 1 through 4 of Attachment 1 present an itemization of the burden on the respondents subject to the Surface Coating of Metal Furniture NESHAP for the recordkeeping and reporting requirements in the first 3 years following promulgation of the proposed amendments to the NESHAP. Tables 5 through 8 of Attachment 2 present an itemization of the Agency burden in the first 3 years following promulgation of the proposed amendments to the Surface Coating of Metal Furniture NESHAP. The individual burdens in Tables 1 through 8 of Attachments 1 and 2 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.

We are proposing the elimination of the SSM exemption in this rule. Costs associated with elimination of the SSM exemption were estimated as part of the reporting and recordkeeping costs and include time for re-evaluating previously developed SSM record systems.

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 3 years is estimated to be 123 labor hours, as shown in Tables 1 through 4 of Attachment 1. 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

The information collection activities for sources subject to these requirements are presented in Tables 1 through 4 of Attachment 1. The total cost for each respondent activity include labor costs, capital/startup costs, and operating and maintenance (O&M) costs.

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$111.03 (\$52.87 + 110%)
Technical	\$90.34 (\$43.02 + 110%)
Clerical	\$37.72 (\$17.96 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and Wage Estimates NAICS 337000 - Furniture and Related Product Manufacturing."¹ The selected labor rates are the mean hourly wage for labor categories 11-1021, 11-3051, and 43-6010 for Managerial, Technical, and Clerical, respectively. 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 activity in the regulations are labor costs.

The EPA is proposing to require that, for each coating operation for which coatings are spray applied, high efficiency spray equipment must be used if the source is not using the emission rate with add-on control compliance option. Because of the economic incentives to use high efficiency application methods for spray applied coatings, we expect that all facilities are already using high efficiency spray equipment and none will have to switch to high efficiency application methods. However, if a large appliance surface coating facility not using the emission rate with add-on control compliance option replaced their existing coating spray guns with high-efficiency spray guns required by this proposed rule, such as air-assisted airless spray guns, an estimated cost to do so would be approximately \$700 per device, based on vendor information.

If a source owner or operator chooses to comply with the standards using add-on controls, the results of an initial performance test are used to determine compliance; however, the

¹ Available at https://www.bls.gov/oes/current/naics3_337000.htm.

rule does not require on-going periodic performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting comment on whether performance testing should be required anytime a source plans to undertake an operational change that may adversely affect compliance with an applicable standard, operating limit, or parametric monitoring value.

The one-time estimated costs per add-on control device are about \$19,000 for measuring destruction or removal efficiency using EPA Method 25 or 25A. The costs assume that emissions are measured simultaneously at the inlet and outlet of the device to measure destruction or removal efficiency. These costs also assume that emission capture systems meet the design criteria for a permanent total enclosure in EPA Method 204, so that capture efficiency does not need to be measured.

No major source metal furniture surface coating facilities (40 CFR 63, subpart RRRR) are known to have add-on controls for volatile organic HAP on their surface coating operations. Therefore, all facilities are using the compliant materials option or the emission rate without add-on controls option to demonstrate compliance. This cost is not included in the attached tables because the EPA is not proposing this requirement and is only requesting comment.

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

The total capital/startup and O&M costs for this ICR are zero.

The type of industry costs associated with the information collection activity in the regulations are only labor costs.

As discussed above in section 6(b)(ii), the EPA is requesting comment on consideration of a periodic testing requirement. Emissions compliance testing costs would be treated as capital costs because facilities routinely contract with a testing company to perform the testing. No O&M costs would be assumed to be associated with the periodic testing requirement.

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 activities such 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 3 years of the ICR is estimated to be \$1,200.

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

Managerial	\$64.80 (GS-13, Step 5, \$40.50 + 60%)
Technical	\$48.08 (GS-12, Step 1, \$30.05 + 60%)
Clerical	\$26.02 (GS-6, Step 3, \$16.26 + 60%)

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 in Tables 5 through 8 of Attachment 2.

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

Based on our research for this ICR, on average over the next 3 years, approximately 16 existing respondents will be subject to the standard. It is estimated that no additional respondents will become subject to the standard in the next 3 years of the information collection. The overall average number of respondents, as shown in the table below, is 16 per year. The growth rate for the industry is based on our consultations with the Agency’s internal industry experts.

The number of respondents is calculated using the following table that addresses the 3 years covered by this ICR.

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
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	0	16	0	0	16
2	0	16	0	0	16
3	0	16	0	0	16
Average	0	16	0	0	16

¹ No new respondents include sources with constructed, reconstructed and modified affected facilities.

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

Total Annual Responses, In Year One				
(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
Familiarization with rule requirement ^a	16	1	0	16
Performance test ^b	0	0	0	0
Re-evaluate Startup, shutdown, malfunction plan (due to revision) ^c	16	1	0	16
Become familiar with CEDRI for electronic filing of notifications and reports ^d	16	1	0	16
			Total	48
Total Annual Responses, In Years Two and Three				
Familiarization with rule requirement ^a	16	0	0	0
Performance test ^b	0	0	0	0
Re-evaluate Startup, shutdown, malfunction plan (due to revision) ^c	16	0	0	0
Become familiar with CEDRI for electronic filing of notifications and reports ^d	16	0	0	0
Total				48

^a Familiarization with the amended rule requirements will occur only in year one.

^b The EPA is requesting comment on consideration of a periodic performance testing requirement. The testing requirement would require facilities that comply using emission capture systems and add-on controls to conduct air emissions performance testing, with the first test completed no later than 3 years after the effective date of the revised standards. There are no surface coating of metal furniture facilities, subpart RRRR, with add-on controls. No facilities in this industry are anticipated to have performance testing costs.

^c Due to the proposed revisions, the previously developed startup, shutdown, and malfunction record systems will need to be re-evaluated. Responses in year one associated with elimination of the SSM exemption include re-evaluating previously developed SSM record systems in year one.

^d Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the semi-annual reporting form.

The number of total annual responses in year one is 48. Years two and three have no responses.

The average annual labor costs are \$11,000. Details regarding this estimate may be found in Tables 1 through 4 of Attachment 1.

6(e) Bottom Line Burden Hours and Cost Tables

(i) Respondent Tally

The total annual labor hours for all respondents are 123 and an average annual cost of \$11,000. Details regarding these estimates may be found in 1 through 4 of Attachment 1.

No annual capital/startup and O&M costs to the regulated entity are expected for this source category.

(ii) The Agency Tally

The average annual proposed Agency labor burden, over the next 3 years is estimated to be 25 labor hours at a cost of \$1,200. Details regarding these estimates may be found in Tables 5 through 8 of Attachment 2.

6(f) Reasons for Change in Burden

There is only a small increase in the labor hours per respondent in this ICR as compared to the previous ICR. This situation is due to three considerations: 1) time in year one to get familiar with the rule amendment, 2) increased time in year one to re-evaluating previously developed SSM record systems, and 3) time in year one to become familiar with CEDRI and the electronic reporting form for the semiannual report.

Based on our search of the NEI and EPA's ECHO database (www.echo.epa.gov) and a review of active air emission permits, we estimate that 16 facilities are subject to the Surface Coating of Metal Furniture NESHAP. A complete list of facilities is available in the modeling data file, which is available for review in the docket for this proposed rulemaking.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 7.7 hours per respondent. 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-2017-0669. 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), EPA 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) 566-1927. 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-OAR-2017-0669 and OMB Control Number 2060-0518 in any correspondence.

Part B of the Supporting Statement

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

ATTACHMENT 1

TABLES 1, 2, 3, and 4

Tables 1 - 3: Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Surface Coating of Metal Furniture NESHAP – Years 1-3 (Amendments)

Table 4: Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Surface Coating of Metal Furniture NESHAP (Amendments)

ATTACHMENT 2

TABLES 5, 6, 7, and 8

Tables 5 - 7: Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Surface Coating of Metal Furniture NESHAP - Year 1-3 (Amendments)

Table 8: Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Surface Coating of Metal Furniture NESHAP (Amendments)