

STANDARD FORM 83 SUPPORTING STATEMENT  
ICR NO. 2044.02 -- NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR  
POLLUTANTS: PLASTIC PARTS AND PRODUCTS SURFACE COATING  
(40 CFR PART 63, SUBPART PPPP)

U.S. Environmental Protection Agency  
Office of Air Quality Planning and Standards  
Research Triangle Park, North Carolina 27711

July 11, 2003

**PART A OF THE SUPPORTING STATEMENT:  
JUSTIFICATIONS**

**1. Identification of the Information Collection**

*(a) Title and Number of the Information Collected*

The title of this information collection request (ICR) is "Recordkeeping and Reporting Requirements for the National Emission Standards for Hazardous Air Pollutants (NESHAP): Plastic Parts and Products Surface Coating." This is a new ICR that has been assigned Environmental Protection Agency (EPA) ICR No. 2044.02.

*(b) Short characterization/abstract*

The final standards will regulate organic hazardous air pollutants (HAP) emissions resulting from the surface coating of plastic parts and products. The majority of organic HAP emissions from a facility engaged in plastic parts and products surface coating operations can be attributed to the application of the coating, drying, and curing. The organic HAP that are used in coatings as solvents and carriers are volatilized and emitted during the coating application process and while the coated parts are drying and curing in flash-off, drying, and curing areas.

Each owner or operator of a source affected by the final standards will be required to submit an initial notification that the source is subject to the standard. Each respondent would submit semiannual compliance reports. Additional records and notifications would depend on how the owner or operator chooses to comply with the standards. The owner or operator of a plastic parts and products surface coating operation that is subject to these final standards will be required to control organic HAP by either limiting the organic HAP content of every individual material used in the coating operations (compliant material

option), demonstrating that the source-wide organic HAP emissions meet the emission limit (emission rate without add-on controls option), or by using an emission capture and control system to demonstrate that the source-wide emissions meet the emission limitation (emission rate with add-on controls option).

The EPA expects that 20 percent of respondents would be able to comply by limiting the organic HAP content of every material used in the surface coating operations (compliant material option). These respondents would keep records of the materials used and their HAP content to demonstrate compliance. The EPA expects that 80 percent of respondents would comply by demonstrating that the source-wide HAP emissions meet the emission limitation (emission rate without add-on controls option or emission rate with add-on controls option). Respondents would monitor and record (typically in a spreadsheet) the monthly consumption of materials, and their HAP contents, and calculate the weighted-average organic HAP emissions over the most recent 12 months.

Nineteen of these existing facilities (about 10% of facilities) already have add-on controls and would use the emission rate with add-on controls option. They would keep the same records as respondents using the emission rate without add-on controls option.

In addition, respondents who choose to use an emission capture and control system would be required to develop a start-up, shutdown, and malfunction plan and a work practice plan and submit a notification for and conduct the initial add-on control device performance test. The EPA expects one new facility will start up per year and will comply by using the emission rate without add-on controls option.

All facilities would be required to submit notifications and reports to demonstrate compliance with the rule. These include

one-time reporting such as the notification of compliance status and semi-annual compliance reports.

## **2. Need for and Use of the Collection**

### *(a) Need/Authority for the Collection*

The EPA needs this information to ensure that HAP emissions are reduced in plastic parts and products surface coating operations. The EPA is required under section 112(d) of the Clean Air Act (CAA) to regulate emissions of the HAP listed in section 112(b) of the CAA. The major HAP identified by EPA as being emitted from these operations include toluene, methyl ethyl ketone (MEK), xylenes, and methyl isobutyl ketone (MIBK).

In the Administrator's judgment, HAP emissions from plastic parts and products surface coating operations cause or contribute significantly to air pollution that may reasonably be anticipated to endanger public health. Consequently, a NESHAP for this source category has been developed.

Section 114 of the CAA allows the Administrator to require inspections, monitoring, and entry into facilities to ensure compliance with a section 112 emission standard.

Section 114(a)(1) specifically states:

"The Administrator may require any person who owns or operates any emission source...who is subject to any requirement of this Act...on a one-time, periodic or continuous basis 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;
- (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."

Certain records and reports are necessary to enable the Administrator to identify sources subject to the standard and to ensure that the standard, which is based on a maximum achievable control technology (MACT), is being achieved.

*(b) Practical Utility/Users of Collected Information*

The information will be used by EPA to ensure that the requirements of the plastic parts and products surface coating NESHAP are implemented and are complied with on a continuous basis. Records and reports will be necessary to enable EPA to identify facilities that may not be in compliance with the emission limitations. Based on reported information, EPA would decide which plastic parts and products surface coating facilities should be inspected and what records or processes should be inspected. The records would indicate to EPA whether owners and operators are correctly performing the required calculations to demonstrate compliance. If owners or operators use an add-on control device, the records would also indicate whether the add-on control device is being properly operated and maintained.

To minimize reporting burdens, much of the information EPA would need to determine compliance would be recorded and retained on-site at the facility. Such information would be reviewed by enforcement personnel during an inspection and would not need to be routinely reported to EPA. In addition, in many cases EPA has selected parameters for monitoring that are readily available or are already monitored by the industry for other purposes.

**3. Nonduplication, Consultations, and Other Collection Criteria**

(a) *Nonduplication*

Facilities that are subject to the NSPS for Surface Coating of Plastic Parts for Business Machines (40 CFR part 60, subpart TTT) will be subject to the requirements of both the subpart TTT NSPS and this NESHAP, but they will not be subject to conflicting requirements between the two standards. Subpart TTT applies to sources constructed after January 8, 1986 that coat plastic parts for use in the manufacture of business machines. Subpart TTT establishes volatile organic compound (VOC) emission limitations for specific types of coatings (e.g., prime coats, color coats, texture coats), whereas this NESHAP will regulate HAP emissions.

The burden requested for this NESHAP requires similar information as subpart TTT NSPS. Facilities complying with the NSPS are required to calculate the mass of VOC emitted per volume of coating solids applied for each type of coating used (i.e., prime coats, color coats, texture coats) on a monthly basis. To do this, facilities must determine the composition of each coating either by testing or by using information provided by the supplier or manufacturer. Similar information is required by this NESHAP. Thus, facilities that are complying with both standards will be able to streamline their testing and recordkeeping requirements. In addition, both the NSPS and this NESHAP require reporting on a semiannual basis. Facilities can submit a single report with the necessary information to demonstrate compliance with both standards.

In addition, some facilities that are subject to the Aerospace Manufacturing and Rework Facilities NESHAP (40 CFR 63, subpart GG), the Shipbuilding and Repair NESHAP (40 CFR 63, subpart II), the Miscellaneous Metal Parts and Products NESHAP (40 CFR 63, subpart MMMM), or the upcoming Automobile and Light Duty Truck NESHAP (40 CFR 63, subpart IIII) may be subject to the

requirements of one or more of these other NESHAP and this NESHAP.

However, the rule includes several alternative provisions so that a facility subject to more than one NESHAP only has to fulfil the monitoring, recordkeeping, and reporting requirements of a single rule. These provisions include compliance with a single NESHAP for all surface coating activity; compliance with a single emission limit representing the predominant surface coating activity (i.e., greater than 90 percent); or compliance with a composite emission limit reflecting the different limits to which a source is subject. We predict that only a minority of sources will need to utilize one of these options because of overlap among applicable NESHAP. These options were specifically designed so that the burden for these facilities will not be different from those that are subject to only this NESHAP.

If a facility decides, instead, to comply with multiple NESHAP separately, the burden requested for this NESHAP requires similar information as for these other NESHAP. Facilities complying with another NESHAP will be able to use coating composition information required by this NESHAP. Therefore, facilities that are complying with more than one NESHAP will be able to streamline their gathering of coating data. Furthermore, all these NESHAP require semiannual reporting so that facilities can submit one report to demonstrate compliance with more than one standard.

Certain reports required by State or local agencies may duplicate information required by the standards. In such cases, a copy of the report submitted to the State or local agency may be sent to the Administrator in lieu of the report required by the standards.

*(b) Public Notice Required Prior to ICR Submission to the Office of Management and Budget*

The EPA has solicited public comments on the need for this information, the accuracy of the burden estimates, and any suggested methods for minimizing respondent burden from this rule.

*(c) Consultations*

The EPA has minimized the impact of this rule on small entities throughout the rule development process. Representatives of small entities have participated in stakeholder meetings held during the last five years. Further, EPA is applying the minimum level of control to affected sources allowed by the Clean Air Act. The rule includes compliance options that give small entities flexibility in choosing the most cost effective and least burdensome alternative for their operation. For example, a facility could purchase and use low-HAP coatings (i.e., pollution prevention) instead of using add-on capture and control systems. This method of compliance can be demonstrated with minimum burden by using purchase and usage records. No testing of materials would be required, as the facility owner could show that the coatings meet the emission limits by providing formulation data supplied by the manufacturer, which is typically already available to facilities.

*(d) Effects of Less Frequent Collection*

Failure to require periodic reporting of HAP emissions will prevent the Administrator from determining if a source is in compliance with the NESHAP. If the reports and data parameters were collected less frequently, EPA would not be able to identify potential compliance problems in a timely fashion. Semiannual reports are required so that EPA can ensure that timely corrective action is being taken.



Respondents who choose to use an emission capture and control system would submit a control system performance test report, including operating limits for enclosure volumetric flowrate and enclosure opening pressure drop across the enclosure openings. The operating limits ensure that the system maintains a constant capture efficiency. Respondents would also be required to establish operating limits, monitor, and keep records of specific operating parameters for each control device to ensure the control device continues to be well-operated to achieve HAP reduction, and report any deviations from these operating parameters. If this information were collected less frequently, the main consequence could be decreased performance of emission control measures due to lack of regular inspection, which could result in increased HAP emissions.

*(e) General Guidelines*

This information collection meets the Office of Management and Budget's (OMB) general guidelines for information collections and therefore does not require justification for any deviation from OMB's general guidelines.

*(f) Confidentiality*

All information submitted to EPA for which a claim of confidentiality is made will be safeguarded according to EPA policies in 40 CFR part 2, subpart B, Confidentiality of Business Information.

*(g) Sensitive questions*

This information collection does not request any information concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private.

**4. The Respondents and the Information Requested**

(a) *Respondents/North American Industrial Classification System and Standard Industrial Classification Codes*

The final source category definition includes facilities that apply coatings to plastic parts and products. In general, facilities that coat plastic parts and products are covered under the North American Industrial Classification System (NAICS) codes listed in the following table.

REGULATED CATEGORIES AND ENTITIES

Category	NAICS	Examples of potentially regulated entities
Industrial	337214	Office furniture, except wood
	32614, 32615	Plastic foam products (e.g. pool floats, wrestling mats, life jackets)
	326199	Plastic products not elsewhere classified (e.g., name plates, coin holders, storage boxes, license plate housings, cosmetic caps, cup holders)
	333313	Office machines
	33422	Radio and television broadcasting and communications equipment (e.g., cellular telephones)
	336399	Motor vehicle parts and accessories
	336999	Transportation equipment not elsewhere classified (e.g., snowmobile hoods, running boards, tractor body panels, personal watercraft parts)
	339111, 339112	Medical equipment and supplies
	33992	Sporting and athletic goods
	33995	Signs and advertising specialties

Category	NAICS	Examples of potentially regulated entities
	339999	Manufacturing industries not elsewhere classified (e.g., bezels, consoles, panels, lenses)
Federal, State, and Local Governments		Government owned or operated facilities that perform plastic parts and products surface coating

(b) *Information Requested*

(i) Data items, including recordkeeping requirements:

Test report. Facilities using an add-on control device will be required to establish the operating range for monitored parameters; prepare a start-up, shutdown, and malfunction plan; and submit a notification of performance tests and an initial add-on control device performance test report.

Notification reports. The owner or operator of each facility will be required to submit an initial notification report that the source is subject to the standard. The owner or operator of each new facility would be required to submit notifications of intent to construct, construction start date, anticipated start-up date, and actual start-up date. All new and existing facilities will be required to submit a notification of compliance status including their initial compliance demonstration.

Compliance reports. The owner or operator of each facility will be required to submit semiannual compliance reports. Sources with deviations would be required to provide additional detail in the semi-annual compliance report.

Work practice plan. Facilities using an add-on control device would be required to develop a work practice plan. The plan would include site-specific requirements such as storing coatings in closed containers, transferring materials in closed systems, minimizing spills, and using closed mixing vessels.

Records and Calculations. Facilities complying with the emission limitations using the compliant material option or the emission rate with or without add-on controls) option will develop a recordkeeping system (typically a spreadsheet) and enter information into the system. The EPA expects that to determine HAP content, facilities will have manufacturer's formulation data for materials used and would obtain usage data from purchasing records. Facilities will track the materials used, review the manufacturer's formulation data, and enter information from the formulation data into the spreadsheet. In addition, the facilities using the emission rate (with or without add-on controls) option will set up, run, and check the spreadsheet calculations used to determine the source-wide emission rate.

(ii) Respondent activities: To assemble, submit, and store the data items necessary to submit the reports, an entity would typically develop a spreadsheet system for keeping records. The EPA expects that entities will gather information that is already available.

## **5. The Information Collected—Agency Activities, Collection Methodology, and Information Management**

### *(a) Agency Activities*

A list of Agency activities is provided in tables 5 through 7 (see attachment 3).

### *(b) Collection Methodology and Management*

This collection of information does not require the use of automated collection techniques because of the relatively small number of respondents affected.

### *(c) Small Entity Flexibility*

The EPA does not expect the rule to adversely affect small entities. In developing this regulation, EPA has provided the maximum degree of flexibility to minimize impacts on small businesses by providing different compliance options, including options that require a minimum amount of recordkeeping and reporting requirements.

The EPA has determined that 50 of the 131 firms, or 38 percent of the total, affected by the rule may be small. While the number of small firms appears to be a large proportion of the total number of affected firms, the small firms only experience 11 percent of the total national compliance cost of \$13 million. Of the 50 affected small firms, only three firms are estimated to have compliance costs that exceed one percent of their revenues. In addition, only one small firm is estimated to have compliance costs that exceed three percent of its revenues, and the amount of the exceedance is only 0.02 percent. Finally, while there is a difference between the median compliance cost-to-sales estimates for the affected small and large firms (0.09 percent compared to 0.01 percent for the large firms), no adverse economic impacts are expected for either small or large firms affected by the rule. Therefore, the affected small firms are not disproportionately affected by this rule as compared to the affected large firms.

Although this rule will not have a significant economic impact on a substantial number of small entities, EPA has tried to reduce the impact of this rule on small entities throughout the rule development process. Representatives of small entities have participated in stakeholder meetings held during the rule development. Further, the Agency is applying the minimum level of control to affected sources allowed by the CAA. The rule offers compliance options which give small entities flexibility in choosing the most cost effective and least burdensome alternative for their operation. For example, a facility could

purchase and use low-HAP coatings (i.e., pollution prevention) instead of using add-on capture and control systems. This method of compliance can be demonstrated with minimum burden by using purchase and usage records. No testing of materials would be required, as the facility owner could show that their coatings meet the emission limits by providing formulation data supplied by the manufacturer.

For purposes of assessing the impacts of the plastic parts and products surface coating rule on small entities, small entity is defined as: (1) a small business that has less than 500 or 1,000 employees, depending on the size definition for the affected Standard Industrial Classification (SIC) Code; (2) a small governmental jurisdiction that is a government of a city, county, town, school district or special district with a population of less than 50,000; and (3) a small organization that is any not-for-profit enterprise which is independently owned and operated and is not dominant in its field. It should be noted that companies classified under 24 different Standard Industrial Classification (SIC) codes are affected by the rule, and the small business definition applied to each industry by SIC code is listed in the Small Business Administration (SBA) size standards (13 CFR 121). For more information on size standards for particular industries, refer to the economic impact analysis memorandum in the docket (Docket No. A-99-12).

Small entities that will be subject to the regulation will not be systematically impacted more than larger entities. Although the recordkeeping requirements are the same for small businesses and large businesses, EPA considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small businesses.

*(d) Collection Schedule*

The EPA expects one new facility to be constructed for each of the first 3 years. The EPA assumes that because compliance is not required until year 3 for existing facilities, existing facilities will wait until year 3 to begin complying with the requirements.

Year 1 for new and existing facilities includes the one-time activity of reading the regulation. It also includes submitting the initial notification for existing sources that the source is subject to the standard.

New major sources would submit the following one-time only notifications: intent to construct, start of construction date, anticipated start-up date, and actual start-up date. These notifications generally would be submitted within 60 days of the activity.

In year 1, new facilities will begin training their personnel regarding the use of low-HAP and compliant coatings and tracking their usage. Existing facilities would train personnel in year 3. Also in year 1, new facilities would begin complying with the organic HAP emission limit requirements, developing spreadsheets, and entering data as described in section 4(b). For the burden estimates, it is assumed that new facilities will comply by using the emission rate without add-on controls option.

In year 2, the new source from year 1 will submit the notification of compliance status and one semiannual report and the new facility from year 2 would submit all initial notifications. There are no activities in year 2 for existing sources.

In year 3, the new source from year 1 will submit two semiannual reports. The new source from year 2 will submit the notification of compliance status and one semiannual report. The new source from year 3 will submit all initial notifications. In year 3, all existing facilities will plan their compliance method and develop a recordkeeping system including spreadsheets.

Facilities with add-on controls would develop a startup, shutdown, malfunction plan and a work practice plan; submit notification of intent to conduct the performance test; and conduct the initial add-on control device performance test.

## **6. Estimating the Burden and Cost of the Collection**

### *(a) Estimating Respondent Burden*

The EPA expects this regulation to affect 202 existing and 3 new plastic parts and products surface coating facilities over the first 3 years. Tables 1 through 3 present an itemized breakdown of the reporting and recordkeeping requirements for the respondents affected by these standards.

### *(b) Estimating Respondent Costs*

The information collection activities for sources subject to these requirements are presented in tables 1 through 3. The total cost for each respondent activity includes labor costs, capital/start-up costs, and operating and maintenance (O&M) costs.

(i) Estimating Labor Costs. Labor rates, on a per-hour basis, are taken from the Bureau of Labor Statistics (BLS) web site (<http://stats.bls.gov/ecthome.htm>) as posted for March 2000. The base labor rates are \$27.38 for technical, \$41.64 for management personnel, \$17.31 for clerical personnel. The labor rates include fringe benefits, including paid leave, insurance, etc. The labor rates are also adjusted by an overhead and profit rate of 167 percent. Therefore, the total loaded wage rates are calculated by the following equation:

$$\text{base labor rate} \times 1.67 = \text{loaded wage rate}$$



Given the cost overhead adjustments, the final total loaded wage rates are \$45.74 for technical, \$69.54 for management personnel, and \$28.91 for clerical personnel.

(ii) Estimating Capital/Start-up Costs. The EPA does not expect any capital/start-up costs for facilities to add controls. There are 19 existing facilities with add-on controls that will comply with the emission rate with add-on controls option. However, EPA does not anticipate that any other facilities will use add-on controls to comply with this subpart. The 19 existing facilities will, however, incur a capital cost of \$7,000 to purchase enclosure monitoring equipment. This cost is based on a vendor estimate. The EPA assumes all other required monitoring devices will already exist at these facilities. Monitors for the required control device operating parameters are typically purchased with the control device and would already be in use at existing facilities.

For the purpose of this subpart, EPA assumes that each owner or operator owns a computer with spreadsheet software.

(iii) Total O&M and Purchase of Service Costs. The total annual operating and maintenance costs were calculated based on estimated photocopying and postage costs for the various reports. An estimate of \$7.50 per report was applied to the numbers of reports submitted each year.

*(c) Estimating Agency Burden and Cost.*

Because ICRs are an incidental part of standards development, no costs can be attributed to the development of ICRs. Because reporting and recordkeeping requirements on the part of the respondents are required under section 112 of the CAA, no additional operational costs will be incurred by the Federal Government. Examination of records to be maintained by the respondents would occur incidentally as part of the periodic inspection of sources that is part of EPA's overall compliance

and enforcement program and, therefore, cannot be attributable to ICRs.

A list of Agency activities that are attributable to this ICR is provided in tables 5 through 7 (see attachment 3).

Labor rates for the Federal employees are based on the estimated hourly rates of \$39.62 for technical personnel (GS-12, Step 5); \$57.92 for management personnel (GS-15, Step 5); and \$29.63 for clerical personnel (GS-7, Step 5). These values include a 1.67 multiplier to account for overhead and fringe benefit costs.

*(d) Estimating the Respondent Universe and Total Burden Costs.*

The total number of respondents is also referred to as the respondent universe. The respondent universe for this ICR is based on EPA's plastic parts and products surface coating database. The database was populated using responses from a section 114 survey issued in 1998. The industry burden is calculated for 202 existing facilities. Based on U.S. economic census data for representative SIC codes, EPA expects one new facility will be constructed each year. The EPA expects that each new facility will comply by using the emission rate without add-on controls option, because this option is more flexible than the compliant material option and because add-on controls are generally not applicable to all types of facilities in this source category.

Each existing facility will choose to comply by using one of three options: compliant material option, emission rate without add-on controls option, and emission rate with add-on controls option. Of the 202 existing facilities, EPA expects 20 percent (40 facilities) to use the less burdensome compliant material option because some of the existing facilities are small, use fewer materials, and will be able to use only low- or non-HAP

materials. The remaining 162 existing facilities will choose the emission rate (with or without add-on controls) option and will develop a recordkeeping system (typically a spreadsheet) to track material usages and calculate emissions. Of the 162 facilities using the emission rate (with or without add-on controls) option, EPA expects 19 to use the emission rate with add-on controls option because 19 of the existing facilities already have controls in place. The remaining 143 facilities will use the emission rate without add-on controls options to comply. Agency personnel are expected to observe the performance tests at half the existing facilities with add-on control devices (9 facilities out of 19). No costs are associated with repeat performance tests because facilities will not "fail" the test since they are simply setting a typical control device and capture efficiency to use in compliance calculations.

(e) *Bottom Line Burden Hours and Cost Tables.*

(i) The Respondent Tally. A breakdown for each of the collection, reporting, and recordkeeping activities required by the regulation is presented in tables 1 through 3. The estimate of total annual hours requested from the respondents is based on the assumptions outlined in section 6(d) of this supporting statement. The EPA estimated the respondent burden by totaling the hours for the first 3 years after the implementation of the regulation for technical, managerial, and clerical staff at the facility. This total was then divided by 3 to arrive at the average annualized burden in the first 3 years following promulgation (see table 4). A similar approach was taken for estimating average annual labor and non-labor costs. For the first 3 years after the implementation of the regulation, EPA estimates that industry would expend an average of 42,533 hours annually at a labor cost of \$1,927,249 per year to meet the monitoring, recordkeeping, and reporting requirements. The average annual capital cost is expected to be \$44,333. The

average annual operation and maintenance cost is expected to be \$655 (see table 4).

(ii) The Agency Tally. The bottom line agency burden hours and costs, presented in tables 5 through 7, are calculated by totaling the hours per year for technical, managerial, and clerical staff, and by totaling the cost column. Table 8 (attachment 3) summarizes the agency burden for each of the first 3 years and calculates the average annual burden by dividing the 3 year total by 3. The estimated average annual burden, over the first 3 years, for the Agency would be 1,432 hours at a cost of \$57,956 per year.

(iii) Variations in the Annual Bottom Line.

Calculating the average annual costs underestimates costs in a typical year for a NESHAP. Calculating each year individually provides a more accurate account of how facilities will be affected in the first 3 years following promulgation.

During years 1 and 2, there is little burden for existing facilities because existing facilities are not required to begin compliance until year 3. Therefore, the year 3 burden for industry and the government is much higher than years 1 and 2.

(f) *Reasons for Change in Burden*

This is a new collection and there is no change in burden.

(g) *Burden Statement*

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 210 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information,

processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 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 No. OAR-2002-0074, which is available for public viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air Docket is (202) 566-1742. An electronic version of the public docket is available through EPA Dockets (EDOCKET) at <http://www.epa.gov/edocket>. Use EDOCKET to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number identified above. 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 Office for EPA. Please include the EPA Docket ID No. OAR-  
2002-0074

## Attachment 1

### Source Data and Information Requirements

Requirement	40 CFR part 63
RECORDKEEPING	
5-year retention of records	63.4531(b)
Copy of each notification and report as submitted and associated documentation	63.4530(a)
Recordkeeping relevant to start-up, shutdown, and malfunction periods and continuous monitoring system	63.6(e)(3)(iii) through (v)
Copy of information, such as manufacturer's formulation data, used in calculations	63.4530(b), (e), (f), (g)
Copy of all emission rate calculations	63.4530(c)
Record of all coatings used during each compliance period	63.4530(d)
Record of waste materials shipped off-site to TSDF	63.4530(h)
Records of continuous compliance with operating limits for add-on control	63.4530(k)
Records of deviations	63.4530(j)
General recordkeeping	63.10(b)(1)
REPORTING	
Initial notification for existing sources	63.4510(b)
Notification of intent to construct	63.4510(a)
Notification of start construction	63.4510(a)
Notification of anticipated start-up date	63.4510(a)

Requirement	40 CFR part 63
Notification of actual start-up date	63.4510(a)
Notification of compliance status	63.4510(c)
Notification of performance test	63.4510(a)
Semi-annual compliance report	63.4520(a)
Start-up, shutdown, and malfunction plan	63.6(e)(3)



## Attachment 2

### TABLES 1, 2, 3, and 4

- Table 1: Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for National Emission Standards for Hazardous Air Pollutants for Plastic Parts and Products Surface Coating--40 CFR Part 63, Subpart PPPP - Year 1
- Table 2: Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for National Emission Standards for Hazardous Air Pollutants for Plastic Parts and Products Surface Coating--40 CFR Part 63, Subpart PPPP - Year 2
- Table 3: Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for National Emission Standards for Hazardous Air Pollutants for Plastic Parts and Products Surface Coating--40 CFR Part 63, Subpart PPPP - Year 3
- Table 4: Summary of Respondent Burden and Cost of Recordkeeping and Reporting Requirements for National Emission Standards for Hazardous Air Pollutants for Plastic Parts and Products Surface Coating--40 CFR Part 63, Subpart PPPP - Years 1 through 3 and Average

**Table 1. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Plastic Parts and Products Surface Coating NESHAP--Subpart PPPP-Year 1 - First Year After Promulgation**

Burden item	Plant Hours per occurrence (A)	Number of occurrences per plant per year (B)	Plant hours per occurrence per year (C = A X B)	Number of plants per year (D)	Technical personnel hours per year (E=CxD)	Management personnel hours per year (F=Ex0.05)	Clerical personnel hours year (G=Ex0.1)	Total Labor Costs (\$) <sup>b</sup>	Total Non-Labor Costs	Footnotes
1. Applications	n/a	0	0	0	0	0	0	0		a
2. Survey and Studies	n/a	0	0	0	0	0	0	0		a
3. Acquire and install recordkeeping technology and systems	Included in 5.A	0	0	0	0	0	0	0		
4. Read and understand rule requirements	30	1	30	203	6090	304.5	609	317,338		b
5. Required activities for all sources, with or without add-on controls					0	0	0	0		
A. Develop recordkeeping system (including emission rate calculation spreadsheets)					0	0	0	0		
1) Develop system, if using compliant materials option	25	0	0	0	0	0	0	0		
2) Develop system, if using the emission rate option, with or without add-on controls	60	1	60	1	60	3	6	3,126		c, k
B. Enter information into recordkeeping system					0	0	0	0		
1) Enter information, if using compliant materials option	25	0	0	0	0	0	0	0		
2) Enter information, if using emission rate option, with or without add-on controls	40	1	40	1	40	2	4	2,084		c
6. Additional required activities for sources with add-on control devices					0	0	0	0		d
A. Initial add-on control device and capture system performance tests and report	500	0	0	0	0	0	0	0		
B. Establish operating parameters	Included in 6A		0		0	0	0	0		
C. Prepare startup, shutdown, and malfunction plan and a work practice plan	80	0	0	0	0	0	0	0		
D. Continuous parameter monitoring					0	0	0	0		

**Table 1. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Plastic Parts and Products Surface Coating NESHAP--Subpart PPPP-Year 1 - First Year After Promulgation (Continued)**

Burden item	Plant Hours per occurrence (A)	Number of occurrences per plant per year (B)	Plant hours per occurrence per year (C = A X B)	Number of plants per year (D)	Technical personnel hours per year (E=CxD)	Management personnel hours per year (F=Ex0.05)	Clerical personnel hours year (G=Ex0.1)	Total Labor Costs (\$) <sup>h</sup>	Total Non-Labor Costs	Footnotes
1) Initial costs	0	1	0	0	0	0	0	0		
2) Annual costs	10	1	0	0	0	0	0	0		a
7. Create Information	Included in 5B				0	0	0	0		
8. Gather information	Included in 5B				0	0	0	0		
9. Notification requirements					0	0	0	0		
A. Initial notification that existing sources are subject to the standard	2	1	2	202	404	20.2	40	21,052		e
B. Notifications for new major sources					0	0	0	0		
1) Notification of intent to construct a new major source and application for approval of construction	15	1	15	1	15	0.75	2	782		f
2) Notification of start of construction	2	1	2	1	2	0.1	0	104		f
3) Notification of anticipated startup date	2	1	2	1	2	0.1	0	104		f
4) Notification of actual startup date	2	1	2	1	2	0.1	0	104		f
C. Request for compliance extension	8	1	8	0	0	0	0	0		
D. Notification of special compliance requirements	n/a	0	0	0	0	0	0	0		a
E. Notification of performance tests	2	0	0	0	0	0	0	0		
F. Notification of compliance status	8	0	0	0	0	0	0	0		
10. Recordkeeping requirements					0	0	0	0		
A. Read instructions	Included in 4.		0		0	0	0	0		
B. Plan and develop record system	Included in 5A.		0		0	0	0	0		
C. Record information	Included in 5B.		0		0	0	0	0		

**Table 1. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Plastic Parts and Products Surface Coating NESHAP--Subpart PPPP-Year 1 - First Year After Promulgation (Continued)**

Burden item	Plant Hours per occurrence (A)	Number of occurrences per plant per year (B)	Plant hours per occurrence per year (C = A X B)	Number of plants per year (D)	Technical personnel hours per year (E=CxD)	Management personnel hours per year (F=Ex0.05)	Clerical personnel hours year (G=Ex0.1)	Total Labor Costs (\$) <sup>h</sup>	Total Non-Labor Costs	Footnotes
D. Records for area sources not subject to the standard	n/a	0	0	0	0	0	0	0		
11. Reporting requirements					0	0	0	0	1,545	l
A. Semiannual compliance reports for all sources	8	0	0	0	0	0	0	0		j
B. Additional reports for sources with add-on control devices			0		0	0	0	0		
1) Control device and capture system performance test report	Included in 6A.		0		0	0	0	0		
2) Operating range for monitored parameters	Included in 6A.		0		0	0	0	0		
3) Startup, shutdown, malfunction reports	8	0	0	0	0	0	0	0		
12. Time to train personnel	400	1	400	1	400	20	40	20,843		g
13. Time for audits	n/a	0	0	0	0	0	0	0		a
<b>TOTAL NON-LABOR COST</b>									1,545	
<b>TOTAL BURDEN (SALARY AND NON-LABOR COSTS)</b>								367,082		
<b>TOTAL ANNUAL HOURS</b>					7,015	351	702	8,067		

a - n/a means that these activities are not applicable for this NESHAP in the three years after promulgation, although they will occur in subsequent years.

b - this is a one-time only cost.

c - assume that new sources will comply using the weighted average option (one new source per year).

d - it is assumed that only existing sources that already have add-on controls will use add-on controls. Therefore, this activity will occur for those sources in year 3.

e - based on the plastic parts database which estimates 202 existing affected sources.

f - these activities apply only to new sources. Projection of one new source per year.

g - based on an average number of coating employees per facility of 50 each receiving 8 hours of training.

h - labor costs are based on the loaded hourly wage rates of 45.74 for technical, 69.54 for managerial, and 28.91 for clerical.

j - the hours per occurrence is an average value based on the assumption that most facilities will not have a deviation and will spend less than 8 hours.

Also, most facilities do not have add-on controls and will not have to report parameter monitoring.

k - The hours per occurrence is an average value. Some facilities will need less time because they will have extensive usage tracking systems already in place.

Other facilities may need more time if they are using different compliance options for different areas of the facility because the usage tracking will be more involved.

l - operation and maintenance costs include photocopying and postage costs. Approximately \$7.50 per report to copy and send.

**Table 2. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Plastic Parts and Products Surface Coating NESHAP--Subpart PPPP-Year 2 - Second Year After Promulgation**

Burden item	Plant Hours per occurrence (A)	Number of occurrences per plant per year (B)	Plant hours per occurrence per year (C = A X B)	Number of plants per year (D)	Technical personnel hours per year (E=CxD)	Management personnel hours per year (F=Ex0.05)	Clerical personnel hours year (G=Ex0.1)	Total Labor Costs (\$)g	Total Non-Labor Costs	Footnotes
1. Applications	n/a	0	0	0	0	0	0	0		a
2. Survey and Studies	n/a	0	0	0	0	0	0	0		a
3. Acquire and install recordkeeping technology and systems	n/a	0	0	0	0	0	0	0		
4. Read and understand rule requirements	30	1	30	1	30	1.5	3	1,563		b
5. Required activities for all sources, with or without add-on controls			0		0	0	0	0		
A. Develop recordkeeping system (including emission rate calculation spreadsheets)			0		0	0	0	0		
1) Develop system, if using compliant materials option	25	0	0	0	0	0	0	0		
2) Develop system, if using the emission rate option, with or without add-on controls	60	1	60	1	60	3	6	3,126		c, k
B. Enter information into recordkeeping system			0		0	0	0	0		
1) Enter information, if using compliant materials option	25	0	0	0	0	0	0	0		
2) Enter information, if using emission rate option, with or without add-on controls	40	1	40	2	80	4	8	4,169		c
6. Additional required activities for sources with add-on control devices			0		0	0	0	0		d
A. Initial add-on control device and capture system performance tests and report	500	0	0	0	0	0	0	0		
B. Establish operating parameters	Included in 6A	0	0	0	0	0	0	0		
C. Prepare startup, shutdown, and malfunction plan and a work practice plan	80	0	0	0	0	0	0	0		

**Table 2. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Plastic Parts and Products Surface Coating NESHAP--Subpart PPPP-Year 2 - Second Year After Promulgation (Continued)**

Burden item	Plant Hours per occurrence (A)	Number of occurrences per plant per year (B)	Plant hours per occurrence per year (C = A X B)	Number of plants per year (D)	Technical personnel hours per year (E=CxD)	Management personnel hours per year (F=Ex0.05)	Clerical personnel hours year (G=Ex0.1)	Total Labor Costs (\$) <sup>g</sup>	Total Non-Labor Costs	Footnotes
D. Continuous parameter monitoring			0		0	0	0	0		
1) Initial costs	0	1	0	0	0	0	0	0		
2) Annual costs	10	1	0	0	0	0	0	0		a
7. Create Information	Included in 5B	0	0	0	0	0	0	0		
8. Gather information	Included in 5B	0	0	0	0	0	0	0		
9. Notification requirements			0		0	0	0	0		
A. Initial notification that existing sources are subject to the standard	2	0	0	0	0	0	0	0		
B. Notifications for new major sources			0		0	0	0	0		
1) Notification of intent to construct a new major source and application for approval of construction	15	1	15	1	15	0.75	2	782		e
2) Notification of start of construction	2	1	2	1	2	0.1	0	104		e
3) Notification of anticipated startup date	2	1	2	1	2	0.1	0	104		e
4) Notification of actual startup date	2	1	2	1	2	0.1	0	104		e
C. Request for compliance extension	8	1	8	0	0	0	0	0		
D. Notification of special compliance requirements	n/a	0	0	0	0	0	0	0		a
E. Notification of performance tests	2	0	0	0	0	0	0	0		
F. Notification of compliance status	8	1	8	1	8	0.4	1	417		
10. Recordkeeping requirements			0		0	0	0	0		
A. Read instructions	Included in 4.		0		0	0	0	0		
B. Plan and develop record system	Included		0		0	0	0	0		

**Table 2. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Plastic Parts and Products Surface Coating NESHAP--Subpart PPPP-Year 2 - Second Year After Promulgation (Continued)**

Burden item	Plant Hours per occurrence (A)	Number of occurrences per plant per year (B)	Plant hours per occurrence per year (C = A X B)	Number of plants per year (D)	Technical personnel hours per year (E=CxD)	Management personnel hours per year (F=Ex0.05)	Clerical personnel hours year (G=Ex0.1)	Total Labor Costs (\$) <sup>g</sup>	Total Non-Labor Costs	Footnotes
	in 5A.									
C. Record information	Included in 5B.		0		0	0	0	0		
D. Records for area sources not subject to the standard	n/a	0	0	0	0	0	0	0		
11. Reporting requirements			0		0	0	0	0	45	l
A. Semiannual compliance reports for all sources	8	1	8	1	8	0.4	1	417		j
B. Additional reports for sources with add-on control devices			0		0	0	0	0		
1) Control device and capture system performance test report	Included in 6A.		0		0	0	0	0		
2) Operating range for monitored parameters	Included in 6A.		0		0	0	0	0		
3) Startup, shutdown, malfunction reports	8	0	0	0	0	0	0	0		
12. Time to train personnel	400	1	400	1	400	20	40	20,843		f
13. Time for audits	n/a	0	0	0	0	0	0	0		a
TOTAL NON-LABOR COST									45	
TOTAL BURDEN (SALARY AND NON-LABOR COSTS)								31,675		
TOTAL ANNUAL HOURS					607	30	61	698		

a - n/a means that these activities are not applicable for this NESHAP in the three years after promulgation, although they will occur in subsequent years.

b - this is a one-time only cost

c - assume that new sources will comply using the weighted average option (one new source per year)

d - it is assumed that only existing sources that already have add-on controls will use add-on controls. Therefore, this activity will occur for those sources in year 3

e - these activities apply only to new sources. Projection of one new source per year

f - based on an average number of coating employees per facility of 50 each receiving 8 hours of training

g - labor costs are based on the loaded hourly wage rates of 45.74 for technical, 69.54 for managerial, and 28.91 for clerical

**Table 2. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Plastic Parts and Products Surface Coating NESHAP--Subpart PPPP-Year 2 - Second Year After Promulgation (Continued)**

j - the hours per occurrence is an average value based on the assumption that most facilities will not have a deviation and will spend less than 8 hours.

Also, most facilities do not have add-on controls and will not have to report parameter monitoring.

k - The hours per occurrence is an average value. Some facilities will need less time because they will have extensive usage tracking systems already in place.

Other facilities may need more time if they are using different compliance options for different areas of the facility because the usage tracking will be more involved.

l - operation and maintenance costs include photocopying and postage costs. Approximately \$7.50 per report to copy and send.



**Table 3. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Plastic Parts and Products Surface Coating NESHAP--Subpart PPPP-Year 3 - Third Year After Promulgation**

Burden item	Plant Hours per occurrence (A)	Number of occurrences per plant per year (B)	Plant hours per occurrence per year (C = A X B)	Number of plants per year (D)	Technical personnel hours per year (E=CxD)	Management personnel hours per year (F=Ex0.05)	Clerical personnel hours year (G=Ex0.1)	Total Labor Costs (\$)§	Total Non-Labor Costs	Footnotes
1. Applications	n/a	0	0	0	0	0	0	0		a
2. Survey and Studies	n/a	0	0	0	0	0	0	0		a
3. Acquire and install recordkeeping technology and systems	n/a	0	0	0	0	0	0	0		
4. Read and understand rule requirements	30	1	30	1	30	1.5	3	1,563		b
5. Required activities for all sources, with or without add-on controls			0		0	0	0	0		
A. Develop recordkeeping system (including emission rate calculation spreadsheets)			0		0	0	0	0		
1) Develop system, if using compliant materials option	25	1	25	40	1000	50	100	52,108		c
2) Develop system, if using the emission rate option, with or without add-on controls	60	1	60	163	9756	487.8	976	508,366		c, k
B. Enter information into recordkeeping system			0		0	0	0	0		
1) Enter information, if using compliant materials option	25	0	0	0	0	0	0	0		
2) Enter information, if using emission rate option, with or without add-on controls	40	0	0	0	0	0	0	0		
6. Additional required activities for sources with add-on control devices			0		0	0	0	0		d
A. Initial add-on control device and capture system performance tests and report	500	1	500	19	9500	475	950	495,026		
B. Establish operating parameters	Included in 6A		0	19	0	0	0	0		
C. Prepare startup, shutdown, and malfunction	80	1	80	19	1520	76	152	79,204		

**Table 3. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Plastic Parts and Products Surface Coating NESHAP--Subpart PPPP-Year 3 - Third Year After Promulgation (Continued)**

Burden item	Plant Hours per occurrence (A)	Number of occurrences per plant per year (B)	Plant hours per occurrence per year (C = A X B)	Number of plants per year (D)	Technical personnel hours per year (E=CxD)	Management personnel hours per year (F=Ex0.05)	Clerical personnel hours year (G=Ex0.1)	Total Labor Costs (\$)§	Total Non-Labor Costs	Footnotes
plan and a work practice plan										
D. Continuous parameter monitoring			0		0	0	0	0		
1) Initial costs	0	1	0	19	0	0	0	0	133,000	h
2) Annual costs	10	1	10	19	190	9.5	19	9,901		a
7. Create Information	Included in 5B		0		0	0	0	0		
8. Gather information	Included in 5B		0		0	0	0	0		
9. Notification requirements			0		0	0	0	0		
A. Initial notification that existing sources are subject to the standard	2	0	0	0	0	0	0	0		
B. Notifications for new major sources			0		0	0	0	0		
1) Notification of intent to construct a new major source and application for approval of construction	15	1	15	1	15	0.75	2	782		e
2) Notification of start of construction	2	1	2	1	2	0.1	0	104		e
3) Notification of anticipated startup date	2	1	2	1	2	0.1	0	104		e
4) Notification of actual startup date	2	1	2	1	2	0.1	0	104		e
C. Request for compliance extension	8	1	8	4	32	1.6	3	1,667		
D. Notification of special compliance requirements	n/a	0	0	0	0	0	0	0		a
E. Notification of performance tests	2	1	2	19	38	1.9	4	1,980		d
F. Notification of compliance status	8	1	8	2	16	0.8	2	834		
10. Recordkeeping requirements			0		0	0	0	0		
A. Read instructions	Included in 4.		0		0	0	0	0		
B. Plan and develop record system	Included in 5A.		0		0	0	0	0		

**Table 3. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Plastic Parts and Products Surface Coating NESHAP--Subpart PPPP-Year 3 - Third Year After Promulgation (Continued)**

Burden item	Plant Hours per occurrence (A)	Number of occurrences per plant per year (B)	Plant hours per occurrence per year (C = A X B)	Number of plants per year (D)	Technical personnel hours per year (E=CxD)	Management personnel hours per year (F=Ex0.05)	Clerical personnel hours year (G=Ex0.1)	Total Labor Costs (\$)ᑈ	Total Non-Labor Costs	Footnotes
C. Record information	Included in 5B.		0		0	0	0	0		
D. Records for area sources not subject to the standard	n/a	0	0	0	0	0	0	0		
11. Reporting requirements			0		0	0	0	0	375	
A. Semiannual compliance reports for all sources	8	2	16	2	32	1.6	3	1,667		j
B. Additional reports for sources with add-on control devices			0		0	0	0	0		
1) Control device and capture system performance test report	Included in 6A.		0		0	0	0	0		
2) Operating range for monitored parameters	Included in 6A.		0		0	0	0	0		
3) Startup, shutdown, malfunction reports	8	0	0	0	0	0	0	0		
12. Time to train personnel	400	1	400	203	81200	4060	8,120	4,231,170		f
13. Time for audits	n/a	0	0	0	0	0	0	0		
<b>TOTAL NON-LABOR COST</b>									133,375	
<b>TOTAL BURDEN (SALARY AND NON-LABOR COSTS)</b>								5,517,955		
<b>TOTAL ANNUAL HOURS</b>					103,335	5,167	10,334	118,835		

a - n/a means that these activities are not applicable for this NESHAP in the three years after promulgation, although they will occur in subsequent years.

b - this is a one-time only cost

c - assume that new sources will comply using the weighted average option (one new source per year)

assume that 20 percent of existing sources comply using the low/no-HAP option and the rest use the weighted average option

d - it is assumed that only existing sources that already have add-on controls will use add-on controls. Therefore, this activity will occur for those sources in year 3

e - these activities apply only to new sources. Projection of one new source per year

f - based on an average number of coating employees per facility of 50 each receiving 8 hours of training

g - labor costs are based on the loaded hourly wage rates of 45.74 for technical, 69.54 for managerial, and 28.91 for clerical

h - this non-labor cost is based on a \$7,000 per unit cost for each of the 19 existing facilities with add-on controls to install enclosure system monitoring.

j - the hours per occurrence is an average value based on the assumption that most facilities will not have

a deviation and will spend less than 8 hours. Also, most facilities do not have add-on controls and will not have to report parameter monitoring.

k - The hours per occurrence is an average value. Some facilities will need less time because they will have extensive usage tracking systems already in place.

Other facilities may need more time if they are using different compliance options for different areas of the facility because the usage tracking will be more involved.

**Table 3. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Plastic Parts and Products Surface Coating NESHAP--Subpart PPPP-Year 3 - Third Year After Promulgation (Continued)**

1 - operation and maintenance costs include photocopying and postage costs. Approximately \$7.50 per report to copy and send.

**Table 4. Summary of Industry Burden for the Standards for Surface Coating  
Of Plastic Parts and Products NESHAP--Subpart PPPP (Years 1 Through 3 and Average)**

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs		Total Costs
						Capital Costs	O&M Costs	
Year 1	7,015	351	702	8,067	365,537	0	1,545	367,082
Year 2	607	30	61	698	31,630	0	45	31,675
Year 3	103,335	5,167	10,334	118,835	5,384,580	133,000	375	5,517,955
Average Burden				42,533	1,927,249	44,333	655	1,972,237

### Attachment 3

#### TABLES 5, 6, 7, AND 8

- Table 5: Annual Federal Government Burden and Cost of Recordkeeping and Reporting Requirements for the Standard of Performance for National Emission Standards for Hazardous Air Pollutants for Plastic Parts and Products Surface Coating--40 CFR Part 63, Subpart PPPP - Year 1
- Table 6: Annual Federal Government Burden and Cost of Recordkeeping and Reporting Requirements for the Standard of Performance for National Emission Standards for Hazardous Air Pollutants for Plastic Parts and Products Surface Coating--40 CFR Part 63, Subpart PPPP - Year 2
- Table 7: Annual Federal Government Burden and Cost of Recordkeeping and Reporting Requirements for the Standard of Performance for National Emission Standards for Hazardous Air Pollutants for Plastic Parts and Products Surface Coating--40 CFR Part 63, Subpart PPPP - Year 3
- Table 8: Annual Federal Government Burden and Cost of Recordkeeping and Reporting Requirements for the Standard of Performance for National Emission Standards for Hazardous Air Pollutants for Plastic Parts and Products Surface Coating--40 CFR Part 63, Subpart PPPP - Years 1 through 3 and Average

**Table 5. Annual Federal Government Burden and Cost of Recordkeeping and Reporting for the Plastic Parts and Products Surface Coating NESHAP-Subpart PPPP-Year 1 - First Year After Promulgation**

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=AxB)	Technical hours per year (D=C)	Mangmt hours per year (E=Dx0.05)	Clerical hours per year (F=Dx0.1)	(H) Costs, \$ <sup>f</sup>	Footnotes
1. Litigation	n/a	0	0	0	0	0	0	a
2. Read and understand rule requirements	30	50	1500	1500	75	150	68,219	b
3. Enter and update information into agency recordkeeping system	4	1	4	4	0.2	0.4	182	
4. Required activities for sources with add-on control devices			0	0	0	0	0	c
A. Observe initial add-on control device performance test	40	0	0	0	0	0	0	
B. Observe repeat performance test	40	0	0	0	0	0	0	
C. Review operating parameters	2	0	0	0	0	0	0	
D. Review continuous parameter monitoring	2	0	0	0	0	0	0	
5. Excess Emissions Enforcement Activities and inspections	n/a	0	0	0	0	0	0	
6. Notification requirements			0	0	0	0	0	
A. Review initial notification that existing sources are subject to the standard	2	202	404	404	20.2	40.4	18,374	d
B. Notifications for new major sources			0	0	0	0	0	
1) Review notification of intent to construct a new major source and review application to construct	5	1	5	5	0.25	0.5	227	e
2) Review notification of start of construction	2	1	2	2	0.1	0.2	91	e
3) Review notification of anticipated startup date	2	1	2	2	0.1	0.2	91	e
4) Review notification of actual startup date	2	1	2	2	0.1	0.2	91	e
C. Review request for compliance extension	4	0	0	0	0	0	0	
D. Review notification of special compliance requirements	n/a	0	0	0	0	0	0	a
E. Review notification of initial performance tests and	20	0	0	0	0	0	0	c

**Table 5. Annual Federal Government Burden and Cost of Recordkeeping and Reporting for the Plastic Parts and Products Surface Coating NESHAP-Subpart PPPP-Year 1 - First Year After Promulgation (Continued)**

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=AxB)	Technical hours per year (D=C)	Mangmt hours per year (E=Dx0.05)	Clerical hours per year (F=Dx0.1)	(H) Costs, \$ <sup>f</sup>	Footnotes
review test plan								
F. Review notification of compliance status	4	0	0	0	0	0	0	
G. Records for area sources not subject to the standard	n/a	0	0	0	0	0	0	
H. Review of NESHAP waiver application	n/a	0	0	0	0	0	0	a
7. Reporting requirements			0	0	0	0	0	
A. Review semiannual compliance report	n/a	0	0	0	0	0	0	
B. Additional reports for sources with add-on control devices			0	0	0	0	0	c
1) Review of control device performance test report and operating range	20	0	0	0	0	0	0	
2) Review startup, shutdown, malfunction plans and work practice plans	8	0	0	0	0	0	0	
8. Travel Expenses for Tests Attended								c
TOTAL BURDEN AND COST (SALARY)							87,274	
TOTAL ANNUAL HOURS						2,207		

a - n/a means that these activities are not applicable for this NESHAP in the three years after promulgation, although they will occur in subsequent years

b - this is a one-time only cost

c - it is assumed that only existing sources that already have add-on controls will use add-on controls. Therefore, this activity will occur for those sources in year 3.

d - based on the plastic parts database which estimates 202 existing sources

e - these activities apply only to new sources. Projection of one new source per year

f - labor costs for agency personnel are based on the loaded hourly wage rates of 39.62 for technical, 57.92 for managerial, and 29.63 for clerical



**Table 6. Annual Federal Government Burden and Cost of Recordkeeping and Reporting for the Plastic Parts and Products Surface Coating NESHAP-Subpart PPPP-Year 2 - Second Year After Promulgation**

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=AxB)	Technical hours per year (D=C)	Management hours per year (E=Dx0.05)	Clerical hours per year (F=Dx0.1)	(H) Costs, \$ <sup>e</sup>	Footnotes
1. Litigation	n/a	0	0	0	0	0	0	a
2. Read and understand rule requirements	30	0	0	0	0	0	0	b
3. Enter and update information into agency recordkeeping system	4	203	812	812	40.6	81.2	36,929	
4. Required activities for sources with add-on control devices			0	0	0	0	0	c
A. Observe initial add-on control device performance test	40	0	0	0	0	0	0	
B. Observe repeat performance test	40	0	0	0	0	0	0	
C. Review operating parameters	2	0	0	0	0	0	0	
D. Review continuous parameter monitoring	2	0	0	0	0	0	0	
5. Excess Emissions Enforcement Activities and inspections	n/a	0	0	0	0	0	0	
6. Notification requirements			0	0	0	0	0	
A. Review initial notification that existing sources are subject to the standard	2	0	0	0	0	0	0	
B. Notifications for new major sources			0	0	0	0	0	
1) Review notification of intent to construct a new major source and review application to construct	5	1	0	0	0	0	0	d
2) Review notification of start of construction	2	1	2	2	0.1	0.2	91	d
3) Review notification of anticipated startup date	2	1	2	2	0.1	0.2	91	d
4) Review notification of actual startup date	2	1	2	2	0.1	0.2	91	d
C. Review request for compliance extension	4	0	0	0	0	0	0	
D. Review notification of special compliance requirements	n/a	0	0	0	0	0	0	a
E. Review notification of initial performance tests and review test plan	20	0	0	0	0	0	0	c
F. Review notification of compliance status	4	1	4	4	0.2	0.4	182	
G. Records for area sources not subject to the standard	n/a	0	0	0	0	0	0	
H. Review of NESHAP waiver application	n/a	0	0	0	0	0	0	a
7. Reporting requirements			0	0	0	0	0	
A. Review semiannual compliance report	8	1	8	8	0.4	0.8	364	

**Table 6. Annual Federal Government Burden and Cost of Recordkeeping and Reporting for the Plastic Parts and Products Surface Coating NESHAP-Subpart PPPP-Year 2 - Second Year After Promulgation (Continued)**

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=AxB)	Technical hours per year (D=C)	Management hours per year (E=Dx0.05)	Clerical hours per year (F=Dx0.1)	(H) Costs, \$ <sup>e</sup>	Footnotes
B. Additional reports for sources with add-on control devices			0	0	0	0	0	c
1) Review of control device performance test report and operating range	20	0	0	0	0	0	0	
2) Review startup, shutdown, malfunction plans and work practice plans	8	0	0	0	0	0	0	
8. Travel Expenses for Tests Attended		0						c
<b>TOTAL BURDEN AND COST (SALARY)</b>							37,748	
<b>TOTAL ANNUAL HOURS</b>						955		

a - n/a means that these activities are not applicable for this NESHAP in the three years after promulgation, although they will occur in subsequent years.

b - this is a one-time only cost.

c - it is assumed that only existing sources that already have add-on controls will use add-on controls. Therefore, this activity will occur for those sources in year 3.

d - these activities apply only to new sources. Projection of one new source per year.

e - labor costs for agency personnel are based on the loaded hourly wage rates of 39.62 for technical, 57.92 for managerial, and 29.63 for clerical.

**Table 7. Annual Federal Government Burden and Cost of Recordkeeping and Reporting for the Plastic Parts and Products Surface Coating NESHAP-Subpart PPPP-Year 3 - Third Year After Promulgation**

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=AxB)	Technical hours per year (D=C)	Mangmt hours per year (E=Dx0.05)	Clerical hours per year (F=Dx0.1)	(H) Costs, \$ <sup>e</sup>	Footnotes
1. Litigation	n/a	0	0	0	0	0	0	a
2. Read and understand rule requirements	30	0	0	0	0	0	0	b
3. Enter and update information into agency recordkeeping system	4	1	4	4	0.2	0.4	182	
4. Required activities for sources with add-on control devices			0	0	0	0	0	c
A. Observe initial add-on control device performance test	40	9	360	360	18	36	16,372	
B. Observe repeat performance test	40	0	0	0	0	0	0	
C. Review operating parameters	2	19	38	38	1.9	3.8	1,728	
D. Review continuous parameter monitoring	2	0	0	0	0	0	0	
5. Excess Emissions Enforcement Activities and inspections	n/a	0	0	0	0	0	0	
6. Notification requirements			0	0	0	0	0	
A. Review initial notification that existing sources are subject to the standard	2	0	0	0	0	0	0	
B. Notifications for new major sources			0	0	0	0	0	
1) Review notification of intent to construct a new major source and review application to construct	5	1	5	5	0.25	0.5	227	d
2) Review notification of start of construction	2	1	2	2	0.1	0.2	91	d
3) Review notification of anticipated startup date	2	1	2	2	0.1	0.2	91	d
4) Review notification of actual startup date	2	1	2	2	0.1	0.2	91	d
C. Review request for compliance extension	4	3	12	12	0.6	1.2	546	
D. Review notification of special compliance requirements	n/a	0	0	0	0	0	0	a
E. Review notification of initial performance tests and review test plan	20	19	380	380	19	38	17,282	c
F. Review notification of compliance status	4	1	4	4	0.2	0.4	182	
G. Records for area sources not subject to the standard	n/a	0	0	0	0	0	0	
H. Review of NESHAP waiver application	n/a	0	0	0	0	0	0	a

**Table 7. Annual Federal Government Burden and Cost of Recordkeeping and Reporting for the Plastic Parts and Products Surface Coating NESHAP-Subpart PPPP-Year 3 - Third Year After Promulgation (Continued)**

Burden Item	EPA hours per occurrence (A)	Number of occurrences per year (B)	EPA hours per occurrence per year (C=AxB)	Technical hours per year (D=C)	Mangmt hours per year (E=Dx0.05)	Clerical hours per year (F=Dx0.1)	(H) Costs, \$ <sup>e</sup>	Footnotes
7. Reporting requirements			0	0	0	0	0	
A. Review semiannual compliance report	8	3	24	24	1.2	2.4	1,091	
B. Additional reports for sources with add-on control devices			0	0	0	0	0	
1) Review of control device performance test report and operating range	20	0	0	0	0	0	0	
2) Review startup, shutdown, malfunction plans and work practice plans	8	19	152	152	7.6	15.2	6,913	
8. Travel Expenses for Tests Attended	(1 person x 9 plants/year 3 x 1 day/plant x \$50 per diem) + (\$400/round trip x 9 trips/year 3) = \$4050 in year 3						4,050	c
TOTAL BURDEN AND COST (SALARY)							48,847	
TOTAL ANNUAL HOURS						1133		

- a - n/a means that these activities are not applicable for this NESHAP in the three years after promulgation, although they will occur in subsequent years.
- b - this is a one-time only cost.
- c - it is assumed that only existing sources that already have add-on controls will use add-on controls. Therefore, this activity will occur for those sources in year 3.
- d - these activities apply only to new sources. Projection of one new source per year.
- e - labor costs for agency personnel are based on the loaded hourly wage rates of 39.62 for technical, 57.92 for managerial, and 29.63 for clerical.

**Table 8. Summary of Federal Government Burden for the Plastic Parts and Products  
Surface Coating NESHAP -- Subpart PPPP (Years 1 Through 3 and Average)**

<b>Agency Burden Summary</b>	<b>Technical Hours</b>	<b>Management Hours</b>	<b>Clerical Hours</b>	<b>Total Hours</b>	<b>Total Costs</b>
Year 1	1,919	96	192	2,207	87,274
Year 2	830	42	83	955	37,748
Year 3	985	49	99	1,133	48,847
Average Burden				1,432	57,956