

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Renewal), EPA ICR Number 1951.10, OMB Control Number 2060-0511.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) were proposed on September 13, 2000; promulgated on December 4, 2002; and amended on: 1) July 9, 2020, at 85 FR 41276; and 2) November 19, 2020, at 85 FR 73854¹. These regulations apply to existing facilities and new paper and to other web coating facilities, including web coating lines engaged in the coating of metal webs used in flexible packaging, and web coating lines engaged in the coating of fabric substrates for use in pressure sensitive tape and abrasive materials. New facilities include those that either commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart JJJJ.

In general, all NESHAP 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 NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain this file for at least five years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. If there is no such delegated authority, the EPA regional office can review them. All other reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the EPA regional offices. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority, such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

¹ The most recent amendments at 85 FR 41276 include: amendments to address emissions during periods of startup, shutdown, and malfunction (SSM), address emissions during SSM events, add a compliance demonstration equation that accounts for retained volatiles in the coated web, add repeat testing and electronic reporting requirements, and make technical and editorial changes. The most recent amendments at 85 FR 73854 include notification and recordkeeping requirements that apply to sources choosing to reclassify to area source status and to sources that revert to major source status, including a requirement for electronic notification.

The “Affected Public” includes owners and operators of paper and other web coating facilities. The ‘burden’ to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Renewal). The ‘burden’ to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and can be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Renewal). All the paper and other web coating facilities in the United States are owned and operated by the paper and other web coating industries. None of the facilities in the United States are owned by either state, local, tribal entities or the Federal government. They are privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, search of the National Emission Inventory (NEI), EPA’s Enforcement and Compliance History Online (ECHO) database (www.echo.epa.gov), and a review of active air emissions permits conducted for the July 9, 2020 RTR, we estimate that an average of 171 facilities are subject to the Paper and Other Web Coating NESHAP, 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 170 respondents per year will be subject to these standards, and one additional respondent per year will become subject to these same standards.

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 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to either new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reductions. 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, organic HAP emissions from paper and other web coating facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart JJJJ.

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. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the 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, leaks are being detected and repaired, 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.

Additionally, the EPA is requiring electronic reporting for certain notifications or reports. The EPA is requiring that owners or operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b), notifications of change in information required in 40 CFR 63.9(j), notifications of compliance status required in 40 CFR 63.9(h), performance test reports required in 40 CFR 63.10(d)(2), performance evaluations of CMS required in 40 CFR 63.3400(g), and semiannual reports required in 40 CFR 63.3400(c) through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For semiannual reports, EPA has developed a template for the reporting form in CEDRI specifically for 40 CFR Part 63, Subpart JJJJ. For the notifications required in 40 CFR 63.9(b), 63.9(h), and 63.9(j), owners and operators would be required to upload a PDF of the required notifications.

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests. The EPA is also requiring that 40 CFR Part

63, Subpart JJJJ performance test reports and performance evaluation reports must be submitted through the EPA's ERT.

3. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart JJJJ.

3(a) Non-duplication

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as for state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, 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 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* (86 FR 19256) on April 13, 2021. 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 171 respondents will be subject to these same standards over the three-year period covered by this 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 same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the National Paper Trade Association, at (312) 321-4092, and the American Coatings Association, at (202) 462-6272.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

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 record-keeping 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. These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to these standards. The EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. The EPA has found that the most-flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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 paper and other web coating facilities. The United States Standard Industrial Classification (SIC) codes for the

respondents affected by these standards and for the corresponding North American Industry Classification System (NAICS) codes are listed below:

Standard (40 CFR, Part 63, Subpart JJJJ)	SIC Codes	NAICS Codes
Corrugated and Solid Fiber Box Manufacturing	2653, 2679	322211
Folding Paperboard Box Manufacturing	2657	322212
Paper Bag and Coated and Treated Paper Manufacturing	2671, 2672, 2673, 2674, 2675	322220
All Other Converted Paper Product Manufacturing	2675, 2679	322299
Commercial Printing (Except Screen and Books)	2752, 2754, 2759, 2761, 2771, 2782	323111
Plastics Packaging Film and Sheet (including Laminated) Manufacturing	2671	326112
Unlaminated Plastics Film and Sheet (except Packaging) Manufacturing	3081	326113
Laminated Plastics Plate, Sheet (except packaging), and Shape Manufacturing	3083	326130
Abrasive Product Manufacturing	3291	327910
All Other Miscellaneous Fabricated Metal Product Manufacturing	3497	332999

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ).

A source must make the following reports:

Notifications	
Initial notifications (electronic submittal)	§63.9(b), §63.3400(b), §63.3400(h)
Notification of performance test	§63.7, §63.9(e), §63.3400(d)
Notification of compliance status (electronic submittal)	§63.9(h), §63.3400(e)
Initial notifications for an area source reclassifying to major source (electronic submittal)	§63.9(b)
Notification of change in information already provided for major source to area source reclassification (electronic submittal)	§63.9(j)

Reports	
Performance test report (electronic submittal)	§ 63.3400(f)
CMS performance evaluation report (electronic submittal)	§ 63.3400(g)
Semiannual compliance report (electronic submittal)	§ 63.3400(c)

A source must keep the following records:

Recordkeeping	
Records to demonstrate compliance	§63.10(b)(2), §63.3410(a)(1)
Records for each CMS	§63.3410(a)(2)
Records of all liquid-liquid material balances performed for solvent recovery systems	§63.3410(b)
Records of deviations from an operating limit	§63.3410(c)
Records for each annual catalyst activity test	§63.3410(d)
Records submitted electronically may be maintained in electronic format	§63.3410(e)
Records are required to be retained for five years	§63.10(b)(1)

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.

The rule was recently amended to include electronic reporting provisions on July 9, 2020 and November 19, 2020. Respondents are required to use the EPA's Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. Respondents are also required to submit electronic copies of notifications and certain reports through EPA's CEDRI. The notification is an upload of their currently required notification in portable document format (PDF) file. The semiannual reports are to be created using Form 5900-532, the electronic template included with this Supporting Statement. The template is an Excel spreadsheet which can be partially completed and saved for subsequent semiannual reports to limit some of the repetitive data entry. It reflects the reporting elements required by the rule and does not impose additional reporting elements. The OMB Control Number is displayed on the Welcome page of the template,

with a link to an online repository that contains the PRA requirements. For purposes of this ICR, it is assumed that there is no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for temperature for thermal/catalytic oxidizers.
Perform initial performance test, Reference Method Reference Methods 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 24, 25, 25A tests, and periodic emissions performance tests or annual catalyst testing, as 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

The EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

Agency Activities

Observe initial performance tests and repeat performance tests if necessary.
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 five years.

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

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 – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (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 17,300 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulations, Agency knowledge and experience with the NESHAP 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	\$153.55 (\$73.12 + 110%)
Technical	\$122.20 (\$58.19 + 110%)
Clerical	\$61.51 (\$29.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, “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 type of industry costs associated with the information collection activities in the subject standards are both labor costs (which are addressed elsewhere in this ICR) and the costs associated with continuous monitoring, performance testing, and other compliance activities. The capital/startup costs are one-time costs when a facility becomes subject to these regulations and include startup costs for CMS and the purchase of stack testing services. Capital costs also include the cost of periodic emissions performance testing of thermal oxidizers which are not already subject to periodic testing as a permit condition. The periodic emissions performance testing requirements in the amendments to the NESHAP require repeat testing every 5 years. For costing

purposes in this supporting statement, it has been conservatively assumed that all of the 62 thermal oxidizers subject to the requirement conduct their testing within the 3-year ICR period. The annual operation and maintenance costs are the ongoing costs to maintain the monitors.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents ^a	(D) Total Capital/ Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M ^b	(G) Total O&M, (E X F)
Initial performance test (inlet/outlet)	\$28,000	1	\$28,000			
Parametric/continuous monitoring system (CMS)	\$10,000	1	\$10,000	\$25	84	\$2,100
Continuous emission monitoring system (CEMS)	\$183,500	1	\$183,500	\$26,700	6	\$160,200
Repeat emissions performance test - Thermal Oxidizers	\$28,000	21	\$588,000			
Annual Catalyst Activity Testing - Catalytic Oxidizers				\$1,000	3	\$3,000
Totals (rounded) ^c			\$810,000			\$165,000

^a We estimate that one new facility using solvent recovery (carbon adsorption) and CEMs or CMS will be constructed each year. A facility using solvent recovery and CEMS or CMS requires initial testing. Thermal oxidizers require testing and 62 of the 123 thermal oxidizers do not already have a testing requirement in their permit. We assume 21 (62/3 = 21, rounded) thermal oxidizers will perform periodic testing every year.

^b We estimate an average of 171 sources (170 existing, 1 new) during the three-year period of this ICR. Permit data indicates that an average of 90 facilities use add-on controls (79 use oxidizers and 11 use carbon adsorption). All of the oxidizers use parametric monitoring (CMS), and it was assumed that 5 of the facilities using carbon adsorption do as well. The remaining 6 facilities using carbon adsorption were assumed to use CEMs. Three catalytic oxidizers do not already have a testing requirement in their permit and will comply by having the catalyst activity tested every year.

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

The total capital/startup costs for this ICR are \$810,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$165,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$975,000. These are the

recordkeeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The 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 \$313,000.

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

Managerial	\$69.04 (GS-13, Step 5, \$43.15 + 60%)
Technical	\$51.23 (GS-12, Step 1, \$32.02 + 60%)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 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 – Annual Respondent Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (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 170 existing respondents will be subject to these standards. It is estimated that one additional respondent per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 171 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) Number of Existing Respondents	(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	1	169	0	0	170
2	1	170	0	0	171
3	1	171	0	0	172
Average	1	170	0	0	171

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

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 171.

The total number of annual responses per year is calculated using the following table:

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents ^a	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
Performance test reports	1	1	0	1
CMS performance evaluation	1	1	0	1
Periodic Emissions Testing of Thermal Oxidizers	21	1	0	21
Annual Catalyst Testing of Catalytic Oxidizers	3	1	0	3
CMS Performance Evaluation ^b	21	1	0	21
Semiannual report	171	2	0	342
			Total	392

^a Based on permits examined for the recent final rule, we assume that an average of 90 facilities use add-on

controls, with a total of 123 oxidizers and 18 carbon adsorbers. Some permits already require periodic testing. We estimate that an additional 65 oxidizers (62 thermal oxidizers and 3 catalytic oxidizers) will have to perform repeat testing under the rule. We assume one-fifth of the thermal oxidizers are tested each year ($62/3 = 21$, rounded). Three additional catalytic oxidizers will have to perform annual catalyst testing, in lieu of emissions testing.

^b CMS performance is evaluated when a control device is tested. We assume 21 existing thermal oxidizers will be tested each year.

The number of Total Annual Responses is 392.

The total annual labor costs are \$2,050,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for 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 17,300 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (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 44 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$975,000. 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 6,270 labor hours at a cost of \$313,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (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 no significant change in ‘burden’ from the most-recently approved ICR. The change in burden from the most-recently approved ICR as currently identified in the OMB Inventory of Approved Burdens is due to an increase in the number of respondents subject to this rule. The rule was previously amended in 2020 on both July 9 and November 19. This ICR adjusts the burden to account for the growth rate within the industry following the July 9, 2020, final rule ICR. The rule is not anticipated to change over the next three years. The growth rate for this industry is low at one new source per year. Due to these adjustments, there is an overall increase in burden, although the rounded burden hours have not changed from the prior ICR. The capital/startup and operation and maintenance (O&M) costs have also been adjusted to account for growth. The overall result is an increase in costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 44 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-OAR-2021-0106. 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. Due to COVID-19 precautions, entry to the Reading Room is available by appointment

only. Please contact personnel in the Reading Room to schedule an appointment. 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-OAR-2021-0106 and OMB Control Number 2060-0511 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 – NESHAP for Paper and Other Web Coating (40 CFR Part 63, Subpart JJJJ) (Renewal).

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. Reporting requirements								
A. Familiarization with regulatory requirements	8	1	8	171	1,368	68	137	\$186,086.99
B. Gather information ^c	4	4	16	1	16	0.8	1.6	\$2,176.46
C. Initial performance testing (new sources) ^c								
i. Initial notification	2	1	2	1	2	0.1	0.2	\$272.06
ii. Notification of performance test	2	1	2	1	2	0.1	0.2	\$272.06
iii. Notification of compliance status	2	1	2	1	2	0.1	0.2	\$272.06
iv. Performance test report	2	1	2	1	2	0.1	0.2	\$272.06
v. CMS performance evaluation	2	1	2	1	2	0.1	0.2	\$272.06
D. Periodic performance testing ^d								
i. Notification of test - thermal oxidizers	24	1	24	21	504	25	50	\$68,558.36
ii. Attend test - thermal oxidizers	10	1	10	21	210	10.5	21	\$28,565.99
iii. CMS performance evaluation - thermal oxidizers	2	1	2	21	42	2.1	4.2	\$5,713.20
iv. Annual catalyst test - catalytic oxidizers	2	1	2	3	6	0.3	0.6	\$816.17
E. Write reports								
Semiannual summary report	4	2	8	171	1,368	68.4	136.8	\$186,086.99
Subtotal for Reporting Requirements						4,053		\$479,364
2. Recordkeeping requirements								
A. Read instructions ^c	4	1	4	1	4	0.2	0.4	\$544.11

B. Plan activities ^c	15	1	15	1	15	0.75	1.5	\$2,040.43
C. Implement activities for compliance coating use ^e	5	12	60	80	4,800	240	480	\$652,936.80
D. Implement activities for control devices and process equipment ^c								
i. Design analysis	12	1	12	1	12	0.6	1.2	\$1,632.34
ii. Performance test oversight	20	1	20	1	20	1	2	\$2,720.57
E. Develop record system								
ii. Develop plan for material used ^e	10	1	10	80	800	40	80	\$108,822.80
iii. Control equipment and maintenance plan ^c	10	1	10	1	10	0.5	1	\$1,360.29
F. Time to enter information								
i. Compliance calculation ^e	2	12	24	80	1,920	96	192	\$261,174.72
ii. Control equipment testing ^f	1	1	1	91	91	4.55	9.1	\$12,378.59
iii. Records of failures to meet standards/actions taken to minimize emissions ^g	2	12	24	9	216	10.8	21.6	\$29,382.16
G. Time to train personnel								
i. Acquisition and installation ^c	15	1	15	1	15	0.75	1.5	\$2,040.43
ii. Equipment inspection and monitoring ^f	10	1	10	91	910	45.5	91	\$123,785.94
iii. Use of technology and systems	10	1	10	171	1,710	85.5	171	\$232,608.74
H. Store, file and maintain records ^h	0.25	12	3	171	513	25.7	51.3	\$69,782.62
I. Retrieve records/reports ^h	0.25	12	3	171	513	25.7	51.3	\$69,782.62
Subtotal for Recordkeeping Requirements						13,281		\$1,570,993
Total Labor Burden and Costs (rounded) ⁱ						17,300		\$2,050,000
Total Capital and O&M Cost (rounded) ⁱ								\$975,000
GRAND TOTAL (rounded) ⁱ								\$3,030,000

Assumptions:

^a We assume that an average of 171 respondents (170 existing, 1 new) will be subject to this rule. We assume that one new source each year will become subject to the

rule over the three-year period of the ICR.

^b This ICR uses the following labor rates: Managerial \$153.55 (\$73.12+ 110%); Technical \$122.20 (\$58.19 + 110%); and Clerical \$61.51 (\$29.29 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, “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 assume that new sources will use a solvent recovery device as an add-on control device to comply with the rule. This is a one-time activity for a new facility using a solvent recovery device. Sources using solvent recovery and CEMS or CMS to comply with the rule are required to perform initial performance testing.

^d Based on review of permit data for ICR 1951.09, we estimate that an average of 90 facilities currently use add on control equipment and 80 facilities comply with the rule through the use of compliant coatings. Some permits already require periodic testing for control equipment. Periodic emissions performance testing will be required under this rule for 62 thermal oxidizers. Assume one-third are tested each year ($62/3 = 21$ per year). CMS performance is evaluated during the control device performance test for the thermal oxidizers. Annual catalyst testing will be required for 3 catalytic oxidizers.

^e Based on permit data, we assume that 80 sources comply with the rule through the use of compliant coatings and will record activities for compliant coating use.

^f We have estimated that 90 facilities currently use add on control equipment. Assuming each new facility added uses add-on control equipment, we assumed an average of 91 facilities per year with add on controls over the 3-year period.

^g We have assumed that 5% of respondents will fail to meet standards each year ($0.05 \times 171 = 8.6$, rounded to 9).

^h We have assumed that 171 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) (Renewal).

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) Managemen t person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
A. New Sources								
1. Review initial notification ^c	8	1	8	1	8	0.4	0.8	\$459.64
2. Review notification of performance test ^d	2	1	2	1	2	0.1	0.2	\$115
3. Review notification of compliance status ^c	10	1	10	1	10	0.5	1	\$574.55
4. Review performance test report and CMS performance evaluation ^{c,d}	10	1	10	1	10	0.5	1	\$574.55
B. Periodic Testing								
1. Review notification of periodic performance test and CMS performance evaluation ^e	4	1	4	21	84	4.2	8	\$4,826.22
2. Review periodic performance test and CMS performance evaluation results ^{e,f}	10	1	10	21	210	10.5	21	\$12,065.55
C. Semiannual summary report ^g	15	2	30	171	5,130	257	513	\$294,744.15
TOTAL (rounded) ^h						6,270		\$313,000

Assumptions:

^a We assume that an average of 171 respondents (170 existing, 1 new) will be subject to this rule, and that one new source will become subject to the rule each year over the three-year period of the ICR.

^b This cost is based on the average hourly labor rate as follows: Managerial \$69.04 (GS-13, Step 5, \$43.15 + 60%); Technical \$51.23 (GS-12, Step 1, \$32.02 + 60%); and Clerical \$27.73 (GS-6, Step 3, \$17.33 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical

hours. These rates are from the Office of Personnel Management (OPM), 2021 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 We have assumed that this is a one-time activity for each new facility. We assume that new sources will use a solvent recovery device as an add-on control device to comply with the rule.

^d Sources using solvent recovery and CEMS or CMS to comply with the rule are required to do initial performance testing.

^e A total of 62 thermal oxidizers will have periodic emissions performance testing requirements and CMS performance evaluations. We assume one-third of thermal oxidizers will be tested each year ($62/3 = 21$, rounded).

^f We assume that it will take the agency ten hours to review test results.

^g We assume that it will take the agency 15 hours to review the semiannual reports and that the agency will review summary reports twice per year.

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

**Appendix A – Draft Electronic Reporting Template
(see Docket ID Number EPA-HQ-OAR-2021-0106)**