

ICR Summary Information

Hours Per Response	16
Number of Respondents	43
Total Estimated Burden Hours	1,360
Total Estimated Costs	\$809,000
Annualized Capital O&M	\$623,000
Form Number	Not Applicable

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

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

Assumptions:

^a We estimate that there are an average of 43 existing respondents, and it is estimated that 1 additional source will becom

^b This ICR uses the following labor rates: Managerial \$172.41 (\$82.10+ 110%); Technical \$141.75 (\$67.50 + 110%); and Department of Labor, Bureau of Labor Statistics, December 2023, “Table 2. Civilian workers by occupational and industry increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employment with hiring, training, and equipping their employees.

^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.

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

(D)	(E)	(F)	(G)	(H)
Respondents per year ^a	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person- hours per year (G=Ex0.1)	Cost (\$) ^b
43	42.7	2.1	4.3	\$6,719.23
0.33	92.4	4.62	9.24	\$14,553.60
0.33	18.5	0.92	1.85	\$2,910.72
0.33	0.7	0.03	0.07	\$103.95
0.33	0.8	0.04	0.08	\$124.75
43	341.3	17.06	34.13	\$53,753.82
	571			\$78,166
43	128	6.399	12.798	\$20,157.68
43	554.6	27.73	55.46	\$87,349.95
	785			\$107,508
	1,360			\$186,000
				\$623,000
				\$809,000

Labor I
Technical
Management
Clerical

Responses Hr/Response
86 16

ie subject over the next three years of this ICR.

d Clerical \$71.36 ($\$33.98 + 110\%$). These rates are from the United States
y group.” The rates are from column 1, “Total compensation.” The rates are
ing workers beyond their wages and benefits, including business expenses associated

Rates
\$141.75
\$172.41
\$71.36

Table 2: Average Annual EPA Burden and Cost – NSPS for Flexible Vinyl and Urethane Coating and Printing (40

Activity	(A)	(B)	(C)	(D)	(E)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant-year (C=AxB)	Plants per year ^a	Technical person- hours per year (E=CxD)
Required Activities					
New Sources					
Initial performance tests ^c	24	1	24	0.33	7.92
Repeat performance tests ^{c, d}	24	0.2	4.8	0.33	1.58
Report Review					
New Sources					
Notification of construction/reconstruction ^e	2	1	2	0.33	0.66
Notification of initial startup ^f	0.5	1	0.5	0.33	0.17
Notification of actual startup ^g	0.5	1	0.5	0.33	0.17
Notification of initial test ^{d, h}	0.5	1.2	0.6	0.33	0.20
Review test results ^{d, i}	0.5	1.2	0.6	0.33	0.20
Existing Sources					
Semiannual reports ^j	2	2	4	43	170.6
TOTAL (rounded) ^k					

Assumptions:

^a We estimate that an average of 43 existing respondents, and it is estimated that 1 additional source will become subject over

^b This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%); Technical Clerical \$30.88 (GS-6, Step 3, \$19.30+ 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and These rates are from the Office of Personnel Management (OPM), 2024 General Schedule, which excludes locality, rates of pay account for 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.

CFR Part 60, Subpart FFF) (Renewal)

(F)	(G)	(H)
Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost (\$) ^b
0.40	0.79	\$507
0.08	0.16	\$101
0.03	0.07	\$42
0.01	0.02	\$11
0.01	0.02	\$11
0.01	0.02	\$13
0.01	0.02	\$13
8.5	17.1	\$10,922
209		\$11,620

Labor Rates	
Managerial	\$76.91
Technical	\$57.07
Clerical	\$30.88

er the next three years of this ICR.
l \$57.07 (GS-12, Step 1, \$35.67 + 60%); and
Clerical hours are 10 percent of Technical hours.
ay. The rates have been increased by 60 percent to

Capital/Startup vs. Operation and Maintenance (
(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)
Temperature or feed rate monitor ^a	\$31,873	0.33	\$10,518
Totals (rounded) ^b			\$10,500

^a Capital/Startup and O&M costs have been adjusted from 2007 \$ to 2024 \$ using the CEPCI CE Index.

^b 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	Total O&M, (E x F)
\$14,343	43	\$611,876
		\$612,000

\$623,000

CEPCI Index 2007:
CEPCI Index 2024:

499.6

796.2

Number of Respondents			
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports
	(A)	(B)	(C)
Year	Number of New Respondents ¹	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports
1	0.33	42.0	0
2	0.33	42.3	0
3	0.33	42.7	0
Average	0.33	42.3	0

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

nts	
(D)	(E)
Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
0	42.3
0	42.7
0	43.0
0	42.7

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	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	43	2	0	85
		Total (rounded)		86