

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

| REPORTING/RECORDKEEPING REQUIREMENT | (A) Respondent Hours per Occurrence (Technical hours) | (B) Number of Occurrences per Respondent per Year | (C) Hours per Respondent per Year (C=A x B) | (D) Number of Respondents per Year | (E) Technical Hours per Year @ \$97.59 (E=C x D) | (F) Management Hours per Year @ \$114.77 (F= E x 0.05) | (G) Clerical Hours per Year @ \$48.26 (G= E x 0.1) | Total Labor Costs per Year |
|--|--|--|---|---|---|---|---|----------------------------------|
| 1. APPLICATIONS | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 2. SURVEY AND STUDIES | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 3. REPORTING REQUIREMENTS | | | | | | | | |
| New Sources ^a | | | | | | | | |
| A. Read Instructions ^b | 0.87 | 1 | 0.87 | 0.33 | 0.29 | 0.01 | 0.03 | \$31.04 |
| B. Required Activities | | | | | | | | |
| New Sources | | | | | | | | |
| Initial performance test ^c | 243.48 | 1 | 243.48 | 0.33 | 80.35 | 4.02 | 8.03 | \$8,689.98 |
| Repeat performance test ^d | 243.48 | 1 | 243.48 | 0.07 | 17.04 | 0.85 | 1.70 | \$1,843.33 |
| C. Create Information | -----Included in 3b----- | | | | | | | |
| D. Gather Existing Information | -----Included in 3b----- | | | | | | | |
| E. Write Report | | | | | | | | |
| New Sources | | | | | | | | |
| Notification of construction/reconstruction ^e | 1.74 | 1 | 1.74 | 0.33 | 0.57 | 0.03 | 0.06 | \$62.07 |
| Notification of initial performance test ^f | 1.74 | 1 | 1.74 | 0.33 | 0.57 | 0.03 | 0.06 | \$62.07 |
| Report of initial performance test | -----Included in 3b----- | | | | | | | |
| Existing Plants | | | | | | | | |
| Submit semi-annual report ^g | 3.48 | 2 | 6.96 | 20 | 139.13 | 6.96 | 13.91 | \$15,047.58 |
| | Total Reporting Hours by Labor Category | | | | 140.28 | 7.01 | 14.03 | |
| TOTAL REPORTING BURDEN | | | | | | 161.3 | Hours | \$15,172 |
| 4. RECORDKEEPING REQUIREMENTS | | | | | | | | |
| A. Read Instructions | -----Included in 3a----- | | | | | | | |
| B. Plan Activities | -----Included in 3b----- | | | | | | | |
| C. Implement Activities | -----Included in 3b----- | | | | | | | |
| D. Develop Record System | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| E. Time to Enter Information | | | | | | | | |
| Records of startup, shutdown and malfunctions ^h | 1.30 | 2 | 2.61 | 20 | 52.17 | 2.61 | 5.22 | \$5,642.84 |
| Records of VOC, temperature and CMS maintainan | 0.22 | 52 | 11.30 | 20 | 226.09 | 11.30 | 22.61 | \$24,452.32 |
| F. Audits | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| | Total Recordkeeping Hours by Labor Category | | | | 375.94 | 18.80 | 37.59 | |
| TOTAL RECORDKEEPING BURDEN | | | | | | 432.3 | Hours | \$40,659 |
| | Total Hours by Labor Category | | | | 516.22 | 25.81 | 51.62 | |
| TOTAL ANNUAL INDUSTRY COST BURDEN (rounded) | | | | | | 593.6 | Hours | \$55,831 |

Assumptions:

a. Number of new facilities (per year): 0.33

- b. Time required to read instructions (hours): 1
- c. Time required to complete performance test (hours): 280
- d. Rate of failed performance tests: 20%
- e. Time required for notification preparation (hours): 2
- f. Time required for notification of initial performance test (hours): 2
- g. Time required to compile data for semiannual report (hours): 4
- h. Time required to record startup, shutdown, and malfunction (hours): 1.5
- i. Time required to record VOC, temperature and CMS maintenance (hours): 0.25

(Renewal)

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

| REPORTING/RECORDKEEPING REQUIREMENT | (A) EPA Hours per Occurrence (Technical hours) | (B) Number of Occurrences per Plant per Year | (C) EPA Hours per Year (C=A x B) | (D) Plants per Year | (E) Technical Hours per Year @ \$45.52 (E=C x D) | (F) Management Hours per Year @ \$61.36 (F= E x 0.05) | (G) Clerical Hours per Year @ \$24.64 (G= F x | Costs per Year |
|---|---|--|--|---------------------------|--|--|---|-------------------|
| <u>Required Activities</u> | | | | | | | | |
| New Plant | | | | | | | | |
| Initial performance tests ^a | 20.87 | 1 | 20.87 | 0.33 | 6.89 | 0.34 | 0.69 | \$351.59 |
| Repeat performance tests ^b | 20.87 | 1 | 20.87 | 0.007 | 0.14 | 0.01 | 0.01 | \$23.66 |
| <u>Report Review</u> | | | | | | | | |
| New Plant | | | | | | | | |
| Notification of construction ^c | 1.74 | 1 | 1.74 | 0.33 | 0.57 | 0.03 | 0.06 | \$44.85 |
| Notification of initial startup ^d | 0.43 | 1 | 0.43 | 0.33 | 0.14 | 0.01 | 0.01 | \$23.94 |
| Notification of actual startup ^e | 0.43 | 1 | 0.43 | 0.33 | 0.14 | 0.01 | 0.01 | \$23.94 |
| Notification of initial test | 0.43 | 1.2 | 0.52 | 0.33 | 0.17 | 0.01 | 0.02 | \$25.34 |
| Review test results ^g | 0.43 | 1.2 | 0.52 | 0.33 | 0.17 | 0.01 | 0.02 | \$25.34 |
| Existing Plants | | | | | | | | |
| Semiannual reports of emission exceedances ^h | 1.74 | 2 | 3.48 | 20 | 69.57 | 3.48 | 6.96 | \$3,397.00 |
| TOTAL ANNUAL HOURS | | | | | 78 | 4 | 8 | |
| SALARY BURDEN (per year) | | | | | | | | \$3,706.53 |
| ANNUAL TRAVEL EXPENSES ⁱ | | | | | | | | |
| (1 person x .33 plant/year x 3 days/plant x \$75 per diem) + (\$350 round trip/plant x .33 plant/year) = \$189.75 | | | | | | | | \$189.75 |
| TOTAL ANNUAL BURDEN | | | | | | 90 | Hours | \$7,812 |

Assumptions:

- a. Time required to participate with performance test (hours per plant): 24
- b. Rate of failed performance tests: 20%
- c. Time required to review construction notification (hours): 2
- d. Time required to review startup and initial test notifications (hours): 0.5
- e. Notification of actual startup (hours): 0.5
- f. Time required to review initial test notification (hours): 0.5
- g. Time required to review test results (hours): 8
- h. Time required to review semi-annual reports (hours): 2
- i. Round trip airfare to visit plant: \$350