

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR Part 60, Subpart RR) (Renewal)**

**1. Identification of the Information Collection**

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

NSPS for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR Part 60, Subpart RR) (Renewal) EPA ICR Number 0658.10, OMB Control Number 2060-0004

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

The New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR Part 60, Subpart RR), published at 40 CFR part 60, subpart RR, were proposed on December 30, 1980, and promulgated on October 18, 1983. These regulations apply to each coating line used in the manufacture of pressure sensitive tape and label materials, and on which construction or reconstruction commenced after December 30, 1980. This information is being collected to assure compliance with 40 CFR part 60, subpart RR. Facilities that input 45 megagrams of volatile organic compounds (VOC) or less per 12 month period are not subject to the emission limit established by the subpart. This information is being collected to assure compliance with these regulations.

Approximately 36 sources are currently subject to the regulation, and it is estimated that an additional one source per year will become subject to the regulation over the next three years. It is further assumed that there is an average of one affected facility per plant (respondent). These numbers are based on previous experience with the industry and a recent search of the Agency's AFS data base. These figures are based on estimates from the most recently approved Information Collection Request (ICR) renewal. The cost of this ICR will be \$315,341 dollars 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)(l).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires 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 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, volatile organic compound (VOC) emissions from coating lines used in the manufacture of pressure sensitive tape and label materials 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 RR.

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

The control of emissions of VOCs from coating lines used in the manufacture of pressure sensitive tape and label materials requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of VOCs from coating lines used in the manufacture of pressure sensitive tape and label materials are the result of operation of the affected facilities. The subject standards are achieved by the use of reduced (low solvent) VOC coatings; VOC solvent capture and reuse; or capture and destruction of VOC emissions by incineration. 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 or that low solvent coatings are being used 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 standards, and serve as a record of the operating conditions under which compliance was achieved. The performance test may also be observed.

Facilities that are subject to the emission limit need to ensure that the solvent recovery system or thermal incinerator is functioning correctly. Thermal incinerators must be operated at

a high enough temperature to ensure 90 percent control of VOC. 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 NSPS continue to operate the control equipment and achieve compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with the applicable regulations, 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 recordkeeping and reporting requested is required under 40 CFR part 60, subpart RR.

#### **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 32581). 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.

#### **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 consists of emissions data and other information that have been determined not to be private. 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, 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**

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

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

### **4(a) Respondents/NAICS Codes**

The respondents to the recordkeeping and reporting requirements are pressure sensitive tape and label surface coating operations, and on which construction or reconstruction commenced after December 30, 1980. The SIC code for the respondents affected by the standards is SIC (U.S. Standard Industrial Classification) 2672 which corresponds to the North American Industry Classification System (NAICS) code 322222 for coating lines used in the manufacture of pressure sensitive tape and label materials.

### **4(b) Information Requested**

#### **(i) Data Items**

All data in this ICR that is recorded and/or reported is required by NSPS for the Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR part 60, subpart RR.

A source must make the following reports:

<b>Reports for 40 CFR Part 60, Subpart RR</b>	
Notification of Construction/reconstruction	60.7(a)(1)

<b>Reports for 40 CFR Part 60, Subpart RR</b>	
Notification of Actual startup	60.7(a)(3)
Initial performance test results	60.8 (a)
Initial performance test	60.8(d)
Demonstration of continuous monitoring system	60.7(a)(5)
Notification of Physical or operational change	60.7(a)(4)
Excess emissions report	60.7(c), 60.447(b-c)

A source must maintain the following records:

<b>Recordkeeping for 40 CFR Part 60, Subpart RR</b>	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative.	60.7(b)
Maintain calendar month record of all coatings used	60.445(a)
Maintain calendar month record of solvent applied in coating	60.445(b)
Maintain calendar month record of solvent recovered for facility using a solvent recovery device	60.445(c)
Maintain calendar month record of exhaust gas temperature for facility using a thermal incineration solvent destruction device	60.445(f)
Records are required to be retained for two years. The most recent two years of records must be retained at the facility	60.445(h)

### 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 10 percent of the respondents use electronic reporting.

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

<b>Respondent Activities</b>
Read instructions.
Install, calibrate, maintain, and operate CMS for temperature monitoring of the exhaust gases at a thermal incineration solvent destruction device; a CMS for temperature monitoring of the gas upstream and downstream of the catalyst bed at a catalytic incineration solvent destruction device; if applicable, install a monitoring device which continuously indicates that the hood or enclosure that captures fugitive VOC emissions is operating.
Perform initial performance test, Reference Methods 24 and 25 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 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.

<b>Agency Activities</b>
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the AIRS (Aerometric Information Retrieval System) Facility Subsystem (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 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 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 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 two years.

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

A majority of the affected facilities are large entities (e.g., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities.

The number of small entities potentially subject to the requirements of this information collection request is estimated to be 29 percent of the respondent universe or 10 facilities. This estimate is based on the percent of plants in this industry that were classified as small entities during the development of this rule (see BID document EPA-450/3-80-003a, p. 8-30).

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

The specific frequency for each information collection activity within this request is shown below in: Annual Respondent Burden and Cost for NSPS for Pressure Sensitive Tape and Label Coating Operations (40 CFR part 60, subpart RR) (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 3,353 person-hours (Total Labor Hours from Table 1). The recordkeeping hours shown below in Table 1 are 2,755. The reporting requirement hours shown in Table 1 are 598. 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 U. S. 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 labor and continuous emission monitors (CEMs). 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>						
<b>(A) Continuous Monitoring Device</b>	<b>(B) Startup Cost for One Affected Facility</b>	<b>(C) Number of New Affected Facilities to Startup</b>	<b>(D) Total Startup (B X C)</b>	<b>(E) Annual O&amp;M Costs for One Affected Facility</b>	<b>(F) Number of Affected Facilities with O&amp;M</b>	<b>(G) Total O&amp;M (E X F)</b>
Temperature	\$7,000	1	\$7,000	\$1,800	36	\$64,800

The total capital/startup costs for this ICR are \$7,000. This is the total of column D in the above table. The total operation and maintenance (O&M) costs for this ICR are \$64,800. 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 over the next three years of the ICR is estimated to be \$71,800.

**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 \$25,471

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. These rates can be obtained from the OPM web site, <http://www.opm.gov/oca/payrates/index/htm>. Details upon

which this estimate is based appear below in Table 2: Average Annual Agency Burden and Cost for NSPS for Pressure Sensitive Tape and Label Coating Operations (40 CFR part 60, subpart RR).

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

On average over the next three years, approximately 36 existing respondents will be subject to the standard. It is estimated that one additional respondent per year will become subject. The overall average number of respondents is 37 per year.

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

<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=(BxC)+D
Notification of construction/ reconstruction	1	1	0	1
Notification of actual startup	1	1	0	1
Notification of initial performance tests	1	1	0	1
VOC Emission Reports	36	2	0	72
Temperature Reports	29	2	0	58
			Total	133

The number of total annual responses is 133. This is the number in column F of the Respondent Universe and Number of Responses Per Year table. The total annual labor costs are \$315,341. Details upon which this estimate is based appear below in Table 1: Annual Respondent Burden and Cost, New Source Performance Standards for Pressure Sensitive Tape and Label Coating Operations (40 CFR part 60, subpart RR) (Renewal).

The total annual capital and O&M costs to the regulated entity are \$71,800. These costs are detailed in section 6(b)(iii), Capital/Startup vs. Operating and Maintenance (O&M) Costs.

The average annual Agency burden and cost over next three years is estimated to be 300 labor hours at a cost of \$25,471. See below Table 2: Annual Agency Burden and Cost for NSPS for Pressure Sensitive Tape and Label Coating Operations (40 CFR part 60, subpart RR) (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 below in Tables 1 and 2, respectively, and summarized below.

**(i) Respondent Tally**

The total annual labor hours are 3,353. Details regarding these estimates may be found below in Table 1. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 25.21 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$71,800. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

**(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 300 labor hours at a cost of \$25,471. See below Table 2: Annual Agency Burden and Cost for NSPS for Pressure Sensitive Tape and Label Coating Operations (40 CFR part 60, subpart RR) (Renewal).

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

There is no change in the labor hours or cost to the respondents in this ICR compared to the previous ICR because the regulations have not changed over the past three years and are not anticipated to change over the next three years. Since this ICR renewal was approved to be processed under the “Expedited Approach” option, EPA has maintained the same estimate for the number of sources currently subject to this standard as indicated in the most recently approved ICR. Therefore, the labor hours figures in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR.

**6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 25.21 (rounded) hours per response.

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-2009-0410. 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) 566-1752, and the telephone number for the docket center is (202) 566-1927. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0410 and OMB Control Number 2060-0004 in any correspondence.

### **Part B of the Supporting Statement**

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