

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. Applications	N/A		
2. Surveys and studies	N/A		
3. Reporting requirements			
a. Familiarization with the regulatory requirements <sup>c</sup>	4	1	4
b. Required activities			
Initial performance test <sup>d</sup>	240	1	240
Repeat performance tests <sup>d</sup>	240	1	240
Install CMS <sup>d</sup>	100	1	100
Develop CMS/QC program and test plan <sup>d</sup>	100	1	100
Conduct CMS performance evaluation <sup>d</sup>	300	1	300
Maintain, adjust, and calibrate CMS <sup>e</sup>	6	52	312
c. Create information	See 3B		
d. Gather existing information	See 3E		
e. Write report			
New Sources			
Notification of initial and HAP usage <sup>d</sup>	4	1	4
Notification of compliance status <sup>d</sup>	4	1	4
Notification of performance test <sup>d</sup>	2	1	2
Report of performance test <sup>d</sup>	40	1	40
Existing Sources			
Startup, shutdown, malfunction report <sup>f</sup>	2	2	4
Semiannual excess emission and CMS performance report <sup>g</sup>	16	2	32
<b>Subtotal for Reporting Requirements</b>			
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 <sup>d</sup>	40	1	40
e. Time to enter information			
Records of maintenance <sup>h</sup>	4	52	208
Records of startup, shutdown, and malfunction <sup>i</sup>	2	52	104
Records of malfunction or inoperative CMS <sup>i</sup>	2	2	4
Records of applicability determination <sup>d</sup>	2	1	2
Records of CMS operation <sup>j</sup>	2	52	104
Records of liquid-liquid material balances; HAP, volatile material, solids and materials applied, operating parameters <sup>k</sup>	2	12	24
Records of materials used by incidental printers <sup>l</sup>	40	1	40
Records of HAP usage (area sources) <sup>m, n</sup>	0.5	12	6
f. Time to train personnel	See 3A		
g. Time for audits	N/A		
<b>Subtotal for Recordkeeping Requirements</b>			

<b>TOTAL LABOR BURDEN AND COST (rounded) °</b>			
<b>Capital and O&amp;M Cost (rounded): °</b>			
<b>TOTAL COST (rounded): °</b>			

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents potentially subject to this rule is 352. Of the 352 facilities, 152 are subject to this rule during 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 all other labor. Labor rates are based on the United States Department of Labor, Bureau of Labor Statistics, June 2018, Table 2. Civilian Workers, by Occupational and Industry, and are increased by 110 percent to account for the benefit packages available to those employed by private industry.
- <sup>c</sup> We have assumed that all facilities will take 4 hours to read and review instructions.
- <sup>d</sup> We have assumed that there will be no new sources during the three-year period of this ICR.
- <sup>e</sup> We have assumed that 30 percent of the 152 major source respondents (46 facilities) will be required to maintain, adjust, and update their records during the three-year period of this ICR.
- <sup>f</sup> We have assumed that 20 percent of the 152 major source respondents (30 facilities) will have startup, shutdown, malfunction, or maintenance events during the three-year period of this ICR.
- <sup>g</sup> We have assumed that 46 facilities are fitted with CMS control, and an additional 30 facilities that may encounter excess emissions events during the three-year period of this ICR.
- <sup>h</sup> We have assumed that 105 facilities do not have CMS installed in them.
- <sup>i</sup> We have assumed that 20 percent of respondents (major source) will enter information on startup, shutdown, malfunction, or maintenance events during the three-year period of this ICR.
- <sup>j</sup> We have assumed that 46 respondents (major source) will enter information on CMS operations.
- <sup>k</sup> We have assumed that 105 facilities do not have CMS installed in them.
- <sup>l</sup> We have assumed that 2 existing facilities will be required to enter information on records of materials used by incidental sources during the three-year period of this ICR.
- <sup>m</sup> We have assumed that 200 area sources, which includes products and packaging rotogravure and wide-web flexographic printing, will be required to maintain a monthly record of HAP usage to show that they are meeting the limit.
- <sup>n</sup> We have assumed that it will take each respondent 0.5 hours to record HAP usage.
- <sup>o</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

(D)	(E)	(F)	(G)	(H)
Respondents per year <sup>a</sup>	Technical person- hours per year	Management person hours per year	Clerical person hours per year	Total Cost
	(E=CxD)	(Ex0.05)	(Ex0.1)	Per year <sup>b</sup>
352	1,408	70.4	140.8	\$184,436.74
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
46	14,352	717.6	1,435.2	\$1,879,997.18
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
30	120	6	12	\$15,719.04
76	2,432	121.6	243.2	\$318,572.54
		<b>21,059</b>		<b>\$2,398,725.50</b>
0	0	0	0	\$0
105	21,840	1,092	2,184	\$2,860,865.28
30	3,120	156	312	\$408,695.04
30	120	6	12	\$15,719.04
0	0	0	0	\$0
46	4,784	239.2	478.4	\$626,665.73
105	2,520	126	252	\$330,099.84
2	80	4	8	\$10,479.36
200	1,200	60	120	\$157,190.40
		<b>38,714</b>		<b>\$4,409,714.69</b>

Technical 117.92  
Managerial 147.4  
Clerical 57.02

	<b>59,800</b>			<b>\$6,810,000</b>
				<b>\$414,000</b>
				<b>\$7,220,000</b>

98 hr/resp

are major sources, and 200 are area sources. There will be no additional new sources over

per hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are from the Industry group. The rates are from column 1, Total Compensation. The rates have been

and calibrate CMS.

tion incidents with equipment or inoperative CMS reports to complete.

missions.

problems with equipment or inoperative CMS.

printers.

printing presses, are subject to recordkeeping requirements, and are required to keep a

Activity	(A)	(B)	(C)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year
			(C=AxB)
Required activities			
New sources			
Initial performance tests <sup>c</sup>	24	1	24
Repeat performance tests <sup>c</sup>	24	1	24
Report review			
New sources			
Notification of initial startup <sup>c</sup>	2	1	2
Notification of compliance status <sup>c</sup>	4	1	4
Notification of performance test <sup>c</sup>	1	1	1
Review test results <sup>c</sup>	8	1	8
Existing sources			
<sup>d</sup> Semiannual excess emissions and CMS performance report	2	2	4
Periodic startup, shutdown, malfunction report <sup>e</sup>	2	1	2
<b>TOTAL ANNUAL BURDEN AND COST (rounded) <sup>f</sup></b>			

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents potentially subject to this rule is 352. Of the 352 facilities, 1
- <sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government Clerical. These rates are from the Office of Personnel Management (OPM) "2018 General Schedule" which excludes local
- <sup>c</sup> We have assumed that there will be no new sources during the three-year period of this ICR.
- <sup>d</sup> We have assumed that 46 facilities are fitted with CMS control, and an additional 30 facilities that may encounter excess
- <sup>e</sup> We have assumed that 20 percent of 152 major sources (30 facilities) will be required to submit periodic startup, shutdown, and malfunction reports.
- <sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

(D)	(E)	(F)	(G)	(H)
Plants per year a	Technical person- hours per year	Management person-hours per year	Clerical person-hours per year	Cost, \$ <sup>b</sup>
	(E=CxD)	(Ex0.05)	(Ex0.1)	
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
76	304	15.2	30.4	\$16,620.74
30	60	3	6	\$3,280.41
	<b>419</b>			<b>\$20,000</b>

Technical	48.75
Managerial	65.71
Clerical	26.38

52 are major sources, and 200 are area sources. There will be no additional new sources over the three-year period of this project. Estimated overhead expenses: \$65.71 for Managerial, \$48.75 for Technical, and \$26.38 for Clerical. Hourly wage rates and fringe benefits rates of pay.

CO<sub>2</sub> emissions.  
 Annual, malfunction report.

ICR.

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents <sup>1</sup>	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	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



<b>Total Annual Responses</b>				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	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
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