

**Table 1: Annual Respondent Burden and Cost for NSPS for Pressure Sensitive Tape and Label Coating Operations (40 CFR part 60, subpart RR) (Renewal)**

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									
A. Read Instructions <sup>a</sup>	0.87	1	0.87	1	0.87	0.04	0.09	\$94.05	
B. Required Activities									
Initial performance test	52.17	1	52.17	1	52.17	2.61	5.22	\$5,642.84	
Repeat performance test <sup>b</sup>	52.17	1	52.17	0.2	10.43	0.52	1.04	\$1,128.57	
C. Create Information	-----Included in 3b-----								
D. Gather Existing Information	-----Included in 3e-----								
E. Write Report									
Notification of construction/reconstruction	1.74	1	1.74	1	1.74	0.09	0.17	\$188.09	
Notification of actual startup	1.74	1	1.74	1	1.74	0.09	0.17	\$188.09	
Notification of initial performance test	1.74	1	1.74	1	1.74	0.09	0.17	\$188.09	
Report of performance test	-----Included in 3b-----								
Excess Emission Reports									
VOC Emission Reports <sup>c</sup>	4.35	2	8.70	36	313.04	15.65	31.30	\$33,857.05	
Temperature Reports <sup>d</sup>	3.48	2	6.96	29	201.74	10.09	20.17	\$21,818.99	
	Total Reporting Hours by Labor Category					520	26	52	
<b>TOTAL REPORTING BURDEN</b>						<b>598</b>	<b>Hours</b>	<b>\$56,240</b>	
4. RECORDKEEPING REQUIREMENTS									
A. Read Instructions	-----Included in 3a-----								
B. Plan Activities	-----Included in 4c-----								
C. Implement Activities	-----Included in 3b-----								
Monthly performance test	0.87	12	10.43	36	375.65	18.78	37.57	\$40,628.46	
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 operating parameters <sup>e</sup>	0.22	250	54.35	36	1956.52	97.83	195.65	###	
F. Train Personnel	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
G. Audits	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	Total Recordkeeping Hours by Labor Category					2,396	120	240	
<b>TOTAL RECORDKEEPING BURDEN</b>						<b>2,755</b>	<b>Hours</b>	<b>\$259,100</b>	
	Total Hours by Labor Category					2,916	146	292	

<b>TOTAL ANNUAL BURDEN</b>						<b>3,353</b>	<b>Hours</b>	<b>\$315,341</b>
----------------------------	--	--	--	--	--	--------------	--------------	------------------

Assumptions:

- a. Number of new affected facilities per year: 1
- b. Rate of failed performance tests: 20%
- c. Each source submits one excess emission report every year, in addition to the required semiannual report.
- d. 80% of sources use incineration to control emissions ( $36 \times 8 = 29$ ): 29
- e. Operating 250 days per year as specified in NSPS review document.

**Table 2: Average Annual Agency Burden and Cost for NSPS for Pressure Sensitive Tape and Label Coating Operations (40 CFR part 60, subpart RR) (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= E x 0.1)	Costs per Year
<b>INITIAL PERFORMANCE TESTS</b>								
New Plant <sup>a</sup>	20.87	1	20.87	1	20.87	1.04	2.09	\$1,065.43
<b>REPEAT PERFORMANCE TEST</b>								
New Plant	20.87	1	20.87	0.2	4.17	0.21	0.42	\$213.09
<b>REPORT REVIEW</b>								
New Plant								
Notification of construction	1.74	1	1.74	1	1.74	0.09	0.17	\$88.79
Notification of initial startup	0.43	1	0.43	1	0.43	0.02	0.04	\$22.20
Notification of actual startup	0.43	1	0.43	1	0.43	0.02	0.04	\$22.20
Notification of initial performance test	0.43	1	0.43	1	0.43	0.02	0.04	\$22.20
Review test results	6.96	1	6.96	1	6.96	0.35	0.70	\$355.14
<b>Existing Plant</b>								
VOC emission reports <sup>b</sup>	1.74	2	3.48	36	125.22	6.26	12.52	\$6,392.60
Temperature reports <sup>c</sup>	1.74	2	3.48	29	100.87	5.04	10.09	\$5,149.59
<b>TOTAL ANNUAL HOURS</b>					<b>261</b>	<b>13</b>	<b>26</b>	
<b>SALARY BURDEN (per year)</b>								\$11,490.00
<b>ANNUAL TRAVEL EXPENSES<sup>d, e</sup></b>								
(1 person x 1 plants/year x 3 d/plant x \$100 per diem) + (\$350 round trip/plant x 1 plant/yr) =								\$650.00
<b>TOTAL ANNUAL BURDEN</b>						<b>300</b>	<b>Hours</b>	<b>\$25,471</b>

**Assumptions:**

- a. Number of new plants (per year): 1.
- b. Each source submits one excess emission report every year, in addition to the required semiannual report.
- c. 80% of sources use incineration (36 x .8 = 29): 29.
- d. Percentage of new plants visited: 100%.
- e. Round trip airfare to visit plant: \$350.