

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for the Printing and Publishing Industry (40 CFR part 63, subpart KK)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for the Printing and Publishing Industry (40 CFR part 63, subpart KK) (Renewal)

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry were proposed on March 14, 1995 (60 FR 13664), and promulgated on May 30, 1996 (61 FR 27131). These standards apply to the following facilities in 40 CFR subpart KK: publication rotogravure, product and packaging rotogravure, and wide-web flexographic printing presses at major sources, existing or commencing construction or reconstruction after the effective date of this subpart. This information is being collected to assure compliance with 40 CFR part 63, subpart KK.

Owners or operators of the affected facilities described must make one-time-only notifications. Owners or operators 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. Monitoring requirements specific to the NESHAP for the Printing and Publishing Industry in subpart KK, provide information on the operation of the emissions control device and compliance with the (opacity) standard. Semiannual reports of excess emissions are required. These notifications, reports, and records are essential in determining compliance, and are required, in general, of all sources subject to NESHAP. Any owner or operator subject to the provisions of this part will maintain a file of these measurements, and retain the file for at least five years following the date of measurements, maintenance reports, and records.

Approximately 350 major sources comprised of 150 major sources and 200 area sources are currently subject to the standard, and it is estimated that two sources per year will become subject to the standard over the next three years. The cost of this Information Collection Request (ICR) will be \$3,553,424 (rounded).

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 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or 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, Hazardous Air Pollutants (HAP) emissions from printing and publishing industry cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 63, subpart KK.

2(b) Practical Utility/Users of the Data

The control of emissions of HAP from printing and publishing industry is the result of operation of the publication rotogravure, product and packing rotogravure, and wide-web flexographic printing presses. For the businesses that do not use materials substitution as a means of complying, the control of emissions of HAP from printing and publishing industry requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. These standards rely on the capture and reduction of HAP emissions by control devices like oxidizers and solvent recovery systems or by material substitution. Facilities may use continuous emissions monitoring or other measurement tests.

The required notifications are used to inform the Agency or delegated authority when a source becomes subject to the standard. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected, repaired and the standard is being met. Performance test reports are needed as these are the Agency's records of a source's initial capability to comply with the emission standard, and serve as a record of the operating conditions under which compliance was achieved. Operating conditions may include combustion zone temperature, catalytic bed inlet temperature, and volumetric gas flow. 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 the

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 Clean Air Act. 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. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under (40 CFR part 63, Subpart KK).

3(a) Nonduplication

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 their 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, no duplication exists.

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 (71 FR 35652) on June 21, 2006. No comments were received on the burden published in the Federal Register.

3(c) Consultations

For this information collection, we used several different resources to obtain the most recent data available for the printing and publishing industry sources. We referenced the most recent ICR, and reviewed information available from the Office of Compliance Sector Notebook AProfile of the Printing Industry, © and the Sector Notebook Data Refresh - 1997. We also accessed the most recent data available on the Air Facility System (AFS) database as maintained by the Office of Compliance. In addition, we contacted a number of Trade Associations, they are as follow: 1) Graphic Arts Technical Foundation, Mr. Gary Jones (412) 741-6860; 2) Printing Industries of America, Mr. Ron Davis, (703) 519-8102, or (434) 591-0527, and 3) Flexographic Packaging Association, Mr. Ram Singh-Hal, (410) 694-0823.

3(d) Effects of Less Frequent Collection

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

equipment and noncompliance would decrease.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR 1320.5.

3(f) Confidentiality

The required information has been determined not to be confidential. However, 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 (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 contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents of the recordkeeping and reporting requirements are owners and operators of publication rotogravure, product and packaging rotogravure, and wide-web flexographic printing presses subject to NESHAP subpart KK facilities. The United States Standard Industrial Classification (SIC) codes which corresponds to the North America Industry Classification System (NAICS) codes could be found in the following table.

Standard	SIC Codes	NAICS Codes
List each Standard (e.g., 40 CFR part 63, subpart KK)	2392	314911
	2652	322213
	2653	322211
	2656	322215
	2657	322212
	2671	322221
	2673	322223, 326111
	2674	322224
	2676	322291
	2679	322299, 322211, 322231, 322222

Standard	SIC Codes	NAICS Codes
	2721	511120
	2741	511199
	2754	323111
	2759	323112, 323119
	2771	323112, 323111, 323119
	3089	326199
	3497	322225
	3996	326192

4(b) Information Requested

These standards require affected facilities to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent the part 70 permit program and the five-year statute of limitations on which the permit program is based. Also, the retention of records for five years would allow EPA to establish the compliance history of a source 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 five years. EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than five years.

(i) Data Items

All data in this ICR that is recorded and/or reported is required by National Emission Standards for Hazardous Air pollutants for the Printing and Publishing Industry (40 CFR part 63, subpart KK).

A source must make the following reports:

Reports for 40 CFR part 63, subpart KK	
Initial notification	63.830(b), 63.5(d), 63.9(b), 63.10(f)
Notification of change	63.821(a)(6), 63.820(a)(2)
Notification of compliance status	63.9(h), 63.830(b)
Initial performance test and evaluation	63.830(b), 63.7(b), 63.9(e), (g), (j)
Rescheduled initial performance test	63.7(b)(2)

Reports for 40 CFR part 63, subpart KK	
Initial performance test results	63.830(b), 63.6(g), 63.10(d), (e)
Opacity or visible emissions	63.10(d)(3)
Periodic startup, shutdown, malfunction reports	63.830(b), 63.6(e), 63.10(a), (d)
Summary report	63.830(b), 63.10(e)
Excess emission and continuous monitoring system (CMS) performance reports	63.830(b), 63.10(a), (e)

A source must keep the following records:

Recordkeeping for 40 CFR part 63, subpart KK	
Startups, shutdowns, and malfunctions periods where the continuous monitoring system is inoperative.	63.829(b), 63.10(b)(2)
Emission test results and other data needed to determine emissions, operating parameters, etc.	63.824(b) 63.825(b), (c), (d), (e), (f), (g), 63.828(a), 63.829(b), (c), (d), (e), (f)
All reports and notifications	63.10(b)
Record of applicability	63.10(b)(3)
Records for sources with continuous monitoring systems	63.829, 63.10(c)
Records of HAP usage for area sources	63.829(d)
Record of maintenance	63.829(b), 63.10(b)(2)

Electronic Reporting

Some State Regulatory Agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronic reporting systems are still not widely used by the regulatory Agencies. The estimated amount of electronic reporting is 20%.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS 63.824(b), 63.825(c)(d), 63.828(a), 63.8(c).

Respondent Activities
Perform initial performance test, Reference Method 311 test, and repeat performance tests if necessary. Conduct CMS performance evaluation.
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.
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.
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.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
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 Air Facility System (AFS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might 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 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 AFS which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for more than 100,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner or operator for five years.

5(c) Small Entity Flexibility

The standard applies to owners and operators of publication rotogravure, product and packaging rotogravure, and wide-web flexographic presses located at both major and area sources. However, 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 requirements the minimum 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 in Table 1: Annual Industry Burden for NESHAP for the Printing and Publishing Industry (40 CFR part 63, subpart KK).

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 the burden under the Paperwork Reduction Act. Where ever appropriate specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The 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 average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 50,796 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the

development of the regulation, 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: Technical Labor Rate of \$61.66 per hour, and 5% of \$89.94 per hour for Managerial labor; also, 10% of \$38.39 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2002, ATable 10. Private industry, by occupational and industry group.® The rates are from column 1, ATotal compensation.® The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

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

The types of industry cost 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 cost 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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents ¹	(D) Total Capital/Startu p 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	\$7,000	1	\$7,000	\$9,000	45	\$405,000

The total capital/startup cost for this ICR is \$7,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$405,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance cost to industry over the next three years of the ICR is estimated to be \$412,000.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported

¹ One new major source per year

information. EPA's overall compliance and enforcement program includes activities such 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 \$15,046. This cost is based on the average hourly labor rate at a GS-12, Step 1, times 1.6 benefits multiplication factors to account for government overhead expenses for a total of \$39.49. These rates are from the Office of Personnel Management (OPM) A2003 General Schedule@ which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: NESHAP for the Printing and Publishing Industry (40 CFR part 63, subpart KK).

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

Approximately 350 sources comprised of 150 major sources and 200 area sources that are currently subject to the regulation. It is estimated that two additional sources per year will become subject to the regulation over the next three years.

Respondent Universe and Number of Responses Per Year						
Regulation Citation	(A) Average Number of New Respondents per Year	(B) Number of Reports for New Sources	(C) Number of Existing Respondents	(D) Number of Reports for Existing Sources	(F) Number of Respondents that keep records but do not submit reports	(E) Total Annual Responses = (AxB)+(CxD)+F
40 CFR part 63, subpart KK	2	4	150	2	200	508

The number of total respondents is 352. This represents the number of existing sources plus the number of new sources averaged over the three-year period (i.e., the total of the number of new respondents over the three-year period divided by three years).

The number of Total Annual Responses is 508. This is the number in column E of the Respondent Universe and Number of Responses Per Year table above.

The total annual labor costs are \$3,553,424. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost, NESHAP for the Printing and Publishing Industry, (40 CFR part 63, subpart KK).

Note that the total annual capital and O&M costs to the regulated entity are \$412,000. These costs are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

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

The bottom line burden hours and cost tables for both the Agency and the respondents are attached. The annual public reporting and recordkeeping burden for this collection of information are estimated to average 100 hours per response.

6(f) Reasons for Change in Burden

There is no change in the labor hours or cost in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden.

Since there are no changes in the regulatory requirements and there is no significant industry growth, the labor hours and cost figures in the previous ICR are used in this ICR and there is no change in burden to industry.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information are estimated to average 100 hours per response. Burdens 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.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing a respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number OECA-2006-0438. 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), EPA West, Room B102, 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-2006-0438 and OMB Control Number 2060-0335 in any

correspondence.

Part B of the Supporting Statement

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