

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP FOR Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (Renewal),  
EPA ICR Number 1739.06, OMB Control Number 2060-0335

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry were proposed on March 14, 1995 (60 FR 13664), promulgated on May 30, 1996 (61 FR 27131), and amended on May 24, 2006 (71 FR 29792). These standards apply to the following facilities in 40 CFR subpart KK: publication rotogravure, product and packaging rotogravure, and wide-web flexographic printing presses at major sources, existing or commencing construction or reconstruction after the effective date of this subpart. This standard also applies to owners or operators who choose to commit to and meets the criteria of establishing the facility to be an area source of hazardous air pollutants (HAP). This information is being collected to assure compliance with 40 CFR part 63, subpart KK.

Owners or operators of the affected facilities described must make one-time-only notifications. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. Monitoring requirements specific to the NESHAP for the Printing and Publishing Industry in subpart KK, provide information on the operation of the emissions control device and compliance with the (opacity) standard. Semiannual reports of excess emissions are required.

Any owner and 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 United States 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 that each plant site has only one respondent (i.e., the owner/operator of the plant site).

We have determined that there are an estimated 352 respondents currently subject to this rule. Of the 352 facilities, 152 are major sources and 200 are area sources that are currently subject to the standard. It is estimated that no additional sources will become subject to the standard over the next three years.

All of the printing and publishing facilities in the United States are owned and operated by the printing and publishing industry (the “Affected Public”). None of the facilities in the United States are owned by state, local, tribal or the Federal government. They are all privately, owned for-profit businesses. The burden to the “Affected Public” is listed below in Table 1: Annual Respondent Burden and Cost - NESHAP for Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (Renewal). The Federal government burden associated with the review of reports submitted by the respondent is shown below in Table 2: Average Annual EPA Burden - NESHAP for Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (Renewal).

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (ICR) without any “Terms of Clearance.”

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

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

The EPA is charged under section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

- (A) Establish and maintain such records;
- (B) make such reports;
- (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods;
- (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe);
- (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical;
- (F) submit compliance certifications in accordance with Section 114(a)(3);
- and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from the printing and publishing industry cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP standards were promulgated for this source category at 40 CFR part 63, subpart KK.

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

The information will be used by the delegated authority (state agency or Regional Administrator if there is no delegated state agency) to ensure that the emissions limits and other requirements are being achieved. Based on review of the recorded information at the site and the reported information, the delegated permitting authority can identify facilities that may not be in

compliance and decide which plants, records, or processes may need inspection.

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

#### **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 their own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

#### **3(b) Public Notice Required Prior to ICR Submission to OMB**

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (74 FR 32580) on July 8, 2009. 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, is the Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based, in part with our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. We contacted the Printing Industries of America at (434) 591-0527, and the Flexible Packaging Association, at (410) 694-0823.

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

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful 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 proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

#### **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 allows EPA to establish the compliance history of a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond the five years. Without the five-year record retention, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

### **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/NAIC Codes**

The respondents to the recordkeeping and reporting requirements are the printing and publishing industry. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, which correspond to the North American Industry Classification System (NAICS) codes, are listed below for source category description.

<b>Standard (40 CFR, part 63, subpart KK)</b>	<b>NAICS Codes</b>
Textile Bag Mills	314911
Setup Paperboard Box Manufacturing	322213
Corrugated and Solid Fiber Box Manufacturing	322211
Non-folding Sanitary Food Container Manufacturing	322215
Folding Paperboard Box Manufacturing	322212
Coated and Laminated Packaging Paper and Plastics film Manufacturing	322221
Plastics, Foil, and Coated Paper Bag Manufacturing	322223
Plastics Bag Manufacturing	326111
Uncoated Paper and Multiwall Bag Manufacturing	322224
Sanitary Paper Product Manufacturing	322291

<b>Standard (40 CFR, part 63, subpart KK)</b>	<b>NAICS Codes</b>
All Other Converted Paper Product Manufacturing	322299
Corrugated and Solid Fiber Box Manufacturing	322211
Die-Cut Paper and Paperboard Office Supplies Manufacturing	322231
Coated and Laminated Paper Manufacturing	322222
Periodical Publishers	511120
All Other Publishers (except newspaper, magazine, books, directory, database, music, and greeting card publishers)	511199
Commercial Gravure Printing	323111
Commercial Flexographic Printing	323112
Other Commercial printing	323119
All Other Plastics Product Manufacturing	326199
Laminated Aluminum Foil Manufacturing for Flexible Packaging Uses	322225
Resilient Floor Covering Manufacturing	326192

#### **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**

In this ICR, all the data recorded or reported is required by the NESHAP for Printing and Publishing Industry (40 CFR Part 63, Subpart KK).

A source must make the following reports:

<b>Notifications</b>	
Initial notification	63.5(d), 63.9(b), 63.10(f), 63.830(b)
Notification of change	63.821(a)(6), 63.820(a)(2)
Notification of compliance status	63.9(h), 63.830(b)
Initial performance test and evaluation	63.7(b), 63.9(e), (g), (j), 63.830(b)
Rescheduled initial performance test	63.7(b)(2)
Initial performance test results	63.6(g), 63.10(d-e), 63.830(b)
Opacity or visible emissions	63.10(d)(3)
Periodic startup, shutdown, malfunction reports	63.6(e), 63.10(a), (d), 63.830(b)

<b>Notifications</b>	
Summary report	63.10(e), 63.830(b)
Excess emission and continuous monitoring system (CMS) performance reports	63.10(a), (e), 63.830(b)

A source must keep the following records:

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

### Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are not widely used. At this time, it is estimated that 20 percent of the respondents use electronic reporting.

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

<b>Respondent Activities</b>	
Read instructions.	
Install, calibrate, maintain, and operate CMS 63.824(b), 63.825(c)(d), 63.828(a), 63.8(c).	
Perform initial performance test, Reference Method 311 test, and repeat performance tests if necessary. Conduct CMS performance evaluation.	
Write the notifications and reports listed above.	
Enter information required to be recorded above.	
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.	

<b>Respondent Activities</b>
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 monitoring equipment that provides parameter data in an automated way (e.g., continuous parameter monitoring system). 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, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the OTIS.

### **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 operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs.

Information contained in the reports is entered into OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters.

EPA edit, store, retrieve and analyze the data.

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

### **5(c) Small Entity Flexibility**

The 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 to be the minimum requirements 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 Respondent Burden - NESHAP for Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (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. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

### **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 58,215 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

### **6(b) Estimating Respondent Costs**

#### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$114.77 (\$54.65 + 110%)
Technical	\$97.59 (\$46.47 + 110%)



Clerical            \$48.26 (\$22.98 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2009, 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 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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(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)
Temperature	\$7,000	0	\$0	\$9,000	46	\$414,000
Total			\$0			\$414,000

The total capital/startup costs for this ICR are zero. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$414,000. This is the total of column G.

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 \$414,000.

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

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA 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 \$19,498.

This cost is based on the average hourly labor rate as follows:

Managerial	\$61.36 (GS-13, Step 5, \$38.35 + 60%)
Technical	\$45.52 (GS-12, Step 1, \$28.45 + 60%)
Clerical	\$24.64 (GS-6, Step 3, \$15.40 + 60%)

These rates are from the Office of Personnel Management (OPM) 2009 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden - NESHAP for Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (Renewal).

#### **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 352 existing respondents will be subject to the standard. Of the 352 sources 152 are major sources and 200 are area sources. It is estimated that no additional respondents per year will become subject to the standard over the three-year period of this ICR.

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

<b>Number of Respondents</b>					
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	0	152	200	0	352
2	0	152	200	0	352
3	0	152	200	0	352
Average	0	152	200	0	352

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 352.

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 $E=(B \times C)+D$
Notification of initial and HAP usage	0	1	0	0
Notification of compliance status	0	1	0	0
Notification of performance test	0	1	0	0
Report of performance test	0	1	0	0
Startup/shutdown/malfunction report	30	2	0	60
Semiannual excess emission and CMS Performance report	76	2	0	152
Records of HAP usage (area source)	200	2	0	400
Total Number of Annual Responses			Total	612

The number of Total Annual Responses is 612.

The total annual labor costs are \$5,474,997. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (Renewal).

### **6(e) Bottom Line Burden Hours Burden Hours 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 hours are 58,215. Details regarding these estimates may be found below in Table 1. Annual Respondent Burden and Cost – NESHAP for Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 95 hours (rounded) per response.

The total annual capital/startup and Operation and Maintenance (O&M) costs to the regulated entity are \$414,000.

#### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 419 labor hours at a cost of \$19,498. See below Table 2: Annual Agency Burden and Cost –

NESHAP for Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (Renewal).

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

There is a change in this ICR as compared to the previous one. Based on our discussions with the printing and publishing industry representatives, the printing industry, in particular, will be experiencing essentially a flat production in the coming years with no new facilities anticipated. This ICR also reflects the most recent hourly labor rates which takes into account the managerial, technical and clerical burdens as compared to the previous ICR. Corrections include a minor mathematical error and recalculation of the number of responses; as a result, the total number of responses and the total burden hours have increased since the previous ICR, despite the expected flat production in the coming years.

There is a small increase in the capital/startup and operations and maintenance (O&M) costs from the previous ICR which is due to rounding-up the number of affective respondents.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 95 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; to 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; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of information; to search data sources; to complete and review the collection of information; and to 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-2009-0393. 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 content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search" than 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, N.W., 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) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0393 and OMB Control Number 2060-0335 in any correspondence.

**Part B of the Supporting Statement**

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

**Table 1: Annual Respondent Burden and Cost – NESHAP Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(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>b</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
a. Read instructions <sup>c</sup>	4	1	4	2	8	0.4	0.8	\$865.24
b. Required activities								
Initial performance test <sup>d</sup>	240	1	240	0	0	0	0	\$0
Repeat performance tests <sup>d</sup>	240	1	240	0	0	0	0	\$0
Install CMS <sup>d</sup>	100	1	100	0	0	0	0	\$0
Develop CMS/QC program and test plan <sup>d</sup>	100	1	100	0	0	0	0	\$0
Conduct CMS performance evaluation <sup>d</sup>	300	1	300	0	0	0	0	\$0
Maintain, adjust, and calibrate CMS <sup>e</sup>	6	52	312	46	14,352	717.6	1,435.2	\$1,552,233.38
c. Create information	See 3B							
d. Gather existing information	See 3E							
e. Write report								
New Sources								
Notification of initial and HAP usage <sup>d</sup>	4	1	4	0	0	0	0	\$0
Notification of compliance status <sup>d</sup>	4	1	4	0	0	0	0	\$0
Notification of performance test <sup>d</sup>	2	1	2	0	0	0	0	\$0
Report of performance test <sup>d</sup>	40	1	40	0	0	0	0	\$0
Existing Sources								
Startup, shutdown, malfunction report <sup>f</sup>	2	2	4	30	120	6	12	\$12,978.54
Semiannual excess emission and CMS performance report <sup>g</sup>	16	2	32	76	2,432	121.6	243.2	\$263,031.74
Subtotal for Reporting Requirements						19,448.8		
4 Recordkeeping requirements								
a. Read instructions	See 3A							
b. Plan activities	N/A							
c. Implement activities	N/A							

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(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>b</sup>
d. Develop record system <sup>d</sup>	40	1	40	0	0	0	0	\$0
e. Time to enter information								
Records of maintenance <sup>h</sup>	4	52	208	105	21,840	1,092	2,184	\$2,362,094.28
Records of startup, shutdown, and malfunction <sup>i</sup>	2	52	104	30	3,120	156	312	\$337,442.04
<sup>i</sup> Records of malfunction or inoperative CMS	2	2	4	30	120	6	12	\$12,978.54
Records of applicability determination <sup>d</sup>	2	1	2	0	0	0	0	\$0
Records of CMS operation <sup>j</sup>	2	52	105	46	4,830	241.5	483	\$522,386.23
Records of liquid-liquid material balances; HAP, volatile material, solids and materials applied, operating parameters <sup>k</sup>	2	12	24	105	2,520	126	252	\$272,549.34
Records of materials used by incidental printers <sup>l</sup>	40	1	40	2	80	4	8	\$8,652.36
Records of HAP usage (area sources) <sup>m&amp;n</sup>	0.5	12	6	200	1,200	60	120	\$129,785.40
f. Time to train personnel	See 3A							
g. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						38,766.5		
					50,622	2,531.1	5,062.2	\$5,474,997.09
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						58,215.3 58,215 (rounded)		\$5,474,997

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents potentially subject to this rule is 352. Of the 352 facilities, 152 are major sources, and 200 are area sources. There will be no additional new sources over the three-year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$114.77 per hour for Executive, Administrative, and Managerial labor; \$97.59 per hour for Technical labor, and \$48.26 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2009, 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.

<sup>c</sup> We have assumed that two existing facilities will need to read and review instructions.

<sup>d</sup> We have assumed that there will be no new sources during the three-year period of this ICR.

- <sup>e</sup> We have assumed that 30 percent of respondents (major source) will be required to maintain, adjust, and calibrate CMS.
- <sup>f</sup> We have assumed that 20 percent of the respondents (major source) will have startup, shutdown, malfunction incidents with equipment or inoperative CMS reports to complete.
- <sup>g</sup> We have assumed that 46 facilities are fitted with CMS control, and an additional 30 facilities that may encounter excess emissions.
- <sup>h</sup> We have assumed that these facilities do not have CMS installed in them.
- <sup>i</sup> We have assumed that 20 percent of respondents will enter information on startup, shutdown, malfunction problems with equipment or inoperative CMS.
- <sup>j</sup> We have assumed that 46 respondents (major source) will enter information on CMS operations.
- <sup>k</sup> We have assumed that these facilities do not have CMS installed in them.
- <sup>l</sup> We have assumed that 2 existing facilities will be required to enter information on records of materials used by incidental printers.
- <sup>m</sup> We have assumed that 200 area sources, which includes products and packaging rotogravure and wide-web flexographic printing presses, are subject to recordkeeping requirements, and are required to keep a monthly record of HAP usage to show that they are meeting the limit.
- <sup>n</sup> We have assumed that it will take each respondent 0.5 hours to record HAP usage.



**Table 2: Average Annual EPA Burden - NESHAP Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (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 <sup>a</sup>	(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, \$ <sup>b</sup>
Required activities								
New sources								
Initial performance tests <sup>c</sup>	24	1	24	0	0	0	0	\$0
Repeat performance tests <sup>c</sup>	24	1	24	0	0	0	0	\$0
Report review								
New sources								
Notification of initial startup <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of compliance status <sup>c</sup>	4	1	4	0	0	0	0	\$0
Notification of performance test <sup>c</sup>	1	1	1	0	0	0	0	\$0
Review test results <sup>c</sup>	8	1	8	0	0	0	0	\$0
Existing sources								
Semiannual excess emissions and CMS performance report <sup>d</sup>	2	2	4	75	304	15.2	30.4	\$15,519.81
Periodic startup, shutdown, malfunction report <sup>e</sup>	2	1	2	30	60	3	6	\$3,978.00
Subtotals Labor Burden and cost					364	18.2	36.4	\$19,497.81
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>						418.6 419 (rounded)		\$19,498

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents potentially subject to this rule is 352. Of the 352 facilities, 152 are major sources, and 200 are area sources. There will be no additional new sources over the three-year period of this ICR.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$61.36 Managerial rate (GS-13, Step 5, \$38.35 x 1.6), \$45.52 Technical rate (GS-12, Step 1, \$28.45 x 1.6), and \$24.64 Clerical rate (GS-6, Step 3, \$15.40 x 1.6). These rates are from the Office of Personnel Management (OPM) 2009 General Schedule, which excludes locality rates of pay.

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

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

<sup>e</sup> We have assumed that 20 percent of sources will be required to submit periodic startup, shutdown, malfunction report.