

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION**

**NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR PRINTING, COATING, AND DYEING
(Amendments)**

ATTACHMENT 1

TABLES 1, 2, 3, and 4

Annual Respondent Burden and Cost of Recordkeeping and Reporting R

Summary of Annual Respondent Burden and Cost of Recordkeeping and

ATTACHMENT 2

TABLES 5, 6, 7, and 8

Annual Agency Burden and Cost of Recordkeeping and Reporting Requi

Summary of Annual Agency Burden and Cost of Recordkeeping and Rej

F
AGENCY

of Fabrics and Other Textiles (40 CFR Part 63, Subpart 6000)

Requirements for the Printing, Coating, and Dyeing of Fabrics and Other Textiles NESHAP – Years 1

Reporting Requirements for the Printing, Coating, and Dyeing of Fabrics and Other Textiles NESHAP

Requirements for the Printing, Coating, and Dyeing of Fabrics and Other Textiles NESHAP - Year 1-3 (A

Reporting Requirements for the Printing, Coating, and Dyeing of Fabrics and Other Textiles NESHAP (

-3 (Amendments)

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Respondent Wages (\$2016)		
Category (1)	Hourly Mean Wage (2)	Loaded Wage (3)
Technical	\$45.14	\$94.79
Clerical	\$18.11	\$38.03
Managerial	\$57.25	\$120.23

Footnotes:

(1) The Wage categories "Technical," "Clerical," and "Managerial" refer to the labor category codes 11-3051, 43-6010, and 11-1021, respectively, in the United States Department of Labor, Bureau of Labor Statistics table titled "May 2016 National Industry-Specific Occupational Employment and Wage Estimates NAICS 313000 - Textile Mills," found here:
https://www.bls.gov/oes/current/naics3_313000.htm

(2) Selected "mean hourly wage" in the table referenced in footnote 1.

(3) Loaded Wage is the 2016 Wage increased by 110 percent to account for the benefit packages available to those employed by private industry.

EPA Wages (\$2016)		
Category (1)	Hourly Mean Wage	Wage With Fringe & Overhead (2)
(GS- 12, step 1) - Technical	\$30.05	\$48.08
(GS- 13, step 5) - Managerial	\$40.50	\$64.80
(GS-6, step 3) - Clerical	\$16.26	\$26.02

Footnotes:

(1) The hourly mean wage for each category is found here:
<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salar>

(2) Wage with fringe and overhead is the hourly mean wage increased by 60 percent to account for the benefit packages available to government employees.

Table 1: Annual Respondent Burden and Cost – NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles

Burden item	(A) Person - hours per occurrence	(B) No. of occurrence per respondent per year
1. Applications	N/A	
2. Survey and Studies	N/A	
3. Reporting Requirements		
A. Familiarization with rule requirement	4	1
B. Required activities		
Initial oxidizer performance test ^{c, e}	280	1
Repeat oxidizer performance test ^{c, e, f}	280	1
Initial capture performance test ^{c, e}	215	1
Repeat capture performance test ^{c, e, f}	215	1
Startup, shutdown, malfunction plan ^c	40	1
Solvent recovery system compliance determination ^{c, p}	4	12
Emission rate limit compliance determination	4	12
Coordination with suppliers ^g	40	1
C. Create information	See 4B	
D. Gather existing information	See 4B	
E. Write report		
Initial notification ^c	2	1
Notification of construction/reconstruction ^c	2	1
Notification of anticipated startup ^c	2	1
Notification of actual startup ^c	2	1
Notification of compliance status ^c	4	1
Notification of performance test ^{c, e}	2	1
Performance test report ^{c, e}	40	1
Report of monitoring exceedances ^{c, h, k}	16	2
Report of no excess emissions ^{c, i, k}	8	2
Startup, shutdown, malfunction report ^{c, j, k}	8	2
Report of compliance deviation ^{d, k, l}	16	2
Report of no compliance deviations ^{d, k, m}	8	2
Subtotal for Reporting Requirements		
4. Recordkeeping Requirements		
A. Familiarization with rule requirement	See 4B	

B. Plan activities	N/A	
C. Implement activities	N/A	
D. Develop record system	N/A	
E. Time to enter information		
Records of all information required by standards ^a	0.25	52
F. Time to train personnel	N/A	
G. Time to adjust existing ways to comply with previously applicable requirements	N/A	
H. Time to transmit or disclose information ^o	0.25	2
I. Time for audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST ^q		
Capital and O&M Cost (see Section 6(b)(iii)): ^q		
TOTAL COST: ^q		

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 146, which equates to 69 be one additional new source per year that will become subject to the rule over the three-year period of this ICR.
- ^b This ICR uses the following labor rates: \$120.22 per hour for Executive, Administrative, and Managerial labor; \$94.79 per hour for United States Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment Statistics, column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available.
- ^c This applies only to coating and printing facilities.
- ^d This applies only to slashing, dyeing and finishing facilities.
- ^e Occurs one time for new sources and involves one-time startup costs associated with initial compliance determination and recordkeeping and reporting.
- ^f It is assumed that 20 percent of respondents will have to repeat performance tests.
- ^g We have assumed that it will take 40 hours for each respondent to coordinate with suppliers.
- ^h We have assumed that 10 percent of respondents will report monitoring exceedances.
- ⁱ We have assumed that 90 percent of respondents will report no excess emissions.
- ^j We have assumed that 10 percent of respondents will file a startup, shutdown, malfunction reports.
- ^k Semiannual reports are required.
- ^l It is assumed that 10 percent of respondents will report compliance deviations.
- ^m It is assumed that 90 percent of respondents will report no compliance deviations.
- ⁿ It is assumed that all of the respondents will be required to record information on a weekly basis.
- ^o It is assumed that respondents will be required to transmit/disclose information on a semiannual basis.
- ^p It is assumed that 20 percent of the coating and printing facilities will use solvent recovery equipment.
- ^q Totals have been rounded to 3 significant values. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Printing, Coating and Dyeing of Fabrics and Other T

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year
1. Initial performance test ^c	495	1
2. Repeat performance test preparations ^{c, e}	4	0.1
3. Repeat performance test ^{c, e}	495	0.1
4. Report Review		
Notification of applicability	2	1
Notification of construction/ reconstruction	2	1
Notification of anticipated startup	2	1
Notification of actual startup	2	1
Notification of initial performance test ^c	2	1
Notification of compliance status ^c	2	1
Review of initial performance test report ^c	8	1
Review of repeat performance test report ^{c, f}	8	0.1
Review of excess emissions report ^{c, g}	8	1
Review of no excess emissions report ^{c, h}	2	1
Review of startup, shutdown, malfunction reports ^{c, i}	2	1
Review of compliance deviations report ^{d, j}	8	1
Review of no compliance deviations reports ^{d, k}	2	1
TOTAL ANNUAL BURDEN AND COST ^l		

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 145, which equates to 70 slashing, dyeing, and finishing sources. There will be one additional new source per year that will become subject to the rule.
- ^b This cost is based on the following labor rates which incorporate a 1.6 benefits multiplication factor to account for government contributions: Professional rate of \$46.67 (GS-12, Step 1, \$29.17 x 1.6), and Clerical rate of \$25.25 (GS-6, Step 3, \$15.78 x 1.6). These rates are from the 2013 Bureau of Economic Analysis (BEA) Survey of Professional and Clerical Occupations.
- ^c This applies only to coating and printing facilities.
- ^d This applies only to slashing, dyeing and finishing facilities.
- ^e We have assumed that 10 percent of new sources will have to repeat performance test preparations and testing.
- ^f Assume that 10 percent of new sources will review the repeat performance test report.
- ^g We have assumed that 10 percent of respondents will be engaged in the reviewing of excess emissions reports.
- ^h We have assumed that 90 percent of respondents will be engaged in the reviewing of no excess emissions reports.

ⁱ We have assumed that 10 percent of respondents will have to review the startup, shutdown, malfunction reports.

^j We have assumed that 10 percent of respondents will review the compliance deviations report.

^k We have assumed that 90 percent of respondents will review the no compliance deviations report.

^lTotals have been rounded to 3 significant values. Figures may not add exactly due to rounding.

extiles (40 CFR Part 63, Subpart OOOO) (Amendments)

(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(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, \$ ^b
4	146	584	29.2	58.4	\$61,091
280	1	280	14	28	\$29,290
280	0.2	56	2.8	5.6	\$5,858
215	1	215	10.75	21.5	\$22,491
215	0.2	43	2.15	4.3	\$4,498
40	1	40	2	4	\$4,184
48	14.4	691.2	34.56	69.12	\$72,305
48	146	7,008	350.4	700.8	\$733,095
40	146	5,840	292	584	\$610,913
2	1	2	0.1	0.2	\$209
2	1	2	0.1	0.2	\$209
2	1	2	0.1	0.2	\$209
2	1	2	0.1	0.2	\$209
4	1	4	0.2	0.4	\$418
2	1	2	0.1	0.2	\$209
40	1	40	2	4	\$4,184
32	7.2	230.4	11.52	23.04	\$24,102
16	64.8	1,037	51.84	103.68	\$108,458
16	7.2	115.2	5.76	11.52	\$12,051
32	7.4	236.8	11.84	23.68	\$24,771
16	66.6	1,066	53.28	106.56	\$111,471
			20,120		\$1,830,228

13	146	1,898	94.9	189.8	\$198,547
0.5	146	73	3.65	7.3	\$7,636
			2,267		\$206,183
			22,400		\$2,040,000
					\$6,750
					\$2,050,000

coating and printing sources, and 74 slashing, dyeing, and finishing sources. There will

r hour for Technical labor, and \$38.03 per hour for Clerical labor. These rates are from the
 ployment and Wage Estimates NAICS 313000 - Textile Mills." The rates are from
 to those employed by private industry.

acquisition, installation, and utilization of technology and systems needed to support

(C) EPA person hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
495	1	495	24.75	49.5	\$26,691
0.4	1	0.4	0.02	0.04	\$22
49.5	1	49.5	2.475	4.95	\$2,669
2	1	2	0.1	0.2	\$108
2	1	2	0.1	0.2	\$108
2	1	2	0.1	0.2	\$108
2	1	2	0.1	0.2	\$108
2	1	2	0.1	0.2	\$108
2	1	2	0.1	0.2	\$108
8	1	8	0.4	0.8	\$431
0.8	1	0.8	0.04	0.08	\$43
8	7.2	57.6	2.88	5.76	\$3,106
2	64.8	129.6	6.48	12.96	\$6,988
2	7.2	14.4	0.72	1.44	\$776
8	7.4	59.2	2.96	5.92	\$3,192
2	66.6	133.2	6.66	13.32	\$7,182
			1,100		\$51,700

coating and printing sources, and 75

rule over the three-year period of this ICR.

ment overhead expenses: Managerial rate of \$62.90 (GS-13, Step 5, \$39.31 x 1.6), Technical rate
the Office of Personnel Management (OPM) “2015 General Schedule” which excludes locality rates of pay.

72 coating and printing facilities

74 slashing, dyeing, and finishing facilities

146 Total

72 coating and printing facilities

74 slashing, dyeing, and finishing facilities

146 Total

Table 1 - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements - NESHAP - Year 1 (A)

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1 Familiarization with rule requirements ^c	4	1	4
2 Plan activities	0	0	0
3 Training ^d	8	1	8
Due To Proposed Revisions ^e	0	0	0
4 Add-on control performance test ^f	30	1	30
Repeat failed performance test ^g	30	1	30
5 Gather info, monitor, inspect, and determine compliance ^h	12	12	144
6 Process/compile and review ⁱ	8	12	96
7 Complete notifications and reports ^j	8	2	16
Subtotal for Reporting Requirements			
8 Record/transmit/disclose ^k	2	52	104
Due To Proposed Revisions ^l	8	2	16
9 Store/file ^m	0.25	2	0.5
10 Reporting and recordkeeping	0	0	0
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded)			
Capital and O&M Cost (see Section 6(b)(iii)):			
TOTAL COST			

Assumptions:

^a It is assumed that there are forty two sources that are subject to the standard, and no additional new sources will become subject to the standard.

^b This ICR uses the following labor rates: \$120.22 per hour for Executive, Administrative, and Managerial labor; \$94.79 per hour for other labor. The Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and Wages" have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c It is assumed that each respondent will take 4 hours to read the rule and instructions.

^d The current ICR assumes each respondent will take eight hours, once per year to plan activities and train staff. The proposed ICR assumes each respondent will take eight hours, once per year to plan activities and train staff.

^e EPA did not identify any add-on control technologies, other equipment or work practices and procedures that had not been promulgated with the NESHAP. Therefore, no additional training is required.

^f If a source owner or operator chooses to comply with the standards using add-on controls, the results of an initial performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting comment on whether such testing adversely affect compliance with an applicable standard, operating limit, or parametric monitoring value.

^g Performance testing is not currently required after the initial performance test.

^h The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take twelve hours to gather information on monitoring and emissions.

ⁱ The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take eight hours to process/compile and review.

^j The current ICR assumes that each respondent will take eight hours twice per year to complete reports. The proposed RTR amendments do not impact this item.

^k The current ICR assumes each respondent will take one hour two times per week to record and disclose information. EPA is requesting comment on whether the date of the final rule. It is assumed that this will not increase labor.

^l We are proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Costs associated with the use of electronic reporting systems in year one. Costs are also associated with the use of electronic reporting and include time to become familiar with the systems.

^m The proposed RTR amendments do not impact this item. The current ICR assumes that each respondent will take half an hour to complete the reporting.

**Requirements for the Printing, Coating, and Dyeing of Fabrics and Other Textiles
(Amendments)**

(D)	(E)	(F)	(G)	(H)	(I)	(J)
Respondents per year ^a	Total Number of Responses per Year (E=BxD)	Technical person-hours per year (F=CxD)	Management person hours per year (G=Fx0.05)	Clerical person hours per year (H=Fx0.1)	Total Hours per Year (I=F+G+H)	Total Cost Per year ^b
43	43	172	8.6	17.2	197.8	\$17,993
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
198						\$17,993
0	0	0	0	0	0	\$0
43	86	688	34.4	68.8	791.2	\$71,971
0	0	0	0	0	0	\$0
0	0	0	0	0	0	\$0
791						\$71,971
						\$90,000
						\$0
						\$90,000

me subject to the rule over the next three years.

r hour for Technical labor, and \$38.03 per hour for Clerical labor. These rates are from the United States
age Estimates NAICS 313000 - Textile Mills." The rates are from column 1, "Total Compensation." The rates

posed RTR amendments do not impact this item.

viously been considered during development of the NESHAP, nor did we identify any developments since the

nance test are used to determine compliance; however, the rule does not require on-going periodic performance
performance testing should be required anytime a source plans to undertake an operational change that may

urs, twelve times per year to complete task. Labor totals include hours for the facility to coordinate with suppliers,

s twelve times per year to complete task.

:TR amendments do not impact this item.

PA is proposing to require sources to electronically submit semiannual reports starting 2 years after the effective

ed with elimination of the SSM exemption include time for re-evaluating previously developed SSM record
th CEDRI and the semi-annual reporting form. Two responses with 8 hours per response.

an hour annually to store and file reports.

Table 2 - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements - NESHA - Year 2 (A)

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1 Familiarization with rule requirements ^c	4	1	4
2 Plan activities	0	0	0
3 Training ^d	8	1	8
Due To Proposed Revisions ^e	0	0	0
4 Add-on control performance test ^f	30	1	30
Repeat failed performance test ^g	30	1	30
5 Gather info, monitor, inspect, and determine compliance ^h	12	12	144
6 Process/compile and review ⁱ	8	12	96
7 Complete notifications and reports ^j	8	2	16
Subtotal for Reporting Requirements			
8 Record/transmit/disclose ^k	2	52	104
Due To Proposed Revisions ^l	8	2	16
9 Store/file ^m	0.25	2	0.5
10 Reporting and recordkeeping	0	0	0
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded)			
Capital and O&M Cost (see Section 6(b)(iii)):			
TOTAL COST			

Assumptions:

^a It is assumed that there are forty two sources that are subject to the standard, and no additional new sources will become subject to the standard.

^b This ICR uses the following labor rates: \$120.22 per hour for Executive, Administrative, and Managerial labor; \$94.79 per hour for Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and Wages by Detailed Occupation." These rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c It is assumed that each respondent will take 4 hours to read the rule and instructions.

^d The current ICR assumes each respondent will take eight hours, once per year to plan activities and train staff. The proposed ICR assumes each respondent will take four hours, once per year to plan activities and train staff.

^e EPA did not identify any add-on control technologies, other equipment or work practices and procedures that had not previously been required by the promulgation of the NESHA. Therefore, no additional training is required.

^f If a source owner or operator chooses to comply with the standards using add-on controls, the results of an initial performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting comment on whether such testing adversely affect compliance with an applicable standard, operating limit, or parametric monitoring value.

^g Performance testing is not currently required after the initial performance test.

^h The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take twelve hours to gather information on monitoring and emissions.

ⁱ The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take eight hours to process and compile reports.

^j The current ICR assumes that each respondent will take eight hours twice per year to complete reports. The proposed RTR amendments assume each respondent will take eight hours once per year to complete reports.

^k The current ICR assumes each respondent will take one hour two times per week to record and disclose information. EPA is requesting comment on whether the date of the final rule. It is assumed that this will not increase labor.

^l We are proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Costs associated with the use of electronic reporting systems in year one. Costs are also associated with the use of electronic reporting and include time to become familiar with the systems.

^m The proposed RTR amendments do not impact this item. The current ICR assumes that each respondent will take half an hour to complete the reporting.

ed with elimination of the SSM exemption include time for re-evaluating previously developed SSM record
th CEDRI and the semi-annual reporting form. Two responses with 8 hours per response.

an hour annually to store and file reports.

Table 3 - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements - NESHA - Year 3 (A)

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1 Familiarization with rule requirements ^c	4	1	4
2 Plan activities	0	0	0
3 Training ^d	8	1	8
Due To Proposed Revisions ^e	0	0	0
4 Add-on control performance test ^f	30	1	30
Repeat failed performance test ^g	30	1	30
5 Gather info, monitor, inspect, and determine compliance ^h	12	12	144
6 Process/compile and review ⁱ	8	12	96
7 Complete notifications and reports ^j	8	2	16
Subtotal for Reporting Requirements			
8 Record/transmit/disclose ^k	2	52	104
Due To Proposed Revisions ^l	8	2	16
9 Store/file ^m	0.25	2	0.5
10 Reporting and recordkeeping	0	0	0
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded)			
Capital and O&M Cost (see Section 6(b)(iii)):			
TOTAL COST			

Assumptions:

^a It is assumed that there are forty two sources that are subject to the standard, and no additional new sources will becom

^b This ICR uses the following labor rates: \$120.22 per hour for Executive, Administrative, and Managerial labor; \$94.79 per Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and We have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c It is assumed that each respondent will take 4 hours to read the rule and instructions.

^d The current ICR assumes each respondent will take eight hours, once per year to plan activities and train staff. The prop

^e EPA did not identify any add-on control technologies, other equipment or work practices and procedures that had not promulgation of the NESHA. Therefore, no additional training is required.

^f If a source owner or operator chooses to comply with the standards using add-on controls, the results of an initial perform testing for these emission capture systems and add-on controls. The EPA specifically is requesting comment on whether p adversely affect compliance with an applicable standard, operating limit, or parametric monitoring value.

^g Performance testing is not currently required after the initial performance test.

^h The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take twelve ho and gather information on monitoring and emissions.

ⁱ The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take eight hour

^j The current ICR assumes that each respondent will take eight hours twice per year to complete reports. The proposed R

^k The current ICR assumes each respondent will take one hour two times per week to record and disclose information. EF date of the final rule. It is assumed that this will not increase labor.

^l We are proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Costs associated with installing and testing monitoring systems in year one. Costs are also associated with the use of electronic reporting and include time to become familiar with the system.

^m The proposed RTR amendments do not impact this item. The current ICR assumes that each respondent will take half a day to complete the reporting requirements.

ed with elimination of the SSM exemption include time for re-evaluating previously developed SSM record
th CEDRI and the semi-annual reporting form. Two responses with 8 hours per response.

an hour annually to store and file reports.

Table 4 - Summary of Annual Respondent Burden and Cost of Record Requirements for the Printing, Coating, and Dyeing of Fabrics and O (Amendments)

Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Costs
1	860	86	43	989	\$90,000
2	0	0	0	0	\$0
3	0	0	0	0	\$0
Total	860	86	43	989	\$90,000
Average	287	29	14	330	\$30,000

Year	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours
1	43	129	198	791	989
2	43	0	0	0	0
3	43	0	0	0	0
Total	43	129	198	791	989
Average	43	43	66	264	330

(a) = Average annual per respondent cost: \$700

**Keeping and Reporting
the Textiles NESHAP**

Non-Labor (Capital/Startup and O&M) Costs	Total Costs
\$0	\$90,000
\$0	\$0
\$0	\$0
\$0	\$90,000
\$0	\$30,000
Hours per Response	Hours Per Respondent
7.7	23.0
0	0
0.0	0
7.7	23.0
2.6	7.7

**Table 5 - Annual Agency Burden and Cost of Recordkeeping and Reporting I
Other Textiles NESHAP - Year**

Activity	(A)	(B)
	EPA person-hours per occurrence	No. of occurrences per plant per year
1 Add-on control performance test ^{a, c, d}	24	0
2 Repeat failed performance test ^d	24	0
3 Report review		
a) Initial notification ^e	10	1
b) Performance test report ^f	20	1
c) Notification of compliance status ^g	8	1
d) Semiannual reports ^h	12	2
Due To Proposed Revisions ⁱ	2	1
TOTAL ANNUAL BURDEN AND COST (rounded)		

Assumptions:

^a It is assumed that there are forty two sources that are subject to the standard, and no additional new sources.

^b This cost is based on the following labor rates: Managerial rate of \$64.80 (GS-13, Step 5, \$40.50 + 60%), Technical rate of \$16.26 (GS-11, Step 3, \$10.16 + 60%). These rates are from the Office of Personnel Management (OPM), 2017 General Schedule (GS) pay rates, which account for the benefit packages available to government employees.

^c The proposed RTR amendments do not impact this item. The current ICR assumes it will take 24 hours to complete.

^d If a source owner or operator chooses to comply with the standards using add-on controls, the results of an add-on control performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting a change that may adversely affect compliance with an applicable standard, operating limit, or parametric monitoring.

^e It is assumed that the periodic testing requirement will take four hours to review the notification of the test results.

^f It is assumed that periodic testing requirement will take eight hours to review the test report for each response.

^g The proposed RTR amendments do not impact this item. The current ICR assumes that it will take eight hours to complete.

^h The proposed RTR amendments do not impact this item. The current ICR assumes that it will take twelve hours to complete.

ⁱ EPA is proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Cost of recordkeeping systems in year one.

Requirements for the Printing, Coating, and Dyeing of Fabrics and Paper 1 (Amendments)

(C)	(D)	(E)	(F)	(G)	(H)
EPA person-hours per plant per year (C=AxB)	Plants per year ^a	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$ ^b
0	0	0	0	0	\$0
0	0	0	0	0	\$0
					\$0
10	0	0	0	0	\$0
20	0	0	0	0	\$0
8	0	0	0	0	\$0
24	0	0	0	0	\$0
2	42	84	4.2	8.4	\$4,529
97					\$4,500

Plants will become subject to the rule over the next three years.

Technical rate of \$48.08 (GS-12, Step 1, \$30.05 + 60%), and Clerical rate of \$26.02 (GS-6, Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to

complete the task for each respondent.

Initial performance test are used to determine compliance; however, the rule does not require on-going periodic testing. The rule requires a written comment on whether performance testing should be required anytime a source plans to undertake an operational change that would increase the value.

Develop the test plan for each respondent.

Identify the test plan.

Review the test plan, once a year to review the compliance stats for each respondent.

Review the test reports, twice a year for each respondent.

Costs associated with elimination of the SSM exemption include time for evaluating new SSM

**Table 6 - Annual Agency Burden and Cost of Recordkeeping and Reporting I
Other Textiles NESHAP - Year**

Activity	(A)	(B)
	EPA person-hours per occurrence	No. of occurrences per plant per year
1 Add-on control performance test ^{a, c, d}	24	0
2 Repeat failed performance test ^d	24	0
3 Report review		
a) Initial notification ^e	10	1
b) Performance test report ^f	20	1
c) Notification of compliance status ^g	8	1
d) Semiannual reports ^h	12	2
Due To Proposed Revisions ⁱ	2	2
TOTAL ANNUAL BURDEN AND COST (rounded)		

Assumptions:

^a It is assumed that there are forty two sources that are subject to the standard, and no additional new sources.

^b This cost is based on the following labor rates: Managerial rate of \$64.80 (GS-13, Step 5, \$40.50 + 60%), Technical rate of \$16.26 (GS-05, Step 3, \$10.16 + 60%). These rates are from the Office of Personnel Management (OPM), 2017 General Schedule (GS) Pay Schedule, which account for the benefit packages available to government employees.

^c The proposed RTR amendments do not impact this item. The current ICR assumes it will take 24 hours to complete.

^d If a source owner or operator chooses to comply with the standards using add-on controls, the results of an add-on control performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting a change that may adversely affect compliance with an applicable standard, operating limit, or parametric monitoring.

^e It is assumed that the periodic testing requirement will take four hours to review the notification of the test results.

^f It is assumed that periodic testing requirement will take eight hours to review the test report for each response.

^g The proposed RTR amendments do not impact this item. The current ICR assumes that it will take eight hours to complete.

^h The proposed RTR amendments do not impact this item. The current ICR assumes that it will take twelve hours to complete.

ⁱ EPA is proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Cost of record systems in year one.

Requirements for the Printing, Coating, and Dyeing of Fabrics and Paper 2 (Amendments)

(C)	(D)	(E)	(F)	(G)	(H)
EPA person-hours per plant per year (C=AxB)	Plants per year ^a	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$ ^b
0	0	0	0	0	\$0
0	0	0	0	0	\$0
					\$0
10	0	0	0	0	\$0
20	0	0	0	0	\$0
8	0	0	0	0	\$0
24	0	0	0	0	\$0
4	0	0	0	0	\$0
0					\$0

Plants will become subject to the rule over the next three years.

Technical rate of \$48.08 (GS-12, Step 1, \$30.05 + 60%), and Clerical rate of \$26.02 (GS-6, Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to

complete the task for each respondent.

Initial performance test are used to determine compliance; however, the rule does not require on-going periodic testing. The rule requires a comment on whether performance testing should be required anytime a source plans to undertake an operational change that would increase the value.

Develop the test plan for each respondent.

Identify the respondent.

Review the test reports, once a year to review the compliance stats for each respondent.

Review the test reports, twice a year for each respondent.

Resources associated with elimination of the SSM exemption include time for evaluating new SSM

**Table 7 - Annual Agency Burden and Cost of Recordkeeping and Reporting I
Other Textiles NESHAP - Year**

Activity	(A)	(B)
	EPA person-hours per occurrence	No. of occurrences per plant per year
1 Add-on control performance test ^{a, c, d}	24	0
2 Repeat failed performance test ^d	24	0
3 Report review		
a) Initial notification ^e	10	1
b) Performance test report ^f	20	1
c) Notification of compliance status ^g	8	1
d) Semiannual reports ^h	12	2
Due To Proposed Revisions ⁱ	2	2
TOTAL ANNUAL BURDEN AND COST (rounded)		

Assumptions:

^a It is assumed that there are forty two sources that are subject to the standard, and no additional new sources.

^b This cost is based on the following labor rates: Managerial rate of \$64.80 (GS-13, Step 5, \$40.50 + 60%), Technical rate of \$16.26 (GS-05, Step 3, \$10.16 + 60%). These rates are from the Office of Personnel Management (OPM), 2017 General Schedule (GS) pay rates, which account for the benefit packages available to government employees.

^c The proposed RTR amendments do not impact this item. The current ICR assumes it will take 24 hours to complete.

^d If a source owner or operator chooses to comply with the standards using add-on controls, the results of an add-on control performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting a change that may adversely affect compliance with an applicable standard, operating limit, or parametric monitoring.

^e It is assumed that the periodic testing requirement will take four hours to review the notification of the test results.

^f It is assumed that periodic testing requirement will take eight hours to review the test report for each response.

^g The proposed RTR amendments do not impact this item. The current ICR assumes that it will take eight hours to complete.

^h The proposed RTR amendments do not impact this item. The current ICR assumes that it will take twelve hours to complete.

ⁱ EPA is proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Cost of record systems in year one.

Requirements for the Printing, Coating, and Dyeing of Fabrics and Paper 3 (Amendments)

(C)	(D)	(E)	(F)	(G)	(H)
EPA person-hours per plant per year (C=AxB)	Plants per year ^a	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$ ^b
0	0	0	0	0	\$0
0	0	0	0	0	\$0
					\$0
10	0	0	0	0	\$0
20	0	0	0	0	\$0
8	0	0	0	0	\$0
24	0	0	0	0	\$0
4	0	0	0	0	\$0
0					\$0

Plants will become subject to the rule over the next three years.

Technical rate of \$48.08 (GS-12, Step 1, \$30.05 + 60%), and Clerical rate of \$26.02 (GS-6, Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to

complete the task for each respondent.

Initial performance test are used to determine compliance; however, the rule does not require on-going periodic testing. The rule requires a written comment on whether performance testing should be required anytime a source plans to undertake an operational change that would increase the value.

Develop the test plan for each respondent.

Identify the test plan.

Review the test plan, once a year to review the compliance stats for each respondent.

Review the test reports, twice a year for each respondent.

Costs associated with elimination of the SSM exemption include time for evaluating new SSM

Table 8 - Summary of Annual Agency Burden and Cost of Recordkeeping and Requirements for the Printing, Coating, and Dyeing of Fabrics and Other Textile (Amendments)

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs
1	84	4	8	97	\$4,500	\$0
2	0	0	0	0	\$0	\$0
3	0	0	0	0	\$0	\$0
Total	84	4	8	97	\$4,500	\$0
Average	28	1	3	32	\$1,500	\$0

Year	Number of Responses	Total Hours
1	42	97
2	0	0
3	0	0
Total	42	97
Average	14	32

(a)

(a) = Average annual hours per respondent: 2.3

**Reporting
as NESHAP**

Total Costs
\$4,500
\$0
\$0
\$4,500
\$1,500