

**Table 1: Annual Respondent Burden and Cost – NESHAP for Paper and Other Web Coating (4**

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 <sup>a</sup>
<b>1. Reporting requirements</b>				
A. Familiarization with regulatory requirements	8	1	8	171
B. Gather information <sup>c</sup>	4	4	16	1
C. Initial performance testing (new sources) <sup>c</sup>				
i. Initial notification	2	1	2	1
ii. Notification of performance test	2	1	2	1
iii. Notification of compliance status	2	1	2	1
iv. Performance test report	2	1	2	1
v. CMS performance evaluation	2	1	2	1
D. Periodic performance testing <sup>d</sup>				
i. Notification of test - thermal oxidizers	24	1	24	21
ii. Attend test - thermal oxidizers	10	1	10	21
iii. CMS performance evaluation - thermal oxidizers	2	1	2	21
iv. Annual catalyst test - catalytic oxidizers	2	1	2	3
E. Write reports				
Semiannual summary report	4	2	8	171
<b>Subtotal for Reporting Requirements</b>				
<b>2. Recordkeeping requirements</b>				
A. Read instructions <sup>c</sup>	4	1	4	1
B. Plan activities <sup>c</sup>	15	1	15	1
C. Implement activities for compliance coating use <sup>e</sup>	5	12	60	80
D. Implement activities for control devices and process equipment <sup>c</sup>				
i. Design analysis	12	1	12	1
ii. Performance test oversight	20	1	20	1
E. Develop record system				
ii. Develop plan for material used <sup>e</sup>	10	1	10	80
iii. Control equipment and maintenance plan <sup>c</sup>	10	1	10	1
F. Time to enter information				
i. Compliance calculation <sup>e</sup>	2	12	24	80
ii. Control equipment testing <sup>f</sup>	1	1	1	91
iii. Records of failures to meet standards/actions taken to minimize emissions <sup>g</sup>	2	12	24	9
G. Time to train personnel				
i. Acquisition and installation <sup>c</sup>	15	1	15	1
ii. Equipment inspection and monitoring <sup>f</sup>	10	1	10	91
iii. Use of technology and systems	10	1	10	171

H. Store, file and maintain records <sup>h</sup>	0.25	12	3	171
I. Retrieve records/reports <sup>h</sup>	0.25	12	3	171
<b>Subtotal for Recordkeeping Requirements</b>				
<b>Total Labor Burden and Costs (rounded) <sup>i</sup></b>				
<b>Total Capital and O&amp;M Cost (rounded) <sup>i</sup></b>				
<b>GRAND TOTAL (rounded) <sup>i</sup></b>				

**Assumptions:**

<sup>a</sup> We assume that an average of 171 respondents (170 existing, 1 new) will be subject to this rule. We assume that one new three-year period of the ICR.

<sup>b</sup> This ICR uses the following labor rates: Managerial \$153.55 (\$73.12+ 110%); Technical \$122.20 (\$58.19 + 110%); and United States Department of Labor, Bureau of Labor Statistics, March 2021, “Table 2. Civilian Workers, by occupational compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employees.

<sup>c</sup> We assume that new sources will use a solvent recovery device as an add-on control device to comply with the rule. This recovery device. Sources using solvent recovery and CEMS or CMS to comply with the rule are required to perform initial testing.

<sup>d</sup> Based on review of permit data for ICR 1951.09, we estimate that an average of 90 facilities currently use add on control equipment. Some permits already require periodic testing for control equipment. Periodic emissions performance testing is required for control equipment. Assume one-third are tested each year (62/3 = 21 per year). CMS performance is evaluated during the control equipment testing. Catalyst testing will be required for 3 catalytic oxidizers.

<sup>e</sup> Based on permit data, we assume that 80 sources comply with the rule through the use of compliant coatings and will require add on controls.

<sup>f</sup> We have estimated that 90 facilities currently use add on control equipment. Assuming each new facility added uses add on controls over the 3-year period.

<sup>g</sup> We have assumed that 5% of respondents will fail to meet standards each year (0.05 x 171 = 8.6, rounded to 9).

<sup>h</sup> We have assumed that 171 respondents will be involved in the storage, filing, maintenance and retrieval of records and reports.

<sup>i</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**0 CFR Part 63, Subpart JJJJ) (Renewal)**

(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, \$ <sup>b</sup>
1,368	68	137	\$186,086.99
16	0.8	1.6	\$2,176.46
2	0.1	0.2	\$272.06
2	0.1	0.2	\$272.06
2	0.1	0.2	\$272.06
2	0.1	0.2	\$272.06
2	0.1	0.2	\$272.06
504	25	50	\$68,558.36
210	10.5	21	\$28,565.99
42	2.1	4.2	\$5,713.20
6	0.3	0.6	\$816.17
1,368	68.4	136.8	\$186,086.99
<b>4,053</b>			<b>\$479,364</b>
4	0.2	0.4	\$544.11
15	0.75	1.5	\$2,040.43
4,800	240	480	\$652,936.80
12	0.6	1.2	\$1,632.34
20	1	2	\$2,720.57
800	40	80	\$108,822.80
10	0.5	1	\$1,360.29
1,920	96	192	\$261,174.72
91	4.55	9.1	\$12,378.59
216	10.8	21.6	\$29,382.16
15	0.75	1.5	\$2,040.43
910	45.5	91	\$123,785.94
1,710	85.5	171	\$232,608.74

Labor Rates	
Management	\$153.55
Technical	\$122.20
Clerical	\$61.51

513	25.7	51.3	\$69,782.62
513	25.7	51.3	\$69,782.62
<b>13,281</b>			<b>\$1,570,993</b>
<b>17,300</b>			<b>\$2,050,000</b>
			<b>\$975,000</b>
			<b>\$3,030,000</b>

44 hr/respons

v source each year will become subject to the rule over the

Clerical \$61.51 (\$29.29 + 110%). These rates are from the and industry group.” The rates are from column 1, “Total oyed by private industry.

s is a one-time activity for a new facility using a solvent l performance testing.

l equipment and 80 facilities comply with the rule through the nance testing will be required under this rule for 62 thermal vvice performance test for the thermal oxidizers. Annual

cord activities for compliant coating use.

-on control equipment, we assumed an average of 91 facilities

ports twelve times per year.



**Table 2: Average Annual EPA Burden and Cost – NESHAP for Paper and Other Web Coat**

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 <sup>a</sup>
<b>A. New Sources</b>				
1. Review initial notification <sup>c</sup>	8	1	8	1
2. Review notification of performance test <sup>d</sup>	2	1	2	1
3. Review notification of compliance status <sup>c</sup>	10	1	10	1
4. Review performance test report and CMS performance evaluation <sup>c, d</sup>	10	1	10	1
<b>B. Periodic Testing</b>				
1. Review notification of periodic performance test and CMS performance evaluation <sup>e</sup>	4	1	4	21
2. Review periodic performance test and CMS performance evaluation results <sup>e, f</sup>	10	1	10	21
<b>C. Semiannual summary report <sup>g</sup></b>	15	2	30	171
<b>TOTAL (rounded) <sup>h</sup></b>				

**Assumptions:**

<sup>a</sup> We assume that an average of 171 respondents (170 existing, 1 new) will be subject to this rule, and that one new source is added each year period of the ICR.

<sup>b</sup> This cost is based on the average hourly labor rate as follows: Managerial \$69.04 (GS-13, Step 5, \$43.15 + 60%); Technical \$27.73 (GS-6, Step 3, \$17.33 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality, rates of pay. The benefit packages available to government employees.

<sup>c</sup> We have assumed that this is a one-time activity for each new facility. We assume that new sources will use a solvent recovery system to meet the rule.

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

<sup>e</sup> A total of 62 thermal oxidizers will have periodic emissions performance testing requirements and CMS performance testing requirements each year (62/3 = 21, rounded).

<sup>f</sup> We assume that it will take the agency ten hours to review test results.

<sup>g</sup> We assume that it will take the agency 15 hours to review the semiannual reports and that the agency will review sources.

<sup>h</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**ing (40 CFR Part 63, Subpart JJJJ) (Renewal)**

(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, \$ <sup>b</sup>
8	0.4	0.8	\$459.64
2	0.1	0.2	\$115
10	0.5	1	\$574.55
10	0.5	1	\$574.55
84	4.2	8	\$4,826.22
210	10.5	21	\$12,065.55
5,130	257	513	\$294,744.15
<b>6,270</b>			<b>\$313,000</b>

Labor Rates	
Management	\$69.04
Technical	\$51.23
Clerical	\$27.73

source will become subject to the rule each year over the three-

Technical \$51.23 (GS-12, Step 1, \$32.02 + 60%); and Clerical  
Clerical hours are 10 percent of Technical hours. These rates are  
rates have been increased by 60 percent to account for the

nt recovery device as an add-on control device to comply with  
esting.

ce evaluations. We assume one-third of thermal oxidizers will

mmary reports twice per year.

<b>Number of Respondents</b>			
	<b>Respondents That Submit Reports</b>		<b>Respondents That Do Not Submit Any Reports</b>
	<b>(A)</b>	<b>(B)</b>	<b>(C)</b>
<b>Year</b>	<b>Number of New Respondents <sup>a</sup></b>	<b>Number of Existing Respondents</b>	<b>Number of Existing Respondents that keep records but do not submit reports</b>
1	1	169	0
2	1	170	0
3	1	171	0
Average	1	170	0

<sup>a</sup> New respondents include sources with constructed and reconstructed affected facilities.

<b>Total Annual Responses</b>			
<b>(A)</b>	<b>(B)</b>	<b>(C)</b>	<b>(D)</b>
<b>Information Collection Activity</b>	<b>Number of Respondents <sup>a</sup></b>	<b>Number of Responses</b>	<b>Number of Existing Respondents That Keep Records But Do Not Submit Reports</b>
Initial Notification	1	1	0
Notification of performance test	1	1	0
Notification of compliance status	1	1	0
Performance test reports	1	1	0
CMS performance evaluation	1	1	0
Periodic Emissions Testing of Thermal Oxidizers	21	1	0
Annual Catalyst Testing of Catalytic Oxidizers	3	1	0
CMS Performance Evaluation <sup>b</sup>	21	1	0
Semiannual report	171	2	0
			<b>Total</b>

<sup>a</sup> Based on permits examined for the recent final rule, we assume that an average of 90 facilities use add-on carbon oxidizers and 18 carbon adsorbers. Some permits already require periodic testing. We estimate that an additional 21 thermal oxidizers and 3 catalytic oxidizers will have to perform repeat testing under the rule. We assume one thermal oxidizer is tested each year ( $62/3 = 21$ , rounded). Three additional catalytic oxidizers will have to perform repeat testing in lieu of emissions testing.

<sup>b</sup> CMS performance is evaluated when a control device is tested. We assume 21 existing thermal oxidizers will be tested.

<b>Capital/Startup vs. Operation and Maintenance</b>			
<b>(A)</b>	<b>(B)</b>	<b>(C)</b>	<b>(D)</b>



<b>Continuous Monitoring Device</b>	<b>Capital/Startup Cost for One Respondent</b>	<b>Number of New Respondents <sup>a</sup></b>	<b>Total Capital/Startup Cost, (B X C)</b>
Initial performance test (inlet/outlet)	\$28,000	1	\$28,000
Parametric/continuous monitoring system (CMS)	\$10,000	1	\$10,000
Continuous emission monitoring system (CEMS)	\$183,500	1	\$183,500
Repeat emissions performance test - Thermal Oxidizers	\$28,000	21	\$588,000
Annual Catalyst Activity Testing - Catalytic Oxidizers			
<b>Totals (rounded) <sup>c</sup></b>			<b>\$810,000</b>

<sup>a</sup> We estimate that one new facility using solvent recovery (carbon adsorption) and CEMs or CMS will be covered. Initial testing is required for CEMs or CMS. Thermal oxidizers require testing, and 62 of the 123 thermal oxidizers do not already have testing. 61 (rounded) thermal oxidizers will perform periodic testing every year.

<sup>b</sup> We estimate an average of 171 sources (170 existing, 1 new) during the three-year period of this ICR. 160 use oxidizers and 11 use carbon adsorption. All of the oxidizers use parametric monitoring (CMS), and it was assumed that the remaining 6 facilities using carbon adsorption were assumed to use CEMs. Three catalytic oxidizers do not have the catalyst activity tested every year.

<sup>c</sup> Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

(D)	(E)
Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
0	170
0	171
0	172
0	<b>171</b>

(E)
Total Annual Responses E=(BxC)+D
1
1
1
1
1
21
3
21
342
<b>392</b>

ontrols, with a total of 123  
onal 65 oxidizers (62  
-third of the thermal  
annual catalyst testing, in

ill be tested each year.

(O&M) Costs		
(E)	(F)	(G)

Annual O&M Costs for One Respondent	Number of Respondents with O&M <sup>b</sup>	Total O&M, (E X F)
\$25	84	\$2,100
\$26,700	6	\$160,200
\$1,000	3	\$3,000
		<b>\$165,000</b>

\$975,000

structed each year. A facility using solvent recovery and CEMS or CMS have a testing requirement in their permit. We assume 21 ( $62/3 = 21$ ,

it data indicates that an average of 90 facilities use add-on controls (79 s assumed that 5 of the facilities using carbon adsorption do as well. The ready have a testing requirement in their permit and will comply by