

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ¹	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents
1	6	185	0	0
2	6	191	0	0
3	6	197	0	0
Average	6	191	0	0

¹ New respondents include sources with constructed and reconstructed affected facilities.

Respondant Rates (Source: United States Department of Labor, Bureau of Labor Statistics, September 2018, "Table 2. Civilian Workers, by occupational and industry group.")		
Labor Type	Total Compensation (\$/hr)	Loaded Rate (Rate + 110%rate)
Mgmt.	\$70.19	\$147.40
Tech.	\$56.15	\$117.92
Cler.	\$27.15	\$57.02

Hours per Re:
12000
453
27

Capital/Startup vs. Operation and Maintenance (O&M) Costs				
(A)	(B)	(C)	(D)	(E)
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
Parametric monitoring (contractor)	\$10,000	5	\$50,000	\$25
Continuous emission monitoring system (CEMS)	\$183,500	1	\$183,500	\$26,700
Total cost (rounded) ^b			\$234,000	

^a We estimate an average of 197 sources during the three-year period of this ICR, and that 174 of these sources will use also estimate that 6 new sources per year will become subject to the rule. Of the new sources, one source will be using CEMS to monitor emissions.

^b Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

(E)
Number of Respondents (E=A+B+C-D)
191
197
203
197

response
hours
responses
hr/resp

Total		
(A)	(B)	(C)
Information Collection Activity	Number of Respondents	Number of Responses
Initial Notification	6	1
Notification of performance test	6	1
Notification of compliance status	6	1
Performance test reports	6	1
SSM reports	174	0.2
Semiannual report	197	2

Note: SSM reports are typically submitted with the source conducting emission or parametric monitoring, and all the time.

(F)	(G)
Number of Respondents with O&M ^a	Total O&M, (E X F)
174	\$4,350
23	\$614,100
	\$618,000

^a CPMS and 23 sources CEMS. We solvent recovery devices and will use

Annual Responses	
(D)	(E)
Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
0	6
0	6
0	6
0	6
0	34.8
0	394
Total	452.8

miannual reports. We assume that all 197 facilities use control devices,
 | 197 will submit an additional report of non-conforming SSM 20% of

Table 1: Annual Respondent Burden and Cost – NESHAP for Paper and Other Web Coating (40 C

	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)
1. Reporting requirements			
A. Familiarization with regulatory requirements	4	1	4
B. Gather information ^c	4	4	16
C. Write reports ^c			
i. Initial notification	2	1	2
ii. Notification of performance test	2	1	2
iii. Notification of compliance status	2	1	2
iv. Performance test reports	2	1	2
v. SSM reports ^d	2	0.2	0.4
vi. Semiannual summary report	4	2	8
<i>Subtotal for Reporting Requirements</i>			
2. Recordkeeping requirements			
A. Read instructions ^c	4	1	4
B. Plan activities ^c	15	1	15
C. Implement activities for compliance coating use ^f	5	12	60
D. Implement activities for control devices and process equipment ^c			
i. Design analysis	12	1	12
ii. Performance test oversight	20	1	20
E. Develop record system			
i. Develop startup, shutdown, malfunction plan ^c	20	1	20
ii. Develop plan for material used ^f	10	1	10
iii. Control equipment and maintenance plan ^c	10	1	10
F. Time to enter information			
i. Compliance calculation ^e	2	12	24
ii. Control equipment testing ^f	1	1	1
G. Time to train personnel			
i. Acquisition and installation ^c	15	1	15
ii. Equipment inspection and monitoring ^f	10	1	10
iii. Use of technology and systems ^f	10	1	10
H. Store, file and maintain records ^g	0.25	12	3
I. Retrieve records/reports ^g	0.25	12	3
<i>Subtotal for Recordkeeping Requirements</i>			

TOTAL LABOR BURDEN AND COST (rounded)^h

TOTAL CAPITAL AND O&M COST (rounded)^h

GRAND TOTAL COST (rounded)^h

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be 197. There will be eighteen ICR (i.e., six per year).

^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for other labor. Source: United States Department of Labor, Bureau of Labor Statistics, September 2018, "Table 2: Civilian Workers, by occupational category and occupation, by sex, race, and hispanic or latino ethnicity, by industry." Rates increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c We have assumed that this is a one-time activity for one new facility using a solvent recovery device.

^d Startup, shutdown, malfunction (SSM) reports are to be submitted twice a year with the required semiannual report, and the estimated 20 percent of the respondents using parametric monitoring will submit an additional report for a non-conforming SSM.

^e We have assumed that 21 respondents will record activities for compliance coating use.

^f We have assumed that 197 respondents for this activity.

^g We have assumed that 197 respondents will be involved in the storage, filing, maintenance and retrieval of records and reports.

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

IFR Part 63, Subpart JJJJ (Renewal)

	\$117.92	\$147.40	\$57.02	
(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
197	788	39.4	78.8	\$103,221.70
6	96	4.8	9.6	\$12,575.23
6	12	0.6	1.2	\$1,571.90
6	12	0.6	1.2	\$1,571.90
6	12	0.6	1.2	\$1,571.90
6	12	0.6	1.2	\$1,571.90
174	69.6	3.48	6.96	\$9,117.04
197	1576	78.8	157.6	\$206,443.39
	2,964			\$337,645
6	24	1.2	2.4	\$3,143.81
6	90	4.5	9	\$11,789.28
21	1260	63	126	\$165,049.92
6	72	3.6	7.2	\$9,431.42
6	120	6	12	\$15,719.04
6	120	6	12	\$15,719.04
21	210	10.5	21	\$27,508.32
6	60	3	6	\$7,859.52
21	504	25.2	50.4	\$66,019.97
197	197	9.85	19.7	\$25,805.42
6	90	4.5	9	\$11,789.28
197	1970	98.5	197	\$258,054.24
197	1970	98.5	197	\$258,054.24
197	591	29.55	59.1	\$77,416.27
197	591	29.55	59.1	\$77,416.27
	9,049			\$1,030,776

	<i>12,000</i>	<i>\$1,370,000</i>
		<i>\$852,000</i>
		<i>\$2,220,000</i>

1 additional new sources that will become subject to the rule over the three-year period of the

r hour for Technical labor, and \$56.15 per hour for Clerical labor. These rates are from the and industry group.” The rates are from column 1: “Total Compensation.” The rates have been

SSM report applies only to the estimated 174 facilities using a CMPS (see 40 CFR 63.3400). An M.

rts twelve times per year.

Last ICR

Hours

Cost

13,800	1,380,000
	1,010,000
	2,390,000

Table 2: Average Annual EPA Burden and Cost – NESHAP for Paper and Other W

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year
1. Review initial notification ^c	8	1
2. Review notification of compliance status ^c	10	1
3. Review SSM reports ^d	4	0.2
4. Review semiannual summary reports ^e	15	2
5. Review notification of performance test ^c	4	1
6. Review test results ^{c, f}	10	1
TOTAL ANNUAL BURDEN AND COST (rounded) ^g		

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be 197. Th

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to a Clerical (GS-6, Step 3). These rates are from the Office of Personnel Management (OPM) “2018 General S

^c We have assumed that this is a one-time activity for each new facility.

^d Startup, shutdown, malfunction (SSM) reports are to be submitted twice a year with the required semiann conforming SSM.

^e It is assumed that the agency will review summary reports twice per year.

^f We have assumed that it will take the agency ten hours to review test results.

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

Leak Coating (40 CFR Part 63, Subpart JJJJ) (Renewal)

		48.75	65.71	26.38
(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)
8	6	48	2.4	4.8
10	6	60	3	6
0.8	174	139.2	6.96	13.92
30	197	5910	295.5	591
4	6	24	1.2	2.4
10	6	60	3	6
			7,180	

There will be eighteen additional new sources that will become subject to the rule over the three-year period of the ICI account for government overhead expenses: \$65.71 for Managerial (GS-13, Step 5), \$48.75 for Technical (GS-12, Step 5) and \$26.38 for "Schedule" which excludes locality rates of pay.

Annual report. However, as estimated 20 percent of the respondents using parametric monitoring will submit an additic

(H)		
Cost, \$^b		
\$2,624.33		
\$3,280.41		
\$7,610.55		
\$323,120.39		
\$1,312.16	Last ICR	
\$3,280.41	Hours	Cost
\$341,000	9,080	413,000

3 (i.e., six per year).

ep 1), and \$26.38

onal report for a non-