

Burden Items	(A) Hours per Occurrence	(B) Occurrences per Year	(C) Hours per Year (C=AxB)	(D) Respondents per Year <sup>a</sup>
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
A. Familiarize with Regulatory Requirements <sup>c</sup>	1	1	1	6
B. Required Activities				
<b>Tests</b>				
Initial performance test - APCD <sup>d</sup>	445	1	445	0
Conduct performance test method audits <sup>d</sup>	27	1	27	0
Repeat initial performance test - APCD <sup>e</sup>	445	1	445	0
Repeat performance test method audits <sup>e</sup>	27	1	27	0
Initial performance test - total enclosure <sup>e</sup>	215	1	215	1
Repeat initial performance test - total enclosure <sup>e</sup>	215	1	215	0.2
Performance test for VOC CEMs <sup>e</sup>	175	1	175	0
Quarterly VOC CEM audits <sup>f</sup>	10	4	40	3
C. Create Information	See 3B & 4E			
D. Gather Existing Information	See 3B & 4E			
E. Write Reports				
Notification of intent to construct/reconstruct <sup>g</sup>	6	1	6	1
Notification of construction date <sup>g</sup>	2	1	2	1
Actual startup notification <sup>g</sup>	2	1	2	1
Notification of applicability of the standard existing sources <sup>h</sup>	2	1	2	0
Notification of applicability of the standard new/reconstructed sources <sup>g</sup>	2	1	2	1
Notification of initial performance test <sup>i</sup>	2	1	2	1
Report of initial test	See 3B			
Notification of compliance status <sup>j</sup>	4	1	4	0
Submit startup, shutdown, malfunction plan <sup>j</sup>	20	1	20	0
Develop and implement quality control plan for continuous monitoring systems (CMS) <sup>j</sup>	50	1	50	0
Report when exceed HAP usage cutoff (or report area source becoming major sources) <sup>k</sup>	2	1	2	0
Waiver application <sup>h</sup>	6	1	6	0
Report of monitoring exceedances and periods of noncompliance, including inconsistencies with startup, shutdown, and malfunction reports <sup>l</sup>	16	4	64	0.6

Report of no excess emissions, including startup, shutdown, malfunction reports <sup>1</sup>	4	2	8	5.4
<b>Subtotal for Reporting Requirements</b>				
4. Recordkeeping Requirements				
A. Familiarize with Regulatory Requirements <sup>c</sup>	See 3A			
B. Plan Activities	N/A			
C. Implement Activities	See 4D			
D. Develop Record System <sup>j,m</sup>	40	1	40	0
E. Time to enter information				
Facilities above cutoff, including records associated with startup, shutdown, malfunction, maintenance of APCD, and measurement of freeboard ratio <sup>n</sup>	0.5	350	175	6
Maintain, adjust, and calibrate CMS and maintain records of this and any CMS malfunction that occurs <sup>o</sup>	6	52	312	6
Facilities below cutoff <sup>p</sup>	2	1	2	1
F. Time to Train Personnel	N/A			
G. Time for Audits	N/A			
<b>Subtotal for Recordkeeping Requirements</b>				
<b>Total Labor Burden and Cost (rounded) <sup>q</sup></b>				
<b>Total Capital and O&amp;M Cost (rounded) <sup>q</sup></b>				
<b>Grand Total (rounded) <sup>q</sup></b>				

**Assumptions:**

- <sup>a</sup> We have assumed there are approximately 6 sources currently subject to the standard and no additional sources
- <sup>b</sup> This ICR uses the following labor rates: \$138.43 per hour for Executive, Administrative, and Managerial labor; \$
- <sup>c</sup> We assume that all respondents will have to familiarize themselves with regulatory requirements each year.
- <sup>d</sup> Hours associated with the initial performance test include preparation of site-specific test plan. Hours for perform
- <sup>e</sup> We have assumed 20 percent of sources will have to repeat initial performance tests.
- <sup>f</sup> All facilities using VOC continuous emission monitors (CEMs) will have to perform quarterly audits of monitors,
- <sup>g</sup> It is projected that, on average, new coating lines will be added at the rate of one per year. These coating lines wi
- <sup>h</sup> This is a one time activity.
- <sup>i</sup> One new total enclosure will be tested per year.
- <sup>j</sup> No facilities are expected to be required to report on status, or develop a startup, shutdown, malfunction plan, qua
- <sup>k</sup> No existing area sources are expected to exceed the HAP usage cutoff or become a major source.
- <sup>l</sup> These reports will include data based on CMS performance and/or material balance results. It is assumed to 90 pe
- <sup>m</sup> Activities that must be implemented at all facilities include maintaining a 75 percent freeboard ration in wash sin
- <sup>n</sup> All facilities subject to the control requirements of the standard will be keeping records.
- <sup>o</sup> All but one of the 6 facilities subject to the rule will operate a CMS, as defined in Section 63.2 of the proposed G
- <sup>p</sup> Facilities that fall below the HAP usage cutoff will have to submit an annual report certifying this usage. One fac
- <sup>q</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

106.45

138.43

52.77

(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 (\$) <sup>b</sup>
6	0.3	0.6	\$711.89
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
215	10.75	21.5	\$25,509.43
43	2.15	4.3	\$5,101.89
0	0	0	\$0
120	6	12	\$14,237.82
6	0.3	0.6	\$711.89
2	0.1	0.2	\$237.30
2	0.1	0.2	\$237.30
0	0	0	\$0
2	0.1	0.2	\$237.30
2	0.1	0.2	\$237.30
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
38.4	1.92	3.84	\$4,556.10

43.2	2.16	4.32	\$5,125.62
<b>552</b>			<b>\$56,904</b>
0	0	0	\$0
1050	52.5	105	\$124,580.93
1872	93.6	187.2	\$222,109.99
2	0.1	0.2	\$237.30
<b>3,363</b>			<b>\$346,928</b>
<b>3,910</b>			<b>\$404,000</b>
			<b>\$47,000</b>
			<b>\$451,000</b>

Responses 18  
hours/response 217

will become subject to the standard over the three years of this ICR.

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's Bureau of Economic Analysis (BEA) 2007-2008 Survey of Professional Occupations (SPO).

Performance test method audits are estimated as 6 percent of the performance test hours. No facility is expected to conduct testing of performance test methods.

Costs are estimated at three facilities.

All facilities will be located at existing facilities which will already be meeting the reporting and recordkeeping requirements of the standard.

Facilities will have a control plan for continuous monitoring system (CMS), or record system.

Approximately 10 percent of the facilities in this source category will have no excess emission: reporting will therefore be semiannual. We assume that the use of a closed system for flushing fixed lines, and the use of a closed system for particulate transfer. A record system will be required for all facilities.

General Provisions. The one facility that will not operate a CMS has only one control device and will be keeping records.

This facility is expected to be subject to this requirement.

Department of Labor, Bureau of Labor Statistics, September 2015, "Table 2: Civilian Workers, by Occupational and Industry Group," [https://www.bls.gov/news.release/ocwz1.pdf](#).  
for the air pollution control device (APCD) and CEMS.

1. Also, additional emission points are likely to be tied into the existing APCD. Therefore, new compliance tests for the

need that 10 percent of the facilities in this source category will be submitting reports.

It will need to be developed to maintain records associated with the freeboard ratio, performance test, notification, and CEMS.

up.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110 percent to account for th

APCD and continuous monitors will not be necessary. However, as new total enclosure would be built and must be test

MS QA/QC program.

e benefit packages available to those employed by private industry.

ed.

**Table 2: Average Annual EPA Burden and Cost - NESHAP for Magnetic Tape Manufacturing Operations**

47.62

Activity	(A) EPA Hours per Occurrence	(B) Occurrences per Year	(C) EPA Hours per Year (C=AxB)	(D) Plants per Year <sup>a</sup>	(E) Technical Hours per Year (E=CxD)
Initial performance test <sup>c</sup>	60	0	0	0	0
Repeat initial performance test <sup>d</sup>					
1. Retesting preparation	16	0	0	0	0
2. Retesting	60	0	0	0	0
Report Review					0
Notification of construction/reconstruction <sup>e, f</sup>	2	1	2	1	2
Notification of construction date <sup>f</sup>	2	1	2	1	2
Notification of actual startup <sup>f</sup>	2	1	2	1	2
Notification of applicability -existing sources <sup>e</sup>	2	0	0	0	0
Notification of applicability - new/ reconstruction sources <sup>f</sup>	2	1	2	1	2
Notification of initial performance test <sup>g</sup>	2	1	2	1	2
Report of initial performance test <sup>g</sup>	8	1	8	1	8
Notification of compliance status <sup>e</sup>	4	0	0	0	0
Startup, shutdown, malfunction plan <sup>h</sup>	4	0	0	0	0
Quality control plan for CMS <sup>h</sup>	4	0	0	0	0
Report of monitoring exceedances and periods of noncompliance	8	4	32	0.6	19.2
Report of no excess emissions	2	2	4	5.4	21.6
Report for facilities below cutoff <sup>i</sup>	1	1	1	1	1
Report of area source becoming a major source or exceeding HAP usage cutoff <sup>j</sup>	8	0	0	0	0
Waiver application <sup>k</sup>	8	0	0	0	0
<b>Total Labor Burden and Cost (rounded) <sup>l</sup></b>					

**Assumptions:**

- <sup>a</sup> We have assumed there are approximately 6 sources currently subject to the standard and no additional sources will
- <sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for gover
- <sup>c</sup> We assume that 10 percent of the tests conducted are attended by EPA.
- <sup>d</sup> We assume that 20 percent will fail the initial performance tests and will have to be retested.
- <sup>e</sup> This is a one time activity.
- <sup>f</sup> We assume that one new coating line will be added per year. This line will be at an existing facility.
- <sup>g</sup> This is based on one facility conducting tests, including retesting.
- <sup>h</sup> We assume that EPA will not review startup, shutdown, malfunction plans and CMS quality control plans.
- <sup>i</sup> There will be one existing facility expected to be below the solvent usage cutoff.
- <sup>j</sup> We assume that no existing area sources are expected to exceed the HAP usage cutoff or become area sources.
- <sup>k</sup> We assume that all waiver applications have been submitted.
- <sup>l</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



**(40 CFR Part 63, Subpart EE) (Renewal)**

64.16      25.76

(F) Managerial Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.10)	(H) Cost, \$ <sup>b</sup>
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0.1	0.2	\$106.81
0.1	0.2	\$106.81
0.1	0.2	\$106.81
0	0	\$0
0.1	0.2	\$106.81
0.1	0.2	\$106.81
0.4	0.8	\$427.23
0	0	\$0
0	0	\$0
0	0	\$0
0.96	1.92	\$1,025.36
1.08	2.16	\$1,153.53
0.05	0.1	\$53.40
0	0	\$0
0	0	\$0
<b>69</b>		<b>\$3,190</b>

I become subject to the standard over the three years of this ICR.

ment overhead expenses: \$64.16 for Managerial, \$47.62 for Technical and \$25.76 for Clerical. These rates are from the O

Office of Personnel Management (OPM) “2016 General Schedule” which excludes locality rates of pay.