

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Printing, Coating and Dyeing of Fabrics and other Textiles (40 CFR Part 63, Subpart OOOO) (Renewal), EPA ICR Number 2071.04, OMB Control Number 2060-0522

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Printing, Coating and Dyeing of Fabrics and Other Textiles were proposed on July 11, 2002 (67 FR 46028), promulgated on May 29, 2003 (68 FR 32172), and amended on August 4, 2004 (69 FR 47001). These standards apply to each existing, new or reconstructed printing, coating, slashing, dyeing or finishing of fabric and other textiles. This information is being collected to assure compliance with 40 CFR part 63, subpart OOOO.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP. A semiannual report of compliance is also required.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five 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 U.S. Environmental Protection Agency (EPA) regional office.

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

An average of 140 respondents will be subject to the regulation over the period covered by this ICR. It is estimated that one additional respondent per year will become subject to the regulation in the next three years.

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

The “Affected Public” are private sector businesses that coat fabrics and textiles. The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors and is found below in Table 2: Average Annual EPA Burden - NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (Renewal).

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/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, coating and dyeing of fabrics and other textiles facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart OOOO.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test, a record of the

operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard 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, that leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

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

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart OOOO.

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, 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 (73 FR 31088) on May 30, 2008. No comments were received on the burden published in the Federal Register.

3(c) Consultations

For the information collection, we referenced the most recent ICR, consulted with the preparer of the active ICR, and used other resources to obtain the most recent data available. We reviewed information available from the U.S. Census Bureau, the AIRS Facility System (AFS), and websites covering flexible polyurethane foam fabrication. We also consulted with the EPA's Office of Air Quality Planning and Standards, Information Transfer and Program Integration Division, and with the National Council of Textile Organizations (NCTO), Mr. Mike Hubbard at (704) 824-3522.

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 that 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.

These standards require the respondents 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 with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. 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.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are printing, coating and dyeing of fabrics and other textiles. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, which corresponds to the North American Industry Classification System (NAICS) codes, are listed below for source category descriptions.

Standard (40 CFR part 63, subpart OOOO)	SIC Codes	NAICS Codes
Broadwoven Fabric Mills, Cotton	2211	313210
Broadwoven Fabric Mills, Manmade Fiber and Silk	2221	313210
Broadwoven Fabric Mills, Wool (including dyeing and finishing)	2231	313210
Textile Goods, NEC (broadwoven fabrics of jute, linen, hemp, and ramie and hand woven fabrics)	2299	313210
Narrow Fabric and Other Smallware Mills; Cotton, Wool, silk and Manmade Fiber	2241	313221
Textile Goods, NEC (narrow woven fabric of jute, linen, hemp, and ramie)	2299	313221
Knitting Mills, NEC (knitting weft fabric and fabricating textile products, such as bedspreads, curtains, or towels)	2259	313241
Broadwoven Fabric Mills, Wool (wool broadwoven fabric finishing without weaving fabric)	2231	313311
Finishers of Broadwoven Fabrics of Cotton	2261	313311
Finishers of Broadwoven Fabrics of Manmade Fiber and Silk	2262	313311
Broadwoven Fabric Mills, Wool (wool fabric, except broadwoven, finishing without weaving fabric)	2231	313312
Knit Outerwear Mills (dyeing and finishing knit outerwear without knitting outerwear)	2253	313312
Knit Underwear and Nightwear Mills (dyeing and finishing underwear and nightwear without knitting garments)	2254	313312
Weft Knit Fabric Mills (finishing weft fabric without knitting weft fabric)	2257	313312
Lace and Warp Fabric Mills (Finishing lace or warp fabric without knitting lace or warp fabric)	2258	313312
Finishers of Textiles, NEC (except linen fabric finishing)	2269	313312
Thread Mills (finishing thread without manufacturing thread)	2284	313312
Textile Goods, NEC (finishing hard fiber thread and yarn without manufacturing thread or yarn)	2299	313312
Coated Fabrics, Not Rubberized	2295	313320
Fabricated Rubber Products, NEC (rubberizing fabric or purchased textile products)	3069	313320
Carpets and Rugs	2273	314110
Rubber and Plastics Hose and Belting	3052	326220
Gaskets, Packing, and Sealing Devices	3053	339991

Standard (40 CFR part 63, subpart OOOO)	SIC Codes	NAICS Codes
Fabricated Rubber Products, NEC (rubberizing fabric or purchased textile products)	3069	313320

4(b) Information Requested

These reporting or recordkeeping requirements do not violate any of the regulations that OMB established under 5 CFR part 1320, section 1320.5.

(i) Data Items

All data in this ICR that are recorded and/or reported are required by NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR part 63, subpart OOOO).

A source must make the following reports:

Notifications	Standard Citation by Sections
Initial notification	63.9(b), 63.4310(b)
Notification of intent to construction/reconstruction	63.9(b)(4), 63.4310
Notification of anticipated startup	63.9(b)(4), 63.4310
Notification of actual startup	63.9(b)(4), 63.4310
Request for extension of compliance date	63.9(c), 63.4283
Notification of performance test	63.9(e), 63.6310
Notification of compliance status	63.9(h)(2), 63.4310
Continuous monitoring system	63.9(h)
Performance test report	63.10(d)(2), 63.4311
Startup, shutdown, malfunction (SSM) report	63.6(e)(3), 63.4311
Excess emissions or no excess emissions report	63.10(e)(3), 63.4311

A source must make the following reports:

Recordkeeping	
Record of startup, shutdown, and malfunctions	63.6(e)(3), 63.4311
Records are required to be retained for five years	63.10(b)(2)

Electronic Reporting

At the present, respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must evaluate the data, this internal automation has significantly reduced the burden associated with monitoring and recordkeeping at

the plant site.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 33 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Perform initial performance 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.
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 sources 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

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. 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 the EPA Office of Compliance. AFS is the EPA 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/operator for five years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. 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 below in Table 1: Annual Industry Burden for NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR part 63, subpart OOOO) (Renewal).

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 20,821 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of this

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:

Managerial	\$97.46	(\$46.41 + 110%)
Technical	\$83.71	(\$39.86 + 110%)
Clerical	\$42.55	(\$20.26 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "Table 2: Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

The type of industry costs associated with the information collection activities in the subject standard are labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance (O&M) 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

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	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Parametric monitoring (contractor)	\$2,953	1	\$2,953	\$26	140	\$3,640

The total capital/startup costs for this ICR are \$2,953. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$3,640. This is the total of column G.

The total respondent costs in block 14 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 over the next three years of the ICR is estimated to be \$6,593.

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 emission, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$44,574. This cost is based on the average hourly labor rate as follows:

Managerial	\$56.02	(GS-13, Step 5, \$35.01 x 1.6)
Technical	\$41.57	(GS-12, Step 1, \$25.98 x 1.6)
Clerical	\$22.50	(GS-6, Step 3, \$14.06 x 1.6)

These rates are from the Office of Personnel Management (OPM) "2005 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden, NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (Renewal), attached below.

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

Based on our research for this ICR, on average over the next three years, approximately 140 existing respondents will be subject to the standard. It is estimated that one additional respondent per year will become subject. The overall average number of respondents, as shown in the table below is 140 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	1	138	0	0	139
2	1	139	0	0	140
3	1	140	0	0	141
Average	1	139	0	0	140

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 140.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Initial notification	1	1	0	1
Application of construction/reconstruction	1	1	0	1
Notification of anticipated startup	1	1	0	1
Notification of actual startup	1	1	0	1
Notification of compliance status	1	1	0	1
Notification of performance test	1	1	0	1
Performance test report	1	1	0	1
Report of monitoring exceedances	6.6	2	0	13.2
Report of no excess emissions	59.4	2	0	118.8
Startup, shutdown, malfunction report	6.6	2	0	13.2
Report of compliance deviation	7.4	2	0	14.8
Report of no compliance deviations	66.6	2	0	133.2
			Total	300

The number of Total Annual Responses is 300.

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

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor costs are \$1,680,831. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 69 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$6,593. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 1,099 labor hours at a cost of \$44,574. See Table 2: Annual Agency Burden and Cost, NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart

OOOO) (Renewal), attached below.

6(f) Reasons for Change in Burden

There is no change in the burden hours or cost to the respondents 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. Second, the growth rate for the respondents is very low, negative or nonexistent. Therefore, the labor hours and cost figures in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR.

It should be noted that the “Notice of Office of Management and Budget Action,” dated June 12, 2006, has a typographical error. The approved hours should read 20,821 hours rather than 20,281 hours. Also, there is a decrease in the capital/startup and O&M costs due to a difference in rounding numbers. There is no burden change. In the previous ICR, the cost figure was rounded-up to the nearest thousand. In this ICR, the figure is rounded to the nearest dollar.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 69 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may 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-2008-0289. 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 Avenue, 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) 566-1927. 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-2008-0289 and OMB Control Number 2060-0522 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (Renewal)

Burden item	(A) Person - hours per occurrence	(B) No. of occurrence per respondent per year	(C) Person- hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical Person - hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person - hours per year (Ex0.1)	(H) Cost, \$ ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read instructions	4	1	4	1	4	0.2	0.4	\$371.35
B. Required activities								
Initial oxidizer performance test ^{c, e}	280	1	280	1	280	14	28	\$25,994.64
Repeat oxidizer performance test ^{c, e, f}	280	1	280	0.2	56	2.8	5.6	\$5,179.44
Initial capture performance test ^{c, e}	215	1	215	1	215	10.75	21.5	\$19,960.16
Repeat capture performance test ^{c, e, f}	215	1	215	0.2	43	2.15	4.3	\$3,992.03
Startup, shutdown, malfunction plan ^c	40	1	40	1	40	2	4	\$3,713.52
Solvent recovery system compliance determination ^{c, p}	4	12	48	13.2	633.6	31.68	63.36	\$58,822.16
Emission rate limit compliance determination	4	12	48	140	6,720	336	672	\$623,871.36
Coordination with suppliers ^g	40	1	40	140	5,600	280	560	\$519,892.80
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report								
Initial notification ^c	2	1	2	1	2	0.1	0.2	\$185.68
Notification of construction/ reconstruction ^c	2	1	2	1	2	0.1	0.2	\$185.68
Notification of anticipated startup ^c	2	1	2	1	2	0.1	0.2	\$185.68
Notification of actual startup ^c	2	1	2	1	2	0.1	0.2	\$185.68
Notification of compliance status ^c	4	1	4	1	4	0.2	0.4	\$371.35
Notification of performance test ^{c, e}	2	1	2	1	2	0.1	0.2	\$185.68

Burden item	(A) Person - hours per occurrence	(B) No. of occurrence per respondent per year	(C) Person- hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical Person - hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person - hours per year (Ex0.1)	(H) Cost, \$ ^b
Performance test report ^{c, e}	40	1	40	1	40	2	4	\$3,713.52
Report of monitoring exceedances ^{c, h, k}	16	2	32	6.6	211.2	10.56	21.12	\$19,607.39
Report of no excess emissions ^{c, i, k}	8	2	16	59.4	950.4	47.52	95.04	\$88,233.23
Startup, shutdown, malfunction report ^{c, j, k}	8	2	16	6.6	105.6	5.28	10.56	\$9,803.70
Report of compliance deviation ^{d, k, l}	16	2	32	7.4	236.8	11.84	23.68	\$21,984.04
Report of no compliance deviations ^{d, k, m}	8	2	16	66.6	1,065.6	53.28	106.56	\$98,928.18
Reporting Subtotal	1192	48	1336	451.2	16215.2	810.76	1621.52	\$1,505,367.27
					18,647.48			
4. Recordkeeping Requirements								
A. Read instructions	See 4B							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system	N/A							
E. Time to enter information								
Records of all information required by standards ⁿ	0.25	52	13	140	1,820	91	182	\$168,965.52
F. Time to train personnel	N/A							
G. Time to adjust existing ways to comply with previously applicable requirements	N/A							
H. Time to transmit or disclose information ^o	0.25	2	0.5	140	70	3.5	7	\$6,498.66
I. Time for audits	N/A							
Recordkeeping subtotal	0.5	54	13.5	280	1,890	94.5	189	175,464.18
						2,173.50		
Subtotals Labor Burden and cost					18,105.2	905.26	1,810.52	\$1,680,831.02
TOTAL LABOR BURDEN AND COST (rounded)						20,821		\$1,680,831

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 140, which equates to 66 coating and printing sources, and 74 slashing, dyeing, and finishing sources. There will be one additional new source per year that will become subject to the rule over the three-year period of this ICR.
- ^b This ICR uses the following labor rates: \$97.46 per hour for Executive, Administrative, and Managerial labor; \$83.71 per hour for Technical labor, and \$42.55 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "Table 2: Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.
- ^c This applies only to coating and printing facilities.
- ^d This applies only to slashing, dyeing and finishing facilities.
- ^e Occurs one time for new sources and involves one-time startup costs associated with initial compliance determination and acquisition, installation, and utilization of technology and systems needed to support recordkeeping and reporting.
- ^f It is assumed that 20 percent of respondents will have to repeat performance tests.
- ^g We have assumed that it will take 40 hours for each respondent to coordinate with suppliers.
- ^h We have assumed that 10 percent of respondents will report monitoring exceedances.
- ⁱ We have assumed that 90 percent of respondents will report no excess emissions.
- ^j We have assumed that 10 percent of respondents will file a startup, shutdown, malfunction reports.
- ^k Semiannual reports are required.
- ^l It is assumed that 10 percent of respondents will report compliance deviations.
- ^m It is assumed that 90 percent of respondents will report no compliance deviations.
- ⁿ It is assumed that all of the respondents will be required to record information on a weekly basis.
- ^o It is assumed that respondents will be required to transmit/disclose information on a semiannual basis.
- ^p It is assumed that 20 percent of the coating and printing facilities will use solvent recovery equipment (20x66=13.2).

Table 2: Average Annual EPA Burden - NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
1. Initial performance test ^c	495	1	495	1	495	24.75	49.5	\$23,077.39
2. Repeat performance test preparations ^{c,e}	4	0.1	0.4	1	0.4	0.02	0.04	\$18.65
3. Repeat performance test ^{c,e}	495	0.1	49.5	1	49.5	2.47	4.95	\$2,307.45
4. Report Review								
Notification of applicability	2	1	2	1	2	0.1	0.2	\$93.24
Notification of construction/ Reconstruction	2	1	2	1	2	0.1	0.2	\$93.24
Notification of anticipated Startup	2	1	2	1	2	0.1	0.2	\$93.24
Notification of actual startup	2	1	2	1	2	0.1	0.2	\$93.24
Notification of initial performance test ^c	2	1	2	1	2	0.1	0.2	\$93.24
Notification of compliance status ^c	2	1	2	1	2	0.1	0.2	\$93.24
Review of initial performance test report ^c	8	1	8	1	8	0.4	0.8	\$372.97
Review of repeat performance test report ^{c,f}	8	0.1	0.8	1	0.8	0.04	0.08	\$37.30
Review of excess emissions report ^{c,g}	8	1	8	6.6	52.8	2.64	5.28	\$2,461.59
Review of no excess emissions report ^{c,h}	2	1	2	59.4	118.8	5.94	11.88	\$5,538.58
Review of startup, shutdown, malfunction reports ^{c,i}	2	1	2	13.2	26.4	1.32	2.64	\$1,230.80
Review of compliance deviations report ^{d,j}	8	1	8	7.4	59.2	2.96	5.92	\$2,759.96

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
Review of no compliance deviations reports ^{d, k}	2	1	2	66.6	133.2	6.66	13.32	\$6,209.91
TOTAL ANNUAL BURDEN AND COST (rounded)						1,099		\$44,574

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 140, which equates to 66 coating and printing sources, and 74 slashing, dyeing, and finishing sources. There will be one additional new source per year that will become subject to the rule over the three-year period of this ICR.
- ^b This cost is based on the following labor rates which incorporate a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$56.02 (GS-13, Step 5, \$35.01 x 1.6), Technical rate of \$41.57 (GS-12, Step 1, \$25.98 x 1.6), and Clerical rate of \$22.50 (GS-6, Step 3, \$14.06 x 1.6). These rates are from the Office of Personnel Management (OPM) “2005 General Schedule” which excludes locality rates of pay.
- ^c This applies only to coating and printing facilities.
- ^d This applies only to slashing, dyeing and finishing facilities.
- ^e We have assumed that 10 percent of new sources will have to repeat performance test preparations and testing.
- ^f Assume that 10 percent of new sources will review the repeat performance test report.
- ^g We have assumed that 10 percent of respondents will be engaged in the reviewing of excess emissions reports.
- ^h We have assumed that 90 percent of respondents will be engaged in the reviewing of no excess emissions reports.
- ⁱ We have assumed that 20 percent of respondents will have to review the startup, shutdown, malfunction reports.
- ^j We have assumed that 10 percent of respondents will review the compliance deviations report.
- ^k We have assumed that 90 percent of respondents will review the no compliance deviations report.