

**Table 1: Annual Respondent Burden and Cost – NSPS for Polymeric Coating of Supporting Subs**

Burden Item	(A)	(B)
	Technical person-hours per occurrence	No. of occurrences per respondent per year
1. Applications	N/A	
2. Surveys and studies	N/A	
3. Reporting requirements		
A. Familiarize with the regulatory requirements <sup>c</sup>	1	1
B. Required activities		
Initial performance test	280	1
Repeat performance test <sup>d</sup>	280	1
Monthly compliance test <sup>e</sup>	90	12
C. Create information	See 3B	
D. Gather existing information	See 3E	
E. Write report		
Notification of construction/ reconstruction	2	1
Notification of actual startup	2	1
Notification of initial performance test	2	1
Notification of VOC use at end of initial year <sup>f</sup>	2	1
Report of performance test	See 3B	
Report of monitoring exceedances and non-compliance periods <sup>g</sup>	16	4
Report of no excess emissions <sup>h</sup>	8	2
Report when 1st projected VOC use exceeds cutoff	2	1
Report when 1st actual 12-month VOC use exceeds cutoff <sup>i</sup>	2	1
Notification of changes <sup>j</sup>	4	1
<b>Subtotal for Reporting Requirements</b>		
4. Recordkeeping requirements		
A. Read instructions	See 3A	
B. Plan activities	See 3B	
C. Implement activities	See 3B	
D. Develop record system	N/A	
E. Time to enter information		
Records of startups, shutdowns, malfunctions, etc. <sup>k</sup>	1.5	25
Records of operating parameters <sup>l</sup>	0.25	350
Records of semiannual projected VOC use estimate <sup>m</sup>	1	2
Records of 12-month actual VOC use <sup>m</sup>	1	12
F. Train personnel	N/A	
G. Audits	N/A	
<b>Subtotal for Recordkeeping Requirements</b>		
<b>TOTAL LABOR BURDEN AND COSTS (rounded) <sup>n</sup></b>		
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>n</sup></b>		
<b>GRAND TOTAL (rounded) <sup>n</sup></b>		

**Assumptions:**

- <sup>a</sup> On average, EPA estimates 74 existing plants and 1 new plant per year will be subject to the NSPS over the next 3 years.
- <sup>b</sup> This ICR uses the following labor rates: \$122.66 (technical), \$149.84 (managerial), and \$60.88 (clerical). These rates are for Civilian workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” They have been used in the industry.
- <sup>d</sup> This ICR assumes 20 percent of initial performance tests must be repeated due to failure ( $5 \times 20\% = 1$ ).
- <sup>e</sup> This ICR assumes one coating line per year will demonstrate compliance by the liquid material balance method, which requires a record of material.
- <sup>f</sup> This ICR assumes one plant per year will be required to submit this notification.
- <sup>g</sup> This ICR assumes 20 percent of existing and new plants will report monitoring exceedances or non-compliance periods or reduction, alternative, or coating mix preparation equipment standards.
- <sup>h</sup> This ICR assumes 80 percent of existing and new plants will report no excess emissions ( $74 \times 80\% = 59$ , after rounding).
- <sup>i</sup> This ICR assumes no coating lines at any existing or new plants will exceed the cutoff value.
- <sup>j</sup> This burden applies to new plants and existing plants that modify or reconstruct coating operations or coating mix preparation lines per year.
- <sup>k</sup> This ICR assumes there will be one malfunction or shutdown every 2 weeks over 50 weeks per year, or 25 occurrences per year.
- <sup>l</sup> This ICR assumes operating parameters will be recorded over 350 days per year.
- <sup>m</sup> This assumes 20 percent of existing and new plants will record VOC use estimates ( $74 \times 20\% = 15$ , after rounding).
- <sup>n</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**strates Facilities (40 CFR Part 60, Subpart VVV) (Renewal)**

(C)	(D)	(E)	(F)	(G)	(H)
Technical person-hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>	Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.10)	Total cost per year (\$) <sup>b</sup>
1	74	74	3.7	7.4	\$10,081.76
280	5	1,400	70	140	\$190,736.00
280	1	280	14	28	\$38,147.20
1080	1	1,080	54	108	\$147,139.20
2	5	10	0.5	1	\$1,362.40
2	5	10	0.5	1	\$1,362.40
2	5	10	0.5	1	\$1,362.40
2	1	2	0.1	0.2	\$272.48
64	15	960	48	96	\$130,790.40
16	59	944	47.2	94.4	\$128,610.56
2	2	4	0.2	0.4	\$544.96
2	0	0	0	0	\$0
4	5	20	1	2	\$2,724.80
			<b>5,513</b>		<b>\$653,135</b>
37.5	74	2775	138.75	277.5	\$378,066.00
87.5	74	6,475.00	323.75	647.5	\$882,154.00
2	15	30	1.5	3	\$4,087.20
12	15	180	9	18	\$24,523.20
			<b>10,879</b>		<b>\$1,288,830</b>
			<b>16,400</b>		<b>\$1,940,000</b>
					<b>\$826,000</b>
					<b>\$2,770,000</b>

This ICR assumes 4 existing plants per year will install new coating lines.

from the United States Department of Labor, Bureau of Labor Statistics, September 2020, "Table 2.  
en increased by 110 percent to account for the benefit packages available to those employed by private

3/5/2021

quires monthly compliance testing.

1 a quarterly basis ( $74 \times 20\% = 15$ , after rounding). These plants will comply through either the emission

tion equipment. Per footnote a, EPA estimates 1 new plant per year and 4 existing plants with new coating

r year ( $50/2 = 25$ ).

**Labor Costs**

Managerial	\$149.84
Technical	\$122.66
Clerical	\$60.88

responses    hr/response  
207        79.2

**Table 2: Average Annual EPA Burden and Cost – NSPS for Polymeric Coating of Supporting S**

Burden Item	(A)	(B)	(C)
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (C=AxB)
New facilities			
Notification of construction/ reconstruction	2	1	2
Notification of actual startup	2	1	2
Notification of initial performance test	2	1	2
Notification of VOC use at end of initial year	2	1	2
Performance test results	8	1	8
New and existing facilities			
Report of monitoring exceedances and non-compliance periods <sup>c</sup>	8	4	32
Report of no excess emissions <sup>d</sup>	2	2	4
Report when 1st projected VOC use exceeds cutoff	2	1	2
Report when 1st actual 12-month VOC use exceeds cutoff <sup>e</sup>	2	1	2
Notification of changes <sup>f</sup>	2	1	2
<b>TOTAL (rounded) <sup>g</sup></b>			

**Assumptions:**

<sup>a</sup> On average, EPA estimates 74 existing plants and 1 new plant per year will be subject to the NSPS over the 3-year period lines.

<sup>b</sup> This ICR uses the following labor rates: \$51.23 (technical), \$69.04 (managerial), and \$27.73 (clerical). These rates are 1 excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to

<sup>c</sup> This ICR assumes 20 percent of existing and new plants will report monitoring exceedances or non-compliance periods though either the emission reduction, alternative, or coating mix preparation equipment standards.

<sup>d</sup> This ICR assumes 80 percent of existing and new plants will report no excess emissions (74×80% = 59, after rounding).

<sup>e</sup> This ICR assumes no coating lines at any existing or new plants will exceed the cutoff value.

<sup>f</sup> This burden applies to new plants and existing plants that modify or reconstruct coating operations or coating mix preparation existing plants with new coating lines per year.

<sup>g</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal)**

(D)	(E)	(F)	(G)	(H)
Respondents per year <sup>a</sup>	Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.10)	Total cost per year (\$) <sup>b</sup>
5	10	0.5	1	\$574.55
5	10	0.5	1	\$574.55
5	10	0.5	1	\$574.55
1	2	0.1	0.2	\$114.91
5	40	2	4	\$2,298.20
15	480	24	48	\$27,578.40
59	236	11.8	23.6	\$13,559.38
2	4	0.2	0.4	\$229.82
0	0	0	0	\$0
5	10	0.5	1	\$574.55
		<b>922</b>		<b>\$46,100</b>

Labor Rates	
Managerial	\$69.04
Technical	\$51.23
Clerical	\$27.73

d of this ICR. This ICR assumes 4 existing plants per year will install new coating

from the Office of Personnel Management (OPM), 2021 General Schedule, which is for government employees.

on a quarterly basis ( $74 \times 20\% = 15$ , after rounding). These plants will comply

ration equipment. Per footnote a, EPA estimates 1 new plant per year and 4

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>					
(A)	(B)	(C)	(D)	(E)	(F)
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
VOC Monitor	\$40,000	1	\$40,000	\$8,500	74
Temperature Monitor	\$8,500	1	\$8,500	\$2,000	74
<b>Total</b>			<b>\$48,500</b>		

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents <sup>1</sup>	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
1	5	72	0	4	73
2	5	73	0	4	74
3	5	74	0	4	75
<b>Average</b>	<b>5</b>	<b>73</b>	<b>0</b>	<b>4</b>	<b>74</b>

<b>Total Annual Responses</b>				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	5	1	0	5
Notification of actual startup	5	1	0	5
Notification of initial performance test	5	1	0	5
Notification of VOC use at end of initial year	1	1	0	1
Report of performance test	5	1	0	5
Report of repeat performance test	1	1	0	1

Report of monitoring exceedances and non-compliance periods	15	4	0	60
Report of no excess emissions	59	2	0	118
Report when 1st projected VOC use exceeds cutoff	2	1	0	2
Report when 1st actual 12-month VOC use exceeds cutoff	0	1	0	0
Notification of changes	5	1	0	5
			<b>Total</b>	<b>207</b>

(G)
Total O&M, (ExF)
\$629,000
\$148,000
<b>\$777,000</b>
<b>\$826,000</b>