

**Table 1: Annual Respondent Burden and Cost for NSPS for Graphic Arts (40 CFR part 60, subpart QQ)**

**Industry**

**(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 <sup>b</sup>	(E) Technical Hours per Year @ \$98.20 (E=C x D)	(F) Management Hours per Year @ \$114.49 (F= E x 0.05)	(G) Clerical Hours per Year @ \$48.53 (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	1	1	1	2.23	2.23	0.112	0.22	\$242.94
B. Required Activities								
New Sources								
Initial performance test	60	1	60	2.23	134	6.70	13.40	\$14,576.18
Repeat of performance test	60	1	60	0.45	27	1.35	2.70	\$2,936.99
C. Create Information				-----Included in 3B-----				
D. Gather Existing Information				-----Included in 3B-----				
E. Write Report								
New Sources								
Notification of construction/reconstruction/modification	2	1	2	2.23	4.5	0.22	0.45	\$485.87
Notification of actual startup	2	1	2	2.23	4.5	0.22	0.45	\$485.87
Notification of initial performance test	2	1	2	2.23	4.5	0.22	0.45	\$485.87
Report of performance test				-----Included in 3B-----				
Semiannual Report	8	2	16	19	304	15.20	30.40	\$33,068.36
	Total Reporting Hours by Labor Category				317	16	32	
<b>TOTAL REPORTING BURDEN</b>					<b>365</b>	<b>Hours</b>		<b>\$52,828</b>
4. RECORDKEEPING REQUIREMENTS								
A. Read Instructions				-----Included in 3A-----				
B. Plan Activities				-----Included in 4C-----				
C. Implement Activities				-----Included in 3B-----				
D. Develop Record System	3	1	3	0.33	1.00	0.05	0.10	\$108.78
E. Time to Enter Information								
Records of startups, shutdowns, malfunctions, etc.	0.20	4.29	0.86	19.33	16.6	0.83	1.66	\$1,804.40
Records of VOC for monthly materials and emissions calculation	1	51.48	51.48	19.33	995.3	49.76	99.53	\$108,264.07
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 Reporting Hours by Labor Category				1,176	59	118	
<b>TOTAL RECORDKEEPING BURDEN</b>					<b>1,353</b>	<b>Hours</b>		<b>\$110,177</b>
<b>TOTAL ANNUAL BURDEN</b>					<b>1,718</b>	<b>Hours</b>		<b>\$163,005</b>

**Assumptions:**

- <sup>a</sup> The labor 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% to account for the benefit packages available to those employed by private industry.
- <sup>b</sup> We have assumed that 30 percent of respondents will modify their operations over the three-year period of this ICR (19x30%=5.7). The one new facility will come on lines over the three-year period. Average over three years is 2.23 [(5.7+1)/3=2.23] per year.
- <sup>c</sup> Assume that 20 percent would have to repeat the performance test due to failure.
- <sup>d</sup> We have assumed that 90 percent of the existing respondents will submit semiannual reports.
- <sup>e</sup> It is assumed that one new facility will become subject to the standard over the next three years. For each year within the three years of the active life of this ICR there will be .33 new respondent.
- <sup>f</sup> We have assumed that there are 19 existing respondents, plus .33 new respondent for a total of 19.33 respondents per year.
- <sup>g</sup> We have assumed that there are 19 existing respondents with an average of four presses per facility (19x4=76), plus six modified presses, and one at a new respondent for a total of 83 presses that are subject to the rule. Therefore, the number of occurrences per respondent per year is 4.29 (83/19.33=4.29).
- <sup>h</sup> We have assumed that the number of occurrences per respondent per year to record VOC is 51.48 (4.29 x 12 months).

**Table 2: Average Annual Agency Burden for NSPS for Graphic Arts Industry (Renewal)**  
**(40 CFR part 60, subpart QQ)**

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 @ \$46.22 (E=C x D)	(F) Management Hours per Year @ \$62.27 (F= E x 0.05)	(G) Clerical Hours per Year @ \$25.01 (G= E x 0.1)
<b>INITIAL PERFORMANCE TESTS</b>							
New Plant	24	1	24	2.23	53.5	2.68	5.35
<b>REPEAT PERFORMANCE TEST</b>							
New Plant	24	1	24	2.23	53.5	2.68	5.35
<b>REPORT REVIEW</b>							
New Plant							
Notification of construction, reconstruction and startup	2	1	2	2.23	4.5	0.22	0.45
Notification of actual startup	0.5	1	0.5	2.23	1.12	0.06	0.11
Notification of initial performance test	0.5	1	0.5	2.23	1.12	0.06	0.11
Review test results	4	1	4	2.23	8.9	0.45	0.89
Semiannual Reports	2	2	4	19	76	3.80	7.60
<b>TOTAL ANNUAL HOURS</b>					<b>199</b>	<b>10</b>	<b>20</b>
<b>SALARY BURDEN (per year)</b>							
<b>ANNUAL TRAVEL EXPENSES</b>							
(1 person x 7 plants/year x 2 d/plant x \$50 per diem) + (\$400 round trip/plant x 7 plant/yr) =							
<b>TOTAL ANNUAL BURDEN</b>						<b>228</b>	<b>Hours</b>

Assumptions:

<sup>a</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 for Managerial (GS-13, Step 5, \$38.92 for Technical (GS-12, Step 1, \$28.88 x 1.6) and \$25.01 Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) "2009 General Schedule" which locality rates of pay.

<sup>b</sup> We have assumed that 30 percent of respondents will modify their operations over the three-year period of this ICR (19x30%=5.7). The one new facility will come on lines over the three-year period is 2.23 [(5.7+1)/3=2.23] per year.

<sup>c</sup> Assume that 20 percent would have to repeat the performance test due to failure.

<sup>d</sup> We have assumed that all 19 respondents will submit semiannual reports.

<sup>e</sup> Assume that it will take one person two days to visit each of the seven plants.

Costs per Year
\$2,774.13
\$2,774.13
\$231.18
\$57.79
\$57.79
\$462.35
\$3,939.35
<b>\$10,296.72</b>
\$3,500.00
<b>\$13,797 (rounded)</b>

x 1.6), \$46.219  
 h excludes

ar period. Average over three