

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Petroleum Dry Cleaners (40 CFR Part 60, Subpart JJJ) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NSPS for Petroleum Dry Cleaners (40 CFR Part 60, Subpart JJJ) (Renewal),  
EPA ICR Number 0997.11, OMB Control Number 2060-0079.

**1(b) Short Characterization/Abstract**

The New Source Performance Standards (NSPS) for Petroleum Dry Cleaners were proposed on December 14, 1982, promulgated on September 21, 1984, and amended on October 17, 2000. These regulations apply to the following existing and new facilities located at a petroleum dry cleaning plant with a total manufacturers' rated dryer capacity equal to or greater than 38 kilograms (84 pounds): petroleum solvent dry cleaning dryers, washers, filters, stills, and settling tanks. New facilities include those that commenced construction or modification after the date of proposal. A dryer installed between December 14, 1982, and September 21, 1984, in a plant with an annual solvent consumption level of less than 17,791 liters (4,700 gallons), is exempt from the requirements of this subpart. This information is being collected to assure compliance with 40 CFR Part 60, Subpart JJJ.

In general, all NSPS standards require initial notification reports, 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 NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two 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.

The respondents to this ICR (the "Affected Public") are publicly-owned and -operated petroleum dry cleaning facilities. None of these facilities are owned by either state, or local and tribal agencies, or the Federal government. The "burden" to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Petroleum Dry Cleaners (40 CFR Part 60, Subpart JJJ) (Renewal). The Federal Government burden is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NSPS for Petroleum Dry Cleaners (40 CFR Part 60, Subpart JJJ) (Renewal).

Over the next three years, we estimate there are approximately 1,000 existing facilities and 20 new facilities per year. The rule only imposes one-time requirements for new sources.

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

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

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

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

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years. In 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, volatile organic compound (VOC) emissions from petroleum dry cleaning facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart JJJ.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in these standards 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 standards. Continuous emission monitors are used to ensure compliance with the standards 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 these standards 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, leaks are being detected and repaired, and the standard is being met. The performance test may also be observed.

The required reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

### **3. Non-duplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart JJJ.

#### **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 (79 FR 30117) on May 27, 2014. No comments were received on the burden published in the Federal Register.

#### **3(c) Consultations**

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting

provisions in the standard is the Integrated Compliance Information System (ICIS), which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of all compliance data.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we contacted the National Cleaners Association, at (212) 967-3002, and the Drycleaning and Laundry Institute (DLI), at (800) 638-2627.

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.

### **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 these standards 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 petroleum dry cleaning facilities. The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standard are listed in the table below.

<b>Standard (40 CFR Part 60, Subpart JJJ)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Coin-Operating Laundry and Drycleaning	7215	812310
Drycleaning Plants, Except Rug Cleaning	7216	812320
Industrial Launderers	7218	812332

#### **4(b) Information Requested**

##### **(i) Data Items**

In this ICR, all the data that is recorded or reported is required by the NSPS for Petroleum Dry Cleaners (40 CFR Part 60, Subpart JJJ).

A source must make the following reports:

<b>Notifications</b>	
Notification of construction/reconstruction	60.7(a)(1)
Notification of actual startup	60.7(a)(3)
Notification of initial performance test	60.8(d)
Notification of physical or operational change	60.7(a)(4)

<b>Reports</b>	
Initial performance test results	60.8(a)
Repeat performance test results	60.8(a)

A source must keep the following records:

<b>Recordkeeping</b>	
Record of startup, shutdown, and malfunctions	60.7(b)
Record of initial and repeat performance tests	60.625
Records are required to be retained for two years	60.7(f)

## 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.

### **(ii) Respondent Activities**

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

## **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:

<b>Agency Activities</b>
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 Enforcement and Compliance History Online (ECHO) and ICIS.

### **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 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 reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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 two years.

### **5(c) Small Entity Flexibility**

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. The exact number of small entities affected by this rule could not be determined, based on review of the following sources: the promulgated rule notice in the Federal Register; the *Petroleum Dry Cleaners – Background Information for Proposed Standards* (1982); and a search of publicly available current data sources. The petroleum dry cleaning industry comprises both commercial facilities (most of which are small entities) and industrial facilities (most of which are large entities). 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 – NSPS for Petroleum Dry Cleaners (40 CFR Part 60, Subpart JJJ) (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 1,850 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 NSPS program, the previously approved ICR, and any comments received.

#### **6(b) Estimating Respondent Costs**

##### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$129.93 (\$61.87 + 110%)
Technical	\$103.97 (\$49.51 + 110%)
Clerical	\$51.79 (\$24.66 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2014, “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 only costs to this regulated industry resulting from information collection activities required by the subject’s standards are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance costs.

**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 \$32,700.

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

Managerial	\$62.90 (GS-13, Step 5, \$39.31 + 60%)
Technical	\$46.67 (GS-12, Step 1, \$29.17 + 60%)
Clerical	\$25.25 (GS-6, Step 3, \$15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2015 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 – NSPS for Petroleum Dry Cleaners (40 CFR Part 60, Subpart JJJ) (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 20 respondents per year will be subject to the standard. These respondents are new sources and have only one-time reporting requirements. The overall average number of respondents, as shown in the table below, is 20 per year.

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

Number of Respondents		

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	20	0	0	0	20
2	20	0	0	0	20
3	20	0	0	0	20
Average	20	0	0	0	20

<sup>1</sup> New respondents 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 20.

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

<b>Total Annual Responses</b>				
(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
Notification of construction/reconstruction	20	1	0	20
Notification of actual startup	20	1	0	20
Notification of initial performance test	20	1	0	20
Report of performance test	20	1	0	20
Report of repeat of performance test	4	1	0	4
			Total	84

The number of Total Annual Responses is 84.

The total annual labor costs are \$186,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Petroleum Dry Cleaners (40 CFR Part 60, Subpart JJJ) (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 in Tables 1 and 2, respectively, and summarized below.

### **(i) Respondent Tally**

The total annual labor hours are 1,850 hours at a cost of \$186,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Petroleum Dry Cleaners (40 CFR Part 60, Subpart JJJ) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 22 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. 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 the next three years is estimated to be 718 labor hours at a cost of \$32,700. See below Table 2: Average Annual EPA Burden and Cost – NSPS for Petroleum Dry Cleaners (40 CFR Part 60, Subpart JJJ) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

### **6(f) Reasons for Change in Burden**

The small increase in labor hours from the most recently approved ICR is due to rounding. In this ICR, we rounded the total annual burden and cost to three significant figures. In addition, we have updated all calculations using the latest labor rates, which results in an adjustment increase in total labor costs.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 22 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-2014-0031. 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), WJC 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-2014-0031 and OMB Control Number 2060-0079 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 – NSPS for Petroleum Dry Cleaners (40 CFR Part 60, Subpart JJJ) (Renewal)**

Burden item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person- hours per respondent per year (AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technica l person- hours per year (Cx D)	(F) Managemen t person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.01 )	(H) Cost, \$ <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with rule requirement	See 4E							
B. Required activities								
Initial performance test <sup>c, d</sup>	61	1	61	20	1,220	61	122	\$141,087.51
Repeat of performance test <sup>c, d, e</sup>	61	1	61	4	244	12.2	24.4	\$28,217.50
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Notification of construction/ modification <sup>c, f</sup>	2	1	2	20	40	2	4	\$4,625.82
Notification of actual startup <sup>c, f</sup>	2	1	2	20	40	2	4	\$4,625.82
Notification of initial performance test <sup>c, f</sup>	2	1	2	20	40	2	4	\$4,625.82
Report of performance test	See 3B							
<b>Subtotal for Reporting Requirements</b>					<b>1,822</b>			<b>\$183,182.47</b>
4. Recordkeeping requirements								
A. Familiarize with rule requirement	See 3A							
B. Plan activities	See 4C							
C. Implement activities	See 3B							

Burden item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person- hours per respondent per year (AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technica l person- hours per year (Cx D)	(F) Managemen t person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.01 )	(H) Cost, \$ <sup>b</sup>
D. Develop record system	N/A							
E. Time to enter information								
Record of all performance tests <sup>c, g</sup>	1	1.2	1.2	20	24	1.2	2.4	\$2,775.49
F. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>28</b>		<b>\$2,775.49</b>
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>h</sup></b>						<b>1,850</b>		<b>\$186,000</b>
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)): <sup>h</sup></b>								<b>\$0</b>
<b>TOTAL COST: <sup>h</sup></b>								<b>\$186,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 1,000 existing sources that are currently subject to the rule with an estimated 20 new additional sources per year over the next three years. The rule stipulates that only new sources with one-time-only requirements are subject to this subpart. We therefore, concluded that the number of respondents for this renewal ICR is 20 sources per year.

<sup>b</sup> This ICR uses the following labor rates: \$129.93 per hour for Executive, Administrative, and Managerial labor; \$103.97 per hour for Technical labor, and \$51.79 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2014, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> This is a one-time only activity.

<sup>d</sup> We have assumed that it will take 61 hours for each respondent to complete the required activity.

<sup>e</sup> We have assumed that 20 percent of respondents will have to repeat initial performance tests due to failure.

<sup>f</sup> We have assumed that it will take 2 hours for respondents to write report.

<sup>g</sup> We have assumed that it will take each respondent one hour to enter information on all performance tests.

<sup>h</sup>Totals have been rounded to 3 significant values. Figures may not add exactly due to rounding.

**Table 2: Average Annual EPA Burden and Cost – NSPS for Petroleum Dry Cleaners (40 CFR Part 60, Subpart JJJ) (Renewal)**

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person-hours per year (CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
1. Initial performance test	16	1	16	20	320	16	32	\$16,748.80
2. Repeat performance test <sup>c,d</sup>	16	1	16	4	64	3.2	6.4	\$3,349.76
3. Report review								
Notification of construction/reconstruction <sup>c</sup>	2	1	2	20	40	2	4	\$2,093.60
Notification of actual startup <sup>c</sup>	1	1	1	20	20	1	2	\$1,046.80
Initial performance test <sup>c,e</sup>	7.5	1	7.5	20	150	7.5	15	\$7,851.00
Repeat performance test <sup>c,f</sup>	7.5	1	7.5	4	30	1.5	3	\$1,570.20
<b>TOTAL ANNUAL BURDEN AND COST (rounded) <sup>h</sup></b>						<b>718</b>		<b>\$32,700</b>

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 1,000 existing sources that are currently subject to the rule with an estimated 20 new additional sources per year over the next three years. The rule stipulates that only new sources with one-time-only requirements are subject to this subpart. We therefore, concluded that the number of respondents for this renewal ICR is 20 sources per year.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$62.90 (GS-13, Step 5, \$39.31 + 60%), Technical rate of \$46.67 (GS-12, Step 1, \$29.17 + 60%), and Clerical rate of \$25.25 (GS-6, Step 3, \$15.78 + 60%). These rates are from the Office of Personnel Management (OPM) “2011 General Schedule” which excludes locality rates of pay.

<sup>c</sup> This is a one-time only activity.

<sup>d</sup> We have assumed that 20 percent of respondents will have to repeat performance test

<sup>e</sup> We have assumed that each respondent will take 7.5 hours to review the initial performance test report.

<sup>f</sup> We have assumed that 20 percent of respondents will have to review the repeat performance test report.

<sup>h</sup> Totals have been rounded to 3 significant values. Figures may not add exactly due to rounding.



