

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Wood Furniture Manufacturing Operations (40 CFR Part 63, Subpart JJ)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Wood Furniture Manufacturing Operations (40 CFR Part 63, Subpart JJ)
(Renewal)
EPA ICR 1716.06, OMB Control Number 2060-0324

1(b) Short Characterization/Abstract

The final National Emission Standards for Hazardous Air Pollutants (NESHAP) from Wood Furniture Manufacturing Operations were proposed on December 6, 1994, and promulgated on December 7, 1995. These standards apply to both existing wood furniture manufacturing operations and to new wood furniture manufacturing operations commencing construction, modification or reconstruction after the date of proposal that are major sources of hazardous air pollutants (HAPs). This information is being collected to assure compliance with the standard promulgated at 40 CFR part 63, subpart JJ.

Owners or operators of the affected facilities that are major sources must make one-time-only notifications including: notification of any physical or operational change to an existing facility which may increase the regulated pollutant emission rate; notification of the initial performance test, including information necessary to determine the conditions of the performance test, performance test measurements and results; and notification of demonstration of the continuous monitoring system (CMS). Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. Monitoring requirements specific to 40 CFR part 63, subpart JJ provide information on compliance with the rule. Semiannual reports are required for all sources. Some sources having excess emissions must submit quarterly reports. In general, these notifications, reports and records are required of all sources subject to 40 CFR part 63.

Owners or operators of the affected facilities that are incidental wood furniture manufacturers or area sources (incidental/area sources) must keep records to demonstrate that they are not major sources as defined in the standard.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Approximately 750 sources are currently subject to the standard, based on information provided by the American Furniture Manufacturers Association. Of these sources, approximately 300 are major sources and 450 are incidental/area sources. It is anticipated that no new facilities will come on-line over the next three years. It is assumed that there is an average of one affected facility per source.

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (ICR) with the following “Terms of Clearance.”

The assumptions underlying estimates of industry and agency burden and costs of the collection should be updated in the next renewal.

The industry and cost burden have been updated using rates from the United States Department of Labor, Bureau of Labor Statistics, March 2009, “Table 2. Civilian Workers, by Occupational and Industry group” and the Office of Personnel Management (OPM), 2010 General Schedule.

The wood furniture manufacturing operations consists of 750 facilities in the United States, which are all privately owned and operated. None of the 750 facilities in the United States are owned by either state, local, tribal or the Federal government.

The burden to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost - NESHAP for Wood Furniture Manufacturing Operations (40 CFR part 63, subpart JJ). The burden to the “Federal government” is attributed entirely to work performed by Federal employees or government contractors. This burden may be found in Table 2: Average Annual EPA Burden - NESHAP for Wood Furniture Manufacturing Operations (40 CFR part 63, subpart JJ).

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, hazardous emissions from wood furniture manufacturers 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 JJ.

2(b) Practical Utility/Users of the Data

The control of emissions from hazardous air pollutant emissions from wood furniture manufacturing operations require the installation of properly designed equipment and the operation and maintenance of that equipment. Emissions of HAPs from wood furniture manufacturers are the result of operation of the affected facilities. This standard relies on the reduction of hazardous air pollutants by the use of compliant or low HAP content coatings, or the use of control devices, or some combination of these three control technologies.

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 functioning properly. The required quarterly/semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures 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. Nonduplication, Consultations, and Other Collection Criteria

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

3(a) Nonduplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can

be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (74 FR 34583) on July 8, 2009. No comments were received on the burden published in the Federal Register.

3(c) Consultations

During a previous renewal of this ICR, consultations concerning the industry growth rate over the next three years and the burden costs of recordkeeping and reporting under the rule were conducted with the leading trade associations representing the industry, and the EPA Office of Air Quality Planning and Standards. The contacts were: 1) The American Furniture Manufacturing Association, Mr. David Purvis, (336) 884-5000; 2) The Business and Institutional Furniture Manufacturing Association, Mr. Tom Reardon, (616) 285-3963; and 3) the Office of Air Quality Planning and Standards.

The industry representatives indicated that no net growth in the industry was expected over the next three years. They cited foreign competition as having a negative effect on industry growth and modestly increasing residential/business demand for furniture as having a positive effect with a projected net growth rate of zero. In addition, any industry growth over the next three years could likely be absorbed by existing plants without any new source construction.

This rule was developed using the regulatory-negotiation process. The industry participated in the rulemaking process and agreed to comply with the final rule, so they have a good understanding of the recordkeeping and reporting burden. They did not mention any specific problems with the rule burden during the consultations.

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 wood furniture manufacturers. The United States Standard Industrial Classification (SIC) and the North American Industry Classification System (NAICS) codes for the respondents affected by the standards are shown below.

Standard	SIC Codes	NAICS Codes
40 CFR part 63, subpart JJ	2434	33711
	2511	337215
	2512	337121
	2517	337129
	2519	337125
	2521	337211
	2531	33636, 337127, 339942
	2541	337127, 337212, 337215
	2599	339111, 337127
	5712	337122

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 Wood Furniture Manufacturing Operations (40 CFR part 63, subpart JJ).

A source must make the following reports:

Reports for 40 CFR part 63, subpart JJ	
Notification of applicability.	63.807(a), 63.9(h)
Notification and application of construction or reconstruction.	63.807(a), 63.5(d)
Notification of anticipated date of initial startup.	63.807(a), 63.5(b), 63.9(b)
Notification of physical or operational change which may increase the emission rate.	63.807(a), 63.5(b)(6)
Notification of performance tests.	63.807(a), 63.17(b), (c), and (g), 63.8, 63.9(c), 63.10(d)(2)
Notification performance test results.	63.807(a), 63.8(e)(2), 63.9(g), 63.10(e)(2)
Notification of compliance status.	63.807(b), 63.9(h)

Reports	
Semiannual reports	63.807(c)
Quarterly reports	63.807(d)

A source must keep the following records:

Recordkeeping for 40 CFR part 63, subpart JJ	
Startup, shutdown or malfunctions and corrective action records.	63.806(a), 63.6(e), 63.10(b)(2)
Work practice standards implementation plan	63.806(e), 63.10(d)(1)
Work practice standards records	63.806(e), 63.10(b)(2)
Records of compliance monitoring system data	63.806(b)(2), 63.10(c), 63.6(e)
CMS quality control plan	63.807(a)
Startup, shutdown and malfunction plans.	63.807(a), 63.6(e)(3), 63.10(d)(5)
Records of the types and quantities of finishing/cleaning/adhesive materials	63.806(b), 63.10(b)(2)

Recordkeeping for 40 CFR part 63, subpart JJ	
Records monthly weighted-average emission calculations	63.806(a), 63.10(b)(3)
Records of applicability determination/area source status	63.806(a), 63.10(b)(3)
Records of performance test/evaluations	63.806(a), 63.10(b)(2)

Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., internal feed. 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. It is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test and repeat, if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way. 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, 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 (64 FR 31358):

The Agency has found that two of the twenty-one firms that potentially could be subject to the standards are small firms. Of the two, data indicate that one is an area source which would not be covered by the standards. The second source could be major and subject to the requirements of the standards. Information available to the Agency shows that the second source is able to achieve the control levels of the NESHAP using existing

equipment. The testing, monitoring, recordkeeping and reporting requirements are essentially identical to the current requirements and, thus, should cause little or no change in these burdens.

This ICR conservatively assumes that two of twenty-one ownership firms are small, and extrapolates this fraction to the affected facilities, assuming that approximately 9½ percent, or 71 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 in Table 1: Annual Industry Burden for NESHAP for Wood Furniture Manufacturing Operations (40 CFR part 63, subpart JJ).

6. Estimating the Burden and Cost of the Collection

Table 1 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. Wherever 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 47,189 (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 costs 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 costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor 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)
Several options available	0	0	\$0	\$600	30	\$18,000

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

The total operation and maintenance (O&M) costs for this ICR are \$18,000. 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 \$18,000.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA 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.

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

Managerial \$62.27 (GS-13, Step 5, \$38.92 + 60%)
 Technical \$46.21 (GS-12, Step 1, \$28.88 + 60%)

Clerical \$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2010 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.

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

Based on our research for this ICR, there are approximately 750 existing sources 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					
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)
1	0	300	450	0	750
2	0	300	450	0	750
3	0	300	450	0	750
Average	0	300	450	0	750

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 750.

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 JJ	0	0	300	2.01 ¹	450	1,053

¹ Weighted average of semiannual and quarterly reports (See Table 1. Annual Respondent Burden and Cost, NESHPAP for Wood Furniture Manufacturing Operations, 40 CFR part 63, subpart JJ) for details

The number of total respondents is 750.

The number of Total Annual Responses is 1,053. 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 \$4,438,012. Details regarding these estimates may be found in Table 1: Annual Industry Burden and Cost - NESHAP for Wood Furniture Manufacturing Operations (40 CFR part 63, subpart JJ), below.

6(e) Bottom Line Burden Hours 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, respectively, and summarized below.

6(f) Reasons for Change in Burden

There are no changes in the respondent 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 (with a correction for rounding) in this ICR. It should be noted that there is an apparent decrease of one hour in the total labor hours for this ICR. Total labor hours for this ICR are 47,189 rather than 47,190 as in the previous ICR. The previous ICR did not carryout decimal places for the calculations in Table 1.

There is an increase in both respondent and Agency labor costs resulting from labor rate increases from 2003 to 2009. In addition, Tables 1 and 2 were expanded to include managerial and clerical labor rates.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 45 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-2009-0380, which is available for online viewing at www.regulations.gov, or in person viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 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-2009-0380 and OMB Control Number 2060-0324 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 Respondent Burden and Cost – NESHAP for Wood Furniture Manufacturing Operations (40 C

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen person-hou per year (Ex0.05)
1. Applications for construction, reconstruction and modification ^{a, d, e}	4	1	4	39	156	7.8
2. Survey and studies	N/A					
3. Reporting Requirements						
A. Read instructions ^c	1	1	1	300	300	15
B. Create information	See 3D					
C. Gather existing information	See 3D					
D. Write reports						
Notification of construction/reconstruction ^d	2	1	2	9	18	0.9
Notification of modifications ^e (physical/operational changes)	8	1	8	30	240	12
Notification of anticipated startup (including reconstruction and modification)	2	1	2	39	78	3.9
Notification of actual startup	2	1	2	39	78	3.9
Semiannual compliance status reports ^f	4	2	8	270	2,160	108
Semiannual excess emissions reports ^g	4	2	8	29	232	11.6
Quarterly excess emissions reports ^h	4	4	16	2	32	1.6
List of types and quantities of materials used, including VHAP and solids content data	1.5	52	78	300	23,400	1,170
<i>Subtotal Reporting</i>						30,698
4. Recordkeeping requirements						
A. Read instructions	See 3A					
B. Plan activities	N/A					
C. Implement activities	N/A					
D. Time to enter information						
Record of operators completing training courses	1	2	2	300	600	30
Records of CMS parameters ⁱ	1.5	52	78	30	2,340	117
Records of types and quantities of materials used, including VHAP and solids common data	See 3D					
E. Records for incidental and area sources ^j	1	12	12	450	5,400	270
F. Annual personnel refresher course ^k	8	1	8	750	6,000	300
G. Time for audits	N/A					

<i>Subtotal Recordkeeping</i>		16,491
Subtotals Labor Burden and cost	41,034	2,052
TOTAL LABOR BURDEN AND COST (rounded)		47,189

Assumptions:

^a We assume that the average number of respondents that will be subject to the rule will be 750. Of these sources, approximately 300 are major incidental/area sources. There will be no additional new sources that will become subject to the rule over the three-year period of this ICR.

^b 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, March 2009, "Table 2. Civilian Workers, by Occupational and Industry group." Workers by Occupational and Industry Group. The rates are from compensation. The wage rate obtained from the table has been increased by 110 percent to account for the benefit packages available to those employees.

^c We have assumed that there will be 39 respondents (30 modified + 9 reconstructed) that will apply for construction, reconstruction and modification.

^d It is assumed that approximately 3 percent of the total number of major sources will apply for reconstruction of their facility (300x3=9).

^e It is assumed that 10 percent of the total number of major sources will apply for modification of their facility (300x10=30).

^f We have assumed that 90 percent of the affected sources will comply by using compliant coatings or by using the HAP averaging approach (300x90=270).

^g We have assumed that 10 percent of the affected facilities will comply by using control devices, but only 95 percent are assumed to be in compliance. The number of affected facilities submitting semiannual reports would be required to submit semiannual rather than quarterly reports; therefore, the number of affected facilities submitting semiannual report is (300x10%x95%=285 (rounded)).

^h We have assumed that the number of sources submitting quarterly reports is 2 [300x10%x5%=2 (rounded)].

ⁱ It is assumed that 10 percent of affected facilities will use control devices to comply (300x10%=30).

^J We have assumed that 450 incidental/area sources affected facilities will record information once per month.

^k It is assumed that all of the affected sources will participate in the annual personnel refresher source once per year.

Table 2: Average Annual EPA Burden - NESHAP for Wood Furniture Manufacturing Operations (40 CFR Part 63, Subpart JJ)

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) Technical person-hours per year (C=AxB)	(D) Management person-hours per year (Cx0.05)	(E) Clerical person-hours per year (Cx0.1)	(F) Cost, \$
Excess emissions enforcement activities						
Report Review						
A. Review notification of construction/reconstruction	2	9	18	0.9	1.8	\$1,900
B. Review notification of modifications (physical/operational changes) ^d	2	30	60	3	6	\$6,400
C. Review semiannual compliance status reports and certifications ^e	8	270	2,160	108	216	\$233,600
D. Review semiannual excess emission reports ^f	8	29	232	11.6	23.2	\$25,000
E. Review quarterly excess emission reports ^g	16	2	32	1.6	3.2	\$3,400
Subtotals Labor Burden and cost			2,502	125	250	\$270,600
TOTAL ANNUAL BURDEN AND COST (rounded)				2,877		\$270,600

Assumptions:

We have assumed that the average number of respondents that will be subject to the rule will be 750. Of these sources, approximately 300 are major sources and 450 are incidental/area sources. There will be no additional new sources that will become subject to the rule over the three-year period of this RFA.

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.

It is assumed that approximately 3 percent of the total number of major sources will apply for reconstruction of their facility (300x3=9).

It is assumed that 10 percent of the total number of major sources will apply for modification of their facility (300x10=30).

We have assumed that 90 percent of the affected sources will comply by using compliant coatings or by using HAP averaging approach (300x90%=270).

We have assumed that 10 percent of the affected facilities will comply by using control devices, but only 95 percent are assumed to be in compliance at any given time and would be required to submit semiannual rather than quarterly reports; therefore, the number of affected facilities submitting semiannual reports is 29 [300x10%x95%=29 (rounded)].

We have assumed that the number of sources submitting quarterly reports is 2 [(300x10%x5%=2 (rounded))].