

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Renewal), EPA ICR Number 1951.06, OMB Control Number 2060-0511.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating were proposed on September 13, 2000 and promulgated on December 4, 2002. These regulations apply to existing facilities and new paper and to other web coating facilities, including web coating lines engaged in the coating of metal webs used in flexible packaging, and web coating lines engaged in the coating of fabric substrates for use in pressure sensitive tape and abrasive materials. 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 JJJJ.

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 United States Environmental Protection Agency (EPA) regional office.

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

All of the paper and other web coating facilities in the United States are owned and operated by the paper and other web coating industry (the "Affected Public"). None of the facilities in the United States are owned by state, local, tribal or the Federal government. They are privately-owned, for-profit businesses. The burden to the "Affected Public" may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Renewal). The burden to the "Federal Government" is attributed entirely to work performed by federal employees or government contractors and can

be found in Table 2: Average Annual EPA Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Renewal).

Over the next three years, approximately 251 respondents per year will be subject to the standard, and 6 additional respondents per year will become subject to the standard. The respondent universe and growth rate are based estimates from the previous ICR renewal, and are verified through consultation with industry and OAQPS.

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

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under Section 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, particulate emissions from paper and other web coating facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP standards were promulgated for this source category at 40 CFR Part 63, Subpart JJJJ.

### **2(b) Practical Utility/Users of the Data**

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

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in 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 are 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. Nonduplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart JJJJ.

#### **3(a) Nonduplication**

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 (79 FR 30117) on May 27, 2014. No comments were received on the burden published in the Federal Register.

#### **3(c) Consultations**

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is Enforcement and Compliance History Online (ECHO), which is operated and maintained by EPA's Office of Compliance. ECHO 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 standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Forest & Paper Association at (202) 463-2581 and the National Paper Trade Association at (312) 321-4092.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

### **3(d) Effects of Less Frequent Collection**

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

### **3(e) General Guidelines**

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

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five year records retention requirement is consistent with the Part 70 permit program and the five year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

### **3(f) Confidentiality**

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

### 3(g) Sensitive Questions

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

## 4. The Respondents and the Information Requested

### 4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are paper and other web coating facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed below:

Standard (40 CFR, Part 63, Subpart JJJJ)	SIC Codes	NAICS Codes
Corrugated and Solid Fiber Box Manufacturing	2653	322211
Folding Paperboard Box Manufacturing	2657	322212
Coated and Laminated Packaging Paper and Plastics Film Manufacturing	2671	322221
Coated and Laminated Paper Manufacturing	2672	322222
Plastics, Foil, and Coated Paper Bag Manufacturing	2673	322223
Uncoated Paper and Multiwall Bag Manufacturing	2674	322224
Surface-Coated Paperboard Manufacturing	2675	322226
All Other Converted Paper Product Manufacturing	2675, 2679	322299
Coated and Laminated Paper Manufacturing	2679	322222
Commercial Gravure Printing	2754	323111
Manifold Business Form Printing	2761	323116
Un-laminated Plastics Film and Sheet (except packaging) Manufacturing	3081	326113
Laminated Plastics Plates, Sheet (except packaging), and Shape Manufacturing	3083	326130
Abrasive Products Manufacturing	3291	327910
Laminated Aluminum Foil Manufacturing for Flexible Packaging Uses	3497	322225

### 4(b) Information Requested

#### (i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ).

A source must make the following reports:

<b>Notifications</b>	
Initial notification	63.9(b), 63.3400(b)
Notification of performance test	63.7, 63.9(e), 63.3400(d)
Notification of compliance status	63.9(h), 63.3400(e)
Notification of performance tests results	63.13(f)

<b>Reports</b>	
Performance test report	63.3400(f)
Startup, shutdown, and malfunctions report	63.10(d)(5), 63.3400(g)
Semiannual compliance report	63.3400(c)

A source must keep the following records:

<b>Recordkeeping</b>	
Records to demonstrate compliance	63.10(b)(2), 63.3410(a)(1)
Records for each CMS	63.3410(a)(2)
Records are required to be retained for five years	63.10(b)(1)

### 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.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Perform initial performance test, Reference Method Reference Methods 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 24, 25, 25A tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

## **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.

<b>Agency Activities</b>
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 Integrated Compliance Information System (ICIS) and ECHO.

### **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 reported by state and local governments in the ICIS Air database which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

#### **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 Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (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 13,800 (Total Labor Hours from Table 1). 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	\$129.93 (\$61.87 + 110%)
Technical	\$103.97 (\$49.51 + 110%)
Clerical	\$51.79 (\$24.66 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2014, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

#### **(ii) Estimating Capital/Startup and Operation and Maintenance Costs**

The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(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)
Parametric monitoring (contractor)	\$10,000	5	\$50,000	\$25	222	\$5,550
Continuous emission monitoring system (CEMS)	\$183,500	1	\$183,500	\$26,700	29	\$774,300
<b>Total cost (rounded)</b>			\$234,000			\$780,000

Note: Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding. We estimate an average of 251 sources during the three-year period of this ICR. We also estimate that 6 new sources per year will become subject to the rule. Of the new sources, one source will be using solvent recovery devices and will use CEMS to monitor emissions.

The total capital/startup costs for this ICR are \$234,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$780,000. 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 \$1,010,000. 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 \$413,000.

This cost is based on the average hourly labor rate as follows:

Managerial \$62.90 (GS-13, Step 5, \$39.31 + 60%)

Technical	\$46.67 (GS-12, Step 1, \$29.17 + 60%)
Clerical	\$25.25 (GS-6, Step 3, \$15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2014 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 Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (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 245 existing respondents will be subject to the standard. It is estimated that an additional 6 respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 251 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(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	6	239	0	0	245
2	6	245	0	0	251
3	6	251	0	0	257
Average	6	245	0	0	251

<sup>1</sup> New respondents include sources with constructed and reconstructed 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 251.

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

<b>Total Annual Responses</b>				
(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 $E=(B \times C)+D$
Initial Notification	6	1	0	6
Notification of performance test	6	1	0	6
Notification of compliance status	6	1	0	6
Performance test reports	6	1	0	6
SSM reports	222	0.2	0	44.4
Semiannual report	251	2	0	502
			<b>Total</b>	<b>570.6</b>

Note: SSM reports are typically submitted with the semiannual reports. However, we assume the 222 sources conducting parametric monitoring will submit an additional report of non-conforming SSM 20% of the time.

The number of Total Annual Responses is 571

The total annual labor costs are 1,380,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (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 13,800. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 24 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$1,010,000. 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 9,080 labor hours at a cost of \$413,000. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

### **6(f) Reasons for Change in Burden**

There is an adjustment increase in the respondent and Agency burden, including the respondent O&M cost. The increase is not due to any program changes. Rather, it is due to an increase in the estimated number of sources subject to the rule. Based on information from previous ICR renewals and past industry analyses conducted by the Agency, we assume a linear growth rate of 6 new sources per year for this sector. The growth in the number of sources subject to this NESHAP results in an increase in the total estimated burden hours and costs.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 24 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-2014-0511. 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) 566-1927. 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-2014-0077 and OMB Control Number 2060-0511 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 Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (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 <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Cost, \$ <sup>b</sup>
1. Reporting requirements								
A. Familiarization with rule requirements	4	1	4	251	1,004	50.2	100.4	\$116,108.08
B. Gather information <sup>c</sup>	4	4	16	6	96	4.8	9.6	\$11,101.97
C. Write reports <sup>c</sup>								
i. Initial notification	2	1	2	6	12	0.6	1.2	\$1,387.75
ii. Notification of performance test	2	1	2	6	12	0.6	1.2	\$1,387.75
iii. Notification of compliance status	2	1	2	6	12	0.6	1.2	\$1,387.75
iv. Performance test reports	2	1	2	6	12	0.6	1.2	\$1,387.75
v. SSM reports <sup>d</sup>	2	0.2	0.4	222	88.8	4.44	8.88	\$10,269.32
vi. Semiannual summary report	4	2	8	251	2008	100.4	200.8	\$232,216.16
<b>Subtotal for Reporting Requirements</b>						<b>3,732</b>		<b>\$375,246.52</b>
2. Recordkeeping requirements								
A. Familiarization with rule requirements <sup>c</sup>	4	1	4	6	24	1.2	2.4	\$2,775.49
B. Plan activities <sup>c</sup>	15	1	15	6	90	4.5	9	\$10,408.10
C. Implement activities for compliance coating use <sup>e</sup>	5	12	60	21	1260	63	126	\$145,713.33
D. Implement activities for control devices and process equipment <sup>c</sup>								
i. Design analysis	12	1	12	6	72	3.6	7.2	\$8,326.48
ii. Performance test oversight	20	1	20	6	120	6	12	\$13,877.46
E. Develop record system								
i. Develop startup, shutdown, malfunction plan <sup>c</sup>	20	1	20	6	120	6	12	\$13,877.46
ii. Develop plan for material used	10	1	10	21	210	10.5	21	\$24,285.56
iii. Control equipment and maintenance plan <sup>c</sup>	10	1	10	6	60	3	6	\$6,938.73

F. Time to enter information								
i. Compliance calculation	2	12	24	21	504	25.2	50.4	\$58,285.33
ii. Control equipment testing	1	1	1	222	222	11.1	22.2	\$25,673.30
G. Time to train personnel								
i. Acquisition and installation <sup>c</sup>	15	1	15	6	90	4.5	9	\$10,408.10
ii. Equipment inspection and monitoring	10	1	10	222	2220	111	222	\$256,733.01
iii. Use of technology and systems <sup>f</sup>	10	1	10	222	2220	111	222	\$256,733.01
H. Store, file and maintain records <sup>g</sup>	0.25	12	3	251	753	37.65	75.3	\$87,081.06
I. Retrieve records/reports <sup>g</sup>	0.25	12	3	251	753	37.65	75.3	\$87,081.06
<b>Subtotal for Recordkeeping Requirements</b>						<b>10,025.7</b>		<b>\$1,008,197.47</b>
<b>TOTAL LABOR BURDEN AND COST (rounded):</b>						<b>13,800</b>		<b>\$1,380,000</b>
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)):</b>								<b>\$1,010,000</b>
<b>TOTAL COST:</b>								<b>\$2,390,000</b>

**Note:** Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 251. There will be eighteen additional new sources that will become subject to the rule over the three-year period of the ICR (i.e., six per year).
- <sup>b</sup> This ICR uses the following labor rates: \$129.93 per hour for Executive, Administrative, and Managerial labor; \$103.97 per hour for Technical labor, and \$51.79 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2014, "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.
- <sup>c</sup> We have assumed that this is a one-time activity for each new facility.
- <sup>d</sup> Startup, shutdown, malfunction (SSM) reports are to be submitted twice a year with the required semiannual report. However, as estimated 20 percent of the respondents using parametric monitoring will submit an additional report for a non-conforming SSM.
- <sup>e</sup> We have assumed that it would take 21 respondents to record activities for compliance coating use.
- <sup>f</sup> We have assumed that 222 respondents for this activity.
- <sup>g</sup> We have assumed that 251 respondents will be involved in the storage, filing, maintenance and retrieval of records and reports twelve times per year.



**Table 2: Average Annual EPA Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Renewal)**

Burden item	(A) Person hours per occurrenc e	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
1. Review initial notification <sup>c</sup>	8	1	8	6	48	2.4	4.8	\$2,512.32
2. Review notification of compliance status	10	1	10	6	60	3	6	\$3,140.40
3. Review SSM reports <sup>d</sup>	4	0.2	0.8	222	177.6	8.88	17.76	\$9,295.58
4. Review semiannual summary reports <sup>e</sup>	15	2	30	251	7530	376.5	753	\$394,120.20
5. Review notification of performance test <sup>c</sup>	4	1	4	6	24	1.2	2.4	\$1,256.16
6. Review test results <sup>c,f</sup>	10	1	10	6	60	3	6	\$3,140.40
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>					<b>9,080</b>			<b>\$413,000</b>

**Note:** Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 251. There will be eighteen additional new sources that will become subject to the rule over the three-year period of the ICR (i.e., six per year).

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.90 for Managerial (GS-13, Step 5), \$46.67 for Technical (GS-12, Step 1), and \$25.25 Clerical (GS-6, Step 3). These rates are from the Office of Personnel Management (OPM) “2014 General Schedule” which excludes locality rates of pay.

<sup>c</sup> We have assumed that this is a one-time activity for each new facility.

<sup>d</sup> Startup, shutdown, malfunction (SSM) reports are to be submitted twice a year with the required semiannual report. However, as estimated 20 percent of the respondents using parametric monitoring will submit an additional report for a non-conforming SSM.

<sup>e</sup> It is assumed that each respondents will review summary reports twice per year.

<sup>f</sup> We have assumed that it will take each respondents ten hours to review test results.

