

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) Residual Risk  
and Technology Reviews**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (Amendments),  
EPA ICR Number 1957.09, OMB Control Number 2060-0487.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Coil were proposed on July 18, 2000, promulgated on June 10, 2002, and most recently amended on March 17, 2003. The NESHAP is codified at 40 CFR § Part 63, Subpart SSSS. This supporting statement addresses information collection activities that will be imposed by the NESHAP for Surface Coating of Metal Coils, including activities proposed to be added based on the residual risk and technology review (RTR) required under the Clean Air Act (CAA).

The NESHAP for Surface Coating of Metal Coils applies to each new and existing affected source of HAP emissions at facilities that are major sources and that perform metal coil surface coating. New facilities include those that commenced construction or reconstruction after July 18, 2000.

As part of the RTR for the NESHAP for Surface Coating of Metal Coils, the Environmental Protection Agency (EPA) is not proposing to revise the emission limit requirements. The EPA is proposing to require periodic air emissions testing to measure organic HAP destruction or removal efficiency at the inlet and outlet of the add-on control device, or control device outlet concentration of organic HAP, once every five years for existing and new surface coating affected sources using the emission rate with add-on controls compliance option. The EPA is proposing to revise the startup, shutdown, and malfunction (SSM) provisions of the Maximum Achievable Control Technology (MACT) rule and proposing the use of electronic data reporting for future performance test data submittals, notifications, and reports. This information is being collected to assure compliance with 40 CFR Part 63, Subpart SSSS.

In general, all NESHAP standards require initial notifications, performance tests (if sources are using add-on controls to demonstrate compliance), and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any deviation from an emission limitation (either a numerical emission limit, an operating limit, or an equipment or work practice standard), or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to the NESHAP.

This Information Collection Request (ICR) presents the burden to respondents and the Designated Administrator (i.e., U.S. EPA or a delegated authority) to implement the proposed NESHAP for Surface Coating of Metal Coils amendments. Respondents are owners or operators of existing major sources that perform metal coil surface coating. The requirements described below are the minimum requirements that would be established by the amended NESHAP for Surface Coating of Metal Coils, as proposed. Although the Designated Administrator may choose to impose more stringent requirements, it is assumed for this burden estimate that the implemented plans mirror the NESHAP for Surface Coating of Metal Coils.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain the file for at least 5 years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the EPA regional office.

Based on our search of the National Emission Inventory (NEI) and EPA's Enforcement and Compliance History Online (ECHO) database ([www.echo.epa.gov](http://www.echo.epa.gov)) and a review of active air emissions permits, we estimate that 48 facilities are subject to the NESHAP for Surface Coating of Metal Coils. A complete list of facilities subject to the NESHAP for Surface Coating of Metal Coils is available in the modeling data file, which is available for review in the Docket ID No. EPA-HQ-OAR-2017-0685 for this proposed rulemaking.

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

Over the next 3 years, approximately 48 respondents per year will be subject to the standard, and no additional respondents will become subject to the standard in the next 3 years of the information collection. The industry growth rate is low. The American Coatings Association's (ACA) Industry Market Analysis (9<sup>th</sup> edition, 2014 – 2019) characterized the coil coating market as a mature and low growth. Further, use of powder coating competes with coil coated metal in the appliance and metal furniture markets.

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

The "burden" to the Affected Public may be found below in Tables 1 through 4 of Attachment 1. The proposed cost of this ICR to sources that perform metal coil surface coating is \$256,000 in labor costs and \$558,000 in capital costs, or \$271,000 per year if averaged over the first 3 years after the amendments are final.

The total Agency cost during the first 3 years of the ICR is estimated to be \$25,600 or \$8,530 per year. The "burden" to the Agency may be found below in Tables 5 through 8 of

Attachment 2. The burden includes the cost to Federal EPA and state agencies to implement the proposed amendments.

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is proposing this information collection under its existing CAA authority provided in CAA sections 112 and 114. Section 112 of the CAA requires the EPA to establish NESHAP for major sources of HAP that are listed for regulation under CAA section 112(c). A major source is a stationary source that emits or has the potential to emit more than 10 tons per year of any single HAP or more than 25 tons per year of any combination of HAP. For major sources, the NESHAP includes technology-based standards that must reflect the maximum degree of emission reductions of HAP achievable (after considering cost, energy requirements, and non-air quality health and environmental impacts). In the Administrator's judgment, HAP emissions, including xylenes (isomers and mixtures), glycol ethers, toluene, naphthalene, and isophorone, ethyl benzene, and methyl isobutyl ketone from sources that perform metal coil surface coating operation cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart SSSS in 2003.

Section 112(d)(6) of the CAA requires the EPA to review the technology-based standards and revise them "as necessary (taking into account developments in practices, processes, and control technologies)" no less frequently than every 8 years. In addition, section 112(f) of the CAA requires the EPA to determine whether the emissions limitations provide an ample margin of safety to protect public health. For standards for HAP "classified as a known, probable, or possible human carcinogen" that "do not reduce lifetime excess cancer risks to the individual most exposed to emissions from a source in the category or subcategory to less than 1-in-1 million," the EPA must promulgate residual risk standards for the source category (or subcategory) as necessary to provide an ample margin of safety to protect public health. In doing so, EPA may adopt standards equal to existing standards, if the EPA determines that the existing standards are sufficiently protective. The EPA must also adopt more stringent standards, if necessary, to prevent an adverse environmental effect, but must consider cost, energy, safety, and other relevant factors in doing so. The EPA is proposing amendments to 40 CFR 63, Subpart SSSS to address the results of the residual risk and technology review.

Certain records and reports are necessary for the Administrator to confirm the compliance status of sources subject to NESHAP, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the CAA (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions (40 CFR Part 63, Subpart A). CAA Section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

- (A) Establish and maintain such records;
- (B) make such reports;

(C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

## **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the CAA. The collected information is also used for targeting inspections and as evidence in legal proceedings.

For facilities using the emission rate with add-on control compliance option, performance tests are required to determine an affected facility's initial and ongoing capability to comply with the emission standard. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance. Continuous parameter monitoring systems are used to ensure compliance with the standard at all times.

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

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

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

The EPA is also proposing to amend subpart SSSS to remove an exemption from the emission limitations during periods of SSM and to revise the monitoring, recordkeeping, and reporting requirements that are affected by the amendments to the SSM provisions.

## **3. Nonduplication, Consultations, and Other Collection Criteria**

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

SSSS.

### **3(a) Nonduplication**

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

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

A public notice of this collection is provided in the Federal Register notice of proposed rulemaking entitled, “National Emission Standards for Hazardous Air Pollutants: Metal Can Surface Coating; and Metal Coil Surface Coating Residual Risk and Technology Review”.

### **3(c) Consultations**

The Agency has consulted industry experts (i.e., National Coil Coaters Association, ACA Industry Market Analysis) and internal data sources to project the number of affected facilities and industry growth over the next 3 years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Integrated Compliance Information System (ICIS). ICIS is EPA’s database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency’s internal industry experts. Zero new respondents will be subject to the standard over the three-year period covered by this ICR.

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

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

### **3(d) Effects of Less Frequent Collection**

The frequency of the information collections remains the same in these proposed revisions. Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was

collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

### **3(e) General Guidelines**

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

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

### **3(f) Confidentiality**

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

### **3(g) Sensitive Questions**

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

## **4. The Respondents and the Information Requested**

### **4(a) Respondents/SIC Codes**

The respondents to the recordkeeping and reporting requirements are owners or operators of existing major sources that perform metal coil surface coating. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed below for this source category.

<b>Standard (40 CFR Part 63, Subpart SSSS)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	3479	332812

Gasket, Packing, and Sealing Device Manufacturing	3053	339991
Electrometallurgical Ferroalloy Product Manufacturing	3313	331112
Steel Works, Blast Furnaces (Including Coke Ovens), and Rolling Mills (hot-rolling purchased steel)	3312	331221
Cold-Rolled Steel Sheet, Strip, and Bars	3316	331221
Iron and Steel Pipe and Tube Manufacturing from Purchased Steel	3317	331210
Primary Aluminum Production	3334	331312
Secondary Smelting and Alloying of Aluminum	3341	331314
Aluminum Sheet, Plate, and Foil Manufacturing	3353	331315
Fabricated Structural Metal Manufacturing	3441	332312
Sheet Metal Work Manufacturing	3444	332322
Prefabricated Metal Building and Component Manufacturing	3448	332311
Motor Vehicle Metal Stamping	3465	336370
Electroplating, Plating, Polishing, Anodizing and Coloring	3471	332813
All other Miscellaneous Fabricated Metal Product Manufacturing	3499	332999
Printing Machinery and Equipment Manufacturing	3555	333293
All other Motor Vehicle Parts Manufacturing	3714	336399
Photographic Film, Paper, Plate, and Chemical Manufacturing	3861	325992

#### **4(b) Information Requested**

##### **(i) Data Items**

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

A source must make the following notifications and reports:

<b>Notifications</b>	
Notification and application of construction or reconstruction	§63.5180(b)(1), §§63.9(b)(1)-(3)
Notification of anticipated date of initial startup	§63.5180(b)(2), §63.5180(j), §63.9(b)(4)
Notification to commence construction	§63.5180(b)(2), §63.9(b)(4)
Notification of actual startup	§63.5180(b)(2), §63.9(b)(4)

<b>Notifications</b>	
Notification of intent to construct/reconstruct	§63.5180(b)(2), §§63.9(b)(4)-(5)
Notification of performance tests	§63.5180(c), §63.5180(f), §§63.9(e)-(g)
Notification of compliance status	§63.5180(d), §63.9(h)

<b>Reports</b>	
Report of performance test	§63.5180(e), §63.5180(i), §63.10(d)(2)
Semiannual compliance report of no deviation	§63.5180(g), §63.5180(k), §63.10(e)(5)
Semiannual compliance report of deviation	§63.5180(h)(4)(i), §63.10(e)(5)

A source must keep the following records:

<b>Recordkeeping</b>	
Maintain records of all reports	§§63.5190(a)(1)-(5), §63.5190(c), §63.10(b)(2)

### Electronic Reporting

Currently, respondents using an emission capture system and add-on control device to demonstrate compliance would use monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

The proposed RTR amendments include a requirement that facilities electing to use an add-on control device to comply with the NESHAP would be required to submit initial and periodic performance test results to the EPA through the EPA's CEDRI for data collected using test methods supported by the EPA's ERT. The performance test data would be required to be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT Web site. EPA anticipates that no new metal coil surface coating operations will become subject to the NESHAP in the next 3 years of the information collection. Therefore, no operations will be required to electronically submit initial performance test data via CEDRI in the next 3 years of the information collection. Twenty-one facilities using thirty add-on control devices will be required to conduct periodic performance testing in the next three years due to the proposed RTR amendments. Sources for which construction or reconstruction commenced on or before the date that these proposed amendments were published in the Federal Register, will be required to electronically submit semiannual reports starting 2 years after the effective date of the final rule or once the reporting form for the report has been available in CEDRI for at least 1-



year, whichever date is later.

### (ii) Respondent Activities

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Review current recordkeeping systems and adjust them as needed for the amendments to the SSM provisions.
Install, calibrate, maintain, and operate CPMS for operating limit parameters for emission capture systems and for add-on control devices, if using them to demonstrate compliance.
Perform initial performance test, using applicable methods: Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 18, 24, 25, 25A, 204, 204A, 204B, 204C, 204D, 204E, 204F, 301, 311, ASTM Methods D2697-86, D1475-90, D2111-10 (2015), D2369-10 (2015). Test and repeat performance tests if using an emission capture system and add-on control device to demonstrate compliance.
If owner or operator chooses to account for the mass of organic HAP in wastewater, Reference Method 25D, 301, 305, 624, 625, 1624, 1625.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Electronically submit the required reports via CEDRI, developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.

## 5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

### 5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

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

<b>Agency Activities</b>
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### **5(b) Collection Methodology and Management**

Following notification, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. If a facility is using add-on controls to comply, performance test reports are used by the Agency to discern a source's initial and ongoing capability once every 5 years to comply with the emission standards. Other facilities are expected to use purchase records and manufacturer's documentation of HAP content, based on coating formulation, to establish compliance with the final HAP content limit standards. Facilities are not expected to measure the HAP content of the coatings. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by the proposed regulation must be retained by the owner/operator for 5 years.

### **5(c) Small Entity Flexibility**

A 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. As no incremental costs are expected from this rule, there are no significant economic impacts on a substantial number of small entities from these proposed amendments.

Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown below in Tables 1 through 4 of Attachment 1 - Annual Respondent Burden and Cost - NESHAP for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (Amendments).

## **6. Estimating the Burden and Cost of the Collection**

Tables 1 through 4 of Attachment 1 present an itemization of the burden on the respondents subject to the NESHAP for Surface Coating of Metal Coils for the recordkeeping and reporting requirements in the first 3 years following promulgation of the proposed amendments to the NESHAP. Tables 5 through 8 of Attachment 2 present an itemization of the Agency burden in the first 3 years following promulgation of the proposed amendments to the NESHAP for Surface Coating of Metal Coils. The individual burdens in Tables 1 through 8 of Attachments 1 and 2 are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

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

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

### **6(a) Estimating Respondent Burden**

The average annual incremental burden to industry over the next 3 years is estimated to be 738 labor hours, as shown in Tables 1 through 4 of Attachment 1 - Annual Respondent Burden and Cost - NESHAP for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (Amendments). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

### **6(b) Estimating Respondent Costs**

The information collection activities for sources subject to these requirements are presented in Tables 1 through 4 of Attachment 1 - Annual Respondent Burden and Cost - NESHAP for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (Amendments). The total cost for each respondent activity includes labor costs and capital/startup costs.

#### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$147.40 (\$70.19+ 110%)
Technical	\$117.92 (\$56.15 + 110%)

Clerical            \$57.02 (\$27.15 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

The 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 the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

The proposed RTR amendments will add a testing requirement requiring facilities complying with the standards by using emission capture systems and add-on controls to conduct periodic air emissions performance testing. The periodic performance tests would be conducted on a 5-year cycle corresponding to the renewal period for the facility’s part 70 operating permits. Facilities that have not been performing periodic performance tests would need to complete a test within 3 years of the amended rule’s effective date.

The estimated performance testing costs for measuring destruction efficiency using EPA Method 25 or 25A is \$18,750 per add-on control device. The costs assume that emissions are measured simultaneously at the inlet and outlet of the device to measure destruction or removal efficiency. These costs also assume that emission capture systems meet the design criteria for a permanent total enclosure in EPA Method 204, so that capture efficiency does not need to be measured.

The ACA analysis reported that U.S. coil coating facilities generally have thermal oxidizers to control VOC and HAP emissions. To verify this finding, Part 70 operating permits were collected and reviewed. There are 48 facilities subject to 40 CFR 63 Subpart SSSS. A review of 46 permits revealed that: 5 facilities do not use add-on control devices, 20 facilities use add-on controls and are already required to conduct periodic performance testing for VOC/HAP destruction efficiency, and 21 facilities use add-on controls but are not required to conduct performance testing. These 21 facilities have 30 add-on control devices that will require testing as a result of this amendment. Since it is assumed that 5% of performance tests will need to be repeated, calculations for capital costs for testing include the costs of 30 performance tests plus 2 re-tests in year 3. Nine of the 21 facilities have two add-on control devices, and EPA assumes that both devices will be tested during one visit by the testing company. EPA assumes that the cost of testing is 25% less for the second unit at one site. Assuming the cost for testing one control device is \$18,750, the cost for testing two control devices at one site is  $\$18,750 + \$14,063 = \$32,813$ . (No discount is applied to the repeated tests.) The total costs for testing 32 control devices is shown in the table in section 6(b)(iii) below.

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

Emissions compliance testing costs are treated as capital costs because facilities routinely contract with a testing company to perform the testing. No O&M costs would be assumed to be associated with the periodic testing requirement.

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Performance Testing	(B) Capital/Startup Cost for One Performance Test	(C) Number of Performance Tests	(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)
1	18,750 / 14,063	32	558,000	0	0	0

Note: Nine sources test two control devices each at a cost of \$32,813. Twelve sources test one control device each at a cost of \$18,750. Two re-tests are done at a cost of \$18,750 each.

The total capital/startup costs for this ICR are \$558,000. This is the total of column D in the above table.

### 6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the 3 years of the ICR is estimated to be \$8,530.

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 government employees. Details upon which this estimate is based appear in Tables 5 through 8 of Attachment 2 - Annual Agency Burden and Cost - NESHAP for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (Amendments).

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

Based on our research for this ICR, on average over the next 3 years, approximately 48 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject to the standard in the next 3 years of the information collection. The overall average number of respondents, as shown in the table below, is 5 per year. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

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

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(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	48	0	0	48
2	0	48	0	0	48
3	0	48	0	0	48
Average	0	48	0	0	48

<sup>1</sup> No new respondents include sources with constructed, reconstructed and modified affected facilities.

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

<b>Total Annual Responses, In Year One</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Familiarization with rule requirement <sup>a</sup>	48	1	0	48
Performance test <sup>b</sup>	21	0	0	0
Re-evaluate Startup, shutdown, malfunction plan (due to revision) <sup>c</sup>	48	1	0	48
Become familiar with CEDRI for electronic filing of notifications and reports <sup>d</sup>	48	1	0	48
			<b>Total</b>	<b>144</b>
<b>Total Annual Responses, In Year Two</b>				
Familiarization with rule requirement <sup>a</sup>	48	0	0	0
Performance test <sup>b</sup>	21	0	0	0
Re-evaluate SSM Plan <sup>c</sup>	48	0	0	0
Become familiar with CEDRI <sup>d</sup>	48	0	0	0
			<b>Total</b>	<b>0</b>
<b>Total Annual Responses, In Year Three</b>				
Familiarization with rule requirement <sup>a</sup>	48	0	0	0
Notification of performance test <sup>b</sup>	21 + 2	1	0	23
Performance test <sup>b</sup>	21 + 2	1	0	23
Performance test report <sup>b</sup>	21 + 2	1	0	23
Re-evaluate SSM Plan <sup>c</sup>	48	0	0	0
Become familiar with CEDRI <sup>d</sup>	48	0	0	0
			<b>Total</b>	<b>69</b>

<sup>a</sup> Familiarization with the amended rule requirements will occur only in year one.

<sup>b</sup> The proposed RTR amendments will add a periodic performance testing requirement. The testing requirement would require facilities that comply using emission capture systems and add-on controls to conduct air emissions performance testing, with the first test completed no later than 3 years after the effective date of the revised standards. The EPA estimates that 21 facilities have 30 add-on control devices that are not currently required to perform testing as a condition of their part 70 operating permits. It is assumed that 5% of tests (tests at 2 facilities) will need to be repeated.

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

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

The number of total annual responses in year one is 144. The number of total annual responses in year two is zero. The number of total annual responses in year three is 69.

The average annual labor costs are \$85,000. Details regarding this estimate may be found in Tables 1 through 4 of Attachment 1 - Annual Respondent Burden and Cost - NESHAP for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (Amendments).

## **6(e) Bottom Line Burden Hours and Cost Tables**

### **(i) Respondent Tally**

The average annual proposed labor hour burden for all respondents, over next 3 years, is 738 hours (per year) at an average annual cost of \$85,000 (per year). Details regarding these estimates may be found in Tables 1 through 4 of Attachment 1- Annual Respondent Burden and Cost - NESHAP for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (Amendments).

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 10.4 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$558,000 in the third year of this ICR. 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 proposed Agency labor burden, over next 3 years, is 179 hours (per year) at an average annual cost of \$8,530. Details regarding these estimates may be found in Tables 5 through 8 of Attachment 2 - Annual Agency Burden and Cost - NESHAP for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (Amendments).

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 increase in the labor hours per respondent in this ICR as compared to the previous ICR. This situation is due to four considerations: 1) increased time in year one to become familiar with the amended rules, 2) increased time in year one to re-evaluating previously developed SSM record systems, 3) increased time in year one to become familiar with CEDRI and the electronic reporting form for the semiannual report, and 4) time required for conducting a performance test and reporting the results.

There is an increase in the capital/startup costs as calculated in section 6(b)(iii) compared with the costs in the previous ICR. The requirement for periodic performance testing requires



twenty-one existing facilities to conduct a performance test on thirty add-on control devices, with an estimate of two tests being repeated. These facilities are not currently required to perform testing as a condition of their part 70 operating permits.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 10.4 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.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2017-0685. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1927. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2017-0685 and OMB Control Number 2060-0487 in any correspondence.

### **Part B of the Supporting Statement**

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

**ATTACHMENT 1**

**TABLES 1, 2, 3, and 4**

Tables 1 - 3: Annual Respondent Burden and Cost - NESHAP for Surface Coating of Metal Coil (Amendments) - Years 1-3

Table 4: Summary of Annual Respondent Burden and Cost - NESHAP for Surface Coating of Metal Coil (Amendments)

**ATTACHMENT 2**

**TABLES 5, 6, 7, and 8**

Tables 5 - 7: Annual Agency Burden and Cost - NESHAP for Surface Coating of Metal Coil (Amendments) - Years 1-3

Table 8: Summary of Annual Agency Burden and Cost - NESHAP for Surface Coating of Metal Coil (Amendments)