

**Table 1: Annual Respondent Burden and Cost – NESHAP for Paper and Other Web Coatin**

Burden item	(A)	(B)
	Person hours per occurrence	No. of occurrences per respondent per year
<b>1. Reporting requirements</b>		
A. Familiarization with regulatory requirements	4	1
B. Gather information <sup>c</sup>	4	4
C. Write reports <sup>c</sup>		
i. Initial notification	2	1
ii. Notification of performance test	2	1
iii. Notification of compliance status	2	1
iv. Performance test reports	2	1
v. SSM reports <sup>d</sup>	2	0.2
vi. Semiannual summary report	4	2
<b>Subtotal for Reporting Requirements</b>		
<b>2. Recordkeeping requirements</b>		
A. Read instructions <sup>c</sup>	4	1
B. Plan activities <sup>c</sup>	15	1
C. Implement activities for compliance coating use <sup>e</sup>	5	12
D. Implement activities for control devices and process equipment <sup>c</sup>		
i. Design analysis	12	1
ii. Performance test oversight	20	1
E. Develop record system		
i. Develop startup, shutdown, malfunction plan <sup>c</sup>	20	1
ii. Develop plan for material used	10	1
iii. Control equipment and maintenance plan <sup>c</sup>	10	1
F. Time to enter information		
i. Compliance calculation	2	12
ii. Control equipment testing	1	1
G. Time to train personnel		
i. Acquisition and installation <sup>c</sup>	15	1
ii. Equipment inspection and monitoring	10	1
iii. Use of technology and systems <sup>f</sup>	10	1
H. Store, file and maintain records <sup>g</sup>	0.25	12
I. Retrieve records/reports <sup>g</sup>	0.25	12
<b>Subtotal for Recordkeeping Requirements</b>		
<b>TOTAL LABOR BURDEN AND COST (rounded):</b>		
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)):</b>		
<b>TOTAL COST:</b>		

**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

<sup>b</sup> This ICR uses the following labor rates: \$129.93 per hour for Executive, Administrative, and Managerial labor; \$1 of Labor, Bureau of Labor Statistics, June 2014, “Table 2: Civilian Workers, by occupational and industry group.” T 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
- <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

ig (40 CFR Part 63, Subpart JJJJ) (Renewal)

(C)	(D)	103.97 (E)	129.93 (F)	51.79 (G)	(H)
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>
4	251	1004	50.2	100.4	\$116,108.08
16	6	96	4.8	9.6	\$11,101.97
2	6	12	0.6	1.2	\$1,387.75
2	6	12	0.6	1.2	\$1,387.75
2	6	12	0.6	1.2	\$1,387.75
2	6	12	0.6	1.2	\$1,387.75
0.4	222	88.8	4.44	8.88	\$10,269.32
8	251	2008	100.4	200.8	\$232,216.16
			<b>3,732</b>		<b>\$375,246.52</b>
4	6	24	1.2	2.4	\$2,775.49
15	6	90	4.5	9	\$10,408.10
60	21	1260	63	126	\$145,713.33
12	6	72	3.6	7.2	\$8,326.48
20	6	120	6	12	\$13,877.46
20	6	120	6	12	\$13,877.46
10	21	210	10.5	21	\$24,285.56
10	6	60	3	6	\$6,938.73
24	21	504	25.2	50.4	\$58,285.33
1	222	222	11.1	22.2	\$25,673.30
15	6	90	4.5	9	\$10,408.10
10	222	2220	111	222	\$256,733.01
10	222	2220	111	222	\$256,733.01
3	251	753	37.65	75.3	\$87,081.06
3	251	753	37.65	75.3	\$87,081.06
			<b>10,026</b>		<b>\$1,008,197.47</b>
			<b>13,800</b>		<b>\$1,380,000</b>
					<b>\$1,010,000</b>
					<b>\$2,390,000</b>

eighteen additional new sources that will become subject to the rule over the three-year period of the ICR (i.e., six per year). 03.97 per hour for Technical labor, and \$51.79 per hour for Clerical labor. These rates are from the United States Department of Labor's Bureau of Economic Analysis. The rates are from column 1: "Total Compensation." The rates have been increased by 110 percent to account for the benefit

. However, as estimated 20 percent of the respondents using parametric monitoring will submit an additional report for a non-c

and reports twelve times per year.

# New Sources	6
# Existing Sources	251
# Existing Sources with Parametric Monitoring	222

conforming SSM.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Paper and Other We**

<b>Burden item</b>	<b>(A) Person hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>	<b>(C) Person hours per respondent per year (C=AxB)</b>
1. Review initial notification <sup>c</sup>	8	1	8
2. Review notification of compliance status	10	1	10
3. Review SSM reports <sup>d</sup>	4	0.2	0.8
4. Review semiannual summary reports <sup>e</sup>	15	2	30
5. Review notification of performance test <sup>c</sup>	4	1	4
6. Review test results <sup>c, f</sup>	10	1	10
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>			

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 251. The 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 Technical (GS-12, Step 1), and \$25.25 Clerical (GS-6, Step 3). These rates are from the Office of Personnel Management.

<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. Respondents 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.

**b Coating (40 CFR Part 63, Subpart JJJJ) (Renewal)**

	46.67	62.9	25.25	
(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
6	48	2.4	4.8	\$2,512.32
6	60	3	6	\$3,140.40
222	177.6	8.88	17.76	\$9,295.58
251	7530	376.5	753	\$394,120.20
6	24	1.2	2.4	\$1,256.16
6	60	3	6	\$3,140.40
	9,080			\$413,000

re will be eighteen additional new sources that will become subject to the rule over the three-

count for government overhead expenses: \$62.90 for Managerial (GS-13, Step 5), \$46.67 for Management (OPM) "2014 General Schedule" which excludes locality rates of pay.

al report. However, as estimated 20 percent of the respondents using parametric monitoring