

# U.S. Environmental Protection Agency

## Information Collection Request

**TITLE:** NSPS Review for Surface Coating of Plastic Parts for Business Machines (40 CFR part 60, subparts TTT and TTTa) (Amendments)

**OMB CONTROL NUMBER:** 2060-0162

**EPA ICR NUMBER:** 1093.15

### **ABSTRACT:**

This supporting statement addresses information collection activities that will be imposed by amendments to the New Source Performance Standards (NSPS) for Industrial Surface Coating of Plastic Parts for Business Machines, 40 CFR part 60, subpart TTT, as part of a periodic review required by the Clean Air Act (CAA). These amendments were proposed by notice published in the *Federal Register* on June 21, 2022 (87 FR 36796). CAA section 111(b)(1)(B) requires the EPA to “at least every 8 years review and, if appropriate, revise” new source performance standards. The original NSPS for the source category covered by subpart TTT were proposed on January 8, 1986, and promulgated on January 29, 1988. These regulations apply to sources (plant sites) whose NSPS “affected facilities” perform industrial surface coating on plastic parts for use in the manufacture of business machines. Each affected facility is a spray booth that applies prime coats, color coats, texture coats, or touch-up coats. Under the 1988 rule, the affected facilities subject to NSPS subpart TTT were those that commenced construction, reconstruction, or modification after the date of proposal (January 8, 1986). Through the rulemaking that is the subject of this ICR, the EPA is amending 40 CFR part 60 by establishing a new subpart TTTa, to apply only to affected facilities that commence construction, reconstruction, or modification after June 21, 2022 (the date of publication of the proposed rule in the *Federal Register*). As part of this same rulemaking, the EPA is also finalizing amendments to 40 CFR part 60, subpart TTT, such as to newly require electronic submission of the affected facilities’ periodic reports, and the amendments limit applicability of subpart TTT to affected facilities that commenced construction, reconstruction, or modification after January 8, 1986, but on or before June 21, 2022. This information is being collected to assure compliance with 40 CFR part 60, subpart TTT and new subpart TTTa.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. These notifications, reports, and records are essential in determining compliance and are required of all affected facilities subject to NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and shall retain the file for at least 2 years following the generation date of such maintenance reports and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. In the event that there is no such delegated authority, the EPA regional office can review them. All other reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the appropriate EPA regional office. The use of the term "Designated Administrator"

throughout this document refers to the U.S. EPA or a delegated authority such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

The "Affected Public" are owners or operators of facilities that perform industrial surface coating on plastic parts for use in the manufacture of business machines. The burden to the "Affected Public" may be found in Tables 1 through 4 of Attachment 1. The burden to the "Federal Government" is attributed entirely to work performed by federal employees or government contractors and may be found in Tables 5 through 8 of Attachment 1. There are approximately three plant sites with spray booths used to surface coat plastic parts for business machines. None of the three sites in the United States are owned by state, local, tribal or the federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond.

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

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

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

The total cost to the Designated Administrator during the 3 years of the ICR is estimated to average to \$0 per year as a result of the subject rule amendments, with equal cost in the first year (an estimated \$0). This burden includes labor costs for the EPA and state and local authorities to implement the requirements in the NSPS resulting from the subject rule amendments. This burden is shown in Tables 5 through 8 of Attachment 1.

The Office of Management and Budget (OMB) approved the currently active ICR without any "Terms of Clearance."

## **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.*

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

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

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

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

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

The amendments being finalized present the EPA's review of the requirements of 40 CFR part 60, subpart TTT pursuant to CAA section 111(b)(1)(B). Based on this statutory review, the EPA has determined that there are emission reduction techniques used in practice that achieve greater VOC emission reductions than those currently required by NSPS subpart TTT for surface coating operations. Pursuant to CAA section 111(a), the VOC emission standards under the new NSPS subpart TTTa apply only to facilities that begin construction, reconstruction, or modification after June 21, 2022 (the date of publication of the proposed rule in the Federal Register).

For sources that are already subject to the NSPS, we are finalizing certain revisions to subpart TTT that do not change the applicability of the NSPS or existing emission limits for VOC. Those revisions apply to

all affected facilities that commence construction, reconstruction, or modification after January 8, 1986 (i.e., all affected facilities under either subpart TTT or new subpart TTTa). With respect to affected facilities subject to subpart TTT, none of these clarifications would increase the cost of the rule or result in a change in VOC emissions.

## **2. 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.*

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

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

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

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

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

## **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.*

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As part of the amendments being finalized, respondents are required to submit notifications and semiannual reports through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI). The notification is an upload of their currently required notification in portable document format (PDF) file. No electronic template is necessary for the reporting required by the subject rulemaking. For purposes of this ICR, it is assumed that there will be only minimal burden associated with the requirement for respondents to submit the notifications and reports electronically.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI for this rule, see: <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.*

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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.*

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

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

#### **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.*

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Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and that emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

## **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).*

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These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

## **8. PUBLIC COMMENT AND CONSULTATIONS:**

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### **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.*

The EPA solicited public comment on the subject rule's information collection activities as part of the same notice in which the EPA proposed to revise the subject rule. That notice, "New Source Performance Standards Review for Industrial Surface Coating of Plastic Parts for Business Machines, Proposed Rule" was published in the *Federal Register* on June 21, 2022 (87 FR 36796). The comment period closed on August 22, 2022, by which time the EPA received no comment submissions. The docket for this rulemaking, Docket Number EPA-HQ-OAR-2021-0200, is accessible at <https://regulations.gov>.

### **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 3 years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the

Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities.

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

## **9. PAYMENTS OR GIFTS TO RESPONDENTS:**

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

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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.*

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Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B – Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

## **11. JUSTIFICATION FOR SENSITIVE QUESTIONS:**

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

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

## **12. RESPONDENT BURDEN HOURS AND LABOR COSTS:**

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

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.*
  - If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*
  - Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.*
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## 12a. RESPONDENTS/NAICS CODES

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

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

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

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

<sup>1</sup>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 3-year period of this ICR is three.

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

Total Annual Responses, In Year One
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(A) Information Collection Activity	(B) Number of Respondent s	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Become familiar with CEDRI for electronic filing of notifications and reports <sup>a</sup>	3	1	0	3
			Total	3
<b>Total Annual Responses, In Year Two</b>				
Become familiar with CEDRI for electronic filing of notifications and reports <sup>a</sup>	0	0	0	0
			Total	0
<b>Total Annual Responses, In Year Three</b>				
Become familiar with CEDRI for electronic filing of notifications and reports <sup>a</sup>	0	0	0	0
			Total	0

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

## 12b. INFORMATION REQUESTED

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

A source must make the following reports:

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

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

A source must keep the following records:

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

#### 12c. RESPONDENT ACTIVITIES

- Write the notifications and reports listed above.
- Enter information required to be recorded above.
- Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
- Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
- Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
- Train personnel to be able to respond to a collection of information.
- Transmit, or otherwise disclose the information.
- Familiarization with the CDX and CEDRI systems.

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

#### 12d. RESPONDENT BURDEN HOURS AND LABOR COSTS

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

This ICR uses the following labor rates:

Managerial	\$157.61 (\$75.05 + 110%)
Technical	\$123.95 (\$59.02 + 110%)
Clerical	\$62.52 (\$29.77 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2021, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

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

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

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

### **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.*

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The type of industry costs associated with the information collection activities in the subject standards are labor costs. There are no capital/startup or operation and maintenance costs.

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

The total annual capital/startup and operation and maintenance (O&M) costs associated with the rulemaking's requirements for electronic submission of reports are \$0. The cost calculations are detailed in Estimated Capital/Startup and 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.*

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##### **14a. Agency Activities**

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

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

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

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

##### **14b. Agency Burden and Labor Cost**

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

The average annual Agency cost during the 3 years of the ICR attributable to the subject amendments to the NSPS for Surface Coating of Plastic Parts for Business Machines is estimated to be \$828. This cost is based on the average hourly labor rate as follows:

Managerial	\$70.56 (GS-13, Step 5, \$44.10 + 60%)
Technical	\$52.37 (GS-12, Step 1, \$32.73 + 60%)
Clerical	\$28.34(GS-6, Step 3, \$17.17 + 60%)

These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based are shown in Tables 5 through 8 of Attachment 1.

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

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

#### **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.*

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In this ICR, the EPA estimates additional one-time respondent burden of 2 labor hours in the first year following promulgation of the subject amendments to provide for becoming familiar with the amendments to NSPS subpart TTT and becoming familiar with the CDX and CEDRI systems associated with electronic submission of reports. These amendments will not impact the burden on respondents in later years because they do not impose additional reporting or recordkeeping requirements. The total estimated respondent burden as currently identified in the OMB Inventory of Approved Burdens is based on 10 respondents (a larger number than the three respondents counted in this ICR). The downward adjustment in the number of respondents for this ICR, based on the EPA's most recent information, is reflected in Attachment 1 to this ICR Supporting Statement.

The only other change is related to the use of updated labor rates. This ICR uses labor rates from the most recent Bureau of Labor Statistics report (September 2021) to calculate respondent burden costs.

#### **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*

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*the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.*

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Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual and quarterly reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

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

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

#### **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.*

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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."*

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

#### **BURDEN STATEMENT**

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The annual public reporting and recordkeeping burden for this collection of information is estimated to average 2 hours per response. "Burden" means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either to or for a federal agency. This includes the time needed to: review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB

Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2021-0200. An electronic version of the public docket is available at <http://www.regulations.gov>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the EPA Docket Center, Room 3334, WJC West Building, 1301 Constitution Avenue, NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Public Reading Room is (202) 566-1744, and the telephone number for the EPA Docket Center is (202) 566-1742. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2021-0200 and OMB Control Number 2060-0162 in any correspondence.

#### **ATTACHMENTS**

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##### Attachment 1:

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

Excel workbook: [Business Machines NSPS final rule ICR Workbook 1093.15.xlsx](#).