

**Supporting Statement for NSPS for the Graphic Arts Industry  
(40 CFR Part 60, Subpart QQ)**

**1. Identification of the Information Collection**

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

NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ)

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

The New Source Performance Standards (NSPS) for Subpart QQ were proposed on October 28, 1980, and promulgated on November 8, 1982. These standards apply to the following affected facilities in NSPS subpart QQ: each publication rotogravure printing press (not including proof presses) commencing construction, modification or reconstruction after the date of a proposal. This information is being collected to assure compliance with 40 CFR part 60, subpart QQ.

Owners or operators of the affected facilities described have certain notification, reporting, and recordkeeping requirements under this rule. These are, a one-time-only notification of the actual dates of startup, recordkeeping of monthly emissions calculations, and a report of the initial performance test. 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 two years following the date of such reports and records. In addition, semiannual reports are required for respondents (i.e., sources) that experience excess emissions.

Approximately 19 facilities are currently subject to the standard, and it is estimated that one additional facility will become subject to the standard over the next three years. It is assumed seven of those facilities will add or modified a press at their facility during the three-year period. The one new facility will begin operations. The average annual labor cost to industry over the next three years of this Information Collection Request (ICR) is estimated to be \$108,663.

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.

The Office of Management and Budget (OMB) approved the current Information Collection Request (ICR) without any A Terms of Clearance. @

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

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

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

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

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

In the Administrator's judgment, volatile organic compound (VOC) emissions from publication rotogravure printing presses cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart QQ.

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

The control of emissions of volatile organic compounds from publication rotogravure printing presses requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of VOC from publication rotogravure printing presses are the result of operation of the affected facilities. The subject standards are achieved by the capture of VOC emissions using control technology and leak detection and repair procedures. The notifications required in the applicable regulations 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 and leaks are being detected and repaired and the regulations are 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 standards, and serve as a record of the operating conditions under which compliance was achieved. 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 in compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with the applicable regulations, 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 QQ.

### **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 a 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 October 5, 2006 (71 FR 58853). No comments were received on the burden published in the Federal Register.

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

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the AFS (Air Facility System) which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 19 respondents will be subject to the standard over the three year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

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

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

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet 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 part 1320, section 1320.5.

**3(f) Confidentiality**

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B - Confidentiality of Business Information (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 to the recordkeeping and reporting requirements are the graphic arts industry. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is 2754 which corresponds to the North American Industry Classification System (NAICS) code 323111 for Graphic Arts Industry.

**4(b) Information Requested**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR Part 1320, Section 1320.5.

**(i) Data Items**

All data in this ICR that is recorded and/or reported is required by New Source Performance Standards, (NSPS) for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ).

A source must make the following reports:

Notification Reports	Standard Citation by Section
----------------------	------------------------------

Notification and application of construction or modification.	60.7(a)(1)
Notification of actual startup.	60.7(a)(3)
Notification of initial performance test.	60.8(d)
Notification of physical or operational change which may increase the emission rate.	60.7(a)(4)

Reports	
Initial performance test	60.8(a) and 60.433(e)(6)
Semiannual reports	60.7(c)

A source must keep the following records:

Recordkeeping	
Startups, shutdowns, malfunctions.	60.7(b)
Records necessary to determine conditions of the performance test.	60.8(c), 60.7(f), and 60.433(a)(5)
Records showing information to make monthly calculations of emissions.	60.7(f), and 60.434(a)
Maintain records for two years.	60.7(f)

### Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., solvent recovery systems or a solvent vapor capture system to control emissions. 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. It is estimated that approximately 10 percent of the respondents use electronic reporting.

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

<b>Respondent Activities</b>
Read instructions.
Perform initial performance test, Reference Method 24A test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for 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.

Currently, sources are using automated monitoring equipment that provides parameter data. 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.

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

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

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

<b>Agency Activities</b>
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.

<b>Agency Activities</b>
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. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs.

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 data for approximately 125,000 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 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.

### **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 the Graphic Arts Industry (40 CFR Part 60, Subpart QQ).

## 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 1,718 (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 the following labor rates:

Managerial	\$93.09	(\$44.33 + 110%)
Technical	\$64.13	(\$30.54 + 110%)
Clerical	\$39.65	(\$18.88 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2003, "Table 10. Private industry, 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 only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only types of industry cost associated with the information collection activity in the



regulations are labor costs. There are no capital/startup or operation and maintenance costs, because the equipment used by the respondent is the same equipment used in their day-to-day operations to maintain quality control over the surface coating produced for sale.

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

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes 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 \$18,989. This cost is based on the average hourly labor rate as follows:

Managerial	\$54.02	(GS-13, Step 5, \$33.76 x 1.6)
Technical	\$40.08	(GS-12, Step 1, \$25.05 x 1.6)
Clerical	\$21.70	(GS-6, Step 3, \$13.56 x 1.6)

These rates are from the Office of Personnel Management (OPM) A2004 General Schedule@ which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden - NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ).

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

Based on our research for this ICR, approximately 19 existing sources are currently subject to the standard. It is estimated that one additional source per year will become subject to the standard over the next three years and that 30 percent of the existing sources will be reconstructed or modified.

Number of respondents is calculated using the following table which addresses the three years covered by this ICR.

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents	(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	2.23 <sup>1</sup>	19	0	1.9	19.33
2	2.23 <sup>1</sup>	19	0	1.9	19.33
3	2.23 <sup>1</sup>	19	0	1.9	19.33
Average	2.23 <sup>1</sup>	19	0	1.9	19 (rounded)

<sup>1</sup> One new facility will become subject to the standard and 5.7 facilities per year will be modified or reconstructed over the next three years. The average per year is 2.23.

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 19.33.

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

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	2.23	1	N/A	2.23
Notification of actual startup	2.23	1	N/A	2.23
Notification of initial performance test	2.23	1	N/A	2.23
Initial performance test report	2.23	1	N/A	2.23
Semiannual reports	19	2	N/A	38
			Total	47 (rounded)

The number of Total Annual Responses is 47. The total annual labor costs are \$108,663. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost, NSPS for Graphic Arts Industry (40 CFR Part 60, Subpart QQ).

Note that the total annual capital and O&M costs to the regulated entity are \$0. 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 37 (rounded) hours per response.

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

There is no change in burden from the most recently approved ICR.

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

The annual public reporting and recordkeeping burden for this collection of information are estimated to average 37 (rounded) 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.

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-2006-0707. 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 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 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-2006-0707 and OMB Control Number 2060-0105 in any correspondence.

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

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



Burden item	(A) Technical Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical Person- hours per respondent per year (C=AxB)	(D) Respondents per year	(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) Total Cost Per Year <sup>a</sup>
A. Read instructions	Included in 3A							
B. Plan activities	Included in 4C							
C. Implement activities	Included in 3B							
D. Develop record system	3	1	3	0.33 <sup>e</sup>	0.99	0.05	0.10	\$73.11
E. Time to enter information								
a. Records of startup, shutdown, malfunction, etc.	0.2	4.29 <sup>g</sup>	0.858	19.33 <sup>f</sup>	16.59	0.83	1.66	\$1,207.00
b. Records of VOC for monthly materials and emissions calculation	1	51.48 <sup>h</sup>	51.48	19.33 <sup>f</sup>	995.11	49.8	99.6	\$72,401.42
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal Labor Burden					1,493.55	74.71	149.46	\$108,663.18
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						1,718		\$108,663

Assumptions:

<sup>a</sup> This ICR uses the following labor rates: \$93.09 per hour for Executive, Administrative, and Managerial labor; \$64.13 per hour for Technical labor, and \$39.65 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2003, "Table 10. Private industry, by occupational and industry group."

<sup>b</sup> We have assumed that 30 percent of respondents will modify their operations over the three-year period of this ICR (19x30%=5.7). The one new facility will come on lines over the three-year period. Average over three years is 2.23 [(5.7+1)/3=2.23] per year.

<sup>c</sup> Assume that 20 percent would have to repeat the performance test due to failure.

<sup>d</sup> We have assumed that 90 percent of the existing respondents will submit semiannual reports.

<sup>e</sup> It is assumed that one new facility will become subject to the standard over the next three years. For each year within the three years of the active life of this ICR there will be .33 new respondent.

<sup>f</sup> We have assumed that there are 19 existing respondents, plus .33 new respondent for a total of 19.33 respondents per year.

<sup>g</sup> We have assumed that there are 19 existing respondents with an average of four presses per facility ( $19 \times 4 = 76$ ), plus six modified presses, and one at a new respondent for a total of 83 presses that are subject to the rule. Therefore, the number of occurrences per respondent per year is 4.29 ( $83 / 19.33 = 4.29$ ).

<sup>h</sup> We have assumed that the number of occurrences per respondent per year to record VOC is 51.48 ( $4.29 \times 12$  months).



**Table 2: Average Annual EPA Burden - NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ)**

Burden Item	(A) Technical Person Hours Per Occurrence	(B) Number of Occurrences Per Plant Per Year	(C) Technical Person Hours Per Plant Per Year (C=AxB)	(D) Plants Per Year	(E) Technical Hours Per Year (E=CxD)	(F) Management Hours Per Year (F=0.05xE)	(G) Clerical Hours Per Year (G=0.1xE)	(H) Total <sup>a</sup> Costs, Per Year
Initial Performance Test	24	1	24	7 <sup>b</sup>	168	8.4	16.8	\$7,581.77
Repeat initial performance test	24	1	24	1.4 <sup>c</sup>	33.6	1.68	3.36	\$1,510.36
Report Review for new plants:								
Notification of construction reconstruction and startup	2	1	2	7 <sup>b</sup>	14	0.7	1.4	\$629.31
Notification of actual startup	0.5	1	0.5	7 <sup>b</sup>	3.5	0.175	0.35	\$157.33
Notification of initial performance test	0.5	1	0.5	7 <sup>b</sup>	3.5	0.175	0.35	\$157.33
Review test results	4	1	4	7 <sup>b</sup>	28	1.4	2.8	\$2,036.99
Semiannual reports	2	2	4	19 <sup>d</sup>	76	3.8	7.6	\$3,416.28
Subtotal					326.6	16.33	32.66	\$15,489.37
Travel Expenses <sup>e</sup>	(1 person x 7 plant/yr x 2 day/plant x \$50 per diem) + (\$400/round trip x 7 round trips/yr) = \$3,500							
<b>TOTAL LABOR BURDEN and COST (rounded)</b>						366		\$18,989

**Assumptions:**

<sup>a</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$54.02 for Managerial (GS-13, Step 5, \$33.76 x 1.6), \$40.08 for Technical (GS-12, Step 1, \$25.05 x 1.6) and \$21.70 Clerical (GS-6, Step 3, \$13.56 x 1.6). These rates are from the Office of Personnel Management (OPM) A2003 General Schedule@ which excludes locality rates of pay.

<sup>b</sup> We have assumed that 30% of affected facilities will modify their presses per year over the three year periods of this ICR (19/30%=5.7) six rounded. The one new facility will add three presses over the three-year period (one press per year) for a total of seven presses (six modified + one new press).

<sup>c</sup> Assume that 20 percent would have to repeat the performance test due to failure.

<sup>d</sup> We have assumed that all 19 respondents will submit semiannual reports.

<sup>e</sup> Assume that it will take one person two days to visit each of the seven plants.