

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Magnetic Tape Coating Facilities (40 CFR Part 60, Subpart SSS) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Magnetic Tape Coating Facilities (40 CFR Part 60, Subpart SSS) (Renewal),
EPA ICR Number 1135.12, OMB Control Number 2060-0171

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for NSPS for Magnetic Tape Coating Facilities (40 CFR Part 60, Subpart SSS) were proposed on January 22, 1986, promulgated on October 3, 1988, and last amended on February 12, 1999. These regulations apply to each new and existing coating operation and coating mixing equipment at magnetic tape coating facilities for which construction, modification, or reconstruction began after January 22, 1986. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 60, Subpart SSS.

In general, all NSPS 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 NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents, and retain the file for at least two 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.

All of the magnetic tape coating facilities in the United States are owned and operated by the magnetic tape coating industry (aka: the "Affected Public"). None of the facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and 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 – NSPS for Magnetic Tape Coating Facilities (40 CFR Part 60, Subpart SSS) (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 – NSPS for Magnetic Tape Coating Facilities (40 CFR Part 60, Subpart SSS) (Renewal).

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. However, we assume that two existing respondents will each construct a new coating line per year over the next three years.

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 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years.

In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, volatile organic compound (VOC) emissions from magnetic tape coating operations either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated

for this source category at 40 CFR Part 60, Subpart SSS.

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 semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

3. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart SSS.

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 (81 FR 26546) on May 3, 2016. 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 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 association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards 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) the National Electrical Manufacturers Association (NEMA), at mar_kohorst@nema.org; and 2) the Imation Corporation, at (805) 418-2700.

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.

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 magnetic tape coating facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3695, which corresponds to North American Industry Classification System (NAICS) 334613 for blank magnetic and optical recording media manufacturing.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Magnetic Tape Coating Facilities (40 CFR Part 60, Subpart SSS).

A source must make the following reports:

Notifications/Reports	
Notification of construction/reconstruction	60.7(a)(1)
Notification of actual startup	60.7(a)(3)
Initial performance test results	60.717(a), 60.8(a)
Notification of initial performance test	60.8(d)
Notification of demonstration of continuous monitoring system	60.7(a)(5)
Notification of physical or operational change	60.7(a)(4)
Excess emissions report	60.7(c)
Report of no excess emissions	60.7(c)(4)
Reports of when size cutoff is exceeded	60.717(c)

A source must keep the following records:

Recordkeeping	

Recordkeeping	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	60.7(b)
Record of projected/actual solvent use	60.714(a)
Records of monthly liquid material balance	60.714(b)
Records of control device operating parameters	60.714(c)-(h)
Records of periods when no emission control device is used	60.714(i)
Monthly determination of average VOC content	60.714(j)
Records are required to be retained for two years. Records must be kept onsite.	60.714(k)

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 CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Method 24 test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and

Respondent Activities
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 standard and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. 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. The EPA, as well as its delegated Authorities, can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for two

years.

5(c) Small Entity Flexibility

There are no small entities (i.e., small businesses) affected by this regulation and no small businesses are expected to become subject to the regulations over the next three years. The impact on small entities was taken into consideration during the development of the regulation. Any new coating operation that utilizes less than 38 m³ of solvent or any modified or reconstructed coating operation that utilizes less than 370 m³ of solvent for the manufacture of magnetic tape per calendar year is subject only to the monitoring and reporting requirements of 60.714(a), 60.717(b), and 60.717(c).

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 – NSPS for Magnetic Tape Coating Facilities (40 CFR Part 60, Subpart SSS) (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 neither conduct nor 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 2,030 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulations, Agency knowledge and experience with the NSPS program, the previously-approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$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 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(s) 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)
CEM ²	\$29,000	1	\$29,000	\$1,200	4	\$4,800
Thermocouple	\$2,300	2	\$4,600	\$8,000	6	\$48,000
Total ³			\$33,600			\$52,800

¹ We assume there are 6 existing sources, and that two of the existing sources will construct a new coating line per year.

² We assume that 60 percent of sources will install CEM.

³ 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 \$33,600. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$52,800. 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 \$86,400. 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 such activities 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 \$6,440.

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 – NSPS for Magnetic Tape Coating Facilities (40 CFR Part 60, Subpart SSS) (Renewal).

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

Based on our research for this ICR, on average approximately 6 existing respondents will be subject to these standards over the next three years. Also, it is estimated that no additional respondents per year will become subject to these same standards. However, we assume that two existing respondents will each construct a new coating line each year. 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	(E) Number of Respondents (E=A+B+C-D)

Number of Respondents					
				Respondents	
1	2	6	0	2	6
2	2	6	0	2	6
3	2	6	0	2	6
Average	2	6	0	2	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) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/ reconstruction	1	1	0	1
Notification of physical /operational change	2	1	0	2
Notification of actual startup	2	1	0	2
Notification of initial performance test	2	1	0	2
Notification of CMS	2	1	0	2
Quarterly report of excess emission	1.2	4	0	4.8
Semiannual report of no excess emission	4.8	2	0	9.6
			Total	23.4

The number of Total Annual Responses is 23 (rounded).

The total annual labor costs are \$209,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Magnetic Tape Coating Facilities (40 CFR Part 60, Subpart SSS) (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 2,030 hours. Details regarding these estimates may be

found below in Table 1: Annual Respondent Burden and Cost – NSPS for Magnetic Tape Coating Facilities (40 CFR Part 60, Subpart SSS) (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 88 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$86,400. 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 139 labor hours at a cost of \$6,440. See below in Table 2: Average Annual EPA Burden and Cost – NSPS for Magnetic Tape Coating Facilities (40 CFR Part 60, Subpart SSS) (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 labor hours as currently identified in the OMB Inventory of Approved Burdens. Instead, this increase is not due to any program changes. The change in labor hour and cost estimates occurred because of a change in assumption. This ICR assumes all existing sources will have to re-familiarize with the regulatory requirements each year.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 88 hours per response. “Burden” means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and

requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2013-0318. An electronic version of the public docket is available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2013-0318 and OMB Control Number 2060-0171 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NSPS for Magnetic Tape Coating Facilities (40 CFR Part 60, Subpart SSS) (Renewal)

Burden Items	(A) Person hours per occurrence	(B) Number of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Number of Respondents per year ^a	(E) Technical person hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Labor Costs per Year (\$) ^b
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with regulatory requirements ^c	0.87	1	0.87	6	5.22	0.26	0.52	\$619.35
B. Required Activities								
Initial performance test ^d	243.48	1	243.48	2	486.96	24.35	48.70	\$57,777.07
Repeat of performance test ^e	243.48	0.2	48.70	2	97.39	4.87	9.74	\$11,555.41
Method 24 Testing	78.26	12	939.12	0.1	93.91	4.70	9.39	\$11,142.52
C. Create Information	See 3B							
D. Gather Existing Information	See 3E							
E. Write Report								
1) Notification of construction/ reconstruction/modification ^f	1.74	1	1.74	1	1.74	0.09	0.17	\$206.45
2) Notification of physical/ operational change	6.96	1	6.96	2	13.92	0.70	1.39	\$1,651.59
3) Notification of actual startup	1.74	1	1.74	2	3.48	0.17	0.35	\$412.90
4) Notification of initial performance test	1.74	1	1.74	2	3.48	0.17	0.35	\$412.90
5) Notification of CMS	1.74	1	1.74	2	3.48	0.17	0.35	\$412.90
6) Report of performance test	See 3B							
7) Excess Emission Report ^g	13.91	4	55.64	1.2	66.77	3.34	6.68	\$7,921.92
8) Report of No Excess Emission ^h	6.96	2	13.92	4.8	66.82	3.34	6.68	\$7,927.62

9) Report when Exceed Size Cutoff	1.74	1	1.74	0	0	0	0	\$0
Subtotal for Reporting Requirements						970		\$100,041
4. Recordkeeping Requirements								
A. Familiarize with regulatory requirements ^c	See 3A							
B. Plan Activities	See 4C							
C. Implement Activities	See 3B							
D. Develop Record System	N/A							
E. Time to Enter Information								
1) Records of startups, shutdowns, malfunctions, etc. ⁱ	1.3	50	65	6	390	19.5	39	\$46,272.92
2) Records of control device operating parameters ^j	0.22	350	77	6	462	23.1	46.2	\$54,815.61
3) Records of Projected/Actual Solvent Use ^k	6.96	2	13.92	1.2	16.70	0.84	1.67	\$1,981.90
4) Records for Monthly Liquid Material Balance ^l	1.74	12	20.88	1.2	25.06	1.25	2.51	\$2,972.86
5) Monthly Determination of Avg. VOC Content ^m	1.74	12	20.88	1.2	25.06	1.25	2.51	\$2,972.86
6) Records of periods when no emission control device is used	See 4E(2)							
F. Train Personnel	N/A							
G. Audits	N/A							
Subtotal for Recordkeeping Requirements						1,057		\$109,016
TOTAL LABOR BURDEN AND COST (rounded)ⁿ						2,030		\$209,000
TOTAL CAPITAL AND O&M COST (rounded)ⁿ								\$86,400
GRAND TOTAL (rounded)ⁿ								\$295,000

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 6 existing sources, and no additional sources will become subject to the standard. However, we assume that two coating lines per year will be constructed at existing sources over the three-year period 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 have assumed all respondents will have to familiarize with the regulatory requirements each year.
- ^d We have assumed that it will take each respondent 243.48 hours to perform initial performance test.
- ^e We have assumed 20 percent of respondents will have to repeat performance tests.
- ^f We have assumed that there will be one modification/reconstruction line over 5 years.
- ^g We have assumed that 20 percent of sources will report excess emissions.
- ^h We have assumed that 80 percent of sources will report no excess emissions.
- ⁱ We have assumed that each respondent will take 1.3 hours 50 times per year to record SSM reports.
- ^j We have assumed that each respondent will take 0.22 hours 350 time per year to record the control device operating parameters information.
- ^k We have assumed that 20 percent of respondents will enter information on records of projected/actual solvent use two times per year.
- ^l We have assumed that 20 percent of respondents will record liquid material balance 12 times per year.
- ^m We have assumed that 20 percent of respondents will perform monthly VOC determination.
- ⁿ Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NSPS for Magnetic Tape Coating Facilities (40 CFR Part 60, Subpart SSS) (Renewal)

Activity	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=AxB)	(D) Plants per Year ^a	(E) Technical Hours per Year (E=CxD)	(F) Management Hours per Year (F=E \times 0.05)	(G) Clerical Hours per Year (G=E \times 0.1)	(H) Total Costs per Year (\$) ^b
Initial Performance Tests ^c	20.87	1	20.87	2	41.74	2.09	4.17	\$2,229.08
Repeat Performance Test ^d	20.87	0.2	4.17	2	8.35	0.42	0.83	\$445.82
Report Review								
Notification of construction	1.74	1	1.74	1	1.74	0.09	0.17	\$92.92
Notification of actual startup	0.43	1	0.43	2	0.86	0.04	0.09	\$45.93
Notification of initial test ^e	0.43	1.2	0.52	2	1.03	0.05	0.10	\$55.11
Review test results ^f	6.96	1.2	8.35	2	16.70	0.84	1.67	\$892.06
Excess emission report ^g	6.96	4	27.84	1.2	33.41	1.67	3.34	\$1,784.12
Report of no excess emissions ^h	1.74	2	3.48	4.8	16.70	0.84	1.67	\$892.06
TOTAL LABOR BURDEN AND COST (rounded)ⁱ						139		\$6,440

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 6 existing sources, and no additional sources will become subject to the standard. However, we assume that two coating lines per year will be constructed at existing sources over the three-year period of this ICR.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$64.16 Managerial rate (GS-13, Step 5, \$40.10 x 1.6), \$47.62 Technical rate (GS-12, Step 1, \$29.76 x 1.6), and \$25.76 Clerical rate (GS-6, Step 3, \$16.10 x 1.6). These rates are from the Office of Personnel Management (OPM) “2016 General Schedule”, which excludes locality rates of pay.

^c We have assumed that it will take 20.87 hours to review each initial performance test.

^d We have assumed that 20 percent of respondents will have to repeat performance tests.

^e We have assumed that it will take 0.43 hours 1.2 times per year to review each initial test notification.

^f We have assumed that it will take 6.96 hours 1.2 times per year to review test results.

^g We have assumed that 20 percent of sources will report excess emissions.

^h We have assumed that 80 percent of sources will report no excess emissions

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