

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal), EPA ICR Number 2034.10, OMB Control Number 2060-0510

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) were proposed on June 21, 2002; promulgated on May 28, 2003; and most-recently amended on March 4, 2019. The most-recent amendments to the regulations were the results of a residual risk and technology review (RTR) and included amendments to eliminate the startup, shutdown, and malfunction (SSM) exemption; remove the SSM plan requirement; add electronic submittal of notifications of compliance status, semiannual reports and performance test reports; and make technical and editorial changes. These regulations apply to existing facilities and new facilities that perform surface coating of wood building products 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, that use at least 4,170 liters (1,100 gallons) of coatings annually. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart QQQQ.

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's regional offices 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's regional offices. The use of the term "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 “Affected Public” are private sector businesses that perform surface coating of wood building products. The ‘burden’ to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for the Wood Building Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal). The ‘burden’ to the “Federal Government” is attributed entirely to work performed by either Federal employees or government contractors and refers below to Table 2: Average Annual EPA Burden and Cost – NESHAP for the Wood Building Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal). There are approximately 57 wood building products surface coating facilities, all which are owned and operated by the wood building products surface coating industry. None of these 57 facilities in the United States are owned by either state, local, or tribal entities or by 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 each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 57 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these 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 either 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, HAP emissions from wood building product 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 QQQQ.

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 these emission standards. Continuous emission monitors are used to ensure compliance with these same 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 these regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and 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), changes in information already provided required in 40 CFR 63.9(j), performance test reports, and semiannual reports through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For semiannual reports, EPA has developed a template for the reporting form in CEDRI specifically for 40 CFR Part 63, Subpart QQQQ. For the notifications required in 40 CFR 63.9(b) and 63.9(j), 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 QQQQ 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 QQQQ.

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 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* (87 FR 20847) on April 8, 2022. 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 57 respondents will be subject to these same standards over the three-year period covered by this ICR.

Industry trade association(s) 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 American Forest and Paper Association, at (202) 463-2700, and the American Wood Council, at (202) 463-2766.

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 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 wood building products surface coating facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, which corresponds to the North American Industry Classification System (NAICS) codes, are listed below.

Standard (40 CFR Part 60, Subpart QQQQ)	SIC Codes	NAICS Codes
Hardwood Veneer and Plywood Manufacturing	2435	321211
Softwood Veneer and Plywood Manufacturing	2436	321212
Engineered Wood Member (except Truss) Manufacturing	2439	321213
Truss Manufacturing	2439	321214
Reconstituted Wood Product Manufacturing	2493	321219
Wood Window and Door Manufacturing	2431	321911
Other Millwork (including Flooring)	2426, 2431	321918
All Other Miscellaneous Wood Product Manufacturing	2499	321999

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 Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ).

A source must make the following reports:

Notifications	
Initial notification	§63.4710(b), §63.5(d), 63.9(b)
Notification of compliance status	§63.4710(c), §63.9(h)
Notification of construction or reconstruction	§63.5
Notification of actual startup	§63.9(b)
Notification of performance test	§63.7(b), §63.8(e),

Notifications	
	§63.9(e)
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 (electronic submission)	§63.4720(a)
Excess emissions report	§§63.4720(a)(4-7)
Report of performance test	§63.4720(b)
Performance test reports (electronic submission)	§63.4720(d)

A source must keep the following records:

Recordkeeping	
Five-year retention of records	§63.4731(b), §63.10(b)
Material formulation data	§63.4730(b)
Records of HAP content calculations	§63.4730(c)
Copies of notifications and reports	§63.4730(a)
Records of names of materials used	§63.4730(d)
HAP fractions in each material used	§63.4730(e)
Coating solids fraction in each material used	§63.4730(f)
Density of materials used	§63.4730(g)
Documentation of waste material shipped offsite	§63.4730 (h)
Startup, shutdown, and malfunction plan records	§63.4730(k), §63.6(e)
Documentation of control device performance tests	§63.4730(k), §63.10(b)
Values measured by continuous monitoring systems	§63.4730(k)
Monitoring system calibrations, maintenance	§63.4730(k)
Periods of monitoring system failure shutdown	§§63.4730(j),(k)

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 4, 2019. 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 5900-594, 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 compliance monitoring system (CMS) for temperature, for gas flow, or for pressure drop for oxidizer, carbon adsorber, condenser, concentrator, or capture system.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, #A, 3B, 4, 24, 25, 25A, 204, 204A, 204B, 204C, 204D, 204E, 204F, 311, or ASTM Method D1475-98, D2697-86, D6093-97 test, and repeat performance tests if necessary.

Respondent Activities
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
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. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standards and note the operating conditions under which compliance was achieved. 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. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA 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, approximately 40% of the facilities in the category are small businesses (23 facilities), therefore, the impact on small entities 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. Based on a review of company sales, 21 of the parent companies affected by the final action were estimated to be small entities as defined by the Small Business Administration (parent companies may own more than one facility).

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 Wood Building Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (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 20,600 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulations, Agency knowledge and experience with the NSPS 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	\$157.61 (\$75.05 + 110%)
Technical	\$123.94 (\$59.02 + 110%)
Clerical	\$62.52 (\$29.77 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

(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 ^a	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M ^b	(G) Total O&M, (E X F)
CPMS	\$16,000	0	\$0	\$1,200	4	\$4,800

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
Method 24/25A performance test	\$14,000	0	\$0	\$0	0	0
Method 326/NCASI Method ISS/FP A105.01/Method 320 performance test	\$14,000	0	\$0	\$0	0	0
Method 204 performance test	\$8,000	0	\$0	\$0	0	0
Totals (Rounded)^c			\$0			\$4,800

^a We estimate no new respondents will become subject to the standard in the next three years.

^b We estimate 4 of the 57 respondents use add-on controls with a CPMS during the three-year period of this ICR.

^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 \$4,800. 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 \$4,800. 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 \$94,000.

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

Managerial	\$70.56 (GS-13, Step 5, \$44.10 + 60%)
Technical	\$52.37 (GS-12, Step 1, \$32.73 + 60%)
Clerical	\$28.34 (GS-6, Step 3, \$17.17 + 60%)

These rates are from the Office of Personnel Management (OPM), 2022 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 Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (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 57 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 57 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	€ 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	57	0	0
	2	0	57	0	0
	3	0	57	0	0
	Average	0	57	0	0

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 57.

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 compliance status	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test 1	0	1.2	0	0
Report of performance test	0	1.2	0	0
Semiannual report	57	2	0	114
Excess emissions report	57	0.5	0	29
			Total	143

The number of Total Annual Responses is 143.

The total annual labor costs are \$2,470,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (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 20,600. Details regarding these estimates may be found

in Table 1: Annual Respondent Burden and Cost – NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (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 144 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$68,400. 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 1,840 labor hours at a cost of \$94,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (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

The increase in burden from the most-recently approved ICR is not due to any program changes. The increase is due to an adjustment(s). The change in the burden and cost estimates occurred because the most-recent amendments to these standards have been in effect for more than three years and the requirements are different during initial compliance as compared to on-going compliance. The previous ICR reflected those burdens and costs associated with the initial activities for subject facilities, including initial performance tests and associated notifications. This ICR, by in large, reflects the on-going burden and costs for existing facilities. This ICR also updates the labor burden for facilities to familiarize themselves with the rule and process and review information each year, and includes burden for preparation and submittal of excess emissions reports with the semiannual report. The capital/startup vs. operation and maintenance (O&M) costs have decreased due to a more accurate estimate of the number of sources using add-on controls with CPMS.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 144 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-2022-0031. 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-2022-0031 and OMB Control Number 2060-0510 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 Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (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) Management person-hrs. per year (F=E \times 0.05)	(G) Clerical person- hrs. per year (G=E \times 0.1)	(H) Annual costs (\$) ^b
1. Reporting requirements								
a. Familiarize with rule requirements	4	1	4	57	228	11.4	22.8	\$31,480.53
b. Process/review information	4	4	16	57	912	45.6	91.2	\$125,922.12
c. Prepare for initial test performance test	24	1	24	0	0	0	0	\$0
d. Write reports								
i. Initial notification	2	1	2	0	0	0	0	\$0
ii. Notification of compliance status ^d	10	1	10	0	0	0	0	\$0
iii. Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0.00
iv. Notification of actual startup	2	1	2	0	0	0	0	\$0.00
v. Notification of performance test	2	1	2	0	0	0	0	\$0.00
vi. Report of performance test (through ERT) ^e	10	1	10	0	0	0	0	\$0.00
vii. Semiannual report	8	2	16	57	912	45.6	91.2	\$125,922.12
viii. Excess emissions report	4	0.5	2	57	114	5.7	11.4	\$15,740.27

<i>Subtotal for Reporting Requirements</i>						2,491		\$299,065
2. Recordkeeping requirements								
a. Familiarize with rule requirements	See 1A							
b. Plan activities	12	1	12	57	684	34.2	68.4	\$94,441.59
c. Implement activities	12	1	12	57	684	34.2	68.4	\$94,441.59
d. Maintain record system for material used	20	1	20	57	1,140	57	114	\$157,402.65
e. Time to enter information								
i. Material purchase records ^c	4	1	4	23	92	4.6	9.2	\$12,702.67
ii. Material usage records ^c	16	12	192	34	6,528	326.4	652.8	\$901,337.28
iii. Compliance calculations ^c	8	12	96	34	3,264	163.2	326.4	\$450,668.64
f. Time to train personnel ^f	10	1	10	57	570	28.5	57	\$78,701.33
g. Store, file, and maintain records	4	12	48	57	2,736	136.8	273.6	\$377,766.36
h. Retrieve records/reports	2	12	24	57	57	2.85	5.7	\$7,870.13
<i>Subtotal for Recordkeeping Requirements</i>						18,118		\$2,175,332
TOTAL LABOR BURDEN AND COST (rounded) ^g						20,600		\$2,470,000
Capital and O&M Cost ^g								\$4,800
Grand TOTAL ^g								\$2,470,000

Assumptions:

^a There is an average of 57 respondents per year over the next three years of this ICR. In addition, we have assumed that no new facilities will become subject to this regulation.

^b This ICR uses the following labor rates: \$157.61 per hour for Executive, Administrative, and Managerial labor; \$123.94 per hour for Technical labor, and \$62.52 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

^c We estimate that 40% of facilities are using the compliant material option to comply with the rule; therefore 40% of the 57 facilities (23 respondents) have to provide material purchase records and 60% of the 57 facilities (34 respondents) are tracking material usage and doing monthly compliance calculations.

^d We estimate that it will take the respondent 10 hours to prepare the notification of compliance status.

^e We estimate that it will take the respondent 10 hours to prepare and submit an initial performance test report.

^f We estimate that it will take the respondent 10 hours once per year for initial training of personnel.

^g 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 the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal)

Burden Item	(A) EPA Person-hours per activity	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (D=Cx0.05)	(G) Clerical person-hours per year (E=Cx0.1)	(H) Annual costs (\$) ^b
1. Initial performance test	24	0	0	0	0	0	0	\$0
2. Repeat performance test	24	0	0	0	0	0	0	\$0
3. Report review								
a) Initial notification	8	0	0	0	0	0	0	\$0
b) Notification of performance test	8	0	0	0	0	0	0	\$0
c) Notification of compliance status	8	0	0	0	0	0	0	\$0
d) Notification of construction/reconstruction	8	0	0	0	0	0	0	\$0
e) Notification of actual startup	8	0	0	0	0	0	0	\$0
f) Notification of performance test	8	0	0	0	0	0	0	\$0
g) Report of performance test	8	0	0	0	0	0	0	\$0
h) Semiannual report	12	2	24	57	1,368	68.4	136.8	\$80,345
i) Excess emissions report	8	0.5	4	57	228	11.4	22.8	\$13,391
Total Burden Hours and Costs ^c						1,840		\$94,000

Assumptions:

^a There is an average of 57 respondents per year over the next three years of this ICR. In addition, we have assumed that no new facility will become subject to this regulation.

^b This cost is based on the following labor rates: Managerial rate of \$70.56 (GS-13, Step 5, \$44.10 + 60%), Technical rate of \$52.37 (GS-12, Step 1, \$32.73 +

60%), and Clerical rate of \$28.34 (GS-6, Step 3, \$17.17 + 60%). These rates are from the Office of Personnel Management (OPM), 2022 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.
° 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-2022-0031)**