

ICR Summary Information

Hours per Response	198
Number of Respondents	3
Total Estimated Burden Hours	2,240
Total Estimated Costs	\$302,000
Annualized Capital O&M	\$33,000
Total Annual Responses	11
Form Number	Not applicable

Burden Items	(A) Hours per Occurrence	(B) Occurrences per Year	(C) Hours per Year (C=AxB)	(D) Respondents per Year ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
A. Familiarize with Regulatory Requirements ^c	1	1	1	3
B. Required Activities				
Tests				
Initial performance test - APCD ^d	445	1	445	0
Conduct performance test method audits ^d	27	1	27	0
Repeat initial performance test - APCD ^e	445	1	445	0
Repeat performance test method audits ^e	27	1	27	0
Initial performance test - total enclosure ^{d, g}	215	1	215	1
Repeat initial performance test - total enclosure ^e	215	1	215	0.6
Performance test for VOC CEMs ^d	175	1	175	0
Quarterly VOC CEM audits ^f	10	4	40	2
C. Create Information	See 3B & 4E			
D. Gather Existing Information	See 3B & 4E			
E. Write Reports				
Notification of intent to construct/reconstruct ^g	6	1	6	1
Notification of construction date ^g	2	1	2	1
Actual startup notification ^g	2	1	2	1
Notification of applicability of the standard existing sources ^h	2	1	2	0
Notification of applicability of the standard new/reconstructed sources ^g	2	1	2	1
Notification of initial performance test ⁱ	2	1	2	1
Report of initial test	See 3B			
Notification of compliance status ^j	4	1	4	0
Submit startup, shutdown, malfunction plan ^j	20	1	20	0
Develop and implement quality control plan for continuous monitoring systems (CMS) ^j	50	1	50	0
Report when exceed HAP usage cutoff (or report area source becoming major sources) ^k	2	1	2	0
Waiver application ^h	6	1	6	0
Report of monitoring exceedances and periods of noncompliance, including inconsistencies with startup, shutdown, and malfunction reports ^l	16	4	64	0.3
Report of no excess emissions, including startup, shutdown, malfunction reports ^l	4	2	8	2.7

Subtotal for Reporting Requirements				
4. Recordkeeping Requirements				
A. Familiarize with Regulatory Requirements ^c	See 3A			
B. Plan Activities	N/A			
C. Implement Activities	See 4D			
D. Develop Record System ^{j, m}	40	1	40	0
E. Time to enter information				
Facilities above cutoff, including records associated with startup, shutdown, malfunction, maintenance of APCD, and measurement of freeboard ratio ⁿ	0.5	350	175	3
Maintain, adjust, and calibrate CMS and maintain records of this and any CMS malfunction that occurs ^o	6	52	312	3
Facilities below cutoff ^p	2	1	2	1
F. Time to Train Personnel	N/A			
G. Time for Audits	N/A			
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Cost (rounded) ^q				
Total Capital and O&M Cost (rounded) ^q				
Grand Total (rounded) ^q				

Assumptions:

- ^a We have assumed there are approximately 3 sources currently subject to the standard and no additional sources will
- ^b This ICR uses the following labor rates: Managerial \$157.61 (\$75.05+ 110%); Technical \$123.94 (\$59.02 + 110%) States Department of Labor, Bureau of Labor Statistics, September 2021, “Table 2. Civilian Workers, by occupation: The rates have been increased by 110 percent to account for the benefit packages available to those employed by pri
- ^c We assume that all respondents will have to familiarize themselves with regulatory requirements each year.
- ^d Hours associated with the initial performance test include preparation of site-specific test plan. Hours for performe hours. No facility is expected to conduct testing for the air pollution control device (APCD) and CEMS.
- ^e We have assumed 20 percent of sources will have to repeat initial performance tests.
- ^f All facilities using VOC continuous emission monitors (CEMs) will have to perform quarterly audits of monitors, e
- ^g It is projected that, on average, new coating lines will be added at the rate of one per year. These coating lines will and recordkeeping requirements of the standard. Also, additional emission points are likely to be tied into the existir monitors will not be necessary. However, a new total enclosure would be built and must be tested.
- ^h This is a one time activity.
- ⁱ One new total enclosure will be tested per year.
- ^j No facilities are expected to be required to report on status, or develop a startup, shutdown, malfunction plan, quali
- ^k No existing area sources are expected to exceed the HAP usage cutoff or become a major source.
- ^l These reports will include data based on CMS performance and/or material balance results. It is assumed to 90 per reporting will therefore be semiannual. We assume that 10 percent of the facilities in this source category will be sul
- ^m Activities that must be implemented at all facilities include maintaining a 75 percent freeboard ration in wash sink: system for particulate transfer. A record system will need to be developed to maintain records associated with the fr

- ⁿ All facilities subject to the control requirements of the standard will be keeping records.
- ^o All but one of the 3 facilities subject to the rule will operate a CMS, as defined in Section 63.2 of the General Provisions and will be keeping records.
- ^p Facilities that fall below the HAP usage cutoff will have to submit an annual report certifying this usage. We assume
- ^q Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

(E) Technical Person Hours per Year (E=CxD)	(F) Managerial Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.10)	(H) Total Cost per Year (\$) ^b
3	0.2	0.3	\$414.22
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
215	10.75	21.5	\$29,685.90
129	6.45	12.9	\$17,811.54
0	0	0	\$0.00
80	4	8	\$11,045.92
6	0.3	0.6	\$828.44
2	0.1	0.2	\$276.15
2	0.1	0.2	\$276.15
0	0	0	\$0.00
2	0.1	0.2	\$276.15
2	0.1	0.2	\$276.15
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
19.2	0.96	1.92	\$2,651
21.6	1.08	2.16	\$2,982

Labor Rates	
Management	\$157.61
Technical	\$123.94
Clerical	\$62.52

554			\$66,524
0	0	0	\$0
525	26.25	52.5	\$72,488.82
936	46.8	93.6	\$129,237.22
2	0.1	0.2	\$276.15
1,682			\$202,002
2,240			\$269,000
			\$33,000
			\$302,000

Responses 11
hours/response 198

l become subject to the standard over the three years of this ICR.

; and Clerical \$62.52 (\$29.77 + 110%). These rates are from the United al and industry group.” The rates are from column 1, “Total compensation.” vate industry.

nce test method audits are estimated as 6 percent of the performance test

estimated at two facilities.

. be located at existing facilities which will already be meeting the reporting ig APCD. Therefore, new compliance tests for the APCD and continuous

ty control plan for continuous monitoring system (CMS), or record system.

cent of the facilities in this source category will have no excess emission: omitting reports.

s, the use of a closed system for flushing fixed lines, and the use of a closed eboard ratio, performance test, notification, and CMS QA/QC program.

isions. The one facility that will not operate a CMS has only one control
me one facility is subject to this requirement.

Table 2: Average Annual EPA Burden and Cost - NESHAP for Magnetic Tape Manufacturing Operations

Activity	(A) EPA Hours per Occurrence	(B) Occurrences per Year	(C) EPA Hours per Year (C=AxB)	(D) Plants per Year ^a	(E) Technical Hours per Year (E=CxD)
Initial performance test - APCD ^c	60	0	0	0	0
Repeat initial performance test ^d					
1. Retesting preparation	16	0	0	0	0
2. Retesting	60	0	0	0	0
Report Review					0
Notification of construction/reconstruction ^{e, f}	2	1	2	1	2
Notification of construction date ^f	2	1	2	1	2
Notification of actual startup ^f	2	1	2	1	2
Notification of applicability -existing sources ^e	2	0	0	0	0
Notification of applicability - new/ reconstruction sources ^f	2	1	2	1	2
Notification of initial performance test - total enclosure ^g	2	1	2	1	2
Report of initial performance test ^g	8	1	8	1	8
Notification of compliance status ^e	4	0	0	0	0
Startup, shutdown, malfunction plan ^h	4	0	0	0	0
Quality control plan for CMS ^h	4	0	0	0	0
Report of monitoring exceedances and periods of noncompliance ^l	8	4	32	0.3	9.6
Report of no excess emissions ^l	2	2	4	2.7	10.8
Report for facilities below cutoff ⁱ	1	1	1	1	1
Report of area source becoming a major source or exceeding HAP usage cutoff ^j	8	0	0	0	0
Waiver application ^k	8	0	0	0	0
Total Cost (rounded)^m					

Assumptions:

^a We have assumed there are approximately 3 sources currently subject to the standard and no additional sources will be added during the three years of this ICR.

^b This cost is based on the average hourly labor rate as follows: Managerial \$70.56 (GS-13, Step 5, \$44.10 + 60%); 1 \$32.73 + 60%); and Clerical \$28.34 (GS-6, Step 3, \$17.71 + 60%). This ICR assumes that Managerial hours are 5 per hour are 10 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2022 Ger locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to gov

^c We assume that 10 percent of the tests conducted are attended by EPA.

^d We assume that 20 percent will fail the initial performance tests and will have to be retested.

^e This is a one time activity.

^f We assume that one new coating line will be added per year. This line will be at an existing facility.

^g This is based on one facility conducting tests, including retesting. It is projected that, on average, new coating lines year. These coating lines will be located at existing facilities which will already be meeting the reporting and record. Also, additional emission points are likely to be tied into the existing APCD. Therefore, new compliance tests for the not be necessary. However, a new total enclosure would be built and must be tested.

^h We assume that EPA will not review startup, shutdown, malfunction plans and CMS quality control plans.

ⁱ There will be one existing facility expected to be below the solvent usage cutoff.

^j We assume that no existing area sources are expected to exceed the HAP usage cutoff or become area sources.

^k We assume that all waiver applications have been submitted.

^l It is assumed to 90 percent of the facilities in this source category will have no excess emission: reporting will there 10 percent of the facilities in this source category will be submitting reports.

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

(40 CFR Part 63, Subpart EE) (Renewal)

(F) Managerial Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.10)	(H) Cost, \$ ^b
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0.1	0.2	\$117
0.1	0.2	\$117
0.1	0.2	\$117
0	0	\$0
0.1	0.2	\$117
0.1	0.2	\$117
0.4	0.8	\$470
0	0	\$0
0	0	\$0
0	0	\$0
0.48	0.96	\$564
0.54	1.08	\$634
0.05	0.1	\$59
0	0	\$0
0	0	\$0
45		\$2,310

Labor Rates	
Management	\$70.56
Technical	\$52.37
Clerical	\$28.34

become subject to the standard over

Technical \$52.37 (GS-12, Step 1,
percent of Technical hours, and Clerical
Clerical Schedule, which excludes
Government employees.

will be added at the rate of one per
keeping requirements of the standard.
e APCD and continuous monitors will

fore be semiannual. We assume that

Capital/Startup vs. Operation and Maintenance			
(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents ^a	Total Capital/Startup Cost, (B X C)
Total enclosure	\$11,000	1	\$11,000
VOC CEM	\$0	0	\$0
Thermo-couples	\$0	0	\$0
Totals			\$11,000
Totals (rounded) ²			\$11,000

¹ This ICR assumes three sources are currently subject to the NESHAP, and that no additional source will be added. Three of the existing sources will incur capital costs due to modification or reconstruction.

² Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

(O&M) Costs		
(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M^b	Total O&M, (E X F)
0	0	0
\$8,000	2	\$16,000
\$2,000	3	\$6,000
		\$22,000
		\$22,000

\$33,000

some subject in the next three years. However, we estimate that one of the

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
Report of monitoring exceedances and periods of non-compliance	0.3	3	0	0.9
Report of no excess emissions	2.7	2	0	5.4
Notification of Intent to Construct/Reconstruct ¹	1	1	0	1
Notification of Construction Date	1	1	0	1
Actual Startup Notification	1	1	0	1
Notification of Applicability of the Standard New/Reconstructed Sources	1	1	0	1
Notification of initial performance test – total enclosure ²	1	1	0	1
			Total	11

¹Respondents are new coating lines at existing facilities.

² New compliance tests for the APCD and continuous monitors will not be necessary. However, a new total enclosure would be built and must be tested for each new line anticipated.

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ¹	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	1	3	0	1
2	1	3	0	1
3	1	3	0	1
Average	1	3	0	1

¹ New respondents include sources with constructed, reconstructed and modified affected facilities. In this standard existing initial notifications. On average, new coating lines will be added at the rate of one per year. These coating lines will be located which will already be meeting the reporting and recordkeeping requirements of the standard.

(E)
Number of Respondents (E=A+B+C-D)
3
3
3
3

g respondents submit
ated at existing facilities