

U.S. Environmental Protection Agency

Information Collection Request

TITLE: NESHAP for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (Renewal)

OMB CONTROL NUMBER: 2060-0487

EPA ICR NUMBER: 1957.11

ABSTRACT:

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) were promulgated on June 10, 2002, and most recently amended on February 25, 2020. These regulations apply to existing facilities and new facilities that are major sources of hazardous air pollutants (HAP) at which a coil coating line is operated. A coil coating line is a process in which special equipment is used to apply an organic coating to the surface of metal coils; the affected source at each plant site is the collection of all coil coating lines at the site. The provisions of this Subpart do not apply to coil coating lines that are part of research or laboratory equipment or coil coating lines on which at least 85 percent of the metal coil coated, based on surface area, is less than 0.15 millimeters (0.006 inches) thick, unless the coating line is controlled by a common control device. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart SSSS.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. 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 that are major sources of hazardous air pollutants (HAP) where a coil coating line is operated. The "burden" to the "Affected Public" may be found in Table 1: Annual Respondent Burden and Cost - NESHAP for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (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 - NESHAP for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (Renewal).

There are approximately 48 metal coil surface coating facilities, which are owned and operated by the metal coil coating industry. None of the 48 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 facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 48 respondents per year will be subject to the standard, and no additional respondents 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 4(b) of this document. We have created a supplementary document including the regulatory text that describes the ICR requirements as identified in section 4(b)(i) of this document as requested. All electronic collection in this information collection is submitted through EPA's CEDRI or ERT, as discussed in section 4(b)(i) of this document. Additional Paperwork Reduction Act requirements for CEDRI and ERT, including the burden statement and OMB control number, are available at: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>. We have created supplementary documents that include screenshots of the electronic portal where the reporting requirements are submitted online to EPA, including the OMB burden statement on the electronic portal.

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 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C)

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

In the Administrator's judgment, HAP emissions from facilities engaged in metal coil surface coating either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart SSSS.

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 the 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 the standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

Additionally, the EPA is requiring electronic reporting for certain notifications or reports. The EPA is requiring that owners or operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b), notifications of change in information already provided required in 40 CFR 63.9(j), performance test reports, notifications of compliance and initial notification reports, and semiannual reports through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For semiannual reports, EPA has developed a template for the reporting form in CEDRI specifically for 40 CFR Part 63, Subpart SSSS. For the notifications required in 40 CFR 63.9(b) and 63.9(j), owners and operators would be required to upload a PDF of the required notifications.

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests. EPA is also requiring that 40 CFR Part 63, Subpart SSSS performance test reports be submitted through the EPA's ERT.

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.

The rule was amended to include electronic reporting provisions on February 25, 2020. Respondents are required to use the EPA's Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. Respondents are also required to submit electronic copies of notifications and certain reports through EPA's CEDRI. The notification is an upload of their currently required notification in portable document format (PDF) file. The semiannual reports are to be created using Form 5900-0526, the electronic template included with this Supporting Statement. The template is an Excel spreadsheet which can be partially completed and saved for subsequent semiannual reports to limit some of the repetitive data entry. It reflects the reporting elements required by the rule and does not impose additional reporting elements. The OMB Control Number is displayed on the Welcome page of the template, with a link to an online repository that contains the PRA requirements. For purposes of this ICR, it is assumed that there is no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically. The supplemental files to this ICR renewal contain screenshots showing the CDX homepage for CEDRI login, the CEDRI PRA screen, the CEDRI interface for managing reports for various subparts, and the landing page of the ERT that shows the link to PRA information.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

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.

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

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).

With the following exception, these reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant

violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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* (FR citation, e.g., 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 48 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 the National Coil Coating Association at (216) 241-7333 and the American Coatings Association (ACA) at (202) 462-6272. The National Coil Coating Association indicated that among their member companies, one new coating line is expected to be installed at one new facility every two years. However, no information was provided regarding growth or decline in non-member companies or for closed or shutdown facilities in general. The agency's internal data sources indicate there may have been a decline in overall respondent count over the last three years. Because we do not have enough information to determine the net change in respondent count, we have assumed that there are still 48 respondents on average per year with no additional respondents expected in the three-year period covered by this ICR renewal.

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 (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 the standard 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.*
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12a. RESPONDENTS/NAICS CODES

The respondents to the recordkeeping and reporting requirements are facilities engaged in metal coil surface coating. The United States Standard Industrial Classification (SIC) code for the respondents affected by these standards, and the corresponding North American Industry Classification System (NAICS) codes are listed below.

Standard (40 CFR Part 63, Subpart SSSS)	SIC Codes	NAICS Codes
Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	3479	332812
Gasket, Packing, and Sealing Device Manufacturing	3053	339991
Iron and Steel Mills and Ferroalloy Manufacturing	3313	331110
Rolled Steel Shape Manufacturing	3312	331221
Alumina Refining and Primary Aluminum Production	3334	331313
Aluminum Sheet, Plate, and Foil Manufacturing	3353	331315
Other Aluminum Rolling, Drawing, and Extruding	3355	331318
Copper Rolling, Drawing, Extruding, and Alloying	3341	331420
Fabricated Structural Metal Manufacturing	3441	332312
Sheet Metal Work Manufacturing	3444	332322
Prefabricated Metal Building and Component Manufacturing	3448	332311
All Other Miscellaneous Fabricated Metal Product Manufacturing	3499	332999
Blind and Shade Manufacturing	2591	337920
Photographic Film, Paper, Plate, and Chemical Manufacturing	3861	325992

Based on our research for this ICR, on average over the next three years, approximately 48 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 48 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	48	0	0	48

Number of Respondents					
2	0	48	0	0	48
3	0	48	0	0	48
Average	0	48	0	0	48

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 48.

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 $E=(B \times C)+D$
Initial notification	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of compliance status	0	1	0	0
Performance test notification	4.41	1	0	4.41
Performance test report	4.41	1	0	4.41
Semiannual report of exceedances	5	2	0	10
Semiannual report of no exceedances	43	2	0	86
Startup, shutdown, malfunction report	0	2	0	0
			Total	105

The number of Total Annual Responses is 105.

The total annual labor costs are \$2,050,000 (rounded). Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Metal Coil Surface Coating Plants (40 CFR Part 63, Subpart SSSS) (Renewal).

12b. INFORMATION REQUESTED

In this ICR, all the data that are recorded or reported is required by the NESHAP for Metal Coil Surface Coating Plants (40 CFR Part 63, Subpart SSSS) (Renewal).

A source must make the following reports:

Notifications	
Notification and application of construction or reconstruction, existing sources	§63.5180(b)(1), §§63.9(b)(1)-(2)
Notification of anticipated date of initial startup	§63.5180(b)(2), §63.9(b)(4)
Notification of intent to construct or reconstruct, new or reconstructed sources	§63.5180(b)(2), §§63.9(b)(4)-(5)
Notification of actual startup, new or reconstructed sources	§63.5180(b)(2), §§63.9(b)(4)-(5)
Notification of performance tests	§63.5180(c), §63.5180(f), §63.7(b), §§63.9(e)-(g)
Notification of compliance status (electronic submission)	§63.5180(d), §63.9(h)
Notification of changes in information (reclassification to area source status or to revert to major source status) (electronic submission)	§63.9(b), §63.9(j)

Reports	
Report of performance test (electronic submission)	§63.5180(e), §63.5180(i), §63.5181(a), §63.10(d)(2)
Semiannual compliance report of no deviation (electronic submission)	§63.5180(g), §63.10(d)(5)
Semiannual compliance report of deviation (electronic submission)	§63.5180(h)-(i), §63.10(d)(5)

A source must keep the following records:

Recordkeeping	
Maintain records of all reports	§§63.5190(a)-(c)
Maintain documentation of corrective action procedures	§63.5180(f)(1), §§63.5180(h)(2)-(3)

12c. RESPONDENT ACTIVITIES

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CPMS for operating limit parameters for emission capture systems and for add-on control devices, if using them to demonstrate compliance.
Perform initial performance test, using applicable methods: Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 18, 24, 25, 25A, 204, 204A, 204B, 204C, 204D, 204E, 204F, 301, 311, ASTM Methods D2697-86, D1475-90, D2111-10 (2015), D2369-10 (2015). Test and repeat performance tests if using an emission capture system and add-on control device to demonstrate compliance.
If owner or operator chooses to account for the mass of organic HAP in wastewater, Reference Method 25D, 301, 305, 624, 625, 1624, 1625.
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 – NESHAP for Metal Coil Surface Coating Plants (40 CFR Part 63, Subpart SSSS) (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 16,200 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

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.

The total annual labor hours are 16,200. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Metal Coil Surface Coating Plants (40 CFR Part 63, Subpart SSSS) (Renewal).

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

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 155 hours per response.

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 standard(s) are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to these

regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor 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	Number of 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)
Continuous temperature monitor ^a	\$0	0	\$0	\$1,200	48	\$57,600
Performance Test ^b	\$18,750 / \$14,063	4.41	\$108,001	\$0	0	\$0
Total ^c			\$108,000			\$57,600

^a The O&M cost to maintain continuous temperature measuring monitor is \$1,200 per respondent. The cost covers replacement of temperature sensor each calendar year.

^b Emissions compliance testing costs are treated as capital costs because facilities routinely contract with a testing company to perform the testing. No O&M costs would be assumed to be associated with the periodic testing requirement. Assumes nine sources test two control devices each at a cost of \$32,813 once every five years. Twelve sources test one control device each at a cost of \$18,750 once every five years. Five percent of tests will be repeated at a cost of \$18,750 each. Total test costs are divided by five years to estimate average capital cost per year.

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

The total capital/startup costs for this ICR are \$108,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$57,600. 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 \$166,000. These are recordkeeping costs.

The total annual capital/startup and O&M costs to the regulated entity are \$166,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) 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

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.

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 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. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

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

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 cost during the three years of the ICR is estimated to be \$18,600.

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 – NESHAP for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (Renewal).

The average annual Agency burden and cost over next three years is estimated to be 351 labor hours at a cost of \$18,600. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (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 decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. The previous burden estimate assumed 21 facilities would conduct performance tests in year three of the rulemaking ICR, assumed respondents would incur burden to revise record systems due to the amendments, and to become familiar with the EPA's CEDRI for electronic reporting. This ICR reflects the ongoing burden for sources to comply with periodic testing requirements once every five years and assumes respondents will not incur additional burden for revising record systems due to the previous rule amendments or for familiarization with CEDRI. Additionally, the reporting burden is decreased because sources are no longer required to submit startup, shutdown, malfunction reports. There was also a decrease in capital and O&M costs due to the adjustment to reflect the ongoing periodic testing that is required once every five years.

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.

Although this rule does not require electronic reporting, respondents could choose to submit notifications or reports electronically. All non-CBI data submitted electronically to the Agency through CEDRI are available to the public for review and printing and are accessible using WebFIRE. Electronically submitted emissions data from performance testing or performance evaluations using the Electronic Reporting Tool or templates attached to CEDRI, as well as data from reports from regulations with electronic templates, are tabulated; data submitted as portable document format (PDF) files attached to CEDRI are neither tabulated nor subject to complex analytical techniques. Electronically submitted emissions data used to develop emissions factors undergo complex analytical techniques and the draft emissions factors are available on the Clearinghouse for Inventories and Emission Factors listserv at <https://www.epa.gov/chief/chief-listserv> for public review and printing. Electronically submitted emissions data, as <https://www.regulations.gov/> for public review and printing.

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 155 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.

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-2017-0685. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1927. 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-2017-0685 and OMB Control Number 2060-0487 in any correspondence.

ADDITIONAL TABLES AND APPENDICES

Table 1: Annual Respondent Burden and Cost – NESHAP for Metal Coil Surface Coating Plants (40 CFR Part 63, Subpart SSSS) (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) 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. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarization with the regulatory requirements ^a	4	1	4	48	192	9.6	19.2	\$27,846.05
B. Required activities								
Initial oxidizer performance test ^c	30	0.07	2.1	0	0	0	0	\$0.00
Repeat oxidizer performance test ^c	30	0.07	2.1	0	0	0	0	\$0.00
Initial capture performance test, or review design criteria to ensure capture system meets design criteria for a permanent total enclosure (PTE) ^{c,d}	8	0.07	0.56	0	0	0	0	\$0.00
Repeat capture performance test ^{c,d}	8	0.07	0.56	0	0	0	0	\$0.00
Add-on control performance test ^e	30	1	30	4.2	126	6.3	12.6	\$18,273.97
Repeat add-on control performance test ^f	30	1	30	0.21	6	0	1	\$913.70
Emission rate limit compliance determination	16	12	192	0	0	0	0	\$0.00
Startup, shutdown, malfunction plan	32	1	32	0	0	0	0.0	\$0.00
C. Create information	See 4B							
D. Gather existing information ^g	60	1	60	48	2880	144	288.0	\$417,690.72

E. Write Report								
Initial notification	2	1	2	0	0	0	0.0	\$0.00
Notification of construction/reconstruction	2	1	2	0	0	0	0.0	\$0.00
Notification of actual startup	2	1	2	0	0	0	0.0	\$0.00
Notification of compliance status	4	1	4	0	0	0	0.0	\$0.00
Performance test notification ^{e,f}	2	1	2	4.41	9	0.441	0.9	\$1,279.18
Performance test report ^{e,f}	10	1	10	4.41	44	2.205	4.4	\$6,395.89
Semiannual report of exceedances ^h	16	2	32	5	160	8	16.0	\$23,205.04
Semiannual report of no exceedances ^{i,j}	8	2	16	43	688	34.4	68.8	\$99,781.67
Startup, shutdown, malfunction report ^k	8	2	16	0	0	0	0.0	\$0.00
Subtotal for Reporting Requirements					4,721			\$595,386
2. Recordkeeping requirements								
4. Recordkeeping requirements								
A. Familiarization with the regulatory requirements	See 4B							
B. Plan activities	N/A							
C. Implement Activities	N/A							
D. Develop record system	N/A							
E. Revise record systems due to SSM revisions ^l	8	1	8	0	0	0	0	\$0.00
F. Become familiar with CEDRI for electronic filing of notifications and reports ^m	8	1	8	0	0	0	0	\$0.00
G. Time to enter records of all information required by standards ⁿ	4	52	208	48	9984	499.2	998.4	\$1,447,994.50
H. Time to train personnel	N/A							

I. Time to adjust existing ways to comply with previously applicable requirements	N/A							
J. Time to transmit or disclose information ^o	0.25	2	0.5	48	24	1.2	2.4	\$3,480.76
K. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					11,509			\$1,451,475
Total Labor Burden and Cost (rounded) ^p					16,200			\$2,050,000
Total Capital and O&M Cost (rounded) ^p								\$166,000
GRAND TOTAL (rounded) ^p								\$2,220,000

Assumptions:

^a We have assumed that there are approximately 48 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years. This ICR assumes each respondent will incur a burden to re-familiarize themselves with the regulatory requirements each year.

^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, January 2023, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c This is a one-time startup cost associated with initial compliance determination and acquisition, installation, and utilization of technology and systems needed to support recordkeeping and reporting. The one-time startup costs were annualized over the 15-year life of control equipment at 7 percent interest. The number of occurrences per respondent per year is annualized over the 15 year life of the control equipment. Because there are no new sources, no performance tests are expected to occur. It is assumed that the facility would contract out the performance testing costs, but some labor hours from facility staff would be involved with coordinating and observing the test and reviewing the results.

^d We have assumed that emission capture systems meet the design criteria for a permanent total enclosure in EPA Method 204, so that capture efficiency does not need to be measured.

^e Facilities that comply using emission capture systems and add-on controls conduct air emissions performance testing, within 3 years of the effective date of the revised standards. Labor totals include hours for the facility to obtain the testing contractor, plan and attend the test, review the test report, and load it to ERT. A permit review revealed that, of the 48 sources subject to Subpart SSSS, 30 add on control devices at 21 sources do not already have a permit testing requirement. 21 sources undergo testing of their control devices once every five years (21 sources/5 years = 4.2 sources per year).

^f It is assumed that 5 percent of respondents will have to repeat performance tests. (4.2 x 0.05 = 0.21 per year)

^g Based on comments we received from industry consultation, 60 hrs per respondent is required to gather and evaluate information in preparation of semiannual reports.

^h We have assumed that exceedances are reported semiannually. We have assumed that 10 percent of respondents will report exceedances ($48 \times 0.1 = 4.8$, or 5 respondents, when rounded).

ⁱ Reports indicating no exceedances are required semiannually.

^j We have assumed that 90 percent of respondents will report no exceedances ($48 \times 0.9 = 43.2$, or 43 respondents, when rounded).

^k We have assumed that 10 percent of respondents will file a startup, shutdown, malfunction report semiannually ($48 \times 0.1 = 4.8$, or 5 respondents, when rounded). This requirement is not applicable on and after August 24, 2020.

^l We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously developed SSM record systems in year one. Costs are also associated with the use of electronic reporting and include time to become familiar with CEDRI and the semi-annual reporting form.

^m Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the semi-annual reporting form.

ⁿ We have assumed that all information is entered on a weekly basis.

^o We have assumed that each of the 48 respondents will take 15 minutes to transmit or disclose information twice a year.

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

Table 2: Average Annual EPA Burden and Cost - NESHAP for Metal Coil Surface Coating Plants (40 CFR Part 63, Subpart SSSS) (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) 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
Initial performance test ^a	48	0	0	0	0	0	0	\$0
Repeat performance test-retesting preparation	4	0	0	0	0	0	0	\$0
Repeat performance-retesting	48	0	0	0	0	0	0	\$0
Excess emissions enforcement activities	120	1	120	0	0	0	0	\$0
Review reports								
Notification of applicability	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of special compliance requirements	N/A							
Notification of compliance status	2	1	2	0	0	0	0	\$0
Notification of performance test ^c	4	1	4	4.41	17.64	0.882	1.764	\$1,078
Review of initial performance test report ^d	8	1	8	4.2	33.6	1.68	3.36	\$2,054
Review of repeat performance test report ^d	8	1	8	0.21	1.68	0.084	0.168	\$103

Semiannual report of excess emissions ^{e, f}	8	2	16	5	80	4	8	\$4,891
Semiannual report of no excess emissions ^{g, h}	2	2	4	43	172	8.6	17.2	\$10,515
Review of NESHAP waiver application	N/A							
Review startup, shutdown, malfunction report ⁱ	2	2	4	0	0	0	0	\$0
Review record systems due to SSM revisions ^j	2	2	4	0	0	0	0	\$0
TOTAL (rounded)^h					351			\$18,600

Assumptions:

^a We have assumed that there are approximately 48 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years. This ICR assumes each respondent will incur a burden to re-familiarize themselves with the regulatory requirements each year.

^b This cost is based on the average hourly labor rate as follows: Managerial \$73.46 (GS-13, Step 5, \$44.91 + 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 It is assumed that it will take four hours to review the notification of the test and the test plan for each respondent.

^d Facilities that comply using emission capture systems and add-on controls conduct air emissions performance testing, within 3 years of the effective date of the revised standards. 21 facilities utilize 30 add-on VOC/HAP control devices and would require testing once every five years (21 sources/5 years = 4.2 sources per year). It is assumed that 5 percent of respondents will have to repeat performance tests. (4.2 x 0.05 = 0.21 per year)

^e It is assumed that 10 percent of respondents will report excess emissions (48 x 0.1 = 4.8, or 5 respondents, when rounded).

^f It is assumed that reports of excess emissions are required semiannually.

^g We have assumed that 90 percent of respondents will report no excess emissions (48 x 0.9 = 43.2, or 43 respondents, when rounded).

^h It is assumed that reports of no excess emissions are required semiannually.

ⁱ We have assumed that 10 percent of respondents will submit startup, shutdown, malfunction reports to be reviewed (48 x 0.1 = 4.8, or 5 respondents, when rounded). This requirement is not applicable on and after August 24, 2020.

^j These are costs associated with evaluating new SSM record systems in year one of the 2020 rule amendments.

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

Appendix A - Draft Electronic Reporting Template
(see Docket ID Number EPA-HQ-OAR-2017-0685)