

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal), EPA ICR Number 1415.11, OMB Control Number 2060-0234.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Perchloroethylene Dry Cleaning Facilities were proposed on December 9, 1991, promulgated on September 22, 1993, and last-amended on July 11, 2008. The EPA has reviewed these standards under sections 112(d) (6) and 112(f) of the Clean Air Act and, effective July 27, 2006, established additional monitoring requirements beyond those promulgated on September 22, 1993. The additional requirements are to implement an enhanced leak detection and repair (LDAR) program under which monthly leak detection using handheld instruments is performed. These regulations apply to existing and new dry cleaning facilities that use perchloroethylene (PCE). New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart M.

In general, all NESHAP 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 NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents, and retain the file for at least five years following the generation date of such 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 “burden” to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal). The Federal Government’s “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 – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal).

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Approximately 28,012 sources are currently subject to these standards, of which 12 are major sources and the remainder are area sources. Of the 28,000 area sources, 8,000 are located in states (California, Maine, New York, Rhode Island) that already require an enhanced LDAR program; therefore, the monthly LDAR requirement of the NESHAP will affect 20,000 existing area sources. No new major sources are expected over the next three years. We estimate that 2,330 additional area sources per year will become subject to the regulation in the next three years, but that the overall number of facilities will remain constant due to the retirement of old existing facilities.

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 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

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

In the Administrator's judgment, PCE emissions from perchloroethylene dry cleaning facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart M.

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 these same 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 the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the standards are 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 63, Subpart M.

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 (80 FR 32116) on June 5, 2015. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and

reporting provisions in the standard, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we contacted both the Halogenated Solvents Industry Alliance, Inc., at (703) 741-5780; and the Drycleaning & Laundry Institute, at (301) 622-1900.

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. In this case, no comments were received.

3(d) Effects of Less Frequent Collection

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less-frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

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

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are perchloroethylene dry cleaning facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below.

Standard (40 CFR Part 63, Subpart M)	SIC Codes	NAICS Codes
Coin-Operated Laundries and Drycleaners	7215	812310
Drycleaning and Laundry Services (except Coin-Operated)	7211, 7212, 7216, 7219, 7251, and 7389	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 NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M).

A source must make the following reports:

Notifications	
Initial notifications	63.324(a)
Initial report requirements	63.324(a)
Notification of Compliance Status	63.324(b) 63.324(f)
Facility status change	63.324(c)
Exceedance of solvent consumption exemption level	63.324(c)

A source must keep the following records:

Recordkeeping	
Monthly enhanced LDAR	63.322(o)
Date of repairs or purchase orders for repairs	63.324(d)(4)
Solvent purchases per month and calculation of yearly PCE consumption	63.324(d)
Weekly or biweekly inspections	63.324(d)
Date of repairs or purchase orders for repairs	63.324(d)
Monitoring of control equipment.	63.324(d)
Design specification and operating manual for dry cleaning systems and emission control device	63.324(e)
All reports and notifications	63.10(b)
Record of applicability	63.10(b)(3)

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

Respondent Activities
Familiarization with the regulatory requirements.
Complete monthly LDAR using a handheld instrument.
Adjust existing ways to comply with any previously applicable instructions and requirements.
Modify the existing recordkeeping system for the purpose of recording results of monthly enhanced LDAR.
Enter information required to be recorded above.
Install, calibrate, maintain, and operate control device and LDAR instruments.
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.

Respondent Activities
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the 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 standards, 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 five years.

5(c) Small Entity Flexibility

The majority of respondents are small entities (e.g., small businesses). According to the Federal Register Notice for the 2006 final rule (71 FR 42742), "... over 99 percent of commercial dry cleaning firms are small." When developing the 2006 revisions, EPA took special steps to ensure that the burden imposed on small entities was reasonable. The EPA conducted several meetings with industry trade associations to discuss regulatory options and the corresponding recordkeeping and reporting. In addition, for the 1993 promulgated standards, an in depth economic analysis (comparable to a Regulatory Flexibility Analysis) was conducted and documented in "Economic Impact of Regulatory Control in the Dry Cleaning Industry," (EPA 45/3 91 021). Because of the large number of small businesses in this industry, the reporting requirements for the individual cleaning facilities are minimal. There are no quarterly, semiannual, or annual reporting requirements as there are with most regulated large industries. The burden is further minimized since costly monitoring equipment, such as a continuous monitor, is not required. To complete monthly enhanced LDAR, area source dry cleaning facilities may use a halogenated leak detector, instead of a more costly PCE gas analyzer as required for major sources.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (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 1,590,000 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$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 type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

Dry cleaning facilities must use a handheld instrument to conduct leak detection on a monthly basis. Major sources must use a PCE gas analyzer (photo ionization detector (PID), flame ionization detector, or infrared analyzer) to perform leak checks according to Method 21 on a monthly basis, while area sources may use a halogenated hydrocarbon leak detector (HHD), which is less expensive than the gas analyzer required for major sources. Capital/startup costs for new area sources include the purchase of the respective monitor. There are 2,330 new area sources and no new major sources expected in the next three-year ICR period.

Annual O&M costs for the monitors apply to both new and existing sources because these costs are incurred each year. For the 8,000 area source facilities that are in those states that already require an enhanced LDAR program, this ICR does not estimate capital and annual O&M costs for the monitors. The annual costs for postage are applied to new sources and sources with exceedances that must submit reports. All other existing sources must only keep

records, and, as such, an annual photocopying charge is assessed for all those sources keeping records. These costs are summarized in the table presented below:

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
PID	\$3,300	0	0	\$95	12	\$1,140
HHD	\$250	2,330	\$582,500	\$14	20,000	\$280,000
Initial notification & compliance report	-	-	-	\$6.37	2,330	\$14,842
Report exceed consumption cutoff	-	-	-	\$6	117	\$702
Photocopying	-	-	-	\$2.40	28,012	\$67,229
Total			\$583,000			\$364,000

Note: Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are \$583,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$364,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$947,000.

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 \$250,000.

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 – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (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 28,012 existing respondents will be subject to these standards. It is estimated that an additional 2,330 area sources per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 28,012 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are No Longer Subject ²	(E) Number of Respondents (E=A+B+C-D)
1	2,330	28,012	0	2,330	28,012
2	2,330	28,012	0	2,330	28,012
3	2,330	28,012	0	2,330	28,012
Average					28,012

¹ New respondent include sources with constructed, reconstructed and modified affected facilities. In this standard existing respondents submit initial notifications.

² We assume that the overall number of facilities will remain constant due to retirement of old existing 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 28,012.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of	(C) Number of	(D) Number of Existing Respondents That	(E) Total Annual Responses E=(BxC)+D

Total Annual Responses				
	Respondents	Responses	Keep Records But Do Not Submit Reports	
Write Initial Notification Report	2,330	1	25,682	28,012
Compliance Method Report	1,631	1	N/A	1,631
Solvent Consumption Report	699	1	N/A	699
Report Exceed Consumption Cutoff	117	1	N/A	117
			Total	30,459

The number of Total Annual Responses is 30,459.

The total annual labor costs are \$166,000,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (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 1,590,000 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal).

In general, 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. However, the burden for each worker category may vary depending on the task. See Table 1 below for additional details.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 52 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$947,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 5,490 labor hours at a cost of \$250,000. See below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (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

There is an adjustment increase in respondent labor hours in this ICR from the most recently approved ICR. This is due to assuming all existing sources will have to re-familiarize with the regulatory requirements each year. Additionally, there is an increase in the total capital and O&M cost due to the rounding of all calculated values to three significant digits.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 52 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2012-0659. 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-2012-0659 and OMB Control Number 2060-0234 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal)

Burden Item	A	B	C	D	E	F	G	H
	Hours per occurrence	Occurrences per respondent per year	Hours per respondent per year	Respondents per year ^a	Technical hours per year	Management hours per year	Clerical hours per year	Total cost per year (\$) ^b
			(AxB)		(CxD)*	(Ex0.05)*	(Ex0.10)*	
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarization with the regulatory requirements ^c	1	1	1	28,012	0	28,012	0	\$3,639,599.16
B. Required activities	N/A							
C. Create Information	N/A							
D. Gather existing information								
Initial report information	2	1	2	2,330	4,660	233	466	\$538,908.03
Solvent consumption	1	1	1	2,330	2,330	116.5	233	\$269,454.02
Compliance method report ^d	1	1	1	1,631	1,631	81.55	163.1	\$188,617.81
E. Write Report								
Initial notification report	1	1	1	2,330	2,330	116.5	233	\$269,454.02
Compliance method report ^{c, d}	1	1	1	1,631	0	1,631	0	\$211,915.83
Solvent consumption report ^{c, e}	0.25	1	0.25	699	0	174.75	0	\$22,705.27
Report-exceed consumption cutoff ^{c, f}	1	1	1	117	0	117	0	\$15,201.81
Reporting Subtotal						42,528		\$5,155,855.94
4. Recordkeeping Requirements								
A. Familiarization with the regulatory requirements	See 3A							
B. Plan activities ^g	1	1	1	2,330	2,330	0	0	\$242,250.10
C. Implement activities								
Above consumption cutoff: Weekly	0.75	52	39	19,600	764,400	0	0	\$79,474,668.00

Burden Item	A	B	C	D	E	F	G	H
	Hours per occurrence	Occurrences per respondent per year	Hours per respondent per year	Respondents per year ^a	Technical hours per year	Management hours per year	Clerical hours per year	Total cost per year (\$) ^b
			(AxB)		(CxD)*	(Ex0.05)*	(Ex0.10)*	
LDAR ^{g, h, i}								
Below consumption cutoff: Bi-weekly LDAR ^{g, i, j}	0.75	26	19.5	8,400	163,800	0	0	\$17,030,286.00
Major: Monthly enhanced LDAR ^{k, l}	1	48	48	12	576	28.8	57.6	\$66,611.81
Major: Weekly Carbon adsorber monitoring ^{l, m}	0.25	208	52	12	624	31.2	62.4	\$72,162.79
Area: Monthly enhanced LDAR ^{n, o}	0.75	12	9	20,000	180,000	9,000	18,000	\$20,816,190.00
D. Develop record system								
Solvent consumption ^g	1	1	1	2,330	2,330	0	0	\$242,250.10
Enhanced LDAR ^g	1	1	1	2,330	2,330	0	0	\$242,250.10
Monitoring records ^{d, g}	1	1	1	1,631	1631	0	0	\$169,575.07
Carbon adsorber monitoring records ^p	1	1	1	0	0	0	0	\$0
E. Time to enter information								
Monthly records of solvent consumption ^{q, r, s}	0.25	12	3	28,012	84,036	9	0	\$8,738,392.29
Above consumption cutoff: Records of weekly inspections ^{h, i, s}	0.25	52	13	19,600	254,800	39	0	\$26,496,623.27
Below consumption cutoff: Records of bi-weekly inspections ^{g, i, j}	0.25	26	6.5	8,400	54,600	0	0	\$5,676,762.00
Major: Enhanced LDAR	See 4C							
Major: Carbon adsorber monitoring	See 4C							
Area: Enhanced LDAR	See 4C							
F. Time to Train personnel								
Leak detection ^{t, u}	1	2	2	2,330	4,660	4,660	0	\$1,089,974.00
G. Time for audits	N/A							
Recordkeeping Subtotal						1,548,005		\$160,357,995.53

Burden Item	A	B	C	D	E	F	G	H
	Hours per occurrence	Occurrences per respondent per year	Hours per respondent per year	Respondents per year ^a	Technical hours per year	Management hours per year	Clerical hours per year	Total cost per year (\$) ^b
			(AxB)		(CxD)*	(Ex0.05)*	(Ex0.10)*	
TOTAL ANNUAL BURDEN AND COSTS (rounded): ^v						1,590,000		\$166,000,000
Capital and O&M Cost (see Section 6(b)(iii)): ^v								947,000
TOTAL COST: ^v								167,000,000

*Unless otherwise specified; see assumptions below.

Assumptions:

^a We have assumed that there are 28,000 existing area sources and that 2,330 sources will leave the industry and will be replaced by 2,330 new area sources over the next three years. We have also assumed that there are 12 existing major sources and that no additional major sources will be subject to the NESHAP over the three-year period of this ICR.

^b This ICR uses the following labor rates: Technical \$103.97 (\$49.51 + 110%); Managerial \$129.93 (\$61.87+ 110%); and 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. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

^c This task requires management hours only.

^d This is based on the estimate that 1,631 (70 percent) of the 2,330 new facilities will be above the cutoff and thus required to perform this task.

^e This is based on the estimate that 699 (30 percent) of the 2,330 new facilities will be below the cutoff and thus required to perform this task.

^f We estimate that 5 percent of new facilities each year will exceed the cutoff, thus requiring submission of the exceed-consumption cutoff report.

^g This task requires only technical employee hours.

^h Occurrences are based on weekly inspection, assuming 52 weeks per year.

ⁱ We have assumed that of 28,000 perchloroethylene dry cleaners 19,600 (70 percent) will be above the per consumption cutoff, which will require that the cleaner conduct weekly leak detection and repair. The remaining 8,400 perchloroethylene dry cleaners will be below the consumption cutoff and are only required to conduct bi-weekly leak detection and repair.

^j We have assumed that facilities below cutoff performs leak detection and repairs on a bi-weekly basis.

^k Major sources contain an average of four machines. Task requires 1 hour times 4 machines/major source.

^l Approximately 12 existing major sources are subject to the NESHAP.

^m Major sources contain an average of four machines. Task requires 0.25 hour times 4 machines/major source.

ⁿ Area sources contain an average of one machine. Task requires 0.75 hour times 1 machine/area source.

^o Approximately 8,000 existing area sources are located in states that already require enhanced monitoring; therefore, 20,000 existing area sources are subject to the NESHAP's enhanced LDAR program.

^p No new major sources are expected for the three-year period of this ICR; therefore, no burden is associated with the development of carbon adsorber monitoring record systems.

^q Occurrences are based on twelve months rolling average of PCE consumption, determined once per month.

^r This is based on 28,000 area sources and 12 major sources performing this task every year.

^s This task is performed primarily by technical staff. Management hours are only for a limited number of major sources, and we assume only three major sources will require managerial review.

^t Estimate includes hours for training one owner/operator and one employee.

^u This task requires an equal amount of management and technical employee hours.

^v Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal)

Burden Item	A	B	C	F	G	H
	EPA technical hours per occurrence	Occurrences per year ^a	Technical hours per year (AxB)	Management hours per year (Cx0.05)	Clerical hours per year (Cx0.10)	Total cost per year (\$) ^b
1. Report review						
A. Initial notification report	1	2,330	2,330	116.5	233	121,952.20
B. Solvent consumption report ^c	1	699	699	34.95	69.9	36,585.66
C. Report-exceed consumption cutoff ^d	1	117	117	5.85	11.7	6,123.78
D. Compliance method report ^e	1	1,631	1,631	81.55	163.1	85,366.54
Total Labor Burden and Cost ^f				5,490		250,000

Assumptions:

^a We have assumed that there are 28,000 existing area sources and that 2,330 sources will leave the industry and will be replaced by 2,330 new area sources over the next three years. We have also assumed that there are 12 existing major sources and that no additional major sources will be subject to the NESHAP over the three-year period of this ICR.

^b This cost is based on the average hourly labor rate as follows: Technical \$46.67 (GS-12, Step 1, \$29.17 + 60%); Managerial \$62.90 (GS-13, Step 5, \$39.31 + 60%); and Clerical \$25.25 (GS-6, Step 3, \$15.78 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the 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.

^c We assume that 30 percent of new sources will consume less than 140 gallons of PCE per year.

^d We assume that five percent of new sources will have to report-exceed consumption cutoff.

^e We assume that 70 percent of new area sources will consume between 140 to 200 gallons of PCE per year.

^f Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.