

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for New Residential Wood Heaters

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA) (Renewal)

1(b) Short Characterization/Abstract

The New Source Performance Standard (NSPS) was proposed on February 18, 1987, and promulgated on February 26, 1988. These standards apply to each wood heater manufactured on or after July 1, 1988, or sold at retail on or after July 1, 1990. Wood heaters manufactured on or after July 1, 1990, or sold at retail on or after July 1, 1992, must meet more stringent emission standards. Approximately 54 manufacturers, 875 retailers, and 5 certification laboratories are currently subject to the regulations. No increase is expected in those estimates over the next three years. Particulate matter (PM) is the pollutant regulated under the standards.

Two features of this rulemaking which are unique to the NSPS program require emphasis at the outset. First, these standards were negotiated by representatives of groups affected by the NSPS, including those groups which are burdened by the information collection activities. None of these activities were judged to be unreasonable by these representatives. Some of these provisions were recommended by the affected groups as a means of promoting an efficient and smooth running certification and enforcement program. Second, these regulations established a certification program instead of the usual NSPS requirement that each affected facility demonstrates compliance through New Source Review and testing. Under this certification program, a single wood heater is tested to demonstrate compliance for an entire model line, which could consist of thousands of stoves. The certification approach significantly reduces the compliance burden, including information collection for the manufacturers of wood heaters. Because of the potential risks to the environment from the intentional or accidental misuse of the certification approach, there were, however, several safeguards included, some of which entail reporting and recordkeeping.

Under this regulation, wood heater manufacturers, testing laboratories, and retailers are required to submit reports to the Environmental Protection Agency (EPA) and/or to maintain records for demonstrating compliance with the NSPS.

The information supplied by the manufacturer to the Agency is used: (1) to ensure that best demonstrated technology is being applied to reduce emissions from wood heaters; (2) to ensure that the wood heater tested for certification purposes is in compliance with the applicable emission standards; (3) to provide assurance that nontested production model heaters have emission performance characteristics similar to tested models; and (4) to provide an indicator of continued compliance.

Information supplied to the Agency by testing laboratories is used to grant or deny laboratory accreditation, and to assist in enforcement and compliance activities. Information requested by the Agency from manufacturers is used to determine compliance with requirements that are based upon volume of production.

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (ICR) without any “Terms of Clearance” (TOC).

The burden to the “Affected Public” may be found in Table 1; (Annual Respondent Burden and Cost, NSPS for New Residential Wood Heaters, (40 CFR part 60, subpart AAA) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractor and refer to Table 2: Annual Agency Burden and Cost, NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA) (Renewal).

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 four years.

In the Administrator's judgment, pollutant emissions from wood heaters cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS was promulgated for this source category at 40 CFR part 60, subpart AAA.

2(b) Practical Utility/Users of the Data

The control of pollution from new residential wood heaters (i.e., wood stoves) relies on the reduction of particulate matter emissions by proper wood heater design. A representative unit for each certified model line is tested for particulate emissions. The manufacturer also conducts periodic quality assurance inspections and emissions tests to ensure that wood heaters manufactured subsequent to the initial certification test continue to comply with the NSPS. Manufacturers must recertify their wood heater model lines every five years.

The required notifications are used to inform the Agency or delegated authority when a new model line is expected to be tested. The reviewing authority may then observe the testing operation, if necessary. Emission test reports are needed as these are the Agency's record of a model line's initial capability to comply with the emission standard, and to serve as a record of the operating conditions under which compliance was achieved.

Adequate 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.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 60, subpart AAA.

3(a) Nonduplication

The NSPS has not been delegated to state agencies or EPA regional offices. All reports are sent directly to the EPA headquarters. Therefore, no duplication in reporting 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 58853) on October 5, 2006. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The EPA concludes that the average cost wood heater manufacturers pay to laboratories to conduct certification testing increased from \$7,500 per test to \$10,000 per test since the last ICR was published. This increase is based on information received from Richard Sparwassar from Omni Environmental Services, an EPA-accredited wood heater testing laboratory. His phone number is: (503) 643-3788.

Additionally, the number of respondents increased from 50 to 54. These figures are based on consultations with John Crouch from the Hearth, Patio and Barbecue Association (HPBA). His phone number is: (916) 536-2390. Industry statistical information received from HPBA was also used to determine the number of respondents.

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

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

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. The retention of records for five years allows 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.

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

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards are 3433, 3631, and 8734 which correspond to the North American Industry Classification System (NAICS) codes 333414, 335221, and 541380 for source category description.

4(b) Information Requested

All data in this ICR that is recorded and/or reported is required by the NSPS for New Residential Wood Heaters 40 CFR part 60, subpart AAA.

Manufacturers, testing laboratories and retailers/distributors of new residential wood heaters must make the following reports:

(i) Data Items

All data in this ICR that is recorded and/or reported is required by the NSPS for New Residential Wood Heaters 40 CFR part 60, subpart AAA.

Manufacturers, testing laboratories and retailers/distributors of new residential wood heaters must make the following reports:

Reports for NSPS subpart AAA	
The reporting requirements for NSPS subpart AAA were uniquely designed for the manufacturers, testing laboratories and retailers/distributors of new residential wood heaters. A special table is attached that describes the requirements in detail. See Table A. Respondent Reporting and Recordkeeping, NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA).	See Table A

Recordkeeping for NSPS subpart AAA	
The recordkeeping requirements for NSPS subpart AAA were uniquely designed for the manufacturers, testing laboratories and retailers/distributors of new residential wood heaters. A special table is attached that describes the requirements in detail. See Table A. Respondent Reporting and Recordkeeping, NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA).	See Table A

Electronic Reporting

No special automated, mechanical, or technical collection techniques are used to collect information.

The reports that are submitted by the manufacturer to EPA either are very voluminous (e.g., the application for model line certificate) or performed infrequently. Therefore, the electronic submission of such reports is not considered economically viable.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Manufacturers must obtain a certificate of compliance for each model line of wood heater to be manufactured/sold and conduct quality assurance activities.

Respondent Activities
Laboratories must install, calibrate, maintain, and operate the appropriate equipment and demonstrate their proficiency at performing the required tests (emission, burn rate and air-to-fuel ratio).
Retailers/distributors must maintain sale records of used wood heaters.
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 the 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.

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	
The Agency activities for NSPS subpart AAA are in response to a uniquely designed rule. A special table is attached that describes the requirements in detail. See Table B. Agency Activities, NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA).	See Table B

5(b) Collection Methodology and Management

All reports are sent directly to the Agency. Data obtained during periodic visits by Agency personnel from records maintained by the respondents are tabulated and published for internal Agency use in compliance and enforcement programs.

Information contained in the reports is systematically filed at EPA headquarters. Portions of the data are entered into a special database program maintained exclusively by the Agency for later retrieval, study and essential reports.

Public access to the wood heater database can be obtained by writing to the Agency. Reports of wood heaters currently certified are commonly requested by retailers and the general public.

Records required by this NSPS must be retained by the owner or operator for five years.

5(c) Small Entity Flexibility

Virtually all of the manufacturers, laboratories, and commercial owners affected by this proposed regulation are considered small businesses based on the definition used by the Small Business Administration. Special efforts taken by the Agency to minimize burden to these respondents are summarized elsewhere in this supporting statement.

Since this rule was developed through the regulatory-negotiation process, industry representatives directly participated in the writing of the rule and agreed to make all of the required reports and keep the appropriate records as specified in the rule.

Additional efforts were taken by the Agency to reduce the burden imposed on the smallest businesses affected by this regulation. Provisions were included which allow delayed compliance of up to one year for those manufacturers producing fewer than 2,000 wood heaters per year. In addition, less frequent quality assurance emission audits were required for those manufacturers that produce fewer than 2,500 wood heaters within a model line. The wood heater standards also allow small manufacturers to purchase a certified design from another manufacturer. In this case, no certification testing is required. This provision has significantly reduced the burden associated with certification process for small manufacturers of wood heaters.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1. Annual Respondent Burden and Cost, NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA).

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 each of the subparts 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.

The information collection under this rule is consistent and compatible, to the maximum

extent practicable, with the respondents existing reporting or recordkeeping practices. Since the last ICR, there are no new rule requirements that would require the respondent to adjust their existing recordkeeping or reporting from previously applicable instructions. 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 over the next three years from these recordkeeping and reporting requirements is estimated to be 9,728 hours. These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the wood heater NSPS program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

This ICR uses a Technical Labor Rate of \$64.13 per hour, a Managerial Labor Rate of \$93.04 and a Clerical Labor rate of \$39.65. This rate is from the United States Department of Labor, Bureau of Labor Statistics, June 2003, "Table 10. Private industry, by occupational and industry group." The rate is from column 1, "Total compensation." These rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

Managerial	\$93.04	(\$44.33 + 110%)
Technical	\$134.67	(\$64.13 + 110%)
Clerical	\$39.65	(\$18.88 + 110%)

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Data Collection Device	(B) Capital/Startup for One Respondent	(C) Number of New Respondents	(D) Total Capital/ Startup Cost (B X D)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M (E X F)
Sampling Trains	\$6,500	0	0	\$500	5	\$2,500
Certification Test ^a	\$10,000	72	\$720,000	0	0	0
Cost of Permanent Label ^b	\$2	162,000	\$324,000	0	0	0

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Data Collection Device	(B) Capital/Startup for One Respondent	(C) Number of New Respondents	(D) Total Capital/ Startup Cost (B X D)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M (E X F)
Removable Label Purchase/ Printing Cost ^c	\$0.75	162,000	\$121,500	0	0	0
QA Emissions Test ^d	\$7,500	24	\$180,000	0	0	0
Totals			\$1,345,500	\$	5	\$2,500

^a Each of the 54 manufacturers is assumed to pay \$10,000 per certification test for four tests over three years (1.33 tests per year). $1.33 \times 54 = 72$. This cost is assumed to include the cost incurred by the laboratory to seal the certified stove. There are essentially no burden hours associated with this cost.

^b Total costs of permanent labeling are estimated at \$2.00 per stove. There are essentially no burden hours associated with this cost. There are an expected 3,000 new woodstoves produced annually per manufacturer ($3,000 \times 54 = 162,000$).

^c Removable labels estimated to cost \$0.75 per label. There are an expected 3,000 new woodstoves produced annually per manufacturer ($3,000 \times 54 = 162,000$).

^d Assumes an emissions test is performed once every 5,000 units and since 750 units are produced each year for each model, 0.15 emission tests are performed annually per manufacturer per model. Each manufacturer has three models, therefore .45 emissions tests per manufacturer will be conducted ($0.15 \times 3 = 0.45$). There are 54 manufacturers ($.45 \times 54 = 24$).

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

The total capital/startup costs for this ICR are \$1,345,500 (column D). The number of new respondents above includes the number of new residential wood heaters manufactured per year.

The total operation and maintenance (O&M) costs for this ICR are \$2,500. This is the total of column G.

The total respondent costs are (i.e., \$1,348,000) have been calculated as the addition of the capital/startup costs and the annual operation and maintenance costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such 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 \$258,177. This cost is based on the average hourly labor rates in the table below. The labor rates incorporate a 1.6 benefits multiplication factor to account for government overhead expenses.

Managerial	\$53.22	(GS-13, Step 5, \$33.26 x 1.6)
Technical	\$39.49	(GS-12, Step 1, \$24.68 x 1.6)
Clerical	\$21.38	(GS-6, Step 3, \$13.36 x 1.6)

These rates are from the Office of Personnel Management (OPM) “2003 General Schedule” which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2. Annual Agency Burden and Cost, NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA).

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

Based on our research for this ICR, approximately 934 respondents are currently subject to the standard. It is estimated that no additional sources per year will become subject to the regulation in the next three years.

Number of respondents is calculated using the following table which addresses the three years covered by this ICR.

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) 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	59	875	0	934
2	0	59	875	0	934
3	0	59	875	0	934
Average	0	59	875	0	934

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

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 934.

The number of respondents has increased from 59 in the previous ICR to 934 in this ICR due to the inclusion of 875 respondents that keep records but do not submit reports.

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

Total Annual Responses					
(A) Number of New Respondents	(B) Number of Reports for New Respondents	(C) Number of Existing Respondents ¹	(D) Number of Reports for Existing Respondent s	(F) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(A \times B)+(C \times D)+F$
0	0	59	3.2	0	189

The number of Total Annual Responses is 189.

It should be noted that the number of responses in the previous ICR (i.e., 3,093) is significantly different from the number of responses in this ICR (i.e., 189). The previous ICR counted each data point collected as a response instead of the number of reports submitted plus the number of respondents that do not keep records. In this ICR, the correct number of responses is shown.

The total annual labor costs are \$615,367. Details regarding these estimates may be found in Table 2: Annual Agency Burden and Cost, NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA).

Note that the total annual capital and O&M costs to the regulated entity are \$1,348,000. Total annualized cost requested. These costs are detailed in Section 6(b)(iii), Capital/Startup vs. Operation 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 as Table 1. Annual Respondent Burden and Cost, NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA). The annual public reporting and recordkeeping burden for this collection of information is estimated to average 51 hours per response.

(i) Respondent Tally

The total annual labor hours are 9,728. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost, NSPS for New Residential Wood Heaters. (Attached.) Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 51 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$1,348,000. 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 6,704 labor hours at a cost of \$258,177. See Table 2. Annual Agency Burden and Cost, NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA). (Attached.)

6(f) Reasons for Change in Burden

There is no change in the labor hours or cost in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Second, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden.

Since there are no changes in the regulatory requirements and there is no significant industry growth, the labor hours and cost figures in the previous ICR are used in this ICR and there is no change in burden to industry.

Note that there is a small adjustment to the capital/startup and O&M costs to adjust for the rounding-off of figures in the previous ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 51 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 of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA's 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-OECA-2006-0770. 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), EPA West, Room 3334, 1301 Constitution Avenue, 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. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance docket and Information 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-OECA-2006-0770 and OMB Control Number 2060-0161 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 A
Respondent Reporting and Recordkeeping
NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA) (Renewal)

Regulatory Reference Title 40, Part 60	Regulated Entity	Reporting/Recordkeeping Requirement	Frequency/Other Comments
60.533(f)(1)	Manufacturer	<u>Report</u> : notification of certification testing at least 30 days prior to test	Once per model
60.533(b)	Manufacturer	<u>Report</u> : Application for certification. Includes identifying characterization results and various affirmations of compliance.	Once for each model line for each phase of the standard (unless wood date, complete certification test heater qualifies for Phase II stand). Must reapply every 5 years.
60.537(f)	Manufacturer	<u>Report</u> : To EPA certifying that model line is unchanged.	Every 2 years.
60.536(a)	Manufacturer	<u>Report</u> : Produce and apply permanent label	One per unit produced.
60.536(i)	Manufacturer	Produce and apply removable label.	One per unit produced.
60.536(l)	Manufacturer	Develop and publish owners manual.	One per unit produced.
60.533(o)(3)	Manufacturer	<u>Report</u> : Notify EPA that a Q.A. emissions test will be conducted within one week of the mailing of the notice. submit test report for accelerated Q.A. [(o)(3)(iii)]*	Once for each Q.A. emission test.
60.537(a)(2)	Manufacturer	Maintain records of all certification data.	Once per model.

Regulatory Reference Title 40, Part 60	Regulated Entity	Reporting/Recordkeeping Requirement	Frequency/Other Comments
60.533(o) & 60.537(a)(3), (a)(4)	Manufacturer	Recordkeeping of results, remedial measures taken pursuant to quality assurance program.	Parameter inspections every 150 units. emission tests vary according to manufacturer size and certification results.
60.537(a)(5)	Manufacturer	Maintain records of the number of wood heaters sold each year.	Continuously through production year.
60.537(g)	Manufacturer	Recordkeeping for all models and units exempted under R and D provision.	Variable unpredictable.
60.537(c)	Manufacturer	Retain sealed wood heater for the life of the model	One for each certified model
60.533(i)*	Manufacturer	<u>Report</u> : Request for waiver of testing requirement for certification testing	Once per model, if at all.
60.533(h)(3)**	Manufacturer	<u>Report</u> : Application for alternative certification.	Once per model, if at all.
60.533(k)(l)	Manufacturer	<u>Report</u> : Request for waiver of the requirement that a model line be recertified when changes exceed specified tolerances.	Variable
60.533(p)(5)**	Manufacturer	Development of documentation to rebut presumption of audit failure.	Variable, but no more than one for every four certified models.
60.535(a)(l)	Laboratory	<u>Report</u> : application for accreditation	One per laboratory.
60.535(b)(5)	Laboratory	<u>Report</u> : Proficiency test and all test documentation.	At time of application and annually.
60.535(b)(3)	Laboratory	Keep records of audit tests	Once for each five certification tests

Regulatory Reference Title 40, Part 60	Regulated Entity	Reporting/Recordkeeping Requirement	Frequency/Other Comments
60.534(e)(1)(3)	Laboratory	<u>Report</u> : To EPA changes in testing schedule or interruptions in testing.	Once per test.
60.537(b)(1)	Laboratory	Maintain records of certification test data	Once per certified model.
60.535(g)	Laboratory	Recordkeeping. Seal each certified wood heater.	Once per certified model.
60.533(h)(4)	Laboratory	<u>Report</u> : Submission of preliminary test reports from laboratory to EPA and manufacturer for wood heaters which exceed emission limits. Report is submitted within 10 days of test completion. (This provision for wood heaters which have been granted alternative certification, only.)	Once per model, if at all.
60.537(h)	Commercial Owner (e.g., retailer)	Name and address of previous owner of a used stove that he has purchased or obtained as a trade in.	Variable.

* This is associated with an exemption or waiver (which would eliminate other reporting and recordkeeping burdens) and, therefore, is not counted as a burden in the calculation.

** This is not a routine report. It is a provision for an extraordinary circumstance and, therefore, is not included in the calculations because it is very unlikely to occur during the next 3 years.

**Table B
Agency Activities**

NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA) (Renewal)

Regulatory Reference Title 40, Part 60	Agency	Reporting/Recordkeeping	Frequency/Other Comments
60.533(1)(2)*	EPA	<u>Report</u> : Notice of revocation of certification	Once per model, if at all.
60.533(p)(5)(B)	EPA	Issue notification of audit test failure and certificate suspension or revocation.	Variable, but no more than one for every four certified models.
60.535(b)	EPA	Evaluate laboratory proficiency tests.	Annually
60.535(e)*	EPA	Notice of intention to revoke laboratory accreditation with justification and basis.	Variable and infrequent.
60.539*	Manufacturer EPA	Various requests, submittals, motions, filings, etc. under hearing and appeal procedures.	

* This is not a routine report. It is a provision for an extraordinary circumstance and, therefore, is not included in the calculations because it is very unlikely to occur during the next 3 years.

Table 1. Annual Respondent Burden and Cost, NSPS for New Residential Wood Heaters,
(40 CFR part 60, subpart AAA) (Renewal)

Burden Items	Wood Heater Regulation Citation	(A) ^a	(B)	(C) ^a	(D)	(E) ^a	(F)	(G)	(H)	
		Person Hours Per Occurrence	Number Of Occurrences Per Respondent Per Year	Technical Person Hours Per Respondent Per Year (C=AxB)	Respondents Per Year	Technical Person Hours Per Year (E=CxD)	Management Person Hours Per Year Ex5%	Clerical Person Hours Per Year Ex10%	Cost Dollars Per Year	
Manufacturers - Reporting Requirements										
1) Certification Test Notification ^b	60.533(f)(1) & 60.534(e)	2	1.33	2.66	54	143.6	7.2	14.4	\$10,449.38	
2) Application For Certification ^c	60.533(b)	8	1.33	10.64	54	574.6	28.7	57.6	\$41,801.64	
3) Biennial Reporting For Certified Models ^d	60.537(f)	2	0.50	1.00	54	54.0	2.7	5.4	\$3,928.34	
4) Labeling Labor Cost Removable Label ^e	60.536(i)	0.0083	3000	24.9000	54	1,344.60	67.2	134.5	\$97,815.62	
5) Owner's Manual ^f	60.536(l)	20	1.00	20.00	54	1,080.00	54	108	\$78,566.76	
6) Q.A. Emission Test Notification ^g	60.533(o)(3)	2	0.80	1.60	54	86.4	4.3	8.6	\$6,285.34	
Manufacturers - Recordkeeping Requirements	60.537(a)									
1) Test Documentation ^h	60.537(a)(1,2)	1	1.33	1.33	54	71.8	3.6	7.2	\$5,224.69	
2) Q.A. Parameter Inspections ⁱ	60.537(a)(3)	2	20.00	40.00	54	2,160.0	108	216	\$157,133.52	
3) Sales Data ^j	60.537(g)	0	0.00	0.00		0	0	0		
4) R&D Stoves Report ^k	60.537(g)	2	1.00	2.00	54	108	5.4	10.8	\$7,856.68	
5) Retained Stoves ^l	60.537(c)	8	1.33	10.64	54	575	28.7	57.5	\$41,797.52	
		Subtotals For Manufacturing Burden					6,198	310	620	\$450,859

Table 1. Annual Respondent Burden and Cost, NSPS for New Residential Wood Heaters,
(40 CFR part 60, subpart AAA) (Renewal)

Burden Items	Wood Heater Regulation Citation	(A) ^a	(B)	(C) ^a	(D)	(E) ^a	(F)	(G)	(H)	
		Person Hours Per Occurrence	Number Of Occurrences Per Respondent Per Year	Technical Person Hours Per Respondent Per Year (C=AxB)	Respondents Per Year	Technical Person Hours Per Year (E=CxD)	Management Person Hours Per Year Ex5%	Clerical Person Hours Per Year Ex10%	Cost Dollars Per Year	
Laboratories - Reporting Requirements ^m										
1) Application For Accreditation	60.535(a)(1)	40	1.00	40.00	1	40	2	4	\$2,909.88	
2) Proficiency Test-Accreditation	60.535(b)(5)	135	1.00	135.00	1	135	7	13.5	\$9,820.85	
3) Notice of Proficiency Test ⁿ	60.535(b)(5)	1	2.00	1.00	1	1	0	0.1	\$72.75	
4) Annual Proficiency Test ^o	60.535(b)(7)	135	1.00	135.00	5	675	33.8	67.5	\$49,104.23	
5) Rescheduling Of Proficiency Test ^p	60.534(e)(1)	2	2.00	4.00	5	20	1	2	\$1,454.94	
1) Certification Test Runs ^q	60.537(b)(1)	4	52	208.00	5	1,040	52	104	\$75,656.88	
			Subtotals For Laboratory Burden				1,911	96	191	\$139,019.52
Retailers - Recordkeeping										
1) Used Stoves ^r	60.537(h)	0.1	4.00	0.40	875	350	18	35	\$25,461.45	
		Totals for hourly labor rates					8,459.0	423.0	845.9	\$615,366.87
		Totals For All Manufacturing, Laboratory and Retailer Burden Items					9,728 Hours			\$615,367 (rounded)

NOTES FOR TABLE 1

^aPlease note: numbers shown in columns (A), (C), and (E) are in person-hours. It was necessary to make several general assumptions regarding 1) how wood heater manufacturers would respond to the various alternatives for compliance and 2) the large variety of wood heater manufacturer size and marketing approaches. Using data from EPA's Section 114 survey of manufacturers, the following assumptions were developed for this burden calculation:

- 1) 54 woodstove manufacturers
- 2) 200 woodstove models
- 3) 4 woodstove models per manufacturer
- 4) 750 woodstoves produced annually for each model by each manufacturer
- 5) 3,000 woodstoves produced annually by each manufacturer
- 6) 150,000 woodstoves produced each year by all manufacturers

^bAssumes that during the next three years of the woodstoves NSPS, the typical manufacturer will require four Phase II certification tests over the three year period. Thus, four notices in three years equals 1.33 notices per year.

^cSee footnote b.

^dBiennial reporting equals 0.50 occurrences/year.

^eRemovable labels estimated to require 30 seconds to apply per wood heater.

^fTwenty hours required to include requisite information in owner's manual.

^gAssumes an emissions test is performed once every 5,000 units and since 750 units are produced each year for each model, 0.15 emission tests are performed annually per manufacturer per model. Since each manufacturer has three models, 0.8 emissions tests per year, per manufacturer will be conducted ($0.15 * 3 = 0.45$).

^hSee footnote b.

ⁱAssumes that 750 units per model year are produced, and that one out of every 150 units undergoes a parameter inspection. Thus, a parameter inspection will occur approximately five times per year per manufacturer per model. Since each manufacturer has four models, 20 parameter inspections will be conducted annually for each manufacturer.

^jNo additional burden because manufacturers already keep track of sales data for marketing purposes and payment of income taxes.

^kAssumes one report filed by each manufacturer annually.

^lSee footnote b.

^mAssumes that one new laboratory will apply for accreditation each year.

ⁿAn average of two notifications per proficiency test is assumed due to test cancellation and rescheduling.

^oAnnual proficiency tests. It is assumed that for each laboratory applying for accreditation, another laboratory will not renew their accreditation; therefore, there is no net increase in the number of laboratories from year to year and the number of respondents remains constant at four.

^pEach laboratory is required to report to EPA changes in the testing schedule or interruptions in testing that last more than 24 hours. It is assumed that two of these events will occur for each test.

^qLaboratories are expected to spend 4 hours per week to update and maintain records on certification tests.

^rOne-tenth of the estimated 8,751 wood heater retailers are assumed to buy and sell used wood stoves. These 875 retailers are each assumed to purchase four used stoves per year and to spend six minutes per purchase maintaining records of each used wood heater purchase.

Table 2: Annual Agency Burden and Cost, NSPS for New Residential Wood Heaters
(40 CFR part 60, subpart AAA) (Renewal)

Report Type		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
		Person Hours Per Occurrence	Number Of Occurrences Per Respondent Per Year	Technical Person Hours Per Respondent Per Year (C=AxB)	Respondents Per Year	Technical Person Hours Per Year (E=CxD) (\$39.49)	Management Person Hours Per Year (Ex5%) (\$53.22)	Clerical Person Hours Per Year (Ex10%) (\$21.38)	Cost in Dollars in Per Year
Response To Applicability Determination ^b		4	1.00	4.00	5	20.0	1.0	2.0	\$885.78
Manufacture Certification Notification & Changes ^c	60.533(f)(1) & 60.534(e)	2	2.67	5.34	54	288.4	14.4	28.8	\$12,771.18
Certification Test ^d	60.533(n)	40	0.13	5.20	54	280.8	14.0	28.1	\$12,436.35
Apply For Certification of Model Line ^e	60.533(b)	60	1.33	79.80	54	4,309.2	215.5	430.9	\$190,850.16
Biennial Reporting For Certified Models ^f	60.537(f)	2	0.50	1.00	54	54	2.7	5.4	\$2,391.61
Laboratory Application For Accreditation ^g	60.535(a)(1)	40	1.00	40.00	1	40	2	4	\$1,771.56
Laboratory Proficiency Test Notice - Accreditation ^h	60.535(b)(5)	2	1.00	2.00	1	2	0.1	0.2	\$88.58
Laboratory Proficiency Test Notice - New Lab Accreditation ⁱ	60.535(b)(5)	25	1.00	25.00	1	25.0	1.3	2.5	\$1,107.23
Laboratory Proficiency Test Report - Annual ^j	60.535(b)(7)								
a) Test Design and Implementation		80	1.00	80.00	1	80.0	4.0	8.0	\$3,543.12
b) Test Observation		40	0.25	10.00	5	50.0	2.5	5.0	\$2,214.45
c) Review of Test Reports		20	1.00	20.00	5	100.0	5.0	10.0	\$4,428.90

Table 2: Annual Agency Burden and Cost, NSPS for New Residential Wood Heaters
(40 CFR part 60, subpart AAA) (Renewal)

Report Type	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person Hours Per Occurrence	Number Of Occurrences Per Respondent Per Year	Technical Person Hours Per Respondent Per Year (C=AxB)	Respondents Per Year	Technical Person Hours Per Year (E=CxD) (\$39.49)	Management Person Hours Per Year (Ex5%) (\$53.22)	Clerical Person Hours Per Year (Ex10%) (\$21.38)	Cost in Dollars in Per Year
d) Analysis / Conclusions	40	1.00	40.00	1	40.0	2.0	4.0	\$1,771.56
Parameter Inspections ^k	40	0.25	10.00	54	540.0	27.0	54.0	\$23,916.06
		Totals For All Burden Items (sum)			5,829.4	291.5	582.9	\$258,176.53
		Total hours			6704			

NOTES FOR TABLE 2

^aIt was necessary to make several simplifying assumptions regarding 1) how wood heater manufacturers would respond to the various alternatives for compliance and 2) the large variety of wood heater manufacturer size and marketing approaches. The following assumptions were developed for renewal of this ICR:

- 1) 54 wood heater manufacturers
- 2) 200 wood heater models
- 3) 4 wood heater models per manufacturer
- 4) 750 wood heaters produced annually for each model by each manufacturer
- 5) 3,000 wood heaters produced annually by each manufacturer
- 6) 150,000 wood heaters produced each year by all manufacturers

^bTen percent of the wood heater manufacturers will request a determination of applicability once per year.

^cEach manufacturer will require four EPA certification tests over the next three years for an average of 1.33 certification tests per manufacturer per year. Each certification test is assumed to result in two schedule changes requiring notification. This doubles the occurrences per respondent from 1.33 to 2.67.

^dAssumes that there will be 1.33 certifications per manufacturer per year (see footnote c) and that EPA will send an observer to one out of every ten certification tests.

^eSee footnote c.

^fBiennial reporting equals 0.50 occurrences/year.

^gAssumes that one new lab will apply for accreditation each year.

^hTo receive accreditation, each laboratory will be required to perform a proficiency test one time during each year.

ⁱSee footnote g.

^jLaboratory proficiency test reports will consist of four parts. The first part, test design and implementation, is assumed to require 80 hours once per year to evaluate. The second part, test observation, assumes that EPA will send an observer to one-fourth of all tests. The third part, review of test reports, assumes that each laboratory will submit a report and that each report will require 20 hours to review. The fourth part, analysis and conclusions, is assumed to take 40 hours once per year.

^kRandom compliance audits to inspect wood heater parameters are expected to be conducted on one-quarter of each manufacturer's model lines per year.