

**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 last amended on September 22, 1993. The last amendments added additional requirements to implement a monthly leak detection and repair (LDAR) program using handheld instruments. These standards apply to each dry cleaning facility that uses PCE. This information is being collected to assure compliance with these and other requirements at 40 CFR part 63, subpart M.

Approximately 28,000 area sources are currently subject to the standard. Of those, 8,000 are located in states (California, Maine, New York, Rhode Island) that already require an enhanced LDAR program similar to the last NESHAP revisions. Therefore, an existing 20,000 area 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. There are 12 existing major sources subject to the regulation, and no new major sources are expected.

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/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 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 were promulgated for this source category at 40 CFR part 63 subpart M.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

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.

Subsequent 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 its 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 (74 FR 32581) on July 8, 2009. No comments were received.

3(c) Consultations

For this renewal, EPA accessed the Online Tracking Information System (OTIS) to verify the estimate of total number of affected facilities. NAICS codes 812332, 812310, and 812320 were queried.

Also for this renewal, EPA contacted representatives of industry trade organizations to request a voluntary opinion as to the accuracy of the burden estimates associated with this ICR and whether there is any way to reduce the burden. Halogenated Solvents Industry Alliance, Inc. (HSIA) stated: "HSIA has not identified any concerns regarding the burden estimates in this ICR." (Paul Dugard, telephone: 703-741-5780). Drycleaning & Laundry Institute (DLI, formerly International Fabricare Institute) stated:

The Drycleaning & Laundry Institute generally agrees with EPA's assessment regarding the renewal of the Information Collection Request (ICR) for the Perchloroethylene Dry Cleaning Facilities NESHAP. While it is very difficult to track the true burden for small area source drycleaners, DLI generally agrees with EPA's estimates. The record keeping and reporting requirements for [perchloroethylene] drycleaners has been in existence since September 22, 1996. The revised 2006 NESHAP for [perchloroethylene] drycleaners did increase the burden for area sources by including an enhanced leak detection program. However, EPA minimized the burden by allowing for the use halogenated leak detectors, which can be readily purchased for approximately \$250 per unit.

DLI's primary concern with the ICR is that it does not take into account state mandates that significantly increase the total burden on the drycleaning industry, including time, effort and lack of financial resources. Ultimately, the additional time needed to

comply with state and local mandates significantly increase the burden to small business. (Jon Meijer, telephone: 301-622-1900.)

DLI's primary concern that this ICR does not include the burden of state mandates that increase the total burden on the dry cleaning industry is valid concern to the industry. However, the purpose of this ICR is to address the burden imposed by implementing 40 CFR Part 63, Subpart M, a federal regulation. Any additional burden imposed by independently promulgated or enacted state requirements is not to be included.

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 proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by the OMB under 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. 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.

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 (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/NAICS Codes

Respondents are existing dry cleaning facilities that use PCE. There are 12 major source dry cleaning facilities (NAICS 812332), 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.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded 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 notifications and reports:

Notifications and Reports for 40 CFR part 63, subpart M	
Initial notifications	63.324(a)
Initial report requirements	63.324(a)
Notification of Compliance Status	63.324(b) and 63.324(f)
Facility status change	63.324(c)
Exceedence of solvent consumption exemption level.	63.324(c)

A source must keep the following records:

Recordkeeping for 40 CFR part 63, subpart M	
Monthly enhanced LDAR	63.322(o)
Date of repairs or purchase orders for repairs	63.324(d)(4)
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)

Recordkeeping for 40 CFR part 63, subpart M	
All reports and notifications.	63.10(b)
Record of applicability.	63.10(b)(3)

Electronic Reporting

Currently, 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.

Also, regulatory agencies in cooperation with the respondents, continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Complete monthly 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.
Install, calibrate, maintain, and operate control device and LDAR instruments.
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.

Currently, 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 exceedances of solvent combustion levels, emissions reports, PCE solvent combustion levels, and compliance status reports required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Air Facility System (AFS).

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 AFS which is operated and maintained by the EPA Office of Compliance. AFS is the EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the 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/operator for five years.

5(c) Small Entity Flexibility

Affected facilities are primarily small entities (e.g., small businesses). According to the Federal Register Notice for the 2006 final rule (71 FR 42742), "... over 99 percent of commercial dry cleaning firms are small." When developing the 2006 revisions, EPA took

special steps to ensure that the burden imposed on small entities was reasonable. The 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 “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. 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 1: Annual Respondent Burden and Cost 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 1,531,851. (Total Labor Hours from Table 1). The recordkeeping hours shown in Table 1 are 1,516,647. The reporting requirement hours shown in Table 1 are 15,204. 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 the following labor rates:

Managerial \$114.77 (\$54.65 + 110%)

Technical \$97.59 (\$46.47 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2009, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry. Dry cleaning facilities do not typically have clerical labor, so these ICR labor costs assume that all reporting is divided between managerial and technical staff.

(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 perchloroethylene 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 for new area sources include the purchase of the respective monitor and operation and maintenance costs include the annualized cost of the monitor. There are no new major sources expected in the next three-year ICR period.

The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage. Annual Operation and Maintenance (O&M) costs for the monitors apply to both new and existing sources because these costs are incurred each year. For the 8,000 area source facilities that are in states that already require an enhanced LDAR program, this ICR does not estimate capital and annual O&M costs for the monitors. The annual costs for postage are applied to new sources and sources with exceedances that must submit reports. All other existing sources must only keep records, and, as such, an annual photocopying charge is assessed for all sources keeping records. These costs are summarized in the table below.

(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 regulation. Major source facilities would purchase a perchloroethylene 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 and other costs such as photocopying and postage for submitting reports.

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Item	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (BxC)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M (E X F)
PID	\$3,300.00	0	0	\$95.00	12	\$1,140
HHD	\$250.00	2,330	\$582,500	\$14.00	20,000	\$280,000
Initial notification & compliance report	-	-	-	\$6.37	2,330	\$14,842
Report exceed consumption cutoff	-	-	-	\$6.00	117	\$702
Photocopying	-	-	-	\$2.40	28,012	\$67,229
					TOTAL	\$353,913

The total capital/startup costs for this ICR are \$582,500. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$353,913. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$936,413. These are recordkeeping 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 \$243,856 (see Table 2).

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

Managerial	\$61.36 (GS-13, Step 5, \$38.35 + 60%)
Technical	\$45.52 (GS-12, Step 1, \$28.45 + 60%)
Clerical	\$24.64 (GS-6, Step 3, \$15.40 + 60%)

These rates are from the Office of Personnel Management (OPM), 2009 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for

the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden.

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

Based on our research for this ICR, on average over the next three years, approximately 28,012 existing respondents will be subject to the standard. It is estimated that an additional 2,330 respondents (area sources) per year will become subject; but that the overall number of facilities will remain constant due to the retirement of old existing facilities. The overall average number of respondents, as shown in the table below, is 28,012 per year.

The number of respondents is calculated using the following table that 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	(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)
3-year Average	2,330	0	25,682	0	28,012

As shown above, the average Number of Respondents over the three-year period of this ICR is 28,012

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

Respondent Universe and Number of Responses Per Year						
Regulation Citation	(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
40 CFR Part 63, Subpart M						
Write Initial Notification Report	2,330	1	25,682	0	25,682	28,012
Compliance Method Report	1,631	1	N/A	0	N/A	1,631
Solvent Consumption Report	699	1	N/A	0	N/A	699

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
Report Exceed Consumption Cutoff	117	1	N/A	0	N/A	117
					TOTAL	30,459

The number of Total Annual Responses is 30,459.

The total annual labor costs are \$149,772,225. Details regarding these estimates may be found below in Table 1. Annual Respondent Burden and Cost.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$936,413. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The average annual Agency cost over next three years is estimated to be \$243,875. See Table 2. Annual Agency Burden and Cost.

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2 below, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 1,531,851. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 50 hours per response.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$936,413. 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 cost over next three years is estimated to be \$243,875. See Table 2. Annual Agency Burden and Cost.

6(f) Reasons for Change in Burden

In this ICR, the burden has increased somewhat due to a revision to the standard. However, this increase is more than offset by a decrease in burden associated with a reduction in the number of respondents. Therefore, the overall burden has decreased for this renewal.

The revision to the standard requires owners and operators of major and area sources to conduct enhanced LDAR and keep monthly records of enhanced LDAR events. Owners and operators would incur the capital/startup cost of purchasing the monitors, plus ongoing annual operation and maintenance costs of those instruments. In the previous ICR renewal, there were no capital/startup costs and operation and maintenance (O&M) costs as required by the revision to the standard. Section 6(b)(iii), of this ICR includes capital/startup cost of new facilities purchasing monitoring equipment, plus ongoing annual operation and maintenance costs of those instruments for all affected facilities.

In the previous ICR renewal, there was a larger estimated respondent universe. Based on more recent data as presented in the 2006 rule update ICR, there are fewer affected facilities: 28,012 versus 32,000 as previously estimated.

U.S. Census data show 32,000 dry cleaners nationwide. The 2006 background document for the update of the NESHAP for Perchloroethylene (PCE) Dry Cleaning Facilities estimates that approximately 85% of the dry cleaners use PCE. Based on this estimate, approximately 28,000 are subject to the NESHAP for Perchloroethylene Dry Cleaning Facilities.

The data in OTIS is incomplete for the dry cleaning industry due to the large number of area sources (e.g., small facilities). OTIS is designed to track major sources. The best estimate available is from the rule update ICR in 2006.

There is also a reduction the capital/startup and O&M costs. In the previous ICR addressing a revision to the standard, a large number of respondents were required to purchase monitoring equipment. For this renewal, only new respondents must purchase monitors. Therefore, the capital/startup and O&M costs are reduced.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 50 hours (rounded) 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 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-2009-0386. 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 docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0386 and OMB Control Number 2060-0234 in any correspondence.

Part B of the Supporting Statement

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

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

Burden Item	A Hours per Occurrence	B Number of occurrences per respondent per year	C Hours per respondent per year (AxB)	D Respondent s per year	E Management hours per year ^a	F Technical hours per year ^b	G Employee hours per year (E+F)	H Total cost per year (\$)
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read Instructions	1	1	1	2,330 ^c	2,330 ^e	0.00	2,330.00	267,414.10
B. Required activities	N/A							
C. Create Information	N/A							
D. Gather existing information								
Initial report information	2	1	2	2,330 ^c	233.00	4,427.00	4,660.00	458,772.34
Solvent consumption	1	1	1	2,330 ^c	116.50	2,213.50	2,330.00	229,386.17
Compliance method report	1	1	1	1,631 ^d	81.55	1,549.45	1,631.00	160,570.32
E. Write Report								
Initial notification report	1	1	1	2,330 ^c	116.50	2,213.50	2,330.00	229,386.17
Compliance method report	1	1	1	1,631 ^d	1,631 ^e	0.00	1,631.00	187,189.87
Solvent consumption report	0.25	1	0.25	699 ^g	174.75 ^e	0.00	174.75	20,056.06
Report-exceed consumption cutoff	1	1	1	117 ^h	116.5 ^e	0.00	117.00	13,428.09
<i>Reporting Subtotal</i>							15,204 (rounded)	1,566,203.12
4. Recordkeeping Requirements								
A. Read Instructions	Included in 3A							
B. Plan activities	1	1	1	2,330 ^c	0.00	2,330 ⁱ	2,330.00	227,384.70
C. Implement activities								
Above consumption cutoff: Weekly LDAR	0.75	52 ^j	39	19,608 ⁿ	0.00	764,727.60 ⁱ	764,727.60	74,629,766.48
Below consumption cutoff: Bi-weekly LDAR	0.75	26 ^k	19.5	8,404 ⁿ	0.00	163,870.20 ⁱ	163,870.20	15,992,092.82

Burden Item	A Hours per Occurrence	B Number of occurrences per respondent per year	C Hours per respondent per year (AxB)	D Respondents per year	E Management hours per year ^a	F Technical hours per year ^b	G Employee hours per year (E+F)	H Total cost per year (\$)
Major: Monthly enhanced LDAR	1	48 ^q	48	12 ^o	28.80	547.20	576.00	56,706.62
Major: Weekly Carbon adsorber monitoring	0.25	208 ^r	52	12 ^o	31.20	592.80	624.00	61,432.18
Area: Monthly enhanced LDAR	0.75	12 ^s	9	20,000 ^p	9,000.00	171,000.00	180,000.00	17,720,820.00
D. Develop record system								
Solvent consumption	1	1	1	2,330 ^c	0.00	2,330 ⁱ	2,330.00	227,384.70
Enhanced LDAR	1	1	1	2,330 ^c	0.00	2,330 ⁱ	2,330.00	227,384.70
Monitoring records	1	1	1	1,631 ^d	0.00	1,631 ⁱ	1,631.00	159,169.29
Carbon adsorber monitoring records	1	1	1				0.00	0.00
E. Time to enter information								
Monthly records of solvent consumption	0.25	12 ^l	3	28,012 ^m	7.88 ^f	84,028.12	84,036.00	8,201,208.59
Above consumption cutoff: Records of weekly inspections	0.25	52 ^j	13	19,608 ⁿ	34.14 ^f	254,875.06	254,909.20	24,877,175.35
Below consumption cutoff: Records of bi-weekly inspections	0.25	26 ^k	6.5	8,404 ⁿ	0.00	54,623.40 ⁱ	54,623.40	5,330,697.61
Major: Enhanced LDAR	Included in 4C							
Major: Carbon adsorber monitoring	Included in 4C							
Area: Enhanced LDAR	Included in 4C							
F. Time to Train personnel								
Leak detection	1	2 ^t	2	2,330 ^c	2,330 ^u	2,330 ^u	4,660.00	494,798.80
G. Time for audits								
	N/A							
<i>Recordkeeping Subtotal</i>							1,516,647 (rounded)	148,206,021.84
TOTAL ANNUAL BURDEN							1,531,851	149,772,225

Assumptions:

- a. We have assumed that management hours are 5 percent of the employee hours unless otherwise noted. The management labor rate of \$114.77 was obtained from the United States Department of Labor, Bureau of Labor Statistics, March 2009, ATable 2. Civilian Workers, by occupational and industry group.@ The rate is from column 1, ATotal compensation.@ The base rate of \$54.65 was increased by 110 percent to account for the benefit packages available to those employed by private industry.
- b. We have assumed that technical hours are 95 percent of the employee hours unless otherwise noted. The technical labor rate of \$97.59 was obtained from the United States Department of Labor, Bureau of Labor Statistics, March 2009, ATable 2. Civilian Workers, by occupational and industry group.@ The rate is from column 1, ATotal compensation.@ The base rate of \$46.47 was increased by 110 percent to account for the benefit packages available to those employed by private industry.
- c. We have assumed that there are 28,000 existing cleaners and that 2,330 cleaners will leave the industry and will be replaced by 2,330 new dry cleaners.
- d. This is based on the estimate that 1,631 (70 percent) of the 2,330 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. This is based on the estimate that 699 (30 percent) of the 2,330 new facilities will be below the cutoff and thus required to perform this task.
- h. It is estimated that 5 percent of new 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. We have assumed that facilities below cutoff performs leak detection and repairs on a bi-weekly basis.
- l. Occurrences are based on twelve months rolling average of PCE/perchloroethylene consumption, determined once per month.
- m. This is based on 28,000 facilities performing this task every year.
- n. We have assumed that of 28,000 perchloroethylene dry cleaners 19,608 (70 percent) will be above the per consumption cutoff, which will require that the cleaner conduct weekly leak detection and repair. The remaining 8,404 perchloroethylene dry cleaners are below the consumption cutoff and are only required to conduct bi-weekly leak detection and repair.
- o. Approximately 28,000 existing area sources and 12 existing major sources are subject to the NESHAP.
- p. Approximately 8,000 existing area sources are located in states that already require enhanced monitoring.
- q. Major sources contain an average of four machines. Task requires 1 hour times 4 machines/major source.
- r. Major sources contain an average of four machines. Task requires 0.25 hour times 4 machines/major source.
- s. Area sources contain an average of one machine. Task requires 0.75 hour times 1 machine/area source.
- t. Estimates includes hours for training, one owner/operator and one employee.
- u. 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 \$45.52	(D) Mgmt hrs/ hour/year \$61.36^e	(E) Clerical hrs/ Year \$24.64^e	(F) EPA COST/ Year
Report Review						
New Plant ^a						
Initial notification report	1	2,330	2,330	116.5	233	118,951.16
Solvent consumption report ^b	1	699	699	34.95	69.9	35,685.35
Report-exceed consumption cutoff ^c	1	117	117	5.85	11.7	5,973.08
Compliance method report ^d	1	1,631	1,631	81.55	163.1	83,265.81
Total Burden and Cost			5,493.55			\$243,875.40

Assumptions:

- a. These agency rates are from the Office of Personnel Management (OPM), 2009 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
- b. Area sources consuming less than 140 gallons of perchloroethylene per year: 30 percent of total number of new sources.
- c. Assume that 5 percent of new sources will have to report-exceed consumption cutoff.
- d. Area sources consuming between 140 to 200 gallons of perchloroethylene per year: 70 percent of total number of new sources.
- e. Management hours and clerical hours amount to 5 percent and 10 percent, respectively, of the technical hours.