SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE) (Renewal), EPA ICR Number 1678.08, OMB Control Number 2060-0326

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Magnetic Tape Manufacturing Operations were proposed on March 11, 1994, promulgated on December 15, 1994, and amended on April 9, 1999. These regulations apply to new and existing magnetic tape manufacturing operations located at major sources of hazardous air pollutants (HAP). These magnetic tape manufacturing operations include solvent storage tanks, mix preparation equipment, coating operations, waste handling devices, and condenser vents in solvent recovery. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart EE.

In general, all NESHAP 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 NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five 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 6 respondents per year will be subject to these standards, and no additional respondents per year will become subject to the standards.

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

The "Affected Public" involves private sector businesses or other for-profits that manufacture magnetic tape. The burden to the "Affected Public" may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Magnetic Tape Manufacturing

Operations (40 CFR Part 63, Subpart EE) (Renewal). The "burden" to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. 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, HAP emissions from magnetic tape manufacturing operations cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart EE.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which where 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 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, leaks are being detected and repaired, 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 63, subpart EE.

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'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 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 been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Amalgamet Incorporated, at (914) 683-5809, and 2) the Ultra Electronics USSI, at (260) 248-3500.

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 (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 Codes

The respondents to the recordkeeping and reporting requirements are owners and operators of magnetic tape manufacturing operations. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and corresponding North American Industry Classification System (NAICS) codes are listed in the following table.

Standard (40CFR Part 63, Subpart EE)	SIC Codes	NAICS Codes
Magnetic and Optical Recording Media	3695	334613
Die-cut Paper and Paperboard and Cardboard	2675	322226

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE).

A source must make the following reports:

Notifications/Reports	
Notification of intent to construct or reconstruct	63.5(b), 63.9(b), 63.707(a)
Notification and report of construction date	63.9(b)(4), 63.707(a)
Notification of anticipated startup	63.9(b)(4), 63.707(a)
Actual startup notification	63.9(b)(4), 63.707(a)
Notification of applicability of the standard	63.9(b)(2-3), 63.707(a-c)
Develop startup, shutdown, malfunction plan, submit reports	63.6(e)(3), 63.10(d)(5), 63.707(a), 63.707(i)
Develop quality control plan for continuous monitoring systems (CMS)	63.8(d), 63.707(a)
Notification and report of performance tests and results	63.7(b), 63.8(e), 63.9(e), (g), 63.10(d)(2), (e)(2), 63.707(a)
Report of when exceeds HAP usage cutoff or when area source becomes major	63.9(b), 63.9(h), 63.707(j)
Notification and report of compliance status	63.9(h)(2-3), 63.707(a)

Notifications/Reports	
Notification and report for waiver application	63.7(h), 63.707(a)
Semiannual reports of no excess emissions	63.10(e)(3), 63.707(a), (i)
Quarterly reports of monitoring exceedances and excess emissions	63.10(e)(3), 63.707(a), (i)

A source must keep the following records:

Recordkeeping	
Five-year retention of records	63.10(b)(1), 63.706(a), (h)
Records of monitored values, maintenance, startup, shutdown, malfunction	63.10(b)(2), 63.10(c), 63.6(e), 63.706(a)
Records of the freeboard ratio	63.10(b)(2), 63.706(b)
Records of CMS maintenance, calibration	63.8(c), 63.8(d)(3), 63.10(c), 63.10(b)(2), 63.706(a)
Records of performance tests	63.10(b)(2), 63.705, 63. 706(a)
Records of material balance calculation	63.10(b)(2), 63.706(a), (d)
Records of HAP usage	63.10(b)(2), 63.706(e)

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.

Respondent Activities
Install, calibrate, maintain, and operate CEM for volatile organic compound (VOC) inlet/outlet concentration to measure efficiency of control device, and thermocouples to measure minimum combustion temperature and temperature across catalyst bed for site-specific operating parameters. Maintain records of coating mix HAP concentration and measure freeboard ratio.
Perform initial performance test, EPA Method 24 for VOC content in coatings, EPA Method 18 or EPA Method 25A to determine HAP or VOC concentrations of air exhaust streams, EPA Method 22 to determine visible emissions, 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
Review notifications and reports, including performance test reports, and excess emissions

Agency Activities
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. 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. 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 five years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, in development of the Final Rule (59 FR 64596), EPA estimates that three of the 14 regulated facilities (i.e. 21 percent) were small entities (i.e., small businesses). Due to the significant impacts expected to be experienced by one of the small facilities, a regulatory flexibility analysis was conducted to assess the feasibility of providing additional flexibility to small businesses complying with the regulation.

This ICR estimates that 16 percent of the current estimated number of affected facilities, or approximately one facility (from a total of six facilities), may be a small entity.

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 – NESHAP for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE) (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 3,905 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 NESHAP 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 monitors 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[1]	(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)
Total enclosure	$11,000	1	$11,000	0	0	0
VOC CEM	0	0	0	$8,000	3	$24,000
Thermo-couples	0	0	0	$2,000	6	$12,000
Totals			**$11,000**			**$36,000**

[1]This ICR assumes six sources are currently subject to the NESHAP, and that no additional source will become subject in the next three years. However, we estimate that one of the six existing sources will incur capital costs due to modification or reconstruction.

The total capital/startup costs for this ICR are $11,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $36,000. 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 $47,000. These are the costs of recordkeeping.

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 $2,353.

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 – NESHAP for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE) (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 six existing respondents will be subject to the standard. It is estimated that an additional no respondents per year will become subject. The overall average number of respondents, as shown in the table below, is six 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	6	0	1	6
2	1	6	0	1	6
3	1	6	0	1	6
Average	1	6	0	1	6

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

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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 6.

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
Report of Monitoring Exceedances and Periods of Noncompliance/ Reports of No Excess Emissions	6	2.2	0	13.2
Notification of Intent to Construct/Reconstruct	1	1	0	1
Notification of Construction Date	1	1	0	1
Actual Startup Notification	1	1	0	1
Notification of Applicability of the Standard New/Reconstructed Sources	1	1	0	1
Total				17.2

The number of Total Annual Responses is 17 (rounded). Note that one of the respondents has been double counted in the above table because they have both existing and new affected facilities.

The total annual labor costs are $378,110. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE) (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, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 3,905 at a cost of $378,110. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 230 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $47,000. 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 52 labor hours at a cost of $2,353. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE) (Renewal).

6(f) Reasons for Change in Burden

The increase in burden from the most recently approved ICR is due to an adjustment in labor rates and updated assumptions used to estimate technical hours per year. This ICR uses updated labor rates from the Bureau of Labor Statistics to calculate burden costs.

In addition to updated labor rates, there is an update to the assumptions used to estimate technical hours per year for the calculated burden costs. In the previous ICR, it was assumed that the per respondent burden hour for each activity accounts for technical, managerial, and clerical hours. In order to have consistency in the burden calculations in the ICR renewal process, this ICR assumes the per respondent burden hour accounts for technical hours only. This results in a slight increase in burden hours and costs for both the respondents and the Agency.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 230 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-2012-0665. 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-2012-0665 and OMB Control Number 2060-0326 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 – NESHAP for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE) (Renewal)

Burden Items (a, b)	(A) Hours per Occurrence	(B) Occurrences per Year	(C) Hours per Year (AxB)	(D) Respondents per Year (a)	(E) Technical Person Hours per Year (CxD)	(F) Managerial Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.10)	(H) Total Cost per year $
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read Instructions [b]	1	1	1	0	0	0	0	$0
B. Required Activities								
Tests								
Initial performance test - APCD [c]	445	1	445	0	0	0	0	$0
Conduct performance test method audits [c]	27	1	27	0	0	0	0	$0
Repeat initial performance test - APCD [d]	445	1	445	0	0	0	0	$0
Repeat performance test method audits [d]	27	1	27	0	0	0	0	$0
Initial performance pest - total enclosure [d]	215	1	215	1	215	10.75	21.5	$23,940.90
Repeat initial performance test - total enclosure [d]	215	1	215	0.2	43	2.15	4.3	$4,788.18
Performance test for VOC CEMs [d]	175	1	175	0	0	0	0	$0
Quarterly VOC CEM audits [f]	10	4	40	3	120	6	12	$13,362.36
C. Create Information	See 3B and 4E							
D. Gather Existing Information	See 3B and 4E							
E. Write Reports								
Notification of intent to construct/reconstruct [e]	6	1	6	1	6	0.3	0.6	$668.12
Notification of construction date [e]	2	1	2	1	2	0.1	0.2	$222.71
Actual startup notification [e]	2	1	2	1	2	0.1	0.2	$222.71

Burden Items (a, b)	(A) Hours per Occurrence	(B) Occurrences per Year	(C) Hours per Year (AxB)	(D) Respondents per Year (a)	(E) Technical Person Hours per Year (CxD)	(F) Managerial Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.10)	(H) Total Cost per year $
Notification of applicability of the standard existing sources [b]	2	1	2	0	0	0	0	$0
Notification of applicability of the standard new/reconstructed sources [e]	2	1	2	1	2	0.1	0.2	$222.71
Notification of initial performance test [g]	2	1	2	0	0	0	0	$0
Report of initial test	See 3B				0	0	0	$0
Notification of compliance status [h]	4	1	4	0	0	0	0	$0
Submit startup, shutdown, malfunction plan [h]	20	1	20	0	0	0	0	$0
Develop and implement quality control plan for continuous monitoring systems (CMS) [h]	50	1	50	0	0	0	0	$0
Report when exceed HAP usage cutoff (or report area source becoming major sources) [i]	2	1	2	0	0	0	0	$0
Waiver application [b]	6	1	6	0	0	0	0	$0
Report of monitoring exceedances and periods of noncompliance, including inconsistencies with startup, shutdown, and malfunction reports [j]	16	4	64	0.6	38.4	1.92	3.84	$4,275.96
Report of no excess emissions, including startup, shutdown, malfunction reports [j]	4	2	8	5.4	43.2	2.16	4.32	$4,810.45
Subtotal for Reporting Requirements						**542.34**		**$52,514.07**
4. Recordkeeping Requirements								
A. Read Instructions	See 4A							
B. Plan Activities	N/A							
C. Implement Activities	See 4D							
D. Develop Record System [h, k]	40	1	40	0	0	0	0	$0
E. Time to enter information								

Burden Items (a, b)	(A) Hours per Occurrence	(B) Occurrences per Year	(C) Hours per Year (AxB)	(D) Respondents per Year (a)	(E) Technical Person Hours per Year (CxD)	(F) Managerial Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.10)	(H) Total Cost per year $
Facilities above cutoff, including records associated with startup, shutdown, malfunction, maintenance of APCD, and measurement of freeboard ratio [l]	0.5	350	175	6	1,050	52.5	105	$116,920.65
Maintain, adjust, and calibrate CMS and maintain records of this and any CMS malfunction that occurs [m]	6	52	312	6	1,872	93.6	187.2	$208,452.82
Facilities below cutoff [n]	2	1	2	1	2	0.1	0.2	$222.71
F. Time to Train Personnel	N/A							
G. Time for Audits	N/A							
Subtotal for Recordkeeping Requirements					**3,362.6**			**$325,596.17**
Total Labor Burden and Cost (rounded)					**3,905**			**$378,110**

Assumptions:

[a] This ICR uses the following labor rates: $121.44 for Managerial, $100.23 for Technical, and $50.51 for Clerical.
[b] This cost was incurred during the first year.
[c] Hours associated with the initial performance test include preparation of site-specific test plan. Hours for performance test method audits are estimated as 6 percent of the performance test hours. No facility is expected to conduct testing for the air pollution control device (APCD) and CEMS.
[d] We have assumed 20 percent of sources will have to be retested (equals zero).
[e] It is projected that, on average, new coating lines will be added at the rate of one per year. These coating lines will be located at existing facilities which will already be meeting the reporting and recordkeeping requirements of the standard. Also, additional emission points are likely to be tied into the existing APCD. Therefore, new compliance tests for the APCD and continuous monitors will not be necessary. However, as new total enclosure would be built and must be tested.
[f] All facilities using VOC continuous emission monitors (CEMs) will have to perform quarterly audits of monitors, estimated at three facilities.
[g] No facilities are expected to conduct an initial performance test.
[h] No facilities are expected to be required to report on status, or develop a startup, shutdown, malfunction plan, quality control plan for continuous

monitoring system (CMS), or record system.

[i] No existing area sources are expected to exceed the HAP usage cutoff or become a major source.

[j] These reports will include data based on CMS performance and/or material balance results. It is assumed to 90 percent of the facilities in this source category will have no excess emission: reporting will therefore be semiannual. We assume that 10 percent of the facilities in this source category will be submitting reports.

[k] Activities that must be implemented at all facilities include maintaining a 75 percent freeboard ration in wash sinks, the use of a closed system for flushing fixed lines, and the use of a closed system for particulate transfer. A record system will need to be developed to maintain records associated with the freeboard ratio, performance test, notification, and CMS QA/QC program.

[l] All facilities subject to the control requirements of the standard will be keeping records.

[m] All but one of the 6 facilities subject to the rule will operate a CMS, as defined in Section 63.2 of the proposed General Provisions. The one facility that will not operate a CMS has only one control device and will be keeping records.

[n] Facilities that fall below the HAP usage cutoff will have to submit an annual report certifying this usage. One facility is expected to be subject to this requirement.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Magnetic Tape Manufacturing Operations (40 CFR Part 63,

Subpart EE) (Renewal)

Activity	(A) EPA Hours per Occurrence	(B) Occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year (a)	(E) Technical Hours per Year (CxD)	(F) Managerial Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.10)	(H) Cost, $
Initial performance test [b]	60	0	0	0	0	0	0	$0
Repeat initial performance test [c]				2	0	0	0	$0
1. Retesting preparation	16	0	0	0	0	0	0	$0
2. Retesting	60	0	0	0	0	0	0	$0
Report Review								
Notification of construction/reconstruction [e]	2	1	2	1	2	0.1	0.2	$103.65
Notification of construction data [d]	2	1	2	1	2	0.1	0.2	$103.65
Notification of actual startup [d]	2	1	2	1	2	0.1	0.2	$103.65
Notification of applicability -existing sources [e]	2	0	0	0	0	0	0	$0
Notification of applicability - new/ reconstruction sources [d]	2	1	2	1	2	0.1	0.2	$103.65
Notification of initial performance test [f]	2	1	2	1	2	0.1	0.2	$103.65
Report of initial performance test [f]	8	1	8	1	8	0.4	0.8	$414.60
Notification of compliance status [e]	4	0	0	0	0	0	0	$0
Startup, shutdown, malfunction plan [h]	4	0	0	0	0	0	0	$0
Quality control plan for CMS [h]	4	0	0	0	0	0	0	$0
Report of monitoring exceedances and periods of noncompliance [i]	8	1	8	0.6	4.8	0.24	0.48	$248.76
Report of no excess emissions [i]	2	2	4	5.4	21.6	1.08	2.16	$1,119.41
Report for facilities blow cutoff [j]	1	1	1	1	1	0.05	0.1	$51.82
Report of area source becoming a major source or exceeding HAP usage cutoff [k]	8	0	0	0	0	0	0	$0
Waiver application [l]	8	0	0	0	0	0	0	$0
Total Labor Burden and Cost (rounded)					**52**			**$2,353**

Assumptions:

[a] This ICR uses the following labor rated: $62.27 for Managerial, $46.21 for Technical, and $25.01 for Clerical.
[b] We assume that 10 percent of the number of tests conducted is attended by EPA.
[c] We assume that 20 percent will fail the initial performance tests and will have to be retested.
[d] We assume that one new coating line will be added per year. This line will be at an existing facility.
[e] We assume that the notification of the applicability of the standard for existing sources has already occurred.
[f] This is based on one facility conducting test, including retesting.
[g] We assume that no facility will require notification.
[h] We assume that EPA will not review startup, shutdown, malfunction plans and CMS quality control plans.
[i] The number of noncompliance reports and reports of no excess emissions correspond to the respondents per year reported in Table 1 (column D) multiplied by the number of occurrences per year reports in Table 1 (column B).
[j] There will be one existing facility expected to be below the solvent usage cutoff.
[k] We assume that no existing area sources are expected to exceed the HAP usage cutoff or become area sources.
[l] We assume that all waiver applications have been submitted.