

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal), EPA ICR Number 1157.12, OMB Control Number 2060-0073.

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

The New Source Performance Standards (NSPS) for Flexible Vinyl and Urethane Coating and Printing were proposed on January 18, 1983, promulgated on June 29, 1984, and amended on October 17, 2000. These regulations apply to facilities with rotogravure printing lines used to print or coat flexible vinyl or urethane products for which construction, modification or reconstruction commenced after January 18, 1983. This information is being collected to assure compliance with 40 CFR Part 60, Subpart FFF.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents, and retain the file for at least two years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency's (EPA) regional offices.

The "Affected Public" are owners or operators of flexible vinyl and urethane coating and printing facilities. The "burden" to the Affected Public may be found below at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal). The "burden" to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and can be found below at the end of this document in Table 2: Average Annual EPA Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal).

Based on our consultations with industry representatives, there are an average of 41 affected facilities at each plant site and each plant site has only one respondent (i.e., the

owner/operator of the plant site).

Over the next three years, approximately 41 respondents per year will be subject to these standards, and one additional respondent per year will become subject to these same standards over the three years. There is an increase in the number of respondents from the prior ICR, based on a review of sources reported in the Agency's Integrated Compliance Information System (ICIS).

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

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

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

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.  
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years.

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

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

In the Administrator's judgment, VOC emissions from flexible vinyl and urethane

coating and printing facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart FFF.

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

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

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

The notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the standard is being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

### **3. Non-duplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart FFF.

#### **3(a) Non-duplication**

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

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

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (83 FR 24785) on May 30, 2018. No comments were received on the burden published in the *Federal Register* for this renewal.

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

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 41 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standard as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both: 1) the Wallcoverings Association, at (312) 321-5166; and 2) the Chemical Fabrics and Film Association (CFFA), at (216) 241-7333.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

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

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

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

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

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

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

### 3(g) Sensitive Questions

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

## 4. The Respondents and the Information Requested

### 4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are facilities with rotogravure printing line(s) used to print or coat flexible vinyl or urethane products. The United States Standard Industrial Classification (SIC) codes and their corresponding North American Industry Classification System (NAICS) codes for the source category are provided below.

<b>Standard (40 CFR Part 60, Subpart FFF)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Fabric Coating Mills	2295	313320
Coated and Laminated Paper Manufacturing	2679	322222
All Other Converted Paper Product Manufacturing	2679	322299

### 4(b) Information Requested

#### (i) Data Items

In this ICR, all the data that are recorded or reported is required by the NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF).

A source must make the following reports:

<b>Notifications</b>	
Notification of construction/reconstruction	§60.7(a)(1)
Notification of physical or operational change	§60.7(a)(4)
Notification of initial performance test	§§60.8(d), 60.7(a)(6), 60.7(a)(7)
Notification of delay and reschedule of initial performance test	§60.8(d)
Notification of demonstration of continuous monitoring system performance	§60.7(a)(5)

<b>Reports</b>	
Results of performance tests	§§60.8(a), 60.585(a)
Semiannual reports	§§60.7(c), 60.7(d), 60.585(b)

A source must keep the following records:

<b>Recordkeeping</b>	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	§§60.7(b), 60.584(d)
Records for sources with continuous monitoring systems	§§60.7(f)(1), 60.7(f) (2)
Records of all measurements	§§60.7(f), 60.583(b), 60.583(c)
Records of performance test conditions	§60.8(c)
Records of operating conditions for control equipment (i.e., temperature or VOC concentration)	§§60.584(a)(2), 60.584(b)(2), 60.584(c)(2)

### Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for VOC concentration or temperature.

<b>Respondent Activities</b>
Perform initial performance test, Reference Method 24, 25, 1, 2, 3, and 4 test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

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

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

<b>Agency Activities</b>
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

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

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard and to note the operating conditions under which compliance was achieved.

Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

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

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

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

The majority of the respondents are large entities (i.e., large businesses). Based on a small entity impact analysis conducted by EPA during rule development (see background information document: EPA-450/3-81-016a), the number of small entities potentially subject to the requirements of this ICR is estimated to be five percent of the respondent universe, or one facility.

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

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

The specific frequency for each information collection activity within this request is shown below, at the end of this document, in Table 1: Annual Respondent Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal).

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

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

The Agency may neither conduct nor 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 average annual burden to industry over the next three years from these record-keeping and reporting requirements is estimated to be 1,310 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulations, Agency knowledge and experience with the NSPS program, the previously-approved ICR, and any comments received.

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

#### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$147.40 (\$70.19+ 110%)
Technical	\$117.92 (\$56.15 + 110%)
Clerical	\$57.02 (\$27.15 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

#### **(ii) Estimating Capital/Startup and Operation and Maintenance Costs**

The type of industry costs associated with the information collection activities in the subject standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

#### **(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs**

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Temperature or feed rate monitor	\$20,000	0.33	\$6,600	\$9,000	41	\$369,000

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

The total capital/startup costs for this ICR are \$6,600. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$369,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$376,000. These are the recordkeeping costs.

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

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

The average annual Agency cost during the three years of the ICR is estimated to be \$9,560.

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

Managerial	\$65.71 (GS-13, Step 5, \$41.07 + 60%)
Technical	\$48.75 (GS-12, Step 1, \$30.47 + 60%)
Clerical	\$26.38 (GS-6, Step 3, \$16.49 + 60%)

These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear below at the end of this document in Table 2: Average Annual EPA Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately

40 (rounded) existing respondents will be subject to these standards. It is estimated that an additional one respondent per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 41 (rounded) per year.

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

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0.33	40	0	0	40.33
2	0.33	40.33	0	0	40.66
3	0.33	40.66	0	0	41
Average	0.33	40.33			40.66

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 41 (rounded).

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	0.33	1	0	0.33
Notification of initial performance test	0.33	1.2	0	0.40
Semiannual Reports	41	2	0	82
			<b>Total</b>	<b>83</b>

The number of Total Annual Responses is 83 (rounded).

The total annual labor costs are \$149,000. Details regarding these estimates may be found

below at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal).

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

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown below in Tables 1 and 2 at the end of this document, respectively, and summarized below.

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

The total annual labor hours are 1,310 hours (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal).

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

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$376,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

#### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 201 labor hours at a cost of \$9,560; see below in Table 2: Average Annual EPA Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal).

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

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

There is an adjustment increase in the change in burden in this ICR compared to the previous renewal. This is due to two considerations: 1) there has been an increase in the

estimated number of respondents from the prior ICR, based on a review of sources reported in the Agency's Integrated Compliance Information System (ICIS); and 2) the increase in the number of respondents also results in an increase in the operation and maintenance costs. Growth in the industry is anticipated to remain consistent at one respondent over the three-year period of this ICR, therefore there are no changes to the capital or startup costs.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 hours per response. 'Burden' means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2012-0657. An electronic version of the public docket is available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC 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) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2012-0657 and OMB Control Number 2060-0073 in any correspondence.

### **Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this

information.

**Table 1: Annual Respondent Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal)**

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year	Respondents per year <sup>a</sup>	Technical hours per year	Management hours per year	Clerical hours per year	Total cost per year
			(AxB)		(Cx D)	(Ex0.05)	(Ex0.10)	
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with rule requirement <sup>c</sup>	1	1	1	41	41	2.05	4.10	\$5,370.67
B. Required Activities								
New Sources								
Initial performance test <sup>d</sup>	280	1	280	0.33	92.4	4.62	9.24	\$12,103.66
Repeat performance test <sup>d, e</sup>	280	0.2	56	0.33	18.48	0.92	1.85	\$2,420.73
C. Create Information	See 3B							
D. Gather Existing Information	See 3B							
E. Write Report								
New Sources								
Notification of construction/reconstruction <sup>f</sup>	2	1	2	0.33	0.66	0.03	0.07	\$86.45
Notification of initial performance test <sup>e, g</sup>	2	1.2	2.4	0.33	0.792	0.04	0.08	\$103.75
Report of initial performance test	See 3B							
Existing Sources								
Semiannual report <sup>h</sup>	4	2	8	41	328	16	33	\$42,965.38
<b>Subtotal for Reporting Requirements</b>						<b>554</b>		<b>\$63,050.64</b>
4. Recordkeeping Requirements								
A. Familiarize with rule requirement	See 3A							
B. Plan Activities	See 3B							
C. Implement Activities	See 3B							

D. Develop Record System	N/A							
E. Time to Enter Information								
Records of startup, shutdown, and malfunctions <sup>i</sup>	1.5	2	3	41	123	6.15	12.30	\$16,112.02
Records of VOC, temperature, and CMS maintenance <sup>j</sup>	0.25	52	13	41	533	26.65	53.30	\$69,818.74
F. Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>754</b>		<b>\$85,930.75</b>
<b>TOTAL LABOR BURDEN AND COSTS (rounded)<sup>k</sup></b>						<b>1,310</b>		<b>\$149,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>k</sup></b>								<b>\$376,000</b>
<b>GRAND TOTAL<sup>k</sup></b>								<b>\$525,000</b>

## Assumptions:

- <sup>a</sup> We estimate that there are an average of 41 existing respondents, and it is estimated that one additional source will become subject over the next three years of this ICR.
- <sup>b</sup> This ICR uses the following labor rates: \$117.92 for technical, \$147.40 for managerial, and \$57.02 for clerical labor. These rates are from the U.S. Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- <sup>c</sup> We estimate it will take one hour to read and familiarize with the rule. This burden item applies to all sources.
- <sup>d</sup> We estimate each performance test will take 280 hours to complete.
- <sup>e</sup> We estimate 20 percent of respondents will need to repeat the initial performance test.
- <sup>f</sup> We estimate it will take 2 hours to prepare the notification of construction/reconstruction.
- <sup>g</sup> We estimate it will take 2 hours to prepare the notification of initial performance test.
- <sup>h</sup> We estimate it will take 4 hours to compile data for semiannual reports.
- <sup>i</sup> We estimate it will take 1.5 hours to record startups, shutdowns, and malfunctions.
- <sup>j</sup> We estimate it will take 0.25 hours to record VOCs, temperatures, and CMS maintenance.
- <sup>k</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 2: Average Annual EPA Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal)**

Burden Item	A	B	C	D	E	F	G	H
	Person hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year	Respondents per year <sup>a</sup>	Technical person hours per year	Management person-hours per year	Clerical person-hours per year	Total cost per year
			(C=AxB)		(Cx D)	(Ex0.05)	(Ex0.10)	(\$) <sup>b</sup>
Required Activities								
New Sources								
Initial performance tests <sup>c</sup>	24	1	24	0.33	7.92	0.40	0.79	\$433.01
Repeat performance tests <sup>c, d</sup>	24	0.2	4.8	0.33	1.58	0.08	0.16	\$86.60
Report Review								
New Sources								
<sup>e</sup> Notification of construction/reconstruction	2	1	2	0.33	0.66	0.03	0.07	\$36.08
Notification of initial startup <sup>f</sup>	0.5	1	0.5	0.33	0.17	0.01	0.02	\$9.02
Notification of actual startup <sup>g</sup>	0.5	1	0.5	0.33	0.17	0.01	0.02	\$9.02
Notification of initial test <sup>d, h</sup>	0.5	1.2	0.6	0.33	0.20	0.01	0.02	\$10.83
Review test results <sup>d, i</sup>	0.5	1.2	0.6	0.33	0.20	0.01	0.02	\$10.83
Existing Sources								
Semiannual reports <sup>j</sup>	2	2	4	41	164	8.20	16.40	\$8,966.45
<b>TOTAL COST (rounded)<sup>k</sup></b>						<b>201</b>		<b>\$9,560</b>

## Assumptions:

<sup>a</sup> We estimate that an average of 41 existing respondents, and it is estimated that one additional source will become subject over the next three years of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$48.75 for technical, \$65.71 for managerial, and \$26.38 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

- <sup>c</sup> We estimate it will take 24 hours to participate with each performance test.
- <sup>d</sup> We estimate 20 percent of respondents will need to repeat the initial performance test.
- <sup>e</sup> We estimate it will take 2 hours to review construction/reconstruction notifications.
- <sup>f</sup> We estimate it will take 0.5 hours to review initial startup notifications.
- <sup>g</sup> We estimate it will take 0.5 hours to review actual startup notifications.
- <sup>h</sup> We estimate it will take 0.5 hours to review initial test notifications.
- <sup>i</sup> We estimate it will take 0.5 hours to review test results.
- <sup>j</sup> We estimate it will take 2 hours to review each semiannual report twice annually.
- <sup>k</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.