

ICR Summary Information

Hours per Response	79
Number of Respondents	77
Total Estimated Burden Hours	16,900
Total Estimated Costs	\$3,330,000
Annualized Capital O&M	\$1,200,000
Total Annual Responses	214
Form Number	Not Applicable

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

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a
1. Applications	N/A			
2. Surveys and studies	N/A			
3. Reporting requirements				
A. Familiarize with the regulatory requirements ^c	1	1	1	77
B. Required activities				
Initial performance test	280	1	280	5
Repeat performance test ^d	280	1	280	1
Monthly compliance test ^e	90	12	1080	1
C. Create information	See 3B			
D. Gather existing information	See 3E			
E. Write report				
Notification of construction/ reconstruction	2	1	2	5
Notification of actual startup	2	1	2	5
Notification of initial performance test	2	1	2	5
Notification of VOC use at end of initial year ^f	2	1	2	1
Report of performance test	See 3B			
Report of monitoring exceedances and non-compliance periods ^g	16	4	64	15
Report of no excess emissions ^h	8	2	16	62
Report when 1st projected VOC use exceeds cutoff	2	1	2	2
Report when 1st actual 12-month VOC use exceeds cutoff ⁱ	2	1	2	0
Notification of changes ^j	4	1	4	5
Subtotal for Reporting Requirements				
4. Recordkeeping requirements				
A. Read instructions	See 3A			
B. Plan activities	See 3B			
C. Implement activities	See 3B			
D. Develop record system	N/A			
E. Time to enter information				
Records of startups, shutdowns, malfunctions, etc. ^k	1.5	25	37.5	77
Records of operating parameters ^l	0.25	350	87.5	77
Records of semiannual projected VOC use estimate ^m	1	2	2	15
Records of 12-month actual VOC use ^m	1	12	12	15
F. Train personnel	N/A			
G. Audits	N/A			
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Costs (rounded) ⁿ				
Total Capital and O&M Cost (rounded) ⁿ				
GRAND TOTAL (rounded) ⁿ				

Assumptions:

- ^a On average, EPA estimates 76 existing plants and one new plant per year will be subject to the NSPS over the next 3 years coating lines.
- ^b This ICR uses the following labor rates: Managerial \$163.17 (\$77.70 + 110%); Technical \$130.28 (\$62.04 + 110%); and Civilian \$100.00 (\$47.62 + 110%). Source: United States Department of Labor, Bureau of Labor Statistics, September 2022, "Table 2. Civilian Workers, by occupation and compensation." The rates have been increased by 110 percent to account for varying industry wage rates and the additional costs of wages and benefits, including business expenses associated with hiring, training, and equipping their employees.
- ^c This ICR assumes it will take each facility 1 hour per year to familiarize with regulatory requirements.
- ^d This ICR assumes 20 percent of initial performance tests must be repeated due to failure ($5 \times 20\% = 1$).
- ^e This ICR assumes one coating line per year will demonstrate compliance by the liquid material balance method, which requires a 10 percent margin of error.
- ^f This ICR assumes one plant per year will be required to submit this notification.
- ^g This ICR assumes 20 percent of existing and new plants will report monitoring exceedances or non-compliance periods on a regular basis. Plants that do not report will comply through either the emission reduction, alternative, or coating mix preparation equipment standards.
- ^h This ICR assumes 80 percent of existing and new plants will report no excess emissions ($77 \times 80\% = 62$, after rounding).
- ⁱ This ICR assumes no coating lines at any existing or new plants will exceed the cutoff value.
- ^j This burden applies to new plants and existing plants that modify or reconstruct coating operations or coating mix preparation equipment per year and 4 existing plants with new coating lines per year.
- ^k This ICR assumes there will be one malfunction or shutdown every 2 weeks over 50 weeks per year, or 25 occurrences per year.
- ^l This ICR assumes operating parameters will be recorded over 350 days per year.
- ^m This assumes 20 percent of existing and new plants will record VOC use estimates ($77 \times 20\% = 15$, after rounding).
- ⁿ Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

trates Facilities (40 CFR Part 60, Subpart VVV) (Renewal)

(E) Technical person hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
77	3.85	7.7	\$11,165.73
1400	70	140	\$203,013.30
280	14	28	\$40,602.66
1080	54	108	\$156,610.26
10	0.5	1	\$1,450.10
10	0.5	1	\$1,450.10
10	0.5	1	\$1,450.10
2	0.1	0.2	\$290.02
960	48	96	\$139,209.12
992	49.6	99.2	\$143,849.42
4	0.2	0.4	\$580.04
0	0	0	\$0
20	1	2	\$2,900.19
5,572			\$702,571
2887.5	144.375	288.75	\$418,714.93
6,737.50	336.875	673.75	\$977,001.51
30	1.5	3	\$4,350.29
180	9	18	\$26,101.71
11,310			\$1,426,168
16,900			\$2,130,000
			\$1,200,000
			\$3,330,000

Labor Rates	
Management	\$163.17
Technical	\$130.28
Clerical	\$65.71

79 hr/respons

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

merical \$65.71 (\$31.29 + 110%). These rates are from the
l and industry group.” The rates are from column 1, “Total
verhead business costs of employing workers beyond their

uires monthly compliance testing.

a quarterly basis ($77 \times 20\% = 15$, after rounding). These plants

ion equipment. Per footnote a, EPA estimates one new plant

year ($50/2 = 25$).

Table 2: Annual Respondent Burden and Cost – NSPS for Polymeric Coating of Supporting

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a
New facilities				
Notification of construction/ reconstruction	2	1	2	5
Notification of actual startup	2	1	2	5
Notification of initial performance test	2	1	2	5
Notification of VOC use at end of initial year	2	1	2	1
Performance test results	8	1	8	5
New and existing facilities				
Report of monitoring exceedances and non-compliance periods ^c	8	4	32	15
Report of no excess emissions ^d	2	2	4	62
Report when 1st projected VOC use exceeds cutoff	2	1	2	2
Report when 1st actual 12-month VOC use exceeds cutoff ^e	2	1	2	0
Notification of changes ^f	2	1	2	5
TOTAL (rounded) ^g				

Assumptions:

^a On average, EPA estimates 76 existing plants and one new plant per year will be subject to the NSPS over the 3-year period. The 77 plants will install new coating lines.

^b This ICR uses the following labor rates: Managerial, \$73.46 (GS-13, Step 5, \$45.91 + 60%); Technical, \$54.51 (GS-11, Step 5, \$33.44 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes 10 percent to account for the benefit packages available to government employees.

^c This ICR assumes 20 percent of existing and new plants will report monitoring exceedances or non-compliance per year. The remaining 80 percent of plants will comply through either the emission reduction, alternative, or coating mix preparation equipment standards.

^d This ICR assumes 80 percent of existing and new plants will report no excess emissions ($77 \times 80\% = 62$, after round).

^e This ICR assumes no coating lines at any existing or new plants will exceed the cutoff value.

^f This burden applies to new plants and existing plants that modify or reconstruct coating operations or coating mix preparation equipment at 1 plant per year and 4 existing plants with new coating lines per year.

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

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

(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
10	0.5	1	\$611.33
10	0.5	1	\$611.33
10	0.5	1	\$611.33
2	0.1	0.2	\$122.27
40	2	4	\$2,445.32
492.8	24.64	49.28	\$30,126.34
246.4	12.32	24.64	\$15,063.17
4	0.2	0.4	\$244.53
0	0.0	0	\$0
10	0.5	1	\$611.33
950			\$50,400

Labor Rates	
Management	\$73.46
Technical	\$54.51
Clerical	\$29.50

ar period of this ICR. This ICR assumes 4 existing plants per

3-12, Step 1, \$34.07 + 60%); and Clerical \$29.50 (GS-6, Step 3, includes locality rates of pay. The rates have been increased by 60

iods on a quarterly basis (77×20% = 15, after rounding). These

ling).

reparation equipment. Per footnote a, EPA estimates one new

Capital/Startup vs. Operation and Maintenance (O&M) Costs					
(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M
VOC Monitor	\$56,726	1	\$56,726	\$12,054	76
Temperature Monitor	\$12,054	1	\$12,054	\$2,836	76
Totals (rounded) ^a			\$68,800		

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

^b Costs have been increased from 2008 to 2022 \$ using the CEPCI Equipment Cost Index.

(G)
Total O&M, (E X F)
\$916,121
\$215,558
\$1,130,000

2008 CEPCI	2022 CEPCI
575.4	816

\$1,200,000

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(B \times C)+D$
Notification of construction/reconstruction	5	1	0	5
Notification of actual startup	5	1	0	5
Notification of initial performance test	5	1	0	5
Notification of VOC use at end of initial year	1	1	0	1
Report of performance test	5	1	0	5
Report of repeat performance test	1	1	0	1
Report of monitoring exceedances and non-compliance periods	15.4	4	0	61.6
Report of no excess emissions	61.6	2	0	123.2
Report when 1st projected VOC use exceeds cutoff	2	1	0	2
Report when 1st actual 12-month VOC use exceeds cutoff	0	1	0	0
Notification of changes	5	1	0	5
			Total	214

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ^a	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents
1	5	75	0	4
2	5	76	0	4
3	5	77	0	4
Average	5	76	0	4

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

(E)
Number of Respondents (E=A+B+C-D)
76
77
78
77