

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Halogenated Solvent Cleaning (40 CFR Part 60 Subpart T) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) (Renewal),
EPA ICR Number 1652.07, OMB Control Number 2060-0273

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning was promulgated on December 2, 1994 (59 FR 61805), and amended to the final standards published June 5, 1995 (60 FR 29485), and December 11, 1998 (63 FR 68400). These standards apply to the following facilities in 40 CFR subpart T, batch vapor or in-line cleaning machines, and batch cold cleaning machines. This information is being collected to assure compliance with 40 CFR part 63, subpart T.

Respondents are owners or operators of solvent cleaning machines using any solvent containing methylene chloride (MC), perchloroethylene (PCE), 1,1,1-trichloroethane (TCA), trichloroethylene (TCE), carbon tetrachloride (CT), chloroform (C), or any combination of these halogenated solvents in a concentration greater than 5 percent by-weight. This includes batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machines.

Owners or operators of a batch vapor or in-line cleaning machine subject to this regulation must choose between an equipment/work practice standard and a solvent emission limit standard in order to comply. All respondents must submit an initial report for applicability determination and an initial statement of compliance that delineates the compliance alternative chosen for each solvent cleaning machine, and how the requirements are being met. To meet the equipment standards, respondents must install and monitor specific control device combinations listed in the regulation, or they must monitor the idling emission control parameters that they have established. If the respondents choose to install a control combination listed in the regulation, they must maintain quarterly, monthly, or weekly control device monitoring records based on the type of control device installed as specified in the regulation, and installation dates of each cleaning machine and its control devices. The frequency of monitoring and recordkeeping of certain control device parameters is reduced if parameter compliance is consistent and increased when a parameter is exceeded.

Respondents choosing the idling emission option must perform an idling emission test on their solvent cleaning machines and monitor idling emission control parameters. Emission control parameters to be maintained and monitored must be established during the test. In most cases, this test will be completed by the manufacturer of the solvent cleaning machine. All respondents using idling emission parameter monitoring to demonstrate compliance must keep

records of the monitoring results, test results (if an idling emission test was required), and installation dates or certification of each cleaning machine and its control devices.

If the respondents choose the overall solvent emissions limit option, they must: 1) maintain a log of the dates and amounts of solvent additions and deletions, and the solvent composition of wastes removed; 2) calculate monthly emissions and rolling 3-month average emissions; and 3) maintain the calculation sheets showing how the emissions were determined. These records must be maintained for five years for each solvent cleaning machine.

Owners or operators of all batch vapor or in-line cleaning machines must submit to EPA: 1) an annual report of monitoring or solvent emission results; 2) a biannual exceedance report; and 3) a quarterly report if exceedances occur. The circumstances under which an exceedance of a monitored control parameter occurs under the equipment standard are outlined in the regulation. Some exceedances occur when a monitored parameter does not meet specified requirements within 15 days of the initial occurrence of an exceedance of a specified requirement. Other exceedances occur immediately upon the exceedance of a specified requirement. An exceedance of the overall solvent emissions limit occurs at the time when the emission limit is not met.

Owners or operators of batch vapor or in-line cleaning machines must maintain all control device monitoring or solvent consumption records on-site for five years. Owners or operators of batch vapor and in-line cleaning machines must retain records of installation dates of each machine and related equipment, owner's manuals, and any test reports for the life of the machine. For existing cleaning machines for which an operator or owner no longer has an owner's manual or any installation records, an owner or operator must provide and maintain certification that the machine and/or its controls were installed prior to the proposal date.

Owners or operators of batch cold cleaning machines have no recordkeeping requirements. Owners or operators of a batch cold cleaning machine must comply with an equipment standard and work practices. All respondents must submit an initial notification report and an initial statement of compliance.

Records and reports required by the NESHAP for halogenated solvent cleaners are necessary to enable EPA to identify sources subject to the standards and to ensure that the standards are being achieved. Records and reports must be maintained at the facility and/or submitted to EPA. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Approximately 1,431 sources are currently subject to the regulation, and no additional sources are expected to become subject to the standard in the next three years. The respondent labor and operation and maintenance (O&M) costs of this Information Collection Request (ICR) will be \$4,992,917 (rounded).

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

The burden to the “Affected Public” may be found below in Table 1(a): Annual Industry Burden - NESHAP for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) (Renewal). The burden to the “Federal government” is attributed entirely to work performed by federal employees or government contractors; this burden may be found below in both Table 1(b): Annual EPA Burden - NESHAP for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) (Renewal) for Batch Cold Cleaning Machines and Table 2: Annual EPA Burden - NESHAP for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) (Renewal).

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 (HAPs). These standards are applicable to new or existing sources of HAPs and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

- (A) Establish and maintain such records;
- (B) make such reports;
- (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods;
- (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe);
- (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical;
- (F) submit compliance certifications in accordance with Section 114(a)(3);
- and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from halogenated solvent cleaning machines either 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 T.

2(b) Practical Utility/Users of the Data

The control of emissions of pollutant from halogenated solvent cleaning machines requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of HAPs from halogenated solvent cleaners are the result of operation of the affected facilities. The subject standard is achieved by the reduction of HAPs emission using control technology and leak detection and repairs procedures.

The notifications required in the applicable regulations are used to inform the Agency or

delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the regulations are being met. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

The information generated by the monitoring, recordkeeping and reporting requirement described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate the control equipment in compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with the applicable regulations, 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. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under (40 CFR part 63, subpart T).

3(a) Non-duplication

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 (74 FR 38006) on July 30, 2009. No comments were received on the burden published in the Federal Register.

3(c) Consultations

In estimating the affected number of sources and the growth rate of halogenated solvent cleaning facilities subject to this standard during the previous renewal, EPA contacted Mr. Alton D. Romig, Environmental Consultant, at (610) 865-2284. During the previous renewal, we referenced the most recent ICR, consulted with the preparer of the active ICR, and used other resources to obtain the most recent data available. We reviewed information available from the Online Tracking Information System (OTIS) which is the primary source of information regarding the number of existing sources. OTIS data was used in conjunction with industry consultation to verify the number of sources and the industry growth rate.

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. 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

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 (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 respondents to the recordkeeping and reporting requirements are owners and operators of halogenated solvent cleaning machines. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standard are listed below. These correspond to the North American Industry Classification System (NAICS) codes listed below for source description.

Halogenated Solvent Cleaning (40 CFR part 63, subpart T)	SIC Codes	NAICS Codes
Lumber and Wood Products, Except Furniture		
Sawmills and wood preservation	2421	3211
Veneer, plywood, and engineered wood product manufacturing	2435	3212
Other wood product manufacturing	2499	3219
Furniture and Fixtures		
Household and institutional furniture and kitchen cabinet manufacturing	2514	3371
Office furniture (including fixtures) manufacturing	2522	3372
Other furniture related product manufacturing	2599	3379
Electronic and Other Electrical Equipment and Components, Except Computer Equipment		
Electric lighting equipment manufacturing	3648	3351
Household appliance manufacturing	3639	3352
Electrical equipment manufacturing	3699	3353
Other electrical equipment and component manufacturing	3699	3359
Transportation Equipment		
Motor vehicle manufacturing	3714	3361
Motor vehicle body and trailer manufacturing	3711	3362
Aerospace product and parts manufacturing	3761	3364
Ship and boat building	3731	3366
Railroad rolling stock manufacturing	3743	3365
Other miscellaneous manufacturing	3999	3399
Food and Kindred Products		
Animal food manufacturing	2048	3111
Grain and oilseed milling	2076	3112
Sugar and confectionery product manufacturing	2061	3113
Fruit and vegetable preserving and specialty food manufacturing	2034	3114
Dairy product manufacturing	2026	3115
Seafood product preparation and packaging	2092	3117
Bakeries and tortilla manufacturing	2051	3118
Other food manufacturing	2098	3119
Primary Metal Industries		
Iron and steel mills and ferroalloy manufacturing	3312	3311
Steel product manufacturing from purchased steel	3325	3312
Alumina and aluminum production and processing	3365	3313
Nonferrous metal (except aluminum) production and processing	3396	3314

Halogenated Solvent Cleaning (40 CFR part 63, subpart T)	SIC Codes	NAICS Codes
Foundries	3325	3315
Industrial and Commercial Machinery and Computer Equipment		
Agriculture, construction and mining machinery manufacturing	3531	3331
Industrial machinery manufacturing	3569	3332
Commercial and service industry machinery manufacturing	3567	3333
Ventilation, heating, air-conditioning, and commercial refrigeration equipment manufacturing	3564	3334
Metalworking machinery manufacturing	3545	3335
Engine, turbine, and power transmission equipment manufacturing	3511	3336
Other general purpose machinery manufacturing	3559	3339
Measuring, Analyzing, and Controlling Instruments; Photographic, Medical and Optical Goods; Watches and Clocks		
Navigational, measuring, electro-medical, and control instruments	3812	3345
Manufacturing and reproducing magnetic and optical media	3695	3346

4(b) Information Requested

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

(i) Data Items

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

A source must make the following reports:

Reports for 40 CFR part 63, subpart T	
Initial notification	63.09(b), 63.468(a)
Construction/reconstruction	63.05(d), 63.468(b)
Initial compliance report	63.09(h), 63.468(c)
Initial performance test results	63.10(d), 63.468(d)
Monitoring of control equipment	63.09(g), 63.468(d) (4)
Annual report on training operators and solvent emission	63.468(f), (g)

Reports for 40 CFR part 63, subpart T	
Semiannual and quarterly exceedance report	63.10(b), 63.468(h-i)

A source must keep the following records:

Recordkeeping for 40 CFR part 63, subpart T	
Maintain owner's manual or written maintenance and operating procedures.	63.10(b), 63.467(a), (a)(1)
Records of parametric monitoring data, system maintenance and calibration.	63.467(b)
Maintain records on method used to determine the cleaning capacity.	63.467(d)
Maintain records of initial performance test, which includes the idling emission rate and values of the monitoring parameters measured.	63.467(a)(4)
Records of halogenated HAP solvent for each solvent used in solvent cleaning machine.	63.467(a)(5)
Record of applicability.	63.10(b)(3)
All reports and notifications.	63.10(b)

Electronic Reporting

Some state 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. The estimated amount of electronic reporting is 10 percent.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, halogenated HAP solvents cleaning machines.
Perform initial performance test, Reference Method 18 test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.

Respondent Activities
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., halogenated HAP solvents. 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.

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
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Air Facility System (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. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

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 and annual emission inventory data for more than 100,000 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 or operator for

five years.

5(c) Small Entity Flexibility

According to the Final Rule (72 FR 25138): “The final rule is expected to affect 125 ultimate parent entities that will be regulated as major sources. Forty of the parent entities, or approximately one-third, are defined as small according to the SBA small business size standards.” Therefore, this ICR assumes that one-third of the affected facilities are small entities (e.g., small businesses). However, the impact on small entities was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the type of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Tables 1(a), 1(b), and 1(c): Annual Industry Burden for NESHAP for Halogenated Solvent Cleaners (40 CFR part 63, subpart T) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1(a), Table 1(b), and Table 1(c) document 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 41,035 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$114.77 (\$54.65 + 110%)
Technical	\$97.59 (\$46.47 + 110%)
Clerical	\$48.26 (\$22.98 + 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.

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

The types of industry cost associated with the information collection activities in the subject standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time cost when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/ Startup Cost (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Temperature monitoring device	\$2,700 ¹	0	0	\$860	1,180 ²	\$1,014,800

¹ The reason for zero capital/startup cost is due to a ruling that was promulgated in December 1994, stating that the existing sources were not required to comply with the standard after December 1997.

² The O&M only applies to the 1,180 batch vapor or in-line solvent cleaning machines, not the 251 batch cold solvent cleaners.

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

The total operation and maintenance (O&M) costs for this ICR are \$1,015,000 (rounded). This is the total of column G.

The average annual cost for capital/startup and operation and maintenance cost to industry over the next three years of the ICR is estimated to be \$1,015,000 (rounded).

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 \$325,437 (rounded) [see Table 2 in Section 6(e)]. Costs in the proposed ICR are based on the following labor breakdown:

Managerial	\$114.77 (\$54.65 + 110%)
Technical	\$97.59 (\$46.47 + 110%)
Clerical	\$48.26 (\$22.98 + 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.

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

Approximately 1,431 sources are currently subject to the regulation, and it is estimated that no additional sources per year will become subject to the regulation in the next three years.

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
Batch vapor or in-line cleaning machines (w/o exceedance)	0	0	1,062	2	0	2,124
Batch vapor or in-line cleaning machines (with exceedance)	0	0	118	4	0	472
Batch cold cleaning machines	0	0	251	0	251	251

The number of total respondents is 1,431. This represents the number of existing sources plus the number of new sources averaged over the three-year period (i.e., the total of the number of new respondents over the three-year period divided by three years).

The number of Total Annual Responses is 2,847. This is the number in column E of the Respondent Universe and Number of Responses Per Year table above.

The total annual labor costs are \$3,977,917 (rounded). Details regarding these estimates may be found below in Table 1(c). Annual Respondent Burden and Cost, NESHAP for Halogenated Solvent Cleaning/Halogenated Hazardous Air Pollutants (40 CFR part 63, subpart T) (Renewal).

Note that the total annual capital and O&M costs to the regulated entity are \$1,015,000 (rounded). 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. The annual public reporting and recordkeeping burden for this collection of information are estimated to average 14 hours per response.

6(f) Reasons for Change in Burden

There is no change in the labor hours in this ICR compared to the previous ICR. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for the respondents is very low, negative or non-existent. Therefore, the labor hours in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR.

There is an increase in both respondent and Agency costs resulting from labor rate increases from 2003 to 2009. This ICR uses 2009 labor rates because burden and cost calculations in Tables 1 and 2 of this ICR were expanded to include managerial and clerical labor rates, and the previous ICR only provided a technical labor rate for 2003. Therefore, this ICR is updated to present the most recent available labor rates for each of the three labor categories.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 14 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-2009-0531, which is available for online viewing at <http://www.regulations.gov>, or in person viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, N.W., Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1752. An electronic version of the public docket is available online at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0531 and OMB Control Number 2060-0273 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(a): Annual Industry Burden - NESHAP for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) (Renewal)

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
	Hours per Occurrence	Occurrences/ Respondent/ Year	Hours/ Respondent /Year	Respondents per Year	Total Hours per Year (E=CxD)	Managerial Hours/ Year ^b	Technical Hours/ Year ^b	Clerical Hours/ Year ^b	Cost per year ^a
Burden Item									
1. APPLICATIONS		N/A							
2. SURVEY AND STUDIES		N/A							
3. REPORTING REQUIREMENTS									
A. Read Instructions ^{c & d}	2	1	2	0	0	0	0	0	\$0
B. Gather existing information		Included in 3C							
C. Write Report									
Initial notification report ^d	1	1	1	0	0	0	0	0	\$0
Initial compliance report ^d	4	1	4	0	0	0	0	0	\$0
Performance test results ^{d & e}	30	1	30	0	0	0	0	0	\$0
Annual compliance report ^d	1.5	1	1.5	1,180	1,770	153.91	1539.13	76.96	\$171,582
Report with exceedance ^{g & h}	1	3	3	118	354	30.78	307.83	15.39	\$34,316
Report with no exceedance ^{g & i}	0.5	1	0.5	1,062	531	46.17	461.74	23.09	\$51,475
<i>Subtotal Reporting</i>					2,655				\$257,373
4. RECORDKEEPING REQUIREMENTS									
A. Read instructions		Included in 3A							
B. Plan activities ^j	1	1	1	393	393	34.17	341.74	17.09	\$38,097
C. Implement activities									
Performance test ^{e & f}	50	1	50	39	1,950	169.57	1695.65	84.78	\$189,031
Control device monitoring ^{k & l}	1.64	12	19.68	590	11,611.2	1009.67	10096.70	504.83	\$1,125,580
Solvent consumption log ^{m & n}	1.5	12	18	590	10,620	923.48	9234.78	461.74	\$1,029,494
D. Record Data									
Control device monitoring ^{l & o}	1.2	12	14.4	590	8,496	738.78	7387.83	369.39	\$823,595
Solvent emission calculation	0.75	12	9	590	5,310	461.74	4617.39	230.87	\$514,747
E. Time to train personnel ^p									
<i>Subtotal Recordkeeping</i>					38,380				\$3,720,543

TOTAL ANNUAL BURDEN (rounded)					<u>41,035</u>				\$3,977,917
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Assumptions:

- a. We assume a technical labor rate of \$97.59, managerial rate \$114.77, and clerical rate of \$48.26 from the United States Department of Labor, Bureau of Labor Statistics, March 2009, "Table 2. Civilian Workers, by occupational and industry group."
- Workers by Occupational and Industry Group. The rates are from column 1: Total compensation. The wage rate obtained from the table has been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- b. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.
- c. It is assumed that it will take 2 hours to read instructions.
- d. We assume that there will be no new sources.
- e. It is estimated that idling emission or dwell test reports require 70 technical hours and 10 managerial hours or $(87.5\% \times \$97.59/\text{hr} + 12.5\% \times \$114.77/\text{hr}) = \$106.18/\text{hr}$ average hourly rate). The hours were then divided between the test itself (50 hours) and the test report (30 hours).
- f. We assume that 1,180 facilities are required to complete the annual compliance report.
- g. The burden of one quarterly and one semiannual exceedance report was included in the burden estimate for the annual report.
- h. We assume that 10 percent of 1,180 facilities are in exceedance at least one time per year (quarterly reporting).
- i. We assume that 90 percent of 1,180 facilities are not in exceedance (semiannual reporting).
- j. One-time cost was based on 1,180 facilities averaged over three years (1,180/3years) for a total of 393 facilities.
- k. Actual monitoring is conducted weekly, monthly or quarterly for specific control devices. The estimated time was based on the typical control devices expected to be installed.
- l. We assume that 50 percent of the facilities will choose the standard equipment and will be required to conduct control device monitoring.
- m. We assume that 50 percent of the facilities will choose to do solvent consumption monitoring.
- n. This activity is assumed to be performed by a manager.
- o. We assume that it would take 1.2 hours per facility to record data.
- p. We assume that no special training requirements are required.

TABLE 1(b): Average Annual EPA Burden - NESHAP for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) For Batch Cold Cleaning Machines (Renewal)

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
	Hours per Occurrences	Occurrences Respondent/ Year	Hours Respondent/ Year	Respondents per Year	Hours per year (E=CxD)	Managerial Hours/Year ^b	Technical Hours/Year ^b	Clerical Hours/Year ^b	Cost per Year ^a
Burden Items									
1. APPLICATIONS		N/A							
2. SURVEYS AND STUDIES		N/A							
3. REPORTING REQUIREMENTS									
A. Read Instructions ^{b & c}	0.5	1	0.5	0	0	0	0	0	\$0
B. Gather existing information		Included in 3C							
C. Write Report ^{b & d}									
Initial notification report	0.25	1	0.25	0	0	0	0	0	\$0
Initial compliance report	0.25	1	0.25	0	0	0	0	0	\$0
<i>Subtotal Reporting</i>					0				\$0
4. RECORDKEEPING REQUIREMENTS		N/A							
<i>Subtotal Recordkeeping</i>		N/A							
SUBTOTAL ANNUAL HOUR					0				\$0

Assumptions:

- a. The cost at technical labor rate of \$97.59, managerial rate \$114.77, and clerical rate of \$48.26 from the United States Department of Labor, Bureau of Labor Statistics, March 2009, "Table 2. Civilian Workers, by Occupational and Industry group."
- b. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.
- c. Estimated number of new facilities with batch cold cleaning machines is zero.
- d. It is assumed that it will take 0.5 hours to read instructions.
- e. It is assumed that it will take 0.25 hours to write report.

TABLE 1 (c): Aggregate Burden for Burden Identified on Table 1(a) and 1(b)

	Activity	Person hours per respondent per year	Respondents per year	Total Hours per year	Total Cost per year
Ba	Batch Vapor and In-line Cleaning Machines (subtotal)	154	1,180	41,035	\$3,977,917
Ba	Batch Cold Cleaning Machines (subtotal)	1	0	0	0
T	TOTAL ANNUAL COST BURDEN (rounded)	155	1,180	41,035	\$3,977,917

TABLE 2: Average Annual EPA Burden - NESHAP for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) (Renewal)

	(A)	(B)	(C)	(D)	(E)	(F)
	EPA hrs Occurrence	Occurrences Per Year	Technical hrs/year ^a (C=AxB)	Management hrs/year ^a (D=Cx0.05)	Clerical hrs/year ^a (E=Cx0.1)	EPA Cost/year ^a
Burden Items						
Report Activity						
1. Batch vapor and in-line cleaning machine						
A Initial notification report ^b	1	0	0	0	0	\$0
B Initial compliance report ^b	2	0	0	0	0	\$0
C Performance test results ^{c & d}	8	0	0	0	0	\$0
D Annual compliance report ^e	2	1,180	2,360	118	236	\$255,245
E Report with exceedance ^{f & g}	1	118	118	5.9	11.8	\$12,762
F Report with no exceedance ^{f & h}	0.5	1,062	531	26.55	53.1	\$57,430
2. Batch Cold Cleaning Machines						
A Initial notification/compliance report ⁱ	0.25	0	0	0	0	\$0
TOTAL ANNUAL BURDEN^j			3,009	150.45	300.9	\$325,437

Assumptions:

- a. Costs are based on the following hourly rates: Technical at \$97.59, Management at \$114.77, and Clerical at \$48.26 from the United States Department of Labor, Bureau of Labor Statistics, March 2009, "Table 2. Civilian Workers, by occupational and industry group." Management person-hours and Clerical person-hours are assumed to be 5 percent, and 10 percent of technical person-hours respectively.
- b. It is assumed that a one-time cost was based on 393 facilities per year.
- c. We assume that it will take 8 hours to review performance test results.
- d. We assume that 50 percent of the facilities will choose the standard equipment; 20 percent of those will conduct one-time idling tests.
- e. All facilities are expected to submit annual compliance reports summarizing either solvent consumption data or monitoring results for each cleaning machine.
- f. The burden of one quarterly and one semiannual exceedance report was included in the burden estimate for the annual report.
- g. We assume that 10 percent of 1,180 facilities are in exceedance at least one time per year.
- h. We assume that 90 percent of 1,180 facilities are not in exceedance.
- i. It is assumed that there are 251 facilities with batch cold cleaning machines.
- j. To get total annual burden hours, add the totals from lines C, D, and E.