

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for the Surface Coating of Large Household and Commercial Appliances
(40 CFR Part 63, Subpart NNNN) (Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (Renewal), EPA ICR Number 1954.10, OMB Control Number 2060-0457.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) were proposed on December 22, 2000; promulgated on July 23, 2002; and amended on: April 20, 2006 (71 FR 20465), March 15, 2019 (84 FR 9611), July 8, 2020 (85 FR 41100), and November 19, 2020 (85 FR 73854)¹. These regulations apply to both existing and new facilities that perform surface coating of large household and commercial appliances and related parts² 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 construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart NNNN.

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 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 NESHAP.

¹ The recent amendments at 84 FR 9611 include: amendments to address emissions during periods of startup, shutdown, and malfunction (SSM), add electronic reporting for performance test results and compliance reports, adding EPA Method 18 and updates to several measurement methods, add the addition of requirements for periodic performance testing, and make technical and editorial changes. The amendment at 85 FR 41100 finalized technical corrections to the rule. 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.

² The Surface Coating of Large Appliances NESHAP (40 CFR 63.4081) defines a “large appliance part or product” as “a component of a large appliance product manufactured for household, recreational, institutional, commercial, or industrial use” including but not limited to “cooking equipment; refrigerators, freezers, and refrigerated cabinets and cases; laundry equipment; dishwashers, trash compactors, and water heaters; and heating, ventilation, and air-conditioning (HVAC) units, air-conditioning (except motor vehicle) units, air-conditioning and heating combination units, comfort furnaces, and electric heat pumps. Specifically excluded are heat transfer coils and large commercial and industrial chillers.”

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. In the event that 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. In the event that there is no such delegated authority, the reports are sent directly to the EPA regional offices. The use of the term "Designated Administrator" throughout this document refers to either 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 "Affected Public" include facilities that perform surface coating of large appliance products. The 'burden' to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (Renewal). The 'burden' to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and can be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (Renewal). None of the 10 facilities in the United States are owned by either state, local, 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 consultations with industry representatives, there is an average of one affected facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 10 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. The estimate is based on EPA's recent reevaluation of the source category inventory associated with the recently-finalized amendments to 40 CFR part 63, subpart NNNN.³

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

³ The final amendments were signed on March 15, 2019 at 84 FR 9611 and are available at: <https://www.govinfo.gov/content/pkg/FR-2019-03-15/pdf/2019-03560.pdf>.

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 household and commercial appliance 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 NNNN.

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.

For facilities using the emission rate with add-on control compliance option, performance tests are required in order to determine an affected facility's initial capability to comply with these emission standards. 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), notifications of change in information already provided in 40 CFR 63.9(j), notifications of compliance status required in 40 CFR 63.4121(b), performance test reports required in 40 CFR 63.4121(a)(1), and semiannual compliance reports required in 40 CFR 63.4121(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 NNNN. For the notifications required in 40 CFR 63.9(b), 63.9(j), and 63.4121(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 NNNN 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 NNNN.

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 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 either 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 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 10 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 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 these standards. The EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish 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 either the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made

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

3(g) Sensitive Questions

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

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are facilities that perform surface coating of large household and commercial appliances and related parts. 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 for this source category:

Standard (40 CFR Part 63, Subpart NNNN)	SIC Codes	NAICS Codes
Household Cooking Equipment	3631	335220
Household Refrigerators and Home and Farm Freezers	3632	335220
Household Laundry Equipment	3633	335220
Household Appliances	3639	335220
Commercial Laundry, Drycleaning, and Pressing Machines	3582	333318
Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment	3585	333415
Service Industry Machinery (e.g., commercial dishwashers, ovens, and ranges, etc.)	3589	333318 ^a

^a Excluding special industry machinery, industrial and commercial machinery and equipment, and electrical machinery equipment and supplies not elsewhere classified.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for the Surface Coating of Large Appliances (40 CFR Part 63, Subpart NNNN).

A source must make the following reports:

Notifications	
Notification of intent to construct or reconstruct	§63.9(b)
Initial notification	§63.9(b), §63.4110(a)(1)
Notification of actual startup	§63.9(b), §63.4110(a)
Request for extension of compliance date	§63.9(c), §63.4110(a)
Notification of performance test	§63.9(e), §63.4110(a)
Notification of compliance status	§63.9(h), §63.4110(a)(2), §63.4110(b), §63.4121(b)
Initial notifications for an area source reclassifying to major source (electronic submittal)	§63.9(b), §63.4121(b)
Notification of change in information already provided for major source to area source reclassification (electronic submittal)	§63.9(j)

Reports	
Semiannual compliance report	§§63.4120(a)-(h), §63.4121(c)
Deviations from emission limitations	§§63.4120(c)-(g)
Performance test reports (electronic submission)	§63.10(d)(2), §63.4120(h), §63.4121(a)

A source must keep the following records:

Recordkeeping	
Copies of notifications and reports	§ 63.4130(a)
Material formulation data	§ 63.4130(b)
Records of compliance option used and compliance calculations	§ 63.4130(c)
Names and volumes of each material used	§ 63.4130(d)
Mass fraction of organic HAP in each material used	§ 63.4130(e)
Coating solids volume fraction in each material used	§ 63.4130(f)
Density of each material used	§ 63.4130(g)
Documentation of waste material shipped offsite	§ 63.4130(h)
Deviation records	§ 63.4130(j)
Documentation of emission capture system and add-on control device performance tests, and records to show continuous compliance with operating limits	§ 63.4130(k)

Recordkeeping	
Records submitted via CEDRI may be kept electronically	§ 63.4131(a)
Five-year retention of records	§ 63.4131(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 (84 FR 9611) and November 19, 2020 (85 FR 73854). 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. Respondents are also 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 5900-564, 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 temperature, gas flow, or pressure drop for oxidizer, carbon adsorber, condense, concentrator, or capture system.

Respondent Activities
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 (2015), D2369-10 (2015), D2697-03 (2014), D6093-97 (2016) test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

5(a) Agency Activities

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

Agency Activities
Observe initial performance tests, repeat performance tests, and periodic performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the 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 standard and note the operating conditions under which compliance was achieved. 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. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

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

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

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses), however, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

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

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 4,380 hours (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously-approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$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 standards are both labor costs, which are addressed elsewhere in this ICR, and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to these regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and such other costs as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A)	(B)	(C)	(D)	(E)	(F)	(G)

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 ^a	Number of Respondents with O&M ^b	Total O&M, (E X F)
Continuous Monitoring Device	\$16,000	0	\$0	\$6,354	1	\$6,354
Total (rounded) ^c			\$0			\$6,350

^a Comments received from Whirlpool Corporation during industry consultation suggested that annual O&M cost can vary from 24 to 80 hours at a technician's pay grade. To calculate annual O&M costs, an average of 52 hours was assumed and multiplied by the technical labor rate of \$122.20.

^b Permit data indicates that only one affected source uses an emission control device to comply with the NESHAP.

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

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

The total operation and maintenance (O&M) costs for this ICR are \$6,350. 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 \$6,350. These are the record-keeping costs.

6(c) Estimating Agency Burden and Cost

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

The average annual Agency cost during the three years of the ICR is estimated to be \$13,800.

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 the Surface Coating of Large Appliances (40 CFR Part 63, Subpart NNNN).

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 10 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 10 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	10	0	0	10
2	0	10	0	0	10
3	0	10	0	0	10
Average	0	10	0	0	10

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

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 10.

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 performance test	0	1	0	0
Notification of compliance status	0	1	0	0
Initial performance test report and CMS evaluation	0	1	0	0
Periodic add-on control performance test report	0	1	0	0
Repeat performance test	0	0.05	0	0

Total Annual Responses				
Semiannual report	10	2	0	20
Total				20

The number of Total Annual Responses is 20.

The total annual labor costs are \$518,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for the Surface Coating of Large Appliances (40 CFR Part 63, Subpart NNNN).

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 4,380 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for the Surface Coating of Large Appliances (40 CFR Part 63, Subpart NNNN).

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 219 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$6,350. 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 276 labor hours at a cost of \$13,800; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for the Surface Coating of Large Appliances (40 CFR Part 63, Subpart NNNN).

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

6(f) Reasons for Change in Burden

There is an increase in burden from the most-recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This ICR incorporates the incremental burden from recent amendments to the rule as part of a Risk and Technology Review (RTR) in July 8, 2020 (85 FR 41100), previously approved by OMB (ICR No. 1954.09). The prior RTR amendments removed the excess emission and SSM reporting requirements, resulting in a small decrease in burden hours. The prior RTR amendments also adjusted an error in the previously-approved ICR and corrected the burden hours to record and disclose information to two hours per week, which is reflected in this ICR as an increase in burden. The growth rate for this industry is non-existent, with no new respondents expected. There is a slight increase in labor costs, which is wholly due to 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. The increase in labor rates has resulted in a small increase in O&M costs, as O&M costs are calculated using the labor rate for technical labor.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 219 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

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

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2021-0098. 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-2021-0098 and OMB Control Number 2060-0457 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 the Surface Coating of Large Appliances (40 CFR Part 63, Subpart NNNN).

Burden Item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person-Hours per occurrence	Number of occurrences per year	Person-Hours per respondent per year (C=A*B)	Respondents per year ^a	Technical person-hours per year (E=C*D)	Management person-hours per year (F=E*0.05)	Clerical person-hours per year (G=E*0.1)	Annual costs (\$) ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Initial performance testing (new sources) ^c								
A. Initial notification	2	1	2	0	0	0	0	\$0
B. Notification of performance test	2	1	2	0	0	0	0	\$0
C. Notification of compliance status	2	1	2	0	0	0	0	\$0
D. Initial performance test report and CPMS performance evaluation	2	1	2	0	0	0	0	\$0
4. Reporting requirements								
A. Familiarization with regulatory requirements ^d	4	1	4	10	40	2	4	\$5,441.14
B. Plan activities ^e	8	1	8	10	80	4	8	\$10,882.28
C. Training ^e	8	1	8	10	80	4	8	\$10,882.28
D. Gather information, monitor, and inspect ^f	12	12	144	10	1,440	72	144	\$195,881.04
E. Process/compile and review ^g	8	12	96	10	960	48	96	\$130,587.36
F. Periodic add-on control performance test report ^h	30	1	30	0	0	0	0	\$0
Repeat performance test ^h	30	0.05	1.5	0	0	0	0	\$0
G. Complete semiannual report ⁱ	8	2	16	10	160	8	16	\$21,764.56
Subtotal for Reporting Requirements						3,174		\$375,439
5. Recordkeeping requirements								
A. Familiarization with regulatory requirements	See 3A							

B. Plan activities	See 3B							
C. Implement activities	See 3B							
D. Develop record system								
i. Record/disclose ^j	2	52	104	10	1,040	52	104	\$141,469.64
ii. Store/file	0.25	2	0.5	10	5	0.25	0.5	\$680.14
E. Time to enter information								
F. Audits	N/A							
Subtotal for Recordkeeping Requirements					1,202			\$142,150
Total Labor Burden and Costs (rounded) ^k					4,380			\$518,000
Total Capital and O&M Cost (rounded): ^k								\$6,350
GRAND TOTAL (rounded): ^k								\$524,000

Assumptions:

- ^a We have assumed that there are 10 respondents subject to the rule, 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 that a new source will use an add-on control device to comply with the rule. Sources using an add-on control will use a CPMS to verify compliance with the rule. Because there are no new sources, no initial performance tests are expected to occur.
- ^d We have assumed that it will take 4 hours for existing respondents to refamiliarize themselves with rule requirements.
- ^e We have assumed that it will take eight hours for each respondent to plan activities and eight hours for training.
- ^f We have assumed that each respondent will take twelve hours twelve times per year to complete task.
- ^g We have assumed that each respondent will take eight hours twelve times per year to complete task.
- ^h Facilities that comply using emission capture systems and add-on controls conduct air emissions performance testing before March 15, 2022. Labor totals include hours for the facility to obtain the testing contractor, plan and attend the test, review the test report, and load it to ERT. We assume 5% of tests will fail and have to re-test. Permits indicate that nine of the ten facilities are using the compliant materials option or the emission rate without add-on controls option to demonstrate compliance and one facility using add-on controls is required to perform testing as part of their 40 CFR part 70 operating permit renewal. Therefore, the periodic testing requirement from the 2019 RTR amendment does not add any new testing burden.
- ⁱ We have assumed that each respondent will take eight hours twice per year to complete reports.
- ^j We have assumed that each respondent will take two hours each week to record and disclose information.
- ^k Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost - NESHAP for the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (Renewal)

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person-hours per activity	Number of occurrences per year	Person hours per respondent per year (C = A*B)	Respondents per year ^a	Technical person-hours per year (E=C*D)	Management person-hours per year (F=E*0.05)	Clerical person-hours per year (G=E*0.1)	Annual Costs (\$/yr) ^b
1. Initial add-on control performance test ^c	24	0	0	0	0	0	0	\$0
2. Repeat add-on control performance test ^c	24	0	0	0	0	0	0	\$0
3. Review notifications and reports - new sources ^d								
A. Initial notification	4	1	4	0	0	0	0	\$0
B. Notification of performance test	8	1	8	0	0	0	0	\$0
C. Notification of compliance status	8	1	8	0	0	0	0	\$0
D. Performance test report and CPMS evaluation	8	1	8	0	0	0	0	\$0
3. Periodic Testing ^e								
A. Review notification of performance test	4	1	4	0	0	0	0	\$0
B. Review add-on control performance test report	8	1	8	0	0	0	0	\$0
4. Semiannual report review ^f	12	2	24	10	240	12	24	\$13,789.20
TOTAL (rounded) ^g						276		\$13,800

Assumptions:

^a We have assumed that there are 10 respondents subject to the rule, with no additional new or reconstructed sources becoming subject to the rule over the next three years. Because there are no new sources, no initial performance tests are expected to occur.

^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 There are no new sources. Therefore, no initial performance tests are expected to occur.

^d Based on Agency experience, we assume that it will take four hours to review the initial notification, 8 hours to review the notification of the test, 8 hours to review the notification of compliance status, and 8 hours to review the performance test report and CPMS evaluation.

^e Based on Agency experience, we assume that it will take four hours to review the notification of the test and 8 hours to review the performance test report.

^f We have assumed that it will take the Agency 12 hours to review the semiannual report for each respondent.

^g Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.

**Appendix A – Draft Electronic Reporting Template
(see Docket ID Number EPA-HQ-OAR-2021-0098)**