

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Paints and Allied Products Manufacturing Area Source Category
(40 CFR Part 63, Subpart CCCCCC) (Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal), EPA ICR Number 2348.05, OMB Control Number 2060-0633.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63) were proposed on June 1, 2009, and promulgated on December 3, 2009. These regulations apply to existing facilities and new facilities that are an area source of hazardous air pollutants (HAP) emissions and that either use or have the potential to emit urban air toxics (i.e., benzene; methylene chloride; cadmium, chromium, lead, and nickel compounds). New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart CCCCCC.

In general, all NESHAP 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 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. If the event that there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

The “Affected Public” includes paint and allied products manufacturing facilities. The ‘burden’ to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal). The ‘burden’ to the “Federal Government” is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal). There are approximately 219 paint and allied products manufacturing facilities, which are owned and operated by the paint and allied products manufacturing industry. None of the 219 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 to EPA inquiries.

Based on our consultations with industry representatives, there are an average of 219 affected facilities at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 219 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. This estimate reflects a decrease in the number of facilities that use the HAPs of concern (benzene, methylene chloride, or compounds of cadmium, chromium, lead, and/or nickel, in amounts greater than or equal to 0.1 percent by weight) and is based on information from the American Coatings Association (ACA).

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

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. 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, urban air toxics emissions from paints and allied products manufacturing facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart CCCCCC.

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 standards. Continuous emission monitors are used to ensure compliance with these standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of these 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, and that these standards are being met. The performance test may also be observed.

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.

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

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

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* (83 FR 24785) on May 31, 2018. No comments were received on the burden published in the *Federal Register* for this renewal.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. 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 the EPA database for the collection, maintenance, and retrieval of all 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 219 respondents will be subject to these same standards over the three-year period covered by this ICR. This estimate is based on information from the American Coatings Association (ACA) and reflects the number of small facilities that use the HAPs of concern (benzene, methylene chloride, or compounds of cadmium, chromium, lead, and/or nickel, in amounts greater than or equal to 0.1 percent by weight).

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 both the American Coatings Association, at (202) 462-6272, and the Adhesive and Sealant Council, at (301) 986-9700.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those comments 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 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 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 these standards. 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. 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.

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 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 paints and allied products manufacturing facilities. 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 in the table below:

Standard (40 CFR Part 63, Subpart CCCCCC)	SIC Codes	NAICS Codes
Paint and Coating Manufacturing	2851, 2899	325510
Adhesive Manufacturing	2891	325520
Printing Ink Manufacturing	2893	325910
Miscellaneous Chemical Product and Preparation Manufacturing – Writing and Stamp Inks	2819, 2899, 3952, 3999	325998

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC).

A source must make the following reports:

Notifications	
Notification of applicability	§63.11603(a)(1), §63.9(a)(2)
Notification of construction/reconstruction	§63.9(b)(5)
Notification of special compliance requirements	§63.9(d)
Notification of performance test	§63.9(e)
Notification of opacity/VE observations	§63.9(f)
Additional CMS notifications	§63.9(g)
Notification of compliance status	§63.11603(a)(2), §63.9(h)
Notification of changes in information	§63.9(j)

Reports	
Reports of exceedances	§63.11603(b)(3)
Initial/repeat performance tests	§63.7(e)(1), §63.6(h)(7)
Quality assurance test plan	§63.7(c)
CMS performance evaluation/report	§63.8(e)(5)
SSM reports	§63.6(e)(3)
Excess emissions reports	§63.10(e)(3)
Annual compliance certifications	§63.11603(b)
Performance test plan	§63.7(c)(2)
CMS quality control plan	§63.8(d)
CMS performance evaluation test plan	§63.8(e)(3)

A source must keep the following records:

Recordkeeping	
Records of notifications	§63.11603(c)(1), §63.10
Records that demonstrate continuous compliance	§63.11603(c)(2), §63.10
Monitoring/inspection information	§63.11603(c)(3), §63.10

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

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate particulate matter control device.
Perform initial performance test, Reference Method 22 or 203C 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 collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for 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:

Agency Activities
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 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 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 five years.

5(c) Small Entity Flexibility

All existing respondents subject to these standards are small entities (i.e., small 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 record-keeping 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 at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (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 500 hours (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:

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 only costs to the regulated industry resulting from information collection activities required by the subject standard(s) are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup and/or operation and maintenance 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 \$4,810.

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 at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (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 219 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards over the next three years. The overall, average number of respondents, as shown in the table below, is 219 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New	(B) Number of	(C) Number of Existing	(D) Number of	(E) Number of

Number of Respondents					
	Respondents ¹	Existing Respondents ²	Respondents that keep records but do not submit reports	Existing Respondents That Are Also New Respondents	Respondents (E=A+B+C-D)
1	0	22	197	0	219
2	0	22	197	0	219
3	0	22	197	0	219
Average	0	22	197	0	219

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

² Existing respondents include sources required to submit a report of deviation; this applies to only 10% of sources.

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 219.

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

Total Annual Responses				
(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
Annual Compliance Certification Report	22	1	197	219
Report of Exceedances	22	1	197	219
			Total	438

The number of Total Annual Responses is 438.

The total annual labor costs are \$131,000. Details regarding these estimates may be found below at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (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 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 500 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (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 1 hour per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. 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 100 labor hours at a cost of \$4,810; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (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 an adjustment decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens; this decrease is not due to any program changes. The decrease in burden is due to more accurate estimates of existing sources based on information gathered by industry. Specifically, the American Coatings Association (ACA) provided that the previous estimate of 2,190 sources is based on the 2009 proposed rule, which relied on 2002 U.S. Census data to identify 2,510 paints and allied products manufacturing facilities, of which 2,190 were further estimated to be small business and assumed to be area sources of HAP. However, the final rule made clarifications on the applicability of the NESHAP, including that final rule did not include retail and commercial paints and allied products operations which add and mix pigments to pre-manufactured products per customer specifications; that the rule does not apply to activities conducted by end users of coating products in preparation for application; and that the GACT requirements only apply when the target HAP are being processed, used, or generated (rather than at

all times regardless of whether any of the target HAP was or was not being used). The ACA indicated that because the final rule only applies to those facilities that use the HAPs of concern (benzene, methylene chloride, or compounds of cadmium, chromium, lead, and/or nickel, in amounts greater than or equal to 0.1 percent by weight), the number of affected facilities is much smaller than what was initially proposed. The ACA stated that only 10% of paint and allied products facilities (or 219 of the 2,190 small sources identified in the 2009 final rule and prior ICR) would use the HAPs of concern (benzene, methylene chloride, or compounds of cadmium, chromium, lead, and/or nickel, in amounts greater than or equal to 0.1 percent by weight). Therefore, this ICR adjusts the total number of respondents to 219. The decrease in the number of respondents also results in a decrease in responses.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 1 hour 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 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-2012-0527. 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) 566-1752. 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-2012-0527 and OMB Control Number 2060-0633 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 – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal)

Burden Item	(A) Hours per occurrence	(B) No. of occurrences per respondent per year	(C) Hours per respondent per year (A x B)	(D) Respondents per year ^a	(E) Technical hours per year (C x D)	(F) Management hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total costs per year (\$) ^b
1. Applications	N/A							
2. Survey and studies	N/A							
3. Acquisition, installation, and utilization of technical systems	N/A							
4. Reporting requirements								
A. Familiarization with the regulatory requirement	2	1	2	22	44	2.2	4.4	\$5,763.65
B. Required activities								
Initial notification ^c	1	1	1	0	0	0	0	\$0
Notification of compliance status ^c	1	1	1	0	0	0	0	\$0
Annual compliance certification ^d	1	1	1	22	22	1.10	2.2	\$2,881.82
Report of exceedences ^d	2	1	2	22	44	2.2	4.4	\$5,763.65
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Reporting subtotal					127			\$14,409.12
5. Recordkeeping requirements								
A. Familiarization with the regulatory requirement	See 4A							
B. Plan activities	See 5E							
C. Implement activities	See 5E							
D. Develop record system	See 5E							
E. Time to enter information								
Records of all information required by standards	0.25	1	0.25	219	54.8	2.74	5.48	\$7,171.81

F. Time and cost to perform VE observation ^e	1	1	1	219	219	11.0	22	\$102,052.25
G. Time to adjust existing ways to comply with previous applicable regulations	N/A							
H. Time to transmit or disclose information	0.25	1	0.25	219	54.8	2.74	5.48	\$7,171.81
I. Time for audits	N/A							
Recordkeeping subtotal						378		\$116,395.87
TOTAL ANNUAL BURDEN AND COSTS (rounded):^f						500		\$131,000
Capital and O&M Cost (see Section 6(b)(iii)):								\$0
TOTAL COST:^f								\$131,000

Assumptions:

^a We have assumed that there are 219 existing facilities that are subject to the rule, and that no new major sources per year will become subject over the 3 year-period of this ICR. We assume that 10 percent of foundries will be required to respond and will refamiliarize with the rule requirements each year.

^b This ICR uses the following labor rates: Technical \$117.92 (\$56.15 + 110%); Managerial \$147.40 (\$70.19+ 110%); and 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. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

^c This burden item applies to new facilities only. No new facilities are expected over the three-year period of this ICR.

^d This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. We estimate that 10 percent of the foundries will experience deviations.

^e Cost includes \$335 per facility to certify technical person in VE (EPA Method 9) testing.

^f Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal)

Burden Item	(A) EPA Hours per Occurrence	(B) No. of occurrence s per plant per year	(C) EPA hours per plant per year (A x B)	(D) Plants per year ^a	(E) EPA technical hours per year (C x D)	(F) EPA managerial hours per year (E x 0.05)	(G) EPA clerical hours per year (E x 0.1)	(H) Total cost per year ^b (\$)
Report review								
Initial notification ^c	1	1	1	0	0	0	0	\$0
Notification of compliance status ^c	2	1	2	0	0	0	0	\$0
Annual compliance certification ^d	2	1	2	22	44	2.2	4.4	\$2,405.63
Report of exceedance ^d	2	1	2	22	44	2.2	4.4	\$2,405.63
TOTAL ANNUAL BURDEN^e						100		\$4,810

Assumptions:

^a We have assumed that there are 219 existing facilities that are subject to the rule, and that no new major sources per year will become subject over the 3 year-period of this ICR. We assume that 10 percent of foundries will be required to respond.

^b This cost is based on the average hourly labor rate as follows: Technical \$48.75 (GS-12, Step 1, \$30.47 + 60%); Managerial \$65.71 (GS-13, Step 5, \$41.07 + 60%); and Clerical \$26.38 (GS-6, Step 3, \$16.49 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the 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 government employees.

^c This burden item applies to new facilities only. No new facilities are expected over the three-year period of this ICR.

^d This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. We estimate that 10 percent of the foundries will experience deviations.

^e Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.