

**Supporting Statement  
for  
National Volatile Organic Compound (VOC) Emission Standards for  
Aerosol Coatings (40 CFR Part 59, Subpart E) (Final Rule)**

**1. IDENTIFICATION OF THE INFORMATION COLLECTION**

**1(a) Title and Number of Information Collection**

National Volatile Organic Compound (VOC) Emission Standards for Aerosol Coatings (40 CFR Part 59, Subpart E), ICR number 2289.01, OMB control number 2060-NEW.

**1(b) Short Characterization/Abstract**

The National Volatile Organic Compound (VOC) Emission Standards for Aerosol Coatings (40 CFR Part 59, subpart E) are being promulgated. We developed the final action pursuant to the requirements of section 183(e) of the Clean Air Act (CAA).

Section 183(e) of the CAA requires EPA to regulate consumer or commercial products that account for at least 80 percent of the VOC emissions, on a reactivity-adjusted basis, in areas that violate the national ambient air quality standards for ozone. The CAA also directs EPA to divide the consumer or commercial products into four groups, and establish priorities for regulation until all 4 groups are regulated. Of the 22 source categories identified and divided into four groups, the aerosol coatings source category is in Group III, and is currently slated for regulation. When these standards are final,

regulated entities will have to comply with recordkeeping and reporting requirements of the new rule.

This ICR includes the burden for activities that will be conducted in the first three years following promulgation of the national volatile organic compound (VOC) emission standards for aerosol coatings. The regulated entities will read instructions to determine how they will be affected by the rule.

New and existing regulated entities will have to submit an initial notification. Regulated entities will also be required to submit notifications of changes in the products or company information and to maintain records. In addition, regulated entities will be required to submit triennial reports of formulation data and VOC usage. Respondent and burden estimates are included in Tables 2 and 3.

## **2. NEED FOR AND USE OF THE COLLECTION**

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

The EPA is charged under section 183 (e) of the Clean Air Act (CAA), as amended, to establish emission standards for aerosol coatings. The national volatile organic compound (VOC) emission standards for aerosol coatings (*40 CFR Part 59, subpart E*) are being promulgated. We developed the final action pursuant to the requirements of section 183(e) of the Clean Air Act (CAA).

Section 183(e) of the CAA requires EPA to regulate consumer or commercial products that account for at least 80 percent of the VOC emissions, on a reactivity-adjusted basis, in areas that violate the national ambient air quality standards for ozone. The CAA also directs EPA to divide the consumer or commercial products into four groups, and establish priorities for regulation until all 4 groups are regulated. Of the 22 source categories identified and divided into four groups, the aerosol coatings source category is in Group III, and is currently slated for regulation. When these standards are final, regulated entities will have to comply with recordkeeping and reporting requirements of the new rule.

The information collection requirements are based on recordkeeping and reporting requirements. These recordkeeping and reporting requirements are specifically authorized by CAA section 114 (42 U.S.C. 7414). All information submitted to EPA pursuant to the recordkeeping and reporting requirements for which a claim of confidentiality is made is safeguarded according to Agency policies set forth in 40 CFR part 2, subpart B. Initial notifications and reports, as described in this information collection request, are necessary to enable the Administrator to determine if the standards are being achieved. The emission standards require an initial notification report from all regulated entities to EPA 90 days before the compliance

date. The regulated entity is required to maintain compliance calculations for each of its aerosol coatings formulations. Records of these calculations must be maintained 5 years after the product is manufactured, processed, distributed for wholesale, or imported for sale or distribution in interstate commerce in the United States. The retention of records for 5 years would allow EPA to establish the compliance history of a regulated entity and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the 5 years. The EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records, if records were retained for less than 5 years.

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

## **2(b) Practical Utility/Users of the Data**

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

### **3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION**

#### **CRITERIA**

#### **3(a) Nonduplication**

The subject emission standards are delegated to the EPA and information is sent directly to the appropriate EPA Regional Office. EPA has not duplicated the recordkeeping and reporting requirements for regulated entities that may be subject to the rule covered under this ICR.

#### **3(b) Public Notice Required Prior to ICR Submission to OMB**

A public notice of this collection was provided in the notice of proposed rulemaking for the national VOC emission standards for aerosol coatings.

#### **3(c) Consultations**

During the development of this rule, EPA met with industry and its representative trade association in order to obtain an industry description, information on the aerosol coatings market, and input on costs associated with the aerosol coatings

industry. Also, EPA conducted searches of the potential regulated entities to obtain information on the universe of affected. The public had an opportunity to review and comment on the proposed rule and ICR during the specified comment period.

Table 1. Consultations

Pat Gieske	Seymour of Sycamore
Gregory L. Johnson	The Sherwin Williams Company
Jim Johnson	The Sherwin Williams Company
Ed Piszynski	Hydrosol, Inc.
Heidi K. McAuliffe	National Paint and Coatings Assoc.
Doug Raymond	Doug Raymond Associates
State of California	Air Resources Board
Ed Laird	Coatings Resource Corp.
Robert Sliwinski	NY State Department of Environmental Conservation
Diane Nash	Akso Nobel Car Refinishes North America
Arthur Marin	NESCAUM
Anna Garcia	Ozone Transport Commission
Sharon Kneiss	American Chemical Council
Ann Gobin	Connecticut Department of Environmental Protection
Stephen Risetto	Halogenated Solvent Industry Alliance
Patrice Simms	National Resource Defense Council
Douglas Fratz	Consumer Specialty Products Association
Guo Lisheng	China WTO/TBT National Notification and Enquiry Center
Roger Vanerlaan	Shield Packaging of California
Gary Silvers	Meguiars
Chad Moline	IKI Manufacturing Company
Jerry Ulrich	Four Star Chemical
Michael Bell	BAF Industries
Steve Gaver	SEM Products, Inc.

**3(d) Effects of Less Frequent Collection**

The proposed rule includes the minimum requirements needed to demonstrate compliance with the rule. The proposed rule requested comment on the feasibility and need for a requirement for regulated entities to submit to the Agency their VOC formulations for each product or product formulation in the initial report and on a periodic basis thereafter. Numerous commenters provided input on the need, or lack of need, for additional reporting requirements, in general, and the annual reporting of formulation data, in particular. Some commenters, mostly aerosol industry representatives, contended that no additional periodic reporting was warranted. Others, particularly regulatory agencies and environmental groups, stated their belief that the rule is not enforceable without additional reporting. Based on this input, and EPA's own review, EPA has determined that initial reporting of formulation data and ongoing reporting on a triennial basis are needed. The initial reporting is needed to ensure that the rule is implementable as a practical matter. The triennial reporting will enable EPA to better assess the efficacy of the reactivity-based approach, including the manner in which the programs requirements are being achieved.

### **3(e) General Guidelines**

This ICR adheres to the guidelines for Federal data requesters, as provided at 5 CFR 1320.6. Initial notifications

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

### **3(f) Confidentiality**

All information submitted to EPA for which a claim of confidentiality is made will be safeguarded according to EPA 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). 3(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**

##### **4(a) Respondent/NAICS Codes**

Respondents to this information collection are manufacturers, distributors, and importers of aerosol coatings. These regulated entities fall within the North American Industry Classification System (NAICS) Code 32551, "Paint and Coating Manufacturing" and NAICS Code 325998 "All Other Miscellaneous Chemical Production and Preparation Manufacturing".

##### **4(b) Information Requested**

- (i) Data items. Beginning January 1, 2009, regulated entities are required to maintain records of the following at the location specified in §59.511 (a) (4) for each product subject to the product-weighted reactivity limits:

###### Recordkeeping

- Product category;
- All product calculations;
- The product-weighted reactivity;

- Weight fraction of all ingredients including water, solids, each VOC, and any compounds assigned a reactivity factor of zero, as specified in §59.505.
- A copy of each notification submitted, the documentation supporting each notification, and a copy of the label for each product.

#### Reporting

- Initial report (including small quantity manufacturer exemption requests);
- Supplemental report;
- Variance application; and
- Triennial report.

(ii) Respondent activities. The respondent activities required for all manufacturers and importers of regulated products are listed in Tables 2 and 3. Both new and existing sources must read the rule and understand the rule requirements. Respondents must also submit notifications and supplemental reports according to the requirements specified in the rule. Respondents must submit triennial reports of formulation and usage data. Each source must maintain all applicable records for 5 years.

## **5. THE INFORMATION COLLECTED: AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

### **5(a) Agency Activities**

A list of Agency activities is provided in Table 4.

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

Reports submitted to the Agency and records maintained by the regulated entities may be tabulated and published for use in compliance and enforcement programs.

### **5(c) Small Entity Flexibility**

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

receive close scrutiny, EPA will give full consideration to the special needs of small manufacturers and importers.

#### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown in Table 2.

### **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

Tables 2 through 7 document the individual burden items for the recordkeeping requirements resulting from the proposed action. The individual burdens are expressed under standardized headings consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory. 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.

#### **6(a) Estimating Respondent Burden**

The total annual burden to industry in year 1 from these recordkeeping and reporting requirements of the proposed action is estimated to be 12,800 hours (Total Hours per Year from Table 2). The average burden for the first three years is estimated to be 12,500 hours.

#### **6(b) Estimating Respondent Costs**

- (i) Estimating Labor Costs. This ICR estimates labor costs based on the Bureau of Labor Statistics, National Occupational Employment and Wage Estimates, May 2007. The base technical labor rate used is \$34.00 per hour. This rate was derived from estimates for health and safety professionals for Occupational Code 17-2111. The wage was increased by 100 percent to account for the benefit packages and to account for overhead, which results in an estimated hourly wage of \$68 per hour. For several activities, we assumed a manager would complete certain tasks at a base rate of \$43.00 per hour. This rate was derived from estimates for general and operations managers, in Occupation Code 11-1204. The rate was increased by 100 percent to account for the benefit packages and to account for overhead (OAQPS Cost Manual), which results in an hourly wage rate of \$86 per hour.
- (ii) Estimating Capital/Startup and Operation and Maintenance Costs. No capital/startup and operation and maintenance costs are associated with this rulemaking.
- (iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs.

No capital/startup and operation and maintenance costs are associated with this rulemaking.

**6(c) Estimating Agency Burden and Cost**

Because the information collection requirements were estimated as an incidental part of the standard development, no costs can be attributed to the development of the information collection requirements, with the exception of the development of the reporting forms and database for the triennial reporting. Operational costs will be incurred by the Federal government for the data entry and quality assurance of the information submitted in the triennial reports. Examination of records to be maintained by the respondents will occur incidentally as a part of the periodic inspection of sources that is part of the EPA's overall compliance and enforcement program and is not attributable to this ICR. The only other costs that the Federal government will incur are costs associated with the review of reported information, as presented in Table 4.

Labor rates and associated costs are based on U.S. Office of Personnel Management, Salary and Wages, Salary Table 2008-RUS, resulting in the following labor rates: management (GS15 - \$59); technical (GS13 - \$42); and clerical (GS7 - \$20). The number of management hours is assumed to equal 5 percent of the number of technical hours; the number of clerical hours is

assumed to equal 1 percent of the number of technical hours.  
(See Table 4.)

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

The following assumptions were used to determine the respondent universe and total burden and costs for industry to comply with the various requirements of the rule:

- The total number of regulated entities in Year 1 will be 60.
  - o Assumes 10 percent of respondents will request a variance;
  - o Assumes each respondent will have one incident per year that will require supplemental reporting (also referred to as a “notice of change” report).
- Total number of respondents in Year 2 will be 61 and in Year 3 will be 62.
  - Same 10% requesting a variance;
  - Assumes each respondent will have once incident per year that will require supplemental reporting;
- Assumes each respondent will maintain records on 37 formulations (average for industry);
- Assumes each respondent will submit a triennial report of formulations and VOC usage.

## **6(e) Bottom Line Burden Hours and Cost Tables**

### **(i) Respondent Tally**

The bottom line respondent burden hours and cost for year 1, presented in Table 2, are calculated by summing all total costs for the reporting activities and the total costs for the recordkeeping activities. The annual burden and costs are 12,189 hours and \$862,764. The average respondent burden equals the total burden (12,189) divided by the number of respondents (60), or about 203 hours per respondent; and the total average cost per respondent equals the total cost (\$862,764) divided by the total number of respondents (60), or about \$14,380.

The bottom line respondent burden hours and cost for year 2 and Year 3, presented in Tables 2 and 3, respectively, are calculated by summing all total costs for the reporting activities and the total costs for the recordkeeping activities. The annual average burden and costs for the first 3 years are 12,100 hours and \$857,331. The annual average burden equals the sum of the burden hours in Years 1 (12,189), 2(8359), and 3 (15,818), divided by 3. The average costs equals the sum of the average costs in Years 1

(862,764), 2(578,545), and 3 (1,130,685), divided by 3.

The average burden hours per respondent equals the total average burden (12,100) divided by the average number of respondents (61), or about 199 hours per respondent. The total average cost per respondent equals the total average cost (\$857,331) divided by the total respondents (61), or about \$14,000.

(ii) Agency Tally

The bottom line Agency burden and costs are presented in Tables 4 through 7. For year 1, the annual number of management hours is estimated to be 59 hours at \$118.00 per hour; the annual number of technical hours is estimated to be 1176 hours at \$84.00 per hour; and the annual number of clerical hours is estimated to be 12 hours at \$40.00 per hour. The total number of occurrences is estimated at 135, an estimate that includes completion of an initial report and supplemental report by each of the 60 regulated entities, plus a 10% variance application rate and an estimated 9 requests from EPA for additional information from a regulated entity. Total annual Agency burden for year 1 is estimated to be 1247 hours and \$106,200.

The bottom line Agency burden and costs for year 2 and year 3 are presented in Tables 5 and 6. The annual number of management hours averaged over the first 3 years is estimated at 62 hours and \$118.00 per hour; the annual average number of technical hours is estimated at 1240 hours and \$84.00 per hour; and the annual number of clerical hours is estimated at 12 hours and \$40.00 per hour.

(iii) Variations to the annual bottom line.

The EPA anticipates that the annual burden after Year 3 will be equal to the burden in Year 2 for 2 of every 3 years and equal to Year 3 for 1 of every 3 years.

#### **6(f) Reasons for Change in Burden**

The year 1 burden estimate includes an initial number of respondents that will be required to perform recordkeeping and reporting activities. Year 2 and beyond assumes 1 additional initial and supplemental reports will be required to be completed due to new aerosol coating product formulations being introduced into the market, or changes in existing aerosol coatings formulations. Year 2 and beyond burden estimates assume regulated entities will not require the level of management oversight required in year 1, due to experience gained by the technical staff. Therefore, less management hours

are included in each of the annual burden estimates for year 2 and beyond. Beginning in Year 3, triennial reports will be submitted, increasing the burden for those years where a report is due.

#### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 200 hours per respondent in year 1 and an average of 197 hours per respondent in the first 3 years. 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. EPA-HQ-OAR-2006-0971, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. 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 and Radiation Docket is (202) 566-1742. An electronic version of the public docket is available at [www.regulations.gov](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 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, D.C. 20503, Attention: Desk Officer

for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2006-0971 and OMB Control Number 2060-NEW in any correspondence.



Table 2. Industry Recordkeeping and Reporting Costs Year 1

Burden Item	(A)		(B)		(C)		(D)		(E)		Total
	Person Hours per Occurrence	N O T E S	Number of Occurrences per Respondent per Year	N O T E S	Person Hours per Respondent per Year	Dollars per Hour	N O T E S	Respondents per	N O T E S	Total Hours per Year	
<b>Reporting</b>											
Read instructions	4	a	1		4	86	b	60		240	20,640
Gather information	4	c	1		4	68		60		240	16,320
Initial report (incl. small quantity manufacturers)	25.25	c	1		25.25	68		60		1515	103,020
Supplemental report	4	h	1		4	68		60		240	16,320
Variance or compliance extension application	24	d	1		24	86		6	d	144	12,384
Responding to EPA request for data	60	i	1		60	86		9		540	46,440
<b>Recordkeeping</b>											
Read instructions	(above)										
Plan activities	16		1		16	86		60		960	82,560
Initial calculation of reactivity	0.5	e	37	f	18.5	68		60		1110	75,480
Maintenance of batch information	0.25	g	481		120	68		60		7200	489,600
<b>Total Industry Burden-</b> complying with rule										12045	\$850,380
Additional Burden-variance											\$12,384
<b>TOTAL INDUSTRY BURDEN- Year 1</b>										<b>12189</b>	<b>\$862,764</b>

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NOTES

200.75

a- Hour estimate includes reading and understanding compliance requirements of rule

b- Managerial \$/hr used since this is first national reactivity based rule- provides for conservatively high burden estimate

Average cost per respondent \$14,379.40

c- Includes hours to gather results of reactivity calculations and other data needed to complete the initial report. Assumes that each company has one event per year that requires them to submit a supplemental report. See 6b for calculation of rates

d- Hours to prepare variance request or request for compliance extension (for facilities who have not previously met CA limits). Assumes that 10 percent of facilities will request a variance. This is far higher than the experience in California, where only one variance was requested. The burden to gather information on coatings is still included in this estimate since those activities may still be conducted before the decision is made.

e- Assumed one-half hour average for each formulation. First few may take more than a half hour, but significantly less time is expected for subsequent calculations since a spreadsheet would likely be developed.

f- 2238 total formulations divided by 60 known manufacturers for an average of 34 formulations per manufacturer. Small businesses are likely to have fewer formulations.

g- While maintenance of limited batch information is required by the rule, all information is expected to be maintained in the absence of this rule. Assume that there is an average of one batch per week of each formulation and that 25% of the time, the facility must recalculate to verify that they remain below limits. Since these are recalculations of existing formulations, assume that it takes only 15 minutes per calculation to complete.

h- Assumes each facility will need to submit an average of one "notice of change" report per year, on the average, due to change in products produced or contact information. Includes time to prepare report and obtain signature of responsible official

i- Assumes 10 percent of facilities receive request. Includes hours to gather required records (already maintained), assemble information, gather any missing data, develop any desired summary and/or correspondence.

Table 3. Industry Recordkeeping and Reporting Costs Year 2

Burden Item	(A)		(B)		(C)		(D)		(E)		
	Person Hours per Occurrence	Notes	Number of Occurrences per Respondent per Year	Notes	Person Hours per Respondent per Year	Dollars per Hour	Notes	Respondents per Year	Notes	Total Hours per Year	Total  Cost in Year 1 (\$)
					(C=AxB)			Year		(E=CxD)	
<b>Reporting</b>											
Read instructions	4		1		4	86		1	a	4	344
Gather information	4		1		4	68		1	a	4	272
Initial report (incl. small quantity manufacturers)	25.25		1		25.25	68		1	b	25.25	1,717
Supplemental report	4		1		4	68		61		244	16,592
Variance or compliance extension application	24		1		24	86		0.1	a	2.4	206
Responding to EPA request for data	60		1		60	86		9		540	46,440
<b>Recordkeeping</b>											
Read instructions	(above)										
Plan activities	16		1		16	86		1	a	16	1,376
Calculation of reactivity	0.5	c	37	d	18.5	68		11	b	203.5	13,838
Maintenance of batch information	0.250	e	481		120	68		61	f	7320	497,760
<b>Total Industry Burden- complying with rule</b>										8356.75	\$578,339
<b>Additional Burden- variance</b>											\$ 206
<b>TOTAL INDUSTRY BURDEN- Year 2 and on</b>										<b>8359.15</b>	<b>\$578,545</b>

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NOTES:

	Average for second year of existing manufacturer	125	
a- Assumes up to 1 new aerosol coating manufacturers each year. Same 10% requesting variance	Average in Year 2 for new manufacturer (same as Year 1 for existing)	192	
b- Assumes 10 manufacturers add new coating category each year	Average cost per respondent	134.8	\$9,484.3
c- Same average time for calculating formulations for new category.			5
d- Uses average of all existing manufacturers. Likely to be an overestimate for both new manufacturers and for existing manufacturers adding a new coating category			
e- Same estimate as Year 1 for existing manufacturers.			
f- 60 existing manufacturers plus 1 new			

Table 4. Respondent Cost in Year 3 and Average for First 3 Years

Burden Item	(A)		(B)		(C)		(D)		(E)		Total Cost in Year 1 (\$)
	Person Hours per Occurrence	N O T E S	Number of Occurrences per Respondent per Year	N O T E S	Person Hours per Respondent per Year  (C=AxB)	Dollars per Hour	N O T E S	Respondents per Year	N O T E S	Total Hours per Year  (E=CxD)	
<b>Reporting</b>											
Read instructions	4		1		4	86		1	a	4	344
Gather information	4		1		4	68		1	a	4	272
Initial report (incl. small quantity manufacturers)	25.25		1		25.25	68		1	b	25.25	1,717
Supplemental report	4		1		4	68		62		248	16,864
Variance or compliance extension application	24		1		24	86		0.1	a	2.4	206
Responding to EPA request for data	60		1		60	86		9		540	46,440
<b>For triennial report</b>											0
Establish account for NEI	2		1		2	68		62		124	8,432
Enter general information into database	0.5		1		0.5	68		62		31	2,108
Enter product formulations into database	0.25		37		9.25	68		62		573.5	38,998
Enter company wide volumes of coating constituents into database	2		1		2	68		62		124	8,432

<b>Recordkeeping</b>										
Read instructions	(above)									
Plan activities	16		1		16	86	2	a	32	2,752
Calculation of reactivity	0.5	c	37	d	18.5	68	12	b	222	15,096
Maintenance of batch information	0.250	e	481		120	68	62	f	7440	505,920
<b>For triennial report</b>										
Calculate company wide volume usage of coating constituents	56	g	1		56	68	62	f	3472	236,096
QA/QC and review	40	h	1		40	86	62	f	2480	213,280
Read instructions/take training for reporting- support	4		1		4	68	62	f	248	16,864
Read instructions/take training for reporting- management	4		1		4	68	62	f	248	16,864
<b>Total Industry Burden- complying with rule</b>									15815.75	\$ 1,130,479
<b>Additional Burden- variance</b>										\$ 206
<b>TOTAL INDUSTRY BURDEN- Year 2 and on</b>									<b>15818.15</b>	<b>\$1,130,685</b>

NOTES:

a- Assumes up to 2 new aerosol coating manufacturers in first 2 years (added both in Year 2). Same 10% requesting variance

b- Assumes 10 manufacturers add new coating category each year

c- Same average time for calculating formulations for new category.

d- Uses average of all existing manufacturers. Likely to be an overestimate for both new manufacturers and for existing manufacturers adding a new coating category

e- Same estimate as Year 1 for existing manufacturers.

f- 60 existing manufacturers plus 1 new

g- Assumes 2 days to gather information and 2.0 hours to sum all information for each constituent- assumes an average of 20 different constituents used by facility

h- assumes review of all information by senior official of company

Average cost per respondent	255.1	\$18,236.86	
Average cost for triennial report per respondent	117.75		8727

			Total Year Costs
Average Cost for Year 1	200.8	\$14,379	\$ 862,764
Average Cost for Year 2	134.8	\$9,484	\$ 578,545
Average Cost for Year 3	255.1	\$18,236	\$1,130,685
Average of first 3 years	196.9	\$14,033	\$857,331

Table 5. Government Recordkeeping & Reporting Costs Year 1

	(A)	(B)	(C)	(D)	(E)	(F)	(G)
Burden Item	Person Hours per Occurrence	Number of Occurrences per Respondent per Year	Person Hours per Year @ \$84 (Technical) (C=AxB)	Person Hours per Year @ \$118 (Management) (D = C x 0.05)	Person Hours per Year @ \$40 (Clerical) (E = C x 0.01)	Total Person Hours per Year (F=C+D+E)	Total Cost Per Year (\$)
Initial report	8	60	480	24	4.8	508.8	43,344
Supplemental report	4	60	240	12	2.4	254.4	21,672
Variance application	16	6	96	4.8	0.96	101.76	8,669
Supplemental data request	40	9	360	18	3.6	381.6	32,508
<b>Total Government Burden</b>		135	1176	58.8	11.76	1246.56	\$ 106,193

Table 6. Government Recordkeeping & Reporting Costs Year 2

	(A)	(B)	(C)	(D)	(E)	(F)	(G)
Burden Item	Person Hours per Occurrence	Number of Occurrences per Respondent per Year	Person Hours per Year @ \$84 (Technical) (C=AxB)	Person Hours per Year @ \$118 (Management) (D = C x 0.05)	Person Hours per Year @ \$40 (Clerical) (E = C x 0.01)	Total Person Hours per Year (F=C+D+E)	Total Cost Per Year (\$)
Initial report	8	1	8	0.4	0.08	8.48	722
Supplemental report	4	61	244	12.2	2.44	258.64	22,033
Variance application	16	1	16	0.8	0.16	16.96	1,445
Supplemental data request	40	9	360	18	3.6	381.6	32,508
<b>Total Government Burden</b>		72	628	31.4	6.28	665.68	\$ 56,708

Table 7. Government Burden Year 3 - and Average for First 3 Years

Burden Item	(A)	(B)	(C)	(D)	(E)		Total Cost Per Year (\$)
	Person Hours per Occurrence	Number of Occurrences per Respondent per Year	Person Hours per Year @ \$84 (Technical) (C=AxB)	Person Hours per Year @ \$118 (Management) (D = C x 0.05)	Person Hours per Year @ \$40 (Clerical) (E = C x 0.01)	Total Person Hours per Year (F=C+D+E)	
Initial report	8	1	8	0.4	0.08	8	\$ 722
Supplemental report	4	62	248	12.4	2.48	263	\$ 22,394
Variance application	16	1	16	0.8	0.16	17	\$ 1,445
Develop Database and Report Forms for triennial report	300	1	300	15	3	318	\$ 27,090
Populate Database for triennial report	12	62	744	37.2	7.44	789	\$ 67,183
QA/Review data for triennial report	600	1	600	30	6	636	\$ 54,180
<b>Total Government Burden</b>		128	1916	95.8	19.16	2,031	\$ 173,015
					Year 1	1246.56	106,193
					Year 2	665.68	56,708
					Year 3	2031	173,015
					3 Yr. Average	1314.4	111,972