

ICR Summary Information

Hours per Response	16
Number of Respondents	42
Total Estimated Burden Hours	1,340
Total Estimated Costs	\$545,000
Annualized Capital O&M	\$385,000
Total Annual Responses	85
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NSPS for Flexible Vinyl and Urethane Coatin

Burden Item	A	B	C	D
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
A. Familiarize with rule requirement ^c	1	1	1	42
B. Required Activities				
New Sources				
Initial performance test ^d	280	1	280	0.33
Repeat performance test ^{d,e}	280	0.2	56	0.33
C. Create Information	See 3B			
D. Gather Existing Information	See 3B			
E. Write Report				
New Sources				
Notification of construction/reconstruction ^f	2	1	2	0.33
Notification of initial performance test ^{e,g}	2	1.2	2.4	0.33
Report of initial performance test	See 3B			
Existing Sources				
Semiannual report ^h	4	2	8	42
Subtotal for Reporting Requirements				
4. Recordkeeping Requirements				
A. Familiarize with rule requirement	See 3A			
B. Plan Activities	See 3B			
C. Implement Activities	See 3B			
D. Develop Record System	N/A			
E. Time to Enter Information				
Records of startup, shutdown, and malfunctions ⁱ	1.5	2	3	42
Records of VOC, temperature, and CMS maintenance	0.25	52	13	42
F. Audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COSTS (rounded) ^k				
TOTAL CAPITAL AND O&M COST (rounded) ^k				
GRAND TOTAL ^k				

Assumptions:

^a We estimate that there are an average of 42 existing respondents, and it is estimated that 1 additional source will becor

^b This ICR uses the following labor rates: \$157.61 per hour for Executive, Administrative, and Managerial labor; \$123.9 Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2021, Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110% to account by private industry.

^c We estimate it will take one hour to read and familiarize with the rule. This burden item applies to all sources.

^d We estimate each performance test will take 280 hours to complete.

^e We estimate 20 percent of respondents will need to repeat the initial performance test.

^f We estimate it will take 2 hours to prepare the notification of construction/reconstruction.

^g We estimate it will take 2 hours to prepare the notification of initial performance test.

^h We estimate it will take 4 hours to compile data for semiannual reports.

ⁱ We estimate it will take 1.5 hours to record startups, shutdowns, and malfunctions.

^j We estimate it will take 0.25 hours to record VOCs, temperatures, and CMS maintenance.

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

g and Printing (40 CFR Part 60, Subpart FFF) (Renewal)

123.94 E	157.61 F	62.52 G	H
Technical hours per year	Management hours per year	Clerical hours per year	Total cost per year
(Cx D)	(Ex 0.05)	(Ex 0.10)	(\$) ^b
42	2.10	4.20	\$5,799.05
92.4	4.62	9.24	\$12,757.90
18.48	0.92	1.85	\$2,551.58
0.66	0.03	0.07	\$91.13
0.792	0.04	0.08	\$109.35
336	17	34	\$46,392.36
564			\$67,701.37
126	6.30	12.60	\$17,397.14
546	27.30	54.60	\$75,387.59
773			\$92,784.72
1,340			\$160,000
			\$385,000
			\$545,000

New Sources
Existing Sources

1,340

16 hr/response

ne subject over the next three years of this ICR.

4 per hour for Technical labor, and \$62.52 per hour for
Table 2: Civilian Workers, by Occupational and
at for the benefit packages available to those employed

0.33

42

Table 2: Average Annual EPA Burden and Cost – NSPS for Flexible Vinyl and Urethane

Burden Item	A	B	C	D
	Person hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)	Respondents per year ^a
Required Activities				
New Sources				
Initial performance tests ^c	24	1	24	0.33
Repeat performance tests ^{c, d}	24	0.2	4.8	0.33
Report Review				
New Sources				
Notification of construction/reconstruction ^e	2	1	2	0.33
Notification of initial startup ^f	0.5	1	0.5	0.33
Notification of actual startup ^g	0.5	1	0.5	0.33
Notification of initial test ^{d, h}	0.5	1.2	0.6	0.33
Review test results ^{d, i}	0.5	1.2	0.6	0.33
Existing Sources				
Semiannual reports ^j	2	2	4	42
TOTAL COST (rounded)^k				

Assumptions:

- ^a We estimate that an average of 42 existing respondents, and it is estimated that 1 additional source will become a new source.
- ^b This ICR uses the following labor rates: \$70.56 per hour for Managerial labor; \$52.37 per hour for Technical labor. These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of pay and the benefit packages available to government employees.
- ^c We estimate it will take 24 hours to participate with each performance test.
- ^d We estimate 20 percent of respondents will need to repeat the initial performance test.
- ^e We estimate it will take 2 hours to review construction/reconstruction notifications.
- ^f We estimate it will take 0.5 hours to review initial startup notifications.
- ^g We estimate it will take 0.5 hours to review actual startup notifications.
- ^h We estimate it will take 0.5 hours to review initial test notifications.
- ⁱ We estimate it will take 0.5 hours to review test results.
- ^j We estimate it will take 2 hours to review each semiannual report twice annually.
- ^k Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

: Coating and Printing (40 CFR Part 60, Subpart FFF) (Renewal)

52.37 70.56 28.34

E	F	G	H
Technical person-hours per year	Management person-hours per year	Clerical person-hours per year	Total cost per year
(CxD)	(Ex0.05)	(Ex0.10)	(\$)^b
7.92	0.40	0.79	\$465.16
1.58	0.08	0.16	\$93.03
0.66	0.03	0.07	\$38.76
0.17	0.01	0.02	\$9.69
0.17	0.01	0.02	\$9.69
0.20	0.01	0.02	\$11.63
0.20	0.01	0.02	\$11.63
168	8.40	16.80	\$9,866.98
206			\$10,510

e subject over the next three years of this ICR.

labor, and \$28.34 per hour for Clerical labor. These rates are per day. The rates have been increased by 60% to account for

Capital/Startup vs. Operation and Maintenance (O&M) Costs					
(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents ^a	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M ^b
Temperature or feed rate monitor	\$20,000	0.33	\$6,600	9000	42
Total (rounded)			\$6,600		

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

(G)
Total O&M, (E X F)
\$378,000
\$378,000

\$385,000

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 $E=(B \times C)+D$
Notification of construction/reconstruction	0.33	1	0	0.33
Notification of initial performance test	0.33	1.2	0	0.40
Semiannual Reports	42	2	0	84
			Total	85

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ^a	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
1	0.33	41	0	0
2	0.33	41.33	0	0
3	0.33	41.66	0	0
Average	0.33	41.33		

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

(E)
Number of Respondents (E=A+B+C-D)
41.33
41.66
42
41.66