

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal), EPA ICR Number 1157.10, OMB Control Number 2060-0073.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Flexible Vinyl and Urethane Coating and Printing (CFR part 60, subpart FFF) were: 1) proposed on January 18, 1983; 2) promulgated on June 29, 1984; and 3) amended on October 17, 2000. These regulations apply to facilities with rotogravure printing lines used to print or coat flexible vinyl or urethane products for which construction, modification or reconstruction commenced after January 18, 1983. This information is being collected to assure compliance with 40 CFR part 60, subpart FFF.

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.

Over the next three years, an average of 24 respondents per year will be subject to the standard, and it is estimated that one additional source will become subject over the next three years of this ICR.

The Office of Management and Budget (OMB) approved the currently active ICR without any "Terms of Clearance."

The "Affected Public" are owners or operators of flexible vinyl and urethane coating and printing facilities. The burden to the "Affected Public" may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40

CFR Part 60, Subpart FFF) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors, and may be found below in Table 2: Average Annual EPA Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal).

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 compounds (VOC) emissions from the printing and coating of flexible vinyl and urethane products either cause or contribute to air pollution that may reasonably be anticipated to endanger both public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart FFF.

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.

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 standard 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 FFF.

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

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is OTIS, which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. Based on data from OTIS, we estimate that 24 sources are currently subject to this standards.

Consultations with industry representatives (i.e., respondents) were conducted to determine if there is any way for EPA to reduce the recordkeeping and reporting burden or improve the language in the standard to make it easier to comply. In developing this ICR, the EPA contacted: 1) the Chemical Fabrics and Film Association (CFFA), at (216) 241-7333; and 2) the Wallcoverings Association, at (312) 321-5166. EPA did not receive any comments from the 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.

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 the five years. In addition, EPA would be prevented from pursuing the violators due to either 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 (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 include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are facilities with rotogravure printing lines used to print or coat flexible vinyl or urethane products, and for which construction, modification or reconstruction commenced after January 18, 1983. The United States Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standard are provided in the following table.

| Standard (40 CFR Part 60, Subpart FFF) | SIC Codes | NAICS Codes |
|---|------------------|--------------------|
| Fabric Coating Mills | 2295 | 313320 |
| Coated and Laminated Paper Manufacturing | 2679 | 322222 |
| All Other Converted Paper Product Manufacturing | 2679 | 322299 |

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF).

A source must make the following notifications/reports:

| Notifications/Reports | |
|---|------------|
| Notification of construction/reconstruction | 60.7(a)(1) |
| | |

| Notifications/Reports | |
|---|--------------------------------|
| Notification of physical or operational change | 60.7(a)(4) |
| Notification of initial performance test | 60.8(d), 60.7(a)(6),60.7(a)(7) |
| Notification of delay and reschedule of initial performance test | 60.8(d) |
| Notification of demonstration of continuous monitoring system performance | 60.7(a)(5) |
| Semiannual reports | 60.7(c), 60.7(d), 60.585(b) |

A source must keep the following records:

| Recordkeeping | |
|--|--|
| Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative | 60.7(b), 60.584(d) |
| Records for sources with continuous monitoring systems | 60.7(f)(1), 60.7(f)(2) |
| Records of all measurements | 60.7(f), 60.583(b), 60.583(c) |
| Records of performance test conditions | 60.8(c) |
| Records of operating conditions for control equipment (i.e., temperature or VOC concentration) | 60.584(a)(2),60.584(b)(2), 60.584(c)(2) |

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 20 percent of the respondents use electronic reporting.

(ii) Respondent Activities

| Respondent Activities |
|---|
| Read instructions. |
| Install, calibrate, maintain, and operate CMS for VOC concentration or temperature. |
| Perform initial performance test, Reference Methods 24, 25, 1, 2, 3, and 4 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 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 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 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 to note the operating conditions (VOC concentration or temperature) 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 OTIS 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 these regulations must be retained by the owner/operator for five 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. Based on a small entity impact analysis conducted by EPA during rule development (see background information document: EPA-450/3-81-016a), the number of small entities potentially subject to the requirements of this ICR is estimated to be five percent of the respondent universe, or one facility. 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 specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (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 775 (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 (O&M) 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

| 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 or feed rate monitor | \$20,000 | 0.33 | \$6,600 | \$9,000 | 24 | \$216,000 |

The total capital/startup costs for this ICR are \$6,600. This is the total of column D in the above table.

The total O&M costs for this ICR are \$216,000. 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 \$222,600. These are recordkeeping costs.

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 \$5,435.

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), 2011 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 Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (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 24 existing respondents will be subject to the standards. It is estimated that an additional 0.33 respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 24.33 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 | 0.33 | 23.66 | 0 | 0 | 24 |
| 2 | 0.33 | 24 | 0 | 0 | 24.33 |
| 3 | 0.33 | 24.33 | 0 | 0 | 24.66 |
| Average | | | | | 24.33 |

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 24 (rounded).

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

| Total Annual Responses | | | | |
|------------------------|-----|-----|---------------------------|-------------------------------|
| (A) | (B) | (C) | (D) Number of Existing | (E) Total Annual Responses |
| | | | | |

| Total Annual Responses | | | | |
|---|-----------------------|---------------------|---|-----------|
| Information Collection Activity | Number of Respondents | Number of Responses | Respondents That Keep Records But Do Not Submit Reports | E=(BxC)+D |
| Notification of construction/reconstruction | 0.33 | 1 | 0 | 0.33 |
| Notification of initial performance test | 0.33 | 1 | 0 | 0.33 |
| Semiannual Reports | 24 | 2 | 0 | 48 |
| | | | Total | 48.66 |

The number of Total Annual Responses is 49 (rounded).

The total annual labor costs are \$75,064. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (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 775 hours at a cost of \$75,064. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$222,600. 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 123 labor hours at a cost of \$5,435. See below Table 2: Average Annual EPA Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal).

6(f) Reasons for Change in Burden

There is an overall increase in the total estimated respondent and Agency burden as

currently identified in the OMB Inventory of Approved Burdens. The change in burden from the most recently approved ICR is not due to any program changes. It is primarily due to an increase in the number of sources subject to the standard, which has been adjusted to reflect current information obtained from OTIS. There is also a corresponding increase in the total O&M costs because more sources are now subject to the standard. Additionally, this ICR references updated labor rates from the Bureau of Labor Statistics and the OPM in all burden calculations, which attribute to an increase in costs.

There are additional changes in respondent and Agency burden estimates that are attributed to the correction of mathematical discrepancies identified in the previous ICR. When estimating respondent and Agency technical person-hours per occurrence for each burden item, the previous ICR applied a labor burden adjustment factor of 87 percent to each estimate. Since the previous ICR did not provide supporting rationale to justify the adjustment, and since it is not consistent with the estimation methodology used in other ICRs, we have revised respondent and Agency burden calculations in this ICR to reflect the full, unadjusted labor burden for each estimate.

Additionally, there is an apparent decrease in the total Agency labor cost as a result of a mathematical correction made to the most recently approved ICR. The previous ICR double counted annual salary burdens for Agency employees. To address this discrepancy, we have revised the cost accordingly.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 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-2012-0657. 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-2012-0657 and OMB Control Number 2060-0073 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 Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal)

| Burden Item | A | B | C | D | E | F | G | H |
|--|---------------------------------------|--|--|-----------------------------------|---------------------------------|------------------------------------|----------------------------------|---------------------------------------|
| | Technical person-hours per occurrence | No. of occurrences per respondent per year | Technical person-hours per respondent per year (AxB) | Respondents per year ^a | Technical hours per year (Cx D) | Management hours per year (Ex0.05) | Clerical hours per year (Ex0.10) | Total cost per year (\$) ^b |
| 1. Applications | N/A | | | | | | | |
| 2. Survey and Studies | N/A | | | | | | | |
| 3. Reporting Requirements | | | | | | | | |
| A. Read Instructions ^c | 1 | 1 | 1 | 0.33 | 0.33 | 0.02 | 0.03 | \$37.01 |
| B. Required Activities | | | | | | | | |
| New Sources | | | | | | | | |
| Initial performance test ^d | 280 | 1 | 280 | 0.33 | 92.4 | 4.62 | 9.24 | \$10,289.01 |
| Repeat performance test ^{d,e} | 280 | 0.2 | 56 | 0.07 | 3.92 | 0.2 | 0.39 | \$436.89 |
| C. Create Information | -----Included in 3B----- | | | | | | | |
| D. Gather Existing Information | -----Included in 3B----- | | | | | | | |
| E. Write Report | | | | | | | | |
| New Sources | | | | | | | | |
| Notification of construction/reconstruction ^f | 2 | 1 | 2 | 0.33 | 0.66 | 0.03 | 0.07 | \$73.32 |
| Notification of initial performance test ^{e,g} | 2 | 1.2 | 2.4 | 0.33 | 0.79 | 0.04 | 0.08 | \$88.08 |
| Report of initial performance test | -----Included in 3B----- | | | | | | | |
| Existing Sources | | | | | | | | |
| Semiannual report ^h | 4 | 2 | 8 | 24 | 192 | 9.6 | 19.2 | \$21,379.77 |
| Subtotal for Reporting Requirements | | | | | | 333.62 | | \$32,304.08 |
| 4. Recordkeeping Requirements | | | | | | | | |
| A. Read Instructions | -----Included in 3A----- | | | | | | | |
| B. Plan Activities | -----Included in 3B----- | | | | | | | |
| C. Implement Activities | -----Included in 3B----- | | | | | | | |
| D. Develop Record System | N/A | | | | | | | |
| E. Time to Enter Information | | | | | | | | |
| Records of startup, shutdown, and | 1.5 | 2 | 3 | 24 | 72 | 3.6 | 7.2 | \$8,017.42 |

| Burden Item | A | B | C | D | E | F | G | H |
|---|---------------------------------------|--|--|-----------------------------------|---------------------------------|------------------------------------|----------------------------------|---------------------------------------|
| | Technical person-hours per occurrence | No. of occurrences per respondent per year | Technical person-hours per respondent per year (AxB) | Respondents per year ^a | Technical hours per year (Cx D) | Management hours per year (Ex0.05) | Clerical hours per year (Ex0.10) | Total cost per year (\$) ^b |
| malfunctions ⁱ | | | | | | | | |
| Records of VOC, temperature, and CMS maintenance ^j | 0.25 | 52 | 13 | 24 | 312 | 15.6 | 31.2 | \$34,742.14 |
| F. Audits | N/A | | | | | | | |
| Subtotal for Recordkeeping Requirements | | | | | | 441.6 | | \$42,759.56 |
| TOTAL ANNUAL BURDEN AND COST (rounded) | | | | | | 775 | | \$75,064 |

Assumptions:

- ^a We estimate that an average of 24 existing respondent, and it is estimated that one additional source will become subject over the next three years of this ICR.
- ^b This ICR uses the following labor rates: \$100.23 for technical, \$121.44 for managerial, and \$50.51 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 estimate it will take one hour to read instructions. This burden item applies to new sources only.
- ^d We estimate each performance test will take 280 hours to complete.
- ^e We estimate 20 percent of respondents will need to repeat the initial performance test.
- ^f We estimate it will take 2 hours to prepare the notification of construction/reconstruction.
- ^g We estimate it will take 2 hours to prepare the notification of initial performance test.
- ^h We estimate it will take 4 hours to compile data for semiannual reports.
- ⁱ We estimate it will take 1.5 hours to record startups, shutdowns, and malfunctions.
- ^j We estimate it will take 0.25 hours to record VOCs, temperatures, and CMS maintenance.

Table 2: Average Annual EPA Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal)

| Burden Item | A | B | C | D | E | F | G | H |
|--|-----------------------------|--|--|-----------------------------------|--|---|---|---------------------------------------|
| | Person hours per occurrence | No. of occurrences per respondent per year | Person-hours per respondent per year (C=AxB) | Respondents per year ^a | Technical person hours per year (Cx D) | Management person-hours per year (Ex0.05) | Clerical person-hours per year (Ex0.10) | Total cost per year (\$) ^b |
| Required Activities | | | | | | | | |
| New Sources | | | | | | | | |
| Initial performance tests ^c | 24 | 1 | 24 | 0.33 | 7.92 | 0.40 | 0.79 | \$410.45 |
| Repeat performance tests ^{c, d} | 24 | 1 | 24 | 0.07 | 1.68 | 0.08 | 0.17 | \$102.67 |
| Report Review | | | | | | | | |
| New Sources | | | | | | | | |
| Notification of construction/reconstruction ^e | 2 | 1 | 2 | 0.33 | 0.66 | 0.03 | 0.07 | \$52.36 |
| Notification of initial startup ^f | 0.5 | 1 | 0.5 | 0.33 | 0.17 | 0.01 | 0.02 | \$27.95 |
| Notification of actual startup ^g | 0.5 | 1 | 0.5 | 0.33 | 0.17 | 0.01 | 0.02 | \$27.95 |
| Notification of initial test ^{d, h} | 0.5 | 1.2 | 0.6 | 0.33 | 0.20 | 0.01 | 0.02 | \$29.57 |
| Review test results ^{d, i} | 0.5 | 1.2 | 0.6 | 0.33 | 0.20 | 0.01 | 0.02 | \$29.57 |
| Existing Sources | | | | | | | | |
| Semiannual reports ^j | 2 | 2 | 4 | 24 | 96 | 4.8 | 9.6 | \$4,754.86 |
| ANNUAL SALARY BURDEN | | | | | | 123 | | \$5,435.38 |
| TOTAL ANNUAL BURDEN AND COST (rounded) | | | | | | 123 | | \$5,435 |

Assumptions:

- ^a We estimate that an average of 24 existing respondent, and it is estimated that one additional source will become subject over the next three years of this ICR
- ^b This ICR uses the following labor rates: \$46.21 for technical, \$62.27 for managerial, and \$25.01 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2011 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.
- ^c We estimate it will take 24 hours to participate with each performance test.

- ^d We estimate 20 percent of respondents will need to repeat the initial performance test.
- ^e We estimate it will take 2 hours to review construction/reconstruction notifications.
- ^f We estimate it will take 0.5 hours to review initial startup notifications.
- ^g We estimate it will take 0.5 hours to review actual startup notifications.
- ^h We estimate it will take 0.5 hours to review initial test notifications.
- ⁱ We estimate it will take 0.5 hours to review test results.
- ^j We estimate it will take 2 hours to review each semiannual report twice annually..