

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (Renewal), EPA ICR Number 2115.07, OMB Control Number 2060-0535.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) were proposed on April 4, 2002, and promulgated on December 11, 2003. These regulations apply to new and existing facilities that: 1) manufacture a miscellaneous coating (including inks, paints, or adhesives described by either Standard Industrial Classification (SIC) codes 285 or 289, or North American Industrial Classification System (NAICS) codes 3255 or 3259); 2) are either located at, or are part of, major sources of hazardous air pollutant (HAP) emissions; 3) process, use, or produce HAP; and 4) are not part of an affected source under another subpart of 40 CFR Part 63. New facilities include those that commenced either construction or reconstruction after April 4, 2002. This information is being collected to assure compliance with 40 CFR Part 63, Subpart HHHHH.

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 there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency's (EPA) regional offices.

As part of a recent inventory of facilities subject to the NESHAP for Miscellaneous Coating Manufacturing by OAQPS, including consultations with industry representatives, a search of the National Emission Inventory (NEI) and EPA's Enforcement and Compliance History Online (ECHO) database (www.echo.epa.gov), and a review of active air emissions permits, there are an estimated 43 facilities subject to the NESHAP. There is 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).

The respondents to this ICR (aka: the “Affected Public”) are privately-owned, for-profit business entities that operate miscellaneous coating manufacturing plants. None of the 43 facilities are owned by either state, local, tribal agencies, or the Federal government. We assume that they will all respond. The ‘burden’ to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (Renewal). The Federal Government’s ‘burden’ 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 Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (Renewal).

Over the next three years, approximately 43 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. The industry growth rate is low. The American Coatings Association’s (ACA) Industry Market Analysis (9th edition, 2014 – 2019) characterized the coating manufacturing industry as ‘mature and low growth’.

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, HAP emissions from miscellaneous coating manufacturers 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 HHHHH.

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 its 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 HHHHH.

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* (84 FR 19777) on May 6, 2019. 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 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 EPA also searched the National Emission Inventory (NEI) and EPA's Enforcement and Compliance History Online (ECHO) database (www.echo.epa.gov). The growth rate for the industry is based on the American Coatings Association's (ACA) Industry Market Analysis (9th edition, 2014 – 2019), which characterized the coating manufacturing industry as mature and low growth. Approximately 43 respondents will be subject to these standards over the three-year period covered by this ICR.

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. 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 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 the 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 Codes

The respondents to the recordkeeping and reporting requirements are the owners, or operators of miscellaneous coating manufacturing facilities. The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standard are listed in the table below:

Standard (40 CFR Part 63, Subpart HHHHH)	SIC Codes	NAICS Codes
Paint, Coating, and Adhesive Manufacturing	2851	325510, 325520
Other Chemical Product and Preparation Manufacturing	2891, 2899	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 Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH).

A source must make the following reports:

Notifications	
Notification and application of construction or reconstruction	§63.9(b)(1)-(5), §63.8070(a)
Initial notification/Notification of initial startup	§63.9(b)(2)-(3), §63.8070(b)

Notifications	
Notification of intent to construct/reconstruct, Notification of actual startup	§63.9(b)(4)-(5), §63.8070(a)
Notification of performance test, test plan, and emission profile	§63.7(b)-(c), §63.9(e), §63.8070(c)
Notification of CMS performance evaluation	§63.8(e)(2), §63.9(g), §63.8070(a)
Notification of compliance status (including performance test results)	§63.9(h), §63.10(d)(2), §63.8075(d)
Notification of process change	§63.8075(e)(8)

Reports	
Pre-compliance report	§63.8075(c)
Semiannual compliance reports:	§63.8075(a)-(b), §63.8075(e)
Startup, shutdown, and malfunction reports	§63.10(d)(5), §63.8075(e)
Deviations/no deviations/out-of-control CMS	§63.8075(e)(6)
No out-of-control CMS	§63.8075(e)(7)
Heat exchange system reports (delay of repair)	§63.104(e), §63.104(f)(2)(i)-(iv), §§63.8030(a)-(e)
Maintenance and inspection reports for storage tank control devices	§§63.999(a)-(c), §63.8075(d)
Equipment leak reports	§63.428, §63.1018, §63.1039
Emissions averaging reports	§63.8075(c)(4)
Performance Test Reports	§63.10(d)(2), §63.8075(d)(2)

A source must keep the following records:

Recordkeeping	
Record retention	§63.10(b), §63.8080(a)
Documentation supporting initial notifications and notifications of compliance status	§63.10(b)(2)(xiv), §63.8080(a)
Startup, shutdown, and malfunction plan	§63.6(e)(3), §63.8080(a)
Records related to startup, shutdown, and malfunction	§§63.6(e)(3)(iii)-(iv), §63.8080(a), §63.998(d)(3), §§63.998(c)(1)(ii)(D)-(G)

Recordkeeping	
Records of performance tests and CMS performance evaluations	§63.10(b)(2)(viii), §63.8080(a)
Records for equipment leaks	§63.1038(b)-(c), §63.8080(a)
Daily schedule or log of each operating scenario	§63.8080(a)
Records for process vessels complying with percent reduction emission limitation	§63.8080(a)
Routine maintenance records for storage tank control devices	§63.998, §63.8080(a)
Maintenance wastewater plan	§63.8080(a)
Results of each CMS and CPMS calibration, validation check, inspection, and maintenance	§§63.10(b)(2)(x)-(xi), §63.998, §63.8000(d)(5), §63.8080(d)
Records for emissions averaging	§63.8080(b)
Records of safety device openings	§63.8080(c)
Records for each CMS and CEMS	§63.8(d), §63.8(f), §§63.10(b)(2)(vi)-(xi), §63.10(c), §63.8080(e)

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 CMS, CEMS, and CPMS for operating limit parameters for emission capture systems and for add-on control devices, if using them to demonstrate compliance.
Perform initial performance test, Reference Method 3, 3A, or 3B, 4, 18, 24, 25/25A or 26/26A, 204, 301, 311, 320, and ASTM D6420-99, 8260, 8270, 1666 or 1671, D2879-83 test, and periodic performance tests.
Write the notifications and reports listed above.
Enter information required to be recorded above.

Respondent Activities
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

The 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. 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 standards. Other facilities are expected to use control device design parameters and operating data, and monitoring data to establish compliance with the final standards. 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. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. The EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

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

5(c) Small Entity Flexibility

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

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below, at the end of this document, in Table 1: Annual Respondent Burden and Cost - NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (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 54,600 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	\$141.06 (\$67.17+ 110%)
Technical	\$120.27 (\$57.27 + 110%)
Clerical	\$58.67 (\$27.94 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

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

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Activity / Process	(B) Capital/Startup Cost for One Respondent	(C) Number of Respondents	(D) Total Capital/ Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Process Vessels	\$30,000	0	\$0	\$16,000	43	\$688,000
Transfer Operations	N/A	N/A	N/A	\$3,100	43	\$133,300
Wastewater Systems	N/A	N/A	N/A	\$2,000	43	\$86,000
Totals (rounded) ^a			\$0			\$907,000

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

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

The total operation and maintenance (O&M) costs for this ICR are \$907,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$907,000. These are the recordkeeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The 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 \$12,400.

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

Managerial	\$66.62 (GS-13, Step 5, \$41.64 + 60%)
Technical	\$49.44 (GS-12, Step 1, \$30.90 + 60%)
Clerical	\$26.75 (GS-6, Step 3, \$16.72 + 60%)

These rates are from the Office of Personnel Management (OPM), 2019 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 Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (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 43 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 43 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	Respondents that keep records but do not submit reports	Existing Respondents That Are Also New Respondents	Respondents (E=A+B+C-D)
1	0	43	0	0	43
2	0	43	0	0	43
3	0	43	0	0	43
Average	0	43	0	0	43

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

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 43.

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

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	0	1	N/A	0
Notification of anticipated startup	0	1	N/A	0
Notification of actual startup	0	1	N/A	0
Notification of applicability of standard	0	1	N/A	0
Emission averaging plan	0	1	N/A	0
Pre-compliance report	0	1	N/A	0
Notification of initial performance test	0	1	N/A	0
Notification of initial CMS performance evaluation	0	1	N/A	0
Notification of compliance status	0	1	N/A	0
Notification of process change ^a	4	1	N/A	4
Semiannual report	43	2	N/A	86
Startup, shutdown, malfunction report ^b	2	1	N/A	2
LDAR report ^c	43	2	N/A	86
Emission averaging report ^d	4	1	N/A	4
			Total (rounded)	182

^a Assumes 10 percent of the facilities will implement process changes each year over the three-year period of this ICR.

^b Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction that is not consistent with the plan.

^c Assumes all facilities will be subject to the equipment leak standards.

^d Assumes that 10 percent of existing facilities will use the emissions averaging reports to comply.

The number of Total Annual Responses is 182.

The total annual labor costs are \$6,330,000. Details regarding these estimates may be found below, at the end of this document, in Table 1: Annual Respondent Burden and Cost - NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (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 54,600 hours (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (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 300 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$907,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 258 labor hours at a cost of \$12,400; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (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. A decrease in the number of respondents resulted in a decrease in the number of responses, hours and costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 300 hours per response. 'Burden' means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

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

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2012-0701. 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-2012-0701 and OMB Control Number 2060-0535 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 Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrence s per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technica l person- hours per year (CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarization with the regulatory requirements ^c	4	1	4	43	172	9	17	\$22,909
B. Required Activities								
Initial CMS performance evaluation ^d	10	1	10	0	0	0	0	\$0
Create Information	See 4							
Gather Existing Information	See 4							
C. Write Reports								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of applicability of standard								
i. Existing sources	2	0	0	0	0	0	0	\$0
ii. New sources	2	1	2	0	0	0	0	\$0
Emissions averaging plan ^e	40	1	40	0	0	0	0	\$0
Pre-compliance report ^f	40	1	40	0	0	0	0	\$0
Notification of performance test/re-test ^g	2	1	2	0	0	0.0	0	\$0
Performance test/re-test report ^g	10	1	10	0	0	0	0	\$0
Notification of initial CMS performance	2	1	1	0	0	0	0	\$0

evaluation ^d								
Notification of compliance status ^g								
i. With performance test	80	1	80	0	0	0	0	\$0
ii. Without performance test	120	1	120	0	0	0	0	\$0
Notification of process change ^h	8	1	8	4	32	2	3	\$4,262
Semi-annual compliance report - no deviations ⁱ	4	2	8	39	312	16	31	\$41,555
Semi-annual compliance report - with deviations ⁱ	12	2	24	4	96	5	10	\$12,786
Startup, shutdown, and malfunction report ^j	8	1	8	2	16	1	2	\$2,131
LDAR report ^k	125	2	250	43	10,750	538	1,075	\$1,431,793
Emissions averaging report ^l	20	1	20	4	80	4	8	\$10,655
Subtotal for Reporting Requirements					13,177			\$1,526,091
4. Recordkeeping requirements								
A. Familiarization with the regulatory requirements	See 3A							
B. Plan activities	N/A							
C. Implement Activities	N/A							
D. Develop record system ^m	40	1	40	0	0	0	0	\$0
E. Develop startup, shutdown, malfunction plan ⁿ	100	1	100	0	0	0	0	\$0
F. Develop QA/QC Plan for CMS ^o	40	1	40	0	0	0	0	\$0
G. Time to enter information								
i. Records of startup, shutdown, and malfunction	1.5	1	1.5	43	65	3	6	\$8,591
ii. Records of CMS data								
a. Record continuously monitored parameters	1	365	365	43	15,695	785	1570	\$2,090,417
b. Compile data	24	2	48	43	2,064	103	206	\$274,904
c. Information for semi-annual reports	16	2	32	43	1,376	69	138	\$183,269
d. LDAR recordkeeping	See 3C							

H. Calibration of CMS	376	1	376	43	16,168	808.4	1,616.8	\$2,153,416
I. Time to train personnel ^{p, q}	40	1	40	0	0	0	0	\$0
J. Refresher course ^q	16	1	16	43	688	34.4	68.8	\$91,635
K. Time for audits	N/A				0	0	0	\$0
Subtotal for Recordkeeping Requirements						41,464		\$4,802,232
Total Labor Burden and Costs (rounded) ^r						54,600		\$6,330,000
Total Capital and O&M Cost (rounded) ^r								\$907,000
Grand Total (rounded) ^r								\$7,240,000

Assumptions:

- ^{a.} There are 43 existing major source facilities subject to the NESHAP. We assume no new sources will become subject during the three-year period of this ICR.
- ^{b.} This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, and \$58.67 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "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.
- ^{c.} Assume all 43 facilities will re-familiarize with the regulatory requirements each year.
- ^{d.} Assumes 10 hours to conduct a CMS performance evaluation and 2 hours to prepare a notification. Initial CMS performance evaluation is only required for new sources.
- ^{e.} Assumes that all existing facilities have complied with the emissions averaging requirements; new facilities are not allowed to use emissions averaging.
- ^{f.} Assumes 50 percent of the new facilities will submit a pre-compliance report.
- ^{g.} Assumes all facilities will comply by submitting engineering calculations and design calculations, and that no facilities will do performance tests.
- ^{h.} Assumes 10 percent of the facilities will implement process changes each year over the three year period of this ICR.
- ^{i.} Assumes 10 percent of the facilities will have deviations and 90% of facilities will have no deviations.
- ^{j.} Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction that is not consistent with the plan.
- ^{k.} Assumes all facilities will be subject to the equipment leak standards. Assume an average of 125 hours per report.
- ^{l.} Assumes that 10 percent of existing facilities will use the emissions averaging reports to comply.
- ^{m.} Assumes 40 hours to develop a record system for recording parameter monitoring information.
- ^{n.} Assumes 80 hours to draft the startup, shutdown, and malfunction plan and another 20 hours of review/revisions, for a total of 100 hours.
- ^{o.} Assumes 40 hours to develop/review the QA/QC plan for the CMS. No QA/QC plan is required for the parameter monitoring systems included in the rule.

^p: Assumes no facilities will use the alternative standard, which requires CEMS and QA/QC plans.

^q: Assumes 40 hours to train personnel and 16 hours for an annual refresher course.

^r: 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 Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (Renewal)

Activity	(A) EPA Hours per Occurrence e	(B) Number of Occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year ^a	(E) Technica l Hours per Year (Cx D)	(F) Managerei al Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.10)	(H) Total cost per year, \$ ^b
Notifications/Reports								
A. Review Notification of Construction/Reconstruction	2	1	2	0	0	0	0	\$0
B. Review Notification of Anticipated Startup	2	1	2	0	0	0	0	\$0
C. Review Notification of Actual Startup	2	1	2	0	0	0	0	\$0
D. Review Notification of Applicability of Standard	2	1	2	0	0	0	0	\$0
E. Review Notification of Initial Performance Test ^c	2	1	2	0	0	0	0	\$0
F. Review Performance Test Report ^c	8	1	8	0	0	0	0	\$0
G. Review Repeat Performance Test Report ^{c,d}	8	1	8	0	0	0	0	\$0
H. Review Notification of Initial CMS Performance Evaluation ^e	2	1	2	0	0	0	0	\$0
I. CMS Performance Evaluation ^e	4	1	4	0	0	0	0	\$0
J. Review Emissions Averaging Plan ^f	12	1	12	0	0	0	0	\$0
K. Review Pre-compliance Report ^g	2	1	2	0	0	0	0	\$0
L. Review Notification of Compliance Status ^h								
i. With performance test	4	1	4	0	0	0	0	\$0
ii. Without performance test	4	1	4	0	0	0	0	\$0
M. Review Notification of Process Change ⁱ	6	1	6	4	24	1.2	2.4	\$1,330.70
N. Review Semiannual Compliance Report ^j								
i. No deviations	2	1	2	39	78	3.9	7.8	\$4,324.7

								9
ii. Deviations	4	1	4	4	16	0.8	1.6	\$887.14
O. Startup, shutdown, and malfunction report ^k	2	1	2	2	4	0.2	0.4	\$221.78
R. LDAR report ^l	2	1	2	43	86	4.3	8.6	\$4,768.36
S. Emissions averaging report ^m	4	1	4	4	16	0.8	1.6	\$887.14
TOTAL (rounded) ⁿ						258		\$12,400

Assumptions:

^a. There are 43 existing major source facilities subject to the NESHAP. No new sources are expected to become subject over the three-year period of this ICR.

^b. This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2019 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. Assumes all facilities will comply by submitting engineering calculations based on: materials usage, materials HAP content, and control efficiency from testing (if applicable). Assumes no facilities will do performance tests.

^d. Assume a 5% failure and re-test rate.

^e. Initial CMS performance evaluation is only required for new sources. Assumes no performance evaluations are required for the parameter monitoring systems included in the rule.

^f. Assumes that all existing facilities have already submitted emissions averaging plans.

^g. Assumes 50 percent of the new facilities will submit a pre-compliance report.

^h. Assumes all facilities will comply by submitting engineering calculations, design calculations, etc. with no performance tests.

ⁱ. Assumes 10 percent of the facilities will implement process changes each year over the three year period of this ICR.

^j. Assumes 10 percent of the facilities will have deviations and 90% of facilities will have no deviations.

^k. Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction that is not consistent with the plan.

^l. Assumes all facilities will be subject to the equipment leak standards.

^m. Assumes that 10 percent of existing facilities will use the emissions averaging reports to comply.

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