

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE)  
(Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE)  
EPA ICR 1678.07, OMB Control Number 2060-0326

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the regulations published at 40 CFR part 63, subpart EE were proposed on March 11, 1994 and promulgated on December 15, 1994. These regulations apply to the following magnetic tape manufacturing operations located at major sources of hazardous air pollutants (HAP): solvent storage tank, mix preparation equipment, coating operation, waste handling device, and condenser vent in solvent recovery commencing construction or reconstruction after March 11, 1994. Exceptions include research or laboratory facilities, and coating operations that produce a quantity of magnetic tape that is one percent or less of total production. This information is being collected to assure compliance with 40 CFR part 63, subpart EE.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports. Owners, or operators also are 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 sources subject to NESHAP.

Any owner, or 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.

Approximately six sources currently are subject to the standard, and it is estimated that no (zero) additional sources per year will become subject to the regulation in the next three years. It is assumed that three coating lines are to be constructed at existing sources over the next three years, creating one new source per year.

The current active ICR had the following TOC:

The cost of labor assumptions underlying the respondent and agency burden cost

calculations should be updated in the next renewal.

The cost of labor and burden cost calculations have been updated in Tables 1 and 2, attached.

The “Affected Public” are private sector businesses, or other for-profits that manufacture magnetic tape. The burden to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost: NESHAP for Magnetic Tape Manufacturing Operations (40 CFR part 63, subpart EE). The burden to the “Federal government” is attributed entirely to work performed by Federal employees, or government contractors, and may be found in Table 2: Average Annual EPA Burden: NESHAP for Magnetic Tape Manufacturing Operations (40 CFR part 63, subpart EE).

## **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, 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 magnetic tape manufacturing operations cause, or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, NESHAP for this source category were promulgated at 40 CFR part 63, subpart EE.

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

The control of emissions of HAP from magnetic tape manufacturing operations requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of methyl ethyl ketone, toluene, methyl isobutyl ketone, xylene and ethyl benzene, and magnetic particles containing chromium dioxide and cobalt compounds

from magnetic tape manufacturing operations are the result of operation of the facilities. The subject standards are achieved by the capture of methyl ethyl ketone, toluene, methyl isobutyl ketone, xylene and ethyl benzene, and magnetic particle emissions using carbon absorbers, incinerators, or condensers, or reduction using reduced HAP coating mix. The notifications required in the applicable regulations are used to inform the Agency, or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and the regulations are being met. 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. Each compliance emission monitor (CEM) shall record the inlet and outlet concentrations when determining percent efficiency if this is applied to the control device. Thermal incinerators and catalytic incinerators require thermocouples to measure the minimum combustion temperature and temperature across the catalyst bed as established as site-specific operating parameters. Each thermocouple calibration must be verified, or replaced every three months. The semiannual reports are used for problem identification, as a check on source operation and maintenance, 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 NESHAP continue to operate the control equipment in 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 also is used for targeting inspections, and is of sufficient quality to be used as evidence in court.

### **3. Nonduplication, Consultations, and Other Collection Criteria**

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

#### **3(a) Nonduplication**

If the subject standards have not been delegated, the information is sent 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 (74 FR 38004) on July 30, 2009. No comments were received on the burden published in the Federal Register.

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

During a previous renewal of this ICR, the EPA Office of Air Quality Planning and Standards (OAQPS) conducted a review and discussions with industry during the Magnetic Tape Manufacturing Residual Risk Assessment. EPA is required to perform residual risk assessments of technology-based standards and to revise them as necessary, taking into account developments in practices, processes and control technologies, no less frequently than every 8 years. In this instance, EPA determined that no revision was necessary. Results from the Magnetic Tape Manufacturing Residual Risk Assessment were used in preparation of this ICR.

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

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

### **3(e) General Guidelines**

None of these reporting, or recordkeeping requirements violates any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

These standards require affected facilities 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. Also, 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 (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 contains sensitive questions.

## **4. The Respondents and the Information Requested**

#### 4(a) Respondents/SIC and NAICS Codes

The respondents of the recordkeeping and reporting requirements are owners, or operators of magnetic tape manufacturing operations.

Standard	SIC Codes	NAICS Codes
40 CFR part 63, subpart EE	3695	334613 (Magnetic and Optical Recording Media)
40 CFR part 63, subpart EE	2675	322226 (Die-cut Paper and Paperboard and Cardboard)

#### 4(b) Information Requested

##### (i) Data Items

All data in this ICR that is recorded and/or reported is required by 40 CFR part 63, subpart EE.

A source must make the following reports:

Notification Reports	
Notification of intent to construct or reconstruct	63.5(b), 63.9(b), 63.707(a)
Notification and report of construction date	63.9(b)(4), 63.707(a)
Notification of anticipated startup	63.9(b)(4), 63.707(a)
Actual startup notification	63.9(b)(4), 63.707(a)
Notification of applicability of the standard	63.9(b)(2)-(3), 63.707(a), (b), (c)
Develop startup, shutdown, malfunction plan, submit reports	63.6(e)(3), 63.10(d)(5), 63.707(a), 63.707(i)
Develop quality control plan for continuous monitoring systems (CMS)	63.8(d), 63.707(a)
Notification and report of performance tests and results	63.7(b), 63.8(e), 63.9(e), (g), 63.10(d)(2), (e)(2), 63.707(a)
Report of when exceeds HAP usage cutoff or when area source becomes major	63.9(b), 63.9(h), 63.707(j)
Notification and report of compliance status	63.9(h)(2)-(3), 63.707(a)
Notification and report for waiver application	63.7(h), 63.707(a)
Semiannual reports of no excess emissions	63.10(e)(3), 63.707(a), (i)

<b>Notification Reports</b>	
Quarterly reports of monitoring exceedances and excess emissions	63.10(e)(3), 63.707(a), (i)

A source must keep the following records:

<b>Recordkeeping</b>	
Five-year retention of records	63.10(b)(1), 63.706(a), (h)
Records of monitored values, maintenance, startup, shutdown, malfunction	63.10(b)(2), 63.10(c), 63.6(e), 63.706(a)
Records of the freeboard ratio	63.10(b)(2), 63.706(b)
Records of CMS maintenance, calibration	63.8(c), 63.8(d)(3), 63.10(b)(2), 63.10(c), 63.706(a)
Records of performance tests	63.10(b)(2), 63.705, 63.706(a)
Records of material balance calculation	63.10(b)(2), 63.706(a), (d)
Records of HAP usage	63.10(b)(2), 63.706(e)

### Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., inlet and outlet concentrations when determining percent efficiency. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronic reporting systems still are not widely used by the regulatory agencies. It is estimated that approximately 10 percent of the respondents use electronic reporting.

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

<b>Respondent Activities</b>
Read instructions.
Install, calibrate, maintain, and operate CEM for volatile organic compound (VOC) inlet/outlet concentration to measure efficiency of control device, and thermocouples to measure minimum combustion temperature and temperature across catalyst bed for site-specific operating parameters. Maintain records of coating mix HAP concentration and measure freeboard ratio.
Perform initial performance test, EPA Method 24 for VOC content in coatings, EPA Method 18 or EPA Method 25A to determine HAP or VOC concentrations of air exhaust streams, EPA Method 22 to determine visible emissions, and repeat performance tests if necessary.
Write the notifications and reports listed above.

<b>Respondent Activities</b>
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

## **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, startup, shutdown, malfunction plan, and quality control plan for CMS 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. 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 the EPA Office of Compliance. AFS is the EPA database for the collection,

maintenance, and retrieval of compliance and annual emission inventory data for over 100,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

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

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

Previous ICR renewals stated: “There are no small businesses affected by this regulation at present, and no small businesses are expected to become subject to the regulation in the next three years.” However, according to review of the Final Rule (59 FR 64596):

The small business administration’s size standards were used to identify 3 facilities out of the 14 regulated facilities as being a small business [i.e., 21 percent]. Due to the significant impacts expected to be experienced by one of the small facilities, a regulatory flexibility analysis was conducted to assess the feasibility of providing additional flexibility to small businesses complying with the regulation.

This ICR renewal assumes that 21 percent of the current estimated number of affected facilities, or approximately 1 facility, may be a small entity.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Respondent Burden and Cost: NESHAP for Magnetic Tape Manufacturing Operations (40 CFR part 63, subpart EE).

## **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 at 3,396 person-hours. These hours are based on an Agency review and discussions with the industry during initiation of the Magnetic Tape Manufacturing Residual Risk Assessment; Agency studies and background documents from the development of the regulation; Agency knowledge and experience with the NESHAP program; and the previously approved ICR.

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

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

This ICR uses the following labor rates: \$114.49 per hour for Executive, Administrative, and Managerial labor; \$98.20 per hour for Technical labor, and \$48.53 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September, 2009, "Table 2. Civilian workers, by Occupational and Industry group." The rates are from column 1, "Total compensation." The rate has been increased by 110 percent to account for the benefit packages available to those employed by private industry.

Managerial	\$114.49 (\$54.65 + 110%)
Technical	\$98.20 (\$46.47 + 110%)
Clerical	\$48.53 (\$22.98 + 110%)

### **(ii) Estimating Capital and Operations and Maintenance Costs**

This section covers the costs associated with all types of continuous monitoring equipment (e.g., CEMS and continuous parameter monitors). The type of industry costs associated with the information collection activity in the subject standards are both 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 monitors and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operating and Maintenance (O&amp;M) Costs</b>						
<b>(A)</b> Continuous Monitoring Device	<b>(B)</b> Capital/ Startup Cost for One Respondent	<b>(C)</b> Number of New Respondents	<b>(D)</b> Total Capital/ Startup Cost, (B X C)	<b>(E)</b> Annual O&M Costs for One Respondent	<b>(F)</b> Number of Respondent s with O&M	<b>(G)</b> Total O&M, (E X F)
Total enclosure	\$11,000	1	\$11,000	0	0	0
VOC CEM	0	0	0	\$8,000	3	\$24,000
Thermocouples	0	0	0	\$2,000	6	\$12,000

The total Capital/Startup costs for this ICR are \$11,000. This is the total of column D in the above table.

The total Operating and Maintenance (O&M) Costs for this ICR are \$36,000. 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 \$47,000. The continuous monitoring costs that are included in this section consist only of those capital/startup and O&M costs that a source incurs as a result of the standard. Some continuous monitoring costs may not be included in this section. For instance, if a particular industry typically utilizes a control device that must have a continuous monitor (e.g., temperature, pressure drop, etc.) to function properly, and the recordation of additional measurements beyond the minimum are required by the standard, then there is no capital/startup or O&M cost, but there is a labor cost to record the additional readings. Such a cost would not appear in this section, but in the industry burden Section 6(d) below.

### **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 \$2,038 [see Table 2 in Section 6(e)]. This cost is based on the average hourly labor rates below:

Managerial	\$62.27	(GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21	(GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.01	(GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM) “2010 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 in Table 2: Average Annual EPA Burden: NESHAP for Magnetic Tape Manufacturing Operations (40 CFR part 63, subpart EE), below.

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

Based on our research for this ICR, there are approximately six existing sources currently subject to the standard. It is estimated that no (zero) additional sources per year will become subject to the regulation in the next three years.

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 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	6	0	1	6
2	1	6	0	1	6
3	1	6	0	1	6
Average	1	6	0	1	6

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 six.

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

<b>Total Annual Responses</b>					
(A) Number of New Respondents	(B) Number of Reports for New Sources	(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 $E=(A \times B)+(C \times D)+F$
1	4	6	2.2	0	17.2

The number of Total Annual Responses is 17 (rounded).

The total annual labor costs are \$319,607. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NESHAP for Magnetic Tape Manufacturing Operations (40 CFR part 63, subpart EE).

Note that the total annual capital and O&M costs to the regulated entity are \$47,000. 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 appear below. The annual public reporting and recordkeeping burden for this collection of information is estimated to average 200 (rounded) hours per response.

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

There is no change in the estimation methodology of labor hours in this ICR compared to the previous ICR. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for the industry is very low, negative or non-existent. Therefore, the labor hours in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR. However, there is an apparent increase of one labor hour in this ICR compared to the previous ICR, because this ICR carries two decimal places in calculations within Table 1. The previous ICR presented calculation results rounded to a whole number.

The increase in cost to respondents and the Agency is due to labor rate adjustments to reflect rates for fiscal year 2009. This increase is not due to any program changes. Labor rates reflected in the previous ICR were based on fiscal year 2003.

**6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 200 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-2009-0532. 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, N.W., Washington, D.C. 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) 566-1752. Also, you can send comments to the

Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-OECA-2009-0532 and OMB Control Number 2060-0326 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 Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE)**

	A	B	C	D	E	F	G	H	I
Reporting/Recordkeeping Requirements	Hours/ Occurrence	Occurrences/ Year	Hours/Year (C = A x B)	Respondents/ Year	Technical Hours/Year (C*D*0.85)	Managerial Hours/Year (C*D*0.05)	Clerical Hours/Year (C*D*0.10)	Total Hours/Year (H=E+F+G)	Total Costs/Year <sup>1</sup>
1. Applications	N/A								
2. Survey and Studies	N/A								
3. Reporting Requirements									
A. Read Instructions <sup>b</sup>	1	1	1	0	0	0	0	0	0
B. Required Activities									
i. Tests									
Initial Performance Test-APCD <sup>c</sup>	445	1	445	0	0	0	0	0	0
Conduct Performance Test Method Audits <sup>c</sup>	27	1	27	0	0	0	0	0	0
Repeat Initial Performance Test-APCD <sup>d</sup>	445	1	445	0	0	0	0	0	0
Repeat Performance Test Method Audits <sup>d</sup>	27	1	27	0	0	0	0	0	0
Initial Performance Test-Total Enclosure <sup>e</sup>	215	1	215	1	182.75	10.75	21.50	215.00	20,236.66
Repeat Initial Performance Test-Total Enclosure <sup>d</sup>	215	1	215	0.2	36.55	2.15	4.30	43.00	4,047.33
Performance Test for VOC CEMs <sup>f</sup>	175	1	175	0	0	0	0	0	0
Quarterly VOC CEM Audits <sup>f</sup>	10	4	40	3	102.00	6.00	12.00	120.00	11,294.88
C. Create Information	Included in 3B and 4E								
D. Gather Existing Information	Included in 3B and 4E								
E. Write Report									
Notification of Intent to Construct/Reconstruct <sup>g</sup>	6	1	6	1	5.10	0.30	0.60	6.00	564.74
Notification of Construction Date <sup>g</sup>	2	1	2	1	1.70	0.10	0.20	2.00	188.25
Actual Startup Notification <sup>g</sup>	2	1	2	1	1.70	0.10	0.20	2.00	188.25
Notification of Applicability of the Standard Existing Sources <sup>h</sup>	2	1	2	0	0	0	0	0	0
Notification of Applicability of the Standard New/Reconstructed Sources <sup>g</sup>	2	1	2	1	1.70	0.10	0.20	2.00	188.25
Notification of Initial Performance Test <sup>e</sup>	2	1	2	0	0	0	0	0	0
Report of Initial Test	Included in 3B								
Notification of Compliance Status <sup>h</sup>	4	1	4	0	0	0	0	0	0
Submit Startup, Shutdown, Malfunction Plan <sup>h</sup>	20	1	20	0	0	0	0	0	0
Develop and Implement Quality Control Plan for Continuous Monitoring Systems (CMS) <sup>h</sup>	50	1	50	0	0	0	0	0	0
Report when Exceed HAP Usage Cutoff (or Report Area Source Becoming Major Sources) <sup>f</sup>	2	1	2	0	0	0	0	0	0
Waiver Application <sup>b</sup>	6	1	6	0	0	0	0	0	0
Report of Monitoring Exceedances and Periods of Noncompliance, Including Inconsistencies with Startup, Shutdown, Malfunction Plan <sup>f</sup>	16	4	64	0.6	32.64	1.92	3.84	38.40	3,614.36
Report of No Excess Emissions, Including Startup, Shutdown, Malfunction Reports <sup>f</sup>	4	2	8	5.4	36.72	2.16	4.32	43.20	4,066.16
Reporting Subtotal								472	44,389

**Table 1: Annual Respondent Burden and Cost: NESHAP for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE)  
(Continued)**

5. Recordkeeping Requirements									
A. Read Instructions	Included in 4A								
B. Plan Activities	N/A								
C. Implement Activities	Included in 4D								
D. Develop Record System <sup>h, k</sup>	40	1	40	0	0	0	0	0	0
E. Time to Enter Information									
Facilities above Cutoff, Including Records Associated with Startup, Shutdown, Malfunction, Maintenance of APCD, and Measurement of Freeboard Ratio <sup>l</sup>	0.5	350	175	6	892.50	52.50	105.00	1,050.00	98,830.20
Maintain, Adjust, and Calibrate CMS and Maintain Records of this and Any CMS Malfunction that Occurs <sup>m</sup>	6	52	312	6	1,591.20	93.60	187.20	1,872.00	176,200.13
Facilities below Cutoff <sup>n</sup>	2	1	2	1	1.70	0.10	0.20	2.00	188.25
F. Time to Train Personnel	N/A								
G. Time for Audits	N/A								
<i>Recordkeeping Subtotal</i>								2,924	275,219
<b>TOTAL ANNUAL BURDEN</b>								<b>3,396</b>	<b>319,607</b>

**Assumptions:**

- a) This ICR uses the following labor rates: Managerial \$114.49 (\$54.52 + 110%); Technical \$98.20 (\$46.76 + 110%); and Clerical \$48.53 (\$23.11 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.
- b) This cost was incurred during the first year.
- c) Hours associated with the initial performance test include preparation of a site-specific test plan. Hours for performance test method audits are estimated as 6 percent of the performance test hours. No facility is expected to conduct testing for the air pollution control device (APCD) and CEMs.
- d) Assumes 20 percent of sources will have to be retested (equals zero).
- e) It is projected that, on the average, new coating lines will be added at the rate of one per year. These coating lines will be located at existing facilities which will already be meeting the reporting and recordkeeping requirements of the standard. Also, additional emission points are likely to be tied into the existing APCD. Therefore, new compliance tests for the APCD and continuous monitors will not be necessary. However, a new total enclosure would be built and must be tested.
- f) All facilities using VOC continuous emission monitors (CEMs) will have to perform quarterly audits of monitors, estimated at 3 facilities.
- g) No facilities are expected to conduct an initial performance test.
- h) No facilities are expected to be required to report on status, or develop a startup, shutdown, malfunction plan, quality control plan for continuous monitoring systems (CMS), or record system.
- i) No existing area sources are expected to exceed the HAP usage cutoff or become a major source.
- j) These reports will include data based on CMS performance and/or material balance results. It is assumed that 90 percent of the facilities in this source category will have no excess emission: reporting will therefore be semiannual. Ten percent of the facilities in this source category will have excess emissions; these facilities will need to report quarterly each year. All 6 facilities subject to the control requirements will be submitting reports.
- k) Activities that must be implemented at all facilities include maintaining a 75 percent freeboard ration in wash sinks, the use of a closed system for flushing fixed lines, and the use of a closed system for particulate transfer. A record system will need to be developed to maintain records associated with the freeboard ratio, performance tests, notifications, and CMS QA/QC program.
- l) All facilities subject to the control requirements of the standard will be keeping records.
- m) All but one of the 6 facilities subject to the rule will operate a CMS, as defined in Section 63.2 of the proposed General Provisions. The one facility that will not operate a CMS has only one control device and will perform a materials balance to show compliance.
- n) Facilities that fall below the HAP usage cutoff will have to submit an annual report certifying this usage. One facility is expected to be subject to this requirement.

**Table 2: Average Annual EPA Burden: NESHP for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE)**

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
	EPA Hours/Occurrence	Occurrences/Plant/Year	EPA Hours/Year (C=A*B)	Plants/Year	Technical Hours/Year (C*D*0.85)	Managerial Hours/Year (C*D*0.05)	Clerical Hours/Year (C*D*0.10)	Total Hours/Year (H=E+F+G)	Total Costs/Year <sup>d</sup>
Initial Performance Test <sup>h</sup>	60	0	0	0	0	0	0	0	0
Repeat Initial Performance Test <sup>e</sup>									
1. Retesting Preparation	16	0	0	0	0	0	0	0	0
2. Retesting	60	0	0	0	0	0	0	0	0
<i>Retesting Subtotal</i>								0	0
Report Review									
Notification of Intent to Construct/Reconstruct <sup>d</sup>	2	1	2	1	1.7	0.10	0.20	2.00	89.79
Notification of Construction Date <sup>d</sup>	2	1	2	1	1.7	0.10	0.20	2.00	89.79
Notification of Actual Startup <sup>d</sup>	2	1	2	1	1.7	0.10	0.20	2.00	89.79
Notification of Applicability - Existing Sources <sup>e</sup>	2	0	0	0	0	0	0	0	0
Notification of Applicability - New/Reconstruction Sources <sup>d</sup>	2	1	2	1	1.7	0.10	0.20	2.00	89.79
Notification of Initial Performance Test <sup>f</sup>	2	1	2	1	1.7	0.10	0.20	2.00	89.79
Report of Initial Test <sup>f</sup>	8	1	8	1	6.8	0.40	0.80	8.00	359.14
Notification of Compliance Status <sup>g</sup>	4	0	0	0	0	0	0	0	0
Startup, Shutdown, Malfunction Plan <sup>h</sup>	4	0	0	0	0	0	0	0	0
Quality Control Plan for CMS <sup>h</sup>	4	0	0	0	0	0	0	0	0
Report of Monitoring Exceedances and Periods of Noncompliance <sup>i</sup>	8	1	8	0.60	4.08	0.24	0.48	4.80	215.49
Report of No Excess Emissions <sup>i</sup>	2	2	4	5.40	18.36	1.08	2.16	21.60	969.69
Report for Facilities Below Cutoff <sup>j</sup>	1	1	1	1	0.85	0.05	0.10	1.00	44.89
Report of Area Source Becoming a Major Source or Exceeding HAP Usage Cutoff <sup>k</sup>	8	0	0	0	0	0	0	0	0
Waiver Application <sup>l</sup>	8	0	0	0	0	0	0	0	0
<i>Report Review Subtotal</i>								45	2,038
<b>TOTAL ANNUAL BURDEN</b>								<b>45</b>	<b>2,038</b>

**Assumptions:**

- a) This ICR uses the following labor rates: Managerial \$62.27 (GS-13, Step 5, \$38.92 + 60%); Technical \$46.21 (GS-12, Step 1, \$28.88 + 60%); and Clerical \$25.01 (GS-6, Step 3, \$15.63 + 60%). These rates are from the Office of Personnel Management (OPM), 2010 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. This ICR assumes that Clerical hours are 10 percent of Technical hours and Managerial hours are 5 percent of Technical hours.
- b) Assumes 10 percent of the number of tests conducted are attended by EPA.
- c) Assumes that 20 percent fail the initial performance tests and retest.
- d) Assumes that one new coating line will be added per year. This line will be at an existing facility.
- e) The notification of the applicability of the standard for existing sources has already occurred.
- f) Based on one facility conducting test, including retest.
- g) Assumes no facilities require notification.
- h) Assumes that EPA will review no startup, shutdown, malfunction plans and CMS quality control plans.
- i) The number of noncompliance reports and reports of no excess emissions correspond to the respondents per year reported in Table 1 (column D) multiplied by the number of occurrences per year reported in Table 1 (column B).
- j) One existing facility is expected to be below the solvent usage cutoff.
- k) No existing area sources are expected to exceed the HAP usage cutoff or become area sources.
- l) Assumes all waiver applications have been submitted.