

1SUPPORTING STATEMENT

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

PART A

1.0 Identification of the Information Collection

(a) *Title of the Information Collection.*

The title of the Information Collection Request (ICR) is NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (Revision), U.S. Environmental Protection Agency (EPA) tracking number 1176.12, Office of Management and Budget (OMB) Control Number 2060-0161.

(b) *Short Characterization/Abstract.*

This ICR covers information collection requirements in the final revisions of the New Source Performance Standards (NSPS) for new residential wood heaters (40 CFR part 60, subpart AAA (subpart AAA)). The information collected will be used by the EPA and delegated state and local agencies to determine the compliance status of sources subject to the rule. A wood heater is defined as an enclosed, wood burning appliance capable of and intended for residential or space heating and domestic water heating. Unless otherwise specified, these devices include, but are not limited to, adjustable burn rate wood heaters, single burn rate wood heaters and pellet stoves.

One feature of the NSPS requires emphasis at the outset. That is, the requirements of subpart AAA establish a certification program instead of the usual NSPS requirements where each affected facility is required to demonstrate compliance through performance testing. Under the subpart AAA-required certification program, a single wood heater is tested to demonstrate compliance with particulate matter (PM) emission limits for an entire model line which could consist of thousands of stoves. The use of a certification approach significantly reduces the compliance burden, including information collection, for the manufacturers of wood heating appliances. In order to minimize risks to the environment from intentional or accidental misuse of the certification approach, subpart AAA includes several safeguards, some of which entail reporting and recordkeeping.

There are approximately 66 manufacturers and 6 laboratories (inclusive of both test labs and third-party certifiers) that would be subject to the final amended subpart AAA. Under

subpart AAA, wood heater manufacturers, testing laboratories and third-party certifiers are required to submit reports to the EPA and to maintain records for demonstrating compliance with the NSPS. The information supplied by the manufacturer to the EPA is used to: (1) ensure that best system of emission reduction is being applied to reduce emissions from wood heaters; (2) ensure that the wood heater tested for certification purposes is in compliance with the applicable emission standards; (3) provide assurance that non-tested production model heaters have emission performance characteristics similar to tested models; and (4) provide an indicator of continued compliance. Information supplied to the EPA by testing laboratories and third-party certifiers is used to grant or deny laboratory accreditation, assure continued test lab proficiency and to assist in enforcement and compliance activities.

Subpart AAA does not require any reporting or recordkeeping requirements on wood heater owners or operators. However, the final rule specifies a list of prohibited fuel types and prohibited operations as well as good operating and good burning practices (which are required to be included in the owner's manual for certified wood heater models) that owners and operators are directed to follow when installing and operating their wood stoves.

The phased implementation schedule of the final rule along with the two-step PM emission standards approach (with phased compliance dates) results in differing recordkeeping and reporting impacts. For purposes of the supporting statement, we refer to these steps as Step 1 and Step 2. The compliance date for meeting Step 1 emission standards provided in the rule occurs in 2015, and the compliance date for meeting Step 2 emission standards provided in the rule occurs in 2020. The recordkeeping and reporting burden estimates provided during this ICR period are for years 2015 to 2017. The recordkeeping and reporting burden cost estimates as a result of the subpart AAA final amendments for years 2018 to 2020 are presented in a memo to the docket.¹ The recordkeeping and reporting respondent burden estimates included in this supporting statement for years 2015 to 2017 and the burden estimates outlined in the memo for years 2018 to 2020 are both included in cost impacts estimates included in a memo in the docket for the final rule.²

You can find the estimated burden to the "Affected Public" listed in Table 1, Three-Year and Annual Respondent Burden and Cost of Reporting and Recordkeeping Requirements of the

¹ Memorandum to Docket ID Number EPA-HQ-OAR-2009-0734 from EC/R, Inc. *40 CFR Part 60, Subparts AAA and QQQQ Estimated Three-Year and Annual Respondent Burden Cost of Reporting and Recordkeeping Requirements (Years 2018 to 2020)*. January 2015.

² Memorandum to USEPA from EC/R, Inc. *Estimated Wood Heater Manufacturer Cost Impacts*. January 2015.

Final Amended Rule. The federal government burden associated with the review of reports submitted by the respondents is shown below in Table 2, Three-Year and Annual Burden and Cost to the Federal Government of the Final Amended Rule. (Tables 1 and 2 are located at the end of this supporting statement.) We do not anticipate any reporting or recordkeeping burden for state, local or tribal entities because we have only delegated enforcement of the standards for new residential wood heaters sold or operated in their region. Under subpart AAA, partial delegations shall not include:

- (1) Decisions on certification;
- (2) Revocation of certification;
- (3) Standards;
- (4) Test methods;
- (5) Laboratory and third-party certifier approvals and revocations;
- (6) Enforcing provisions governing content of owner's manuals; and
- (7) Hearings and appeals procedures.

The information collection requirements for new sources subject to the NSPS for Residential Wood Heaters are listed in Attachment 1.

2. Need For and Use of the Collection

(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 system of emission reduction which (taking into consideration the cost of achieving such reduction and 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 system of emission reduction.” Section 111 also requires that the Administrator review and, if appropriate, revise such standards every 8 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.

The records and reports required under the amended subpart AAA are necessary for the Administrator to confirm the compliance status of new residential wood heaters sold in the

United States. These recordkeeping and reporting requirements are authorized by CAA section 114.

(b) Practical Utility/Users of the Data.

The control of pollution from new residential wood heaters relies on the reduction of particulate matter emissions by proper wood heater design. A representative unit for each model line is subjected to a certification test for particulate matter emissions for a range of operating conditions. The manufacturer also contracts with a third-party certifier, which reviews the test reports and quality assurance (QA) plan, and conducts periodic QA audits to ensure that wood heaters manufactured subsequent to the initial certification test continue to comply with the NSPS. Manufacturers must renew or recertify their wood heater model lines every 5 years or when they make changes to the model line that would exceed specified parameters.

The required certification test notification is used to inform the EPA when a new model line is expected to be tested. The EPA may then observe the testing, if desired. Emission test reports are needed as these are the EPA's record of a model line's initial capability to comply with the emission standards, and serve as a record of the operating conditions under which compliance was achieved. The EPA compliance audit tests and QA annual audit reports are necessary to ensure continued compliance with emissions standards.

Adequate recordkeeping and reporting are necessary to ensure compliance with these standards as required by the CAA. 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

(a) Non-duplication.

A computer search of the EPA's ongoing ICRs revealed no duplication of information-gathering efforts. The information-gathered under the final amended subpart AAA will replace the information gathered under subpart AAA prior to being amended.

Similar requirements to this amended NSPS are found in the requirements to 40 CFR part 60, subpart QQQQ, the NSPS for New Residential Hydronic Heaters and Forced-Air Furnaces. Subpart QQQQ has a separate ICR undergoing OMB review. Although the requirements are similar, they are not duplicative because they apply to separate groups of appliances and their associated manufacturers. In the case of test laboratories and third-party

certifiers, similar test accreditation requirements are found in both subparts, but each has different test methods. Therefore, the requirements under each of these subparts are not duplicative because separate accreditation is required for each test method.

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

The preamble to the proposed rule (79 FR 6330, February 3, 2014) provided public notice of the proposed ICR. The EPA considered comments (see Docket No. EPA-HQ-OAR-2009-0734) when preparing this revised ICR. The preamble to the final rule provides public notice on this revised ICR.

(c) Consultations.

The final rule amendments were developed using information obtained during extensive consultation with individual companies, trade associations and state agencies. Several of the key non-EPA persons consulted on the information collection activities are identified in Table 3. Additional meetings and contacts are documented in the project docket for this final rule, Docket No. EPA-HQ-OAR-2009-0734.

TABLE 3. PERSONS CONSULTED ON THE INFORMATION COLLECTION ACTIVITIES

Contact	Organization	Telephone Number
John Crouch	Hearth, Patio, Barbecue Association (HPBA)	916.536.2390
Rick Curkeet	Intertek Testing Services	608.836.4400
Alice Edwards	Alaska Dept. Of Environmental Conservation	907.465.5105
Bob Ferguson	Ferguson, Andors & Company	802.763.2339
Stephen Hartsfield	National Tribal Air Association	505.242.2175
Mike Haefner	American Energy Systems	320.587.6565
Dan Henry	Hearth & Home Technologies	509.685.8904
Ben Myren	Myren Consulting, Inc.	509.684.1154
Chris Neufeld	Blaze King Industries	509.522.2730
Mitch Pisik	Breckwell Hearth Products	817.652.9602
Lisa Rector	Northeast States for Coordinated Air Use Measurement (NESCAUM)	617.259.2095
Rod Tinnemore	Washington State Department of Ecology	360.407.6978
Steve Vogelzang	Vogelzang International, Inc.	616.396.1911
Paul Williams	United States Stove Company	423.837.2100

(d) *Effects of Less Frequent Collection.*

Less frequent information collection would decrease the margin of assurance that manufacturers are producing residential wood heaters that (1) pass the initial certification test, and (2) continue to be manufactured in a way that ensures continuous compliance with the emission standards. If the information required by these standards were collected less frequently, the likelihood of detecting violations would be reduced.

(e) *General Guidelines.*

None of the guidelines in 5 CFR 1320.6 is being exceeded, with the exception of the requirement to retain records for 5 years (which exceeds the guideline requirement that records not be required to be retained for more than 3 years). The basis for the 5-year record retention is because the required emission standard model certifications are valid for 5 years prior to the need for renewal or recertification. During this time, the EPA needs to require the retention of model certification tests and QA compliance documentation to support initial and continued compliance with model certifications (e.g., certification tests, QA emissions tests, QA audit reports, biennial reports).

(f) *Confidentiality.*

All information submitted to the EPA for which a claim of confidentiality is made will be safeguarded according to the EPA regulations set forth in 40 CFR 2.201 *et seq.*, Chapter 1, Part 2, Subpart B—Confidentiality of Business Information.

(g) *Sensitive Questions.*

This section is not applicable because this ICR does not involve matters of a sensitive nature.

4. The Respondents and the Information Requested

(a) *Respondents/NAICS Codes.*

Potential respondents under subpart AAA are manufacturers of new residential wood stoves and pellet heaters. The North American Industry Classification System (NAICS) code for residential wood heating manufacturing facilities is 333414, Heating Equipment (Except for Warm Air Furnace Manufacturing). Subpart AAA also applies to laboratories that conduct or plan to conduct wood heater certification tests (referred herein as testing labs) and laboratories

that plan to become third-party certifiers (referred herein as third-party certifiers) for manufacturers. The NAICS code for testing laboratories is 541380.

(b) Information Requested.

(i) Data Items, Including Recordkeeping Requirements. 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). The reporting requirements for NSPS subpart AAA were uniquely designed for the manufacturers, third-party certifiers and testing laboratories. The records required by this regulation must be retained by the manufacturer, third-party certifier and/or test laboratory for 5 years. A special table is attached that describes the reporting and recordkeeping requirements. See Attachment 1.

(ii) Respondent Activities. The respondent activities that will be required by the final amended New Residential Wood Heater NSPS are identified in Table 1 (located at the end of this supporting statement) and introduced in section 6(a).

5. The Information Collected—Agency Activities, Collection Methodology and Information Management

(a) Agency Activities.

Attachment 2 is a summary of the reporting and recordkeeping requirements for the federal government. The EPA activities associated with the final amended New Residential Wood Heater NSPS are provided in Table 2 (located at the end of this supporting statement) and are introduced in section 6(c).

(b) Collection Methodology and Management.

All reports are sent directly to the EPA electronically. Data obtained from reports submitted and records maintained by the respondents will be used in compliance and enforcement programs. Portions of the data obtained will be entered into a special database program maintained exclusively by the EPA and some of the data will be made available to the public on an EPA website.

The EPA provides public access to the list of certified appliances and their emissions ratings on line at <http://www.epa.gov/compliance/resources/publications/monitoring/caa/woodstoves/certifiedwood.pdf>.

(c) *Small Entity Flexibility.*

Most of the manufacturers, laboratories and commercial owners affected by the final amended subpart AAA are considered small businesses based on the definition used by the Small Business Administration. Additional efforts were taken by the EPA to reduce the burden imposed on the smallest businesses affected by this regulation. For heaters/stoves with EPA certification currently in effect with Step 1 emission standards, we are giving conditional, automatic certification approval until the Step 2 emission standards effective date (2020). Allowing conditional, automatic certification of those heaters/stoves with compliant certifications and including phased compliance dates in the final rule allows additional time for sources to come into compliance and helps reduce the burden on small businesses by spreading out research and development (R&D) costs over several years. We have also retained certification waiver provisions in the existing subpart AAA because they reduce the need for sources to re-test already certified models under qualifying conditions and reduce the burden associated with the certification process for small manufacturers of wood heaters. The final rule also includes changes to the QA program requirements that align better with existing safety QA procedures, thus eliminating duplicative procedures. Lastly, we have also deferred the requirement for (1) EPA-accredited test labs to be accredited under subpart AAA for three years after the effective date of the rule and (2) non EPA-accredited test labs to be accredited under subpart AAA for six months after the effective date of the rule.

(d) *Collection Schedule.*

The specific frequency for each information collection activity within this request is shown in Table 1 for the residential wood heater source category, which is located at the end of this supporting statement.

6. Estimating the Burden and Cost of the Collection

(a) *Estimating Respondent Burden.*

The annual recordkeeping and reporting respondent burden estimates for the New Residential Wood Heater NSPS final amended rule are shown in Table 1, located at the end of this section. These numbers were derived from estimates based on the EPA's experience with implementing existing subpart AAA and other standards.

(b) *Estimating Respondent Costs.*

(i) *Estimating Labor Costs.* Loaded labor rates have been calculated for 2013. We used May 2013 labor rates from the Bureau of Labor Statistics for the Ventilation, Heating, Air-Conditioning and Commercial Refrigeration Equipment Manufacturing (NAICS 333400).¹ Loading factors (i.e., fringe benefits and overhead rates) were calculated using methodologies referenced in promulgated regulations and their accompanying ICRs, particularly those used in New Source Review (NSR) regulations. Fringe benefits are calculated as 29 percent of hourly earnings, and overhead is calculated using a standard 110 percent above hourly earnings. Table 4 presents the labor rates used in the cost analysis.

TABLE 4. 2013 LOADED LABOR RATES

Labor Category	Hourly earnings [2013]	Fringe	Overhead	Loaded 2013 Hourly Earnings (\$)
Professional specialty and technical	31.53	1.29	2.1	\$85.41
Executive, admin, managerial	54.89	1.29	2.1	\$148.70
Admin support	18.22	1.29	2.1	\$49.36

(ii) *Estimating Capital and Operations and Maintenance (O&M) Costs.* In this section we provide estimated capital costs and one-time start-up costs associated with complying with the NSPS over the three-year ICR clearance period. These costs are summarized in Table 5 at the end of this section. Estimated capital costs included in Table 5 include fixed capital cost estimates provided by an analysis prepared by Ferguson, Andors & Company for the Hearth, Patio and Barbecue Association.² See the manufacturer costs impacts memo³ and the unit cost memo⁴ for more information on assumptions used in this section. Note that these cost impacts differ from ICR 1176.11 based on new information on the structure of the industry and the final

¹ May 2013 *National Industry-Specific Occupational Employment and Wage Estimates*. Located http://www.bls.gov/oes/current/naics4_333400.htm.

² Ferguson, Robert (Ferguson, Andors & Company), prepared for the Hearth, Patio & Barbecue Association. *Proposed Wood Heater NSPS Incremental Cost Effectiveness Analyses*, Appendix A: Woodstove Cost Modeling. (Available at <http://www.regulations.gov/#!documentDetail:D=EPA-HQ-OAR-2009-0734-1643>).

³ Memorandum to USEPA from EC/R, Inc. *Estimated Wood Heater Manufacturer Cost Impacts*. January 2015.

⁴ Memorandum to USEPA from EC/R, Inc. *Unit Cost Estimates of Residential Wood Heating Appliances*. January 2015.

amendments made to subpart AAA that would result in additional expenses during the three-year ICR clearance period in order for all models to comply with the final standards.

As discussed in the manufacturer cost impacts memo, we estimate that there are currently 125 model lines of adjustable burn rate stoves produced by 34 manufacturers, 20 model lines of single burn rate stoves produced by 3 manufacturers and 125 model lines of pellet stoves produced by 29 manufacturers. We assume that 90% of existing adjustable burn rate models (0.9×125 models = 112.5)(34 manufacturers), 25% of existing pellet stove models (0.25×125 models = 31.25)(29 manufacturers), and 0% of single burn rate stove models ($0 \times 20 = 0$) (3 manufacturers) will meet EPA criteria as meeting Step 1 emission standards, and therefore will not need to test or apply for certifications during the three-year ICR period (2015-2017). We assume that a like number of models to replace existing models that currently do not meet the Step 1 emission standards (approximately 126 models) will be developed/tested and will apply to certify to meet the Step 1 emission standards or Step 2 emission standards during the three-year ICR period (2015-2017) at a cost of \$16,750 per test (includes EPA-required testing (\$11,000), confirmation safety testing or full safety testing (\$5,000), and shipping of prototype(s)(\$750 costs)).¹

The amended NSPS requires a permanent label on each wood heater model. To estimate the capital costs of the permanent label, we assumed the capital costs to be \$400 per model certified (including those that receive conditional certification) and that all new models produced by all manufacturers to meet subpart AAA will have a permanent label affixed. These costs are consistent with cost estimates provided in Ferguson's analysis.²

The amended NSPS requires that each wood heater offered for sale by a commercial owner be accompanied by an owner's manual that contains specified installation and operation and maintenance information required to be followed to minimize emissions. We have assumed an average fixed cost of \$2,250 for owner's manual (revised or new, possibly bilingual) per model, assuming 125 pellet stoves, 44 adjustable burn rate stoves and 20 single burn rate stove

¹ Ferguson, Robert (Ferguson, Andors & Company), prepared for the Hearth, Patio & Barbecue Association. *Proposed Wood Heater NSPS Incremental Cost Effectiveness Analyses*, Appendix A: Woodstove Cost Modeling. (Available at <http://www.regulations.gov/#!documentDetail:D=EPA-HQ-OAR-2009-0734-1643>); Page 8, Table 5. Fixed Costs per Model: Certification).

² Ferguson, Robert (Ferguson, Andors & Company), prepared for the Hearth, Patio & Barbecue Association. *Proposed Wood Heater NSPS Incremental Cost Effectiveness Analyses*, Appendix A: Woodstove Cost Modeling. (Available at <http://www.regulations.gov/#!documentDetail:D=EPA-HQ-OAR-2009-0734-1643>); Page 8, Table 5. Fixed Costs per Model: Certification). May 2014.

owner's manuals will need to be developed/revised to include subpart AAA requirements. These costs are consistent with cost estimates provided in an analysis prepared for the Hearth, Patio & Barbecue Association (HPBA) by Ferguson, Andors & Company.¹

The 1988 requirements for manufacturer QA programs are strengthened in the revised rule by requiring the manufacturer to contract with a third-party certifier to conduct QA audits. The third-party certifier will be required to conduct regular (at least annual), unannounced audits (and prepare a report for submission to the EPA) of each certified model line to ensure that the manufacturer's QA plan is implemented properly. For purposes of this ICR, we assume that the contracted third-party certifier will require one QA performance test and one QA audit for each of the wood stove manufacturers (66 manufacturers) under the QA program between 2015 and 2017.

Another category of capital costs includes costs that would be incurred if the EPA requests a compliance audit, which would be infrequent and sporadic. We assume that there would only be one EPA compliance audit during the three-year ICR period (2015-2017) that would affect one manufacturer. For purposes of estimating the capital costs that would be incurred by an EPA compliance audit, we assume the cost of one appliance (based on the average of two appliances: 1 adjustable burn rate model (\$848 each) and 1 pellet (\$1,281 each) stove model) plus \$16,750 for testing (includes EPA-required testing (\$11,000), confirmation safety testing or full safety testing (\$5,000), and shipping of prototype(s) (\$750) costs).

The last category of capital costs relates to ISO accreditation costs for test labs and third-party certifiers seeking accreditation (assuming a cost of \$75,000/accreditation). Table 5 presents the estimated capital/start-up costs for the three-year clearance period (2015-2017).

¹ Ferguson, Robert (Ferguson, Andors & Company), prepared for the Hearth, Patio & Barbecue Association. *Proposed Wood Heater NSPS Incremental Cost Effectiveness Analyses*, Appendix A: Woodstove Cost Modeling. (Available at <http://www.regulations.gov#!documentDetail:D=EPA-HQ-OAR-2009-0734-1643>); Page 8, Table 5. Fixed Costs per Model: Certification). May 2014.

TABLE 5. ESTIMATED CAPITAL/START-UP COSTS FOR THREE-YEAR CLEARANCE PERIOD (2015-2017)¹

(A) Data Collection Device	(B) Capital/Start-Up for One Respondent/Unit	(C) Number of New Respondents/Models/Units	(D) Total Capital/Start-Up Cost (B X C)
Certification Test ^a	\$16,750 per respondent	126 models	\$2,110,500
Cost of Permanent Label ^b	\$400 per model	270 models	\$108,000
QA Performance Test ^c	\$16,750 per respondent	66 respondents	\$1,105,500
EPA Compliance Audit Test ^d	\$17,815 per respondent	1 respondent	\$17,815
Owners Manual ^e	\$2,250 per model	270 models	\$607,500
ISO Accreditation-Test Laboratories ^f	\$75,000 per respondent	4 respondents	\$300,000
ISO Accreditation-Third-Party Certifiers ^g	\$75,000 per respondent	2 respondents	\$150,000
Totals			\$4,399,315
Annual average			\$1,466,438

^a Models certified by testing per manufacturer: Assumes that 90% of existing adjustable burn rate models (.9 X 125 models = 112.5)(34 manufacturers), 25% of existing pellet stove models (.25 X 125 models=31.25)(29 manufacturers), and 0% of single burn rate stove models (0 X 20 = 0) (3 manufacturers) will not need to test and apply to certify to meet emission standards during the three-year ICR period (2015-2017). We assume that manufacturers will test (at a cost of \$16,750 per test (includes EPA testing (\$11,000), confirmation safety testing or full safety testing (\$5,000), and shipping of prototype(s)(\$750 costs)) and apply to meet emission standards for 126 models during the three-year ICR period (2015-2017) in order to replace old models that will not meet the Step 1 emission standards.

^b Total costs of permanent labels are estimated to be \$400 per model. We estimate that there will be 270 certified models produced by all manufacturers (66 manufacturers) during the period covered by this ICR (2015-2017) that would be subject to permanent labeling requirements.

^c Assumes that there will be 66 QA performance tests (at a cost of \$16,750 per test (includes EPA testing (\$11,000), confirmation safety testing or full safety testing (\$5,000), and shipping of prototype(s)(\$750 costs)) under the QA program during the three-year period covered by this ICR (2015-2017). We assume that each of the 66 manufacturers will be required to test one model under their QA program between 2015 and 2017.

^d Assumes that there will be EPA compliance audit testing for one model affecting one manufacturer during the period covered by this ICR (2015-2017). Costs for EPA compliance audit testing of one model assumes the cost of one appliance (based on the average cost of two models: 1 adjustable burn rate model (\$848 each) and 1 pellet (\$1,281 each) stove model)) plus \$16,750 for the test (includes EPA testing (\$11,000), confirmation safety testing or full safety testing (\$5,000), and shipping of prototype(s) (\$750) costs).

¹ Ferguson, Robert (Ferguson, Andors & Company), prepared for the Hearth, Patio & Barbecue Association. *Proposed Wood Heater NSPS Incremental Cost Effectiveness Analyses*, Appendix A: Woodstove Cost Modeling. (Available at <http://www.regulations.gov/#!documentDetail:D=EPA-HQ-OAR-2009-0734-1643>); Page 8, Table 5. Fixed Costs per Model: Certification).

^e Assumes an average fixed cost of \$2,250 for owner's manual (revised or new, possibly bilingual) per model (270 models) that will need to be developed/revised to include subpart AAA requirements.

^f Assumes all test labs will be ISO accredited (that are going to choose to be accredited) before 2018, a total of four labs between 2015 and 2017 and 0 occurrences between 2018 and 2020. We assume an average cost to obtain ISO accreditation is \$75,000 based on cost estimates provided by manufacturers.

^g Assumes all third-party certifiers will be ISO accredited (that are going to choose to be accredited) before 2018, a total of two third-party certifiers between 2015 and 2017 and 0 occurrences between 2018 and 2020. We assume an average cost to obtain ISO accreditation is \$75,000 based on cost estimates provided by manufacturers.

(iii) *Annualizing Capital Costs.* The total annual capital/start-up costs are estimated to average \$1,466,438 over the period of this ICR (2015-2017).

(c) *Estimating Agency Burden and Cost.*

The major costs to the EPA are those costs associated with reviewing applications for model certifications, testing lab and third-party certifier accreditations, and ongoing compliance verification QA functions. This is consistent with the overall EPA compliance and enforcement program, which 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 3 years of the ICR is estimated to be \$32,603. See Table 2, located at the end of this supporting statement.

The agency labor rates are from the Office of Personnel Management (OPM) 2014 General Schedule which excludes locality rates of pay. These rates can be obtained from Salary Table 2014-GS available on the OPM website, <http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/salhr1.pdf>. The government employee labor rates are \$15.78/hour for clerical (GS-6, Step 3), \$29.17 for technical (GS-12, Step 1) and \$39.31/hr for management (GS-13, Step 5). These rates were increased by 60 percent to include fringe benefits and overhead. The fully-burdened wage rates used to represent agency labor costs are: clerical at \$25.25, technical at \$46.67 and management at \$62.90.

(d) *Estimating the Respondent Universe and Total Burden and Costs.*

Subpart AAA requires wood heater manufacturers, test laboratories and third-party certifiers to submit reports and/or to maintain records for demonstrating and documenting compliance with the NSPS. A third-party certification process is required under subpart AAA. Under this process, for all heaters/stoves subject to subpart AAA, after testing is completed by an approved test laboratory, a certification of conformity with the particulate matter emissions standards must be issued by a third-party certifier with whom the manufacturer has entered into

contract for certification services. In order to avoid the potential for manufacturer model certification delays (and the potential for lost revenues), subpart AAA allows for automatic certification for wood heaters that meet Step 1 emission standards until the Step 2 emission standard compliance date (2020).

The third-party certifier is an independent third-party that is ISO accredited to perform certifications, inspections and audits by an accreditation body. Accredited third-party certifiers under subpart AAA must maintain records of all certification tests, QA program inspections and QA audit performance tests. The third-party certifier can certify conformity if the emission tests have been conducted per the appropriate guidelines; the test report is complete and accurate; the instrumentation used for the test was properly calibrated; the test report shows that the representative affected wood heater meets the applicable emission limits; and the QA plan prepared by the manufacturer is adequate to ensure that units within the model line will be similar in all material respects that would affect emissions to the wood heater submitted for certification testing. The third-party certifier is also required to conduct regular (at least annual) unannounced audits to ensure that the manufacturer's QA plan is being implemented and must prepare a report for each audit that fully documents the results of the audit. The manufacturer must include in its contract with the third-party certifier the authorization and requirement to submit all such reports to the Administrator. The ISO accreditation and approval to be third-party certifiers will not be required until 6 months after the effective date of the rule. We have assumed that of the 6 labs, 2 will have ISO accreditation as third-party certifiers by the effective date of the final amended rule and 2 will choose to obtain ISO accreditation as third-party certifiers during the period covered by this ICR (2015-2017).

Test laboratories that want to become approved test laboratories to conduct NSPS certification testing will need to apply for ISO accreditation as a test laboratory, conduct proficiency testing and report the results of all such testing. Accredited approved test laboratories must maintain records of all certification tests, proficiency tests and compliance audit test data. Approved test laboratories must be approved for wood heater certification under subpart AAA or must be an independent third-party test laboratory that is accredited by a nationally recognized accrediting entity to perform testing using the test methods specified in subpart AAA. The final rule allows a three-year extension of current EPA accreditations of labs (as approved test laboratories). We assume that 6 laboratories will submit applications to become approved test

labs between 2015 and 2017. Current EPA-accredited laboratories may retain their accreditation and may conduct testing as approved test labs until 3 years after the effective date of this rule. Two of the labs are assumed to already be ISO-accredited and will need to apply to be approved test laboratories for subpart AAA testing and four labs are assumed to need to obtain ISO-accreditation and apply to be approved test labs for subpart AAA testing.

This ICR assumes that there is an overlap of laboratories that will obtain accreditation and approval as approved testing laboratories and as third-party certifiers under subpart AAA. The only final amended subpart AAA testing laboratory and third-party certifier recordkeeping and reporting burden costs not passed on to the manufacturer would be the burden associated with obtaining ISO accreditation, proficiency testing and reporting required for approved test laboratories to maintain accreditation and approval as test labs, and specified recordkeeping requirements (e.g., certification tests, proficiency tests, QA program inspections, audit test results).

There are an estimated 66 existing manufacturers that will be subject to the New Residential Wood Heater NSPS. We recognize that this value may be high. We obtained information on the number of existing manufacturers by appliance type, which may double count manufacturers that make more than one type of appliance. Also, there seems to be a certain amount of consolidation in the industry. However, the number of new manufacturers, particularly outside of the United States is unknown. Therefore, we consider the total of 66 manufacturers to be a reasonable estimate of the number of new and existing manufacturers.

Manufacturers of new residential wood heating devices are required to submit applications for certification of model lines, to submit results of emissions tests conducted to demonstrate that the model lines would comply with the emission limits and produce certified units according to a QA plan approved by an independent third-party certifier. The final rule allows heaters/stove models that meet specified EPA criteria that show compliance with the Step 1 emission standards to be automatically deemed as certified to meet the Step 1 emission standards under this final rule until the Step 2 emission standards compliance date. Manufacturers must submit a notification of the initial test and biennial reports that each certified model line remains unchanged. They must also maintain records of all certification data, maintain results of QA program inspections and emissions test data, and seal and store the tested appliance.

Manufacturers are also required to apply permanent labels on each applicable unit prior to sale. These labels provide important compliance information to enforcement officials and important information to consumers for purchasing appliances. The amended rule also specifies that manufacturers have the option of using temporary labels for the cleanest heaters in order to provide consumers the ability to select wood heaters that meet or exceed the Step 2 emission standards prior to the Step 2 emissions standards 2020 compliance date. Temporary labels may also be used to indicate wood heaters that meet Step 2 emission standards based on cord wood instead of crib wood, allowing consumers to select heaters better tuned to in-home performance.

For the final amended New Residential Wood Heater NSPS, the components of the total annual responses attributable to this ICR are test notifications, applications for certification, biennial reporting for certified models, applications for accreditation, test report submittals, QA audit reports and test lab proficiency reporting for the 72 respondents (66 manufacturers and 6 testing laboratories (including both approved test laboratories and third-party certifiers)) that will be subject to the rule. The number of total annual responses for subpart AAA is estimated at 246.

(e) Bottom Line Burden Hours and Cost Tables.

(i) Respondent Tally. The bottom line respondent burden hours and costs for the 3 years (2015-2017) covered by this ICR are presented in Table 1 (located at the end of this supporting statement). The average annual burden for the recordkeeping and reporting requirements in subpart AAA for the estimated 72 respondents (66 manufacturers and 6 laboratories (including approved test labs and third-party certifiers)) that will be subject to the New Residential Wood Heater NSPS is estimated to be 2,947 person-hours, with an estimated average annual labor cost of \$250,551 (approximately \$179,000 for manufacturers, \$16,000 for third-party certifiers and \$55,000 for test laboratories) and estimated annual capital/start-up costs of \$1,466,438.

(ii) The Agency Tally. The average annual federal government cost is approximately \$32,603 for approximately 716 hours for subpart AAA. The bottom line agency burden hours and costs for the 3 years covered by this ICR are presented in Table 2 (located at the end of this supporting statement).

(iii) Variations in the Annual Bottom Line. This section does not apply since no significant variation is anticipated.

(f) Reasons for Change in Burden.

This ICR requests a reduction in 8,802 total annual labor hours (11,749¹ - 2,947) and an associated decrease in total annual respondent burden cost for reporting and recordkeeping of \$898,661 (\$1,149,212² - \$250,551). This ICR requests a decrease in the total annual capital and operation and maintenance costs of \$269,637 (\$1,736,075³- \$1,466,438). The predominant reason for the changes in costs/burden is the result of revisions to the NSPS (program changes). The amendments to subpart AAA will have several major impacts.

The first of these is the change in the number of affected appliances because of the inclusion of single burn rate stoves and all wood-burning pellet stoves. Although this change increases the number of certification applications and certification tests to be processed over the clearance period for those models that do not qualify for automatic certification with the Step 1 emission standards, it is important to note that by the final rule allowing for automatic certification with the Step 1 emission standards for those models that hold certificates that meet the EPA's criteria as meeting the Step 1 emission standards, the number of certification tests/applications in the initial three-year ICR period focuses on only those wood stove models that have not yet demonstrated that they can meet the Step 1 emission standards.

The second impact results from changes in calculating estimates for permanent labels for new models. Previously, we estimated costs for permanent labels based on the number of units shipped. Our new estimates calculate costs based on the number of model lines consistent with cost estimates provided in an analysis prepared for the Hearth, Patio & Barbecue Association (HPBA) by Ferguson, Andors & Company.⁴

The third impact results from changes to the QA requirements and use of a third-party certifier certification process. The focus in the three-year clearance period will be for manufacturers to design and certify stoves to meet the new emission limits (where necessary) as demonstrated through certification testing and to begin to implement the new QA-related provisions. The new QA and third-party certifier certification process provisions of the revised subpart AAA are implemented in order to ensure initial and continuing compliance with the

¹ NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (Renewal), EPA ICR Number 1176.11, OMB Control Number 2060-0161. (See http://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=201311-2060-010)

² See Footnote 11.

³ See Footnote 11.

⁴ Ferguson, Robert (Ferguson, Andors & Company), prepared for the Hearth, Patio & Barbecue Association. *Proposed Wood Heater NSPS Incremental Cost Effectiveness Analyses*, Appendix A: Woodstove Cost Modeling. (Available at <http://www.regulations.gov#!documentDetail:D=EPA-HQ-OAR-2009-0734-1643>); Page 8, Table 5. Fixed Costs per Model: Certification). May 2014.

applicable emission limits. In the long run, the combination of the use of ISO third-party certifier and test laboratories should streamline the certification and accreditation process for the industry and laboratories and decrease the amount of time spent by the EPA in reviewing QA-related documents. These changes, combined with increasing automation and experience in complying with this standard result in less capital and operation and maintenance costs as well as recordkeeping and reporting burden.

The fourth impact results from changes to streamline reporting and recordkeeping requirements to those that are essential for implementation and enforcement of the rule and that reflect the agency's experience under the current subpart. For example, we no longer use the number of units sold as the trigger for model line QA audits, so it is no longer important for retailers to track the number of units sold. These changes reduce industry burden, while simultaneously not affecting the agency's ability to enforce the standard. We have also carefully reviewed the requirements included in this supporting statement to focus on activities that routinely occur. For example, revocation of certification and/or laboratory accreditation is extremely rare and is not reflected in this estimate of reporting and recordkeeping. Instead, we have focused on the routine activities that serve to demonstrate that sources are in compliance with the rule.

The fifth impact results from changes in labor rates used. The labor rates used are greater for managerial and slightly less for technical and clerical than those used in the currently approved ICR based on May 2013 labor rates obtained from the Bureau of Labor Statistics for the Ventilation, Heating, Air-Conditioning and Commercial Refrigeration Equipment Manufacturing (NAICS 333400).¹

(g) Burden Statement

The average annual respondent burden for the final Residential Wood Heating NSPS is approximately 41 hours with an approximate average annual burden per response of 12 hours.

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

¹ May 2013 *National Industry-Specific Occupational Employment and Wage Estimates*. Located http://www.bls.gov/oes/current/naics4_333400.htm.

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 currently valid OMB control number. The OMB control numbers for EPA's regulations in 40 CFR part 60 are listed in 40 CFR part 9.

To comment on the agency's need for this information, the accuracy of the provided burden estimates and any suggestions for minimizing respondent burden, including through the use of automated collection techniques, the EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2009-0734, which is available for online viewing at <http://www.regulations.gov>, or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA WJC West Building, 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 EPA Docket is (202) 566-1742. An electronic version of the public docket is available at <http://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, NW, Washington, DC 20503, Attention Desk Officer for EPA. Please include the relevant Docket ID Number (EPA-HQ-OAR-2009-0734) and OMB Control Number (2060-0161) in any correspondence.

PART B

This section is not applicable because statistical methods are not used in data collection associated with this final rule.

TABLE 1. THREE-YEAR AND ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS OF THE FINAL RULE (2015-2017)											
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
	Person-	No. of	Person-hours	Respondents	Technical	Management	Clerical	Cost,\$ ^b	Total	Avg. annual	Avg. annual
	hours per	occurrences	per respondent	2015-2017	person-hours	person-hours ^a	person-hours ^a	2015-2017	person-hours	person-hours	costs
Activity	occurrence	per respondent	2015-2017		2015-2017	2015-2017	2015-2017		2015-2017		
		2015-2017	(C=AxB)		(E=CxD)	(F=Ex0.05)	(G=Ex0.1)		(I=E+F+G)	(J=I/3)	(K=H/3)
Reporting Requirements											
Manufacturers											
1. Certification test notification ^c	2.00	1.9	3.8	66	252.5	12.6	25.3	\$ 24,691	290.4	96.8	\$ 8,230
2. Application for certification ^d	8.00	1.9	15.3	66	1,010.0	50.5	101.0	\$ 98,763	1,161.5	387.2	\$ 32,921
3. Biennial reporting ^e	2.00	4.1	8.2	66	540.0	27.0	54.0	\$ 52,804	621.0	207.0	\$ 17,601
4. EPA compliance audit testing ^f	8.00	1.0	8.0	1	8.0	0.4	0.8	\$ 782	9.2	3.1	\$ 261
5. QA performance test results ^g	2.00	1.0	2.0	66	132.0	6.6	13.2	\$ 12,908	151.8	50.6	\$ 4,303
6. QA annual audit reports ^h	20.00	16.5	330.0	4	1,320.0	66.0	132.0	\$ 129,077	1,518.0	506.0	\$ 43,026
7. Review annual QA audit report ⁱ	4.00	1.0	4.0	66	264.0	13.2	26.4	\$ 25,815	303.6	101.2	\$ 8,605
Test Laboratories											
1. Application for test lab approval ^j											
a. Already has ISO accreditation	20.00	1.0	20.0	2	40.0	2.0	4.0	\$ 3,911	46.0	15.3	\$ 1,304
b. Needs to obtain ISO accreditation	80.00	1.0	80.0	4	320.0	16.0	32.0	\$ 31,291	368.0	122.7	\$ 10,430
2. Biennial proficiency testing and report development ^k	150.00	1.0	150.0	6	900.0	45.0	90.0	\$ 88,007	1,035.0	345.0	\$ 29,336
Third-Party Certifier											
1. Application for approval as a third-party certifier ^l											
a. Already has ISO accreditation	20.00	1.0	20.0	2	40.0	2.0	4.0	\$ 3,911	46.0	15.3	\$ 1,304
b. Needs to obtain ISO accreditation	80.00	1.0	80.0	2	160.0	8.0	16.0	\$ 15,646	184.0	61.3	\$ 5,215
Subtotal for Reporting Requirements					4,986.5	249.3	498.7	\$ 487,607	5,734.5	1,911.5	\$ 162,536
Recordkeeping Requirements											
Manufacturers											
1. Test documentation ^m	1.00	4.1	4.1	66	270.0	13.5	27.0	\$ 26,402	310.5	103.5	\$ 8,801
2. QA parameter inspections ⁿ	2.00	12.0	24.0	66	1,584.0	79.2	158.4	\$ 154,892	1,821.6	607.2	\$ 51,631
3. Retained (sealed) stoves ^o	1.00	1.9	1.9	66	126.3	6.3	12.6	\$ 12,345	145.2	48.4	\$ 4,115
Test Laboratories											
1. Certification test, proficiency test, and audit test results ^p	2.00	36.0	72.0	6	432.0	21.6	43.2	\$ 42,243	496.8	165.6	\$ 14,081
Third-Party Certifier											
1. Certification test, QA program inspection and audit tests ^q	2.00	36.0	72.0	4	288.0	14.4	28.8	\$ 28,162	331.2	110.4	\$ 9,387
Subtotal for Recordkeeping Requirements					2,700.3	135.0	270.0	\$ 264,045	3,105.3	1,035.1	\$ 88,015
TOTAL BURDEN AND COST (SALARY)					7,686.8	384.3	768.7	\$ 751,652	8,839.8	2,946.6	\$ 250,551
TOTAL NUMBER OF RESPONSES							2015-2017	738		Annual avg.	246

^a Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

^b Costs are based on the following hourly rates: technical at \$85.41, management at \$148.70 and clerical at \$49.36.

^c Models certified by testing per manufacturer: Assumes that 90% of existing adjustable burn rate models (.9 X 125 models = 112.5)(34 manufacturers), 25% of existing pellet stove models (.25 X 125 models = 31.25)(29 manufacturers), and 0% of single burn rate stove models (0 X 20 = 0) (3 manufacturers) will not need to test and apply to certify to meet limits during the three-year ICR period (2015-2017). We assume that manufactures will test and apply to meet limits for 126 models during the three-year ICR period (2015-2017) in order to replace old models that will not meet the 2015 compliance emission standards.

^d Model applications per manufacturer: 126 model lines (see table note "c") from 66 manufacturers projected from 2015-2017.

^e For purposes of this ICR, we assume that 270 models will either test and apply to certify to meet limits or will obtain a conditional approval as meeting limits. We have assumed 2 hours per report, and that 1 biennial report will be required for all 270 models (66 manufactures) during the three-year ICR period (2015-2017).

^f Assumes that one of the 66 manufacturers will be required to undergo an EPA compliance audit test for one of their models during the three-year ICR period (2015-2017).

^g Assumes that there will be one QA audit performance test per manufacturer (66 manufacturers) under the QA program during the period covered by this ICR (2015-2017). We assume that each of the 66 manufacturers will be required to test one model and report results to the EPA under their QA program between 2015 and 2017.

^{h,i} Assumes there will be one QA audit by the third-party certifier for each of the 66 manufacturers over the three-year ICR period (2015-2017) and that each of these audit reports will be reviewed by the manufacturer (in all cases) and may require preparing a response to the audit (in cases where deficiencies are identified). It is assumed that the third-party certifier will audit multiple manufacturer models when they conduct their audits (thereby reducing the time needed to audit manufacturers and their associated models).

^j Assumes that 6 laboratories will submit applications to be approved as test laboratories for subpart AAA during the three-year ICR period (2015-2017). We assume that two of those laboratories will already be ISO-accredited as test laboratories and four will need to obtain ISO-accreditation as test laboratories.
^k We assume there will be one biennial proficiency test and report per testing lab (6 labs) required during the three-year ICR period (2015-2017).
^l We assume that 4 laboratories will submit applications for approval as third-party certifiers between 2015 and 2017. Two of those laboratories will be ISO-accredited and two will need to obtain ISO-accreditation.
^m We have assumed that manufacturers will spend one hour per certification test (for 270 models) to keep the required records.
ⁿ Parameter inspections are part of the existing safety inspection program. We have assumed each of the 66 wood stove manufacturers that certifies model lines between 2015-2017 will spend an additional 2 hours per quarter during the 3-year period of this ICR (2015-2017) to document results.
^o It is assumed that one stove is sealed and retained for each certification test (assuming 126 certification tests) required of the 66 manufacturers that certify to meet limits (does not include models that obtain automatic certification).
^p We expect the required recordkeeping to be highly automated and have assumed that test laboratories (6 laboratories) will spend 2 hours per month for the 3-year period of this ICR to maintain the required records.
^q We expect the required recordkeeping to be highly automated and have assumed that third-party certifiers (4 third party certifiers) will spend 2 hours per month for the 3-year period of this ICR to maintain the required records.

TABLE 2. THREE-YEAR ANNUAL BURDEN AND COST TO THE FEDERAL GOVERNMENT OF THE FINAL RULE											
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
	EPA person-	No. of	EPA person-	Respondents	Technical	Management	Clerical	Cost, \$ ^b	Total	Avg. annual	Avg. annual
	hours per	occurrences	hours per	2015-2017	person-hours	person-hours ^a	person-hours ^a	2015-2017	person-hours	person-hours	costs, \$
	occurrence	per respondent	respondent		2015-2017	2015-2017	2015-2017		2015-2017	2015-2017	
Activity		2015-2017	2015-2017		(E=CxD)	(F=Ex0.05)	(G=Ex0.1)		(I=E+F+G)	(J=I/3)	(K=H/3)
1. Certification test notification ^c	0.5	1.9	1.0	66	63.1	3.2	6.3	\$3,304	72.6	24.2	\$ 1,101
2. Certification test ^d	20.0	1.9	38.3	6	229.5	11.5	23.0	\$12,015	264.0	88.0	\$ 4,005
3. Application for certification of model line ^e	8.0	1.9	15.3	66	1,010.0	50.5	101.0	\$52,865	1,161.5	387.2	\$ 17,622
4. Biennial reporting for certified models ^f	1.0	4.1	4.1	66	270.0	13.5	27.0	\$14,132	310.5	103.5	\$ 4,711
5. Review and approval of test lab credentials ^g	4.0	1.0	4.0	6	24.0	1.2	2.4	\$1,256	27.6	9.2	\$ 419
6. Review test lab biennial proficiency test reports ^h	10.0	1.0	10.0	6	60.0	3.0	6.0	\$3,140	69.0	23.0	\$ 1,047
7. Review QA performance test results ⁱ	2.0	1.0	2.0	66	132.0	6.6	13.2	\$6,909	151.8	50.6	\$ 2,303
8. Review QA audit report ^j	2.0	1.0	2.0	4	8.0	0.4	0.8	\$419	9.2	3.1	\$ 140
9. EPA Compliance Audit ^k	40.0	1.0	40.0	1	40.0	2.0	4.0	\$2,094	46.0	15.3	\$ 698
10. Review and approval of third-party certifier credentials ^l	8.0	1.0	8.0	4	32.0	1.6	3.2	\$1,675	36.8	12.3	\$ 558
TOTAL BURDEN AND COST (SALARY)					1,868.7	93.4	186.9	\$97,809	2,149.0	716.3	\$ 32,603

^a Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

^b Costs are based on the following hourly rates: technical at \$46.67, management at \$62.90, and clerical at \$25.24.

^c Models certified by testing per manufacturer: 126 model lines from 66 manufacturers projected during the three-year ICR period (2015-2017). Assumes that it will take 30 minutes to review certification test notifications.

^d Assumes that over the long term the EPA will observe 5 percent of certification tests (126 X .05) conducted during the ICR reporting period, which is rounded to 6 tests observed during the period of this ICR (2015-2017).

^e EPA must review and approve certification applications: 126 model lines from 66 manufacturers during the three-year ICR period (2015-2017).

^f Assumes that the EPA will receive one biennial report for 270 models (66 manufacturers) over the 3-year ICR period (2015-2017).

^g Assumes that 6 test laboratories will submit applications for subpart AAA testing approval (2 that already have ISO accreditation and 4 that do not) between 2015 and 2017.

^h Assumes that there will be one biennial laboratory proficiency test per laboratory (6 laboratories) during the three-year ICR period (2015-2017).

ⁱ Assumes that there will be 66 QA emissions test results submitted under the QA program and reviewed by the EPA during the period covered by this ICR (2015-2017). We assume that each of the 66 manufacturers will be required to test one model and report results to the EPA under their QA program between 2015 and 2017.

^j Assumes there will be one QA audit by the third-party certifier reviewed by the EPA for each of the 66 manufacturers over the three-year ICR period (2015-2017).

^k Assumes that one model line for one of the 66 manufacturers will be audited by the EPA during the ICR three-year period (2015-2017).

^l EPA approval of third-party certifiers for this rule: We assume that 4 labs will submit applications for approval to the EPA as third-party certifiers during the three-year ICR period (2015-2017).

Attachment 1
Respondent Reporting and Recordkeeping Requirements
NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA) (Revision)

Regulatory Reference Title 40, Part 60	Regulated Entity	Reporting/Recordkeeping Requirement	Frequency/Other Comments
60.533(b), 60.533(f)(1)	Manufacturer	<u>Report</u> : Application for a certificate of compliance. Report is to include results of certification test, model identification information, engineering drawings and component emissions specifications (for components that may affect emissions), identification of CBI (as necessary), warranty information, owner's manual, documentation of contract with approved laboratory and third-party certifier, quality assurance (QA) program and various other affirmations of compliance.	Once for each model line.
60.533(g)*	Manufacturer	<u>Report</u> : Waiver from submitting test results. May apply for a waiver of the requirement to submit the results of a certification test.	Once per model, if at all.
60.533(i)	Manufacturer	<u>Report</u> : Renewal of certification. Renewal of certificate allowed by reapplying or by affirming in writing that the wood heater has been subject to no changes that would impact emissions and requesting a waiver from certification testing.	Must renew or apply for recertification every 5 years.
60.533(k)**	Manufacturer	<u>Report</u> : Recertification required whenever a change in heater design exceeds specified parameters. May request a waiver with adequate rationale that changes may not reasonably be anticipated to cause wood heaters in the model line to exceed the applicable emission limits.	Variable.
60.533(m)	Manufacturer	<u>Report</u> : Develop a QA program and submit with the application for a certificate of compliance. <u>Report</u> : Review third-party certifier QA audit report and submit corrective actions for any identified deficiencies.	Once per model line. Variable.
60.533(n)**	Manufacturer	<u>Report</u> : EPA compliance audit test results. EPA may select a wood heater for compliance audit testing. EPA may test or direct the manufacturer to test a selected model line; at manufacturer's expense.	Variable and infrequent.
60.534(g)	Manufacturer	<u>Report</u> : Notification of in advance of compliance certification test.	Once for each model line, at least 30 days before the start of testing.
60.536(a)	Manufacturer	Produce and apply permanent label.	One per unit produced.

Regulatory Reference Title 40, Part 60	Regulated Entity	Reporting/Recordkeeping Requirement	Frequency/Other Comments
60.536(f)***	Manufacturer	<u>Optional requirement.</u> Produce and apply temporary label.	Variable/optional. - Each model that meets 2020 emission limits prior to the 2020 compliance date may display a temporary label indicating that the model meets the 2020 emission limits. - Each model certified to meet the 2020 cord wood alternative means of emissions limitation compliance option may display that the model meets the 2020 cord wood alternative compliance option.
60.536(g)	Manufacturer	Develop and publish owner’s manual.	One owner’s manual developed per model line; a copy accompanies each unit produced.
60.537(a)	Manufacturer	Maintain records of all certification test data, results of QA program inspections and emission test data.	Once per model for certification test data. Periodically for QA inspections and tests.
60.537(c)	Manufacturer	Retain sealed wood heater at facility for 5 years after certification test of model.	One for each model certified.
60.537(d)	Manufacturer	<u>Report:</u> Certification that model line is unchanged and sales data for each model by state.	Every 2 years following issuance of a certificate of compliance for each model line.
60.537(f)	Manufacturer	<u>Report:</u> Performance test data submitted electronically	Within 60 days after completion of each performance test.
60.537(g)	Manufacturer	For each certified model line, post the non-CBI certification test report to the manufacturer’s website	Once for each model line, within 30 days of receiving the certificate of compliance.
60.539**	Manufacturer	Various requests, submittals, motions, filings, etc., under hearing and appeal procedures.	Variable and infrequent, if at all.
60.535(a)	Test Laboratory	<u>Report:</u> After being accredited by a nationally recognized accrediting entity, application for EPA approval as a test lab. Laboratories previously accredited by the EPA may continue to be accredited and deemed EPA approved for testing under this rule until 3 years after the effective date of the rule.	Once (unless not renewed every 5 years by the EPA).
60.535(a)(2)(i), 60.537(b)	Test Laboratory	<u>Report:</u> Proficiency test and documentation. Approved test labs must participate in a biennial proficiency testing program conducted by a nationally recognized accrediting entity. Each approved test laboratory must submit all proficiency test results to the EPA.	Biennially.
60.537(b)	Test Laboratory	Keep records of documentation pertaining to certification tests, QA audit tests, including the full test report and raw data sheets, technician notes, calculations, and test results for all test runs	Once for each certification test, QA audit test.
60.539**	Test Laboratory	Various requests, submittals, motions, filings, etc.,	Variable and infrequent, if at all.

Regulatory Reference Title 40, Part 60	Regulated Entity	Reporting/Recordkeeping Requirement	Frequency/Other Comments
60.533(m), 60.535(e)(2)	Third-Party Certifier	under hearing and appeal procedures. <u>Report:</u> Submit report of unannounced QA program audits to EPA and the manufacturer	At least annually.
60.535(e)	Third-Party Certifier	<u>Report:</u> After being accredited by a nationally recognized accrediting entity, application for EPA approval as a third-party certifier.	Once, to be renewed every 5 years.
60.537(b)	Third-Party Certifier	Keep records of documentation pertaining to certification tests, QA inspection and audit tests, including the full test report and raw data sheets, technician notes, calculations, and test results for all test runs.	Once for each certification test, QA/QC inspection and audit test.
60.537(b)	Third-Party Certifier	<u>Report:</u> Each certifier must submit each certification test, QA inspection report and ISO IEC accreditation credentials to the EPA.	Once for each certification test, QA/QC inspection and audit test.
60.539**	Third-Party Certifier	Various requests, submittals, motions, filings, etc., under hearing and appeal procedures.	Variable and infrequent, if at all.

* 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.

*** This is an optional requirement and, therefore, is not included in the calculated burden estimates.

Attachment 2
Federal Reporting and Recordkeeping Requirements
NSPS for New Residential Wood Heaters (40 CFR part 60, subpart AAA) (Revision)

Regulatory Reference Title 40, Part 60	Agency	Reporting/Recordkeeping	Frequency/Other Comments
60.533(c)(1) or (2), 60.533(f)(2) or (3)	EPA	<u>Report</u> : Review application for a certificate of compliance and issue the certificate or a notice of denial.	Once per model line.
60.533(i)(3) or (4)	EPA	<u>Report</u> : Renewal or denial of certificate of compliance.	Every 5 years.
60.533(l)(2)*	EPA	<u>Report</u> : Notice of revocation of certification.	Variable and infrequent, if at all.
60.533(n)(1)(ii)	EPA	<u>Report</u> : Notice to manufacturer that a model has been selected for an EPA compliance audit test.	Variable and infrequent
60.533(n)(3)*	EPA	<u>Report</u> : Notification of suspension or revocation of a model's certification.	Variable and infrequent, if at all.
60.535(a)	EPA	<u>Report</u> : Review test laboratory application and provide the test laboratory with a certificate of approval if approval criteria are met. If approval not granted, provide written notice with rationale.	Test lab approval (unless revoked sooner) is valid for 5 years from the date of issuance.
60.535(b)(2)*	EPA	Notice of intention to revoke test laboratory approval with justification and basis.	Variable and infrequent, if at all.
60.535(e)(3)	EPA	<u>Report</u> : Review of third-party certifier application and provide a certificate of approval if approval criteria met. If approval not granted, provide a written notice with rationale.	Third-party certifier approval expires 5 years after being issued unless renewed.
60.535(f)(2)*	EPA	Notice of intention to revoke third-party certifier approval with justification and basis.	Variable and infrequent, if at all.
60.537(b)	EPA	Evaluation of laboratory proficiency tests submitted by test laboratories.	Biennially.
60.539*	EPA	Various requests, submittals, motions, filings, etc., under hearing and appeal procedures.	Variable and infrequent, if at all.

* This is not a routine occurrence. 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.