

**SF-83 SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR part 63, subpart M)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR part 63, subpart M) (Renewal)

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Perchloroethylene (PCE) Dry Cleaning Facilities in subpart M were proposed on December 9, 1991, and promulgated on September 22, 1993. These standards apply to the following dry cleaning facilities in subpart M: existing facilities operating dry-to-dry machines only and consuming over 0.8 megagrams per year (Mg/yr) [140 gallons (gal)] of PCE; existing facilities operating transfer machines systems consuming over 1.1 Mg/yr (200 gal); existing facilities operating both dry-to-dry machines and transfer machine systems consuming over 0.8 Mg/yr of PCE; or new facilities entering the dry cleaning business. This information is being collected to assure compliance with 40 CFR part 63, subpart M.

Owners or operators of the affected facilities described must make one-time-only notifications. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. Monitoring requirements specific to NESHAP for Perchloroethylene Dry Cleaning Facilities in subpart M, provide information on the operation of the control device and pollution prevention practices along with compliance with the standard. All facilities must maintain yearly PCE consumption records and must implement a leak detection and repair program.

Owners or operators must submit required reports to the United States Environmental Protection Agency (EPA) or the delegated state regulatory authority. These notifications, reports, and records are essential in determining compliance; and are required, in general, of all sources subject to NESHAP. Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Approximately 32,000 sources are currently subject to the regulation, and it is estimated that an additional 2,240 sources per year will become subject to the regulation in the next three years, but that the overall number of facilities will remain constant as the new owners will take over old existing facilities. The estimated labor cost of this Information Collection Request

(ICR) will be \$25,725,630 (rounded).

The Office of Management and Budget (OMB) approved the current ICR without any “Terms of Clearance.”

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, Section 114(a) states that the Administrator may require any owner or 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, perchloroethylene emission from dry cleaning facilities causes or contributes to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 63, subpart M.

2(b) Practical Utility/Users of the Data

The control of emissions of perchloroethylene from dry cleaning facilities requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of perchloroethylene from dry cleaning facilities are the result of operating the dry cleaning units. These standards rely on the reduction of PCE emissions by refrigerated condensers or carbon absorbers, and pollution prevention.

The required notifications are used to inform the Agency or delegated authority when a source becomes subject to the standard. The records and reports are necessary to enable the reviewing authority to identify facilities that may not be in compliance with the standard. Based on reported information, the reviewing authority can decide which facilities should be offered compliance assistance and/or inspected, and what records or processes should be inspected at

these facilities. The records that the facilities maintain would indicate to the authority whether transfer emissions and other fugitive emissions are being properly controlled. The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate the control equipment and achieve continuous compliance with the regulation.

Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court. To minimize the burden, much of the information, which is kept onsite, would be reviewed by enforcement personnel during an inspection and would not need to be routinely reported to the authority.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart M.

3(a) Nonduplication

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 their own similar 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, no duplication exists.

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 (71 FR 35652) on June 21, 2006. No comments were received on the burden published in the Federal Register.

3(c) Consultations

For this information collection, we used several different resources to obtain the most recent data available for dry cleaning facilities sources. We referenced the most recent ICR, and reviewed information available from the Office of Compliance Sector Notebook "Profile of the Dry Cleaning Industry," and the Sector Notebook Data Refresh - 1997. We also accessed the most recent data available on the Air Facility System (AFS) database as maintained by the Office of Compliance. In addition, we contacted the Census Bureau, Mr. John Meijer, International Fabricare Institute (IFI), (301) 622-1900.

Based on conversations with consultants and information gathered, we estimate that there will be 32,000 respondents with 2,240 turn over of affected facilities per year over the next three years.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

3(e) General Guidelines

These standards require affected facilities to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the part 70 permit program and the five-year statute of limitations on which the permit program is based. Also, the retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than five years.

No other reporting or recordkeeping requirements violate the regulations established by OMB at 5 CFR 1320.5.

3(f) Confidentiality

The required information has been determined not to be confidential. However, 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 (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

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC and NAICS Codes

The respondents to the recordkeeping and reporting requirements are existing cleaning facilities operating dry-to-dry machines only and consuming 0.8 megagrams per year (Mg/yr) [140 gallons (gal)] of PCE; existing facilities operating transfer machines systems consuming

more than 1.1 Mg/yr (200 gals); existing facilities operating both dry-to-dry machines and transfer machines systems consuming more than 0.8 Mg/yr of PCE; or new facilities entering the dry cleaning business (United States Standard Industrial Classification (SIC) Codes 7215, 7216, and 7218 corresponding to North American Industry Classification System (NAICS) Codes 812310, 812320, and 812332). New dry cleaning facilities are those systems that commence construction/reconstruction on or after December 9, 1991. Other systems are existing PCE dry cleaning facilities.

4(b) Information Requested

(i) Data Items

All data in this ICR that is recorded and/or reported is required by National Emission Standards for Hazardous Air Pollutants for Perchloroethylene Dry Cleaning Facilities (40 CFR part 63, subpart M).

A source must make the following reports:

| Reports for 40 CFR part 63, subpart M | |
|--|-----------|
| Initial notifications | 63.324(a) |
| Initial report requirements | 63.324(a) |
| Compliance report | 63.324(b) |
| Facility status change | 63.324(c) |
| Exceedence of low solvent consumption exemption level. | 63.324(c) |

A source must maintain the following records:

| Recordkeeping for 40 CFR part 63, subpart M | |
|---|-------------|
| Solvent purchases per month and calculation of yearly PCE consumption. | 63.324(d) |
| Weekly or biweekly inspections. | 63.324(d) |
| Date of repairs or purchase orders for repairs. | 63.324(d) |
| Monitoring of control equipment. | 63.324(d) |
| Design specification and operating manual for dry cleaning systems and emission control device. | 63.324(e) |
| All reports and notifications. | 63.10(b) |
| Record of applicability. | 63.10(b)(3) |

(ii) Respondent Activities

| Respondent Activities |
|------------------------------|
| Read instructions. |

| Respondent Activities |
|---|
| Install, calibrate, maintain, and operate control device. |
| Perform initial performance 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 the purpose of collecting, validating, and verifying information. |
| Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information. |
| Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information. |
| Adjust existing ways to comply with any previously applicable instructions and requirements. |
| Train personnel to be able to respond to a collection of information. |
| Transmit, or otherwise disclose the information. |

Presently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., leaks of perchloroethylene). Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronic reporting systems are still not widely used by the regulatory agencies.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

| Agency Activities |
|---|
| 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 Air Facility System database. |

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, 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.

Information contained in the reports is entered into the Air Facility System (AFS), which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for over 100,000 industrial government-owned facilities. EPA uses AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. 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 or operator for five years.

5(c) Small Entity Flexibility

A majority of the affected facilities are primarily small entities (e.g., small businesses). When developing the regulation, EPA took special steps to ensure that the burdens imposed on small entities were reasonable. For example, an in-depth economic analysis (comparable to a Regulatory Flexibility Analysis) was conducted and documented in: "Economic Impact of Regulatory Control in the Dry Cleaning Industry," EPA-45/3-91-021. Because of the large number of small businesses in this industry, the reporting requirements for the individual cleaning facilities are minimal. There are no quarterly, semiannual, or annual reporting requirements as there are with most regulated large industries. The burden is further minimized since costly monitoring equipment, such as a continuous monitor, is not required. In a conscience effort to allow smaller businesses to carry a lesser burden than their larger counterparts, the weekly recordkeeping requirement for leak detection and repair is reduced to biweekly for the smallest dry cleaning facilities.

Several steps have been taken to ensure that small entities are informed of NESHAP and their reporting and recordkeeping responsibilities. Following the publication of the promulgated rule, copies of the Federal Register notice and, in some cases, background documents were mailed to all industries and organizations who have had input during the regulation development and to relevant state and local agencies. Trade associations distributed copies of the Federal Register notice to their members. Also, newspaper articles were published to reach the smallest dry cleaning facility owners or operators. The EPA, States and local agencies offered compliance assistance to dry cleaners in order to assist them in complying with the NESHAP regulations with minimal burdens.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Industry Burden for NESHAP for Perchloroethylene Dry Cleaning

Facilities (40 CFR part 63, subpart M).

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 the 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 not conduct or 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 1,537,784 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses a Technical rate for dry cleaner employees of \$7.86 per hour. This rate is from the United States Department of Labor, Bureau of Labor Statistics, Occupational Employment Statistics, "2001 National Occupational Employment and Wage Estimates." The Managerial rate of \$31.10 per hour was used. This rate is from the United States Department of Labor, Bureau of Labor Statistics, "Table 10. Private industry, by occupational and industry group," December 2002. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

The only type of industry cost associated with the information collection activity in the regulations are labor costs and operation and maintenance costs. There are no capital/startup costs. The average annual burden for capital costs to industry over the next three years of the ICR is estimated to be zero. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage which are itemized in the following table.

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

The capital/startup costs are one-time-only cost when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing cost to maintain the monitors and other costs such as photocopying and postage.

| Capital/Startup vs. Operation and Maintenance (O&M) Costs | | | | | | |
|--|--|--|------------------------------------|--|--|-----------------------------|
| (A) Continuous Monitoring Device | (B) Startup Cost for One Affected Facility | (C) Number of New Affected Facilities to Startup | (D) Total Startup (B X C) | (E) ¹ Annual O&M Costs for One Affected Facility | (F) Number of Affected Facilities with O&M | (G) Total O&M (E X F) |
| N/A | N/A | N/A | N/A | \$1.20 | 32,000 | \$38,400.00 |
| N/A | N/A | N/A | N/A | \$6.37 | 2,240 | \$14,268.80 |
| N/A | N/A | N/A | N/A | \$6.00 | 112 | \$672.00 |
| | | | | | TOTAL | \$53,340.80 |

The total capital/startup cost for this ICR is zero. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$53,341. This is the total of column G.

The total respondent non-labor costs have been calculated as the addition of the capital/startup costs, and the annual operation and maintenance costs. The average annual cost for capital/startup and operation and maintenance costs to industry of the next three years of the ICR are estimated to be \$53,341.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. Publication and distribution of the information are part of the AFS program. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of EPA's overall compliance and enforcement program.

The average annual Agency cost during the three years of the ICR is estimated to be \$203,862. (See Table 2: Average Annual EPA Burden - NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR part 63, subpart M)). This cost is based on the average wage of a GS-13, Step 5, for manager rates, GS-12 Step 1, for technical rates, and GS-6, Step 3, for clerical support and travel associated with compliance activities. Details upon which this estimate is based appear in Table 2.

6(d) Estimating the Respondent Universe and Total Burden and Costs

¹ ? 1) The cost of photocopying 32,000 one page per month for twelve months @ \$1.20, 2) The cost of postage to mail initial notification and compliance report for 2,240 @ \$6.37, 3) The cost of postage to mail solvent consumption report is \$6.00 per report.

| Respondent Universe and Number of Responses Per Year | | | | | | |
|---|---|---|---|--|--|---|
| Regulation Citation 40 CFR Part 63, Subpart M | (A) Average Number of New Respondents per Year | (B) Number of Reports for New Sources | (C) Number of Existing Respondents | (D) Number of Reports for Existing Sources | (F) Number of Respondents That Keep Records but Do Not Submit Reports | (E) Total Annual Responses (AxB)+(CxD) +F |
| Write Initial Notification Report | 2,240 | 1 | 32,000 | 0 | 32,000 | 34,240 |
| Compliance Method Report | 1,568 | 1 | N/A | 0 | N/A | 1,568 |
| Solvent Consumption Report | 672 | 1 | N/A | 0 | N/A | 672 |
| Report Exceed Consumption Cutoff | 112 | 1 | N/A | 0 | N/A | 112 |
| | | | | | TOTAL | 36,592 |

The number of total respondents is 34,240. This number is the sum of column A, line 1 and column C, line 1 of the Respondent Universe and Number of Responses Per Year table. This represents the number of existing sources plus the number of new sources averaged over the three-year period (i.e., the total of the number of new respondents over the three-year period divided by three years).

The number of Total Annual Responses is 36,592. This is the number in column E of the Respondent Universe and Number of Responses Per Year table.

The total annual labor costs are \$25,725,630 (rounded). Details upon which this estimate is based appear in Table 1: Annual Respondent Burden and Cost - NESHAP for Perchloroethylene Dry Cleaning Facilities, (40 CFR part 63, subpart M).

The total annual capital and O&M costs to the regulated entity are \$53,000. These costs are detailed in section 6(b)(iii), Capital/Startup vs. Operating and Maintenance (O&M) Costs.

6(e) Bottom Line Burden Hours Burden Hours and Cost Tables

The bottom line burden hours and cost tables for both the Agency and the respondents are attached. The annual public reporting and recordkeeping burden for this collection of information are estimated to average one hour per response.

6(f) Reasons for Change in Burden

There is no change in hours in the total estimated burden currently identified in the OMB Inventory of Approved ICR Burdens. It is estimated that an additional 2,240 sources per year

will remain subject to the regulation in the next three years, but that the overall number of facilities will remain constant as the new owners will take over old existing facilities. This was verified by contacting a number of Trade Associations, and subsequently determined that the number of respondents subject to the rules addressed by this ICR is 32,000.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average approximately 42 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 not conduct or sponsor, and a person is not required to respond to, a collection for information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 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-OECA-2006-0441, which is available for online viewing at www.regulations.gov, or in person viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Avenue, N.W., Washington, D.C. 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. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1927. An electronic version of the public docket is available online at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public 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 above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, D.C. 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2006-0441 and OMB Control Number 2060-0234 in any correspondence.

NOTE: The EPA Docket Center suffered damage due to flooding during the last week of June 2006. The Docket Center is continuing to operate. However, during the cleanup, there will be temporary changes to Docket Center telephone numbers, addresses, and hours of operation for people who wish to visit the Public Reading Room to view documents. Consult EPA's Federal Register notice at 71 FR 38147 (July 5, 2006) or the EPA website at

www.epa.gov/epahome/dockets.htm for current information on docket status, locations and telephone numbers.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting the information.

Table 1. Annual Industry Burden - NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR part 63, subpart M)

| Burden Item | (A) | (B) | (C) | (D) | (E) | (F) | (G) | (H) |
|---------------------------------------|----------------------|------------------------------|-----------------------------------|----------------------|-----------------------------|--|------------------------------|----------------------|
| | Hours per Occurrence | Occurrences Respondent/ Year | Hours Respondent/ Year (A x B) | Respondent/ per Year | Mgmt hrs/ Year ^a | Tech hrs/ Year ^b \$65.31 | Employee hrs/Year \$16.51 | Cost, \$ (E + F) |
| 1. APPLICATIONS | N/A | | | | | | | |
| 2. SURVEY AND STUDIES | N/A | | | | | | | |
| 3. REPORTING REQUIREMENTS | | | | | | | | |
| A. Read Instructions | 1 | 1 | 1 | 2,240 ^c | 2,240 ^e | 0 | 2,240 | 146,294.40 |
| B. Required activities | N/A | | | | | | | |
| C. Create Information | N/A | | | | | | | |
| D. <u>Gather existing information</u> | | | | | | | | |
| Initial report information | 2 | 1 | 2 | 2,240 ^c | 224 | 4,256 | 4,480 | 84,896.00 |
| Solvent consumption | 1 | 1 | 1 | 2,240 ^c | 112 | 2,128 | 2,240 | 42,448.00 |
| Compliance method report | 1 | 1 | 1 | 1,568 ^d | 78 | 1,490 | 1,568 | 29,694.08 |
| E. <u>Write Report</u> | | | | | | | | |
| Initial notification report | 1 | 1 | 1 | 2,240 ^c | 112 | 2,128 | 2,240 | 42,448.00 |
| Compliance method report | 1 | 1 | 1 | 1,568 ^d | 1,568 | 0 ^e | 1,568 | 102,406.08 |
| Solvent consumption report | 0.25 | 1 | 0.25 | 672 ^g | 168 | 0 ^e | 168 | 10,972.08 |
| Report-exceed consumption cutoff | 1 | 1 | 1 | 112 ^h | 112 | 0 ^e | 112 | 7,314.72 |
| 4. RECORDKEEPING REQUIREMENTS | | | | | | | | |
| A. Read Instructions | Included in 3A | | | | | | | |
| B. Plan activities | 1 | 1 | 1 | 2,240 ^c | 0 | 2,240 ⁱ | 2,240 | 36,982.40 |
| C. Implement activities | | | | | | | | |
| Weekly Leak detection/repair | 0.75 | 52 ^j | 39 | 22,400 ⁿ | 0 | 873,600 ⁱ | 873,600 | 14,423,136.00 |
| Bi-weekly leak detection/repair | 0.75 | 26 ^k | 19.5 | 9,600 ⁿ | 0 | 187,200 ⁱ | 187,200 | 3,090,672.00 |
| D. Develop record system | | | | | | | | |
| Solvent consumption | 1 | 1 | 1 | 2,240 ^c | 0 | 2,240 ⁱ | 2,240 | 36,982.40 |
| Leak detection | 1 | 1 | 1 | 2,240 ^c | 0 | 2,240 ⁱ | 2,240 | 36,982.40 |
| Monitoring records | 1 | 1 | 1 | 1,568 ^d | 0 | 1,568 ⁱ | 1,568 | 25,886.68 |
| E. Time to enter information | | | | | | | | |
| Records of solvent consumption | 0.25 | 12 ^l | 3 | 32,000 ^m | 9 ^f | 95,991 | 96,000 | 1,585,399.19 |
| Records weekly inspections | 0.25 | 52 ^j | 13 | 22,400 ⁿ | 39 ^f | 291,161 | 291,200 | 4,809,615.19 |
| Records of bi-weekly inspections | 0.25 | 26 | 6.5 | 9,600 ⁿ | 0 | 62,400 ⁱ | 62,400 | 1,030,224.00 |
| F. Time to Train personnel | | | | | | | | |
| Leak detection | 1 | 2 ^o | 2 | 2,240 ^c | 2,240 ^p | 2,240 ^p | 4,480 | 183,276.80 |
| G. Time for audits | N/A | | | | | | | |
| TOTAL ANNUAL BURDEN | | | | | <u>6,902</u> | <u>1,530,882</u> | <u>1,537,784</u> | <u>25,725,630.42</u> |

$$(C) = (A) \times (B)$$

$$(G) = (E) + (F)$$

Assumptions:

- a. Assume that hours are 5% of the employee hours unless otherwise noted. The management labor rate of \$31.10 was obtained from the United States Department of Labor, Bureau of Labor Statistics, September 2002, "Table 10. Private industry, by occupational and industry group." The wage rate obtained from the table has been increased by 110% to account for the benefit packages available to those employed by private industry.
- b. Assume technical labor rate for dry cleaner employees of \$7.86, was obtained from the United States Department of Labor, Bureau of Labor Statistics, September 2002, "Table 10. Private industry, by occupational and industry group." The wage rate obtained from the table has been increased by 110% to account for the benefit packages available to those employed by private industry.
- c. Assume that there are 32,000 existing cleaners and that 2,240 cleaners will leave the industry and will be replaced by 2,240 new dry cleaners.
- d. Based on the estimate that 1,568 (70%) of the 2,240 new facilities will be above the cutoff and thus required to perform this task.
- e. This task requires management hours only.
- f. This task is performed primarily by technical staff. Management hours are only for a limited number of major sources.
- g. Based on the estimate that 672 (30%) of the 2,240 new facilities will be below the cutoff and thus required to perform this task.
- h. It is estimated that 5% of existing facilities each year that were initially below the consumption cutoff will exceed the cutoff, thus requiring submission of the Exceed Consumption Cutoff Report.
- i. This task requires only technical employee hours.
- j. Occurrences are based on weekly inspection, assuming 52 weeks per year.
- k. Assume that facilities below cutoff performs leak detection and repairs on a bi-weekly basis.
- l. Occurrences based on twelve months rolling average of PCE/perchloroethylene consumption, determined once per month.
- m. Based on 32,000 facilities performing this task every year.
- n. Assume that of 32,000 perchloroethylene dry cleaners 22,400 will be above the per consumption cutoff, which will require that the cleaner conduct weekly leak detection and repair. The remaining 9,600 perchloroethylene dry cleaners are below the consumption cutoff and are only required to conduct bi-weekly leak detection and repair.
- o. Estimates includes hours for training, one owner/operator and one employee.
- p. This task requires an equal amount of management and technical employee hours.

TABLE 2: AVERAGE Annual EPA Burden - NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR part 63, subpart M)

| Burden Item | (A) EPA Technical hrs / Occurrence | (B) Occurrences Per year | (C) Technical hrs / year \$39.49 | (D) Mgmt hrs/ hour/year \$53.22^e | (E) Clerical hrs/ Plant/Year \$21.38^e | (F) EPA COST/ Year |
|---|---|---|---|--|---|-----------------------------------|
| Report Review | | | | | | |
| New Plant ^a | | | | | | |
| Initial notification report | 1 | 2,240 | 2,240 | 112 | 224 | 99,207.36 |
| Solvent consumption report ^b | 1 | 672 | 672 | 34 | 67 | 29,779.22 |
| Report-exceed consumption cutoff ^c | | 1 | 112 | 112 | 11 | 4,977.38 |
| Compliance method report ^d | 1 | 1,568 | 1,568 | 78 | 179 | 69,898.50 |
| Total Burden and Cost | | | <u>4,592</u> | | <u>203,862.46</u> | |

Assumptions:

- a. Costs are based on the following hourly rates obtained from the Office of Personnel Management (OPM) "2003 General Schedule" which excludes locality rates of pay:
1) Clerical at \$13.36, 2) Technical at \$24.68, and 3) Managerial at \$33.26. These rates are increased by 60% to account for government overhead expenses.
b. Area sources consuming less than 140 gallons of perchloroethylene per year: 30 % of total number of new sources.
c. Assume that 5% will have to report-exceed consumption cutoff.
d. Area sources consuming between 140 to 200 gallons of perchloroethylene per year: 70%
e. Management hours and clerical hours amount to 5% and 10%, respectively, of the technical hours.