

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal),
EPA ICR Number 0657.11, OMB Control Number 2060-0105

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for the Graphic Arts Industry were: 1) proposed on October 28, 1980; 2) promulgated on November 8, 1982; and 3) last-amended on April 9, 2004. These regulations apply to each publication rotogravure printing press (not including proof presses) commencing construction, modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 60, subpart QQ.

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 facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 20 existing respondents per year will be subject to the standard, 0.33 additional respondent per year will become subject to the standard. Also, this ICR assumes 30 percent of existing facilities will either add or modify operations over the 3-year ICR period, yielding an average of 2 facilities per year ($20 \times 0.3/3 = 2$) that will also become subject to initial reporting requirements.

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 graphic arts facilities. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal). The “burden” to the “Federal Government” is attributed entirely to work performed by either Federal employees or government contractors. This burden may be found below in Table 2: Average Annual EPA Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (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 compound (VOC) emissions from publication rotogravure printing presses cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for

this source category at 40 CFR part 60, subpart QQ.

2(b) Practical Utility/Users of the Data

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

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

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, 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 (78 FR 33409) on June 4, 2013. 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 the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data.

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 Printing Industries of America, at (202) 730-7970; and 2) the Printing & Graphics Association Mid Atlantic, at (410) 319-0900.

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.

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 or operators of graphic arts facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standard is SIC 2754 (Commercial Printing, Gravure), which corresponds to the North American Industry Classification System (NAICS) code 323111 for Commercial Printing, except Screen and Books.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ).

A source must make the following reports:

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

A source must keep the following records:

Recordkeeping	
Startups, shutdowns, malfunctions	60.7(b)
Records necessary to determine conditions of the performance test	60.7(f), 60.8(c), and 60.433(a)(5)

Recordkeeping	
Records showing information to make monthly calculations of emissions	60.7(f), and 60.434(a)
Records are required to be retained for two years.	60.7(f)

Electronic Reporting

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.
Perform initial performance test, Reference Method 24A test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.

Respondent Activities
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.

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 two years.

5(c) Small Entity Flexibility

There are no small entities (i.e., small businesses) affected by this regulation.

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 the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. 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 1,802 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	\$123.04 (\$58.59+ 110%)
Technical	\$101.22 (\$48.20 + 110%)
Clerical	\$51.18 (\$24.37 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March

2013, “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 only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are neither capital/startup nor operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in the regulation is labor costs. There are no mandatory capital/startup or operation and maintenance 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 \$8,475.

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), 2013 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 the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 20 existing respondents will be subject to the standard. It is estimated that 0.33 additional respondent per year will become subject. Also, this ICR assumes 30 percent of existing facilities will add or modify operations over the 3-year period of this ICR, yielding an average of 2 facilities per year ($20 \times 0.3/3 = 2$) that also will become subject to initial reporting requirements.

The overall average number of respondents, as shown in the table below, is 20.33 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 ¹	(E) Number of Respondents (E=A+B+C-D)
1	2.33	19.66	0	2	20
2	2.33	20	0	2	20.33
3	2.33	20.33	0	2	20.66
Average	2.33	20	0	2	20.33

¹ Over the 3-year ICR period, we have assumed that 30 percent of existing respondents will modify operations ($20 \times 30\% = 6$) and that 1 new facility will come on-line. The three-year average is 2.33 per year ($(6 + 1)/3 = 2.33$).

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 20.33.

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	2.33	1	0	2.33
Notification of actual startup	2.33	1	0	2.33
Notification of initial performance test	2.33	1	0	2.33
Initial performance test report	2.33	1	0	2.33
Semiannual reports	20	2	0	40
			Total	49 (rounded)

The number of Total Annual Responses is 49 responses.

The total annual labor costs are \$176,264. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (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 1,802 hours at a cost of \$176,264. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 37 hours per response.

There are no annual capital/startup and O&M costs to the regulated entity. 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 188 labor hours at a cost of \$8,475. See below Table 2: Average Annual EPA Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal).

6(f) Reasons for Change in Burden

There is an increase in the total estimated respondent burden as currently identified in the OMB Inventory of Approved Burdens. The change in burden is due to an increase in the number of sources subject to the standard, and is not due to any program changes. The number of sources has been increased to account for industry growth that has occurred since the most-recently ICR was approved.

Also, there is an increase in the respondent cost from the most recently-approved ICR due to the use of updated labor rates. This ICR references labor rates from the Bureau of Labor Statistics to calculate the respondent burden cost.

There is a decrease in the total estimated Agency burden as compared to the most recently approved ICR. This change is due to a revision in the labor burden estimate for repeat performance testing. Due to a discrepancy in the previous ICR, the labor burden for repeat

performance testing included respondents who passed the initial performance test. The revision accounts only for respondents who failed the initial performance test resulted in the reduced labor burden observed in this ICR. Also, note that the ICR also incorporates updated labor rates from OPM.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 37 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-2013-0302. 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), WJC 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-2013-0302 and OMB Control Number 2060-0105 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (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	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year ^a (\$)
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions ^b	1	1	1	2.33	2.33	0.12	0.23	\$262.38
B. Required activities								
New sources								
Initial performance test ^b	60	1	60	2.33	139.8	6.99	13.98	\$15,726.10
Repeat of performance test ^c	60	1	60	0.47	28.2	1.41	2.82	\$3,172.22
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
New sources								
Notification of construction, reconstruction, or modification ^b	2	1	2	2.33	4.66	0.23	0.47	\$524.04
Notification of actual startup ^b	2	1	2	2.33	4.66	0.23	0.47	\$524.04
Notification of initial performance test ^b	2	1	2	2.33	4.66	0.23	0.47	\$524.04
Report of performance test	See 3B							
Semiannual report ^d	8	2	16	20	320	16	32	\$35,996.80
Subtotal for reporting Requirements						579.95		\$56,729.62
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	See 4C							
C. Implement activities	See 3B							
D. Develop record system ^e	3	1	3	0.33	0.99	0.05	0.1	\$111.48

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	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year ^a (\$)
E. Time to enter information								
Records of startups, shutdowns, malfunctions, etc. ^{f, g}	0.2	4.28	0.86	20.33	17.48	0.87	1.75	\$1,965.94
Records of VOC for monthly materials and emissions calculation ^{f, h}	1	51.36	51.36	20.33	1,044.15	52.21	104.42	\$117,457.00
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					1,222.02			\$119,534.42
TOTAL ANNUAL BURDEN AND COST (rounded)					1,802			\$176,264

Assumptions:

- ^a. This ICR uses the following labor rates: \$101.22 for technical, \$123.04 for managerial, and \$51.18 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, "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.
- ^b. Over the 3-year ICR period, we have assumed that 30 percent of existing respondents will modify operations ($20 \times 30\% = 6$) and that 1 new facility will come on-line. The three-year average is 2.33 per year ($(6 + 1)/3 = 2.33$).
- ^c. We have assumed 20 percent of respondents will have to repeat the performance test due to failure ($2.33 \times 20\% = 0.47$).
- ^d. We have assumed all existing respondents will submit semiannual reports.
- ^e. We have assumed one new facility will become subject to the standard over the next three years. Therefore, there will be an average of 0.33 new respondents per year over the active life of this ICR.
- ^f. We have assumed that 20 existing respondents are subject to the standard, plus 0.33 new respondents per year for a total of 20.33 respondents per year.
- ^g. We have assumed there are 20 existing respondents with an average of 4 presses per facility ($20 \times 4 = 80$), plus 6 modified presses, and 1 press at the new respondent facility, for a total of 87 presses that are subject to the rule. The number of occurrences per respondent per year is 4.28 ($87/20.33 = 4.28$).
- ^h. We estimate the number of occurrences per respondent per year to be 51.36 ($4.28 \times 12 = 51.36$).

Table 2: Average Annual EPA Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (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	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year ^a (\$)
Initial performance test								
New plant ^b	24	1	24	2.33	55.92	2.8	5.59	\$2,898.23
Repeat performance test								
New plant ^c	24	1	24	0.47	11.3	0.56	1.13	\$584.38
Report review								
New plant								
Notification of construction, reconstruction, or modification ^b	2	1	2	2.33	4.66	0.23	0.47	\$241.42
Notification of actual startup ^b	0.5	1	0.5	2.33	1.17	0.06	0.12	\$60.80
Notification of initial performance test ^b	0.5	1	0.5	2.33	1.17	0.06	0.12	\$60.80
Report of performance test ^b	4	1	4	2.33	9.32	0.47	0.93	\$483.20
Semiannual report ^d	2	2	4	20	80	4	8	\$4,145.96
TOTAL ANNUAL BURDEN AND COST (rounded)						188		\$8,475

Assumptions:

- ^a. 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), 2013 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.
- ^b. Over the 3-year ICR period, we have assumed that 30 percent of existing respondents will modify operations ($20 \times 30\% = 6$) and that 1 new facility will come on-line. The three-year average is 2.33 per year ($(6 + 1)/3 = 2.33$).
- ^c. We have assumed 20 percent of respondents will have to repeat the performance test due to failure ($2.33 \times 20\% = 0.47$).
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