

U.S. Environmental Protection Agency

Information Collection Request

TITLE: NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV)
(Renewal)

OMB CONTROL NUMBER: 2060-0181

EPA ICR NUMBER: 1284.13

ABSTRACT:

The New Source Performance Standards (NSPS) for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) were proposed on April 30, 1987, and promulgated on September 11, 1989. These regulations apply to each existing and new coating operation and any on-site coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates. 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 60, Subpart VVV.

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 of these measurements, and retain the file for at least two 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 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 facilities engaged in the manufacture of polymeric coating of supporting substrates. The "burden" to the "Affected Public" may be found in Table 1: Annual Respondent Burden and Cost - NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal). The "burden" to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found in Table 2: Average Annual EPA Burden and Cost - NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal). There are approximately 77 polymeric coating of supporting substrates facilities. None of the facilities 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 industry representatives, there is an average of one affected facilities 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 77 respondents per year will be subject to the standard, and one additional respondent per year will become subject to the standard.

The active (previous) ICR had the following Terms of Clearance (TOC):

“Upon renewal of this collection, OMB requests that EPA submit the following as supplemental documents: the regulatory text that includes the ICR; the regulatory text that includes the submission instructions; and any screen shots of the electronic portal where the reporting requirements are submitted online to EPA. Please discuss in more detail how each piece of information is submitted, either electronically or in hard copy, and what information is permitted to be submitted in electronic format. Please include the OMB burden statement on the electronic portal. Finally, please also update to the standard 18 question SS-A format upon renewal.”

The relevant regulatory text is referenced in section 12b of this document. We have created supplementary documents including the regulatory text that describes the ICR requirements as requested. This NSPS does not require electronic reporting, and the Agency has not developed specific reporting forms for this subpart for use within CEDRI. The list of rules and required reports available in CEDRI are available at <https://www.epa.gov/electronic-reporting-air-emissions/cedri>. The notifications and reports required of respondents may be submitted to the authority by any appropriate method such as paper letter or electronic data file.

Supporting Statement A

1. NEED AND AUTHORITY FOR THE COLLECTION:

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(l).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years. 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, volatile organic compound (VOC) emissions from polymeric coating of supporting substrates facilities 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 VVV.

2. PRACTICAL UTILITY/USERS OF THE DATA:

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

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

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with the 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 the 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 quarterly and semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

3. USE OF TECHNOLOGY:

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for

adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

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.

Information reported by state and local governments is transmitted to 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. The EPA and its delegated authorities can edit, store, retrieve and analyze the data.

4. EFFORTS TO IDENTIFY DUPLICATION:

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

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.

5. MINIMIZING BURDEN ON SMALL ENTITIES:

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

There is a distribution of small and large business affected by these standards. The impact on small entities (i.e., small businesses) was taken into consideration during the development of these regulations. Any affected facility that uses less than 95 Mg VOC per 12-month period is subject only to the requirements of Sections 60.744(b), 60.747(b) and 60.747(c) of these standards, which require reports and records of VOC use. This reduces regulatory requirements for smaller facilities.

According to EPA's *Polymeric Coating of Supporting Substrates - Background Information for Proposed Standards* (May 1985), approximately 55 percent of plants applying polymeric coatings to supporting substrates are small businesses according to employment-size criteria established by the U.S. Small Business Administration. Applying this percentage to the estimated number of respondents affected by this rule, approximately 41 respondents are small 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.

6. EFFECTS OF LESS FREQUENT COLLECTION:

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

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 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.

7. GENERAL GUIDELINES:

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with PRA Guidelines at 5 CFR 1320.5(d)(2).

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

8. PUBLIC COMMENT AND CONSULTATIONS:

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (88 FR 31748) on May 18, 2023. No comments were received on the burden published in the Federal Register for this renewal.

8b. Consultations

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

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 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. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 74 respondents will be subject to the standard 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 the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both Morbern at 613-932-8811 and Solvay at (713) 525-6000.

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 *Federal Register* notice. In this case, no comments were received.

9. PAYMENTS OR GIFTS TO RESPONDENTS:

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

The Agency does not intend to provide payments or gifts to respondents as part of this collection.

10. PROVISIONS FOR PROTECTION OF INFORMATION:

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

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).

11. JUSTIFICATION FOR SENSITIVE QUESTIONS:

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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

12. RESPONDENT BURDEN HOURS AND LABOR COSTS:

Provide estimates of the hour burden of the collection of information. The statement should:

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.*

- If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.

12a. RESPONDENTS/NAICS CODES

The respondents to the recordkeeping and reporting requirements are owners/operators of polymeric coating of supporting substrates facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected and the corresponding North American Industry Classification System (NAICS) are listed in the table below:

Standard (40 CFR Part 60, Subpart VVV)	SIC Codes	NAICS Codes
Narrow Fabric Mills and Schiffli Machine Embroidery	2241	313220
Fabric Coating Mills	2295, 3069	313320
Rope, Cordage, Twine, Tire Cord, and Tire Fabric Mills	2296	314994
Textile Bag and Canvas Mills	2394, 3069	314910
Other Cut and Sew Apparel Manufacturing	3069	315280
Apparel Accessories and Other Apparel Manufacturing	3069	315990
All Other Plastics Product Manufacturing	3069	326199
Rubber and Plastics Hoses and Belting Manufacturing	3052	326220
All Other Rubber Product Manufacturing	3069	326299
Surgical Appliance and Supplies Manufacturing	3069	339113
Sporting and Athletic Goods Manufacturing	3069	339920
Doll, Toy, and Game Manufacturing	3069	339930
Gaskets, Packing, and Sealing Device Manufacturing	3053	339991

Based on our research for this ICR, on average over the next three years, approximately 77 existing respondents will be subject to these standards. It is estimated that one additional respondent per year will become subject to these same standards. The EPA also assumes that 4 existing plants per year will install new coating lines and be subject to initial startup and performance testing requirements. The overall average number of respondents, as shown in the table below, is 77 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	5	75	0	4	76
2	5	76	0	4	77
3	5	77	0	4	78
Average	5	76	0	4	77

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 77.

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
Notification of construction/reconstruction	5	1	0	5
Notification of actual startup	5	1	0	5

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 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	0	62
Report of no excess emissions	62	2	0	123
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

The number of Total Annual Responses is 214. Note that 4 respondents have been double counted in the above table because they have both existing affected facilities and new affected facilities.

12b. INFORMATION REQUESTED

In this ICR, all the data that are recorded or reported is required by the NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV).

A source must make the following reports:

Notifications	
Construction/reconstruction	§60.7(a)(1)
Actual startup	§60.7(a)(3)
Physical or operational change	§60.7(a)(4)
Demonstration of continuous monitoring system performance	§60.7(a)(5)
Performance test	§60.8(d)
Projected and actual VOC use (if <130 or <95 Mg/yr)	§60.747(b), §60.747(c)

Reports	
Performance test results	§60.747(a), §60.8(a)
Quarterly reports of excess emissions or periods of noncompliance	§§60.747(d)(1)-(6), §60.747(e)(2), §60.747(f)
Semiannual reports of no excess emissions/deviations from operating parameters	§60.747(d)(7), §60.747(e)(1)

A source must keep the following records:

Recordkeeping	
Maintain records of startups, shutdowns, malfunctions, or periods where the continuous monitoring system is inoperative	§60.7(b)
Records for performance test measurements	§60.8(c)
Record projected VOC use and actual 12-month VOC use, operating parameters (e.g., concentration level of organic compounds, periods of actual coating operations, system efficiency, average combustion temperature, gas temperature before and after the catalytic bed) of the control device (e.g., carbon absorption system, thermal incinerator, and catalytic incinerator); and other parameters, depending on the compliance method being used	§60.747(c)(1), §60.747(d)
Maintain records for sources with continuous monitoring systems	§60.7(f)
Retain records for two years	§60.747(h)

12c. RESPONDENT ACTIVITIES

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate monitoring devices to monitor concentration levels of organic compounds, combustion temperature, gas temperature, or other values of the chosen parameter, depending on the control device used.
Monitor projected and actual VOC use.
Perform initial performance tests, Reference Method 1, 1A, 2, 2A, 2C, 2D, 3, 4, 18, 24, 25, and 25A tests, 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.

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 – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal).

12d. RESPONDENT BURDEN HOURS AND LABOR COSTS

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 16,900 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulations, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

This ICR uses the following labor rates:

- Managerial \$163.17 (\$77.70 + 110%)
- Technical \$130.28 (\$62.04 + 110%)
- Clerical \$65.71 (\$31.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "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.

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.

13. RESPONDENT CAPITAL AND O&M COSTS:

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

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 other costs such as photocopying and postage.

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 ^b	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F)

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
				^b		
VOC Monitor	\$56,726	1	\$56,726	\$12,054	76	\$916,121
Temperature Monitor	\$12,054	1	\$12,054	\$2,836	76	\$215,558
Total ^a			\$68,800			\$1,130,000

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

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

The total capital/startup costs for this ICR are \$68,800. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$1,130,000. 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 \$1,200,000. These are the recordkeeping costs.

14. AGENCY COSTS:

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. 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.

14b. Agency Burden and Labor Cost

The only costs to the Agency are those costs associated with analysis of the reported information. 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 burden and cost over next three years is estimated to be 950 labor hours at a cost of \$50,400. See Table 2: Average Annual EPA Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal).

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

Managerial	\$73.46 (GS-13, Step 5, \$45.91 + 60%)
Technical	\$54.51 (GS-12, Step 1, \$34.07 + 60%)
Clerical	\$29.50 (GS-6, Step 3, \$18.44 + 60%)

These rates are from the Office of Personnel Management (OPM), 2023 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 appear at the end of this document in Table 2: Average Annual EPA Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (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.

14c. Agency Non-Labor Costs

There are no anticipated non-labor costs for the Agency.

15. CHANGE IN BURDEN:

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

There is an adjustment increase in the respondent burden, and O&M cost from the most recently approved ICR. This increase is not due to any program changes. The change in burden and costs is due to an increase in the number of respondents. This ICR assumes an industry growth rate of one new facility per year plus 4 new coating lines per year at existing facilities, totaling an increase of 5 respondents. There is also an increase in labor costs due to the use of updated labor rates. This ICR uses labor rates from the most recent Bureau of Labor Statistics report (September 2022) to calculate respondent burden costs. The industry growth also results in an increase in capital and O&M costs. Additionally, the capital and O&M costs were increased from 2008 to 2022 \$ using the CEPCI Equipment Cost Index.

16. PUBLICATION OF DATA:

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

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 quarterly and 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. The EPA and its delegated authorities can edit, store, retrieve and analyze the data.

17. DISPLAY OF OMB CONTROL NUMBER AND EXPIRATION DATE ON INSTRUMENTS:

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. CERTIFICATION STATEMENT:

Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.

BURDEN STATEMENT

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 79 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information 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.

ADDITIONAL TABLES AND APPENDICES

Table 1: Annual Respondent Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal)

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per responden t per year (C=AxB)	(D) Respondents per year ^a	(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
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarize with the regulatory requirements ^c	1	1	1	77	77	3.85	7.7	\$11,165.73
B. Required activities								
Initial performance test	280	1	280	5	1400	70	140	\$203,013.30
Repeat performance test ^d	280	1	280	1	280	14	28	\$40,602.66
Monthly compliance test ^e	90	12	1080	1	1080	54	108	\$156,610.26
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
Notification of construction/	2	1	2	5	10	0.5	1	\$1,450.10

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per responde nt per year (C=AxB)	(D) Respondents per year ^a	(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
reconstruction								
Notification of actual startup	2	1	2	5	10	0.5	1	\$1,450.10
Notification of initial performance test	2	1	2	5	10	0.5	1	\$1,450.10
Notification of VOC use at end of initial year ^f	2	1	2	1	2	0.1	0.2	\$290.02
Report of performance test	See 3B							
Report of monitoring exceedances and non-compliance periods ^g	16	4	64	15	960	48	96	\$139,209.12
Report of no excess emissions ^h	8	2	16	62	992	49.6	99.2	\$143,849.42
Report when 1st projected VOC use exceeds cutoff	2	1	2	2	4	0.2	0.4	\$580.04
Report when 1st actual 12-month VOC use exceeds cutoff ⁱ	2	1	2	0	0	0	0	\$0
Notification of changes ^j	4	1	4	5	20	1	2	\$2,900.19
Subtotal for Reporting Requirements					5,572			\$702,571

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per responde nt per year (C=AxB)	(D) Respondents per year ^a	(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
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	2887.5	144.375	288.75	\$418,714.93
Records of operating parameters ^l	0.25	350	87.5	77	6,737.50	336.875	673.75	\$977,001.51
Records of semiannual projected VOC use estimate ^m	1	2	2	15	30	1.5	3	\$4,350.29
Records of 12-month actual VOC use ^m	1	12	12	15	180	9	18	\$26,101.71
F. Train personnel	N/A							

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per responden t per year (C=AxB)	(D) Respondents per year ^a	(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
G. Audits	N/A							
Subtotal for Recordkeeping Requirements					11,310			\$1,426,168
Total Labor Burden and Costs (rounded) ⁿ					16,900			\$2,130,000
Total Capital and O&M Cost (rounded) ⁿ								\$1,200,000
GRAND TOTAL (rounded) ⁿ								\$3,330,000

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

^b This ICR uses the following labor rates: Managerial \$163.17 (\$77.70 + 110%); Technical \$130.28 (\$62.04 + 110%); and Clerical \$65.71 (\$31.29 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "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 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 monthly compliance testing.

^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 quarterly basis ($77 \times 20\% = 15$, after rounding). These plants 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 footnote a, EPA estimates one new plant 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 ($50/2 = 25$).

^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.

Table 2: Average Annual EPA Burden and Cost - NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal)

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) Respondent s per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
New facilities								
Notification of construction/reconstruction	2	1	2	5	10	0.5	1	\$611.33
Notification of actual startup	2	1	2	5	10	0.5	1	\$611.33
Notification of initial performance test	2	1	2	5	10	0.5	1	\$611.33
Notification of VOC use at end of initial year	2	1	2	1	2	0.1	0.2	\$122.27
Performance test results	8	1	8	5	40	2	4	\$2,445.32
New and existing facilities								
Report of monitoring exceedances and non-compliance periods ^c	8	4	32	15	492.8	24.64	49.28	\$30,126.34
Report of no excess	2	2	4	62	246.4	12.32	24.64	\$15,063.17

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) Respondent s per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
emissions ^d								
Report when 1st projected VOC use exceeds cutoff	2	1	2	2	4	0.2	0.4	\$244.53
Report when 1st actual 12-month VOC use exceeds cutoff ^e	2	1	2	0	0	0.0	0	\$0
Notification of changes ^f	2	1	2	5	10	0.5	1	\$611.33
TOTAL (rounded) ^g					950			\$50,400

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 of this ICR. This ICR assumes 4 existing plants per year 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-12, Step 1, \$34.07 + 60%); and Clerical \$29.50 (GS-6, Step 3, \$18.44 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 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 This ICR assumes 20 percent of existing and new plants will report monitoring exceedances or non-compliance periods on a quarterly basis ($77 \times 20\% = 15$, after rounding). These 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 rounding).

^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. Per footnote a, EPA estimates one new 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.