

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for the Printing and Publishing Industry (40 CFR Part 63, Subpart KK)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for the Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (Renewal), EPA ICR Number 1739.09, OMB Control Number 2060-0335.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry were proposed on March 14, 1995, promulgated on May 30, 1998, and most-recently amended on April 21, 2011. These regulations apply to both existing and new facilities operating publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses at major sources. These standards also apply to owners and/or operators who choose to commit to and meet the criteria of establishing the facility to be an area source of hazardous air pollutants (HAP). New facilities include those that commenced construction or reconstruction after the effective date of this subpart. This information is being collected to assure compliance with 40 CFR Part 63, Subpart KK.

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 NESHAP.

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

The “Affected Public” constitutes private-sector businesses that operate printing and publishing facilities in the United States. The ‘burden’ to the Affected Public may be found below in Table 5: Annual Estimated Respondent Burden and Cost – NESHAP for the Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (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 6: Average Annual EPA Estimated Burden and Cost – NESHAP for the Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (Renewal). There are approximately 352 printing and publishing facilities, which are owned and operated by privately-owned, for-profit businesses. None of the 352 facilities in the United States

are owned by either state, local, tribal or the Federal government. 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 each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 352 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. Of the 352 facilities, 152 are major sources and 200 are area sources.

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, HAP emissions from printing and publishing 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 KK.

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 KK.

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. One comment was published in the *Federal Register* for this renewal; however, the comment did not pertain to this ICR and no response is required.

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 352 respondents will be subject to these standard over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the 'burden' associated with these standards as they were being developed. In developing this ICR, we contacted both the Flexographic Technical Association, at (631) 737-6020, and the Flexible Packaging Association (FPA), at (410) 694-0823.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, one comment was received, however, the comment did not pertain to this ICR and no response was required.

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

Except in the case of the following exception, these reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320.5(d)(2).

These standards do 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 the 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 the printing and publishing industry. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standard and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below:

40 CFR Part 63, Subpart, KK	SIC Codes	NAICS Codes
Textile Bag Mills	2392, 2393, 3069	314911
Setup Paperboard Box Manufacturing	2652	322213
Corrugated and Solid Fiber Box Manufacturing	2653, 2679	322211
Non-folding Sanitary Food Container Manufacturing	2656	322215
Folding Paperboard Box Manufacturing	2657	322212
Coated and Laminated Packaging Paper and Plastics film Manufacturing	2671	322221
Plastics, Foil, and Coated Paper Bag Manufacturing	2673	322223
Plastics Bag Manufacturing	2673	326111
Uncoated Paper and Multiwall Bag Manufacturing	2674	322224
Sanitary Paper Product Manufacturing	2676, 3842	322291
All Other Converted Paper Product Manufacturing	2675, 2679	322299
Corrugated and Solid Fiber Box Manufacturing	2653	322211
Die-Cut Paper and Paperboard Office Supplies	2675, 2679	322231

Manufacturing		
Coated and Laminated Paper Manufacturing	2672, 2679	322222
Periodical Publishers	2721, 2741	511120
All Other Publishers (except newspaper, magazine, books, directory, database, music, and greeting card publishers)	2741	511199
Commercial Gravure Printing	2754, 2771	323111
Commercial Flexographic Printing	2759, 2771	323112
Other Commercial printing	2759, 2771	323119
All Other Plastics Product Manufacturing	3089, 3999	326199
Laminated Aluminum Foil Manufacturing for Flexible Packaging Uses	3497	322225
Resilient Floor Covering Manufacturing	3069, 3996	326192

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for the Printing and Publishing Industry (40 CFR Part 63, Subpart KK).

A source must adhere to the following requirements listed in the tables below :

Table 1: Notifications/Reports	
Notification and Reporting Requirements	40 CFR Part 63 Section
Initial notification	§§63.5(d), 63.9(b), 63.10(f), §63.830(b)(1)
Notification of change in information already provided	§63.9(j)
Notification of compliance status	§63.9(h), §63.830(b)(3)
Notification of initial performance test	§§63.7(b)(1), 63.9(e), (g), §63.830(b)(2)
Rescheduled initial performance test	§63.7(b)(2)
Initial performance test results	§63.10(d),(e), §63.830(b)(4), §63.830(c)

Table 1: Notifications/Reports	
Semi-annual summary report	§63.10(e), §63.830(b)(6)
Excess emission and continuous monitoring system (CMS) performance reports	§§63.10(a), (e), §63.830(b)

Table 2: Recordkeeping	
Recordkeeping Requirements	40 CFR Part 63 Section
Startups, shutdowns, and malfunctions periods where the continuous monitoring system is inoperative.	§63.10(b)(2), §63.829(g)
Emission test results and other data needed to determine emissions, operating parameters, etc.	§§63.824(b) 63.825(b-g), 63.828(a), 63.829(b-f)
All reports and notifications	§63.10(b)
Record of applicability	§63.10(b)(3)
Records for sources with continuous monitoring systems	§63.10(c), §63.829(b)
Records of HAP usage for area sources	§63.829(d)
Record of maintenance	§63.10(b)(2), §63.829(b)

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.

As of January 1, 2012, and within 60 days after the date of completing each performance test, owners and operators of printing and publishing facilities are required to submit electronic copies of applicable reports of performance tests to EPA's WebFIRE database through an electronic emissions test report structure called the Electronic ERT. Only data collected using test methods compatible with ERT are subject to this requirement to be submitted electronically.

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:

Table 4: Agency Activities	Applicable Rules
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.	§§63.8309-10, 63.8
Audit facility records.	§63.829, 10
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.	§63.829, §63.830, 42 U.S.C. §7414(a)(1),

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. 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

A 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 at the end of this document in Table 5: Annual Estimated Respondent Burden and Cost – NESHAP for the Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 5 documents the computation of individual estimated burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual estimated burdens are listed under 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.~~

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these record-keeping and reporting requirements is estimated to be 59,800 hours (Total Labor Hours from Table 5 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 standards 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 regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor 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)
Temperature ¹	\$7,000	0	\$0	\$9,000	46	\$414,000

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

¹ This ICR assumes that 30 percent of respondents (major source), or 46 sources will be required to maintain, adjust, and calibrate CMS.

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 \$414,000. 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 \$414,000. These O&M costs are additional to the standard record-keeping 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 activities such 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 \$20,000.

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 Federal government employees. Details upon which this estimate is based appear below at the end of this document in Table 6: Average Annual EPA Estimated Burden and Cost – NESHAP for the Printing and Publishing Industry (40 CFR Part

63, Subpart KK) (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 352 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 352 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 Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	152	200	0	352
2	0	152	200	0	352
3	0	152	200	0	352
Average					352

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 352.

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 initial and HAP usage	0	1	0	0
Notification of compliance status	0	1	0	0
Notification of performance test	0	1	0	0

Total Annual Responses				
Report of performance test	0	1	0	0
Startup/shutdown/malfunction report	30	2	0	60
Semiannual excess emission and CMS performance report	76	2	0	152
Records of HAP usage (area source)	200	2	0	400
			Total	612

The number of Total Annual Responses is 612.

The total annual labor costs are \$6,810,000 (rounded). Details regarding these estimates may be found below in Table 5: Annual Estimated Respondent Burden and Cost – NESHAP for the Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (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 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 59,800 hours (rounded). Details regarding these estimates may be found in Table 5: Annual Estimated Respondent Burden and Cost – NESHAP for the Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (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 98 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$414,000. 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 419

labor hours at a cost of \$20,000; see below in Table 6: Average Annual EPA Estimated Burden and Cost – NESHAP for the Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (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 no change in the labor hours in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, this ICR assumes the respondent universe subject to the regulation has remained stable since the last ICR renewal. There is an adjustment increase in labor costs; this ICR uses updated labor rates from the Bureau of Labor Statistics.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 98 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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. [Responses to this information collection are mandatory.](#)

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-2012-0666. 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), EPA 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-2012-0666 and OMB Control Number 2060-0335 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 5: Annual Estimated Respondent Burden and Cost – NESHAP for the Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (Renewal)

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year	Respondents per year ^a	Technical person-hours per year	Management person hours per year	Clerical person hours per year	Total Cost
			(C=AxB)		(E=CxD)	(Ex0.05)	(Ex0.1)	Per year ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
a. Familiarization with the regulatory requirements ^c	4	1	4	352	1,408	70.4	140.8	\$184,436.74
b. Required activities								
Initial performance test ^d	240	1	240	0	0	0	0	\$0
Repeat performance tests ^d	240	1	240	0	0	0	0	\$0
Install CMS ^d	100	1	100	0	0	0	0	\$0
Develop CMS/QC program and test plan ^d	100	1	100	0	0	0	0	\$0
Conduct CMS performance evaluation ^d	300	1	300	0	0	0	0	\$0
Maintain, adjust, and calibrate CMS ^e	6	52	312	46	14,352	717.6	1,435.2	\$1,879,997.18
c. Create information	See 3B							
d. Gather existing information	See 3E							
e. Write report								
New Sources								
Notification of initial and HAP usage ^d	4	1	4	0	0	0	0	\$0
Notification of compliance status ^d	4	1	4	0	0	0	0	\$0

Notification of performance test ^d	2	1	2	0	0	0	0	\$0
Report of performance test ^d	40	1	40	0	0	0	0	\$0
Existing Sources								
Startup, shutdown, malfunction report ^f	2	2	4	30	120	6	12	\$15,719.04
Semiannual excess emission and CMS performance report ^g	16	2	32	76	2,432	121.6	243.2	\$318,572.54
Subtotal for Reporting Requirements					21,059			\$2,398,725.50
4 Recordkeeping requirements								
a. Familiarization with the regulatory requirements	See 3A							
b. Plan activities	N/A							
c. Implement activities	N/A							
d. Develop record system ^d	40	1	40	0	0	0	0	\$0
e. Time to enter information								
^h Records of maintenance	4	52	208	105	21,840	1,092	2,184	\$2,860,865.28
Records of startup, shutdown, and malfunction ⁱ	2	52	104	30	3,120	156	312	\$408,695.04
Records of malfunction or inoperative CMS ⁱ	2	2	4	30	120	6	12	\$15,719.04
Records of applicability determination ^d	2	1	2	0	0	0	0	\$0
Records of CMS operation ^j	2	52	104	46	4,784	239.2	478.4	\$626,665.73
Records of liquid-liquid material balances; HAP, volatile material, solids and materials applied, operating parameters ^k	2	12	24	105	2,520	126	252	\$330,099.84
Records of materials	40	1	40	2	80	4	8	\$10,479.36

used by incidental printers ¹								
Records of HAP usage (area sources) ^{m, n}	0.5	12	6	200	1,200	60	120	\$157,190.40
f. Time to train personnel	See 3A							
g. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						38,714		\$4,409,714.69
TOTAL LABOR BURDEN AND COST (rounded)^o						59,800		\$6,810,000
Capital and O&M Cost (rounded):^o								\$414,000
TOTAL COST (rounded):^o								\$7,220,000

Assumptions:

- ^a We have assumed that the average number of respondents potentially subject to this rule is 352. Of the 352 facilities, 152 are major sources, and 200 are area sources. There will be no additional new sources over the three-year period of this ICR.
- ^b 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 percent to account for the benefit packages available to those employed by private industry.
- ^c We have assumed that all facilities will take 4 hours to read and review instructions.
- ^d We have assumed that there will be no new sources during the three-year period of this ICR.
- ^e We have assumed that 30 percent of the 152 major source respondents (46 facilities) will be required to maintain, adjust, and calibrate CMS.
- ^f We have assumed that 20 percent of the 152 major source respondents (30 facilities) will have startup, shutdown, malfunction incidents with equipment or inoperative CMS reports to complete.
- ^g We have assumed that 46 facilities are fitted with CMS control, and an additional 30 facilities that may encounter excess emissions.
- ^h We have assumed that 105 facilities do not have CMS installed in them.
- ⁱ We have assumed that 20 percent of respondents (major source) will enter information on startup, shutdown, malfunction problems with equipment or inoperative CMS.
- ^j We have assumed that 46 respondents (major source) will enter information on CMS operations.
- ^k We have assumed that 105 facilities do not have CMS installed in them.
- ^l We have assumed that 2 existing facilities will be required to enter information on records of materials used by incidental printers.

^m We have assumed that 200 area sources, which includes products and packaging rotogravure and wide-web flexographic printing presses, are subject to recordkeeping requirements, and are required to keep a monthly record of HAP usage to show that they are meeting the limit.

ⁿ We have assumed that it will take each respondent 0.5 hours to record HAP usage.

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

Table 6: Average Annual EPA Estimated Burden and Cost – NESHAP for the Printing and Publishing Industry (40 CFR Part 63, Subpart KK) (Renewal)

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year	Plants per year ^a	Technical person-hours per year	Management person-hours per year	Clerical person-hours per year	Cost, \$ ^b
			(C=AxB)		(E=CxD)	(Ex0.05)	(Ex0.1)	
Required activities								
New sources								
Initial performance tests ^c	24	1	24	0	0	0	0	\$0
Repeat performance tests ^c	24	1	24	0	0	0	0	\$0
Report review								
New sources								
Notification of initial startup ^c	2	1	2	0	0	0	0	\$0
Notification of compliance status ^c	4	1	4	0	0	0	0	\$0
Notification of performance test ^c	1	1	1	0	0	0	0	\$0
Review test results ^c	8	1	8	0	0	0	0	\$0
Existing sources								
Semiannual excess emissions and CMS performance report ^d	2	2	4	76	304	15.2	30.4	\$16,620.74
Periodic startup, shutdown, malfunction report ^e	2	1	2	30	60	3	6	\$3,280.41
TOTAL ANNUAL BURDEN AND COST (rounded) ^f						419		\$20,000

Assumptions:

^a We have assumed that the average number of respondents potentially subject to this rule is 352. Of the 352 facilities, 152 are major sources, and 200 are area sources. There will be no additional new sources over the three-year period of this ICR.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$65.71 for Managerial, \$48.75 for Technical, and \$26.38 Clerical. These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which excludes locality rates of pay.

- ^c We have assumed that there will be no new sources during the three-year period of this ICR.
- ^d We have assumed that 46 facilities are fitted with CMS control, and an additional 30 facilities that may encounter excess emissions.
- ^e We have assumed that 20 percent of 152 major sources (30 facilities) will be required to submit periodic startup, shutdown, malfunction report.
- ^f Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.