Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
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	Number of Respondents (E=A+B+C-D)
1	1	168	0	0	169
2	1	169	0	0	170
3	1	170	0	0	171
Average	1	169	0	0	**170**

[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 Response	
17600	# hours
388	# responses
45	hr/resp

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(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 [a]	Total O&M, (E X F)
Initial performance test (inlet/outlet)	$28,000	1	$28,000			
Continuous monitoring system (CMS)	$10,000	1	$10,000	$25	84	$2,100
Repeat performance test (inlet/outlet)	$28,000	65	$1,820,000			
Continuous emission monitoring system (CEMS)	$183,500	1	$183,500	$26,700	4	$106,800
Total cost (rounded) [b]			**$2,040,000**			**$109,000**

[a] We estimate an average of 170 sources during the three-year period of this ICR. Permit data indicates 52% of the facilities use add-on controls (79 use oxidizers and 9 use carbon adsorption). All of the oxidizers use parametric monitoring, and it was assumed that 5 of the facilities using carbon adsorption do as well. The remaining 4 facilities using carbon adsorption were assumed to use CEMs. It was conservatively estimated that each new facility uses CEMs.

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

Respondents with add-on controls

Year	Existing	New	Total
1	88	1	89
2	89	1	90
3	90	1	91
average	89	1	90

We have assumed that 5% of respondents will fail to meet standards each year

170	5%	8.5

Total Annual Responses				
(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
Initial Notification	1	1	0	1
Notification of performance test	1	1	0	1
Notification of compliance status	1	1	0	1
~~Work Practices Plans for Affiliated Operations and Direct-fired dryers/ovens~~	~~0~~	~~0~~	~~0~~	~~0~~
Performance test reports	1	1	0	1
Periodic Testing of Oxidizers	22	1	0	22
CMS Performance Evaluation	22	1	0	22
Semiannual report	170	2	0	340
			Total	**388**

Note: Based on permits we assume that 88 facilites use add-on controls, with a total of 123 oxidizers and 18 carbon adsorbers. Some permits already require periodic testing. It's estimated that an additional 65 oxidizers will have to perform repeat testing under the proposal, and that one-third are done each year (65/3=22)

22

$2,149,000 total annual cost (capital and O&M)

88

$789,000.00 total annual average cost (capital and O&M)

Table 1: Annual Respondent Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Renewal)

				1355.5	$117.92	$147.40	$57.02	
	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(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)	(H) Cost, $ [b]
1. Reporting requirements								
A. Familiarization with regulatory requirements	8	1	8	170	1,360	68	136	$178,142
B. Gather information [c]	4	4	16	1	16	0.8	1.6	$2,096
C. Periodic performance testing [d]								
i. Prepare for periodic performance test	24	1	24	22	528	26	53	$69,161
ii. Attend periodic performance test	10	2	20	22	440	22	44	$57,634
D. Write reports								
i. Initial notification [c]	2	1	2	1	2	0.1	0.2	$262
ii. Notification of performance test [c]	2	1	2	1	2	0.1	0.2	$262
iii. Notification of compliance status [c]	2	1	2	1	2	0.1	0.2	$262
iv. Performance test reports [c]	2	1	2	1	2	0.1	0.2	$262
v. Notification of CMS performance evaluation[d]	2	1	2	22	44	2.2	4.4	$5,763
vi. Semiannual summary report	4	2	8	170	1,360	68	136	$178,142
Subtotal for Reporting Requirements						***4,319***		***$491,985***
2. Recordkeeping requirements								
A. Read instructions [c]	4	1	4	1	4	0.2	0.4	$524
B. Plan activities [c]	15	1	15	1	15	0.75	1.5	$1,965
C. Implement activities for compliance coating use [e, f]	5	12	60	80	4,800	240	480	$628,735
D. Implement activities for control devices and process equipment [c]								
i. Design analysis	12	1	12	1	12	0.6	1.2	$1,572
ii. Performance test oversight	20	1	20	1	20	1	2	$2,620
E. Develop record system								
i. Develop plan for material used [e]	10	1	10	80	800	40	80	$104,789
ii. Control equipment and maintenance plan [c]	10	1	10	1	10	0.5	1	$1,310
F. Time to enter information								
i. Compliance calculation [e]	2	12	24	80	1,920	96	192	$251,494
ii. Control equipment testing [f]	1	1	1	90	90	4.5	9	$11,789
iii. Records of failures to meet standards/actions taken to minimize emissions [g]	2	12	24	8.5	204	10.2	20.4	$26,721
G. Time to train personnel								
i. Acquisition and installation [c]	15	1	15	1	15	0.75	1.5	$1,965
ii. Equipment inspection and monitoring [f]	10	1	10	90	900	45	90	$117,888
iii. Use of technology and systems	10	1	10	170	1,700	85	170	$222,677
H. Store, file and maintain records [h]	0.25	12	3	170	510	25.5	51	$66,803
I. Retrieve records/reports [h]	0.25	12	3	170	510	25.5	51	$66,803
Subtotal for Recordkeeping Requirements						***13,237***		***$1,507,654***
TOTAL LABOR BURDEN AND COST (rounded) [i]						***17,600***		***$2,000,000***
TOTAL CAPITAL AND O&M COST (rounded) [i]								***$789,000***
GRAND TOTAL COST (rounded) [i]								***$2,789,000***

Last ICR	
Hours	**Cost**
13,800	**1,380,000**
	1,010,000
	2,390,000

Assumptions:

a We have assumed that the average number of respondents that will be subject to this rule will be 170. There are currently 168 facilities, and we have estimated there will be three additional new sources that will become subject to the rule over the three-year period of the ICR (i.e., one 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 Technical labor, and $57.02 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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 this is a one-time activity for one new facility using a solvent recovery device.

d Periodic testing will be required for an additional 65 oxidizers, assume one-third each year (65/3 = 22 per year)

e Based on permit data, we have assumed that 80 facilities comply with MACT through the use of compliant coatings and thus will record activities for compliance coating use.

f Based on review of permit data we have estimated that 88 facilities currently use add on control equipment. Assuming each new facility added uses add-on control equipment, we assumed an average of 90 facilities per year with add on controls over the 3 year period. Thus, we have assumed these 90 facilties incur these costs.

g We have assumed that 5% of respondents will fail to meet standards each year (0.05x170 = 8.5)

h We have assumed that 170 respondents will be involved in the storage, filing, maintenance and retrieval of records and reports twelve times per year.

i 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 Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Proposed amendments)

					48.75	65.71	26.38			
Burden item	**(A) Person hours per occurrence**	**(B) No. of occurrences per respondent per year**	**(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)**	**(H) Cost, $ [b]**		
1. Review initial notification [c]	8	1	8	1	8	0.4	0.8	$437		
2. Review notification of compliance status [c]	10	1	10	1	10	0.5	1	$547		
3. Review semiannual summary reports [d]	15	2	30	170	5,100	255	510	$278,835		
4. Review notification of initial performance test [c]	2	1	2	1	2	0.1	0.2	$109	**Last ICR**	
5. Review notification of periodic performance test and CMS performance evaluation [e]	4	1	4	22	88	4.4	8.8	$4,811		
6. Review initial test results [c, g]	10	1	10	1	10	0.5	1	$547	**Hours**	**Cost**
7. Review periodic performance test and CMS performance evaluation results [e,f]	10	1	10	22	220	11	22	$12,028		
TOTAL ANNUAL BURDEN AND COST (rounded) [g]						**6,300**		**$297,000**	**9,080**	**413,000**

Assumptions:

[a] We have assumed that the average number of respondents that will be subject to this rule will be 170. There are currently 168, and it's estimated that 3 additional new sources that will become subject to the rule over the 3-year period of the ICR (i.e., 1 per year).

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: $65.71 for Managerial (GS-13, Step 5), $48.75 for Technical (GS-12, Step 1), and $26.38 Clerical (GS-6, Step 3). These rates are from the Office of Personnel Management (OPM) "2018 General Schedule" which excludes locality rates of pay.

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

[d] It is assumed that the agency will review summary reports twice per year.

[e] A total of 65 oxidizers will have periodic performance tests and CMS performance evaluations. Assume one-third per year (65/3 = 22)

[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.