

U.S. Environmental Protection Agency

Information Collection Request

Title: National Volatile Organic Compound (VOC) Emission Standards for Aerosol Coatings (40 CFR Part 59, Subpart E) (Proposed Rule)

OMB Control Number: 2060-0617

EPA ICR Number: 2289.06

Abstract: The National Volatile Organic Compound Emission Standards for Aerosol Coatings (40 CFR Part 59, Subpart E) were proposed on July 16, 2007; promulgated on March 24, 2008; and amended on: November 7, 2008; December 24, 2008; June 23, 2009; and March 9, 2012. These regulations apply to both existing and new manufacturers or importers of an aerosol coating product and a distributor of an aerosol coating product if it is either named on the label or if it specifies the formulation of the product. This information is being collected to assure compliance with 40 CFR Part 59, Subpart E. This ICR includes the burden for the current rule and the incremental burden associated with revisions to the rule which were previously proposed on September 17, 2021.

The current rule requires regulated entities to submit an Initial Notification to the U.S. Environmental Protection Agency (EPA) at least 90 days before the compliance date. The initial notification requests basic information about regulated entities, including contact information of the certifying official. Other required information includes: (1) a product date code system used to label products and the category code system, if the facility is not using the default category codes included in Table 1 of the rule; and (2) a revised notification if there is a change in the information in the Initial Notification, with the exception of changes to product formulations. The regulated entity is not required to submit a revised notification if the volatile organic compounds (VOC) formulations submitted in its Initial Notification change; also: (3) a revised notification if the manufacturer, for example, adds a new coating category, changes the product date code system or batch definition, or begins to use a VOC that is not listed in the rule; and (4) maintain compliance calculations for each of its aerosol coatings formulations, records of the date(s) the batch was manufactured, the volume of the batch, and the VOC formula for the formulation. Records of these calculations must be maintained for 5 years after the product is manufactured, processed, distributed for wholesale, or imported for sale or distribution in interstate commerce in the United States, and the regulated entity must supply this information to the EPA within 60 days of a written request. Each regulated entity is required to submit a triennial report. The triennial report provides updated VOC formulation data and, for each VOC formulation, the total mass of each individual VOC or mixture used as ingredients in the aerosol coatings manufactured, imported, or distributed that year. This information must be provided only for the second year of the triennial reporting cycle, depending upon the date the regulated entity became subject to the rule. Subsequent reports are required at 3-year intervals.

In this rule, the EPA is updating coating category product-weighted reactivity (PWR) limits, adding new compounds and reactivity factors, updating existing reactivity factors, revising the rule's default reactivity factor, amending thresholds for VOC regulated by the rule, amending reporting requirements

to add electronic reporting, updating test methods to reflect more recent versions, adding a new compliance date, and making clarifying edits.

New and existing regulated entities will have to submit an initial notification report. Regulated entities will also be required to submit notifications of changes in the products, or company information, and to maintain records. In addition, regulated entities will be required to submit triennial reports of formulation data and VOC usage. All reports are to be submitted through CEDRI to the U.S. Environmental Protection Agency Regional Office for the address listed on the aerosol coating product.

The Office of Management and Budget (OMB) approved the currently-active ICR with the following "Terms of Clearance":

"Upon resubmission, the program must use the standard 18 question Supporting Statement format."

In response to the Terms of Clearance, the EPA is using the standard 18 question Supporting Statement format for this ICR renewal.

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 183 (e) of the Clean Air Act (CAA), as amended, to establish emission standards for aerosol coatings. Section 183(e) of the CAA requires the EPA to regulate consumer or commercial products that account for at least 80 percent of the VOC emissions, on a reactivity-adjusted basis, in areas that violate the national ambient air quality standards for ozone. The CAA also directs the EPA to divide either the consumer or commercial products into four groups, and establish priorities for regulation until all four groups are regulated. Of the 22 source categories identified and divided into four groups, the aerosol coatings source category is in Group III.

The information collection requirements are based on recordkeeping and reporting requirements. These recordkeeping and reporting requirements are specifically authorized by CAA section 114 (42 U.S.C. 7414). Initial notifications and reports, as described in this information collection request, are necessary to enable the Administrator to determine if the standards are being achieved. The emission standards require an initial notification report from all regulated entities to the EPA 90 days before the compliance date. The regulated entity is required to maintain compliance calculations for each of its aerosol coatings formulations. Records of these calculations must be maintained 5 years after the product is manufactured, processed, distributed for wholesale, or imported for sale or distribution in interstate commerce in the United States. The retention of records for 5 years would allow the EPA to establish the compliance history of a regulated entity and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, the EPA has found that the most flagrant violators frequently have violations extending beyond the 5 years. The EPA would be prevented from pursuing the worst violators due to either the destruction or nonexistence of records, if records were retained for less than 5 years.

Respondents seeking a variance are required to submit an application which includes the grounds upon which the variance is being sought, the proposed date for coming into compliance, and a plan for achieving compliance. Similarly, some respondents may qualify for, and seek, either a small quantity manufacturer exemption or a compliance extension. The estimates for completing these reports are included in the estimates for the Initial Notification.

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 data collected under this ICR are essential to ensure compliance with the rule and to evaluate its effectiveness. Agency enforcement personnel will use the information collected to: (1) identify manufacturers and importers subject to the rule; and (2) ensure that consumer products comply with the VOC content standards; and (3) to better assess the efficacy of the reactivity-based approach, including the manner in which the program's requirements are being achieved. These activities are essential to compliance assurance.

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.

This rule includes electronic reporting provisions. Respondents will be required to submit electronic copies of certain notifications through the EPA's CEDRI. The initial notifications and triennial compliance reports are to be created using Form 5900-494, the electronic template included with this Supporting Statement. The template is an Excel spreadsheet which can be partially completed and saved for subsequent triennial 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 the purposes of this ICR, it is assumed that there is no additional burden associated with the requirement for respondents to submit the notifications and reports electronically beyond initial registration and familiarization with the reporting system. The supplemental files to this ICR renewal contain screenshots showing the CDX homepage for CEDRI login, the CEDRI PRA screen, and the CEDRI interface for managing reports for various subparts, and the landing page 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 the 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.

5. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES

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

The 1EPA has included a small quantity manufacturer exemption. This exemption is targeted to particularly small entities that would otherwise bear particularly high costs for compliance relative to the small amount of products they produce and, therefore, the small amount of total VOC emissions from such products. In addition, there are provisions that allow facilities additional time to develop compliant products if they have not previously developed products to meet the limits of the California Air Resource Board aerosol coating regulation, which contains identical emission limits to the EPA's rule, with the exception of the emission limit for the default reactivity factor. The EPA maintains that the majority of facilities that would qualify for this extended compliance time would likely be small entities. Finally, companies subject to the rule can apply for variances in cases where the company, because of extraordinary reasons beyond reasonable control, cannot comply with the rule. While all variance applications will receive scrutiny, the EPA will give full consideration to the special needs of small manufacturers and importers.

6. CONSEQUENCES 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.

This ICR rule includes the minimum requirements needed to demonstrate compliance with the rule. 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 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 OMB guidelines.

This ICR adheres to the guidelines for Federal data requesters, as provided at 5 CFR 1320.6. Initial notifications and reports, as described in this ICR, are necessary to enable the Administrator to

determine if these standards are being achieved. The emission standards require an initial notification report from all regulated entities to the EPA 90 days before the compliance date. The regulated entity is required to maintain compliance calculations for each of its aerosol coatings formulations. Records of these calculations must be maintained 5 years after the product is manufactured, processed, distributed for wholesale, or imported for sale or distribution in interstate commerce in the United States. The retention of records for 5 years would allow the EPA to establish the compliance history of a regulated entity and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, the EPA has found that the most flagrant violators frequently have violations extending beyond 5 years. The EPA would be prevented from pursuing the worst violators due to either the destruction or nonexistence of records, if records were retained for less than 5 years. Triennial reports of formulation and usage data are also required.

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 this ICR was published in the *Federal Register* (86 FR 19256) on September 17, 2021. The EPA generally received supportive comments for the addition of electronic reporting, including recommendations to improve the proposed reporting template. Additionally, some commenters, mainly aerosol industry representatives, objected to the current rule's requirement to submit triennial reports, stating that mandatory reporting is unnecessarily burdensome. The EPA has determined that triennial reporting of formulation data is needed. The triennial reporting enables the EPA to better assess the efficacy of the reactivity-based approach, including the manner in which the programs requirements are being achieved. Therefore, we have made no adjustments to the burden estimates based on the comment.

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (89 FR 63933) on August 6, 2024. 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 six respondents will be subject to the standard over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with 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 American Coatings Association at (202) 462-6272, and Sherwin Williams at (800) 474-3794. In this case, no comments were received.

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.

No payments or gifts are made to respondents.

10. ASSURANCE OF CONFIDENTIALITY

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 & 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. Generally, estimates should not include burden hours for customary and usual business practices.*

- *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 manufacturers, distributors and importers of aerosol coatings. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards and their corresponding North American Industry Classification System (NAICS) codes are listed below:

Standard (40 CFR Part 59, Subpart E)	SIC Codes	NAICS Codes
Paint and Coating Manufacturing	2851, 2899	325510
All Other Miscellaneous Chemical Production and Preparation Manufacturing	2869	325998

Based on our research for this ICR, on average over the next three years, approximately 47 existing respondents will be subject to the standard. It is estimated that one additional respondent per year will become subject, for an overall total of 48 respondents per year. The number of respondents is calculated using the table Number of Respondents that addresses the three years covered by this ICR. None of the facilities in the United States are owned by either state, local, or tribal entities or by the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries. Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

The total number of annual responses per year is calculated using the table Total Annual Responses shown below. The number of Total Annual Responses is 83.

12b. Information Requested

In this ICR, all the data that are recorded or reported is required by the National Volatile Organic Compound (VOC) Emission Standards for Aerosol Coatings (40 CFR Part 59, Subpart E). 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.

A source must make the following reports:

Notifications and Reports	
Application for a variance	§§59.509(a)-(f)
Initial notification	§59.511(a), §59.511(b)
Notification of change in information (supplemental reports)	§59.511(c)
Report of product information to EPA upon request	§59.511(d)
Claim of exemption for small quantity manufacturer	§59.511(e)
Claim of exemption for entity that manufactures or processes aerosol coatings outside of the United States	§59.511(f)
Certification of maintaining records for a regulated entity	§59.511(g)
Revocation of the written certification in §59.511(g)	§59.511(h)
Triennial report of formulation and usage data	§59.511(i)
Initial notification and triennial report (electronic submission)	§§59.509(g), 59.511(k)

A source must keep the following records:

Recordkeeping	
Maintain product records	§59.510(a)
Maintain records of product category, all product calculations, the product-weighted reactivity (PWR), and the weight fraction of all ingredients	§59.510(a)(2)
Maintain a copy of each notification and report that you submit to comply with this subpart, and the documentation supporting each notification	§59.510(a)(3)
Maintain a copy of the label for each product	§59.510(a)(3)
Maintain a copy of the initial report and each annual report that you submit to EPA, and the documentation supporting such report, for any exemption claimed	§59.510(a)(4)
Maintain records for a minimum of five years	§59.510(a)(5)

Recordkeeping	

12c. Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
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.

12d. Respondent Burden Hours and Labor Costs

Tables 1 through 3 document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 9,562 hours (Average Total Labor Hours from the Three Year Summary table). 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 \$130.58 (\$62.18 + 110%)

Technical	\$80.22 (\$38.20 + 110%)
Clerical	\$50.30 (\$23.95 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2023 National Occupational Employment and Wage Estimates, for occupational groups 11-1021 (managerial), 51-8091 (technical), and 43-6010 (clerical). The rates are 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 only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance costs.

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:

- Review initial notifications, initial reports, supplemental (change of notice) reports, variance requests, compliance extension requests, exemption requests, and other EPA requests for data, required to be submitted by industry.
- Review product record data submitted with triennial report, including identification information, product category, product calculations, the product-weighted reactivity, the weight fraction of all ingredients, product usage, product label.
- Audit facility records.

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.

14b. Agency Labor Cost

The 'burden' to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors. The only costs to the Agency are those costs associated with analysis of the reported information. The EPA's overall compliance and enforcement program includes such activities as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information. The average annual Agency burden and cost during the three years of the ICR is estimated to be 1,840 hours at a cost of \$102,000. See Tables 4 through 6: Average Annual EPA Burden and Cost – National Volatile Organic Compound (VOC) Emission Standards for Aerosol Coatings (40 CFR Part 59, Subpart E) (Renewal).

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

Managerial	\$76.92 (GS-13, Step 5, \$48.07 + 60%)
Technical	\$57.07 (GS-12, Step 1, \$35.67 + 60%)
Clerical	\$30.88 (GS-6, Step 3, \$19.30+ 60%)

These rates are from the Office of Personnel Management (OPM), 2024 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 Tables 4 through 6: Average Annual EPA Burden and Cost – National Volatile Organic Compound (VOC) Emission Standards for Aerosol Coatings (40 CFR Part 59, Subpart E) (Renewal).

14c. Agency Non-Labor Costs

There are no non-labor costs to the Agency associated with this information collection.

15) REASONS FOR CHANGE IN BURDEN

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

The increase in burden results from updating coating category product-weighted reactivity (PWR) limits, adding new compounds and reactivity factors, updating existing reactivity factors, revising the rule's default reactivity factor, amending thresholds for VOC regulated by the rule, amending reporting requirements to add electronic reporting, updating test methods to reflect more recent versions, adding a new compliance date, and making clarifying edits..

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.

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 well as other data, obtained from one-time or sporadic information collection requests often undergo complex analytical techniques; results of those activities are included in individual rulemaking dockets and are available at <https://www.regulations.gov/> for public review and printing.

17) DISPLAY OF EXPIRATION DATE

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

EPA will display the expiration date for OMB approval of the information collection.

18) CERTIFICATION STATEMENT

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

There are no exceptions to the topics of the certification statement.

Table 1: Annual Respondent Burden and Cost (Year 1) - National Volatile Organic Compound Emission Standards for Aerosol Coatings (40 CFR Part 59, Subpart E) (Renewal)	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C = A x B)	(D) Respondent s per year^a	(E) Technica l person- hours per year (E = C x D)	(F) Managemen t person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per year^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarization with rule requirements								
New sources	4	1	4	1	4	0.2	0.4	\$367.12
Existing sources ^c	1	1	1	46	46	2.3	4.6	\$4,221.83
B. Write Report								
Initial notification ^d	25	1	25	1	25	1	3	\$2,294.48
Change of Information in Notification ^e	4	1	4	15.7	62.7	3.13	6.27	\$5,751.48
Temporary Variance/Compliance Extension Application ^f	24	1	24	0.1	2.4	0.12	0.24	\$220.27
Respond to the written notification from EPA request for data ^g	60	1	60	10	600	30	60	\$55,067.40
Small Quantity Manufacturer Exemption Claim Notification	2	1	2	2	4	0.2	0.4	\$367.12
Exemption Annual Report	8	1	8	2	16	0.8	1.6	\$1,468.46
Notice of Certifying Entity to Maintain Records	4	1	4	3	12	0.6	1.2	\$1,101.35
Notice Rescinding Certification	1	1	1	1	1	0.05	0.1	\$91.78
Triennial Reports	5	1	5	0	\$0	\$0	\$0	\$0
C. Establish CEDRI account ^h	2	1	2	47	94	5	9	\$8,627.23
D. Submit reports in CEDRI ^h	2	1	2	0	0	\$0	\$0	\$0
Subtotal for Reporting Requirements						997		\$79,579
4. Recordkeeping requirements								
A. Familiarization with rule requirements								

B. Plan activities	-	-	-	-	-	-	-	-
C. Maintenance of records of batch information & calculations	120	1	120	47	5,640	282	564	\$517,633.56
D. Triennial Report	100	1	100	0	0	0	0	\$0
Subtotal for Recordkeeping Requirements						6,486		\$517,634
Total Labor Burden and Costs (rounded)ⁱ						7,480		\$597,000
Total Capital and O&M Cost (rounded)ⁱ								\$0
GRAND TOTAL (rounded)ⁱ								\$597,000

Assumptions:

^a We have assumed 46 existing respondents in year 1 and one additional new aerosol coating manufacturer each year.

^b This ICR uses the following labor rates: \$130.58 (managerial), \$80.22 (technical), and \$50.30 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2023 National Occupational Employment and Wage Estimates, for occupational groups 11-1021 (managerial), 51-8091 (technical), and 43-6010 (clerical). The rates represent the mean hourly wage, and have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c We have assumed that each existing source will re-familiarize with the requirements each year.

^d New sources file initial reports in their first year.

^e We assume that approximately one-third of respondents will have one incident per year that will require a change of information report).

^f We assume that 1.0 percent of new respondents will request a variance or extension on their compliance application.

^g We assume that 1.0 percent of new and existing sources per year will be required to respond to enforcement questions or other agency requests for information.

^h The includes the burden to establish an account and submit triennial reports in CEDRI for the first time and is a one-time activity for existing respondents following promulgation of the rule, and applies to 1 new respondent each year. The burden to submit reports is otherwise included in the burden under 3B.

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

Table 2: Annual Respondent Burden and Cost (Year 2) – National Volatile Organic Compound Emission Standards for Aerosol Coatings (40 CFR Part 59, Subpart E) (Renewal)

Burden item	(A) Person hours per occurrenc	(B) No. of occurrence s per	(C) Person hours per responden	(D) Respondent s per year ^a	(E) Technica l person- hours	(F) Managemen t person hours per	(G) Clerical person hours	(H) Total Cost Per year ^b
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	e	respondent per year	t per year (C = A x B)		per year (E = C x D)	year (E x 0.05)	per year (E x 0.1)	
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarization with rule requirements								
New sources	4	1	4	1	4	0.2	0.4	\$367.12
Existing sources ^c	1	1	1	47	47	2.4	4.7	\$4,313.61
B. Write Report								
Initial notification ^d	25	1	25	1	25	1	3	\$2,294.48
Change of Information in Notification ^e	4	1	4	15.7	62.7	3.13	6.27	\$5,751.48
Temporary Variance/Compliance Extension Application ^f	24	1	24	0.1	2.4	0.12	0.24	\$220.27
Respond to the written notification from EPA request for data ^g	60	1	60	10	600	30	60	\$55,067.40
Small Quantity Manufacturer Exemption Claim Notification	2	1	2	2	4	0.2	0.4	\$367.12
Exemption Annual Report	8	1	8	2	16	0.8	1.6	\$1,468.46
Notice of Certifying Entity to Maintain Records	4	1	4	3	12	0.6	1.2	\$1,101.35
Notice Rescinding Certification	1	1	1	1	1	0.05	0.1	\$91.78
Triennial Reports	5	1	5	0	0	0	0	\$0
C. Establish CEDRI account ^h	2	1	2	1	2	0.1	0.2	\$184
D. Submit reports in CEDRI ^h	2	1	2	0	0	0	0	\$0
Subtotal for Reporting Requirements						892		\$71,227
4. Recordkeeping requirements								
A. Familiarization with rule requirements								
B. Plan activities	-	-	-	-	-	-	-	-
C. Maintenance of records of batch information & calculations	120	1	120	48	5,760	288	576	\$528,647.04
E. Triennial Report	100	1	100	0	0	0	0	\$0

Subtotal for Recordkeeping Requirements		6,624	\$528,647
Total Labor Burden and Costs (rounded) ⁱ		7,520	\$600,000
Total Capital and O&M Cost (rounded) ⁱ			\$0
GRAND TOTAL (rounded) ⁱ			\$600,000

Assumptions:

^a We have assumed 46 existing respondents in year 1 and one additional new aerosol coating manufacturer each year.

^b This ICR uses the following labor rates: \$130.58 (managerial), \$80.22 (technical), and \$50.30 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2023 National Occupational Employment and Wage Estimates, for occupational groups 11-1021 (managerial), 51-8091 (technical), and 43-6010 (clerical). The rates represent the mean hourly wage, and have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c We have assumed that each existing source will re-familiarize with the requirements each year.

^d New sources file initial reports in their first year.

^e We assume that approximately one-third of respondents will have one incident per year that will require a change of information report).

^f We assume that 1.0 percent of new respondents will request a variance or extension on their compliance application.

^g We assume that 1.0 percent of new and existing sources per year will be required to respond to enforcement questions or other agency requests for information.

^h The includes the burden to establish an account and submit triennial reports in CEDRI for the first time and is a one-time activity for existing respondents following promulgation of the rule, and applies to 1 new respondent each year. The burden to submit reports is otherwise included in the burden under 3B.

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

Table 3: Annual Respondent Burden and Cost (Year 3) – National Volatile Organic Compound Emission Standards for Aerosol Coatings (40 CFR Part 59, Subpart E) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C = A x B)	(D) Respondent s per year ^a	(E) Technical person- hours per year (E = C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							

3. Reporting requirements								
A. Familiarization with rule requirements								
New sources	4	1	4	1	4	0.2	0.4	\$367.12
Existing sources ^c	1	1	1	48	48	2.4	4.8	\$4,405.39
B. Write Report								
Initial notification ^d	25	1	25	1	25	1	3	\$2,294.48
Change of Information in Notification ^e	4	1	4	15.7	62.7	3.13	6.27	\$5,751.48
Temporary Variance/Compliance Extension Application ^f	24	1	24	0.1	2.4	0.12	0.24	\$220.27
Respond to the written notification from EPA request for data ^g	60	1	60	10	600	30	60	\$55,067.40
Small Quantity Manufacturer Exemption Claim Notification	2	1	2	2	4	0.2	0.4	\$367.12
Exemption Annual Report	8	1	8	2	16	0.8	1.6	\$1,468.46
Notice of Certifying Entity to Maintain Records	4	1	4	3	12	0.6	1.2	\$1,101.35
Notice Rescinding Certification	1	1	1	1	1	0.05	0.1	\$91.78
Triennial Reports	5	1	5	49	245	12.25	24.5	\$22,485.86
C. Establish CEDRI account ^h	2	1	2	1	2	0.1	0.2	\$184
D. Submit reports in CEDRI ^h	2	1	2	49	98	4.90	9.80	\$8,994.34
Subtotal for Reporting Requirements						1,288		\$102,799
4. Recordkeeping requirements								
A. Familiarization with rule requirements								
B. Plan activities	-	-	-	-	-	-	-	-
C. Maintenance of records of batch information & calculations	120	1	120	49	5,880	294	588	\$539,660.52
D. Triennial Report	100	1	100	49	4,900	246	490	\$449,717.10
Subtotal for Recordkeeping Requirements						12,397		\$989,378
Total Labor Burden and Costs (rounded) ⁱ						13,700		\$1,092,000

Total Capital and O&M Cost (rounded) ⁱ		\$0
GRAND TOTAL (rounded) ⁱ		\$1,092,000

Assumptions:

^a We have assumed 46 existing respondents in year 1 and one additional new aerosol coating manufacturer each year.

^b This ICR uses the following labor rates: \$130.58 (managerial), \$80.22 (technical), and \$50.30 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2023 National Occupational Employment and Wage Estimates, for occupational groups 11-1021 (managerial), 51-8091 (technical), and 43-6010 (clerical). The rates represent the mean hourly wage, and have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c We have assumed that each existing source will re-familiarize with the requirements each year.

^d New sources file initial reports in their first year.

^e We assume that approximately one-third of respondents will have one incident per year that will require a change of information report).

^f We assume that 1.0 percent of new respondents will request a variance or extension on their compliance application.

^g We assume that 1.0 percent of new and existing sources per year will be required to respond to enforcement questions or other agency requests for information.

^h The includes the burden to establish an account and submit triennial reports in CEDRI for the first time and is a one-time activity for existing respondents following promulgation of the rule, and applies to 1 new respondent each year. The burden to submit reports is otherwise included in the burden under 3B.

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

Table 4: Annual EPA Burden and Cost (Year 1) - National Volatile Organic Compound Emission Standards for Aerosol Coatings (40 CFR Part 59, Subpart E) (Renewal)

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Number of occurrences per respondent per year ^a	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
1. Initial notification ^c	8	1	8	1	8	0.4	0.8	\$512.04
2. Change of Information in Notification ^d	4	1	4	15.7	62.7	3.13	6.27	\$4,011.02
3. Temporary Variance/Compliance Extension	16	1	16	0.1	1.6	0.08	0.16	\$102.41

Application ^e								
4. Written notification of data request ^f	40	1	40	10	400	20	40	\$25,602.24
5. Small Quantity Manufacturer Exemption Claim Notification	4	1	4	2	8	0.4	0.8	\$512.04
6. Exemption Annual Report	8	1	8	2	16	0.8	1.6	\$1,024.09
7. Notice of Certifying Entity to Maintain Records	2	1	2	3	6	0.3	0.6	\$384.03
8. Notice Rescinding Certification	2	1	2	1	2	0.1	0.2	\$128.01
9. Triennial Reports ^g								
A. Develop Database and Report Forms	300	1	300	1	300	15	30	\$19,201.68
B. Populate Database	12	1	12	0	0	0	0	\$0
C. QA/Review Data	600	1	600	1	600	30	60	\$38,403.36
TOTAL (rounded) ^h						1,610		\$89,900

Assumptions:

^a We have assumed 46 existing respondents in year 1 and one additional new aerosol coating manufacturer each year.

^b This ICR uses the following labor rates: \$76.91 (managerial), \$57.07 (technical), and \$30.88 (clerical). These rates are from the Office of Personnel Management (OPM), 2024 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 We have assumed that it will take eight hours for the Agency to review the initial report filed by new sources.

^d We have assumed that it will take four hours for the Agency to review to review the change of information reports.

^e We have assumed that it will take sixteen hours for the Agency to review requests for variances or extensions filed by new sources on their compliance application.

^f We assume that EPA will request additional data from 10 new and existing sources regarding enforcement questions or other agency requests for information, and that it will take 40 hours to review this data.

^g Each respondent is required to submit a report of formulations and VOC usage once every three years. We assume EPA will develop/update the database and reporting forms, collect the data submissions from all respondents, populate the database, and then perform a QA and review of the data.

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

Table 5: Annual EPA Burden and Cost (Year 2) - National Volatile Organic Compound Emission Standards for Aerosol Coatings (40 CFR Part 59, Subpart E) (Renewal)

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Number of occurrences per respondent per year ^a	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
1. Initial notification ^c	8	1	8	1	8	0.4	0.8	\$512.04
2. Change of Information in Notification ^d	4	1	4	15.7	62.7	3.1	6.3	\$4,011.02
3. Temporary Variance/Compliance Extension Application ^e	16	1	16	0.1	1.6	0.08	0.16	\$102.41
4. Written notification of data request ^f	40	1	40	10	400	20	40	\$25,602.24
5. Small Quantity Manufacturer Exemption Claim Notification	4	1	4	2	8	0.4	0.8	\$512.04
6. Exemption Annual Report	8	1	8	2	16	0.8	1.6	\$1,024.09
7. Notice of Certifying Entity to Maintain Records	2	1	2	3	6	0.3	0.6	\$384.03
8. Notice Rescinding Certification	2	1	2	1	2	0.1	0.2	\$128.01
9. Triennial Reports ^g								
A. Develop Database and Report Forms	300	1	300	1	300	15	30	\$19,201.68
B. Populate Database	12	1	12	0	0	0	0	\$0
C. QA/Review Data	600	1	600	1	600	30	60	\$38,403.36
TOTAL (rounded) ^h						1,610		\$89,900

Assumptions:

^a We have assumed 46 existing respondents in year 1 and one additional new aerosol coating manufacturer each year.

^b This ICR uses the following labor rates: \$76.91 (managerial), \$57.07 (technical), and \$30.88 (clerical). These rates are from the Office of Personnel Management (OPM), 2024 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 We have assumed that it will take eight hours for the Agency to review the initial report filed by new sources.

^d We have assumed that it will take four hours for the Agency to review to review the change of information reports.

^e We have assumed that it will take sixteen hours for the Agency to review requests for variances or extensions filed by new sources on their compliance application.

^f We assume that EPA will request additional data from 10 new and existing sources regarding enforcement questions or other agency requests for information, and that it will take 40 hours to review this data.

^g Each respondent is required to submit a report of formulations and VOC usage once every three years. We assume EPA will develop/update the database and reporting forms, collect the data submissions from all respondents, populate the database, and then perform a QA and review of the data.

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

Table 6: Annual EPA Burden and Cost (Year 3) - National Volatile Organic Compound Emission Standards for Aerosol Coatings (40 CFR Part 59, Subpart E) (Renewal)

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Number of occurrences per respondent per year ^a	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
1. Initial notification ^c	8	1	8	1	8	0.4	0.8	\$512.04
2. Change of Information in Notificatione ^d	4	1	4	15.7	62.7	3.1	6.3	\$4,011.02
3. Temporary Variance/Compliance Extension Application ^e	16	1	16	0.1	1.6	0.08	0.16	\$102.41
4. Written notification of data request ^f	40	1	40	10	400	20	40	\$25,602.24
5. Small Quantity Manufacturer Exemption Claim Notification	4	1	4	2	8	0.4	0.8	\$512.04
6. Exemption Annual Report	8	1	8	2	16	0.8	1.6	\$1,024.09
7. Notice of Certifying Entity to Maintain Records	2	1	2	3	6	0.3	0.6	\$384.03
8. Notice Rescinding Certification	2	1	2	1	2	0.1	0.2	\$128.01
5. Triennial Report ^g								
A. Develop Database and Report Forms	300	1	300	1	300	15	30	\$19,201.68
B. Populate Database	12	1	12	49	588	29	59	\$37,635.29
C. QA/Review Data	600	1	600	1	600	30	60	\$38,403.36
TOTAL (rounded)^h						2,290		\$128,000

Assumptions:

^a We have assumed 46 existing respondents in year 1 and one additional new aerosol coating manufacturer each year.

^b This ICR uses the following labor rates: \$76.91 (managerial), \$57.07 (technical), and \$30.88 (clerical). These rates are from the Office of Personnel Management (OPM), 2024 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 We have assumed that it will take eight hours for the Agency to review the initial report filed by new sources.

^d We have assumed that it will take four hours for the Agency to review to review the change of information reports.

^e We have assumed that it will take sixteen hours for the Agency to review requests for variances or extensions filed by new sources on their compliance application.

^f We assume that EPA will request additional data from 10 new and existing sources regarding enforcement questions or other agency requests for information, and that it will take 40 hours to review this data.

^g Each respondent is required to submit a report of formulations and VOC usage once every three years. We assume EPA will develop/update the database and reporting forms, collect the data submissions from all respondents, populate the database, and then perform a QA and review of the data.

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

Three Year Summary

Respondent Burden and Costs						
Year	Reporting Hours	Recordkeeping Hours	Total Hours	Reporting Costs	Recordkeeping Costs	Total Costs
Year 1	997	6,486	7,483	\$79,579	\$517,634	\$597,212
Year 2	892	6,624	7,516	\$71,227	\$528,647	\$599,874
Year 3	1,288	12,397	13,685	\$102,799	\$989,378	\$1,092,176
Total	3,178	25,507	28,685	\$253,604	\$2,035,658	\$2,289,262
3-Year Average	1,059	8,502	9,562	\$84,535	\$678,553	\$763,087

Agency Burden and Costs

Year	Labor Hours	Labor Costs
Year 1	1,610	\$89,900
Year 2	1,610	\$89,900
Year 3	2,290	\$128,000
Total	5,510	\$307,800
3-Year Average	1,840	\$103,000

Number of Respondents

	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	(D)	(E)
	(A)	(B)	(C)		
Year	Number of New Respondents ¹	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
1	1	46	0	0	47
2	1	47	0	0	48
3	1	48	0	0	49
Average	1	47	0	0	48

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

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=(BxC)+D
Initial notification	1	1	N/A	1
Change of Information in Notification	15.7	1	N/A	15.7
Temporary Variance/Compliance Extension Application	0.1	1	N/A	0.1
Respond to the written notification of data request	10	1	N/A	10
Small Quantity Manufacturer Exemption Claim Notification	2	1	N/A	2
Exemption Annual Report	2	1	N/A	2
Notice of Certifying Entity to Maintain Records	3	1	N/A	3
Notice Rescinding Certification	1	1	N/A	1
Triennial Reports	48	1	N/A	48
		Total (rounded)		83