

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal),
EPA ICR Number 0657.13, OMB Control Number 2060-0105.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for (40 CFR Part 60, Subpart QQ) for the Graphic Arts Industry were proposed on October 28, 1980; promulgated on November 8, 1982; and most-recently amended on April 9, 2004. These regulations apply to each publication rotogravure printing press (not including proof presses) commencing construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 60, Subpart QQ.

In general, all NSPS 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 NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain the file for at least two years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional offices.

The “Affected Public” are owners or operators of publication rotogravure printing presses. The ‘burden’ to the Affected Public may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal). The ‘burden’ to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found at the end of this document in Table 2: Average Annual EPA Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal). There are approximately 22.33 publication rotogravure printing press facilities subject to the regulation. None of the facilities in the United States are owned by state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. 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 22 existing respondents per year will be subject to the standard, and 0.33 additional new respondents per year will become subject to these standards (one new respondent over the three-year period of this ICR). The number of respondents has been updated from the prior ICR based on the estimated growth rate, as EPA identified no additional changes to industry growth or decline through consultations, public comment, or internal Agency knowledge. The estimated growth rate assumptions have also been retained for the three-year period of this ICR. This ICR assumes 30 percent of the 22 existing facilities will either add or modify operations over the three-year period of this ICR, yielding an average of an additional 2.2 existing facilities per year ($22 * 0.3 / 3 = 2.2$) that will also become subject to the initial reporting requirements. The overall average number of respondents for this ICR is 22.33 per year.

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 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

... application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years.

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, volatile organic compound (VOC) emissions from publication rotogravure printing presses either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart QQ.

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 these emission standards. Continuous emission monitors are used to ensure compliance with these same standards at all times.

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 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 60, Subpart QQ.

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* (84 FR 19777) on May 6, 2019. No comments were received on the burden published in the *Federal Register* for this renewal.

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 22.33 respondents will be subject to these standards over the three-year period covered by this ICR. The number of respondents has been updated based on the estimated growth rate from the prior 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 and that these standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Graphic Arts Association, at (215) 396-2300, and the Printing Industries of America, at (412) 741-6860.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as to those submitted in response to the first *Federal Register* notice. In this case, the President of the Graphic Arts Association provided the following comments: (1) the total labor burden hours to comply with subpart QQ appear low and should be closer to 2,100 hours; (2) the labor rates used should be updated to more current rates; (3) costs should include costs of outside consultation; and (4) the performance testing costs do not appear to include testing analysis. The commenter provided an estimate of "stack" testing costs of \$20,000 to \$25,000.

The commenter did not provide recommendations for adjustments to the hours required for specific activities, therefore, we have not adjusted the total labor burden hours. We agree that the labor rates should be adjusted and have updated the rates as provided in section 6(b) of this document. We also agree that facilities may require outside technical consultation and have accordingly increased the technical labor hours associated with "familiarization with the regulatory requirements" from 1 to 3 hours to include costs associated with consultations. Regarding testing costs, we have retained the currently hourly estimates (60 hours) for completion of initial and repeat performance tests in Table 1. Section 60.433 provides performance testing requirements, which are not emissions stack tests, but sampling of VOC and water content of raw inks and coatings and monitoring of solvent recovered. We have not included separate costs for testing and sampling analysis beyond labor costs, because these activities are generally performed within facilities and the equipment used by the respondent is

the same equipment used in their day-to-day operations to maintain quality control over the surface coating produced for sale. We do not have sufficient data (e.g., number of inks/coatings that would require Method 24A analysis per facility) to develop further testing and analysis costs. Further, 40 CFR Part 60, Subpart QQ allows facilities to use manufacturers' supplied formulation data to determine the VOC and water content of inks and related coatings, based on coating formulation, in lieu of sampling analysis. Therefore, the cost of these analyses may be avoided.

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 that 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

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

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 owners and operators of publication rotogravure printing presses. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2754 which corresponds to the North American Industry Classification System (NAICS) 323111 for Commercial Printing, except Screen and Books.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ).

A source must make the following reports:

Notifications	
Notification of construction/reconstruction	§60.7(a)(1)
Notification of actual startup	§60.7(a)(3)
Report of initial performance test results	§60.8(a), §60.433 (e) (6)
Notification of initial performance test	§60.8(d)
Notification of physical or operational change	§60.7(a)(4)

Reports	
Semiannual Reports	§60.7(c)

A source must keep the following records:

Recordkeeping	
Records of startups, shutdowns, malfunctions	§60.7(b)
Records necessary to determine conditions of the performance test	§60.7(f), §60.8(c), §60.433(a)(5)
Records showing information to make monthly calculations of emissions	§60.7(f), §60.434(a)
Records are required to be retained for two years.	§60.7(f), §60.434(a)

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.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Perform initial performance test, Reference Method 24A test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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:

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

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 standards and note the operating conditions under which compliance was achieved. 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. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. The 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 two years.

5(c) Small Entity Flexibility

There are no small entities (i.e., small businesses) affected by this regulation.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized 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.

The Agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 2,060 hours (Total Labor Hours from Table 1 at the end of this document). These hours are based on Agency studies and background documents from the development of the regulations, Agency knowledge and experience with the NSPS 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	\$141.06 (\$67.17+ 110%)
Technical	\$120.27 (\$57.27 + 110%)
Clerical	\$58.67 (\$27.94 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, “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 only costs to the regulated industry resulting from information collection activities required by the subject standard(s) are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup and/or operation and maintenance costs, because the equipment used by the respondent is the same equipment used in their day-to-day operations to maintain quality control over the surface coating produced for sale. Further, there are no costs associated with performance testing analysis. Because 40 CFR Part 60, Subpart QQ allows facilities to use manufacturers’ supplied formulation data to determine the VOC and water content of inks and related coatings, based on coating formulation, the cost of these analyses would be avoided.

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 such activities 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 \$9,970.

This cost is based on the average hourly labor rate as follows:

Managerial	\$66.62 (GS-13, Step 5, \$41.64 + 60%)
Technical	\$49.44 (GS-12, Step 1, \$30.90 + 60%)
Clerical	\$26.75 (GS-6, Step 3, \$16.72 + 60%)

These rates are from the Office of Personnel Management (OPM), 2019 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 at the end of this document in Table 2: Average Annual EPA Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (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 22 existing respondents will be subject to these standards. It is estimated that an additional 0.33 respondents per year will become subject to these same standards. Also, this ICR assumes 30 percent of the 22 existing facilities will add or modify operations over the 3-year period of this ICR, yielding an average of 2.2 existing facilities per year ($22 \times 0.3 / 3 = 2.2$) that also will become subject to initial reporting requirements. The overall average number of respondents, as shown in the table below, is 22.33 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 ^{a, b}	(B) Number of Existing Respondents ^c	(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	2.53	21.66	0	2.2	22
2	2.53	22	0	2.2	22.33
3	2.53	22.33	0	2.2	22.66
Average	2.53	22	0	2.2	22.33

^a New respondents include sources with constructed, reconstructed and modified affected facilities.

^b Over the 3-year ICR period, we have assumed that 30 percent of 22 existing respondents will modify operations ($22 \times 30\% = 6.6$) and that 1 new facility will come on-line. The three-year average is 2.53 per year ($(6.6 + 1) / 3 = 2.53$).

^c Estimates of the number of existing sources, new sources, and existing sources that modify operations are based on the previous ICR (0657.12)

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 22.33.

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 construction/reconstruction	2.53	1	0	2.53
Notification of actual startup	2.53	1	0	2.53
Notification of initial performance test	2.53	1	0	2.53
Initial performance test report	2.53	1	0	2.53
Semiannual reports	22.33	2	0	44.66
			Total	55 (rounded)

The number of Total Annual Responses is 55 (rounded).

The total annual labor costs are \$238,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for both the respondents and the Agency are shown in Tables 1 and 2 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 2,060 hours. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (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 37 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. 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 207 labor hours at a cost of \$9,970; see below in Table 2: Average Annual EPA Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (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 an increase in burden from the most-recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The increase in burden from the most-recently approved ICR is due to an increase in the number of Respondents subject to this rule. The estimated number of existing Respondents has increased from 21 in the previous ICR to 22 in this ICR, with an attendant increase in labor hours. The estimated number of new sources becoming subject to the rule remains at an average of one per three-year period. Wage rates for both respondents and Agency personnel have been updated. Labor rates for respondents have been updated to “total compensation” rates in the United States Department of Labor, Bureau of Labor Statistics, June 2019, “Table 2. Civilian Workers, by occupational and industry group.” Labor rates for Agency personnel have been updated to the rates from the Office of Personnel Management (OPM), 2019 General Schedule. The regulations have not changed over the past three years and are not anticipated to change over the next three years.

One revision was made to the calculation of respondent burden. The labor burden for facilities to familiarize with regulation requirements was revised from 1 hour per source per year to 3 hours per source per year. This change was made in response to industry comments that facilities may require outside technical consultation and require more than 1 hour to familiarize and re-familiarize with the rule.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 37 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.

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-2013-0302. 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), WJC 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-2013-0302 and OMB Control Number 2060-0105 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 1: Annual Respondent Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal)

Burden Item	(A) Technical person- hours per occurrenc e	(B) No. of occurrences per respondent per year	(C) Technical person- hours per responden t per year (C=AxB)	(D) Respondents per year ^a	(E) Technical hours per year (E=CxD)	(F) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.1)	(H) Total cost per year (\$) _b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements ^c	3	1	3	22.33	67.0	3.35	6.70	\$8,922.24
B. Required activities								
Initial performance test ^d	60	1	60	2.53	152	7.59	15.2	\$20,218.24
Repeat of performance test ^{d,e}	60	1	60	0.51	30.4	1.52	3.04	\$4,043.65
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Notification of construction, reconstruction, or modification ^d	2	1	2	2.53	5.06	0.25	0.51	\$673.94
Notification of actual startup ^d	2	1	2	2.53	5.06	0.25	0.51	\$673.94
Notification of initial performance test ^d	2	1	2	2.53	5.06	0.25	0.51	\$673.94
Report of performance test	See 3B							
Semiannual report ^f	8	2	16	22.33	357	17.9	35.7	\$47,585.27
Subtotal for reporting Requirements					715			\$82,791
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements ^c	See 3A							

B. Plan activities	See 4C							
C. Implement activities	See 3B							
D. Develop record system ^g	3	1	3	0.33	0.99	0.05	0.10	\$131.86
E. Time to enter information								
Records of startups, shutdowns, malfunctions, etc. ^h	0.2	4.28	0.86	22.33	19.1	0.96	1.91	\$2,545.81
Records of VOC for monthly materials and emissions calculation ⁱ	1	51.36	51.36	22.33	1,147	57.3	115	\$152,748.72
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						1,342		\$155,426
TOTAL LABOR BURDEN AND COSTS (rounded) ^j						2,060		\$238,000
TOTAL CAPITAL AND O&M COSTS (rounded) ^j								\$0
GRAND TOTAL (rounded) ^j								\$238,000

Assumptions:

^a We have assumed there is an average of 22 existing respondents per year subject to the rule. We have also assumed that over the 3-year ICR period, 30 percent of existing respondents will modify operations ($22 \times 30\% = 6.6$) and that 1 new facility will come on-line. The three-year average is 2.53 new sources per year ($(6.6 + 1)/3 = 2.53$). The overall average number of sources per year subject to the rule is 22.33 ($22 \text{ existing sources} + (1 \text{ new source}/3 \text{ yr}) = 22.33$).

^b This ICR uses the following labor rates: \$120.27 for technical, \$141.06 for managerial, and \$58.67 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "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 all new and existing sources will have to familiarize with the regulatory requirements each year. This requirement has been increased in order to allow facilities ample time to familiarize with the regulatory requirements. This includes the costs associated with obtaining a technical consultant.

^d Costs are covered in Section 6(b)(iii) of the supporting statement. The number of respondents is covered in Section 6(d) of the supporting statement.

^e We assume that 20% of new or modified sources will need to repeat the performance test.

^f We have assumed all respondents will submit semiannual reports.

^g We have assumed one new facility will become subject to the standard over the next three years. Therefore, there will be an average of 0.33 new respondents per year over the active life of this ICR.

^h We have assumed there are 22 existing respondents with an average of 4 presses per facility ($22 \times 4 = 88$), plus 6.6 modified presses, and 1 press at the new respondent facility, for a total of 95.6 presses that are subject to the rule. The number of occurrences per respondent per year is 4.28 ($95.6/22.33 = 4.28$).

ⁱ We estimate the number of occurrences per respondent per year to be 51.36 ($4.28 \times 12 = 51.36$).

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

Table 2: Average Annual EPA Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal)

Burden Item	(A) Technical person-hours per occurrence ^e	(B) No. of occurrences per respondent per year	(C) Technical person-hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical hours per year (E=CxD)	(F) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.1)	(H) Total cost per year (\$) ^b
1. Review Reports								
Initial performance test ^c	24	1	24	2.53	60.72	3.04	6.07	\$3,366.68
Repeat performance test ^d	24	1	24	0.51	12.144	0.61	1.21	\$673.34
Report review								
Notification of construction, reconstruction, or modification ^c	2	1	2	2.53	5.06	0.25	0.51	\$280.56
Notification of actual startup ^c	0.5	1	0.5	2.53	1.27	0.06	0.13	\$70.14
Notification of initial performance test ^c	0.5	1	0.5	2.53	1.27	0.06	0.13	\$70.14
Report of performance test ^c	4	1	4	2.53	10.12	0.51	1.01	\$561.11
Semiannual report ^e	2	2	4	22.33	89.3184	4.47	8.93	\$4,952.35
TOTAL COST (rounded)^f					207			\$9,970

Assumptions:

^a We have assumed there is an average of 22 existing respondents per year subject to the rule. We have also assumed that over the 3-year ICR period, 30 percent of existing respondents will modify operations (22*30% = 6.6) and that 1 new facility will come on-line. The three-year average is 2.53 new sources per year ((6.6 + 1)/3 = 2.53). The overall average number of sources per year subject to the rule is 22.33 (22 existing sources + (1 new source/3 yr) = 22.33).

^b This ICR uses the following labor rates: \$49.44 for technical, \$66.62 for managerial, and \$26.75 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

^c Assumes oversight of initial performance test. This is a one-time only activity for newly constructed, and reconstructed or modified sources.

^d Assumes oversight of initial performance test. We have assumed 20 percent of respondents will have to repeat the performance test due to failure ($2.53 * 0.2 = 0.51$).

^e We have assumed all respondents will submit semiannual reports.

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