

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS FOR FLEXIBLE VINYL AND URETHANE COATING AND PRINTING (40 CFR PART 60, SUBPART FFF) (Renewal), EPA ICR Number 1157.09, OMB Control Number 2060-0073

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF)

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Flexible Vinyl and Urethane Coating and Printing (40 CFR part 60, subpart FFF) were proposed on January 18, 1983, and promulgated on June 29, 1984. These standards apply to the following facilities in subpart FFF: each rotogravure printing line used to print or coat flexible vinyl or urethane products, and for which construction, modification or reconstruction commenced after January 18, 1983. This information is being collected to assure compliance with these regulations.

Approximately 20 sources are currently subject to the regulation, and it is estimated that one additional source will become subject to the standard over the next three years, for an average of 0.33 new sources per year. These figures are based on estimates from the most recently approved Information Collection Request (ICR) renewal which were based on queries conducted in the EPA's Air Facility System (AFS) through the Online Tracking Information System (OTIS). The cost of this Information Collection Request (ICR) will be \$55,831 in labor costs.

OMB approved the currently active ICR without any "Terms of Clearance."

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

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

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

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

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, volatile organic compounds (VOC) emissions from the printing and coating of flexible vinyl and urethane products either 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 FFF.

2(b) Practical Utility/Users of the Data

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

The required notifications are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices (if this method is chosen to comply with the regulation) are properly installed and operated and the standard is being met. The performance test may also be observed. Performance test reports are needed as these are the Agency's record of a source's initial capability to comply with the emission standard, and serve as a record of the operating conditions under which compliance was achieved. For facilities using control equipment to meet this standard, the operating conditions may include temperature or volatile organic compound concentration.

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

determinations. The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NSPS continue to operate the control equipment and achieve compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

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

The requested recordkeeping and reporting are required under 40 CFR part 60, subpart FFF.

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 on July 8, 2009 (74 FR 32580). No comments were received on the burden published in the Federal Register.

3(c) Consultations

For this information collection, the previous ICR renewal was used to obtain burden estimates since this ICR renewal was processed under the “Expedited Approach” option provided in May 1, 2008 guidance. Per this guidance, all data and assumptions from the previous ICR renewal were used as the basis for estimating the hourly and cost burdens associated with this renewal.

Based on information from a previous ICR renewal, there will be an estimated 20 respondents with one industry growth expected over the next three years. These resources include data available on the Air Facility System (AFS) database maintained by the Office of Compliance (April 14, 2003). We also retrieved data from the Toxic Release Inventory System (TRIS) maintained by the Office of Environmental Information. In addition, we contacted all the facilities listed in our queries for confirmation.

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

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

3(f) Confidentiality

The required information has been determined not to be confidential. However, any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, c1, part 2, subpart B - Confidentiality of Business Information (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

The reporting or recordkeeping requirements in the standard do not contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/NAICS Codes

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

4(b) Information Requested, including record keeping requirements

(i) Data Items

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

A source must make the following reports:

Reports for 40 CFR part 60, subpart FFF	
Notification of construction/reconstruction	60.7(a)(1)
Notification of physical or operational change	60.7(a)(4)
Initial performance test	60.8(d)
Notification of delay of/and rescheduled initial performance test(s)	60.8(d)
Notification of actual startup	60.7(a)(3)
Initial performance test results	60.8(a), 60.585(a)
Demonstration of continuous monitoring system	60.7(a)(5)
Semiannual reports	60.7(c) and 60.7(d) 60.585(b)

A source must maintain the following records:

Recordkeeping for 40 CFR part 60, subpart FFF	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative.	60.7(b) 60.584(d)
Records for sources with continuous monitoring systems	60.7(d)
Maintain file of all measurements	60.7(e) 60.583(b) and 60.583(c)
Records of performance test conditions	60.8(c)
Records of operating conditions for control equipment (i.e., temperature or VOC concentration)	60.584(a)(2) 60.584(b)(2) 60.584(c)(2)

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 still not widely used. At this time, it is estimated that approximately 20 percent of the respondents

use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for VOC concentration or temperature.
Perform initial performance test, Reference Methods 24, 25, 1, 2, 3, and 4 tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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.

Agency Activities

Input, analyze, and maintain data in the Air Facility System (AFS) database.
--

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions (VOC concentration or temperature) under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into the AFS which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance 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, and EPA Regional Offices and Headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

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

5(c) Small Entity Flexibility

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

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Average Annual Industry Burden - NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR part 60, subpart FFF) (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 594 (rounded) person-hours (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	\$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% to account for the benefit packages available to those employed by private industry.

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

The type of industry costs associated with the information collection activity in the regulations are for labor and continuous emission monitoring (CEM). The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

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

The type of industry costs associated with the information collected activity in the regulations are for labor and continuous emission monitoring (CEM). The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Startup Cost for One Affected Facility	(C) Number of New Affected Facilities to Startup	(D) Total Startup (B X C)	(E) Annual O&M Costs for One Affected Facility	(F) Number of Affected Facilities with O&M	(G) Total O&M (E X F)
Temperature or feed rate monitor	\$20,000	0.33	\$6,600	\$9,000	20	\$180,000

The total capital/startup cost for this ICR is \$6,600. This is the total of column D in the above table. The total operation and maintenance (O&M) costs for this ICR are \$180,000. This is the total of column G.

The total respondent non-labor costs have been calculated as the addition of the capital/startup costs, and the annual operation and maintenance costs. The average annual cost for capital/startup and operation and maintenance costs to industry of the next three years of the ICR are estimated to be \$186,600.

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 \$7,812 (rounded) and is shown below in Table 2.

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% to account for the benefit packages available to government employees. Details upon which this estimate is based

appear below in Table 2: Average Annual Agency Burden - NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR part 60, subpart FFF) (Renewal).

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

Respondent Universe and Number of Responses Per Year						
Regulation Citation	(A) Average Number of New Respondents per Year	(B) Number of Reports for New Source	(C) Number of Existing Respondents	(D) Number of Reports for Existing Sources	(F) Number of Respondents that keep records but do not submit reports	(E) Total Annual Responses = (AxB)+(CxD) +F
40 CFR part 60, subpart FFF	0.33	2	20	2	0	40.66

The number of total respondents is 20.33, rounded to 20. This number is the sum of column A and column C of the Respondent Universe and Number of Responses Per Year table. This represents the number of existing sources plus the number of new sources averaged over the three-year period (i.e., the total of the number of new respondents over the three-year period divided by three years).

The number of Total Annual Responses is 41 (rounded). This is the number in column E of the Respondent Universe and Number of Responses Per Year table.

The total annual labor costs are \$55,831. Details upon which this estimate is based appear in Table 1: Average Annual Industry Burden and Cost - NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR part 60, subpart FFF) (Renewal).

The total annual capital and O&M costs to the regulated entity are \$186,600. These costs are detailed in section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

6(e) Bottom Line Burden Hours and Cost Tables

The bottom line burden hours and cost tables for both the Agency and the respondents are attached in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 594 hours (rounded), with annual labor costs of \$55,831. Details regarding these estimates may be found below in Table 1. Annual Respondent Burden and Cost - NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR part 60, subpart FFF) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 15 hours per response.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 90 labor hours at a labor cost of \$7,812. The average annual travel expenses over the next three years cost \$189.75. Thus, the total average annual Agency burden is estimated to cost \$7,812. See below Table 2: Average Annual Agency Burden - NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR part 60, subpart FFF) (Renewal).

6(f) Reasons for Change in Burden

The regulations have not changed over the past three years and are not anticipated to change over the next three years. However, an increase in labor hours for respondents and small decrease in labor hours for the Agency occurred due to an incorrect calculation of the number of hours in the previous ICR. There was also an increase in O&M costs due to an error in the number of affected facilities in the previous ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 15 (rounded) hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA's regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2009-0420. 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) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0420 and OMB Control Number 2060-0073 in any correspondence.

Part B of the Supporting Statement

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