Supporting Statement For NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR part 60, subpart FFF)

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)

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for subpart FFF were proposed on January 18, 1983, and promulgated on June 29, 1984. These standards apply to the following facilities in subpart FFF: each rotogravure printing line used to print or coat flexible vinyl or urethane products, and 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.

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 this rule provide information on the operation of emissions control devices. Semiannual reports of excess emissions or exceedances of standards are required. These notifications, reports, and records are essential in determining compliance, and are required, in general, of all sources subject to NSPS.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated State or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) Regional Office.

Approximately 20 sources are currently subject to the regulation, and it is estimated that one additional source will become subject to the standard in the next three years, for an average of 0.33 new sources per year. These figures are based on queries conducted in the EPA's Air Facility System (AFS) through the Online Tracking Information System (OTIS). The cost of this Information Collection Request (ICR) will be $36,535.

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 required that the Administrator review and, if appropriate, revise such standards every four years.

2(b) Practical Utility/Users of the Data

The control of emissions of volatile organic compounds (VOC) from printing and coating flexible vinyl and urethane products requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of volatile organic compounds are the result of operation of the printing on flexible vinyl and urethane coating. These standards rely on the reduction of volatile organic compounds emissions by using inks with low VOC content or on the capture of those compounds by solvent recovery systems, thermal incinerators or catalytic incinerators.

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 (if this method is chosen to comply with the regulation) are properly installed and operated and the standard is being met. Performance test reports are needed as these are the Agency's record 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. For facilities using control equipment to meet this standard, the operating conditions may include temperature or volatile organic compound concentration.

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 NSPS continue to operate the control equipment and achieve 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 60, subpart FFF.

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

3(c) Consultations

For this information collection, the previous ICR renewal was used to obtain burden estimate, all data and assumptions from the previous ICR renewal were used as the basis for estimating the hourly and cost burdens associated with this renewal.

Based on this information there will be an estimated 20 respondents with one industry growth expected over the next three years. In the previous ICR renewal several different resources were used to obtain the most recent data available for the flexible vinyl and urethane coating and printing sources. We referenced the most recent ICR, and accessed the data (April 14, 2003) available on the Air Facility System (AFS) database maintained by the Office of Compliance. We also retrieved data from the Toxic Release Inventory System (TRIS) maintained by the Office of Environmental Information.

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 techniques 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, c1, 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 subpart FFF that commenced construction, modification, or reconstruction after January 18, 1983. They are listed under SIC Codes 2295 and 2679. Both of these Codes contain firms that are not covered by this rule. This rule does not cover resilient floor covers or flexible packaging. The government is in the process of transitioning to the new North American Industrial Classification System (NAICS). The NAICS codes for this industry are 31332, 322222, and 322299 for source category description.

4(b) Information Requested, including record keeping requirements

(i) Data Items

All data in this ICR that are recorded and/or reported are required by New Source Performance Standards for Flexible Vinyl and Urethane Coating and Printing (40 CFR part 60, subpart FFF).

A source must make the following reports:

Reports for 40 CFR part 60, subpart FFF	
Construction/reconstruction	60.7(a)(1)
Physical or operational change	60.7(a)(4)
Initial performance test	60.8(d)
Delay of/and rescheduled initial performance test(s)	60.8(d)

Reports for 40 CFR part 60, subpart FFF	
Actual startup	60.7(a)(3)
Initial performance test results	60.8(a), 60.585(a)
Demonstration of continuous monitoring system	60.7(a)(5)
Semiannual reports	60.7(c) and 60.7(d) 60.585(b)

A source must maintain the following records:

Recordkeeping for 40 CFR part 60, subpart FFF	
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(d)
Maintain file of all measurements	60.7(e) 60.583(b) and 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)

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for VOC concentration or temperature.
Perform initial performance test, Reference Methods 24, 25, 1, 2, 3, and 4 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

Respondent Activities
maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust 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.

Presently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., volatile organic compounds. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. In addition, some 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.

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) database.

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 (VOC concentration or temperature) 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 over 100,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and State regulatory agencies, and EPA Regional Offices and 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 two years.

5(c) Small Entity Flexibility

A majority of the affected facilities are large entities (e.g., large businesses). 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.

The number of small entities potentially subject to the requirements of this ICR is estimated to be five percent of the respondent universe. This estimate is based on the discussion of impacts at the affected small entities during the development of the rule (see BID EPA-450/3-81-016a).

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Industry Burden for NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR part 60, subpart FFF).

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 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 593 (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 NSPS program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses a technical labor rate of $61.66 per hour. This rate is from the United States Department of Labor, Bureau of Labor Statistics, September 2002, "Table 10. Private industry, by occupational and industry group." The rates are from column 1, "Total compensation." The rate has 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 type of industry costs associated with the information collection activity in the regulations are for labor and continuous emission monitoring (CEM). 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 monitor and other costs such as photocopying and postage.

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

The type of industry costs associated with the information collected activity in the regulations are for labor and continuous emission monitoring (CEM). 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 monitor and other costs such as photocopying and postage.

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Startup Cost for One	(C) Number of New Affected	(D) Total Startup (B X C)	(E) Annual O&M Costs for One Affected Facility	(F) Number of Affected Facilities with	(G) Total O&M (E X F)

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
	Affected Facility	Facilities to Startup			O&M	
Temperature or feed rate monitor	$20,000	0.33	$6,600	$9,000	6	$54,000

The total capital/startup cost for this ICR is $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 $54,000. This is the total of column G.

The total respondent non-labor costs have been calculated as the addition of the capital/startup costs, and the annual operation and maintenance costs. The average annual cost for capital/startup and operation and maintenance costs to industry of the next three years of the ICR are estimated to be $60,600.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. Publication and distribution of the information are part of the AFS program. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of EPA's overall compliance and enforcement program

The average annual Agency cost during the three years of the ICR is estimated to be $3,896. [see Table 2 in Section 6(e)]. This cost is based on the average hourly labor rate at a GS-12, Step 1, times a 1.6 benefits multiplication factor to account for government overhead expenses for a total of $39.49. This rate is 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, Annual Agency Burden for NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR part 60, subpart FFF) attached.

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

Respondent Universe and Number of Responses Per Year						
Regulation Citation	(A) Average Number of New Respondents per Year	(B) Number of Reports for New Source	(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 60, subpart FFF	0.33	2	20	2	0	40.66

The number of total respondents is 20.33, rounded to 20. This number is the sum of column A and column C of the Respondent Universe and Number of Responses Per Year table.

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 41. This is the number in column E of the Respondent Universe and Number of Responses Per Year table.

The total annual labor costs are $36,535. Details upon which this estimate is based appear in Table 1: Annual Respondent Burden and Cost - NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR part 60, subpart FFF).

The total annual capital and O&M costs to the regulated entity are $61,000. These costs are detailed in section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

6(e) Bottom Line Burden Hours 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 is estimated to average 14 (rounded) hours per response.

6(f) Reasons for Change in Burden

There is no change in burden from the most recently approved ICR, this is due to the fact that we estimate no increase in the number of new or modified sources.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 14 (rounded) hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA's 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-2006-0411. 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 Enforcement and Compliance Docket and Information Center Docket is (202) 566-1514. 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 Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2006-0411 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 the information.

TABLE 1: Annual Industry Burden - NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF)

Reporting/Recordkeeping	Hours per Occurrence (A)	Occurrences/ Respondent/ Year (B)	Hours/ Respondent/ Year (C=A x B)	Respondents per Year (D)	Hours per Year (E = C x D)	Cost/ Year [a] (F=E x $61.66)
1. APPLICATIONS		Not Applicable				
2. SURVEY AND STUDIES		Not Applicable				
3. REPORTING REQUIREMENTS						
New Sources [b]						
A. Read Instructions [c]	1	1	1	0.33	0.33	$20.35
B. Required Activities						
New Sources						
Initial performance test [d]	280	1	280	0.33	92.4	$5,697.38
Repeat performance test [e]	280	1	280	0.07	18.48	$1,139.48
C. Create Information		Included in 3B				
D. Gather Existing Information		Included in 3B				
E. Write Report						
New Sources						
Notification of construction/ reconstruction [f]	2	1	2	0.33	0.66	$40.70
Notification of initial performance test [g]	2	1	2	0.33	0.66	$40.70
Report of initial performance test		Included in 3B				
Existing Plants						
Submit semi-annual report [h]	4	2	8	20	160	$9,865.60
	272.53	$16,804.21				
4. RECORDKEEPING REQUIREMENTS						
A. Read Instructions		Included in 3A				
B. Plan Activities		Included in 3B				
C. Implement Activities		Included in 3B				
D. Develop Record System	N/A	N/A	N/A	N/A	N/A	N/A
E. Time to Enter Information						
Records of startup, shutdown and malfunctions [i]	1.5	2	3	20	60	$3,699.60
Records of VOC, temperature and CMS maintenance [j]	0.25	52	13	20	260	$16,031.60
F. Audits N/A	N/A	N/A	N/A	N/A	N/A	
SUBTOTAL					320	$19,731.20
TOTAL ANNUAL INDUSTRY COST BURDEN (rounded)					593	$36,535

Assumptions:
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Technical labor rate (Bureau of Labor Statistics) is $29.36 + 110% = $61.66
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Number of new facilities (per year): 0.33
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Time required to read instructions (hours): 1
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Time required to compete performance test (hours): 280
ffffffffffffffffffffffffffffffffffffffff Rate of failed performance tests: 20% ffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffffff
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Time required for notification preparation (hours): 2

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Time required for notification of initial performance test (hours): 2
iii
Time required to compile data for semiannual report (hours): 4

i. Time required to record startup, shutdown, and malfunction (hours): 1.5
j. Time required to record VOC, temperature and CMS maintenance (hours): 0.25

TABLE 2: AVERAGE Annual EPA Burden - NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF)

Burden Items	EPA hrs/ Occurrence (A)	Occurrences Plant/Year (B)	EPA hrs/ Plant/Year (C=AxB)	Plants/ Year (D)	EPA Hrs/Year (E=CxD)
Required Activities					
New Plant					
Initial performance tests	24	1	24	0.33	7.92
Repeat performance tests [b]	240.2	4.80	.33	1.58	4
Report Review					
New Plant					
Notification of construction [c]	21	2	0.33	0.66	
Notification of initial startup [d]	0.5				
0.5	0.33	0.165			
Notification of actual startup [e]	0.5				
0.5	0.33	0.165			
Notification of initial test	0.5				
0.6 0.33		0.198			
Review test results [g]	0.5				
9.6 0.33		3.168			
Existing Plants					
Semiannual reports of emission exceedances [h]	2	2	4	20	80
TOTAL ANNUAL HOURS					93.86

Travel expenses [i]
(1 person x .33 plant/year x 3 days/plant x $75 per diem) + ($350 round trip/plant x .33 plant/year) = $189.75

Salary [j]
(1 person x 93.86 hr/year x $39.49/hrs) = $3,706.53

TOTAL ANNUAL EPA COST BURDEN = $3,896 (rounded)

Assumptions:

a. Time required to participate with performance test (hours per plant): 24
b. Rate of failed performance tests: 20%
c. Time required to review construction notification (hours): 2
d. Time required to review startup and initial test notifications (hours): 0.5
e. Notification of actual startup (hours): 0.5
f. Time required to review initial test notification (hours): 0.5
g. Time required to review test results (hours): 8
h. Time required to review semi-annual reports (hours): 2
i. Round trip airfare to visit plant: $350
j. EPA=s labor rate at a GS-12, Step 1, times 1.6 government overhead expenses: $39.49