

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart III) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart III) (Renewal), EPA ICR Number 2045.08, OMB Control Number 2060-0550.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart III) were proposed on December 24, 2002; promulgated on April 26, 2004; and amended on both December 22, 2006 and April 24, 2007. These regulations apply to new, reconstructed, or existing facilities that apply topcoat to new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks, and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP). New facilities include those that commenced either construction, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart III.

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.

The "Affected Public" are owners or operators of automobile and light-duty truck surface coating facilities. The "burden" to the Affected Public may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart III) (Renewal). The Federal Government's "burden" is attributed entirely to work performed by either Federal employees or government contractors and may be found at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart III) (Renewal).

There are 43 automobile and light-duty truck surface coating facilities, which are owned and operated by the surface coating industry. None of the 43 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, our 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, we estimate that there are 43 automobile and light-duty truck surface coating facilities, which are owned and operated by the surface coating industry, which are subject to the NESHAP for Automobile and Light-duty Truck Surface Coating. 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). None of the 43 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. These estimates, which represent a decrease in the number of respondents from the previously-approved ICR, are based on Agency analyses conducted during the development the Risk and Technology Review for this subpart.

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 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 either 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, hazardous air pollutant (HAP) emissions from automobile and light-duty truck 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 III.

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 these emission standards. Continuous emission monitors are used to ensure compliance with these same 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 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 III.

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 both 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. Approximately 43 respondents will be subject to these same 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 and that these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the American Coatings Association, at (202) 462-6272; 2) the Alliance of Automobile Manufacturers, at (202) 326-5500; and 3) the Mississippi Automotive Manufacturers Association, at (601) 707-5221.

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 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. The EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish both the compliance history of a source and any pattern of non-compliance, and to determine the appropriate level of enforcement action. The EPA has found that the most flagrant violators have violations extending beyond five years. In addition, the 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 automobile and light-duty truck surface coating operations. 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 IIII)	SIC Codes	NAICS Codes
Automobile Manufacturing	3711	336111
Light Truck and Utility Vehicle Manufacturing	3711	336112
Motor Vehicle Body Manufacturing	3711	336211

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart IIII).

A source must make the following reports:

Notifications	
Initial notification	§63.3110(b), §63.5, §63.9(b)
Notification of compliance status	§63.3110(c), §63.9(h)
Notification of construction/reconstruction	§63.9(b), §63.5

Notifications	
Notification of actual startup	§63.3110(a), §63.9(b)
Notification of performance test	§63.3110(a), §63.7(b), §63.8(e), §63.9(e)

Reports	
Semiannual compliance report	§63.3120(a)
Excess emissions report	§§63.3120(a)(4-8)
Performance test report	§63.3120(b), §63.10(d)(2)
Startup, shutdown, malfunction report	§63.3120(c), §63.10(d)(5)

A source must keep the following records:

Recordkeeping	
Copies of notifications and reports	§63.3130(a)
Material formulation data	§63.3130(b)
HAP content calculations	§63.3130(c)
Names and volumes of cleaning materials used	§63.3130(d)
Mass fractions of HAP in each cleaning material used	§63.3130(e)
Density of cleaning materials used	§63.3130(f)
Documentation of deviations	§63.3130(g)
Startup, shutdown, and malfunction plan/records	§63.3130(h), §63.6(e)
Documentation of capture system efficiency determination	§63.3130(i), §63.3130(j)
Documentation of add-on control device destruction or removal efficiency determination	§63.3130(k)
Documentation of control device performance test	§63.3130(k), §63.10(b)
Determination of capture system and add-on control operating limits and compliance	§63.3130(l)
Determination of transfer efficiency	§63.3130(m)
Work practice plan/records	§63.3130(n)
Operating instructions for add-on control devices and CPMS	§63.3130(o)
Records should be retained for 5 years	§63.3131(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

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CPMS for temperature, gas flow, or pressure drop for installed oxidizer, carbon adsorber, condenser, concentrator, or capture system.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 24, 25, 25A, 204, 204A to F, 311, or ASTM Method D1475-98, D2697-86, D5066-91, D5087-02, D5965-02, D6093-97, D6266-00a tests, 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 these 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. 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 at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart IIII) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for both 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 record-keeping and reporting requirements is estimated to be 17,500 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	\$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 standards 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)	(B)	(C)	(D)	(E)	(F)	(G)

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F)
CEM	\$16,000	0	\$0	\$1,200	43	\$51,600
Totals (rounded)			\$0			\$51,600

Note: 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 \$51,600. 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 \$51,600. These are record-keeping 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 \$81,200.

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 at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart III) (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 Respondents ^a	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	43	0	0	43
2	0	43	0	0	43
3	0	43	0	0	43
Average	0	43	0	0	43

^a 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) 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	0	1	0	0
Notification of compliance status	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test ^a	0	1.05	0	0
Report of performance test ^a	0	1.05	0	0
Semiannual report	43	2	0	86

Total Annual Responses				
Excess emission report	43	2	0	86
Startup, shutdown, malfunction report ^b	11	1	0	11
			Total	183

^a This ICR assumes 5 percent of respondents will need to repeat the performance test.

^b This ICR assumes 25 percent of respondents will complete startup, shutdown, malfunction report.

The number of Total Annual Responses is 183.

The total annual labor costs are \$2,020,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart IIII) (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 in Tables 1 and 2 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 17,500. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart IIII) (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, both the annual public reporting and recordkeeping burden for this collection of information is estimated to average 96 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$51,600. 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 1,680 labor hours at a cost of \$81,200; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart IIII) (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

The decrease in burden from the most recently-approved ICR is due to a decrease in the number of sources subject to the rule. This estimate is based on Agency analyses conducted during the development the Risk and Technology Review for this subpart. This decrease in the number of sources leads to a decrease in the number of responses, reporting and recordkeeping hours, and a decrease in the operation and maintenance (O&M) costs as compared with the costs in the previous ICR. The regulations have not changed over the past three years.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 96 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-2012-0690. 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-2012-0690 and OMB Control Number 2060-0550 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 Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart IIII) (Renewal)

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences per year	(C) Person hrs per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person hrs per year (E=CxD)	(F) Manage- ment person hrs per year (F=Ex0.05)	(G) Clerical person hrs per year (G=Ex0.1)	(H) Cost per year (\$) ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
a. Familiarization with the regulatory requirements	4	1	4	43	172	8.6	17	\$22,908.68
b. Required activities								
i. Initial performance test ^c	24	1	24	0	0	0	0	\$0
ii. Repeat performance test ^d	24	0.05	1.2	0	0	0	0	\$0
iii. Compile and process data ^e	4	4	16	43	688	34	69	\$91,634.72
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 ^d	2	1	2	0	0	0	0	\$0
vi. Report of performance test ^d	10	1	10	0	0	0	0	\$0
vii. Semiannual report ^f	6	2	12	43	516	26	52	\$68,726.04
viii. Excess emissions report ^g	2	2	4	43	172	8.6	17	\$22,908.68
ix. Startup, shutdown, malfunction report ^h	2	1	2	11	22	1.1	2.2	\$2,863.59

Subtotal for Reporting Requirements					1,805			\$209,042
4. Recordkeeping requirements								
a. Familiarization with the regulatory requirements	See 3.a.							
b. Plan activities	12	1	12	43	516	26	52	\$68,726.04
c. Implement activities	12	1	12	43	516	26	52	\$68,726.04
d. Maintain record system for material used ⁱ	20	2	40	43	1,720	86	172	\$229,086.80
e. Time to enter information								
i. Material usage ^j	0.5	365	182.5	43	7,848	392	785	\$1,045,208.5 3
ii. Compliance calculation	2	12	24	43	1,032	52	103	\$137,452.08
f. Time to train personnel	10	1	10	43	430	22	43	\$57,271.70
g. Store, file, and maintain records ^k	2	12	24	43	1,032	52	103	\$137,452.08
h. Retrieve records/reports ^l	1	12	12	43	516	26	52	\$68,726.04
Subtotal for Recordkeeping Requirements					15,651			\$1,812,649
Total Labor Burden and Cost (rounded) ^m					17,500			\$2,020,000
Total Capital and O&M Cost (rounded) ^m								\$51,600
Grand Total (rounded) ^m								\$2,070,000

Assumptions:

^a We estimate that 43 existing sources will be subject to the rule over the three-year period of this ICR, and no new sources will become subject.

^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 We assume it will take 24 hours to complete the initial performance test.

^d We assume 5 percent of respondents will need to repeat the performance test.

^e We assume each respondent will take four hours to compile and process data. This will occur four times per year.

^f We assume each respondent will take six hours to complete each semiannual report.

^g We assume each respondent will take two hours to complete excess emissions reports. This will occur two times per year.

- ^{h.} We assume 25 percent of respondents will use add-on controls, and that each will take two hours per year to complete the startup, shutdown, malfunction report.
- ^{i.} We assume it will take each respondent twenty hours to maintain the record system for materials used. This will occur two times per year.
- ^{j.} We assume each respondent will take 30 minutes to enter information on material usage. This will occur 365 times per year.
- ^{k.} We assume it will take each respondent two hours to store, file, and maintain records. This will occur twelve times per year.
- ^{l.} We assume it will take each respondent one hour to retrieve records or reports. This will occur twelve times per year.
- ^{m.} 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 Automobile and Light-duty Truck Surface Coating (40 CFR Part 63, Subpart IIII) (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 ^c	24	1	24	0	0	0	0	\$0
2. Repeat initial performance test ^d	24	0.05	1.2	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 ^d	2	1	2	0	0	0	0	\$0
f. Report of performance test/re-test ^d	8	1	8	0	0	0	0	\$0
g. Semiannual report ^e	12	2	24	43	1,032	52	103	\$57,220.27
h. Excess emissions report ^f	4	2	8	43	344	17	34	\$19,073.42
i. Startup, shutdown, malfunction report ^g	8	1	8	11	88	4.4	9	\$4,879.25
Total (rounded) ^h					1,680			\$81,200

Assumptions:

^a We estimate that 43 existing sources will be subject to the rule over the three-year period of this ICR, and that no new sources will become subject to the standard.

^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 We assume it will take 24 hours to complete the initial performance test review.

^d We assume 5 percent of respondents will need to repeat the performance test.

^e We assume it will take twelve hours to review semiannual reports.

^f We assume it will take four hours to review excess emissions reports. This will occur twice per year.

^g We assume 25 percent of respondents will use add-on controls, and that each report will take eight hours to review.

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