

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**1. Identification of the Information Collection**

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

NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal),  
EPA ICR Number 0657.10, OMB Control number 2060-0105

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

The New Source Performance Standards (NSPS) for the Graphic Arts Industry (40 CFR part 60, subpart QQ) were proposed on October 28, 1980, and promulgated on November 8, 1982. These standards apply to the following affected facilities in NSPS subpart QQ: each publication rotogravure printing press (not including proof presses) commencing construction, modification or reconstruction after the date of a proposal. This information is being collected to assure compliance with 40 CFR part 60, subpart QQ.

Approximately 19 facilities are currently subject to the standard, and it is estimated that one additional facility will begin operations and will become subject to the standard over the next three years. It is assumed that 30 percent of those facilities will add or modify a press at their facility during the three-year period.

The current ICR is based on the most recently approved Information Collection Request (ICR). The cost of this ICR will be \$163,005 (rounded). 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 EPA Regional Office.

The active (previous) ICR had the following Terms of Clearance (TOC):

The burden and cost assumptions and calculations for the respondents and the agency should be updated in the next renewal.

EPA has addressed the items of concern in the TOC as instructed by OMB in the active ICR. See sections 6(b) and 6(c) for updated labor figures and attached Tables 1 & 2 for the specific calculations.

**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 publication rotogravure printing presses 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 QQ.

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

The control of emissions of Volatile Organic Compounds (VOCs) from publication rotogravure printing presses requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of VOCs from publication rotogravure printing presses are the result of the operation of the affected facilities. The subject standards are achieved by the capture of VOC emissions using control technology and leak detection and repair procedures.

The recordkeeping and reporting requirements in the standard ensures compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times.

The notifications required in the standard 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 standards are being met. The performance test may also be observed.

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.

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

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

#### **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**

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

#### **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**

None of these reporting or recordkeeping requirements violates any of the regulations

established by OMB at 5 CFR Part 1320, <sup>4</sup> Section 1320.5.

**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 (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 include sensitive questions.

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

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

The respondents to the recordkeeping and reporting requirements are magnetic tape manufacturers. The SIC code for the respondents affected by the standards is SIC (United States Standard Industrial Classification) 2754 which corresponds to the NAICS (The North American Industry Classification System) 323111 for Graphic Arts Industry.

**4(b) Information Requested**

**(i) Data Items**

All data in this ICR that is recorded and/or reported is required by 40 CFR part 60, subpart QQ.

A source must make the following reports:

<b>Notifications and Reports</b>	
Construction/reconstruction	60.7(a)(1)
Actual startup	60.7(a)(3)
Initial performance test results	60.8(a) and 60.433 (e)(6)
Initial performance test	60.8(d)
Physical or operational change	60.7(a)(4)
Semiannual Reports	60.7(c)

A source must keep the following records:

<b>Recordkeeping</b>	
Startups, shutdowns, malfunctions	60.7(b)
Records necessary to determine conditions of the performance test.	60.7(f), 60.8(c), and 60.433(a)(5)
Records showing information to make monthly calculations of emissions.	60.7(f), and 60.434(a)
Records are required to be retained for two years.	60.7(f)

### Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., solvent recovery systems or a solvent vapor capture system to control emissions. 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 are still 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.
Perform initial performance test, Reference Method 24A test, 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.

<b>Respondent Activities</b>
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.

Currently, sources are using automated monitoring equipment that provides parameter data. 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.

## **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, and excess emissions reports, 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, 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.

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 headquarters. EPA and its delegated the data.

7

agencies, EPA regional offices and EPA Authorities can edit, store, retrieve and analyze

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

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

There are no small businesses affected by this standard.

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

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost for NSPS for the Graphic Arts Industry (40 CFR part 60, subpart QQ) (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 1,718 (Total Labor Hours from Table 1). The recordkeeping hours shown in Table 1 are 1,353. The reporting requirement hours shown in Table 1 are 365. 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	\$114.49 (\$54.52 + 110%)
Technical	\$98.20 (\$46.76 + 110%)
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.

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

The only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only types of industry cost associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance costs, because the equipment used by the respondent is the same equipment used in their day-to-day operations to maintain quality control over the surface coating produced for sale.

### **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 \$13,797 (rounded).

This cost is based on the average hourly labor rate as follows:

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 below in Table 2: Average Annual Agency Burden and Cost for NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal).

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

Based on our research for this ICR, approximately 19 existing sources currently are subject to the standard. It is estimated that one additional source per year will become subject to the regulation over the next three years. It is further assumed that and that 30 percent of the existing sources will be reconstructed or modified over 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>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents	(B) Number of Existing Respondents	(C) Number of Existing 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	2.23 <sup>1</sup>	19	0	1.9	19.33
2	2.23 <sup>1</sup>	19	0	1.9	19.33
3	2.23 <sup>1</sup>	19	0	1.9	19.33
Average	2.23 <sup>1</sup>	19	0	1.9	19 (rounded)

<sup>1</sup> One new facility will become subject to the standard and 5.7 facilities per year will be modified or reconstructed over the next three years. The average per year is 2.23.

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 19.33.

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

<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	2.23	1	N/A	2.23
Notification of actual startup	2.23	1	N/A	2.23
Notification of initial performance test	2.23	1	N/A	2.23
Initial performance test report	2.23	1	N/A	2.23
Semiannual reports	19	2	N/A	38
			Total	47 (rounded)

The number of Total Annual Responses is 47.

The total annual labor costs are \$163,005. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost for NSPS for the Graphic Arts Industry (40 CFR part 60, subpart QQ) (Renewal).

Note that the total annual capital and O&M costs to the regulated entity are \$0. 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 detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2 below, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 1,718. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost for NSPS for the Graphic Arts (40 CFR part 60, subpart QQ) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 37 (rounded) hours per response.

There are no annual capital/startup and O&M costs to the regulated entity.

#### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 228 labor hours at a cost of \$13,797. See below Table 2: Average Annual Agency Burden and Cost for NSPS for the Graphic Arts Industry (40 CFR part 60, subpart QQ) (Renewal).

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

EPA has reviewed the burden and calculations and determined that 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. The labor hour figures in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR. However, labor rates were updated for industry and EPA thus causing a change in annual labor costs for the respondents and Agency.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 37 (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-2009-0409. 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, comments can be sent to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0409 and OMB Control Number 2060-0105 in any correspondence.

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

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