

OMB 83-I AND SUPPORTING STATEMENT FOR  
NATIONAL PERCHLOROETHYLENE AIR EMISSION STANDARDS FOR  
DRY CLEANING FACILITIES  
(40 CFR PART 63, SUBPART M)

U.S. Environmental Protection Agency  
Office of Air Quality Planning and Standards  
Research Triangle Park, NC 27711

July 13, 2006

PART A OF THE SUPPORTING STATEMENT FOR STANDARD FORM 83  
PERCHLOROETHYLENE (PCE) DRY CLEANING FACILITIES

**1. IDENTIFICATION OF THE INFORMATION COLLECTION**

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

AICR for National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities Subpart M - Recordkeeping and Reporting Requirements@

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

The National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities (40 CFR part 63, subpart M) were proposed on December 9, 1991 and promulgated on September 22, 1993. EPA reviewed the standards under sections 112(d)(6) and 112(f) of the Clean Air Act and proposed on December 21, 2005 additional monitoring requirements beyond those promulgated on September 22, 1993. These additional requirements are being finalized on July 13, 2006. The additional requirements are monthly leak detection using handheld instruments. This supporting statement addresses only the additional recordkeeping and reporting requirements associated with the final revisions.

To comply with the final revisions to these dry cleaning National Emission Standards for Hazardous Air Pollutants (NESHAP), owners or operators of dry cleaning facilities would read instructions to determine how they will be affected by the final revisions. Major and area sources will begin an enhanced leak detection and repair (LDAR) program that requires a handheld portable monitor. Owners and operators of major and area sources will conduct enhanced LDAR and keep monthly records of enhanced LDAR events. Major source facilities will purchase a photoionization detector or other perchloroethylene (PCE) gas analyzer and area sources will purchase a halogenated hydrocarbon

leak detector. Owners and operators will incur the capital/startup cost of purchasing the monitors, plus ongoing annual operation and maintenance costs of those instruments. The total capital/startup cost for this ICR is \$5,344,740, which includes one year of annual operation and maintenance.

This information is being collected to assure compliance with 40 CFR part 63, subpart M. In addition to the final revisions, new and existing dry cleaning facilities would continue to comply with all requirements of the 1993 NESHAP. Control requirements are based on the type of dry cleaning machine and annual consumption of PCE. Owners or operators will continue to keep records and submit required reports to EPA or the delegated State regulatory authority. Notifications, reports, and records are essential in determining compliance; and are required, in general, of all sources subject to NESHAP. Owners or operators subject to the dry cleaning NESHAP continue to maintain records and retain them for at least 5 years following the date of such measurements, reports, and records. Information collection requirements that were promulgated on September 22, 1993 in the dry cleaning NESHAP prior to the final amendments, as well the NESHAP general provisions (40 CFR part 63, subpart A), which are mandatory for all owners or operators subject to national emission standards, are documented in EPA ICR No. 1415.05.

Approximately 28,000 sources are currently subject to the standard. Of those, 8,000 are located in states (CA, ME, NY, RI) that already require an enhanced LDAR program that is similar to the final NESHAP revisions. Therefore, 20,000 sources will be affected by the enhanced LDAR requirement.

It is estimated that an additional 2,330 area sources per year will become subject to the regulation in the next 3 years,

but that the overall number of facilities will remain constant due to retirement of old existing facilities. No new major sources are expected. The burden for new area sources is documented in EPA ICR No. 1415.05, therefore, burden for new area sources is not calculated in this ICR. The estimated labor cost of this ICR is \$3,960,354.

## **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 (CAA), as amended, to establish emission standards for major sources and area sources of hazardous air pollutants. Under section 112(d)(6) of the CAA, EPA is required every 8 years to review and, as necessary, revise standards, taking into account developments in practices, processes, and control technologies. Under section 112(f) of the CAA, EPA is required to evaluate the remaining risk to the public and revise the standards as necessary to provide an ample margin of safety to protect public health. The final standards would continue to apply to new and existing sources of hazardous air pollutants. In addition, section 114(a) of the CAA states that the Administrator may require any owner or operator subject to any requirement of the CAA to do the following:

- \$ Establish and maintain such records;
- \$ make such reports;
- \$ install, use, and maintain such monitoring equipment, and use such audit procedures, or methods;
- \$ 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);
- \$ keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical;
  - \$ submit compliance certifications in accordance with Section 114(a)(3); and
  - \$ provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, PCE emissions from dry cleaning facilities cause or contribute 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 PCE from dry cleaning facilities requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of PCE from dry cleaning facilities are the result of operating the dry cleaning units. The standards promulgated on September 22, 1993 rely on the reduction of PCE emissions by refrigerated condensers or carbon absorbers, and operating standards. The EPA proposed on December 21, 2005 to revise the operating standards to require an enhanced LDAR program to identify and repair fugitive emissions. The final standards reflect this revision.

The records that the facilities maintain will indicate to the authority whether liquid and vapor leaks are being properly controlled. The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR

will be used by EPA to ensure that facilities affected by the NESHAP conduct proper maintenance to minimize fugitive emissions.

Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with the standards, as required by the CAA. 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 on site, could 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 on December 21, 2005 as part of the proposed revisions to the dry cleaning standards. No comments were received that would have resulted in revisions to this ICR. The final ICR will be announced in the

Federal Register as part of the promulgated revisions to the dry cleaning standards.

**3(c) Consultations.**

The EPA tried to reduce the impact of the final revisions on small entities. When developing the final revisions, EPA took special steps to ensure that the burden, including recordkeeping and reporting, imposed on small entities was minimal. Prior to the proposal of these amendments, EPA conducted several meetings with industry trade associations to discuss regulatory options and the corresponding recordkeeping and reporting, and allowed for public review and comment during the public comment period for the proposal. (See section 5(c) of this supporting statement.)

**3(d) Effects of Less Frequent Collection.**

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the dry cleaning standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied. If the information required by the standards were collected less frequently, the likelihood of detecting poor operation and maintenance would decrease and emissions would increase.

**3(e) General Guidelines.**

The standards require affected facilities to maintain all records, including reports and notifications for at least 5 years. This is consistent with the General Provisions as applied to the standards. Also, the retention of records for 5 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 5 years. The EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than 5 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.**

Respondents are existing dry cleaning facilities that use PCE. There are 12 major source dry cleaning facilities and no new major source facilities are expected. The EPA estimates that there are 28,000 existing area sources (NAICS Codes 812310, 812320, and 812332). An additional 2,330 new area sources per year will become subject to the regulation in the next 3 years, but the overall number of facilities will remain constant due to retirement of old existing facilities. The burden for new area sources is documented in EPA ICR No. 1415.05, therefore, burden for new area sources is not calculated in this ICR.



**4(b) Information Requested.**

(i) Data Items. Data in this ICR that is recorded would be required by the final revisions to the National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities (40 CFR part 63, subpart M). A source must keep the following records and complete the following respondent activities:

Recordkeeping for 40 CFR part 63, subpart M

\$ Monthly enhanced LDAR 63.322(d)(3)

\$ Date of repairs or purchase orders for repairs  
63.324(d)(4)

(ii) Respondent Activities.

\$ Read instructions.

\$ Complete monthly enhanced LDAR using a handheld instrument.

\$ Adjust existing ways to comply with any previously applicable instructions and requirements.

\$ Modify the existing recordkeeping system for the purpose of recording results of monthly enhanced LDAR.

\$ Enter information required to be recorded above.

**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.

Agency Activities:

\$ Review records required to be kept by industry.

\$ Audit facility records as needed.

**5(b) Collection Methodology and Management.**

The reviewing authority might inspect the source to determine whether the dry cleaning equipment is properly maintained. Data and records maintained by the respondents may be tabulated and published for use in compliance and enforcement programs.

**5(c) Small Entity Flexibility.**

Affected facilities are primarily small entities (e.g., small businesses). During the development of the the final revisions, EPA took special steps to ensure that the burden imposed on small entities was reasonable. Prior to proposal of these amendments, EPA conducted several meetings with industry trade associations to discuss regulatory options and the corresponding recordkeeping and reporting. In addition, for the 1993 promulgated standards, an in-depth economic analysis (comparable to a Regulatory Flexibility Analysis) was conducted and documented in A Economic Impact of Regulatory Control in the Dry Cleaning Industry, @ EPA-45/3-91-021. An Economic Impact Analysis was also conducted for these final standards to ensure that there would not be a significant impact from these requirements on a substantial number of small entities. 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. To complete monthly enhanced LDAR, area source dry cleaning facilities may use a halogenated leak detector, instead of a more costly PCE gas analyzer as required for major sources.

**5(d) Collection Schedule.**

The specific frequency for each information collection activity within this request is shown in Table A1 (Annual Industry Burden - 2006 Revisions to NESHAP for Perchloroethylene Dry Cleaning Facilities - 40 CFR part 63, subpart M).

## **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

Table A1 documents the individual burden items for the recordkeeping requirements resulting from the final revisions to the dry cleaning NESHAP. The individual burdens are expressed under standardized headings 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. An 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 from these recordkeeping and reporting requirements of the proposed revisions is estimated to be 241,212 hours (Total Labor Hours from Table A1).

### **6(b) Estimating Respondent Costs.**

(i) Estimating Labor Costs. This ICR uses a base technical labor rate for dry cleaner employees of \$8.53 per hour. This rate is from the United States Department of Labor, Bureau of Labor Statistics, Occupational Employment Statistics, September 2002. The wage was increased by 70 percent to account for the benefit packages and to account for overhead (OAQPS Cost Manual), which results in an hourly wage of \$14.50 per hour. For the managerial hours, a base rate of \$31.10 per hour was used. This rate is from the United States Department of Labor, Bureau of

Labor Statistics, A Table 10. Private industry, by occupational and industry group, @ December 2002. The rate was increased by 70 percent to account for the benefit packages and to account for overhead (OAQPS Cost Manual), which results in an hourly wage rate of \$52.87 per hour.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs. Dry cleaning facilities must use a handheld instrument to conduct leak detection on a monthly basis. Major sources must use a PCE gas analyzer (photo ionization detector (PID), flame ionization detector, or infrared analyzer) to perform leak checks according to Method 21 on a monthly basis, while area sources may use a halogenated hydrocarbon leak detector (HHD), which is less expensive than the gas analyzer required for major sources. Capital/startup costs include the purchase of the respective monitor and operation and maintenance costs include the annualized cost of the monitor. In addition, sources will incur costs for photocopying and mailing reports. These costs are summarized in the following table.

**Capital/Startup vs. O&M Costs**

(A) Item	(B) Startup cost for one affected facility	(C) Number of affected facilities	(D) Total startup (BxC)	(E) Annual O&M costs for one affected facility	(F) Number of affected facilities with O&M	(G) Total O&M (ExF)
PID	\$3,300.00	12	\$39,600	\$95.00	12	\$1,140
HHD	\$250.00	20,000	\$5,000,000	\$14.00	20,000	\$280,000
Photo-copying	-	-	-	\$1.20	20,000	\$24,000
Total			\$5,039,600	Total		\$305,140

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs. The capital/startup costs are one-time costs when a

facility becomes subject to the final revisions. Major source facilities will purchase a PCE gas analyzer and area sources would purchase a halogenated hydrocarbon leak detector. The annual operation and maintenance costs are the ongoing cost to maintain the monitors. Other costs include photocopying.

Capital/startup cost for this ICR is \$5,039,600. This is the total of column D in the above table. The total operation and maintenance (O&M) cost for this ICR is \$305,140. This is the total of column G.

The total 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 \$5,344,740.

**6(c) Estimating Agency Burden and Cost.**

There is no new information to be reported as a result of these final revisions to the dry cleaning NESHAP. The only costs to EPA are those costs associated with examination of records to be maintained by the respondents that will occur as part of the periodic inspection of sources, which is part of EPA=s overall compliance and enforcement program. Therefore, there is no additional burden to EPA.

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

The EPA estimates approximately 28,000 dry cleaning facilities are affected by the final revisions to the dry cleaning NESHAP. Of those, 8,000 are located in States that already have an enhanced monitoring program that is similar to this propose revision. Therefore, no additional burden is calculated for those facilities and the respondent universe for this ICR is 20,000 existing sources. Twelve of those are major sources. This ICR documents only the additional monitoring and

recordkeeping requirements in the final amendments to the dry cleaning NESHAP.

The number of total respondents is 20,000. The average number of respondents remains steady over the three-year period, as 2,330 PCE dry cleaning facilities are replaced each year. The total annual labor costs are \$3,960,354. This number is not shown on the OMB 83-I form. Details upon which this estimate is based appear in Table A1: Annual Industry Burden - 2006 Revisions to NESHAP for Perchloroethylene Dry Cleaning Facilities - 40 CFR part 63, subpart M.

The total annual capital/startup and O&M costs are \$5,344,740. 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.**

The adjustment in burden from the most recently approved ICR is due to the final revisions to the dry cleaning NESHAP. The number of respondents (20,000) has been revised to be consistent with the final revisions to the dry cleaning NESHAP.

**6(g) Burden Statement.**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average approximately twelve 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 established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2005-0155, which is available for online viewing and [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room B-102, 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. An electronic version of the public docket is available at [www.regulations.gov](http://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, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2005-0155 and OMB Control Number XXXX-XXXX 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](http://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.

ATTACHMENT A

TABLE A1

Table A1: Annual Industry Burden - 2006 Revisions to NESHAP for Perchloroethylene Dry Cleaning Facilities - 40 CFR part 63, subpart M

**Table A1. Annual Industry Burden - 2006 Revisions to NESHAP for Perchloroethylene Dry Cleaning Facilities - 40 CFR part 63, subpart M**

Burden Item	(A) Hours per Occurrence	(B) Occurrences Respondent/ Year	(C) Hours Respondent /Year (AxB)	(D) Respondents /Year	(E) Mgmt Hours/ Year (CxD)x0.05a	(F) Tech Hours/ Year (CxD)X 0.95b	(G) Employee Hours/ Year (E+F)	(H) Cost \$/Year
<b>1. Applications</b>	Not Applicable							
<b>2. Survey and Studies</b>	Not Applicable							
<b>3. Reporting requirements</b>								
A. Read Instructions	1	1	1	20,000 <sup>c</sup>	1,000	19,000	20,000	\$328,370
B. Required activities	Not Applicable							
C. Create Information	Not Applicable							
D. Gather existing information								
- Initial report information	Current NESHAP			d				\$0
- Solvent consumption	Current NESHAP			d				\$0
- Compliance method report	Current NESHAP			d				\$0
E. Write Report								
- Initial notification report	Current NESHAP			d				\$0
- Compliance method report	Current NESHAP			d				\$0
- Solvent Consumption Report	Current NESHAP			d				\$0
- Report: Exceed Consumption Cutoff	Current NESHAP			d				\$0
<b>4. Recordkeeping requirements</b>								
A. Read Instructions	Included in 3A							

**Table A1. Annual Industry Burden - 2006 Revisions to NESHAP for Perchloroethylene Dry Cleaning Facilities - 40 CFR part 63, subpart M**

Burden Item	(A) Hours per Occurrence	(B) Occurrences Respondent/ Year	(C) Hours Respondent /Year (AxB)	(D) Respondents /Year	(E) Mgmt Hours/ Year (Cx D)x0.05a	(F) Tech Hours/ Year (Cx D)X 0.95b	(G) Employee Hours/ Year (E+F)	(H) Cost \$/Year
B. Plan activities	1	1	61	20,000c	1,000	19,000	20,000	\$328,370
C. Implement activities								
- Major: Weekly leak detection/repair	Current NESHAP			d				\$0
- Area: Biweekly leak detection/repair	Current NESHAP			d				\$0
- Major: Enhanced leak detection/repair	4	12e	48	12c	29	547	576	\$9,465
- Area: Enhanced leak detection/repair	0.75	12f	f	20,000c	9,000	171,000	180,000	\$2,955,330
D. Develop record system								
- Solvent consumption	Current NESHAP			d				\$0
- Enhanced leak detection/repair	1	1	1	20,000c	1000	19,000	20,000	\$328,370
E. Time to enter information								
- Records of solvent consumption	Current NESHAP			d				\$0
- Major: Records of weekly inspections	Included in 4C							\$0
- Area: Records of biweekly inspections	Included in 4C							\$0
- Major: Enhanced Leak detection/repair	Included in 4C							\$0
- Area: Enhanced leak detection/repair	Included in 4C							\$0
F. Time to Train personnel	Not Applicable							

**Table A1. Annual Industry Burden - 2006 Revisions to NESHAP for Perchloroethylene Dry Cleaning Facilities - 40 CFR part 63, subpart M**

Burden Item	(A) Hours per Occurrence	(B) Occurrences Respondent/ Year	(C) Hours Respondent /Year (AxB)	(D) Respondents /Year	(E) Mgmt Hours/ Year (CxD)x0.05a	(F) Tech Hours/ Year (CxD)x 0.95b	(G) Employee Hours/ Year (E+F)	(H) Cost \$/Year
G. Time for audits	Not Applicable							
<b>TOTALS</b>					12,029	228,547	240,576	\$3,949,905

- a Assume that management hours are 5 percent 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," <http://www.bls.gov/oes/2002/oes516011.htm>. The wage rate obtained from the table has been increased by 70 percent to account for overhead (payroll and facility (OAQPS manual)).
- b Assume that technical hours are 95 percent of the employee hours unless otherwise noted. The technical labor rate of \$8.53 for dry cleaners employees was obtained from the United States Department of Labor, Bureau of Labor Statistics, September 2002, "Table 10. Private Industry, by occupational and industry group," <http://www.bls.gov/oes/2002/oes516011.htm>. The wage rate obtained from the table has been increased by 70 percent to account for overhead (payroll and facility (OAQPS manual)).
- c Approximately 28,000 existing area sources and 12 existing major sources are subject to the proposed dry cleaning NESHAP. Approximately 8,000 existing area sources are located in States that already require enhanced monitoring.
- d Included in the previous ICR.
- e Major sources contain an average of four machines. Task requires 1 hour times 4 machines/major source.
- f Area sources contain an average of one machine. Monthly inspections (12 months/year) times (1 machine/area source)

