

SUPPORTING STATEMENT

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR PLATING AND POLISHING OPERATIONS (40 CFR part 63, subpart WWWWWW)

PART A

1.0 Identification of the Information Collection

(a) *Title and Number of the Information Collection.*

“National Emission Standards for Hazardous Air Pollutants for Plating and Polishing Operations (40 CFR part 63, subpart WWWWWW) (Proposed Rule).” This is a new information collection request (ICR), and the EPA tracking number is 2294.01.

(b) *Short Characterization.*

This ICR covers information collection requirements in the proposed area source rule for Plating and Polishing (40 CFR part 63, subpart WWWWWW).

The potential respondents are owners or operators of any existing or new plating and polishing facility that is an area source of hazardous air pollutants (HAP) emissions and uses one or more of the following metal HAP: cadmium, chromium, lead, manganese, or nickel (hereafter referred to as the plating and polishing metal HAP). There are an estimated 2,900 facilities subject to the NESHAP for the Plating and Polishing Area Source Category. The affected source at a plating and polishing facility includes all plating and polishing tanks that contain one or more of the plating and polishing metal HAP; thermal spraying operations that use one or more of the plating and polishing metal HAP; and dry mechanical polishing operations that emit one or more of the plating and polishing metal HAP. Plating and polishing facilities are currently well-controlled in terms of metal HAP emissions as a result of State and national standards, permitting requirements, and management practices already used by the industry to reduce metal HAP.

The proposed rule will require owners or operators of affected electroplating or electroforming tanks, which are operated at a pH of less than 12, and all affected electropolishing tanks to either use a wetting agent/fume suppressant (WAFS) in the tank bath, or exhaust emissions from the tanks to an add-on emission control device, such as a composite mesh pad,

packed bed scrubber, or mesh pad mist eliminator. The proposed rule will require owners and operators of short-term or "flash plating" operations to limit plating to no more than one hour per day or 3 minutes per hour of plating time, whichever is less, or use covers on the tanks for 95 percent of the total plating time. In addition, owners or operators of all affected plating and polishing tanks will be required to comply with the following good management and pollution prevention practices: (1) minimize bath agitation when removing and plating parts; (2) maximize dripping of plating solution back into bath by extending drip time when removing the plated objects and using drain boards (also known as drip shields); (3) optimize design of barrels, racks, and parts, such as using slotted barrels, tilted racks, or designing parts with flow-through holes; (4) use tank covers, if available, when possible (i.e., not during lifting or lowering parts); and (5) minimize or reduce heating during plating and when tanks are not in use.

Owners or operators of affected dry mechanical polishing operations will be required to operate a capture system that is designed to collect the majority of metal HAP emissions from these sources and exhaust the emissions to a filtration device such as a cartridge filter. Owners or operators of existing thermal spraying operations will be required to exhaust emissions from thermal spraying to a water curtain, or an equivalent or better control device. The proposed rule will require emissions from new thermal spraying operations to be controlled using a fabric or HEPA filter.

Compliance requirements will include submitting initial notifications of applicability and compliance status and submitting annual compliance certifications and reports of deviations. In addition, owners or operators of affected facilities will be required to maintain records, including records of all required notifications and reports, with supporting documentation; records showing compliance with good management and pollution prevention practices; and, if applicable, records of the amount and frequency of WAFS additions; daily plating time; the time the tank is operated with a cover in place; and maintenance of any required capture and control systems.

The information collection requirements for existing and new sources in the Plating and Polishing Source Category are listed in Attachment 1.

2. Need For and Use of the Collection

(a) Need/Authority for the Collection.

Section 112 of the Clean Air Act (CAA) requires EPA to establish NESHAP for both major and area sources of HAP that are listed for regulation under CAA section 112(c). An area source is a stationary source that is not a major source (i.e., an area source does not emit and does not have the potential to emit more than 10 tons per year [tpy] of any single HAP and more than 25 tpy of any combination of HAP). Requirements for area sources in CAA sections 112(c) (3) and 112(k) direct EPA to (1) identify at least 30 air toxics that present the greatest potential health threat in the largest number of urban areas and (2) to identify sufficient area source categories to ensure that sources representing 90 percent or more of the emissions of the 30 “listed” HAP are subject to regulation. EPA implements these requirements through the Integrated Urban Air Toxics Strategy (64 FR 38715, July 19, 1999). EPA added Plating and Polishing to the Integrated Urban Air Toxics Strategy area source category list on June 26, 2002 (67 FR 43112) The initial listing of the Plating and Polishing Area Source Category was based on emissions of cadmium, chromium, lead, manganese, and nickel. Each of these HAP metals is on the list of 30 HAP identified in the 1999 strategy.

Under CAA section 112(d)(5), EPA may elect to promulgate HAP standards for area sources based on the use of generally available control technology (GACT) or management practices used by the sources. EPA can consider costs and economic impacts in determining GACT, which is particularly important when developing regulations for source categories that may have few establishments and many small businesses, or when determining whether additional control is needed for sources that are already well-controlled as a result of other air emissions standards.

Certain records and reports are necessary for the Administrator to confirm the compliance status of area sources, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the Clean Air Act (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions. The recordkeeping and reporting requirements for title V permits are contained in 40 CFR 70.6 and 40 CFR 71.6. Under parts 63

and 70 or 71, the owner or operator must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(b) Use/Users of the Data.

The information will be used by the delegated authority (State agency, or Regional Administrator if there is no delegated State agency) to ensure that the standards and other requirements are being achieved. Based on review of the recorded information at the site and the reported information, the delegated permitting authority can identify facilities that may not be in compliance and decide which facilities, records, or processes may need inspection.

3. Nonduplication, Consultations, and Other Collection Criteria

(a) Nonduplication.

A computer search of EPA’s ongoing ICRs revealed no duplication of information-gathering efforts.

(b) Public Notice Required Prior to ICR Submission to OMB.

Public notice is given as part of the rulemaking process..

(c) Consultations.

The proposed rule was developed in consultation with individual companies, State agencies, and trade associations. The non-EPA persons consulted on the information collection activities are identified in Table 1.

TABLE 1. PERSONS CONSULTED ON THE INFORMATION COLLECTION ACTIVITIES

Contact	Organization	Telephone No.
Renee Lesjak Bashel	Wisconsin Department of Commerce	(608) 264-6153
Jeff Hannapel	The Policy Group/National Association for Surface Finishing	(202) 457-0630
Lisa Higgins	Maine Department of Environmental Protection	(207) 287-2437
Roslyn Jackson	Illinois Department of Commerce & Economic Opportunity	(217) 524-0169
John Lindstedt	Artistic Plating Company	(414) 271-8138
B.J. Mason	Mid-Atlantic Finishing Corporation	(301) 322-2233
Terry L. Polen	West Virginia Department of Environmental Protection	(304) 926-0440
Richard Rasmussen	Virginia Department of Environmental Quality	(804) 698-4394
Christian Richter	The Policy Group/National Association for Surface Finishing	(202) 457-0630
Mark Stoddard	Indiana Department of Environmental Management	(317) 233-1039
Phyllis Strong	Minnesota Pollution Control Agency	(651) 296-9207
Joelie Zak	Scientific Control Laboratories, Inc.	(773) 254-2406

(d) *Effects of Less Frequent Collection.*

If the relevant information were collected less frequently, the delegated permitting authority (State or EPA) will not be reasonably assured that a facility is in compliance with the standards.

(e) *General Guidelines.*

None of the guidelines in 5 CFR 1320.6 are being exceeded.

(f) *Confidentiality.*

All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B--Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

(g) *Sensitive Questions.*

This section is not applicable because this ICR does not involve matters of a sensitive nature.

4. The Respondents and the Information Requested

(a) *Respondents/NAICS Codes.*

Potential respondents under Subpart WWWW are owners or operators of any existing or new facility engaged in one or more of the following operations: electroplating other than chromium electroplating (i.e., nonchromium electroplating); electroless plating; other non-electrolytic metal coating, such as chromate conversion coating and thermal spraying; and the polishing of finished metals and formed products after plating. Plating and polishing facilities are primarily classified under NAICS code 332813. However, plating and polishing processes are also collocated at many facilities that are classified under other NAICS codes. Examples include NAICS 33251, Hardware Manufacturing; 323111, Commercial Gravure Printing; 332116, Metal Stamping; 332722, Bolt, Nut, Screw, Rivet, and Washer Manufacturing; 332811, Metal Heat Treating; 332812, Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers; 332913, Plumbing Fixture Fitting and Trim Manufacturing; Other Metal Valve and Pipe Fitting Manufacturing; 332999, All Other Miscellaneous Fabricated

Metal Product Manufacturing; 334412, Bare Printed Circuit Board Manufacturing; 336412, Aircraft Engine and Engine Parts Manufacturing; and 339911, Jewelry (except Costume) Manufacturing.

There are an estimated 2,900 facilities that will be subject to the NESHAP for the Plating and Polishing Area Source Category; no new plating and polishing area sources are expected during the 3year period of this ICR.

(b) Information Requested.

(i) Data Items, Including Recordkeeping Requirements. Attachment 1, Information Requirements, summarizes the data items, including recordkeeping and reporting requirements, for the Plating and Polishing Area Source Category.

(ii) Respondent Activities. The respondent activities that will be required by the proposed Plating and Polishing Rule are identified in Table 2 and are introduced in section 6(a).

5. The Information Collected–Agency Activities, Collection Methodology, and Information Management

(a) Agency Activities.

The Agency activities associated with the proposed Plating and Polishing Rule are provided in Table 3 and are introduced in section 6(c).

(b) Collection Methodology and Management.

Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs of the delegated permitting authority. The notifications of compliance status, annual compliance certifications, and reports of deviations required under the proposed rule are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. EPA is the permitting authority until the State agency is delegated authority to implement the final rule. Therefore, information contained in the reports submitted to the Regional Administrator will be entered into the Air Facility System (AFS), which is operated and maintained by EPA’s Office of Compliance. AFS is EPA’s database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS 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.

(c) *Small Entity Flexibility.*

The Small Business Administration defines a small entity for the plating and polishing industry as a firm having no more than 500 to 1,000 employees (depending on the size definition for the affected NAICS code). There will not be adverse impacts on any small entities in the Plating and Polishing Area Source Category. The proposed rule will not create any new requirements or burdens for existing sources other than minimal notification requirements, recordkeeping, and reporting requirements.

(d) *Collection Schedule.*

The specific frequency for each information collection activity within this request is shown in Table 2 for the Plating and Polishing Area Source Category.

6. Estimating the Burden and Cost of the Collection

(a) *Estimating Respondent Burden.*

The annual burden estimates for the proposed Plating and Polishing NESHAP are shown in Table 2. These numbers were derived from estimates based on EPA's experience with other standards. No burden estimates are provided for new area sources because no new facilities are expected to become affected sources during the 3year period of this ICR.

(b) *Estimating Respondent Costs.*

The information collection activities for the proposed Plating and Polishing NESHAP are presented in Table 2. Because the data are already collected by respondents as part of normal operations, no respondent development costs are associated with the information collection activities.

(i) *Estimating Labor Costs.* Labor rates and associated costs are based on Bureau of Labor Statistics (BLS) data. Technical, management, and clerical average hourly rates for private industry workers were taken from the United States Department of Labor, Bureau of Labor Statistics, June 2007, "Table 2. National Compensation Survey: Occupational Wages in the United States" available at <http://www.bls.gov/ncs/ocs/sp/ncbl0910.pdf> . Wages for technical labor are based on "Production occupations: Plating and coating machine setters, operators, and tenders, metal and plastic" with a total compensation of \$14.88/hour. Wages for

management labor are taken from "Production occupations: First-line supervisors/managers of production and operating workers" with a total compensation of \$22.99/hour. Wages for clerical labor are based on "Office and administrative support occupations: File clerks" with a total compensation of \$12.25/hour. These rates represent salaries plus fringe benefits and do not include the cost of overhead. An overhead rate of 110 percent is used to account for these costs. The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$31.25, management at \$48.28, and clerical at \$25.73.

(ii) *Estimating Capital and Operations and Maintenance (O&M) Costs.* The only capital costs associated with the information collection requirements of the proposed Plating and Polishing NESHAP will be the cost to purchase file cabinets for keeping records. The proposed rule will not require affected facilities to purchase monitoring systems or conduct performance testing. There are no O&M costs associated with the proposed Plating and Polishing NESHAP because existing facilities are already in compliance with the requirements of the proposed NESHAP. Capital and O&M costs were not estimated for new sources because no new sources are expected during the next 3-year period.

(iii) *Annualizing Capital Costs.* For the proposed Plating and Polishing NESHAP, the annualized capital costs include the costs of file cabinets only.

(c) *Estimating Agency Burden and Cost.*

Because the information collection requirements were developed as an incidental part of standards development, no costs can be attributed to the development of the information collection requirements. Because reporting and recordkeeping requirements on the part of the respondents are required under the operating permits rules in 40 CFR part 70 or part 71 and the part 63 NESHAP General Provisions, no operational costs will be incurred by the Federal Government. Publication and distribution of the information are part of the Compliance Data System, with the result that no Federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of sources that is part of EPA's overall compliance and enforcement program, and, therefore, is not attributable to the ICR. The only costs that the Federal government will incur are user costs associated with the analysis of the reported information, as presented in Table 3.

The Agency labor rates are from the Office of Personnel Management (OPM) 2006 General Schedule which excludes locality rates of pay. These rates can be obtained from Salary Table 2006-GS available on the OPM website, http://www.opm.gov/oca/06tables/html/gs_h.asp. The government employee labor rates are \$14.35/hour for clerical (GS-6, Step 3), \$26.53 for technical (GS-12, Step 1), and \$35.75/hr for management (GS-13, Step 5). These rates were increased by 60 percent to include fringe benefits and overhead. The fully-burdened wage rates used to represent Agency labor costs are: clerical at \$22.96; technical at \$42.45, and management at \$57.20.

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

There are an estimated 2,900 existing facilities that will be subject to the Plating and Polishing Area Source NESHAP. No new sources are expected during the next 3 years.

For the proposed Plating and Polishing NESHAP, the components of the total annual responses attributable to this ICR are one-time initial notifications, one-time notifications of compliance status, annual compliance certifications for the 2,900 facilities that will be subject to the rule. In addition, facilities that experience a deviation will have to submit a report of deviations.

(e) Bottom Line Burden Hours and Cost Tables.

(i) Respondent tally. The bottom line respondent burden hours and costs, presented in Table 2 are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column. The average annual burden for the recordkeeping and reporting requirements in subpart WWWW for the 2,900 existing facilities that subject to the Plating and Polishing Area Source NESHAP is 33,567 person-hours, with an annual average cost of \$1,057,733 and annualized capital costs of \$24,942.

(ii) The Agency tally. The average annual Federal Government cost is \$234,698 for 5,670 hours for subpart WWWW. The bottom line Agency burden hours and costs presented in Table 3 are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column.

(iii) Variations in the annual bottom line. This section does not apply since no significant variation is anticipated.

(f) Reasons for Change in Burden.

This section does not apply because this is a new ICR.

(g) *Burden Statement*

The average annual respondent burden for the proposed NESHAP for Plating and Polishing Area Sources is estimated at 11 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 in 40 CFR part 63 are listed in 40 CFR part 9.

To comment on the Agency's need for this information the accuracy of the provided burden estimates, and any suggestions for minimizing respondent burden, including through the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2005-0084, which is available for online viewing at <http://www.regulations.gov>, or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1742, and the telephone number for the Air Docket is (202) 566-1927. An electronic version of the public docket is available at <http://www.regulations.gov>. This site can be used 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. When in the system, select "search," then key in one of the Docket ID Numbers 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 Officer for EPA. Please include the relevant Docket ID Number (EPA-HQ-OAR-2005-0084) in any correspondence.

PART B

This section is not applicable because statistical methods are not used in data collection associated with the proposed rule.

TABLE 2. ANNUAL RESPONDENT BURDEN AND COST--NESHAP FOR PLATING AND POLISHING AREA SOURCES

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent	(C) Person-hours per respondent (C=A*B)	(D) Respondents per year	(E) Technical person-hours per year (E=C*D)	(F) Management person-hours per year (E*0.05)	(G) Clerical person-hours per year (E*0.1)	(H) Cost^a, \$
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Read instructions ^b	4	1	4.0	967	3,867	193	387	\$140,116
B. Required activities								
Initial Notification of applicability ^c	2	1	2.0	967	1,933	97	193	\$70,058
Notification of Compliance Status ^d	4	1	4.0	967	3,867	193	387	\$140,116
Annual Compliance Certification ^e	2	1	2.0	967	1,933	97	193	\$70,058
Annual Report of Deviations ^f	2	1	2.0	48	97	4.8	9.7	\$3,503
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
5. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 5E							
C. Implement activities	See 5E							
D. Develop record system	See 5E							
E. Time to enter information	N/A							
Records of all information required by standards ^g	0.33	52	17.3	967	16,756	838	1,676	\$607,171
F. Time to train personnel	N/A							
G. Time to adjust existing ways to comply with previously applicable requirements	N/A							
H. Time to transmit or disclose information ^h	0.25	1	0.25	2,948	737	37	74	\$26,710
I. Time for audits	N/A							
TOTAL LABOR BURDEN AND COST (SALARY)					29,189	1,459	2,919	\$1,057,733
TOTAL NUMBER OF ANNUAL RESPONSESⁱ				2,948				
ANNUAL CAPITAL COSTS								
File cabinets ^j								\$227,167
ANNUALIZED CAPITAL COSTS^k								
File cabinets (15 year life, 7% interest -> CRF=0.1098)								\$24,942
TOTAL ANNUALIZED COSTS								\$24,942

N/A = not applicable.

- ^a This ICR uses the following labor rates: \$48.28 for managerial labor, \$31.25 for technical labor, and \$25.73 for clerical labor. These rates are based on the U.S. Department of Labor, Bureau of Labor Statistics, June 2006, Table 2, National Compensation Survey: Occupational Wages in the United States. June 2007.
- ^b There are an estimated 2,900 existing plating and polishing plants and no new facilities are expected; the average number expected to read the rule during the 3-yr clearance period is $2,900/3 = 967$.
- ^c Each of the 2,900 existing plants noted above would be required to submit an Initial Notification.
- ^d Each of the 2,900 existing plants noted above would be required to submit a Notification of Compliance Status.
- ^e The 2,900 existing plants would be required to submit an Annual Compliance Certification at the end of Year 3 of the ICR clearance period, or $2,900/3 = 967$.
- ^f Assumes that 5% of existing facilities would have to submit a Report of Deviations starting in Year 3 of the ICR clearance period, or $(2,900 \times 0.05)/3 = 48$.
- ^g Recordkeeping requirements begin in Year 3 of ICR clearance period for all existing plants, or $2,900/3 = 967$; it is assumed that 0.33 hr (20 minutes) per week will be required per facility for recordkeeping.
- ^h Transmittals would include Initial Notifications for 2,900 plants, Notifications of Compliance Status for 2,900 plants, Annual Compliance Certifications for 2,900 plants, and annual Reports of Deviations for 5% of facilities in Year 3, for an average of $(2,900+2,900+2,900+2,900 \times 0.05)/3 = 2,948$ for each year of the 3-yr ICR clearance period.
- ⁱ The total annual number of responses is calculated by summing the product of columns B and D for each of the reports listed in 4B.
- ^j Assumes one standard four-drawer file cabinet for each of the 2,900 facilities, or an average of $2,900/3=967$ per year required to maintain records at a cost of \$235 per cabinet.
- ^k Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. $CRF=(i) \cdot (1+i)^t / ((1+i)^t - 1)$ where i = interest rate (%) and t = equipment life (years).

3. ANNUAL BURDEN AND COST TO THE AGENCY--NESHAP FOR PLATING AND POLISHING AREA SOURCES

Burden item	(A) Person-hours per occurrence	(B) Occurrences per respondent	(C) EPA person-hours/year (C=A*B)	(D) Facilities per year	(E) Technical person-hours/year (D=A*B*C)	(F) Management person-hours/year (E=0.05*D)	(G) Clerical person-hours/year (F=0.1*D)	(H) Cost ^a , \$
Report Review:								
Initial Notification of applicability ^b	1	1	1.0	967	967	48	97	\$46,019
Notification of Compliance Status ^c	2	1	2.0	967	1,933	97	193	\$92,038
Annual Compliance Certification ^d	2	1	2.0	967	1,933	97	193	\$92,038
Annual Report of Deviations ^e	2	1	2.0	48	97	4.8	9.7	\$4,602
TOTAL BURDEN AND COST						5,670		\$234,698

^a This ICR uses the following average hourly labor rates: \$57.20 for managerial (GS-13, Step 5, \$35.75 x 1.6), \$42.45 (GS-12, Step 1, \$26.53 x 1.6) for technical and \$22.96 (GS-6, Step 3, \$14.35 x 1.6) for clerical. These rates are from the Office of Personnel Management (OPM) 2006 General Schedule, which excludes locality rates of pay.

^b Assumes 2,900 existing and no new plants will complete Initial Notifications for an average of $(2,900)/3 = 967$ per year during each year of the 3-yr ICR clearance period.

^c Each of the 2,900 existing plants noted above would be required to submit a Notification of Compliance Status.

^d The 2,900 existing plants would be required to submit an Annual Compliance Certification at the end of Year 3 of the ICR clearance period, or $2,900/3 = 967$.

^e Assumes that 5% of existing facilities would have to submit a Report of Deviations starting in Year 3 of the ICR clearance period, or $(2,900 \times 0.05)/3 = 48$.

ATTACHMENT 1. INFORMATION REQUIREMENTS--NESHAP FOR PLATING AND POLISHING AREA SOURCES

Requirement	Citation for existing sources	Citation for new sources	General Provisions citation
Monitoring	N/A	N/A	N/A
Notifications			
Notification of applicability	§63.11500(a)	§63.11500(a)	40 CFR 63.9(a)(2)
Notification of construction/reconstruction	N/A	N/A	40 CFR 63.9(b)(5)
Notification of special compliance requirements	N/A	N/A	40 CFR 63.9(d)
Notification of performance test	N/A	N/A	40 CFR 63.9(e)
Notification of opacity/VE observations	N/A	N/A	40 CFR 63.9(f)
Additional CMS notifications	N/A	N/A	40 CFR 63.9(g)
Notification of compliance status	§63.11500(b)	§63.11500(b)	40 CFR 63.9(h)
Notification of changes in information	N/A	N/A	40 CFR 63.9(j)
Plans			
SSM plan	N/A	N/A	40 CFR 63.6(e)(3)
Performance test plan	N/A	N/A	40 CFR 63.7(c)(2)
CMS quality control plan	N/A	N/A	40 CFR 63.8(d)
CMS performance evaluation test plan	N/A	N/A	40 CFR 63.8(e)(3)
Records			
Records of notifications	§63.11500(e)(1)	§63.11500(e)(1)	40 CFR 63.10
Records that demonstrate continuous compliance	§63.11500(e)(4)	§63.11500(e)(4)	40 CFR 63.10
Monitoring/inspection information	N/A	N/A	40 CFR 63.10
Reports			
Reports of deviations	§63.11500(d)	§63.11500(d)	N/A
Semiannual monitoring reports	N/A	N/A	N/A
Initial/repeat performance tests	N/A	N/A	40 CFR 63.7(e)(1) /40 CFR63.6(h)(7)
Quality assurance test plan	N/A	N/A	40 CFR 63.7(c)
CMS performance evaluation/report	N/A	N/A	40 CFR 63.8(e)(5)
SSM reports	N/A	N/A	40 CFR 63.6(e)(3)
Excess emissions reports	N/A	N/A	40 CFR 63.10(e)(3)
Annual compliance certifications	§63.11500(c)	§63.11500(c)	N/A