

**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 0658.11, 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) were proposed on December 30, 1980, promulgated on October 18, 1983, and amended on October 17, 2000. These regulations apply to coating lines used in the manufacture of pressure sensitive tape and label materials. Existing facilities and new facilities are both subject to these regulations, except those facilities that input 45 mega grams (MGs) of volatile organic compounds (VOC) or less per 12 month period. New facilities include those that commenced construction, modification or reconstruction after December 30, 1980. This information is being collected to assure compliance with 40 CFR part 60, subpart RR.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also 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 affected facilities subject to NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two 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 U. S. Environmental Protection Agency (EPA) regional office.

Based on our consultations with industry representatives, there is an average of one affected facilities at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 39 respondents per year will be subject to the standards, while one additional respondent per year will become subject to the standards.

The "Affected Public" are coating lines used in the manufacture of pressure sensitive tape and label materials. The burden to the "Affected Public" may be found below in Table 1:

Annual Respondent Burden and Cost – NSPS for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR Part 60, Subpart RR) (Renewal). The burden to the Federal Government burden is attributed entirely to work performed by either Federal employees or government contractors. “Federal government” burden is associated with the review of reports submitted by the respondent, as shown below in Table 2: Average Annual EPA Burden and Cost – NSPS for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR Part 60, Subpart RR) (Renewal).

The Office of Management and Budget (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)(1).

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 four years. In addition, section 114(a) states that the Administrator may require any owner/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 recordkeeping and reporting requirements in the standard ensure 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. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards 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, that low solvent coatings are being used, and the standards is 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 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, duplication does not exist.

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 (77 FR 63813) on October 17, 2012. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standards as it was being developed and the standards have previously been reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Pressure Sensitive Tape Council (PSTC), at (630) 544-5048; and 2) the American Forest and Paper Association, at (202) 463-2436.

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

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

These standards require the respondents 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. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are pressure sensitive tape and label surface coating operations. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2672, which corresponds to the North American Industry Classification System (NAICS) code 322220 for Paper Bag and Coated and Treated Paper Manufacturing.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR Part 60, Subpart RR) (Renewal).

A source must make the following reports:

Notifications	
Notification of construction/reconstruction	60.7(a)(1)
Notification of actual startup	60.7(a)(3)
Notification of physical or operational change	60.7(a)(4)
Notification of continuous monitoring system (CMS) demonstration	60.7(a)(5)
Initial performance test	60.8(d)

Reports	
Initial performance test results	60.8 (a)
Excess emissions report	60.7(c-d), 60.447(b-c)

A source must keep the following records:

Recordkeeping	
Startups, shutdowns, malfunctions, and 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 and 12-month record of solvent applied in coating	60.445(b-d)
Maintain calendar month record of solvent recovered for facility using a solvent recovery device	60.445(c)
Maintain continuous record of exhaust gas temperature for facility using a thermal incineration solvent destruction device	60.445(e)
Maintain continuous record of upstream and downstream gas temperature for facility using a catalytic 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	60.7(f), 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

Respondent Activities
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 Method 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.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently sources are using monitoring and reporting equipment that provide parameter data in an automated way (e.g., continuous parameter monitoring system.) 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.

Agency Activities
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 Online Tracking Information System (OTIS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could 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 OTIS which is operated and maintained by EPA's Office of Compliance. OTIS 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 OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. Both 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/operator for two years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., 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 to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

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 11 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 in below Table 1: Annual Respondent Burden and Cost – NSPS for Pressure Sensitive Tape and Label Surface 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. Wherever 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 3,652 hours (Total Labor Hours from Table 1 below). 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	\$121.44 (\$57.83+ 110%)
Technical	\$100.23 (\$47.73 + 110%)
Clerical	\$50.51 (\$24.05 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2012, “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/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard 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 monitor(s) and other costs such as photocopying and postage.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Temperature	\$7,000	1	\$7,000	\$1,800	39	\$70,200

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 \$70,200. This is the total of column G.

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 \$77,200.

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 \$14,440.

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), 2012 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 EPA Burden and Cost – NSPS for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR Part 60, Subpart RR) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 38 existing respondents will be subject to the standard. It is estimated that an additional one respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 39 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR.

Number of Respondents					
Year	(A) Number of New Respondents ¹	(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	1	37	0	N/A	38
2	1	38	0	N/A	39
3	1	39	0	N/A	40
Average	1	38	0	N/A	39

¹ New respondent include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 39.

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

Total Annual Responses				
(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	N/A	1
VOC Emission Reports	39	2	N/A	78
Temperature Reports	31	2	N/A	62
			Total	141

The number of Total Annual Responses is 141.

The total annual labor costs are \$350,762. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR Part 60, Subpart RR) (Renewal).

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 3,652 hours, at a cost of \$350,762. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR Part 60, Subpart RR) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 26 hours per response (rounded).

The total annual capital/startup and O&M costs to the regulated entity are \$77,200. 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 320 labor hours at a cost of \$14,440. See below Table 2: Average Annual EPA Burden and Cost – NSPS for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR Part 60, Subpart RR) (Renewal).

6(f) Reasons for Change in Burden

There is an adjustment increase in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The adjustment increase in burden from the most recently approved ICR is due to an increase in the number of sources and an increase in labor rates. The increase in the number of sources subject to the standard also results in an increase in the total operation and maintenance (O&M) costs as calculated in section 6(b)(iii) since the previous ICR.

However, there is an adjustment decrease in the total Agency burden costs. The reason for the change in the EPA's burden is related to a mathematical error in the calculations, which led to double counting of Agency costs in the previous ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 26 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 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-2012-0643. 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 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, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2012-0643 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.

Table 1: Annual Respondent Burden and Cost – NSPS for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR Part 60, Subpart RR) (Renewal)

Burden item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person- hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total costs per Year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read instructions ^c	0.87	1	0.87	1	0.87	0.04	0.09	\$96.83
B. Required activities	-							
Initial performance test	52.17	1	52.17	1	52.17	2.61	5.22	\$5,809.72
Repeat performance test ^d	52.17	1	52.17	0.2	10.43	0.52	1.04	\$1,161.94
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	\$193.66
Notification of actual startup	1.74	1	1.74	1	1.74	0.09	0.17	\$193.66
Notification of initial performance test	1.74	1	1.74	1	1.74	0.09	0.17	\$193.66
Report of performance test	-----Included in 3b-----							
Excess emission reports								
VOC emission reports ^e	4.35	2	8.7	39	339.3	16.96	33.93	\$37,763.18
Temperature reports ^f	3.48	2	6.96	31	215.76	10.79	21.58	\$24,013.51
Subtotal for Reporting Requirements						717.31		
4. Recordkeeping Requirements								
A. Read instructions	-----Included in 3a-----							
B. Plan activities	-----Included in 4c-----							
C. Implement activities	-----Included in 3b-----							
Monthly performance test ^g	0.87	12	10.44	39	407.16	20.36	40.72	\$45,315.82
D. Develop record system	N/A							
D. Develop record system	N/A							

Burden item	(A) Person-hours per occurrence ^e	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Total costs per Year ^b
E. Time to enter information								
Records of operating parameters ^h	0.22	250	55	39	2,145	107.25	214.5	\$236,019.89
F. Train personnel	N/A							
G. Audits	N/A							
Subtotal for Recordkeeping Requirements						2,934.99		
TOTAL LABOR BURDEN AND COST (rounded)						3,652		\$350,762

Assumptions:

^a We have assumed that the average number of respondents potentially subject to this rule is 39. There will be one additional new source over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$121.44 per hour for Executive, Administrative, and Managerial labor; \$100.23 per hour for Technical labor, and \$50.51 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2012, 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.

^c We have assumed that it will take 0.87 hours for new respondent to read instructions.

^d We have assumed that 20 percent will have to repeat performance tests because of failure.

^e We have assumed that each source submits one excess emission report every year, in addition to the required semiannual report.

^f We have assumed that 80 percent of sources will use incineration to control emissions (39x.8=31): 31.

^g We assume that each respondent will take 0.87 hours once per month to record performance test.

^h We assume that each respondent will take 0.22 hours 250 time per year to record operating parameters.

Table 2: Average Annual EPA Burden and Cost – NSPS for Pressure Sensitive Tape and Label Surface Coating Operations (40 CFR Part 60, Subpart RR) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per Year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total Cost, \$ ^b
New facility								
Initial performance test	20.87	1	20.87	1	20.87	1.04	2.09	\$1,081.55
Repeat performance test/observed	20.87	1	20.87	0.2	4.17	0.21	0.42	\$216.31
Review reports ^c								
Notification of construction	1.74	1	1.74	1	1.74	0.09	0.17	\$90.13
Notification of initial startup	0.43	1	0.43	1	0.43	0.02	0.04	\$22.53
Notification of actual startup	0.43	1	0.43	1	0.43	0.02	0.04	\$22.53
Notification of initial performance test	0.43	1	0.43	1	0.43	0.02	0.04	\$22.53
Review test results	6.96	1	6.96	1	6.96	0.35	0.70	\$360.52
Existing Plant								
VOC emission reports ^d	1.74	2	3.48	39	135.72	6.79	13.57	\$7,033.81
Temperature reports ^{e, f}	1.74	2	3.48	31	107.88	5.39	10.78	\$5,590.62
TOTAL ANNUAL BURDEN AND COST (rounded)						320		\$14,440

Assumptions:

^a We have assumed that the average number of respondents potentially subject to this rule is 39. There will be one additional new source over the three-year period of this ICR.

^b Labor rates for Federal agency personnel were applied to State/Local agencies, and are based on the average hourly labor rate as follows: Technical \$46.21 (GS-12, Step 1, \$28.88 + 60%); Managerial \$62.27 (GS-13, Step 5, \$38.92 + 60%); and Clerical \$25.01 (GS-6, Step 3, \$15.63 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the OPM, 2012 General Schedule, which excludes locality rates of pay. The rates have been applied to local agencies and have been increased by 60 percent to account for the benefit packages available to government employees.

^c We assume that each of the new facility will have to review reports

^d We assume that each source submits one excess emission report every year, in addition to the required semiannual report.

^e We assume that 80 percent of sources use incineration (39 x .8 = 31): 31.

^f We assume that temperature reports are conducted two times per year.