

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP)  
Residual Risk and Technology Reviews**

**1. Identification of the Information Collection**

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

NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Amendments), EPA ICR Number 2044.08, OMB Control Number 2060-0537.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plastic Parts and Products Surface Coating were proposed on December 4, 2002, promulgated on April 19, 2004, and revised or amended on April 26, 2004, April 20, 2006, December 22, 2006, and April 24, 2007. The NESHAP is codified at 40 CFR Part 63, Subpart PPPP. This supporting statement addresses information collection activities that will be imposed by the NESHAP for Plastic Parts and Products Surface Coating, 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 Plastic Parts and Products Surface Coating applies to each new and existing affected source of HAP emissions at facilities that are major sources and that perform surface coating of plastic parts and products. New facilities include those that commenced construction or reconstruction after December 4, 2002.

As part of the RTR for the NESHAP for Plastic Parts and Products Surface Coating, 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 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 PPPP.

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 Plastic Parts and Products Surface Coating amendments. Respondents are owners or operators of existing major sources that perform surface coating of plastic parts and products. The requirements described below are the minimum requirements that would be established by the amended NESHAP for Plastic Parts and Products Surface Coating, as proposed. Although the Designated Administrator may choose to impose more stringent requirements, it is assumed for this burden estimate that the implemented requirements mirror the NESHAP for Plastic Parts and Products Surface Coating.

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 125 facilities are subject to the NESHAP for Plastic Parts and Products Surface Coating. A complete list of facilities subject to the NESHAP for Plastic Parts and Products Surface Coating is available in the modeling data file, which is available for review in the Docket ID No. EPA-HQ-OAR-2019-0313 for this proposed rulemaking.

All of the affected sources that perform surface coating of plastic parts and products 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 125 respondents per year will be subject to the standard, and no change in the number of respondents subject to the standard is expected 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 plastic parts surface coating market as a mature and low growth industry.

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 surface coating of plastic parts and products is \$344,000 in labor costs and \$57,000 in capital costs, or \$134,000 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 \$2,620 or

\$870 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 from sources that perform surface coating of plastic parts and products 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 PPPP in 2004.

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 Part 63, Subpart PPPP 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 PPPP.

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 PPPP performance test reports be submitted through the EPA's ERT.

The EPA is also proposing to amend Subpart PPPP 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.

Finally, the EPA is proposing to amend Subpart PPPP to require facilities using add-on controls to complete periodic performance tests every 5 years. Some facilities are already required by state permitting authorities or regulations to complete periodic performance tests.

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

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

#### **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: Plastic Parts and Products Surface Coating Residual Risk and Technology Review. The ICR for the final rule will response to any ICR-related questions received.

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

The Agency has consulted industry experts (i.e., American Coatings Association (ACA), 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 surface coating of plastic parts and products. 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 PPPP)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Office Furniture (except Wood) Manufacturing	2522	337214
Polystyrene Foam Product Manufacturing	3086	32614, 32615
All Other Plastics Product Manufacturing	3089, 3999	326199
Office Machinery Manufacturing	3578, 3579	333313
Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing	3663, 3679	33422
All Other Motor Vehicle Parts Manufacturing	3429, 3519, 3599,3714,3799	336399
All Other Transportation Equipment Manufacturing	3799	336999
Laboratory Apparatus and Furniture Manufacturing	2599, 3821, 3841	339111, 339112
Sporting and Athletic Goods Manufacturing	3949, 3069	33992
Sign Manufacturing	3993	33995
All Other Miscellaneous Manufacturing	2499, 3634, 3999	339999

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

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

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

A source must make the following notifications and reports:

<b>Notifications</b>	
Initial notification	§63.4510(b), §63.5(d), §63.9(b)
Notification of compliance status	§63.4510(c), §63.9(h)
Notification of construction or reconstruction	§63.4510(a), §63.5
Notification of actual startup	§63.4510(a), §63.9(b)
Notification of performance test	§63.4510(a), §63.7(b), §63.8(e), §63.9(e)

<b>Reports</b>	
Semiannual report	§63.4520(a)
Excess emissions report	§63.4520(a)(4-7)

<b>Reports</b>	
Report of performance test	§63.4520(b)
Startup, shutdown, malfunction report	§63.4520(c)

A source must keep the following records:

<b>Recordkeeping</b>	
Five-year retention of records	§63.4531(b), §63.10(b)
Material formulation data	§63.4530(b)
Records of HAP content calculations	§63.4530(c)
Copies of notifications and reports	§63.4530(a)
Records of names and mass of materials used	§63.4530(d)
HAP mass fractions in each material used	§63.4530(e)
Coating solids mass fraction in each material used	§63.4530(f)
Density of materials used	§63.4530(b)
Documentation of waste material shipped offsite	§63.4530(g)
Documentation of deviations	§63.4530(h)
Startup, shutdown, and malfunction plan/records	§63.4530(i), §63.6(e)
Records of continuous compliance with operating limits	§63.4530(i)
Documentation of capture system efficiency determination	§63.4530(i)
Documentation of add-on control device destruction or removal efficiency determination	§63.4530(i)
Documentation of control device performance tests	§63.4530(i), §63.10(b)
Determination of capture system and add-on control operating limits	§63.4530(i)
Work practice plan/records	§63.4530(i)

### 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 plastic parts and products 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. We estimate that three facilities using three add-on control devices will be required to conduct periodic performance testing in the next 3 years due to the proposed RTR amendments. Other facilities with add-on controls are estimated to be already required to conduct periodic testing by their state permitting authority. Sources will be required to electronically submit semiannual reports starting 180 days after the effective date of the final rule, or 1 year after the electronic reporting form for the report has been available in CEDRI, whichever date is later.

**(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for temperature, for gas flow, or for pressure drop for oxidizer, carbon absorber, condenser, concentrator, or capture system.
Perform initial performance test, 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, 311, or ASTM Method D1475-13, D2111-10, D2369-10 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 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.
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.

<b>Agency Activities</b>
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, 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 purchase records and manufacturer's documentation of HAP content, based on coating formulation, to establish compliance with the 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

According to the Final Rule notice published in the Federal Register on April 19, 2004 (75 FR 20968), approximately 51 percent of the total number of firms affected by this rule are small entities. However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. As minimal 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 Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (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 Plastic Parts and Products Surface Coating 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 Plastic Parts and Products Surface Coating. 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 1,007 labor hours, as shown in Tables 1 through 4 of Attachment 1 - Annual Respondent Burden and Cost - NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (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 Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (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 \$19,000 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.

Plastic parts and products surface coating facilities may use thermal oxidizers to control

VOC and HAP emissions. There are 125 facilities subject to 40 CFR Part 63 Subpart PPPP. A review of the NEI data for the plastic parts and products surface coating industry identified 16 facilities using add-on controls and 13 are located in states that generally require periodic performance testing for VOC/HAP destruction efficiency. Therefore, we estimated that three facilities using add-on controls are not required to conduct performance testing. These three facilities have three add-on control devices that will require testing as a result of this amendment. Calculations for capital costs for testing include the costs of three performance tests in year three. EPA assumes that 5 percent of performance tests will need to be repeated. However, since the fraction of re-tests ( $3 \times 0.05 = 0.15$ ) rounds down to zero, EPA assumes there will be no re-tests. The total costs for testing three 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)
Performance Testing	\$19,000	3	\$57,000	0	0	\$0
Totals (rounded)			\$57,000			\$0

Note: In year three, three sources test one control device each at a cost of \$19,000. We assume a 5 percent failure rate for the test. Since the fraction of re-tests (0.15) rounds down to zero, we assume no cost for re-tests. Totals have been rounded to three significant figures.

The total capital/startup costs for this ICR are \$57,000. 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 \$870.

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 Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (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 125 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 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.

Number of Respondents					
	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	125	0	0	125
2	0	125	0	0	125
3	0	125	0	0	125
Average	0	125	0	0	125

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

The total number of annual responses per year attributed to these proposed amendments is calculated using the following table:

Total Annual Responses, In Year One				
(A) Information Collection Activity	(B) Number of	(C) Number of	(D) Number of Existing Respondents That	(E) Total Annual Responses

	Respondents	Responses	Keep Records But Do Not Submit Reports	E=(BxC)+D
Familiarization with rule requirement <sup>a</sup>	125	1	0	125
Performance test <sup>b</sup>	3	0	0	0
Re-evaluate Startup, shutdown, malfunction plan (due to revision) <sup>c</sup>	125	1	0	125
Become familiar with CEDRI for electronic filing of notifications and reports <sup>d</sup>	125	1	0	125
			<b>Total</b>	<b>375</b>
<b>Total Annual Responses, In Year Two</b>				
Familiarization with rule requirement <sup>a</sup>	125	0	0	0
Performance test <sup>b</sup>	3	0	0	0
Re-evaluate SSM Plan <sup>c</sup>	125	0	0	0
Become familiar with CEDRI <sup>d</sup>	125	0	0	0
			<b>Total</b>	<b>0</b>
<b>Total Annual Responses, In Year Three</b>				
Familiarization with rule requirement <sup>a</sup>	125	0	0	0
Notification of performance test <sup>b</sup>	3	1	0	3
Performance test <sup>b</sup>	3	1	0	3
Performance test report <sup>b</sup>	3	1	0	3
Re-evaluate SSM Plan <sup>c</sup>	125	0	0	0
Become familiar with CEDRI <sup>d</sup>	125	0	0	0
			<b>Total</b>	<b>9</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 3 facilities have 3 add-on control devices that are not currently required to perform testing as a condition of their part 70 operating permits.

<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 375. The number of total annual responses in year two is zero. The number of total annual responses in year three is 9.

The average annual labor costs are \$115,000. Details regarding this estimate may be found in Tables 1 through 4 of Attachment 1 - Annual Respondent Burden and Cost - NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Amendments).

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

### (i) Respondent Tally

The average annual proposed labor hour burden for all respondents, over the next 3 years, is 1,007 hours (per year) at an average annual cost of \$115,000 (per year). Details regarding

these estimates may be found in Tables 1 through 4 of Attachment 1- Annual Respondent Burden and Cost - NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Amendments).

We assume that burdens for managerial tasks take 5 percent 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 percent 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 7.9 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$57,000 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 18 hours (per year) at an average annual cost of \$870. Details regarding these estimates may be found in Tables 5 through 8 of Attachment 2 - Annual Agency Burden and Cost - NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Amendments).

We assume that burdens for managerial tasks take 5 percent 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 percent 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 in year three 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 three existing facilities to conduct a performance test on three add-on control devices, with an estimate of zero 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 7.9 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-2019-0313. 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-2019-0313 and OMB Control Number 2060-0537 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 Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Amendments) - Years 1-3

Table 4: Summary of Annual Respondent Burden and Cost - NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Amendments)

**ATTACHMENT 2**

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

Tables 5 - 7: Annual Agency Burden and Cost - NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Amendments) - Years 1-3

Table 8: Summary of Annual Agency Burden and Cost - NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Amendments)