

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ)  
(Proposed Amendments)**

**August 2019**

**Part A of the Supporting Statement**

**1. Identification of the Information Collection**

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

NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Proposed Amendments), EPA ICR Number 1951.07, OMB Control Number 2060-0511.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating were proposed on September 13, 2000, and promulgated on December 4, 2002. These regulations apply to new and existing paper and other web coating facilities that include web coating lines engaged in the coating of metal webs used in flexible packaging, and web coating lines engaged in the coating of fabric substrates for use in pressure sensitive tape and abrasive materials. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart JJJJ. Amendments to the NESHAP are being proposed as a result of the residual risk and technology review (RTR) required under the Clean Air Act (CAA) (as discussed further below).

In general, all NESHAP 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 failures to meet applicable standards, 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 NESHAP.

Any owner/operator subject to the provisions of 40 CFR Part 63 shall maintain a file containing these documents and retain the file for at least 5 years following the date of such 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 (EPA) regional office.

The proposed RTR amendments to the rule would eliminate the startup, shutdown, and malfunction (SSM) exemption; remove the SSM plan requirement; add periodic performance testing; add electronic submittal of notifications, semiannual reports and performance test reports; and make technical and editorial changes. The remaining portions of the NESHAP would remain unchanged.

The “Affected Public” includes owners and operators of paper and other web coating facilities. The ‘burden’ to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Proposed Amendments). The ‘burden’ to the “Federal Government” is attributed entirely to work performed by either Federal employees or government contractors and can be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Proposed Amendments). All the paper and other web coating facilities in the United States are owned and operated by the paper and other web coating industry. None of the facilities in the United States are owned by state, local, tribal or the Federal government. They are privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next 3 years, an average of approximately 169 existing respondents per year will be subject to these standards, and 1 additional new respondent per year will become subject to these same standards (for an average total of 170 respondents per year). The respondent universe and growth rate are based on estimates from the previous ICR renewal and the EPA’s recent reevaluation of the source category inventory, which indicated that several facilities have shut down since the last ICR renewal period.

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**

Section 112 of the CAA requires the EPA to establish NESHAP for major sources of HAP that are listed for regulation under CAA section 112(c). A major source is a stationary source that emits or has the potential to emit more than 10 tpy of any single HAP or more than 25 tpy of any combination of HAP. For major sources, the NESHAP includes technology-based standards that must reflect the maximum degree of emission reductions of HAP achievable (after considering cost, energy requirements, and non-air quality health and environmental impacts). The NESHAP are commonly referred to as maximum achievable control technology (MACT) standards. In the Administrator's judgment, organic HAP from paper and other web coating facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP standards were promulgated for this source category at 40 CFR Part 63, Subpart JJJJ in 2002.

Section 112(d)(6) of the CAA requires the EPA to review the technology-based MACT standards and revise them “as necessary (taking into account developments in practices,

processes, and control technologies)” no less frequently than every 8 years. In addition, section 112(f) of the CAA requires the EPA to determine whether the MACT emissions limitations provide an ample margin of safety to protect public health. For MACT standards for HAP “classified as a known, probable, or possible human carcinogen” that “do not reduce lifetime excess cancer risks to the individual most exposed to emissions from a source in the category or subcategory to less than 1-in-1 million,” the EPA must promulgate residual risk standards for the source category (or subcategory) as necessary to provide an ample margin of safety to protect public health. In doing so, EPA may adopt standards equal to existing MACT standards, if the EPA determines that the existing standards are sufficiently protective. The EPA must also adopt more stringent standards, if necessary, to prevent an adverse environmental effect, but must consider cost, energy, safety, and other relevant factors in doing so.

Certain records and reports are necessary for the Administrator to confirm the compliance status of sources subject to NESHAP, 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 CAA (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions (40 CFR Part 63, Subpart A). CAA section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

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

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

The control of emissions of HAP from paper and other web coating facilities requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of HAP from these sources are the result of operation of the affected sources.

The standards are achieved by the reduction of pollutant emissions using process changes and control technology. The notifications required in the 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

standards are being met.

Performance test reports are needed, as these are the Agency's record of a source's initial and ongoing capability to comply with the emission standards and serve as a record of the operating conditions under which compliance was achieved. The semiannual reports are used for problem identification, as a check on source operation and maintenance and for compliance determinations.

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate their control equipment and achieve continuous compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the CAA. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

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

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart JJJJ.

#### **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**

This section is not applicable because this is a rule-related ICR. Nevertheless, the ICR will be available for public review during the public comment period following publication of the proposed RTR amendments to Subpart JJJJ in the *Federal Register*.

#### **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 3 years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Enforcement and Compliance History Online (ECHO) database. ECHO 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. The EPA's recent reevaluation of the source category inventory indicated that several facilities have shut down since the last ICR renewal period. An average of approximately 170 respondents will be subject to these standards over the 3-year period covered by this ICR, which includes an estimated 1 new respondent per year through the period.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as 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 the Flexible Packaging Association the Pressure Sensitive Tape Council, and the American Forest and Paper Association. Further stakeholder and public input is expected through public comment and follow-up meetings with interested stakeholders.

### **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 emission limitations are met. If the information required by these standards and the proposed RTR amendments 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 and the proposed RTR amendments do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least 5 years. This is consistent with the General Provisions as applied to the standards. The EPA believes that the 5-year records retention requirement is consistent with the Part 70 permit program and the 5-year statute of limitations on which the permit program is based. The retention of records for 5 years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond 5 years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records in the absence of the 5-year maintenance requirement.

### **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**

None of the reporting or recordkeeping requirements in these standards or the proposed RTR amendments contain sensitive questions.

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

### **4(a) Respondents/SIC Codes**

The respondents to the recordkeeping and reporting requirements and the proposed RTR amendments are paper and other web coating facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by these standards and for the corresponding North American Industry Classification System (NAICS) codes are listed below:

<b>Standard (40 CFR, Part 63, Subpart JJJJ)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Corrugated and Solid Fiber Box Manufacturing	2653	322211
Folding Paperboard Box Manufacturing	2657	322212
Paper Bag and Coated and Treated Paper Manufacturing	2671, 2672, 2673, 2674, 2675	322220
All Other Converted Paper Product Manufacturing	2675, 2679	322299
Commercial Printing (Except Screen and Books)	2754, 2761	323111
Unlaminated Plastics Film and Sheet (except Packaging) Manufacturing	3081	326113
Laminated Plastics Plate, Sheet (except packaging), and Shape Manufacturing	3083	326130
Abrasive Product Manufacturing	3291	327910
All Other Miscellaneous Fabricated Metal Product Manufacturing	3497	332999

#### 4(b) Information Requested

##### (i) Data Items

In this ICR, all the data that are recorded or reported are required by the NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJ) or would be required under the proposed RTR amendments. Subpart JJJ references 40 CFR Part 63, Subpart A for several general reporting and recordkeeping requirements that apply for all NESHAP.

A source must make the following notifications and reports:

<b>Notifications</b>	
Initial notifications	§§ 63.9(b), 63.3400(b)
Notification of performance test	§§ 63.7, 63.9(e), 63.3400(d)
Notification of compliance status (including electronic submittal of results of performance test, CMS performance evaluation, or other initial compliance demonstration)	§§ 63.9(h), 63.3400(e)

<b>Reports</b>	
Performance test report	§ 63.3400(f)
CMS performance evaluation report	§ 63.3400(g)
Semiannual report - deviations/out of control operation	§ 63.3400(c)
Semiannual compliance report – no deviations/out of control operation	§ 63.3400(c)

A source must keep the following records:

<b>Recordkeeping</b>	
Records to demonstrate compliance	§§ 63.10(b)(2), 63.3410(a)(1)
Records for each CMS	§ 63.3410(a)(2)
Records are required to be retained for five years	§ 63.10(b)(1)

## Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data (e.g., continuous control device parameter monitoring). Although personnel at the facilities still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. Most modern paper and other web coating facilities have integrated many of the compliance recordkeeping and reporting requirements into their systems. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically, which is reducing the reporting burden. As part of the RTR amendments, respondents would be required to use the EPA's Electronic Reporting Tool (ERT) to submit performance test reports for test methods supported by the ERT. Respondents would also be required to submit selected notifications and semiannual reports through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI).

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

The respondent activities required by Subpart JJJJ are listed in the following table:

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Perform initial performance test, Reference Method Reference Methods 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 24, 25, 25A tests, 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 the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of 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

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

<b>Agency Activities</b>
Observe performance tests and periodic performance tests.
Conduct excess emissions enforcement activities.
Review notifications and reports, including initial and periodic performance test reports, CMS performance evaluation reports, and semiannual compliance reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) database.

### 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 standards and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into the EPA's Enforcement and Compliance History Online (ECHO), which is operated and maintained by the EPA's Office of Enforcement and Compliance Assurance. ECHO is the EPA's database to provide integrated compliance and enforcement information for about 800,000 regulated facilities nationwide. The EPA uses ECHO 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. ECHO allows users (including the public) to search and obtain information on permits data, inspections, violations, enforcement actions, and penalties.

The records required by this regulation must be retained by the owner/operator for 5

years.

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

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation and its proposed RTR amendments. 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 in Table 1: Average Annual Respondent Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Proposed Amendments).

## **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 3 years from these recordkeeping and reporting requirements and the proposed RTR amendments is estimated to be 17,600 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, the EPA's recent reevaluation of the source category inventory, Agency knowledge and experience with the NESHAP 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, performance testing, and other compliance activities. The capital/startup costs are one-time costs when a facility becomes subject to the regulation, and include startup costs for CMS and the purchase of stack testing services. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s).

**(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)
Initial performance test (inlet/outlet)	\$28,000	1	\$28,000			
Continuous monitoring system (CMS)	\$10,000	1	\$10,000	\$25	84	\$2,100
Repeat performance test (inlet/outlet)	\$28,000	65	\$1.82M			
Continuous emission monitoring system (CEMS)	\$183,500	1	\$183,500	\$26,700	4	\$106,800
<b>Total cost (rounded)</b>			<b>\$2,040,000</b>			<b>\$109,000</b>

Note: Totals have been rounded to 3 significant digits. Permit data indicate 52% of the facilities (88 facilities) use add-on controls (79 use oxidizers and 9 use carbon adsorption). All of the oxidizers must use parametric monitoring, and it was assumed that 5 of the facilities using carbon adsorption do as well. The remaining 4 facilities using carbon adsorption were assumed to use CEMs. It was conservatively estimated that one new facility uses CEMs and the other new facility uses CMS. Permit data indicate that some oxidizers are already tested on a regular basis, therefore an estimated 65 will incur cost for repeat performance testing.

The total capital/startup costs for this ICR are \$2,040,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$109,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next 3 years of the ICR is estimated to be \$789,000.

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

The only costs to the Agency are those costs associated with analysis of the reported information. The 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 burden during the 3 years of the ICR is estimated to be 6,300 hours at a cost of \$297,000.

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 in Table 2: Average Annual EPA Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Proposed Amendments).

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

Based on our research for this ICR, on average over the next 3 years, approximately 169 existing respondents will be subject to these standards. It is estimated that an additional 1 respondent per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 170 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	1	168	0	0	169
2	1	169	0	0	170

Number of Respondents					
3	1	170	0	0	171
Average	1	169	0	0	170

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

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the 3 year period of this ICR is 170.

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

Total Annual Responses				
(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
Initial Notification	1	1	0	1
Notification of performance test	1	1	0	1
Notification of compliance status	1	1	0	1
Performance test reports	1	1	0	1
Periodic Testing of Oxidizers	22	1	0	22
CMS Performance Evaluation	22	1	0	22
Semiannual report	170	2	0	340
			<b>Total</b>	<b>388</b>

Note: Based on permits we assume that 88 facilities use add-on controls, with a total of 123 oxidizers and 18 carbon adsorption systems. Some permits already require periodic testing. It is estimated that 65 additional oxidizers will have to perform repeat testing under the proposed amendments, and that one-third of the required tests are done during each of the 3 years.

The number of Total Annual Responses is 388, all of which will be submitted electronically.

The total annual labor costs are \$2,000,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Proposed Amendments).

### 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, respectively, and summarized below.

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

The total annual labor hours are 17,600 hours at a cost of \$2,000,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Proposed Amendments).

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 45 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$789,000. 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 3 years is estimated to be 6,300 labor hours at a cost of \$297,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Proposed Amendments).

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

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

This ICR is prepared for proposed RTR amendments to the NESHAP for Paper and Other Web Coating Manufacturing (40 CFR, Part 63, Subpart JJJJ). These proposed RTR amendments would: (1) adjust references to the Part 63 General Provisions (40 CFR Part 63, Subpart A) and revise provisions in the NESHAP (40 CFR Part 63, Subpart JJJJ) to eliminate the SSM exemption and SSM plan requirement; (2) add periodic performance testing; (3) add electronic submittal of notifications, semiannual reports and performance test reports; and (4) make technical and editorial changes. Where applicable, adjustments for these proposed RTR amendments are reflected in Tables 1 and 2 of this ICR.

The number of affected facilities changed from the estimate in the 2018 ICR renewal request for comments due to updates to the number of affected facilities based on EPA's recent RTR efforts and subsequent updates from other information sources.

Costs per labor hour increased due to increases in the technical and clerical labor rates. In addition, the burden estimate for familiarizing with regulatory requirements was increased to reflect the actual time it would take industry to review the proposed amendments. Burden estimates were added for the industry to prepare for/attend periodic performance tests and record failures to meet standards and actions taken to minimize emissions. Burden estimates were removed for developing SSM plans and submitting periodic SSM reports.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 45 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-2014-0077. 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-2014-0077 and OMB Control Number 2060-0511 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 – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Proposed Amendments)**

	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
1. Reporting requirements								
A. Familiarization with regulatory requirements	8	1	8	170	1,360	68	136	\$178,142
B. Gather information <sup>c</sup>	4	4	16	1	16	0.8	1.6	\$2,096
C. Periodic Performance Testing <sup>d</sup>								
i. Notification of Performance Test	24	1	24	22	528	26	53	\$69,161
ii. Attend periodic performance test	10	2	20	22	440	22	44	\$57,634
D. Write reports								
i. Initial notification <sup>c</sup>	2	1	2	1	2	0.1	0.2	\$262
ii. Notification of performance test <sup>c</sup>	2	1	2	1	2	0.1	0.2	\$262
iii. Notification of compliance status <sup>c</sup>	2	1	2	1	2	0.1	0.2	\$262
iv. Performance test reports <sup>c</sup>	2	1	2	1	2	0.1	0.2	\$262
v. Notification of CMS performance evaluation <sup>d</sup>	2	1	2	22	44	2.2	4.4	\$5,763
vi. Semiannual summary report	4	2	8	170	1,360	68	136	\$178,142
<i>Subtotal for Reporting Requirements</i>						<b>4,319</b>		<b>\$491,985</b>
2. Recordkeeping requirements								
A. Read instructions <sup>c</sup>	4	1	4	1	4	0.2	0.4	\$524
B. Plan activities <sup>c</sup>	15	1	15	1	15	0.75	1.5	\$1,965
C. Implement activities for compliance coating use <sup>e,f</sup>	5	12	60	80	4,800	240	480	\$628,735

D. Implement activities for control devices and process equipment <sup>c</sup>								
i. Design analysis	12	1	12	1	12	0.6	1.2	\$1,572
ii. Performance test oversight	20	1	20	1	20	1	2	\$2,620
E. Develop record system								
i. Develop plan for material used <sup>e</sup>	10	1	10	80	800	40	80	\$104,789
ii. Control equipment and maintenance plan <sup>c</sup>	10	1	10	1	10	0.5	1	\$1,310
F. Time to enter information								
i. Compliance calculation <sup>e</sup>	2	12	24	80	1,920	96	192	\$251,494
ii. Control equipment testing <sup>f</sup>	1	1	1	90	90	4.5	9	\$11,789
iii. Records of failures to meet standards/actions taken to minimize emissions <sup>g</sup>	2	12	24	8.5	204	10.2	20.4	\$26,721
G. Time to train personnel								
i. Acquisition and installation <sup>c</sup>	15	1	15	1	15	0.75	1.5	\$1,965
ii. Equipment inspection and monitoring <sup>f</sup>	10	1	10	90	900	45	90	\$117,888
iii. Use of technology and systems <sup>h</sup>	10	1	10	170	1,700	85	170	\$222,677
H. Store, file and maintain records <sup>h</sup>	0.25	12	3	170	510	25.5	51	\$66,803
I. Retrieve records/reports <sup>h</sup>	0.25	12	3	170	510	25.5	51	\$66,803
<i>Subtotal for Recordkeeping Requirements</i>						<b>13,237</b>		<b>\$1,507,654</b>
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>i</sup></b>						<b>17,600</b>		<b>\$2,000,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>i</sup></b>								<b>\$789,000</b>
<b>GRAND TOTAL COST (rounded) <sup>i</sup></b>								<b>\$2,789,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 170. There are currently 168 facilities, and we have estimated there will be three additional new sources that will become subject to the rule over the 3-year period of the ICR (i.e., one per year).

<sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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 have assumed that this is a one-time activity for one new facility using a solvent recovery device.

<sup>d</sup> Periodic testing will be required for an additional 65 oxidizers, assume one-third per year ( $65/3 =$  approximately 22 per year)

<sup>e</sup> Based on permit data, we have assumed that 80 facilities comply with MACT through the use of compliant coatings and thus will record activities for compliance coating use.

<sup>f</sup> Based on review of permit data we have estimated that 88 facilities currently use add-on control equipment. Conservatively assuming each new facility added uses add-on controls, we assumed an average of 90 facilities with add-on control over the 3-year period. Thus, we have assumed that 90 facilities incur this cost.

<sup>g</sup> We have assumed that 5% of respondents will fail to meet standards each year ( $0.05 \times 170 = 8.5$ )

<sup>h</sup> We have assumed that 170 respondents will be involved in the storage, filing, maintenance and retrieval of records and reports twelve times per year.

<sup>i</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 – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Proposed Amendments)**

<b>Burden item</b>	<b>(A) Person hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>	<b>(C) Person hours per respondent per year (C=AxB)</b>	<b>(D) Respondents per year<sup>a</sup></b>	<b>(E) Technical person- hours per year (E=CxD)</b>	<b>(F) Management person- hours per year (Ex0.05)</b>	<b>(G) Clerical person hours per year (Ex0.1)</b>	<b>(H) Cost, \$<sup>b</sup></b>
1. Review initial notification <sup>c</sup>	8	1	8	1	8	0.4	0.8	\$437
2. Review notification of compliance status <sup>c</sup>	10	1	10	1	10	0.5	1	\$547
3. Review semiannual summary reports <sup>d</sup>	15	2	30	170	5,100	255	510	\$278,835
4. Review notification of initial performance test <sup>c</sup>	2	1	2	1	2	0.1	0.2	\$109
5. Review notification of periodic performance test and CMS performance evaluation <sup>e</sup>	4	1	4	22	88	4.4	8.8	4,811
6. Review initial test results <sup>c, g</sup>	10	1	10	1	10	0.5	1	\$547
7. Review periodic performance test and CMS performance evaluation results <sup>e, f</sup>	10	1	10	22	220	11	22	\$12,028
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>g</sup></b>					<b>6,300</b>			<b>\$297,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 170. There are currently 168, and it's estimated that 3 additional new sources will become subject to the rule over the 3-year period of the ICR (i.e., 1 per year)

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$65.71 for Managerial (GS-13, Step 5), \$48.75 for Technical (GS-12, Step 1), and \$26.38 Clerical (GS-6, Step 3). These rates are from the Office of Personnel Management (OPM) "2018 General Schedule" which excludes locality rates of pay.

<sup>c</sup> We have assumed that this is a one-time activity for each new facility.

<sup>d</sup> It is assumed that the agency will review summary reports twice per year.

<sup>e</sup> A total of 65 oxidizers will have periodic performance tests and CMS performance evaluations. For costing purposes, assume one-third per year (65/3 = 22)

<sup>f</sup> We have assumed that it will take the agency ten hours to review test results.

<sup>g</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.