

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Renewal), EPA ICR Number 2044.07, OMB Control Number 2060-0537.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) were proposed on: December 4, 2002; promulgated on April 19, 2004; and amended on April 24, 2007. These regulations apply to both existing and new facilities that perform surface coating of plastic parts and products, and that use at least 100 gallons of HAP-containing coatings annually, and where the potential to emit any single hazardous air pollutant (HAP) is greater than or equal to 10 tons per year, or where the potential to emit any combination of HAPS is greater than or equal to 25 tons per year. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart PPPP.

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, hereon in referred to as respondents, of a facilities that apply surface coatings to plastic parts and that are major sources of HAP are subject to the provisions of this part and shall maintain a file containing these documents and retain this file for at least five years following the generation date of such maintenance reports and records. All reports are sent to either the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency's (EPA) regional offices. Delegated authorities may be determined in 40 CFR 63.99.

The estimated respondent burden are is located in Table 9: Annual Estimated Respondent Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Renewal). The Federal Government's burden is attributed entirely to work performed by either Federal employees and may be found below in Table 10: Annual Estimated EPA Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Renewal). There are approximately 223 plastic parts and products surface

coating facilities, which are owned and operated by the surface coating industry.¹ None of the 223 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 regulations.

Based on our consultations with internal industry experts and industry representatives, as discussed in Section 3(c), there are an average of one affected facility 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 223 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

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.

¹ The decrease in the number of respondents from the prior ICR is based on the data provided in EPA’s Enforcement and Compliance History Online (ECHO) database (<https://echo.epa.gov/>) and supported by data collected as part of an inventory for the NESHAP Risk and Technology Review (see <https://www.epa.gov/stationary-sources-air-pollution/surface-coating-plastic-parts-and-products-national-emission>). The decrease in the total number of respondents reflects consolidation within the industry, as further discussed in section 6(f) of this document.

In the Administrator's judgment, HAP emissions from plastic parts and products surface coating operations 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 PPPP.

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 either the Agency or its 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, 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 PPPP.

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 either the delegated state or a local agency. Delegated authorities may be determined in 40 CFR 63.99. 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 30, 2018. No comments were received on the

burden published in the *Federal Register* for this renewal.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. EPA conducted a Risk and Technology Review (RTR) in 2018-2019 and gathered in-depth information about the plastic parts coating industry and facilities subject to Subpart PPPP. That information indicates a significant decrease in the number of respondents subject to requirements under Subpart PPPP. Approximately 223 respondents will be subject to these standards over the three-year period covered by this ICR. This estimate is based on the data provided in EPA's Enforcement and Compliance History Online (ECHO) database and is supported by data collected as part of an inventory for the NESHAP Risk and Technology Review. This reflects a decrease in the total number of respondents due to consolidation within the industry, as further discussed in section 6(f) of this document.

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 Molded Fiberglass Companies, at (440) 997-5851. Neither of these industry representatives responded to our request for information.

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

3(d) Effects of Less-Frequent Collection

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

3(e) General Guidelines

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

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 either 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 these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC and NAICS Codes

The respondents to the recordkeeping and reporting requirements of 40 CFR Subpart PPPP are owners and operators of plastic parts and products surface coating operations. 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 in Table 1. Not all businesses that are classified according to the NAICS or SIC codes shown below are necessarily subject to the requirements of Subpart PPPP; only those that meet the applicability criteria in 40 CFR 63.4481.

Manufacturing Description	SIC Codes	NAICS Codes
Office Furniture (except Wood) Manufacturing	2522	337214
Plastic Furniture and Parts	2599	337215
Polystyrene Foam Product Manufacturing	3086	326140
Urethane and Other Foam Product (except Polystyrene) Manufacturing	3086	326150

All Other Plastics Product Manufacturing	3089	326199
Commercial and Service Industry Machinery Manufacturing	3578, 3579, 3589, 3599	33331, 333318
Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing	3663, 3669, 3679	33422
Hardware, Plastics, Manufacturing	3429	326199
Other Motor Vehicle Parts Manufacturing	3519, 3714	336390
All Other Transportation Equipment Manufacturing	3799	336990
Surgical, Medical, Laboratory Apparatus and Fixtures	3821, 3841	33911
Sporting and Athletic Goods Manufacturing	3949	339920
Sign Manufacturing	3993	339950
All Other Miscellaneous Manufacturing	3069, 3634, 3639, 3999	339999

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP).

A source must make the following reports:

Table 2: Notification	
Notification and Reporting Requirements	40 CFR Part 63 Section
Initial notification	§63.4510(b), §63.5(d), §63.9(b)
Notification of compliance status	§63.4510(c), §63.9(h)
Notification of construction or reconstruction	§63.4510(a), §63.5
Notification of actual startup	§63.4510(a), §63.9(b)
Notification of performance test	§63.4510(a), §63.7(b), §63.8(e), §63.9(e)

Table 3: Reports	
Reporting Requirements	40 CFR Part 63 Section
Semiannual report	§63.4520(a)
Excess emissions report	§§63.4520(a)(4)-(7)
Report of performance test	§63.4520(b)

Table 3: Reports	
Startup, shutdown, malfunction report	§63.4520(c)

A source must keep the following records:

Table 4: Recordkeeping	
Recordkeeping Requirements	40 CFR Part 63 Section
Copies of all notifications and reports	§63.4530(a)
Materials formulation data	§63.4530(b)
HAP content calculations	§63.4530(c)
Names and mass of each material used	§63.4530(d)
HAP mass fractions in each material used	§63.4530(e)
Mass fraction of coating solids in each coating used	§63.4530(f)
Documentation of waste material shipped offsite	§63.4530(g)
Documentation of deviations	§63.4530(h)
Startup, shutdown, and malfunction plan/records	§§63.4530(i)(1)-(2), §63.6(e)
Records of continuous compliance with operating limits	§63.4530(i)(3)
Documentation of capture system efficiency determination	§§63.4530(i)(4)-(5)
Documentation of add-on control device destruction or removal efficiency determination	§63.4530(i)(6)
Documentation of control device performance tests	§§63.4530(i)(6)(i)-(ii), §63.10(b)
Determination of capture system and add-on control operating limits	§63.4530(i)(7)
Work practice plan/records	§63.4530(i)(8)
Five-year retention of records	§63.4531(b), §63.10(b)

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

The activities described in the Respondent Activities table are typical actions that an existing or new source subject to the requirements of NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) might complete in order to comply with the rule.

Table 5: Respondent Activities	Applicable Rules
Familiarization with the regulatory requirements.	§§63.1-15, §§63.4480-4581
Install, calibrate, maintain, and operate CMS for opacity, temperature, gas flow, or pressure drop for capture system, oxidizer, carbon absorber, condenser, or concentrator.	§63.8, §§63.4560-4568
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 24, 25, 25A, 204, 204A, 204B, 204C, 204D, 204E, 204F, 311, or ASTM Method D1475-98, D2697-86, D6093-97 tests, and repeat performance tests if necessary.	§63.7, §§63.4560-4568
Write the notifications and reports listed above.	§§63.9-10, §§63.4510-4520
Enter information required to be recorded above.	§63.10, §63.4530
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.	§§63.9-10, §63.4520
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.	§63.10, §63.4530
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.	§63.10, §63.4520
Train personnel to be able to respond to a collection of information.	§63.10, §63.4530
Transmit, or otherwise disclose the information.	§§63.9-10, §§63.4510-4520

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:

Table 6: Agency Activities	Applicable Rules
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.	§§63.9-10, §§63.4510-4520
Audit facility records.	§63.10, §63.4530
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.	§§63.4510-4530, 42 U.S.C. §7414(a)(1)

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 standards 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. Both the EPA and its delegated authorities can edit, store, retrieve and analyze the data. The burden for these activities is covered under OMB Control No. 2060-0096, Air Stationary Source Compliance and Enforcement Information Reporting.

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

5(c) Small Entity Flexibility

According to the Final Rule notice published in the Federal Register on April 19, 2004 (75 FR 20968), approximately 51 percent of the total number of firms affected by this rule are small entities. While the number of small firms appears to be a large proportion of the total number of affected firms, the small firms experience 21 percent of the total national compliance cost. Therefore, this ICR assumes at least 21 percent of the total affected facilities are owned by small entities.

Although the Final Rule will not have a significant economic impact on a substantial number of small entities, EPA nonetheless has worked aggressively to minimize the impact of the final rule on small entities. EPA solicited input from small entities during the data-gathering phase of the rulemaking. EPA promulgated compliance options that give small entities flexibility in choosing the most cost-effective and least burdensome alternative for their operation. For example, a facility could purchase and use lower or non-HAP coatings, thinners, and cleaning materials (i.e., pollution prevention) that meet the Final Rule rather than being required to purchase add-on control systems. The lower or non-HAP option can be demonstrated with minimum burden by using already-maintained purchase and usage records. No testing of materials would be required as the facility owner could show that their coatings meet the emission limits by providing formulation data supplied by the manufacturer.

EPA also provides one option that allows compliance demonstrations to be conducted on a rolling 12-month basis, meaning that each month the facility would calculate a 12-month organic HAP emission rate for the previous 12 months to determine compliance. This gives affected small entities extra flexibility in complying with the emission limits, since small entities are more likely to use lower monthly volumes and/or a limited number of materials. Furthermore, EPA has promulgated the minimum monitoring, recordkeeping and reporting requirements needed for enforcement and compliance assurance.

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 9: Annual Estimated Respondent Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 9 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.

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 86,400 hours (Total Labor Hours from Table 9 below). These hours are based on Agency studies and background documents from the development of the regulations, 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%).

The total operation and maintenance (O&M) costs for this ICR are \$66,900. The decrease in estimates of capital/startup costs and O&M costs from the previous ICR is due to the decrease in EPA's estimate for the number of sources subject to this regulation. See Section 3(c) and Section 6(f) above for a fuller explanation..

The average annual costs, which are only attributed to the operation and maintenance costs, to industry over the next three years of the ICR is estimated to be \$66,900.

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 \$415,000.

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

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

These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which

this estimate is based appear below at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (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 223 existing respondents will be subject to these standards. It is estimated that no additional respondents will become subject over the three-year period of this ICR. This is a decrease from the previous ICR, in which EPA estimated that 835 existing plastic parts surface coating plants would be subject to these regulations and one new plant per year would become subject. The reasons for the decrease are explained in Section 3(c) above.

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

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

Table 8: Total Estimated 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
Initial notification ^a	0	0	0	0
Notification of compliance status ^a	0	0	0	0
Notification of construction/reconstruction ^a	0	0	0	0
Notification of actual startup ^a	0	0	0	0
Notification of performance test ^a	0	0	0	0
Report of performance test ^a	0	0	0	0
Semiannual report	223	2	0	446
Excess emissions report ^b	223	2	0	446
Startup, shutdown, malfunction report ^c	56	1	0	56
			Total	948

^a EPA estimates that no additional new sources will become subject to the rule over the three-year period of this ICR. These notifications are only required of new sources.

^b EPA assumes that every source will submit an excess emissions report twice per year.

^c EPA has estimated that 25 percent of facilities use add-on controls. EPA assumes that, on average, these

sources will submit a startup, shutdown, and malfunction report once per year.

The total estimated annual labor costs are \$9,840,000. Details regarding these estimates may be found below at the end of this document in Table 9: Annual Estimated Respondent Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (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 9 and 10 at the end of this document, respectively, and summarized below.

(i) Respondent Estimated Burden Hours and Costs

The total annual labor hours are 86,400. Details regarding these estimates may be found in Table : Annual Respondent Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (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 91 hours per response.

The total annual O&M costs to the regulated entity are \$66,900. There were no capital or startup costs for this revision. The cost calculations are detailed in Table 7 located in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) Agency Estimated Burden Hours and Costs

The average annual Agency burden and cost over next three years is estimated to be 8,720 labor hours at a cost of \$415,000; see below in Table 10: Average Annual Estimated EPA Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (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 adjustment decrease in burden from the most recently-approved ICR is due to a decrease in the number of existing major sources subject to this rule. The EPA's current records indicate that there are currently 223 major sources subject to this NESHAP; the previous estimate of 836 major sources was based on the Final Rule for this NESHAP in 2004. The revised estimate is also supported by data collected for the NESHAP Risk and Technology Review. That supporting data is available in the docket for the RTR for Subpart PPPP (www.regulations.gov) at EPA-HQ-OAR-2019-0313. The decrease in the number of respondents is due to multiple factors, including but not limited to: industry consolidation, efficiencies of scale, foreign competition, changes in consumer preferences, new technologies, robotics, and the introduction of low/no HAP coatings. This decrease in the estimated number of sources results in decreases in the respondent labor hours, total O&M costs, and number of responses.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 91 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. Responses to this information collection are mandatory.

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-2012-0688. An electronic version of the public docket is available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal

holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2012-0688 and OMB Control Number 2060-0537 in any correspondence.

Table 9: Annual Estimated Respondent Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Renewal)

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences per year	(C) Person hrs per respondent per year (C=AxB)	(D) Respondent s 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) Cost per year (\$) ^b
1. Reporting requirements								
a. Familiarization with the regulatory requirements	8	1	4	223	1,784	89.2	178.4	\$233,689.73
b. Process/review information	4	4	16	223	3,568	178.4	356.8	\$467,379.46
c. Write reports								
i. Initial notification	2	1	2	0	0	0	0	\$0
ii. Notification of compliance status	2	1	2	0	0	0	0	\$0
iii. Notification of construction/ reconstruction	2	1	2	0	0	0	0	\$0
iv. Notification of actual startup	2	1	2	0	0	0	0	\$0
v. Notification of performance test ^c	2	1.05	2.1	0	0	0	0	\$0
vi. Report of performance test ^c	10	1.05	10.5	0	0	0	0	\$0
vii. Semiannual report ^d	6	2	12	223	2,676	133.8	267.6	\$350,534.59
viii. Excess emissions report	2	2	4	223	892	44.6	89.2	\$116,844.86
ix. Startup, shutdown, malfunction report ^e	2	1	2	56	112.0	5.6	11.2	\$14,671.10
Subtotal for Reporting Requirements						10,387		\$1,183,120
2. Recordkeeping requirements								
a. Familiarization with the regulatory requirements	<i>See 1.a.</i>							
b. Plan activities	12	1	12	223	2,676	133.8	267.6	\$350,534.59
c. Implement activities	12	1	12	223	2,676	133.8	267.6	\$350,534.59
d. Maintain record system for material used	20	1	20	223	4,460	223	446	\$584,224.32

e. Time to enter information								
i. Material usage ^f	0.5	365	182.5	223	40,698	2,034.9	4,070	\$5,331,046.9 2
ii. Compliance calculation ^g	2	12	24	223	5,352	267.6	535.2	\$701,069.18
f. Time to train personnel	10	1	10	223	2,230	111.5	223	\$292,112.16
g. Store, file, and maintain records ^h	2	12	24	223	5,352	267.6	535.2	\$701,069.18
h. Retrieve records/reports ⁱ	1	12	12	223	2,676	133.8	267.6	\$350,534.59
Subtotal for Recordkeeping Requirements						76,037		\$8,661,126
Total Labor Burden and Cost (rounded) ^j						86,400		\$9,840,000
Total Capital and O&M Cost (rounded) ^j								\$66,900
Grand Total (rounded) ^j							p	\$9,910,000

Assumptions:

^a We have assumed that there are approximately 223 respondents, with no additional new sources becoming subject to the rule over the three-year period of this ICR.

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

^c We have assumed that 5 percent of respondents will repeat the initial performance test due to failure.

^d We assume that each respondent will take 6 hours twice per year to write the semiannual report.

^e It is estimated that 25 percent of facilities using add-on controls submit startup, shutdown, and malfunction report once per year.

^f We assumed that each respondent will take 0.5 hours each day to enter daily records of mass fraction of organic HAP for each coating, thinner, or cleaning material, and mass fraction of coating solids for each coating.

^g We have assumed that each respondent will take 2 hours once per month to enter compliance calculations.

^h We have assumed that each respondent will take 2 hours once per month to store, file and maintain records.

ⁱ We have assumed that each respondent will take 1 hour once per month to retrieve records/reports.

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

Table 10: Annual Estimated EPA Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Renewal)

Burden Item	(A) EPA Person hours per occurrence	(B) Number of occurrence s per year	(C) EPA Person hrs per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person hrs per year (E=CxD)	(F) Manage- ment person hrs per year (F=Ex0.05)	(G) Clerical person hrs per year (G=Ex0.1)	(H) Cost per year (\$) ^b
1. Initial performance test	24	1	24	0	0	0	0	\$0
2. Repeat performance test	24	0.2	4.8	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	0	0	0	0	\$0
c. Notification of construction/reconstruction	8	1	8	0	0	0	0	\$0
d. Notification of actual startup	8	1	8	0	0	0	0	\$0
e. Notification of performance test	8	1.05	8.4	0	0	0	0	\$0
f. Report of performance test	8	1.05	8.4	0	0	0	0	\$0
g. Semiannual report ^c	12	2	24	223	5,352	267.6	535.2	\$292,612.57
h. Excess emissions report ^d	4	2	8	223	1,784	89.2	178.4	\$97,537.52
i. Startup, shutdown, malfunction report	8	1	8	56	448	22.4	44.8	\$24,493.73
Total (rounded): ^e						8,720		\$415,000

Assumptions:

^a We have assumed that there are approximately 223 respondents, with no additional new sources becoming subject to the rule over the three-year period of 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 \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and Clerical rate of \$26.38 (GS-6, Step 3, \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) "2018 General Schedule" which excludes locality rates of pay.

^c We have assumed that it will take 12 hours two times per year to review the semiannual report.

^d We have assumed that it will take 4 hours two times per year to review the excess emissions report.

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