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 1678.09, OMB Control Number 2060-0326.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE) were proposed on March 11, 1994, promulgated on December 15, 1994 and amended on both April 9, 1999 and April 7, 2006. 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 notification reports, 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 containing these documents, and retain the file for at least five years following the generation date of such 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.

There are approximately 6 magnetic tape manufacturing operations (the “Affected Public”), which are owned and operated by private industry. None of these 6 facilities in the United States are owned by either state, local, tribal or the Federal government. They are all operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries. 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).

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).

Over the next three years, approximately 6 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

The active (previous) ICR had the following Terms of Clearance (TOC):

> When this ICR is renewed, EPA should review the respondent burden, universe, labor rates, and capital costs and ensure these estimates have been updated.

EPA has addressed each item of concern in the TOC by consulting with the Agency's internal experts as well as industry trade organizations. The Agency's internal experts indicated that the respondent universe may be less than the 6 estimated in this ICR. However, there has not been any recent efforts to count the number of magnetic tape manufacturing operations in the U.S.; therefore, in consistency with the previous ICR, EPA conservatively assumes that there are still 6 respondents.

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 either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/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 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 standards. Continuous emission monitors are used to ensure compliance with these standards 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 these standards 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 that these standards are being met. The performance test may also be observed.

The required quarterly and 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 (80 FR 32116) on June 5, 2015. 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 these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. 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 these standard as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) Amalgamet Inc, 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 these 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 these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

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

Standard (40 CFR Part 63, Subpart EE)	SIC Codes	NAICS Codes
Blank Magnetic and Optical Recording Media Manufacturing	3695	334613
Paper Bag and Coated and Treated Paper Manufacturing	2675	322220

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)

Notifications/Reports	
Actual startup notification	63.9(b)(4)(v), 63.707(a)
Notification of applicability of the standard	63.9(b)(2), 63.707(a-c)
Develop startup, shutdown, malfunction plan, submit reports	63.6(e)(3), 63.10(d)(5), 63.707(a),
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 HAP usage exceeds cutoff or when area source becomes major source	63.9(b), 63.9(h), 63.707(j)
Notification and report of compliance status	63.9(h), 63.707(a)
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.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
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.

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 reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

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 standards (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. 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. 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 17 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 below in 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. 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 record-keeping and reporting requirements is estimated to be 3,910 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	$138.43 ($65.92+ 110%)
Technical	$106.45 ($50.69 + 110%)
Clerical	$52.77 ($25.13 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, “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 standards 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	(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[2]			**$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.

[2] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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 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 $3,190.

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

Managerial	$64.16 (GS-13, Step 5, $40.10 + 60%)
Technical	$47.62 (GS-12, Step 1, $29.76 + 60%)
Clerical	$25.76 (GS-6, Step 3, $16.10 + 60%)

These rates are from the Office of Personnel Management (OPM), 2016 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 6 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 6 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 [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 respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 6.

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

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)

Total Annual Responses				
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Report of monitoring exceedances and periods of non-compliance	0.6	4	0	2.4
Report of no excess emissions	5.4	2	0	10.8
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
Notification of initial performance test	1	1	0	1
Total				18

The number of Total Annual Responses is 18 (rounded). Note that one respondent has been double-counted in the above table because they have both existing affected facilities and new affected facilities.

The total annual labor costs are $404,000. 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 below in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 3,910 hours. 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).

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 217 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $47,000. The cost calculations are detailed above 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 69 labor hours at a cost of $3,190. See below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Magnetic Tape Manufacturing Operations (40 CFR Part 63, Subpart EE) (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 burden as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The change in the burden and cost estimates occurred because of a change in assumption. This ICR assumes all sources will have to familiarize themselves with the regulatory requirements each year. In addition, this ICR has an increase of one response to account for the initial performance test notification.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 217 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), 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-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) Hours per Occurrence	(B) Occurrences per Year	(C) Hours per Year (C=AxB)	(D) Respondents per Year [a]	(E) Technical Person Hours per Year (E=CxD)	(F) Managerial Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.10)	(H) Total Cost per Year ($) [b]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with Regulatory Requirements [c]	1	1	1	6	6	0.3	0.6	$711.89
B. Required Activities								
Tests								
Initial performance test - APCD [d]	445	1	445	0	0	0	0	$0
Conduct performance test method audits [d]	27	1	27	0	0	0	0	$0
Repeat initial performance test - APCD [e]	445	1	445	0	0	0	0	$0
Repeat performance test method audits [e]	27	1	27	0	0	0	0	$0
Initial performance pest - total enclosure [e]	215	1	215	1	215	10.75	21.5	$25,509.43
Repeat initial performance test - total enclosure [e]	215	1	215	0.2	43	2.15	4.3	$5,101.89
Performance test for VOC CEMs [e]	175	1	175	0	0	0	0	$0
Quarterly VOC CEM audits [f]	10	4	40	3	120	6	12	$14,237.82
C. Create Information	See 3B&4E							
D. Gather Existing Information	See 3B&4E							
E. Write Reports								

Notification of intent to construct/reconstruct [g]	6	1	6	1	6	0.3	0.6	$711.89
Notification of construction date [g]	2	1	2	1	2	0.1	0.2	$237.30
Actual startup notification [g]	2	1	2	1	2	0.1	0.2	$237.30
Notification of applicability of the standard existing sources [h]	2	1	2	0	0	0	0	$0
Notification of applicability of the standard new/reconstructed sources [g]	2	1	2	1	2	0.1	0.2	$237.30
Notification of initial performance test [i]	2	1	2	1	2	0.1	0.2	$237.30
Report of initial test	See 3B							
Notification of compliance status [j]	4	1	4	0	0	0	0	$0
Submit startup, shutdown, malfunction plan [j]	20	1	20	0	0	0	0	$0
Develop and implement quality control plan for continuous monitoring systems (CMS) [j]	50	1	50	0	0	0	0	$0
Report when exceed HAP usage cutoff (or report area source becoming major sources) [k]	2	1	2	0	0	0	0	$0
Waiver application [h]	6	1	6	0	0	0	0	$0
Report of monitoring exceedances and periods of noncompliance, including inconsistencies with startup, shutdown, and malfunction reports [l]	16	4	64	0.6	38.4	1.92	3.84	$4,556.10
Report of no excess emissions, including startup, shutdown, malfunction reports [l]	4	2	8	5.4	43.2	2.16	4.32	$5,125.62
Subtotal for Reporting Requirements					**552**			**$56,904**
4. Recordkeeping Requirements								
A. Familiarize with Regulatory Requirements [c]	See 3A							
B. Plan Activities	N/A							

C. Implement Activities	See 4D							
D. Develop Record System [j, m]	40	1	40	0	0	0	0	$0
E. Time to enter information								
Facilities above cutoff, including records associated with startup, shutdown, malfunction, maintenance of APCD, and measurement of freeboard ratio [n]	0.5	350	175	6	1050	52.5	105	$124,580.93
Maintain, adjust, and calibrate CMS and maintain records of this and any CMS malfunction that occurs [o]	6	52	312	6	1872	93.6	187.2	$222,109.99
Facilities below cutoff [p]	2	1	2	1	2	0.1	0.2	$237.30
F. Time to Train Personnel	N/A							
G. Time for Audits	N/A							
Subtotal for Recordkeeping Requirements					**3,363**			**$346,928**
Total Labor Burden and Cost (rounded) [q]					**3,910**			**$404,000**
Total Capital and O&M Cost (rounded) [q]								**$47,000**
Grand Total (rounded) [q]								**$451,000**

Assumptions:

[a] We have assumed there are approximately 6 sources currently subject to the standard and no additional sourcecs will become subject to the standard over the three years of this ICR.

[b] This ICR uses the following labor rates: $138.43 per hour for Executive, Administrative, and Managerial labor; $106.45 per hour for Technical labor, and $52.77 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, "Table 2: Civilian Workers, by Occupational and Industry Group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

[c] We assume that all respondents will have to familiarize themselves with regulatory requirements each year.

[d] 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.

[e] We have assumed 20 percent of sources will have to repeat initial performance tests.

[f] All facilities using VOC continuous emission monitors (CEMs) will have to perform quarterly audits of monitors, estimated at three facilities.

[g] 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.

[h] This is a one time activity.

[i] One new total enclosure will be tested per year.

[j] 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.

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

[l] 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.

[m] 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.

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

[o] 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.

[p] 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.

[q] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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 (C=AxB)	(D) Plants per Year [a]	(E) Technical Hours per Year (E=CxD)	(F) Managerial Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.10)	(H) Cost, $ [b]
Initial performance test [c]	60	0	0	0	0	0	0	$0
Repeat initial performance test [d]								
1. Retesting preparation	16	0	0	0	0	0	0	$0
2. Retesting	60	0	0	0	0	0	0	$0
Report Review					0	0	0	$0
Notification of construction/reconstruction [e, f]	2	1	2	1	2	0.1	0.2	$106.81
Notification of construction date [f]	2	1	2	1	2	0.1	0.2	$106.81
Notification of actual startup [f]	2	1	2	1	2	0.1	0.2	$106.81
Notification of applicability -existing sources [e]	2	0	0	0	0	0	0	$0
Notification of applicability - new/ reconstruction sources [f]	2	1	2	1	2	0.1	0.2	$106.81
Notification of initial performance test [g]	2	1	2	1	2	0.1	0.2	$106.81
Report of initial performance test [g]	8	1	8	1	8	0.4	0.8	$427.23
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	8	4	32	0.6	19.2	0.96	1.92	$1,025.36
Report of no excess emissions	2	2	4	5.4	21.6	1.08	2.16	$1,153.53
Report for facilities below cutoff [i]	1	1	1	1	1	0.05	0.1	$53.40

Report of area source becoming a major source or exceeding HAP usage cutoff [j]	8	0	0	0	0	0	0	$0
Waiver application [k]	8	0	0	0	0	0	0	$0
Total Labor Burden and Cost (rounded) [l]					**69**			**$3,190**

Assumptions:

[a] We have assumed there are approximately 6 sources currently subject to the standard and no additional sources will become subject to the standard over the three years of this ICR.

[b] This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: $64.16 for Managerial, $47.62 for Technical and $25.76 for Clerical. These rates are from the Office of Personnel Management (OPM) "2016 General Schedule" which excludes locality rates of pay.

[c] We assume that 10 percent of the tests conducted are attended by EPA.

[d] We assume that 20 percent will fail the initial performance tests and will have to be retested.

[e] This is a one-time activity.

[f] We assume that one new coating line will be added per year. This line will be at an existing facility.

[g] This is based on one facility conducting tests, including retesting.

[h] We assume that EPA will not review startup, shutdown, malfunction plans and CMS quality control plans.

[i] There will be one existing facility expected to be below the solvent usage cutoff.

[j] We assume that no existing area sources are expected to exceed the HAP usage cutoff or become area sources.

[k] We assume that all waiver applications have been submitted.

[l] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.