

## **SUPPORTING STATEMENT**

### **ENVIRONMENTAL PROTECTION AGENCY**

#### **NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal)**

##### **1. Identification of the Information Collection**

###### **1(a) Title of the Information Collection**

NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal), EPA ICR Number 0657.14, OMB Control Number 2060-0105.

###### **1(b) Short Characterization/Abstract**

The New Source Performance Standards (NSPS) for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) were proposed on October 28, 1980; promulgated on November 8, 1982; and most-recently amended on April 9, 2004. These regulations apply to each publication rotogravure printing press (not including proof presses) commencing construction, modification, or reconstruction after the date of proposal. New facilities include those that commenced construction, modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 60, Subpart QQ.

In general, all NSPS 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, or 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 NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least two 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's regional offices can review them. All other reports are sent to either the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the EPA's 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.

The "Affected Public" are owners or operators of publication rotogravure printing

presses. The ‘burden’ to the Affected Public may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by Federal employees or government contractors and refer to Table 2: Average Annual EPA Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal). There are approximately 6 publication rotogravure printing press facilities, which are owned and operated by the Graphic Arts Industry. None of these 6 facilities in the United States are owned by either state, or local, or tribal entities or by the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there are an average of 6 affected facilities 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 6 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. In renewing the currently-approved ICR, the agency has reviewed the number of respondents in industry and updated the burden estimates accordingly. This ICR reflects a decrease in the number of respondents following a review of EPA’s Enforcement and Compliance History Online (ECHO) database and industry consultation. In this case, we identified 6 number of sources based on consolidation within the industry. Due to this consolidation, we assume no new sources will emerge over the next three years.

The active (previous) ICR had the following Terms of Clearance (TOC):

“OMB requests that EPA reformat the Supporting Statement A to the standard 18-question format. In addition, OMB requests that EPA cut and paste the regulatory text that includes the ICR requirements, including the instructions in the regulatory text for how to submit any recording and recordkeeping requirements, into a supplementary document that is also uploaded upon renewal of this ICR.”

At the time of this renewal, the standard 18-question format template is not yet available. The Agency will update this ICR to the standard 18-question format once the template is available and upon the next renewal cycle. Respondents subject to this subpart submit semiannual reports and maintain records. The relevant regulatory text for these activities is referenced in section 4(b) of this document. We have created a supplementary document, including the regulatory text, that describes the ICR requirements as identified in section 4(b)(i) of this document as requested.

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years.

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, volatile organic compound (VOC) emissions from publication rotogravure printing presses either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart QQ.

## **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.

The notifications required in these standards are used to inform the Agency or its 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 and the 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.

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

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart QQ.

#### **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 to 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* (87 FR 43843) on July 22, 2022. 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. This ICR reflects a decrease in the number of respondents following a review of EPA's Enforcement and Compliance History Online (ECHO) database and in consultation with industry. Approximately 6 respondents will be subject to these 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 these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted the Graphic Arts Association, at (215) 396-2300, the PRINTING United Alliance, at (703) 385-1335, and Gravure Association of Americas, at (803) 948-9470. In this case, we received comments from the Gravure Association of Americas indicating there are only two companies in the United States that use the publication rotogravure printing process: Quad Graphics and LSC Communications. Upon review of ECHO data, we identified five facilities owned by these two companies, and one additional printing company actively reporting to ECHO under subpart QQ. Therefore, we have adjusted the total number of facilities subject to subpart QQ to six.

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 recordkeeping 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 same 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.

### **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 publication rotogravure printing presses. The United States Standard Industrial Classification (SIC) code for the respondents affected by these standards is SIC 2754, which corresponds to the North American Industry Classification System (NAICS) 323111 for Commercial Printing, except Screen and Books.

### **4(b) Information Requested**

#### **(i) Data Items**

In this ICR, all the data that are recorded or reported is required by the NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ).

A source must make the following reports:

<b>Notifications</b>	
Notification of construction/reconstruction	§60.7(a)(1)
Notification of actual startup	§60.7(a)(3)
Report of initial performance test results	§60.8(a), §60.433 (e)(6)
Notification of initial performance test	§60.8(d)
Notification of physical or operational change	§60.7(a)(4)
<b>Reports</b>	
Semiannual Reports	§60.7(c)

A source must keep the following records:

<b>Recordkeeping</b>	
Records of startups, shutdowns, malfunctions	§60.7(b)
Records necessary to determine conditions of the performance test	§60.7(f), §60.8(c), §60.433(a)(5)
Records showing information to make monthly calculations of emissions	§60.7(f), §60.434(a)
Records are required to be retained for two years.	§60.7(f), §60.434(a)

### 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.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Perform initial performance test, Reference Method 24A test, and repeat performance tests if 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:

<b>Agency Activities</b>
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. 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 two 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 this 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 – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (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 this 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 470 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS 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	\$157.61 (\$75.05 + 110%)
Technical	\$123.94 (\$59.02 + 110%)
Clerical	\$62.52 (\$29.77 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

### **(ii) Estimating Capital/Startup and Operation and Maintenance Costs**

The only costs to the regulated industry resulting from information collection activities required by the subject standards are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in these regulations are labor costs. There are no capital/startup and/or operation and maintenance costs, because the equipment used by the respondent is the same equipment used in their day-to-day operations to maintain quality control over the surface coating produced for sale. Further, there are no costs associated with performance testing analysis. Because 40 CFR Part 60, Subpart QQ allows facilities to use manufacturers’ supplied formulation data to determine the VOC and water content of inks and related coatings, based on coating formulation, the cost of these analyses would be avoided.

### **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 \$4,230.

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

Managerial	\$70.56 (GS-13, Step 5, \$44.10 + 60%)
Technical	\$52.37 (GS-12, Step 1, \$32.73 + 60%)
Clerical	\$28.34 (GS-6, Step 3, \$17.71 + 60%)

These rates are from the Office of Personnel Management (OPM), 2022 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 – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ)

(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 6 existing respondents will be subject to these standards. It is estimated that an additional zero (0) respondents per year will become subject to these same standards.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

<b>Number of Respondents</b>			
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports
Year	(A) Number of New Respondents <sup>1,3</sup>	(B) Number of Existing Respondents	I 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	0	6	0	0	6
2	0	6	0	0	6
3	0	6	0	0	6
Average	0	6	0	0	6

<sup>1</sup> 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 6.

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

<b>Total Annual Responses</b>			

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of initial performance test	0	1	0	0
Initial performance test report	0	1	0	0
Semiannual reports	6	2	0	12
			Total	12

The number of Total Annual Responses is 12.

The total annual labor costs are \$56,200. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (RIwal).

### **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 470 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (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 both 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 40 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. 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 83 labor hours at a cost of \$4,230; see below in Table 2: Average Annual EPA Burden and Cost – NSPS for the Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (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**

The adjustment decrease in burden from the most-recently approved ICR is due to a decrease in the number of sources. The number of facilities decreased based on a review of sources listed on the Enforcement Compliance History Online (ECHO) database and consultations with industry. The ECHO sources listed included 6 active respondents subject to subpart QQ. Additionally, consultations with Gravure Association of Americas identified two companies with operations using the publication rotogravure printing process, both of which owned facilities included in the ECHO list. Based on consultations, EPA's ECHO database, and comparisons with previous ICRs, the industry is currently declining. As a result, it is assumed no new respondents will be added over the next three years.

A reason for the change in burden may be also related to a mathematical error in the calculations for industry and agency costs. The cost calculations for industry and agency were calculated using incorrect labor hours for managerial and technical work (e.g., the managerial labor costs were inadvertently multiplied against the technical hours and vice versa).

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 40 hours per response. 'Burden' means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information 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-2022-0015. 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-2020-0015 and OMB Control Number 2060-0105 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 – NSPS for Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal)**

Burden Item	(A) Technical person- hours per occurrenc e	(B) No. of occurrences per respondent per year	(C) Technical person- hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical hours per year (E=CxD)	(F) Management hours per year (F=E $\times$ 0.05)	(G) Clerical hours per year (G=E $\times$ 0.1 )	(H) Total cost per year (\$) <sup>b</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	3	1	3	6	18.0	0.90	1.80	\$2,485.33
B. Required activities								
Initial performance test <sup>d</sup>	60	1	60	0	0	0.00	0.0	\$0.00
Repeat of performance test <sup>d,e</sup>	60	1	60	0	0.0	0.00	0.00	\$0.00
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Notification of construction, reconstruction, or modification <sup>d</sup>	2	1	2	0	0	0.00	0.00	\$0.00
Notification of actual startup <sup>d</sup>	2	1	2	0	0	0.00	0.00	\$0.00
Notification of initial performance test <sup>d</sup>	2	1	2	0	0	0.00	0.00	\$0.00
Report of performance test	See 3B							
Semiannual report <sup>f</sup>	8	2	16	6	96	4.8	9.6	\$13,255.10
<b>Subtotal for reporting Requirements</b>					<b>131</b>			<b>\$15,740</b>
4. Recordkeeping requirements								

A. Familiarize with regulatory requirements <sup>c</sup>	See 3A							
B. Plan activities	See 4C							
C. Implement activities	See 3B							
D. Develop record system <sup>g</sup>	3	1	3	0	0	0.00	0.00	\$0
E. Time to enter information								
Records of startups, shutdowns, malfunctions, etc. <sup>h</sup>	0.2	4	0.80	6	4.8	0.24	0.48	\$662.75
Records of VOC for monthly materials and emissions calculation <sup>i</sup>	1	48	48	6	288	14.4	29	\$39,765.30
F. Time to train personnel	N/A							
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>337</b>		<b>\$40,428</b>
<b>TOTAL LABOR BURDEN AND COSTS (rounded) <sup>j</sup></b>						<b>470</b>		<b>\$56,200</b>
<b>TOTAL CAPITAL AND O&amp;M COSTS (rounded) <sup>j</sup></b>								<b>\$0</b>
<b>GRAND TOTAL (rounded) <sup>j</sup></b>								<b>\$56,200</b>

<sup>a</sup> We estimate that an average of 6 existing respondents per year will be subject to the rule, and that no new, modified, or reconstructed facilities will become subject over the three-year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: Managerial \$157.61 (\$75.05 + 110%); Technical \$123.94 (\$59.02 + 110%); and Clerical \$62.52 (\$29.77 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

<sup>c</sup> We have assumed all new and existing sources will have to familiarize with the regulatory requirements each year. This requirement has been increased in order to allow facilities ample time to familiarize with the regulatory requirements. This includes the costs associated with obtaining a technical consultant.

<sup>d</sup> Costs are covered in Section 6(b)(iii) of the supporting statement. The number of respondents is covered in Section 6(d) of the supporting statement.

<sup>e</sup> We assume that 20% of new or modified sources will need to repeat the performance test.

<sup>f</sup> We have assumed all respondents will submit semiannual reports.

<sup>g</sup> We have assumed no new facilities will become subject to the standard over the next three years.



<sup>h</sup> We have assumed there are 6 existing respondents with an average of 4 presses per facility (6\*4 = 24), and there are no new or modified presses due to consolidation with industry. The number of occurrences per respondent per year is 4 (24/6=4).

<sup>i</sup> There are 4 presses per plant, so we estimate the number of occurrences per respondent per year to be 48 (4\*12 = 48).

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

**Table 2: Average Annual EPA Burden and Cost – NSPS for Graphic Arts Industry (40 CFR Part 60, Subpart QQ) (Renewal)**

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 <sup>a</sup>	(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 (\$) <sup>b</sup>
1. Review Reports								
Initial performance test <sup>c</sup>	24	0	0	0	0	0.00	0.00	\$0.00
Repeat performance test <sup>d</sup>	24	0	0	0.00	0	0.00	0.00	\$0.00
Report review								
Notification of construction, reconstruction, or modification <sup>c</sup>	2	0	0	0	0	0.00	0.00	\$0.00
Notification of actual startup <sup>c</sup>	0.5	0	0	0	0.00	0.00	0.00	\$0.00
Notification of initial performance test <sup>c</sup>	0.5	0	0	0	0.00	0.00	0.00	\$0.00
Report of performance test <sup>c</sup>	4	0	0	0	0	0.00	0.00	\$0.00
Semiannual report <sup>e</sup>	2	6	12	6.00	72	3.60	7.20	\$4,228.70
<b>TOTAL COST (rounded) <sup>f</sup></b>						<b>83</b>		<b>\$4,230</b>

<sup>a</sup> We estimate that an average of 6 existing respondents per year will be subject to the rule, and that no new, modified, or reconstructed facilities will become subject over the three-year period of this ICR.

<sup>b</sup> This cost is based on the average hourly labor rate as follows: Managerial \$70.56 (GS-13, Step 5, \$44.10 + 60%); Technical \$52.37 (GS-12, Step 1, \$32.73 + 60%); and Clerical \$28.34 (GS-6, Step 3, \$17.17 + 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), 2022 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.

- <sup>c</sup> Assumes oversight of initial performance test. This is a one-time only activity for newly constructed, and reconstructed or modified sources.
- <sup>d</sup> Assumes oversight of initial performance test. We have assumed 20 percent of new respondents will have to repeat the performance test due to failure.
- <sup>e</sup> We have assumed all respondents will submit semiannual reports.
- <sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.