

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (Renewal), EPA ICR Number 1652.08, OMB Control Number 2060-0273.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaners/ Halogenated Hazardous Air Pollutants were proposed on November 29, 1993, and promulgated on December 2, 1994. The NESHAP was amended on: June 5, 1995; December 11, 1998; July 13, 1999; August 19, 1999; and May 3, 2007. Collectively, these amendments corrected errors and clarified regulatory text, promulgated compliance extension dates, permanently exempted area batch cold solvent cleaning machines that use halogenated solvents from the Federal operating permit program, deferred Federal operating permit requirements for subject area halogenated solvent cleaning machines, provided compliance options for continuous web cleaning machines, and revised standards to further limit hazardous air pollutant (HAP) emissions. None of these amendments affected the respondent reporting or recording requirements promulgated in the final rule published on December 2, 1994.

The regulations listed in 40 CFR part 63, subpart T, apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, 1, 1, 1-trichloroethane, trichloroethylene, carbon tetrachloride, chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. New facilities include those that commenced construction or reconstruction on or after December 2, 1994. This information is being collected to assure compliance with 40 CFR part 63, subpart T.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They 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. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/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 U.S. Environmental Protection Agency (EPA) regional office.

Over the next three years, an average of 1,431 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard.

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

The “Affected Public” are owners or operators of solvent cleaning machines using any solvent containing methylene chloride, perchloroethylene, 1, 1, 1-trichloroethane, trichloroethylene, carbon tetrachloride, chloroform, or any combination of these halogenated solvents in a concentration greater than 5 percent by-weight. The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (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, and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (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. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

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

In the Administrator's judgment, HAP emissions from solvent cleaning machines cause

or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart T.

2(b) Practical Utility/Users of the Data

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

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard 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 standard is being met. The performance test may also be observed.

The required 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. 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 its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can

be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

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 (77 FR 63813) on October 17, 2012. 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, in compliance with the recordkeeping and reporting provisions in the standard, 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.

Consultations with industry representatives (i.e., respondents) were conducted to determine if there is any way for EPA to reduce the recordkeeping and reporting burden or improve the language in the standard to make it easier to comply. In developing this ICR, the EPA contacted: 1) the Halogenated Solvents Industry Alliance (HSIA), at (703) 741-5780; and 2) the American Chemistry Council, at (703) 741-5583. EPA did not receive any comments from either consultant.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as those submitted in response to the first Federal Register notice.

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.

These standards require the respondents 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 the

Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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

The reporting or recordkeeping requirements in the standard do not include 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 and corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standard are listed below.

Standard (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

Standard (40 CFR Part 63, Subpart T)	SIC Codes	NAICS Codes
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
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

Standard (40 CFR Part 63, Subpart T)	SIC Codes	NAICS Codes
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

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T).

A source must make the following reports:

Notifications/Reports	
Initial notification	63.9(b), 63.462 (d), 63.468(a), 63.468(b)
Notification that source is subject to special compliance requirements	63.9(d)
Notification of performance test	63.9(e)
Compliance report	63.468(c)
Statement of Compliance	63.468(d), 63.468(e)
Annual report on operator training	63.468(f)
Annual report on solvent emissions	63.468(g)
Semiannual or quarterly exceedance reports	63.468(h and i)
Equivalency request report	63.468(k)

A source must keep the following records:

Recordkeeping	
Maintain equipment records for the lifetime of the machine, including owners' manual, installation date, dwell testing, initial performance	63.467(a)

Recordkeeping	
testing, halogenated HAP solvent contents, and squeegee and air knife system determinations and monitoring	
Maintain control device monitoring, maintenance, annual solvent consumption, and carbon adsorber records for five years	63.467(b)
Maintain solvent consumption, waste composition, and emissions calculations records for five years	63.467(c)
Maintain records on method used to determine cleaning capacity	63.467(d)
Maintain solvent consumption, solvent recovery, waste composition, and emissions calculations for five years	63.467(e)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

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

(ii) Respondent Activities

Respondent Activities
Read instructions.
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.

Respondent Activities
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 and reporting equipment that provide 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
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 Online Tracking Information System (OTIS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and to 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 OTIS which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated authorities can edit, store, retrieve and analyze the data.

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

5(c) Small Entity Flexibility

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, is defined as small entities 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). The impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (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. 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 45,242 hours (Total Labor Hours from Table 1 below). 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	\$121.44 (\$57.83+ 110%)
Technical	\$100.23 (\$47.73 + 110%)
Clerical	\$50.51 (\$24.05 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2012, "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 type of industry costs associated with the information collection activities in the subject standard 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 (O&M) 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 ¹	(G) Total O&M, (E X F)
Temperature monitoring device	\$2,700	0	0	\$860	1,180	\$1,014,800

¹ The O&M cost only applies to the 1,180 batch vapor and in-line solvent cleaning machines, and does not include the 251 batch cold solvent cleaning machines.

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total O&M costs for this ICR are \$1,014,800. 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 \$1,014,800.

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 \$201,805.

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), 2011 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 and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (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 1,431 existing respondents will be subject to the standard. No additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 1,431 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents 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)
Batch vapor and in-line cleaning machines					
1	0	1,180	0	0	1,180
2	0	1,180	0	0	1,180
3	0	1,180	0	0	1,180
Average		1,180			1,180
Batch cold cleaning machines					
1	0	0	251	0	251
2	0	0	251	0	251
3	0	0	251	0	251
Average			251		251
TOTAL (sum of average batch vapor, in-line, and batch cold cleaning machines)					1,431

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

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 1,431.

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Batch vapor and in-line cleaning machines				
Annual compliance report	1,180	1	0	1,180
Quarterly exceedance reports	118	4	0	472
Semiannual exceedance reports	1,062	2	0	2,124

Total Annual Responses				
Batch cold cleaning machines				
Initial notification report and compliance report	0	2	251	251
			Total	4,027

The number of Total Annual Responses is 4,027.

The total annual labor costs are \$4,380,761. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

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

(i) Respondent Tally

The total annual labor hours are 45,242 at a cost of \$4,380,761. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 11 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$1,014,800. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 4,478 labor hours at a cost of \$201,805. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (Renewal).

6(f) Reasons for Change in Burden

There is an apparent increase in burden hours for the respondent and the Agency as compared to the previous ICR due to burden calculation revisions. The calculations presented in the previous ICR assumed that total respondent hours per year associated with each burden item

included technical, managerial, and clerical labor. The previous ICR then back-calculated technical, managerial, and clerical labor hours as being 85, 5, and 10 percent, respectively, of the total hours. To be consistent with the estimation methodology used in other ICRs, this ICR considers total respondent hours to include only technical labor, and that managerial and clerical hours account for an additional 5 and 10 percent, respectively, of those technical labor hours. Additionally, there is an adjustment increase in the respondent labor estimates associated with semiannual and quarterly reporting. The previous ICR estimated labor burdens for one semiannual report and three quarterly reports per year. We have revised the calculations to account for the burden associated with two semiannual and four quarterly reports per year.

There is also an increase in the respondent cost as compared to the most recently approved ICR due to the use of updated labor rates. This ICR references the most recent labor rates from the Bureau of Labor Statistics.

There is a decrease in the Agency cost due to the correction of a calculation error that was identified in the previous ICR. The previous ICR incorrectly estimated Agency costs using civilian labor rates, which resulted in an overestimated total Agency cost. This ICR corrects this discrepancy by using current labor rates from the Office of Personnel Management.

There is also an adjustment increase in the estimated number of responses due to a correction. The previous ICR did not include annual compliance reports in calculating the number of responses. This ICR corrects the error, which results in an increase of 1,180 responses.

There is a decrease of \$200 in total O&M costs in this ICR as compared to the previous ICR. The previous ICR calculated an O&M cost of \$1,014,800, but rounded the estimate to the nearest thousand (\$1,015,000). This ICR presents a more accurate estimate; there are no actual changes to the O&M costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 11 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 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-2012-0660. An electronic version of the public docket is available at <http://www.regulations.gov>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2012-0660 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: Annual Respondent Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (Renewal)

Burden Item	A	B	C	D	E	F	G	H
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year ^a	Technical person-hours per year (E=CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
1. Applications								
a. Batch vapor and in-line cleaning machines	N/A							
b. Batch cold cleaning machines	N/A							
2. Survey and studies								
a. Batch vapor and in-line cleaning machines	N/A							
b. Batch cold cleaning machines	N/A							
3. Reporting Requirements								
a. Batch vapor and in-line cleaning machines								
i. Read Instructions ^c	2	1	2	0	0	0	0	\$0
ii. Gather existing information	Included in 3A(iii)							
iii. Write Report								
Initial notification report	1	1	1	0	0	0	0	\$0
Initial compliance report	4	1	4	0	0	0	0	\$0
Performance test results ^d	30	1	30	0	0	0	0	\$0
Annual compliance report ^e	1.5	1	1.5	1,180	1,770	88.5	177	\$197,094.81
Report with exceedance ^{f, g}	1	4	4	118	472	23.6	47.2	\$52,558.62
Report with no exceedance ^{f, h}	0.5	2	1	1,062	1,062	53.1	106.2	\$118,256.89
b. Batch cold cleaning machines								
i. Read Instructions ⁱ	0.5	1	0.5	0	0	0	0	\$0
ii. Gather existing information	Included in 3B(iii)							
iii. Write Report ^j								
Initial notification report	0.25	1	0.25	0	0	0	0	\$0

Burden Item	A	B	C	D	E	F	G	H
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year ^a	Technical person-hours per year (E=CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
Initial compliance report	0.25	1	0.25	0	0	0	0	\$0
Subtotal for Reporting Requirements						3,799.6		\$367,910.32
4. Recordkeeping Requirements								
a. Batch vapor and in-line cleaning machines								
i. Read instructions	Included in 3A(i)							
ii. Plan activities	N/A							
iii. Implement activities								
Performance test ^d	50	1	50	0	0	0	0	\$0
Control device monitoring ^{k,1}	1.64	12	19.68	590	11,611.2	580.56	1,161.12	\$1,292,941.95
Solvent consumption log ^m	1.5	12	18	590	10,620	531	1,062	\$1,182,568.86
iv. Record Data								
Control device monitoring ^{l,n}	1.2	12	14.4	590	8,496	424.8	849.6	\$946,055.09
Solvent emission calculation ^{m,o}	0.75	12	9	590	5,310	265.5	531	\$591,284.43
v. Time to train personnel ^p								
b. Batch cold cleaning machines	N/A							
Subtotal for Recordkeeping Requirements						41,442.8		\$4,012,850.33
TOTAL ANNUAL BURDEN AND COST (rounded)						45,242		\$4,380,761

Assumptions:

- ^a We estimate that an average of 1,431 existing respondents will be subject to the rule over the three-year period of this ICR. Of this total, 1,180 respondents are subject to batch vapor and in-line cleaning machine requirements while 251 respondents are subject to batch cold cleaning machine requirements. No new respondents are expected.
- ^b This ICR uses the following labor rates: \$100.23 for technical, \$121.44 for managerial, and \$50.51 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2012, "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 assume it will take 2 hours to read instructions.

- d. We estimate that idling emission or dwell test reports will require 80 technical hours, which are divided between the test report (30 hours) and the test itself (50 hours).
- e. We assume that 1,180 facilities are required to complete the annual compliance report.
- f. The burden of one quarterly and one semiannual exceedance report is 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 (quarterly reporting).
- h. We assume that 90 percent of 1,180 facilities are not in exceedance (semiannual reporting).
- i. We assume that it will take 0.5 hours to read instructions.
- j. We assume that it will take 0.25 hours to write each report.
- k. Actual monitoring is conducted weekly, monthly or quarterly for specific control devices. The estimated time is 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. We assume that it would take 1.2 hours per facility to record data.
- o. We assume that it would take 0.75 hours per facility to record solvent consumption data.
- p. We assume that no special training requirements are required.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (Renewal)

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^a
Report Activity								
1. Batch vapor and in-line cleaning machine								
a. Initial notification report	1	1	1	0	0	0	0	\$0
b. Initial compliance report	2	1	2	0	0	0	0	\$0
c. Performance test results ^b	8	1	8	0	0	0	0	\$0
d. Annual compliance report ^c	2	1	2	1,180	2,360	118	236	\$122,305.82
Report with exceedance ^{d,e}	1	4	4	118	472	23.6	47.2	\$24,461.16
Report with no exceedance ^{d,f}	0.5	2	1	1,062	1,062	53.10	106.2	\$55,037.62
2. Batch Cold Cleaning Machines								
a. Initial notification/compliance report	0.25	1	0.25	0	0	0	0	\$0
TOTAL ANNUAL BURDEN AND COST (rounded)						4,478		\$201,805

Assumptions:

- ^a. This ICR uses the following labor rates: \$46.21 for technical, \$62.27 for managerial, and \$25.01 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2011 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
- ^b. We assume that it will take 8 hours to review performance test results.
- ^c. All facilities are expected to submit annual compliance reports summarizing either solvent consumption data or monitoring results for each cleaning machine.
- ^d. The burden of one quarterly and one semiannual exceedance report is included in the burden estimate for the annual report.
- ^e. We assume that 10 percent of 1,180 facilities are in exceedance at least one time per year.
- ^f. We assume that 90 percent of 1,180 facilities are not in exceedance.