

ICR Summary Information

Hours per Response	145
Number of Respondents	352
Total Estimated Burden Hours	59,800
Total Estimated Costs	\$7,590,000
Annualized Capital O&M	\$414,000
Total Annual Responses	412
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NESHAP for the Printing and Publishing Indust

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Surveys and studies	N/A		
3. Reporting requirements			
a. Familiarization with the regulatory requirements ^c	4	1	4
b. Required activities			
Initial performance test ^d	240	1	240
Repeat performance tests ^d	240	1	240
Install CMS ^d	100	1	100
Develop CMS/QC program and test plan ^d	100	1	100
Conduct CMS performance evaluation ^d	300	1	300
Maintain, adjust, and calibrate CMS ^e	6	52	312
c. Create information	See 3B		
d. Gather existing information	See 3E		
e. Write report			
New Sources			
Notification of initial and HAP usage ^d	4	1	4
Notification of compliance status ^d	4	1	4
Notification of performance test ^d	2	1	2
Report of performance test ^d	40	1	40
Existing Sources			
Startup, shutdown, malfunction report ^f	2	2	4
Semiannual excess emission and CMS performance report ^g	16	2	32
Subtotal for Reporting Requirements			
4 Recordkeeping requirements			
a. Familiarization with the regulatory requirements	See 3A		
b. Plan activities	N/A		
c. Implement activities	N/A		
d. Develop record system ^d	40	1	40
e. Time to enter information			
Records of maintenance ^h	4	52	208
Records of startup, shutdown, and malfunction ⁱ	2	52	104
Records of malfunction or inoperative CMS ⁱ	2	2	4
Records of applicability determination ^d	2	1	2
Records of CMS operation ^j	2	52	104
Records of liquid-liquid material balances; HAP, volatile material, solids and materials applied, operating parameters ^k	2	12	24
Records of materials used by incidental printers ^l	40	1	40
Records of HAP usage (area sources) ^{m,n}	0.5	12	6
f. Time to train personnel	See 3A		
g. Time for audits	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded) ^o			
Capital and O&M Cost (rounded): ^o			
TOTAL COST (rounded): ^o			

Assumptions:

- ^a We have assumed that the average number of respondents potentially subject to this rule is 352. Of the 352 facilities, 152 are subject to the rule during the three-year period of this ICR.
- ^b This ICR uses the following labor rates: \$157.61 (\$75.05 + 110%) per hour for Executive, Administrative, and Managerial labor; \$75.05 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2008, from column 1, "Total compensation." The rates have been increased by 110 percent to account for varying industry wage rates and benefits, including business expenses associated with hiring, training, and equipping their employees.
- ^c We have assumed that all facilities will take 4 hours to read and review instructions.
- ^d We have assumed that there will be no new sources during the three-year period of this ICR.
- ^e We have assumed that 30 percent of the 152 major source respondents (46 facilities) will be required to maintain, adjust, and update their records.
- ^f We have assumed that 20 percent of the 152 major source respondents (30 facilities) will have startup, shutdown, malfunction, or maintenance events.
- ^g We have assumed that 46 facilities are fitted with CMS control, and an additional 30 facilities that may encounter excess emissions events.
- ^h We have assumed that 105 facilities do not have CMS installed in them.
- ⁱ We have assumed that 20 percent of respondents (major source) will enter information on startup, shutdown, malfunction, or maintenance events.
- ^j We have assumed that 46 respondents (major source) will enter information on CMS operations.
- ^k We have assumed that 105 facilities do not have CMS installed in them.
- ^l We have assumed that 2 existing facilities will be required to enter information on records of materials used by incidental sources.
- ^m We have assumed that 200 area sources, which includes products and packaging rotogravure and wide-web flexographic printing, will be required to submit a monthly record of HAP usage to show that they are meeting the limit.
- ⁿ We have assumed that it will take each respondent 0.5 hours to record HAP usage.
- ^o Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ry (40 CFR Part 63, Subpart KK) (Renewal)

(D)	(E)	(F)	(G)	(H)
Respondents per year ^a	Technical person- hours per year	Management person hours per year	Clerical person hours per year	Total Cost
	(E=CxD)	(Ex0.05)	(Ex0.1)	Per year ^b
352	1,408	70.4	140.8	\$194,406.08
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
46	14,352	717.6	1,435.2	\$1,981,616.52
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
30	120	6	12	\$16,568.70
76	2,432	121.6	243.2	\$335,792.32
		21,059		\$2,528,383.62
0	0	0	0	\$0
105	21,840	1,092	2,184	\$3,015,503.40
30	3,120	156	312	\$430,786.20
30	120	6	12	\$16,568.70
0	0	0	0	\$0
46	4,784	239.2	478.4	\$660,538.84
				\$347,942.70
105	2,520	126	252	
2	80	4	8	\$11,045.80
200	1,200	60	120	\$165,687.00
		38,714		\$4,648,072.64
		59,800		\$7,180,000
				\$414,000
				\$7,590,000

Technical \$123.94
 Managerial \$157.61
 Clerical \$62.52

are major sources, and 200 are area sources. There will be no additional new sources over

al labor; \$123.94 (\$59.02 + 110%) per hour for Technical labor, and \$62.52 (\$29.77 + 110%)
er 2021, "Table 2. Civilian Workers, by occupational and industry group." The rates are
ates and the additional overhead business costs of employing workers beyond their wages and

and calibrate CMS.

tion incidents with equipment or inoperative CMS reports to complete.

missions.

problems with equipment or inoperative CMS.

printers.

printing presses, are subject to recordkeeping requirements, and are required to keep a

Table 2: Average Annual EPA Burden and Cost – NESHAP for the Printing and Publishing Industry

Activity	(A)	(B)	(C)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year
			(C=AxB)
Required activities			
New sources			
Initial performance tests ^c	24	1	24
Repeat performance tests ^c	24	1	24
Report review			
New sources			
Notification of initial startup ^c	2	1	2
Notification of compliance status ^c	4	1	4
Notification of performance test ^c	1	1	1
Review test results ^c	8	1	8
Existing sources			
Semiannual excess emissions and CMS performance report ^d	2	2	4
Periodic startup, shutdown, malfunction report ^e	2	1	2
TOTAL ANNUAL BURDEN AND COST (rounded) ^f			

Assumptions:

^a We have assumed that the average number of respondents potentially subject to this rule is 352. Of the 352 facilities, 1 source over the three-year period of this ICR.

^b This cost is based on the following hourly labor rates: \$70.56 (GS-13, Step 5, \$44.10 + 60%) for Managerial, \$52.37 (60% Clerical). These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which exclude benefit packages available to government employees.

^c We have assumed that there will be no new sources during the three-year period of this ICR.

^d We have assumed that 46 facilities are fitted with CMS control, and an additional 30 facilities that may encounter excess emissions.

^e We have assumed that 20 percent of 152 major sources (30 facilities) will be required to submit periodic startup, shutdown, and malfunction reports.

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

dustry (40 CFR Part 63, Subpart KK) (Renewal)

(D)	(E)	(F)	(G)	(H)
Plants per year ^a	Technical person- hours per year	Management person-hours per year	Clerical person-hours per year	Cost, \$ ^b
	(E=CxD)	(Ex0.05)	(Ex0.1)	
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
76	304	15.2	30.4	\$17,854.53
30	60	3	6	\$3,523.92
	419			\$21,400

Technical	\$52.37
Managerial	\$70.56
Clerical	\$28.34

52 are major sources, and 200 are area sources. There will be no additional new

GS-12, Step 1, \$32.73 + 60%) for Technical, and \$28.34 (GS-6, Step 3, \$17.71 +
 es locality rates of pay. The rates have been increased by 60 percent to account for the

ss emissions.
 own, malfunction report.

Capital/Startup vs. Operation and Maintenance			
(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents ^a	Total Capital/Startup Cost, (B X C)
Temperature ^a	\$7,000	0	\$0
Totals (rounded) ^b			\$0

^a This ICR assumes that 30 percent of respondents (major source), or 46 sources will be required to maintain,

^b Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

(O&M) Costs

(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M^b	Total O&M, (E X F)
\$9,000	46	\$414,000
		\$414,000

\$414,000

adjust, and calibrate CMS.

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ^a	Number of Existing Respondents ^b	Number of Existing Respondents that keep records but do not submit reports ^b	Number of Existing Respondents That Are Also New Respondents
1	0	152	200	0
2	0	152	200	0
3	0	152	200	0
Average	0	152	200	0

^a New respondents include sources with constructed and reconstructed affected facilities.

^b The 152 major sources submit reports and keep records, and 200 area sources that only keep records.

(E)
Number of Respondents (E=A+B+C-D)
352
352
352
352

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(B \times C)+D$
Notification of initial and HAP usage	0	1	0	0
Notification of compliance status	0	1	0	0
Notification of performance test	0	1	0	0
Report of performance test	0	1	0	0
Startup/shutdown/malfunction report	30	2	0	60
Semiannual excess emission and CMS performance report	76	2	0	152
Records of HAP usage (area source) ^a	0	0	200	200
			Total	412

^a Area sources keep records of HAP usage but do not submit reports.