| Burden Item | A<br>Technical person-hours per occurrence | B<br>No. of occurrences per respondent per year | C<br>Technical person-hours per respondent per year<br>(AxB) | D<br>Respondents per year [a] |
|---|---|---|---|---|
| 1. Applications | N/A | | | |
| 2. Survey and Studies | N/A | | | |
| 3. Reporting Requirements | | | | |
| A. Familiarize with rule requirement [c] | 1 | 1 | 1 | 41 |
| B. Required Activities | | | | |
| New Sources | | | | |
| Initial performance test [d] | 280 | 1 | 280 | 0.33 |
| Repeat performance test [d, e] | 280 | 0.2 | 56 | 0.33 |
| C. Create Information | See 3B | | | |
| D. Gather Existing Information | See 3B | | | |
| E. Write Report | | | | |
| New Sources | | | | |
| Notification of construction/reconstruction [f] | 2 | 1 | 2 | 0.33 |
| Notification of initial performance test [e, g] | 2 | 1.2 | 2.4 | 0.33 |
| Report of initial performance test | See 3B | | | |
| Existing Sources | | | | |
| Semiannual report [h] | 4 | 2 | 8 | 41 |
| **Subtotal for Reporting Requirements** | | | | |
| 4. Recordkeeping Requirements | | | | |
| A. Familiarize with rule requirement | See 3A | | | |
| B. Plan Activities | See 3B | | | |
| C. Implement Activities | See 3B | | | |
| D. Develop Record System | N/A | | | |
| E. Time to Enter Information | | | | |
| Records of startup, shutdown, and malfunctions [i] | 1.5 | 2 | 3 | 41 |
| Records of VOC, temperature, and CMS maintenanc | 0.25 | 52 | 13 | 41 |
| F. Audits | N/A | | | |
| **Subtotal for Recordkeeping Requirements** | | | | |
| **TOTAL LABOR BURDEN AND COSTS (rounded) [k]** | | | | |
| **TOTAL CAPITAL AND O&M COST (rounded) [k]** | | | | |
| **GRAND TOTAL [k]** | | | | |

Assumptions:

[a]  We estimate that there are an average of 41 existing respondents, and it is estimated that one additional source will bec

~~This ICR uses the following labor rates: $51.03 for technical, $91.41 for managerial, and $35.82 for clerical labor.~~ of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by occupational and industry group."  The r

~~The number shown in items addressed 1.42 occurrences per respondent for the burdens financing are available on the annual add-on inc~~

[c]  We estimate it will take one hour to read and familiarize with the rule. This burden item applies to all sources.

[d]  We estimate each performance test will take 280 hours to complete.

[e]  We estimate 20 percent of respondents will need to repeat the initial performance test.

[f]  We estimate it will take 2 hours to prepare the notification of construction/reconstruction.

g. We estimate it will take 2 hours to prepare the notification of initial performance test.

h. We estimate it will take 4 hours to compile data for semiannual reports.

i. We estimate it will take 1.5 hours to record startups, shutdowns, and malfunctions.

j. We estimate it will take 0.25 hours to record VOCs, temperatures, and CMS maintenance.

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

| | 117.92 | 147.4 | 57.02 | |
| --- | --- | --- | --- | --- |
| | **E** | **F** | **G** | **H** |
| | Technical hours per year | Management hours per year | Clerical hours per year | Total cost per year |
| | (CxD) | (Ex0.05) | (Ex0.10) | ($) [b] |
| | | | | |
| | | | | |
| | | | | |
| | 41 | 2.05 | 4.10 | $5,370.67 |
| | | | | |
| | | | | |
| | 92.4 | 4.62 | 9.24 | $12,103.66 |
| | 18.48 | 0.92 | 1.85 | $2,420.73 |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | 0.66 | 0.03 | 0.07 | $86.45 |
| | 0.792 | 0.04 | 0.08 | $103.75 |
| | | | | |
| | | | | |
| | 328 | 16 | 33 | $42,965.38 |
| | **554** | | | **$63,050.64** |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | 123 | 6.15 | 12.30 | $16,112.02 |
| | 533 | 26.65 | 53.30 | $69,818.74 |
| | | | | |
| | **754** | | | **$85,930.75** |
| | **1,310** | | | **$149,000** |
| | | | | **$376,000** |
| | | | | **$525,000** |

New Sources 0.33
Existing Sources 41

**16 hr/response**

come subject over the next three years of this ICR.

ates are from column 1, "Total compensation."

**Table 2: Average Annual EPA Burden and Cost – NSPS for Flexible Vinyl and Urethane**

| Burden Item | A Person hours per occurrence | B No. of occurrences per respondent per year | C Person-hours per respondent per year | D Respondents per year [a] |
|---|---|---|---|---|
| | | | (C=AxB) | |
| Required Activities | | | | |
| New Sources | | | | |
| Initial performance tests [c] | 24 | 1 | 24 | 0.33 |
| Repeat performance tests [c, d] | 24 | 0.2 | 4.8 | 0.33 |
| Report Review | | | | |
| New Sources | | | | |
| Notification of construction/reconstruction [e] | 2 | 1 | 2 | 0.33 |
| Notification of initial startup [f] | 0.5 | 1 | 0.5 | 0.33 |
| Notification of actual startup [g] | 0.5 | 1 | 0.5 | 0.33 |
| Notification of initial test [d, h] | 0.5 | 1.2 | 0.6 | 0.33 |
| Review test results [d, i] | 0.5 | 1.2 | 0.6 | 0.33 |
| Existing Sources | | | | |
| Semiannual reports [j] | 2 | 2 | 4 | 41 |
| **TOTAL COST (rounded)[k]** | | | | |

Assumptions:

[a] We estimate that an average of 41 existing respondents, and it is estimated that one additional source will beco

[b] This ICR uses the following labor rates: $48.75 for technical, $65.71 for managerial, and $26.38 for clerical lab Management (OPM), 2018 General Schedule, which excludes locality rates of pay.  The rates have been increase packages available to government employees.

[c] We estimate it will take 24 hours to participate with each performance test.

[d] We estimate 20 percent of respondents will need to repeat the initial performance test.

[e] We estimate it will take 2 hours to review construction/reconstruction notifications.

[f] We estimate it will take 0.5 hours to review initial startup notifications.

[g] We estimate it will take 0.5 hours to review actual startup notifications.

[h] We estimate it will take 0.5 hours to review initial test notifications.

[i] We estimate it will take 0.5 hours to review test results.

[j] We estimate it will take 2 hours to review each semiannual report twice annually.

[k] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

# Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal)

|  | 48.75 | 65.71 | 26.38 |  |
| --- | --- | --- | --- |
| **E** | **F** | **G** | **H** |
| **Technical person hours per year** | **Management person-hours per year** | **Clerical person-hours per year** | **Total cost per year** |
| **(CxD)** | **(Ex0.05)** | **(Ex0.10)** | **($)** [b] |
|  |  |  |  |
|  |  |  |  |
| 7.92 | 0.40 | 0.79 | $433.01 |
| 1.58 | 0.08 | 0.16 | $86.60 |
|  |  |  |  |
|  |  |  |  |
| 0.66 | 0.03 | 0.07 | $36.08 |
| 0.17 | 0.01 | 0.02 | $9.02 |
| 0.17 | 0.01 | 0.02 | $9.02 |
| 0.20 | 0.01 | 0.02 | $10.83 |
| 0.20 | 0.01 | 0.02 | $10.83 |
|  |  |  |  |
| 164 | 8.20 | 16.40 | $8,966.45 |
| **201** |  |  | **$9,560** |

me subject over the next three years of  this ICR.

or.  These rates are from the Office of Personnel
d by 60 percent to account for the benefit

## Capital/Startup vs. Operation and Maintenance (O&M) Costs

| (A)<br>Continuous<br>Monitoring<br>Device | (B)<br>Capital/Startup<br>Cost for One<br>Respondent | (C)<br>Number of<br>New<br>Respondents | (D)<br>Total<br>Capital/Startup<br>Cost, (B X C) | (E)<br>Annual O&M<br>Costs for One<br>Respondent | (F)<br>Number of<br>Respondents<br>with O&M |
|---|---|---|---|---|---|
| Temperature or feed rate monitor | $20,000 | 0.33 | $6,600 | $9,000 | 41 |

|  |
| --- |
| (G) |
| Total O&M, |
| (E X F) |
| |
| $369,000 |

$376,000