

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (Renewal), EPA ICR Number 2071.07, OMB Control Number 2060-0522.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Printing, Coating and Dyeing of Fabrics and Other Textiles were proposed on July 11, 2002, promulgated on May 29, 2003, and amended on both April 4, 2004, and May 24, 2006. These regulations apply to each existing, new, or reconstructed source involved in printing, coating, slashing, dyeing or finishing of fabric and other textiles. 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 OOOO.

In general, all NESHAP standards require initial notifications, 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 the NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements 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. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

The “Affected Public” are owners and operators of existing fabric and other textiles printing, coating and dyeing operations. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (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 Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (Renewal).

There are approximately 43 printing, coating and dyeing of fabrics and other textiles facilities, which are owned and operated by the printing, coating and dyeing of fabrics and other

textiles industry. None of the 43 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.

Based on our consultations with industry representatives, there is an average of one affected facility 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 43 respondents per year will be subject to these standards. The estimate consists of 36 coating and printing sources, and 12 slashing, dyeing, and finishing sources (note: some facilities have both types of operations). We also estimate that no additional coating and printing sources will become subject to these same standards. Based on our search of the National Emission Inventory (NEI) and EPA's Enforcement and Compliance History Online (ECHO) database ([www.echo.epa.gov](http://www.echo.epa.gov)) and a review of active air emissions permits, we estimate that 43 facilities are subject to the NESHAP standards for Printing, Coating, and Dyeing of Fabrics and Other Textiles. These estimates, which represent a significant decrease in the number of respondents from the previously-approved ICR, are based on Agency analyses conducted during the development of the Risk and Technology Review for this subpart.

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 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, hazardous air pollutant (HAP) emissions from printing, coating and dyeing of fabrics and other textiles facilities 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 OOOO.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in these standards 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 same 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 63, Subpart OOOO.

#### **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* (83 FR 24785) on May 30, 2018. No comments were received on the

burden published in the *Federal Register* for this renewal.

### **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. Approximately 43 respondents will be subject to these same standards over the three-year period covered by this ICR. The change in the number of respondents from the previously-approved ICR is based on Agency analyses conducted during the development of the Risk and Technology Review for this subpart.

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 both the National Council of Textile Organizations, at (202) 822-8026, and the American Association of Textile Chemists & Colorists, at (919) 549-8141.

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 these same 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 facilities involved in printing, coating and dyeing of fabrics and other textiles. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below:

<b>Standard 40 CFR Part 63, Subpart OOOO</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Broadwoven Fabric Mills, Cotton	2211	313210
Broadwoven Fabric Mills, Manmade Fiber and Silk	2221	313210
Broadwoven Fabric Mills, Wool	2231	313210, 313310
Textile Goods, NEC (broadwoven fabrics of jute, linen, hemp, and ramie and hand woven fabrics)	2299	313110, 313210
Narrow Fabric Mills	2241	313220
Textile Goods, NEC (narrow woven fabric of jute, linen, hemp, and ramie)	2299	313220
Knitting Mills, NEC (knitting weft fabric and fabricating textile products, such as	2259	313240

bedspreads, curtains, or towels		
Finishing Plants, Cotton	2261	313310
Finishing Plants, Manmade	2262	313310
Knit Outerwear Mills (dyeing and finishing knit outerwear without knitting outerwear)	2253	313310, 315190
Knit Underwear Mills (dyeing and finishing underwear and nightwear without knitting garments)	2254	313310, 315190
Weft Knit Fabric Mills (finishing weft fabric without knitting weft fabric)	2257	313240, 313310
Lace and Warp Fabric Mills (Finishing lace or warp fabric without knitting lace or warp fabric)	2258	313240, 313310
Finishing Plants, NEC	2269	313310
Thread Mills (finishing thread without manufacturing thread)	2284	313110
Textile Goods, NEC (finishing hard fiber thread and yarn without manufacturing thread or yarn)	2299	313110
Coated Fabrics, Not Rubberized	2295	313320
Fabricated Rubber Products, NEC (rubberizing fabric or purchased textile products)	3069	313320
Carpets and Rugs	2273	314110
Rubber and Plastics Hose and Belting	3052	326220
Gaskets; Packing, and Sealing Devices	3053	339991
Fabricated Rubber Products, NEC (rubberizing fabric or purchased textile products)	3069	313320

#### **4(b) Information Requested**

##### **(i) Data Items**

In this ICR, all the data that are recorded or reported is required by the NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO).

A source must make the following reports:

<b>Notifications</b>	
Initial notification	§§ 63.9(b),

<b>Notifications</b>	
	63.4310(b)
Notification of intent to construction/reconstruction	§§ 63.9(b)(4), 63.4310
Notification of anticipated startup	§§ 63.9(b)(4), 63.4310
Notification of actual startup	§§ 63.9(b)(4), 63.4310
Request for extension of compliance date	§§ 63.9(c), 63.4283
Notification of performance test	§§ 63.9(e), 63.6310
Notification of compliance status	§§ 63.9(h)(2), 63.4310
Continuous monitoring system	§ 63.9(h)

<b>Reports</b>	
Performance test report	§§ 63.10(d)(2), 63.4311
Startup, shutdown, malfunction (SSM) report	§§ 63.6(e)(3), 63.4311
Excess emissions or no excess emissions report	§§ 63.10(e)(3), 63.4311

A source must keep the following records:

<b>Recordkeeping</b>	
Record of startup, shutdown, and malfunctions	§§ 63.6(e)(3), 63.4311
Records are required to be retained for five years	§§ 63.10(b)(2)

### 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**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for temperature for oxidizers, if using add-on control and capture systems.
Perform initial performance test, Reference Method 204, 204A, 204B, 204D, 204E, or 204F of appendix M to 40 CFR part 51 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:

<b>Agency Activities</b>
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, 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. 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**

The 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. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

#### **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 Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (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 6,700 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	\$147.40 (\$70.19+ 110%)
Technical	\$117.92 (\$56.15 + 110%)
Clerical	\$57.02 (\$27.15 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "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(s) 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**

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F)

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
Parametric monitoring (contractor)	\$2,953	0	\$0	\$26	43	\$1,118
<b>TOTAL (rounded)</b>			<b>\$0</b>			<b>\$1,120</b>

Note: 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 \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$1,120. 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 \$1,120. 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 \$6,900.

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

Managerial	\$65.71 (GS-13, Step 5, \$41.07 + 60%)
Technical	\$48.75 (GS-12, Step 1, \$30.47 + 60%)
Clerical	\$26.38 (GS-6, Step 3, \$16.49 + 60%)

These rates are from the Office of Personnel Management (OPM), 2018 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 Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (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 43 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 43 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(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	0	43	0	0	43
2	0	43	0	0	43
3	0	43	0	0	43
Average	0	43	0	0	43

<sup>1</sup> 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 43.

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

<b>Total Annual Responses</b>				
(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
Initial notification	0	1	0	0
Application of construction/reconstruction	0	1	0	0
Notification of anticipated startup	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of compliance status	0	1	0	0
Notification of performance test	0	1	0	0
Performance test report	0	1	0	0
Report of monitoring exceedances <sup>1</sup>	3.6	2	0	7.2

<b>Total Annual Responses</b>				
Report of no excess emissions <sup>1</sup>	32.4	2	0	64.8
Startup, shutdown, malfunction report <sup>2</sup>	3.6	2	0	7.2
Report of compliance deviation <sup>3</sup>	1.2	2	0	2.4
Report of no compliance deviations <sup>3</sup>	10.8	2	0	21.6
			Total (rounded)	103

<sup>1</sup>It is assumed that 10 percent of the 36 coating and printing sources will report monitoring exceedances semiannually. The remaining 90 percent will have no excess emissions.

<sup>2</sup>It is assumed that 10 percent of the 36 coating and printing sources will file startup, shutdown, malfunction reports semiannually.

<sup>3</sup>It is assumed that 10 percent of the 12 slashing, dyeing and finishing sources will report compliance deviations semiannually. The remaining 90 percent will have no deviations.

The number of Total Annual Responses is 103.

The total annual labor costs are \$760,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (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 in Tables 1 and 2 below, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 6,700 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (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 65 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$1,120. 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 150 labor hours at a cost of \$6,900; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (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**

The decrease in burden from the most-recently approved ICR is due to an adjustment involving more accurate estimates in the number of sources. There is a significant decrease in the number of respondents from the previously-approved ICR, as based on current Agency analyses. This decrease also results in a reduced number of responses. The decrease in the capital/startup vs. operation and maintenance (O&M) costs as calculated in section 6(b)(iii) is due to the decrease in the number of respondents and there being no additional sources projected over the next 3 years. The overall result is a decrease in burden hours and costs.

## **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 65 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 neither conduct nor 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-2014-0092. 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-2014-0092 and OMB Control Number 2060-0522 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 Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (Renewal)**

Burden item	(A) Person - hours per occurrenc e	(B) No. of occurrenc es per respondent per year	(C) Person- hours per respondent per year (C=AxB)	(D) Respondent s per year <sup>a</sup>	(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, \$ <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarization with rule requirement	4	1	4	43	172	8.6	17.2	\$22,530.62
B. Required activities								
Initial oxidizer performance test <sup>c,e</sup>	280	1	280	0	0	0	0	\$0
Repeat oxidizer performance test <sup>c,e,f</sup>	280	1	280	0	0	0	0	\$0
Initial capture performance test <sup>c,e</sup>	215	1	215	0	0	0	0	\$0
Repeat capture performance test <sup>c,e,f</sup>	215	1	215	0	0	0	0	\$0
Startup, shutdown, malfunction plan <sup>c</sup>	40	1	40	0	0	0	0	\$0
Solvent recovery system compliance determination <sup>c,p</sup>	4	12	48	7.2	345.6	17.28	34.56	\$45,270.84
Emission rate limit compliance determination	4	12	48	43	2,064	103.2	206.4	\$270,367.49
Coordination with suppliers <sup>g</sup>	40	1	40	43	1,720	86	172	\$225,306.24
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report								
Initial notification <sup>c</sup>	2	1	2	0	0	0	0	\$0



Notification of construction/reconstruction <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of anticipated startup <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of actual startup <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of compliance status <sup>c</sup>	4	1	4	0	0	0	0	\$0
Notification of performance test <sup>c, e</sup>	2	1	2	0	0	0	0	\$0
Performance test report <sup>c, e</sup>	40	1	40	0	0	0	0	\$0
Report of monitoring exceedances <sup>c, h, k</sup>	16	2	32	3.6	115.2	5.76	11.52	\$15,090.28
Report of no excess emissions <sup>c, i, k</sup>	8	2	16	32.4	518	25.92	51.84	\$67,906.25
Startup, shutdown, malfunction report <sup>c, j, k</sup>	8	2	16	3.6	57.6	2.88	5.76	\$7,545.14
Report of compliance deviation <sup>d, k, l</sup>	16	2	32	1.2	38.4	1.92	3.84	\$5,030.09
Report of no compliance deviations <sup>d, k, m</sup>	8	2	16	10.8	173	8.64	17.28	\$22,635.42
<b>Subtotal for Reporting Requirements</b>						<b>5,985</b>		<b>\$681,682.37</b>
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 <sup>n</sup>	0.25	52	13	43	559	27.95	55.9	\$73,224.53
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 <sup>o</sup>	0.25	2	0.5	43	21.5	1.075	2.15	\$2,816.33

I. Time for audits	N/A						
<b>Subtotal for Recordkeeping Requirements</b>						<b>668</b>	<b>\$76,040.86</b>
<b>TOTAL LABOR BURDEN AND COSTS <sup>a</sup></b>						<b>6,700</b>	<b>\$760,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST <sup>a</sup></b>							<b>\$1,120</b>
<b>TOTAL COST: <sup>a</sup></b>							<b>\$760,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 43, which equates to 36 coating and printing sources, and 12 slashing, dyeing, and finishing sources. There will be no additional new sources per year that will become subject to the rule over the three-year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2: Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> This applies only to coating and printing facilities.

<sup>d</sup> This applies only to slashing, dyeing and finishing facilities.

<sup>e</sup> Occurs one time for new sources and involves one-time startup costs associated with initial compliance determination and acquisition, installation, and utilization of technology and systems needed to support recordkeeping and reporting.

<sup>f</sup> It is assumed that 20 percent of respondents will have to repeat performance tests.

<sup>g</sup> We have assumed that it will take 40 hours for each respondent to coordinate with suppliers.

<sup>h</sup> We have assumed that 10 percent of respondents will report monitoring exceedances.

<sup>i</sup> We have assumed that 90 percent of respondents will report no excess emissions.

<sup>j</sup> We have assumed that 10 percent of respondents will file a startup, shutdown, malfunction reports.

<sup>k</sup> Semiannual reports are required.

<sup>l</sup> It is assumed that 10 percent of respondents will report compliance deviations.

<sup>m</sup> It is assumed that 90 percent of respondents will report no compliance deviations.

<sup>n</sup> It is assumed that all of the respondents will be required to record information on a weekly basis.

<sup>o</sup> It is assumed that respondents will be required to transmit/disclose information on a semiannual basis.

<sup>p</sup> It is assumed that 20 percent of the coating and printing facilities will use solvent recovery equipment.

<sup>q</sup> 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 Printing, Coating and Dyeing of Fabrics and Other Textiles (40 CFR Part 63, Subpart OOOO) (Renewal)**

Activity	(A) EPA person- hours per occurrenc e	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
1. Initial performance test <sup>c</sup>	495	1	495	0	0	0	0	\$0
2. Repeat performance test preparations <sup>c,e</sup>	4	0.1	0.4	0	0	0	0	\$0
3. Repeat performance test <sup>c,e</sup>	495	0.1	49.5	0	0	0	0	\$0
4. Report Review								
Notification of applicability	2	1	2	0	0	0	0	\$0
Notification of construction/ reconstruction	2	1	2	0	0	0	0	\$0
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of initial performance test <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of compliance status <sup>c</sup>	2	1	2	0	0	0	0	\$0
<sup>c</sup> Review of initial performance test report	8	1	8	0	0	0	0	\$0
<sup>c,f</sup> Review of repeat performance test report	8	0.1	0.8	0	0	0	0	\$0
Review of excess emissions report <sup>c,g</sup>	8	1	8	3.6	28.8	1.44	2.88	\$1,507.39
Review of no excess emissions report <sup>c,h</sup>	2	1	2	32.4	64.8	3.24	6.48	\$3,391.63
Review of startup, shutdown, malfunction reports <sup>c,i</sup>	2	1	2	3.6	7.2	0.36	0.72	\$376.85
Review of compliance deviations report	8	1	8	1.2	9.6	0.48	0.96	\$502.46

<b>d, j</b>								
Review of no compliance deviations reports <sup>d, k</sup>	2	1	2	10.8	21.6	1.08	2.16	\$1,130.54
<b>TOTAL ANNUAL BURDEN AND COST <sup>1</sup></b>						<b>150</b>		<b>\$6,900</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 43, which equates to 36 coating and printing sources, and 12 slashing, dyeing, and finishing sources. There will be one additional new source per year that will become subject to the rule over the three-year period of this ICR.

<sup>b</sup> This cost is based on the following labor rates which incorporate a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$62.90 (GS-13, Step 5, \$39.31 x 1.6), Technical 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 Office of Personnel Management (OPM) "2015 General Schedule" which excludes locality rates of pay.

<sup>c</sup> This applies only to coating and printing facilities.

<sup>d</sup> This applies only to slashing, dyeing and finishing facilities.

<sup>e</sup> We have assumed that 10 percent of new sources will have to repeat performance test preparations and testing.

<sup>f</sup> Assume that 10 percent of new sources will review the repeat performance test report.

<sup>g</sup> We have assumed that 10 percent of respondents will be engaged in the reviewing of excess emissions reports.

<sup>h</sup> We have assumed that 90 percent of respondents will be engaged in the reviewing of no excess emissions reports.

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

<sup>j</sup> We have assumed that 10 percent of respondents will review the compliance deviations report.

<sup>k</sup> We have assumed that 90 percent of respondents will review the no compliance deviations report.

<sup>1</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.