SUPPORTING STATEMENT ENVIRONMENTAL PROTECTION AGENCY

NSPS Review for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60, Subparts TTT and TTTa) (Amendments)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS Review for Surface Coating of Plastic Parts for Business Machines (40 CFR part 60, subparts TTT and TTTa), EPA ICR Number 1093.14, OMB Control Number 2060-0162.

1(b) Short Characterization/Abstract

The current New Source Performance Standards (NSPS) for the regulations published at 40 CFR part 60, subpart TTT, were proposed on January 8, 1986, and promulgated on January 29, 1988. These regulations apply to sources (plant sites) whose NSPS "affected facilities" perform industrial surface coating on plastic parts for use in the manufacture of business machines. Each affected facility is a spray booth that applies prime coats, color coats, texture coats, or touch-up coats. The affected facilities subject to NSPS subpart TTT are those that commenced construction, reconstruction, or modification after the date of proposal (January 8, 1986). The EPA is proposing to amend 40 CFR part 60 by establishing a new subpart TTTa, to apply only to affected facilities that commence construction, reconstruction, or modification after the date of publication of the upcoming proposal in the Federal Register. As part of this same rulemaking, the EPA is also proposing amendments to 40 CFR part 60, subpart TTT, such as to newly require electronic submission of the affected facilities' periodic reports, and the amendments will limit applicability of subpart TTT to affected facilities that commenced construction, reconstruction, or modification after January 8, 1986, but on or before the date of publication of the upcoming proposal in the Federal Register. This information is being collected to assure compliance with 40 CFR part 60, subpart TTT and new subpart TTTa.

In general, all NSPS 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 NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and shall retain the file for at least 2 years following the generation date of such 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 appropriate EPA regional office. 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 owners or operators of facilities that perform industrial surface coating on plastic parts for use in the manufacture of business machines. The burden to the "Affected Public" may be found in Tables 1 through 4 of Attachment 1. The burden to the "Federal government" is attributed entirely to work performed by federal employees or government contractors and may be found in Tables 5 through 8 of Attachment 1. There are approximately three plant sites with spray booths used to surface coat plastic parts for business machines. None of the three sites in the United States are owned by state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond.

Based on our consultations with respondents, there are an average of eight affected facilities (spray booths) at each plant site, and each plant site has only one respondent (*i.e.*, the owner/operator of the plant site).

Respondents are sources that are owned and operated by entities that perform surface coating of plastic parts for business machines and that will be subject to either subpart TTT or subpart TTTa of the NSPS. Over the next 3 years, the EPA estimates that approximately three respondents subject to subpart TTT will be affected by the amendments being proposed. The EPA estimates minimal burden on respondents and no change in burden on the EPA as a result of amendments affecting sources subject to subpart TTT, because the amendments are minor, primarily to incorporate requirements for electronic submission of reports. The EPA estimates no burden on respondents or on the EPA associated with the proposed amendments under subpart TTTa, for the reason that no new, modified, or reconstructed facilities are expected over the 3-year collection period for which OMB's clearance is requested.

Over the next 3 years, we estimate that three respondents per year will be subject to these standards, and the total labor, capital, and operations and maintenance costs imposed by the amendments will average to approximately \$276 per year for the first 3 years after the amendments are finalized. All of the incremental costs would be incurred in the first year, when existing sources familiarize with the proposed amendments (an estimated \$828). The proposed amendments would not impose any additional burden on respondents in years two and three. The burden to the respondents from each facility is shown in Tables 1 through 4 of Attachment 1, which is available as an Excel workbook in the docket for this action (Docket ID No. EPA-HQ-OAR-2021-0200).

The total cost to the Designated Administrator during the 3 years of the ICR is estimated to average to \$0 per year as a result of the subject rule amendments, with equal cost in the first year (an estimated \$0). This burden includes labor costs for the EPA and state and local

authorities to implement the requirements in the NSPS resulting from the subject rule amendments. This burden is shown in Tables 5 through 8 of Attachment 1.

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

CAA section 111(b)(1)(B) requires the EPA to "at least every 8 years review and, if appropriate, revise" new source performance standards. In setting or revising a performance standard, CAA section 111(a)(1) provides that performance standards are to "reflect the degree of emission limitation achievable through the application of the best system of emission reduction which (taking into account the cost of achieving such reduction and any nonair quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated." We refer to this level of control as the best system of emission reduction or "BSER."

The CAA makes clear that the EPA is to determine both the BSER for the regulated sources in the source category and the degree of emission limitation achievable through application of the BSER. The EPA must then, under CAA section 111(b)(1)(B), promulgate standards of performance for new sources that reflect that level of stringency. CAA section 111(b)(5) precludes the EPA from prescribing a particular technological system that must be used to comply with a standard of performance. Rather, sources can select any measure or combination of measures that will achieve the standard.

In addition, CAA section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

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

In the Administrator's judgment, volatile organic compound (VOC) emissions from surface coating of plastic parts either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart TTT.

The amendments being proposed present the EPA's review of the requirements of 40 CFR part 60, subpart TTT pursuant to CAA 111(b)(1)(B). Based on this statutory review, the EPA is determining that there are emission reduction techniques used in practice that achieve greater VOC emission reductions than those currently required by NSPS subpart TTT for surface coating operations. Pursuant to CAA Section 111(a), the VOC emission standards proposed under the new NSPS subpart TTTa would apply only to facilities that begin construction, reconstruction, or modification after the date of publication of the upcoming proposal in the <u>Federal Register</u>.

For sources that are currently subject to the NSPS, we are proposing certain revisions to subpart TTT that would not change the applicability of the NSPS or existing emission limits for VOC. The proposed revisions would apply to all affected facilities that commence construction, reconstruction, or modification after January 8, 1986 (*i.e.*, all affected facilities under both subpart TTT and proposed subpart TTTa). With respect to affected facilities subject to subpart TTT, none of these clarifications would increase the cost of the rule or result in a change in VOC emissions.

2(b) Practical Utility/Users of the Data

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

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

The notifications required in the standards are used to inform the Agency or Designated Administrator when a source becomes subject to the requirements of the regulations. The Designated Administrator may also use information to inform an inspection of the source to check whether the pollution controls are properly implemented and to check whether the standards are being met.

The required quarterly and semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and demonstrate ongoing compliance with standards.

Additionally, the EPA is proposing that owners or operators of affected sources would submit electronic copies of required performance test reports, quarterly reports of noncompliance, and semiannual statements of compliance through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). A description of the electronic data submission process is provided in the memorandum *Electronic Reporting Requirements for New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) Rules*, available in the docket for the rulemaking action. The proposed rule requires that the performance test reports, quarterly reports of noncompliance, and semiannual statements of compliance be submitted as a portable document format (PDF) upload in CEDRI. The proposed requirements would apply to all affected facilities that commence construction, modification or reconstruction after January 8, 1986 (*i.e.*, all affected facilities under both subpart TTT and proposed subpart TTTa).

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

The requested changes in recordkeeping and reporting will be required under 40 CFR part 60, subpart TTT, and new recordkeeping and reporting will be required under 40 CFR part 60, subpart TTTa.

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 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 this ICR will be published in the <u>Federal Register</u>. Any comments that are submitted on the estimated burden will be published in the <u>Federal Register</u>.

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 3 years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities.

Industry trade associations and other interested parties were provided with an opportunity to comment on the burden associated with the standard when it was being developed, and the standards have been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we consulted with internal experts at EPA's Office of Air Quality and Planning Standards (OAQPS) and the American Coatings Association.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first <u>Federal Register</u> notice.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and that 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.

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 and recordkeeping requirements in the standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements are facilities that perform surface coating of plastic parts for business machines. These surface coating operations may be (but are not necessarily) among establishments indexed under the 2022 North American Industry Classification System (NAICS) code 333310, for "Commercial and Service Industry Machinery Manufacturing." This NAICS code merely provides a guide for readers regarding the entities that the proposed rulemaking is likely to affect.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported are required by the NSPS Review for Surface Coating of Plastic Parts for Business Machines (40 CFR part 60, subparts TTT and TTTa) (Amendments).

A source must make the following reports:

Notifications			
Notification of construction/reconstruction	§60.7(a)(1)		
Notification of actual startup	§60.7(a)(3)		
Initial performance test results	§§60.8(a), 60.724(a)		
Initial performance test	§60.8(d)		
Notification of physical or operational change	§60.7(a)(4)		

Reports		
Statement of compliance (semiannual)	§60.724(b)(2) and §60.724a(b)(2)	
Excess emissions/noncompliance (quarterly)	§60.724(b)(1) and §60.724a(b)(1)	

A source must keep the following records:

Recordkeeping			
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	§60.7(b)		
Monthly performance test measures and calculations	§60.724(a) and §60.724a(a)		
Records are required to be retained for 2 years. These records must be kept onsite.	§60.724(d) and §60.724a(d)		

Electronic Submission of Reports

As part of the proposed amendments, respondents are required to submit notifications and semiannual reports through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI). The notification is an upload of their currently required notification in portable document format (PDF) file. No electronic template is necessary for the reporting required by the

subject rulemaking. For purposes of this ICR, it is assumed that there will be only minimal 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 for this rule, see: <u>https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert</u>.

(ii) Respondent Activities

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 the purpose of 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.
Familiarization with the CDX and CEDRI systems.

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

5(a) Agency Activities

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

Agency Activities

Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.

Audit facility records.

Agency Activities

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 standard 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 and quarterly reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

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

The records required by this regulation must be retained by the owner/operator for 2 years.

5(c) Small Entity Flexibility

The majority of the respondents are small entities (*i.e.*, small businesses). However, 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 emission reduction technique 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.

The number of small entities potentially subject to the requirements of this information collection request is estimated to be 67 percent of the respondent universe, or two plants from a total of three respondents. This estimate is based on the percent of plants in this industry that were classified as small plants during the development of this rule.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Tables 1 through 3 of Attachment 1, which is available as an Excel workbook in the docket for this action (Docket ID No. EPA- HQ-OAR-2021-0200).

6. Estimating the Burden and Cost of the Collection

Tables 1 through 4 of Attachment 1 present an itemization and summary of the burden on the respondents to result from the subject amendments for the recordkeeping and reporting requirements in the first 3 years following promulgation of the amendments to the NSPS for Surface Coating of Plastic Parts for Business Machines. Tables 5 through 8 of Attachment 1 present an itemization and summary of the burden on the EPA and state and local authorities in the first 3 years following promulgation of the amendments to the NSPS for Surface Coating of Plastic Parts for Business Machines.

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.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The total burden to industry over the next 3 years from the proposed recordkeeping and reporting requirements is estimated to be 7 hours, with an average annual burden of 2 hours. The average annual reporting hours are estimated at 0 hours and the average annual recordkeeping hours are estimated at 2 hours, as shown in Table 4 of Attachment 1. These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

The information collection activities for sources subject to these requirements are presented in Tables 1 through 4 of Attachment 1. The total cost for each respondent activity includes non-labor costs, capital/startup costs, and operation and maintenance (O&M) costs.

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$157.61 (\$75.05 + 110%)
Technical	\$123.95 (\$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 proposed standards are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance costs.

6(c) Estimating Agency Burden and Cost

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

The average annual Agency cost during the 3 years of the ICR attributable to the subject proposed amendments to the NSPS for Surface Coating of Plastic Parts for Business Machines is estimated to be \$828. 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 government employees. Details upon which this estimate is based are shown in Tables 5 through 8 of Attachment 1.

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

The total number of respondents is also referred to as the respondent universe. Based on research conducted for the subject amendments to the NSPS for Surface Coating of Plastic Parts for Business Machines, three facilities are currently operating and subject to the standards. It is estimated that no additional respondents will become subject over the 3 years after promulgation of the subject amendments. It is assumed that all of the existing facilities will begin complying upon promulgation of the subject amendments and will be subject to recordkeeping and reporting requirements in each of the 3 years covered by this ICR.

The number of respondents is calculated using the following table that addresses the 3 years covered by this ICR:

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

¹New 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 3-year period of this ICR is three.

The total number of annual responses per year is calculated using the following table: [The information used in this section is from Table 1 of Attachment 1.]

Total Annual Responses, In Year One						
(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		
Become familiar with CEDRI for electronic filing of notifications and reports ^a	3	1	0	3		
			Total	3		
	Total Annual Responses, In Year Two					
Become familiar with CEDRI for electronic filing of notifications and reports ^a	0	0	0	0		
			Total	0		
Total Annual Responses, In Year Three						
Become familiar with CEDRI for electronic filing of notifications and reports ^a	0	0	0	0		
			Total	0		

The number of Total Annual Responses in year one is three. The number of Total Annual Responses in years two and three is zero.

The total annual labor costs associated with the proposed amendments are \$828, which are the estimated costs of familiarizing with the rule revisions and the associated electronic reporting system in year one. Details regarding these estimates may be found in Tables 1 through 4 of Attachment 1.

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 Attachment 1, which is available as an Excel workbook in the docket for this action (Docket ID No. EPA-HQ-OAR-2021-0200), and they are summarized below.

(i) Respondent Tally

The total annual labor hours associated with the proposed amendments are 2 hours. Details regarding these estimates may be found in Tables 1 through 4 of Attachment 1.

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

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 2 hours per response.

The total annual capital/startup and operation and maintenance (O&M) costs associated with the proposed rulemaking's requirements for electronic submission of reports are \$0. The cost calculations are detailed in Section 6(b)(iii), Estimated Capital/Startup and Operation and Maintenance Costs.

(iii) The Agency Tally

The average annual Agency (Designated Administrator) burden and cost associated with the proposed amendments over the next 3 years is estimated to be 0 labor hours at a cost of \$0, as shown in Tables 5 through 8 of Attachment 1.

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

6(f) Reasons for Change in Burden

In this ICR, the EPA estimates additional one-time respondent burden of 2 labor hours in the first year following promulgation of the proposed amendments to provide for becoming

familiar with the amendments to NSPS subpart TTT and becoming familiar with the CDX and CEDRI systems associated with electronic submission of reports. These amendments will not impact the burden on respondents in later years because they do not impose additional reporting or recordkeeping requirements. The total estimated respondent burden as currently identified in the OMB Inventory of Approved Burdens is based on 10 respondents (a larger number than the three respondents counted in this ICR). The downward adjustment in the number of respondents for this ICR, based on the EPA's most recent information, is reflected in Attachment 1 to this ICR Supporting Statement.

The only other change is related to the use of updated labor rates. This ICR uses labor rates from the most recent Bureau of Labor Statistics report (September 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 2 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 not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2021-0200. 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 EPA Docket Center, Room 3334, WJC West Building, 1301 Constitution Avenue, NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Public Reading Room is (202) 566-1744, and the telephone number for the EPA Docket Center is (202) 566-1742. 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-2021-0200 and OMB Control Number 2060-0162 in any correspondence.

Part B of the Supporting Statement

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

Attachment 1:

Information Collection Request (ICR) Workbook for

NSPS Review for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60, Subparts TTT and TTTa) (Amendments).

Excel workbook: Business Machines NSPS proposal_ICR Workbook_1093.14.xlsx.