

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal), EPA ICR Number 1952.10, OMB Control Number 2060-0518.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) were proposed on April 24, 2002; promulgated on May 23, 2003; and most-recently amended on March 15, 2019, at 85 FR 41100, and November 19, 2020, at 85 FR 73908¹. These regulations apply to existing facilities and new facilities that perform metal furniture surface coating operations where the total Hazardous Air Pollutants (HAPs) emitted are greater than or equal to 10 tons per year of any one HAP, or where the total HAPs emitted are greater than or equal to 25 tons per year of any combination of HAPs. New facilities include those that commenced either construction, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart RRRR.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. If there is no such delegated authority, the EPA regional office can review them. All other reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the EPA regional offices. The use of the term

¹ The most recent amendments at 85 FR 41100 include amendments to address emissions during periods of startup, shutdown, and malfunction (SSM); electronic reporting of performance test results and compliance reports; the addition of EPA Method 18 and updates to several measurement methods; and the addition of requirements for periodic performance testing. The most recent amendments at 85 FR 73854 include notification and recordkeeping requirements that apply to sources choosing to reclassify to area source status and to sources that revert to major source status, including a requirement for electronic notification.

"Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority, such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

The “burden” to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal). The Federal Government’s “burden” is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal). These metal furniture surface coating facilities are owned and operated by the metal furniture surface coating industry. None of the facilities in the United States are owned by either state, local, or tribal entities or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Based on our search of the National Emission Inventory (NEI), EPA’s Enforcement and Compliance History Online (ECHO) database (www.echo.epa.gov), and a review of active air emissions permits conducted for the March 15, 2019 RTR, we estimate that: 16 facilities are subject to the Metal Furniture NESHAP, there is an average of one affected facility at each plant site, and each plant site has only one respondent (i.e., the owner/operator of the plant site). Over the next three years, approximately 16 respondents per year will be subject to these standards, and no additional respondents per year will become subject to the se same standards.

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

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

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

and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, hazardous air pollutant emissions from furniture surface coating facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart RRRR.

2(b) Practical Utility/Users of the Data

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

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with these standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and that these standards are being met. The performance test may also be observed.

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

Additionally, the EPA is requiring electronic reporting for certain notifications or reports. The EPA is requiring that owners or operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b), change in information required in 40 CFR 63.9(j), notifications of compliance status required in 40 CFR 63.4921(b), performance test reports required in 40 CFR 63.4921(a)(1), and semiannual reports required in 40 CFR 63.4921(c) through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For semiannual reports, EPA has developed a template for the reporting form in CEDRI specifically for 40 CFR Part 63, Subpart RRRR. For the notifications required in 40 CFR 63.9(b) and 63.9(j) and 40 CFR 63.4921(b), owners and operators would be required to upload a PDF of the required notifications.

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests. The EPA is also requiring that 40 CFR Part 63, Subpart RRRR performance test reports be submitted through the EPA's ERT.

3. Non-duplication, Consultations, and Other Collection Criteria

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

3(a) Non-duplication

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as for state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, 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 standards to implement the Federal standards, a copy of the report submitted to either the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

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

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (86 FR 19256) on April 13, 2021. No comments were received on the burden published in the *Federal Register* for this renewal.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 16 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and that these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Powder Coating Institute, at (859) 525-9988, and the American Coatings Association, at (202) 462-6272.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

3(d) Effects of Less-Frequent Collection

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

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

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. The EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows the EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. The EPA has found that the most flagrant violators have violations extending beyond five years. In addition, 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 (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are metal furniture surface coating facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by these standards and the corresponding North American Industry Classification System (NAICS) codes are listed below:

Standard (40 CFR Part 63, Subpart RRRR)	SIC Codes	NAICS Codes
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Metal household furniture manufacturing	2514	337124
Office furniture (except wood) manufacturing	2522	337214
Institutional furniture manufacturing	2531, 2599, 3999	337127
Showcase, partition, shelving, and locker manufacturing	2542, 3499, 3429	337215
Hardware manufacturing		332951
Metal stamping	3469	332119
Spring (light gauge) manufacturing	3495	332613
Residential electric lighting fixture manufacturing	3645, 3999	335121
Commercial, industrial, and institutional electric lighting fixture manufacturing	3646	335122
Laboratory apparatus and furniture manufacturing	3821, 3841	337127
Dental Equipment and Supplies Manufacturing	3843	339114
Reupholstery and furniture repair	7641	811420
Correctional institutions that apply coatings to metal furniture	9223	922140

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR).

A source must make the following reports:

Notifications	
Notification of intent to construct or reconstruct	§63.9(b)
Initial notification	§63.9(b), §63.4910(b)
Notification of anticipated startup	§63.9(b), §63.4910
Notification of actual startup	§63.9(b), §63.4910
Request for extension of compliance date	§63.9(c)
Notification of performance test	§63.9(e), §63.4910(a)
Notification of compliance status (electronic submission)	§63.9(h), §63.4910(c)
Notification of changes in information (reclassification to area source status or to revert to major source status) (electronic submission)	§63.9(b), §63.9(j)

Reports	
Semiannual report (includes monthly compliance demonstrations)	§63.4920(a), §63.4942,

Reports	
	§63.4952, §63.4962,
Performance test reports (electronic submission)	§63.4920(b), §63.4921(a)

A source must keep the following records:

Recordkeeping	
Copies of notifications and reports	§63.4930(a)
Material formulation data	§63.4930(b)
Records of compliance option used and compliance calculations	§63.4930(c)
Names and volumes of each material used	§63.4930(d)
Mass fraction of organic HAP in each material used	§63.4930(e)
Coating solids fraction in each material used	§63.4930(f)
Density of each material used	§63.4930(g)
Documentation of waste material shipped offsite	§63.4930(h)
Deviation records	§63.4930(j)
Documentation of emission capture system and add-on control device performance tests, and records to show continuous compliance with operating limits	§63.4930(k)
Records submitted electronically via CEDRI may be kept electronically	§63.4930(l)
Five-year retention of records	§63.4931(b)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

The rule was recently amended to include electronic reporting provisions on March 15, 2019 and November 19, 2020. Respondents are required to use the EPA's Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. Also, respondents are required to submit electronic copies of notifications and certain reports through

EPA’s CEDRI. The notification is an upload of their currently required notification in portable document format (PDF) file. The semiannual reports are to be created using Form 5900-0528, the electronic template included with this Supporting Statement. The template is an Excel spreadsheet which can be partially completed and saved for subsequent semiannual reports to limit some of the repetitive data entry. It reflects the reporting elements required by the rule and does not impose additional reporting elements. The OMB Control Number is displayed on the Welcome page of the template, with a link to an online repository that contains the PRA requirements. For purposes of this ICR, it is assumed that there is no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CPMS for gas volumetric flow rate, duct static pressure for oxidizer, carbon adsorber, condenser, concentrator, or capture system.
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, 311, or ASTM Method D1475-13, D2111-10 (2015), D2369-10 (2015), D2697–86, D6093-97 tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Electronically submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

Management

5(a) Agency Activities

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

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. If a facility is using add-on controls to comply, performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standards. Other facilities are expected to use 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. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, and the EPA's regional offices, and headquarters. The EPA and its delegated authorities can edit, store, retrieve and analyze the data.

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

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of these regulations. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the

minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of ‘Burden’ under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 4,270 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulations, Agency knowledge and experience with the NESHAP program, the previously-approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$153.55 (\$73.12 + 110%)
Technical	\$122.20 (\$58.19 + 110%)
Clerical	\$61.51 (\$29.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, “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(s) are both labor costs, which are addressed elsewhere in this ICR, and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to these regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M ^a	(G) Total O&M, (E X F)
Testing for Add-on Control Device	\$19,000	0	\$0			
CEM				\$1,200	0	\$0
Total			\$0			\$0

^a No respondents use add-on controls or monitoring devices to establish compliance with the emission standards.

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

The total operation and maintenance (O&M) costs for this ICR are \$0. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$0. These are the recordkeeping costs.

6(c) Estimating Agency Burden and Cost

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

The average annual Agency cost during the three years of the ICR is estimated to be \$25,700.

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

Managerial	\$69.04 (GS-13, Step 5, \$43.15 + 60%)
Technical	\$51.23 (GS-12, Step 1, \$32.02 + 60%)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 16 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 16 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(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	16	0	0	16
2	0	16	0	0	16
3	0	16	0	0	16
Average	0	16	0	0	16

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

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 16.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Initial notification	0	1	0	0
Notification of initial	0	1	0	0

Total Annual Responses				
compliance				
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test	0	1	0	0
Report of performance test	0	1	0	0
Excess emissions report	16	0.5	0	8
Semiannual report	16	2	0	32
			Total	40

The number of Total Annual Responses is 40.

The total annual labor costs are \$505,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 4,270 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 107 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 515 labor hours at a cost of \$25,700; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

6(f) Reasons for Change in Burden

There is a decrease in burden from the most-recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This ICR incorporates the requirements from the March 2019 and November 2020 rules. The decrease is due to two considerations. Since a previous ICR renewal, 1952.06, was published in 2016, sources have changed their coating practices to use non-HAP coatings, thus resulting in a decrease in the number of respondents. The data gathered during the recent rulemaking indicates that there are no sources using add-on controls, resulting in a decrease in O&M costs. There is no growth in this industry, therefore there is no capital/startup costs. This ICR also reflects the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (March 2021) to calculate respondent burden costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 107 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

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

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2021-0107. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the

contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. Due to COVID-19 precautions, entry to the Reading Room is available by appointment only. Please contact personnel in the Reading Room to schedule an appointment. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2021-0107 and OMB Control Number 2060-0518 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal)

Burden Item	(A) Person- hours per occurrence	(B) Number of occurrences per year	(C) Person-hrs. per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person-hrs. per year (E=CxD)	(F) Managemen t person-hrs. per year (F=Ex0.05)	(G) Clerical person-hrs. per year (G=Ex0.1)	(H) Annual costs (\$) ^b
1. Reporting requirements								
A. Familiarize with rule requirements	4	1	4	16	64	3.2	6.4	\$8,705.82
B. Process/review information	4	4	16	16	256	12.8	25.6	\$34,823.30
C. Plan Activities - Training ^c	10	1	10	16	160	8	16	\$21,764.56
D. Add-on Control Performance Test ^d	8	1	8	0	0	0	0	\$0
E. Write reports								
i. Initial notification	2	1	2	0	0	0	0	\$0
ii. Notification of initial compliance	2	1	2	0	0	0	0	\$0
iii. Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
iv. Notification of actual startup	2	1	2	0	0	0	0	\$0
v. Notification of performance test ^d	2	1	2	0	0	0	0	\$0
vi. Report of performance test ^d	16	1	16	0	0	0	0	\$0
vii. Excess emissions report	4	0.5	2	16	32	1.6	3.2	\$4,353
viii. Semiannual report ^e	8	2	16	16	256	12.8	25.6	\$34,823.30
Subtotal for Reporting Requirements						883		\$104,470
2. Recordkeeping requirements								
A. Familiarize with rule requirements	See 1.A							
B. Plan activities	See 1.C							
C. Implement activities	See 1.C							
D. Maintain record system for material used	20	1	20	16	320	16	32	\$43,529.12
E Time to enter information								
i. Material usage ^f	2	52	104	16	1,664	83.2	166.4	\$226,351.42
ii. Compliance calculation ^g	2	12	24	16	384	19.2	38.4	\$52,234.94

F. Time to train personnel	See 1.C							
G. Store, file, and maintain records	2	12	24	16	384	19.2	38.4	\$52,234.94
H Retrieve records/reports	1	12	12	16	192	9.6	19.2	\$26,117.47
Subtotal for Recordkeeping Requirements						3,386		\$400,468
Total Labor Burden and Costs (rounded)^h						4,270		\$505,000
Total Capital and O&M Cost (rounded)^h								\$0
GRAND TOTAL^h								\$505,000

Assumptions:

^a We have assumed that there are approximately 16 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years.

^b This ICR uses the following labor rates: Managerial \$153.55 (\$73.12+ 110%); Technical \$122.20 (\$58.19 + 110%); and Clerical \$61.51 (\$29.29 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c We assume each respondent will take ten hours, once per year to plan activities and train staff.

^d Facilities that comply using emission capture systems and add-on controls conduct air emissions performance testing. There are no Surface Coating of Metal Furniture facilities (Subpart RRRR) using add-on controls to comply. We do not anticipate any facilities in this industry to have performance testing costs.

^e We have assumed that each respondent will take eight hours twice per year to complete the semiannual report. The semiannual report includes all compliance reports for that period.

^f We have assumed that each respondent will take 1 hour twice per week to enter information.

^g We have assumed that each respondent will have to calculate compliance once per month. Compliance reports for the six-month period are filed with the semiannual report.

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

Table 2: Average Annual EPA Burden and Cost – NESHAP for Metal Furniture Surface Coating (40 CFR Part 63, Subpart RRRR) (Renewal)

Burden Item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA Hours per Occurrence	Number of Occurrences Per Year	EPA Person Hours Per Year (A x B)	Plants Per Year ^a	Technical Hours Per Year (C x D)	Management Hours Per Year (E x 0.05)	Clerical Hours Per Year (E x 0.10)	Total Cost Per Year (\$) ^b
1. Initial performance test ^{c, d}	24	1	24	0	0	0	0	\$0
2. Repeat performance test ^d	24	0.2	4.8	0	0	0	0	\$0
3. Report review								
a) Initial notification	4	1	4	0	0	0	0	\$0
b) Notification of performance test ^e	4	1	4	0	0	0	0	\$0
c) Notification of initial compliance	8	1	8	0	0	0	0	\$0
d) Notification of construction/reconstruction	8	1	8	0	0	0	0	\$0
e) Notification of actual startup	8	1	8	0	0	0	0	\$0
g) Report of performance test ^f	8	1	8	0	0	0	0	\$0
h) Excess emissions report	8	0.5	4	16	64	3.2	6.4	\$3,677
i) Semiannual report and compliance reports ^g	12	2	24	16	384	19.2	38.4	\$22,062.72
Total (rounded)^h						515		\$25,700

Assumptions:

^a We have assumed that there are approximately 16 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years.

^b This cost is based on the average hourly labor rate as follows: Managerial \$69.04 (GS-13, Step 5, \$43.15 + 60%); Technical \$51.23 (GS-12, Step 1, \$32.02 + 60%); and Clerical \$27.73 (GS-6, Step 3, \$17.33 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

^c The current ICR assumes it will take 24 hours to complete the task for each respondent.

^d Facilities that comply using emission capture systems and add-on controls conduct air emissions performance testing. No sources use emission capture systems and add-on controls.

^e We assume it will take four hours to review the notification of the test and the test plan for each respondent.

^f We assume it will take eight hours to review the test report for each respondent.

^g We assume it will take twelve hours to review the semiannual reports for each respondent. The semiannual reports include the monthly compliance reports for that period.

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

**Appendix A – Draft Electronic Reporting Template
(see Docket ID Number EPA-HQ-OAR-2021-0107)**