

Table 1: Annual Respondent Burden and Cost – NSPS for the Graphic Arts Industry (40 C

Burden Item	(A) Technical person- hours per occurrence	(B) No. of occurrences per respondent per year
1. Applications	N/A	
2. Surveys and studies	N/A	
3. Reporting requirements		
A. Familiarize with regulatory requirements ^c	3	1
B. Required activities		
Initial performance test ^d	60	1
Repeat of performance test ^{d,e}	60	1
C. Create information	See 3B	
D. Gather existing information	See 3B	
E. Write report		
Notification of construction, reconstruction, or modification ^d	2	1
Notification of actual startup ^d	2	1
Notification of initial performance test ^d	2	1
Report of performance test	See 3B	
Semiannual report ^f	8	2
Subtotal for reporting Requirements		
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
E. Time to enter information		
Records of startups, shutdowns, malfunctions, etc. ^h	0.2	4.28
Records of VOC for monthly materials and emissions calculation ⁱ	1	51.36
F. Time to train personnel	N/A	
G. Time for audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COSTS (rounded) ^j		
TOTAL CAPITAL AND O&M COSTS (rounded) ^j		
GRAND TOTAL (rounded) ^j		

Assumptions:

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

^b This ICR uses the following labor rates: \$120.27 for technical, \$141.06 for managerial, and \$58.67 for clerical lab Statistics, June 2019, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 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 familiarize with the regulatory requirements. This includes the costs associated with obtaining a technical consultan

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

^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

^h We have assumed there are 22 existing respondents with an average of 4 presses per facility ($22 \times 4 = 88$), plus 6.6 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.

CFR Part 60, Subpart QQ) (Renewal)

(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
3	22.33	67.0	3.35	6.70	\$8,922.24
60	2.53	152	7.59	15.2	\$20,218.24
60	0.51	30.4	1.52	3.04	\$4,043.65
2	2.53	5.06	0.25	0.51	\$673.94
2	2.53	5.06	0.25	0.51	\$673.94
2	2.53	5.06	0.25	0.51	\$673.94
16	22.33	357	17.9	35.7	\$47,585.27
		715			\$82,791
3	0.33	0.99	0.05	0.10	\$131.86
0.86	22.33	19.1	0.96	1.91	\$2,545.81
51.36	22.33	1,147	57.3	115	\$152,748.72
		1,342			\$155,426
		2,060			\$238,000
					\$0
					\$238,000

2019 Labor
Technical
Management
Clerical

responses

^d that over the 3-year ICR period, 30 percent of existing respondents will modify per year ((6.6 + 1)/3 = 2.53). The overall average number of sources per year subject to

ior. These rates are from the United States Department of Labor, Bureau of Labor
1, "Total compensation." The rates have been increased by 110 percent to account

: This requirement has been increased in order to allow facilities ample time to
t.

n 6(d) of the supporting statement.

will be an average of 0.33 new respondents per year over the active life of this ICR.

modified presses, and 1 press at the new respondent facility, for a total of 95.6

r Rates
\$120.27
\$141.06
\$58.67

hr/response

37

Table 2: Average Annual EPA Burden and Cost – NSPS for the Graphic Arts Industry (40 C

Burden Item	(A) Technical person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical person- hours per respondent per year (C=AxB)	(D) Respondents per year ^a
1. Review Reports				
Initial performance test ^c	24	1	24	2.53
Repeat performance test ^d	24	1	24	0.51
Report review				
Notification of construction, reconstruction, or modification ^c	2	1	2	2.53
Notification of actual startup ^c	0.5	1	0.5	2.53
Notification of initial performance test ^c	0.5	1	0.5	2.53
Report of performance test ^c	4	1	4	2.53
Semiannual report ^e	2	2	4	22.33
TOTAL COST (rounded) ^f				

Assumptions:

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

^b This ICR uses the following labor rates: \$49.44 for technical, \$66.62 for managerial, and \$26.75 for clerical labor. Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 1.5 percent to reflect the 2019 locality pay schedule available to government employees.

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

^d Assumes oversight of initial performance test. We have assumed 20 percent of respondents will have to repeat the performance test.

^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.

CFR Part 60, Subpart QQ (Renewal)

(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
60.72	3.04	6.07	\$3,366.68
12.144	0.61	1.21	\$673.34
5.06	0.25	0.51	\$280.56
1.27	0.06	0.13	\$70.14
1.27	0.06	0.13	\$70.14
10.12	0.51	1.01	\$561.11
89.3184	4.47	8.93	\$4,952.35
207			\$9,970

Labor Rates	
Technical	\$49.44
Management	\$66.62
Clerical	\$26.75

that over the 3-year ICR period, 30 percent of : average is 2.53 new sources per year ((6.6 + 1)/3 rce/3 yr) = 22.33).

These rates are from the Office of Personnel 60 percent to account for the benefit packages

ted or modified sources.

erformance test due to failure (2.53*0.2 = 0.51).

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, 2}	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	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

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

² Over the 3-year period of this ICR, we have assumed that 30 percent of the 22 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 per year ((6.6 + 1)/3 = 2.53).

54.78984 (total responses)