

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (Renewal)
EPA ICR Number 1176.09, OMB Control Number 2060-0161

1(b) Short Characterization/Abstract

The New Source Performance Standard (NSPS) was proposed on February 18, 1987, and promulgated on February 26, 1988. These standards apply to each wood heater manufactured on or after July 1, 1988, or sold at retail on or after July 1, 1990. Wood heaters manufactured on or after July 1, 1990, or sold at retail on or after July 1, 1992, must meet more stringent emission standards. Particulate matter (PM) is the pollutant regulated under the standards.

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

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

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

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

Over the next three years, an average of 54 manufacturers, 875 retailers, and 5 certification laboratories, for a total of 934 are currently subject to the regulations, and it is estimated that no additional sources per year will become subject to the standard.

There are approximately 934 affected entities in the United States, which are all publicly owned and operated by the new residential wood heaters industry. None of the facilities in the United States are owned by either, state, local, tribal or the Federal government. They are all owned and operated solely by privately owned for-profit businesses. You can find the burden to the “Affected Public” listed below in Table 1: Annual Industry Burden and Cost - NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA). The Federal government burden associated with the review of reports submitted by the respondent is shown below in Table 2: Average Annual EPA Burden - NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA).

The active (previous) ICR had the following “Terms of Clearance (TOC):

As part of its submission, EPA should verify that the wage rate referenced in section 6(b) of the supporting statement have been updated to current values and properly loaded to include overhead, consistent with current EPA and OMB guidelines.

EPA has addressed the TOC. The wage rates referenced in Section 6(b) of the supporting statement have been updated to current values and properly loaded to include overhead, consistent with current EPA and OMB guidelines.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every

four years.

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

2(b) Practical Utility/Users of the Data

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

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

Adequate recordkeeping and reporting are necessary to ensure compliance with these standards as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also used for targeting inspections and is of sufficient quality to be used as evidence in court.

Nonduplication, Consultations, and Other Collection Criteria

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

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 (75 FR 30812) on June 2, 2010. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry is the Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based, in part, with our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we contacted the Omni Environmental Services at (503) 643-3788, and the Hearth, Patio and Barbecue Association (HPBA) at (916) 536-2390.

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 OMB under 5 CFR part 1320, section 1320.5.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/NAIC Codes

The respondents to the recordkeeping and reporting requirements are wood heaters. The United States Standard Industrial Classification (SIC) codes which correspond to the North

American Industry Classification System (NAICS) codes are listed below for each source category description.

40 CFR Part 60, Subpart AAA	SIC Codes	NAICS Codes
Heating Equipment (Except Warm Air Furnaces Manufacturing)	3433	333414
Household Cooking Appliance Manufacturing	3631	335221
Testing Laboratories	8734	541380

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

In this ICR, all the data recorded or reported is required by the NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA).

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

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

A source must keep the following records:

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

Electronic Reporting

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

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

(ii) Respondent Activities

Respondent Activities
Read instructions.
Manufacturers must obtain a certificate of compliance for each model line of wood heater to be manufactured or sold, and conduct quality assurance activities.
Install, calibrate, maintain, and operate the appropriate equipment and demonstrate their proficiency at performing the required test (emission, burn rate and air-to-fuel ratio).
Retailers/distributors must maintain sale records of used wood heaters.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., continuous parameter monitoring system). 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	
The Agency activities for NSPS subpart AAA are in response to a uniquely designed rule. A special table is attached that describes the requirements in detail. See Table B. Agency Activities, NSPS for New Residential Wood Heaters (40 CFR part 60, Subpart AAA)	See Table B

5(b) Collection Methodology and Management

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

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

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

The records required by this regulation must be retained by the owner or operator for five years.

5(c) Small Entity Flexibility

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

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

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

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden - NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (Renewal).

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. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 9,729 (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 NSPS 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	\$116.05 (\$55.26 + 110%)
Technical	\$97.21 (\$46.29 + 110%)
Clerical	\$48.87 (\$23.27 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2010, ATable 2. Civilian Workers, by occupational and industry group. @ The rates are from column 1, ATotal 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 type of industry costs associated with the information collection activities in the subject standard(s) 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(s) 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) Data Collection Device	(B) Capital/Startup for One Respondent	(C) Number of New Respondents	(D) Total Capital/ Startup Cost (B X D)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M (E X F)
Sampling Trains	\$6,500	0	0	\$500	5	\$2,500
Certification Test ^a	\$10,000	72	\$720,000	0	0	0
Cost of Permanent Label ^b	\$2	162,000	\$324,000	0	0	0
Removable Label Purchase/ Printing Cost ^c	\$0.75	162,000	\$121,500	0	0	0
QA Emissions Test ^d	\$7,500	24	\$180,000	0	0	0
Totals			\$1,345,500			\$2,500

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

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

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

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

The total capital/startup costs for this ICR are \$1,345,500. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$2,500. 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 \$1,348,000.

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.

The average annual Agency cost during the three years of the ICR is estimated to be \$302,107.

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: Average Annual EPA Burden - NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (Renewal).

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 934 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject to the standard over the three-year period of this ICR.

The 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 ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	59	875	0	934
2	0	59	875	0	934
3	0	59	875	0	934
Average	0	59	875	0	934

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

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

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

Total Annual Responses					
(A) Number of New Respondents	(B) Number of Reports for New Respondents	(C) Number of Existing Respondents ¹	(D) Number of Reports for Existing Respondents	(F) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(AxB)+(CxD)+F

Total Annual Responses					
0	0	59	3.2	0	189

The number of Total Annual Responses is 189.

The total annual labor costs are \$912,853. Details regarding these estimates may be found below in Table 1: Annual Industry Burden and Cost – NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (Renewal).

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.

(i) Respondent Tally

The total annual labor hours are 9,729. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 51 hours (rounded) per response.

The total annual capital/startup and Operation and Maintenance (O&M) costs to the regulated entity are \$1,348,000.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 6,704 labor hours at a cost of \$302,107. See below Table 2: Annual Agency Burden and Cost – NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (Renewal).

6(f) Reasons for Change in Burden

There is no increase in the number of affected facilities or the number of responses compared to the previous ICR. There has been no change in the regulation that would impact the burden during the next three years. EPA does keep track of wood heaters through the process of certification, recertification, and modification (subject to design changes). The actual number of sales is not governed by the regulations. There is however, an increase of one hour in the estimated labor burden hours as currently identified in the OMB Inventory of Approved Burdens, due to more precise calculation and rounding labor in the calculations. This increase is not due to any program changes. We also updated the labor rates, which resulted in an increase in labor costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 51 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; to 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; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of information; to search data sources; to complete and review the collection of information; and to 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-2010-0367. 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 content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search" than 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, N.W., Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center Docket 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, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2010-0367 and OMB Control Number 2060-0161 in any correspondence.

Part B of the Supporting Statement

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

Table A
Respondent Reporting and Recordkeeping
NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA) (Renewal)

Regulatory Reference Title 40, Part 60	Regulated Entity	Reporting/Recordkeeping Requirement	Frequency/Other Comments
60.533(f)(1)	Manufacturer	<u>Report</u> : notification of certification testing at least 30 days prior to test	Once per model.
60.533(b)	Manufacturer	<u>Report</u> : Application for certification. Include identifying characterization results and various affirmations of compliance	Once for each model line for each phase of the standard (unless wood date, complete certification test heater qualifies for Phase Ii stand). Must reapply every 5 years.
60.537(f)	Manufacturer	<u>Report</u> : To EPA certifying that model line is unchanged	Every 2 years.
60.536(a)	Manufacturer	<u>Report</u> : Produce and apply permanent label	One per unit produced.
60.536(i)	Manufacturer	Produce and apply removable label	One per unit produced.
60.536(l)	Manufacturer	Develop and publish owners manual	One per unit produced.
60.533(o)(3)	Manufacturer	<u>Report</u> : Notify EPA that a Q.A. emissions test will be conducted within one week of the mailing of the notice. Submit test report for accelerated Q.A. [(o)(3)(iii)]*	Once for each Q.A. emission test.
60.537(a)(2)	Manufacturer	Maintain records of all certification data	Once per model.
60.533(o) & 60.537(a)(3), (a)(4)	Manufacturer	Recordkeeping of results, remedial measures taken pursuant to quality assurance program	Parameter inspections every 150 units. Emission tests vary according to manufacturer size and certification results.
60.537(a)(5)	Manufacturer	Maintain records of the number of wood heaters sold each year	Continuously through production year.

Regulatory Reference Title 40, Part 60	Regulated Entity	Reporting/Recordkeeping Requirement	Frequency/Other Comments
60.537(g)	Manufacturer	Recordkeeping for all models and units exempted under R and D provision	Variable unpredictable.
60.537(c)	Manufacturer	Retain sealed wood heater for the life of model	One for each certified model.
60.533(i)*	Manufacturer	<u>Report</u> : Request for waiver of testing requirement for certification testing	Once per model, if at all.
60.533(h)(3)**	Manufacturer	<u>Report</u> : Application for alternative certification	Once per model, if at all.
60.533(k)(l)	Manufacturer	<u>Report</u> : Request for waiver of the requirement that a model line be recertified when changes exceed specified tolerances	Variable.
60.533(p)(5)**	Manufacturer	Development of documentation to rebut presumption of audit failure	Variable, but no more than one for every four certified models.
60.535(a)(l)	Laboratory	<u>Report</u> : application for accreditation	One per laboratory.
60.535(b)(5)	Laboratory	<u>Report</u> : Proficiency test and all test documentation	At time of application and annually.
60.535(b)(3)	Laboratory	Keep records of audit tests	Once for each five certification tests.
60.534(e)(l)(3)	Laboratory	<u>Report</u> : To EPA changes in testing schedule or interruptions in testing	Once per test.
60.537(b)(l)	Laboratory	Maintain records of certification test data	Once per certified model.
60.535(g)	Laboratory	Recordkeeping. Seal each certified wood heater	Once per certified model.
60.533(h)(4)	Laboratory	<u>Report</u> : Submission of preliminary test reports from laboratory to EPA and manufacturer for wood heaters which exceed emission limits. Report is submitted within 10 days of test completion. (This provision for wood heaters which have been granted alternative certification, only.)	Once per model, if at all.
60.537(h)	Commercial Owner (e.g., retailer)	Name and address of previous owner of a used stove that he has purchased or obtained as a trade in	Variable.

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

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

Table B
Respondent Reporting and Recordkeeping
NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA) (Renewal)

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

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

Table 1: Annual Respondent Burden and Cost - NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA (Renewal))

Burden 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) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
Reporting Requirements								
Manufacturers								
1. Certification test notification ^c	2	1.33	2.66	54	143.6	7.2	14.4	\$15,498.65
2. Application for certification ^c	8	1.33	10.64	54	574.6	28.7	57.4	\$61,992.64
3. Biennial reporting for certified models ^d	2	0.50	1	54	54	2.7	5.4	\$5,826.57
4. Labeling labor cost removable label ^e	0.0083	3,000	24.9	54	1,344.6	67.2	134.5	\$145,080.14
5. Owner's manual ^f	20	1	20	54	1,080	54	108	\$116,531.46
6. QA emission test notification ^g	2	0.80	1.6	54	86.4	4.3	8.6	\$9,318.23
Laboratories								
1. Application for accreditation ^h	40	1	40	1	40	2	4	\$4,315.98
2. Proficiency test accreditation ^h	135	1	135	1	135	7	13.5	\$14,595.44
3. Notice of proficiency test ⁱ	1	2	2	1	2	0.1	0.2	\$215.79
4. Annual proficiency test ^j	135	1	135	5	675	33.8	67.5	72,837.96
5. Rescheduling of proficiency test ^k	2	2	4	5	20	1	2	\$2,157.99
6. Certification test runs ^l	4	52	208	5	1,040	52	104	\$112,215.48
Subtotal for Reporting Requirements						5,974.7		
Recordkeeping Requirements								
Manufacturers								
1. Test documentation ^{c,m}	1	1.33	1.33	54	71.8	3.6	7.2	\$7,749.32
2. QA parameter inspections ⁿ	2	20	40	54	2,160	108	216	\$233,062.92
3. Sales data ^o	N/A							
4. R&D stoves report ^p	2	1	2	54	108	5.4	10.8	\$11,653.15
5. Retained stoves ^{c,q}	8	1.33	10.64	54	575	28.7	57.5	\$62,036.40
Retailers								
1. Used stoves ^r	0.1	4	0.4	875	350	17.5	35	\$37,764.82
Subtotal for Recordkeeping Requirements						3,754.5		
					8,460	423.2	846	\$912,852.94

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) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
TOTAL LABOR BURDEN AND COST (rounded)						9,729.2 9,729 (rounded)		\$912,853

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be 934. There will be no new additional sources during the next three years of this ICR. It was necessary to make several assumptions regarding: 1) how wood heater manufacturers would respond to the various alternatives for compliance; and 2) the large variety of wood heater manufacturer size and marketing approaches. Using data from the EPA section 114 survey of manufacturers, the following assumptions were developed for this burden calculation:

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

^b This ICR uses the following labor rates: \$116.05 per hour for Executive, Administrative, and Managerial labor; \$97.21 per hour for Technical labor, and \$48.87 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March, 2010, 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.

^c We have assumed that during the next three years of the woodstoves NSPS, the typical manufacturer will require four Phase II certification tests over the three year period. Thus, four notices in three years equals to 1.33 notices per year ($4/3 = 1.33$).

^d We have assumed that it will take each of the 54 respondents 2 hours 0.50 times per year to accomplish task.

^e We have assumed that the estimated time required to apply removable labels per wood heater is 30 seconds.

^f We have assumed that it will take twenty hours to include requisite information in owner's manual.

^g We have assumed that it will take each of the 54 respondents 2 hours 0.80 times per year to complete task.

^h We have assumed that one laboratory will apply for accreditation one time per year.

ⁱ We have assumed that there will be an average of two notification per proficiency test due to test cancellation and rescheduling.

^j We have assumed that each laboratory applying for accreditation, while another laboratory will not renew their accreditation;

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

^l We have assumed that each laboratory is expected to spend 4 hours per week to update and maintain records on certification tests.

^m We have assumed that respondents will each take 1 hour 1.33 times per year to complete task.

ⁿ We have assumed that 750 units per model year are produced, and that one out of every 150 units undergoes a parameter inspection. Thus, a parameter inspection will occur

approximately five times per year per manufacturer model. Since each manufacturer has four models, 20 parameter inspections will be conducted annually for each manufacture (5x4=20).

^o We have assumed that there will be no additional burden because manufacturers already keep track of sales data for marketing purposes and payment of income taxes.

^p We have assumed that one report will be filed by each manufacturer annually.

^q We have assumed that it will take 8 hours for each of the respondent to complete task.

^r We have assumed that one-tenth of the estimated 8,751 wood heater retailers will buy and sell used wood stoves. Each of the 875 retailers we assumed will purchase four used stoves per year and will spend six minutes per purchase maintaining records of each wood heater purchase.

Table 2: Average Annual EPA Burden - NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA (Renewal))

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) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
Response to applicability determination ^c	4	1	4	5	20	1	2	\$1,036.49
Manufacture certification notification and changes ^d	2	2.67	5.34	54	288.4	14.4	28.8	\$14,943.94
Certification test ^e	40	0.13	5.2	54	280.8	14.0	28.1	\$14,550.33
Apply for certification of model line ^f	60	1.33	79.8	54	4,309.2	215.5	430.9	\$223,324.12
Biennial reporting for certified models ^g	2	0.5	1	54	54	2.7	5.4	\$2,798.52
Laboratory application for accreditation ^h	40	1	40	1	40	2	4	\$2,072.98
Laboratory proficiency test notice accreditation ⁱ	2	1	2	1	2	0.1	0.2	\$103.65
Laboratory proficiency test notice – new lab accreditation ^{g, j}	25	1	25	1	25	1.3	2.5	\$1,298.72
Laboratory proficiency test report – annual ^k								
a. Test design and implementation	80	1	80	1	80	4	8	\$4,145.96
b. Test observation	40	0.25	10	5	50	2.5	5	\$2,591.22
c. Review of test reports	20	1	20	5	100	5	10	\$5,182.45
d. Analysis/conclusions	40	1	40	1	40	2	4	\$2,072.98
Parameter inspections ^l	40	0.25	10	54	540	27	54	\$27,985.23
Subtotals Labor and Burden and cost					5,829.4	291.5	582.9	\$302,106.59
TOTAL ANNUAL BURDEN AND COST (rounded)						6,703.8 6,704 (rounded)		\$302,107

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be 934. There will be no new additional sources during the next three years of this ICR. It was necessary to make several general assumptions regarding: 1) how wood heater manufacturers would respond to the various alternatives for compliance; and 2) the large variety of wood heater manufacturer size and marketing approaches. Using data from the EPA section 114 survey of manufacturers, the following assumptions were developed for this burden calculation:

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

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 for Managerial (GS-13, Step 5, \$38.92 x 1.6), \$46.21 for Technical (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 for Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2010 General Schedule which excludes locality rates of pay.

^c We have assumed that 10 percent of wood heater manufacturers will request a determination of applicability once per year.

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

^e We have assumed that there will be 1.33 certifications per manufacturer per year, and that EPA will send an observer to one out of every ten certification tests.

^f We have assumed that during the next three years of the woodstoves NSPS, the typical manufacturer will require four Phase II certification tests over the three-year period. Thus, four notices in three years equals to 1.33 notices per year ($4/3 = 1.33$).

^g We have assumed that biennial reporting equals 0.50 occurrences per year.

^h We have assumed that one new lab will apply for accreditation each year.

ⁱ We have assumed that for labs to receive accreditation, each laboratory will be required to perform a proficiency test one time during each year.

^j We have assumed that the one respondent will take 25 hours to complete the new lab accreditation.

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

^l We have assumed that random compliance audits to inspect wood heater parameters are expected to be conducted on one-quarter of each manufacturer's model lines per year.

