Burden Item	A Hours per occurrence	B Occurrences per respondent per year	C Hours per respondent per year (AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting Requirements			
A. Familiarization with the regulatory requirements[c]	1	1	1
B. Required activities	N/A		
C. Create Information	N/A		
D. Gather existing information			
Initial report information	2	1	2
Solvent consumption	1	1	1
Compliance method report[d]	1	1	1
E. Write Report			
Initial notification report	1	1	1
Compliance method report[c, d]	1	1	1
Solvent consumption report[c, e]	0.25	1	0.25
Report-exceed consumption cutoff[c, f]	1	1	1
Reporting Subtotal			
4. Recordkeeping Requirements			
A. Familiarization with the regulatory requirements	See 3A		
B. Plan activities[g]	1	1	1
C. Implement activities			
Above consumption cutoff: Weekly LDAR[g]	0.75	52	39
Below consumption cutoff: Bi-weekly LDA	0.75	26	19.5
Major: Monthly enhanced LDAR[k, l]	1	48	48
Major: Weekly Carbon adsorber monitoring	0.25	208	52
Area: Monthly enhanced LDAR[n, o]	0.75	12	9
D. Develop record system			
Solvent consumption[g]	1	1	1
Enhanced LDAR[g]	1	1	1
Monitoring records[d, g]	1	1	1
Carbon adsorber monitoring records[p]	1	1	1
E. Time to enter information			
Monthly records of solvent consumption[q, r, s]	0.25	12	3
Above consumption cutoff: Records of weekly inspections[h, i, s]	0.25	52	13
Below consumption cutoff: Records of bi-weekly inspections[g, i, j]	0.25	26	6.5
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
G. Time for audits	N/A		

Recordkeeping Subtotal			
TOTAL ANNUAL BURDEN AND COSTS (rounded): [v]			
Capital and O&M Cost (see Section 6(b)(iii)): [v]			
TOTAL COST: [v]			

[a] We have assumed that there are 28,000 existing area sources and that 2,330 sources will leave the industry and will be

[b] This ICR uses the following labor rates: Technical $103.97 ($49.51 + 110%); Managerial $129.93 ($61.87+ 110%); a

[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 requ

[e] This is based on the estimate that 699 (30 percent) of the 2,330 new facilities will be below the cutoff and thus require

[f] We estimate that 5 percent of new facilities each year will exceed the cutoff, thus requiring submission of the exceed-

[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 consumptio

[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, 2

[p] No new major sources are expected for the three-year period of this ICR; therefore, no burden is associated with the d

[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 source

[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.

D	E	F	G	H
Respondents per year[a]	**Technical hours per year**	**Management hours per year**	**Clerical hours per year**	**Total cost per year ($)[b]**
	(CxD)	**(Ex0.05)**	**(Ex0.10)**	
28,012	0	28,012	0	$3,639,599.16
2,330	4,660	233	466	$538,908.03
2,330	2,330	116.5	233	$269,454.02
1,631	1,631	81.55	163.1	$188,617.81
2,330	2,330	116.5	233	$269,454.02
1,631	0	1,631	0	$211,915.83
699	0	174.75	0	$22,705.27
117	0	117	0	$15,201.81
	42,528			$5,155,855.94
2,330	2,330	0	0	$242,250.10
19,600	764,400	0	0	$79,474,668.00
8,400	163,800	0	0	$17,030,286.00
12	576	28.8	57.6	$66,611.81
12	624	31.2	62.4	$72,162.79
20,000	180,000	9,000	18,000	$20,816,190.00
2,330	2,330	0	0	$242,250.10
2,330	2,330	0	0	$242,250.10
1,631	1631	0	0	$169,575.07
0	0	0	0	$0
28,012	84,036	9	0	$8,738,392.29
19,600	254,800	39	0	$26,496,623.27
8,400	54,600	0	0	$5,676,762.00
2,330	4,660	4,660	0	$1,089,974.00

$103.97

$129.93

$51.79

	1,548,005			$160,357,995.53
	1,590,000			$166,000,000
				947,000
				167,000,000

52 hrs/resp (rounded)

e replaced by 2,330 new area sources over the next three years. We have also assumed that there are 12 existing major source
ınd Clerical $51.79 ($24.66 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistic

ired to perform this task.
ed to perform this task.
consumption cutoff report.

ɔn cutoff, which will require that the cleaner conduct weekly leak detection and repair. The remaining 8,400 perchloroethyle

!0,000 existing area sources are subject to the NESHAP's enhanced LDAR program.
levelopment of carbon adsorber monitoring record systems.

s, and we assume only three major sources will require managerial review.

es and that no additional major sources will be subject to the NESHAP over the three-year period of this ICR.

s, June 2014, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensa

ne dry cleaners will be below the consumption cutoff and are only required to conduct bi-weekly leak detection and repair.

tion." 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 Tech

nical hours.

Burden Item	A EPA technical hrs per occurrence	B Occurrences per year[a]
1. Report review		
A. Initital notification report	1	2,330
B. Solvent consumption report[c]	1	699
C. Report-exceed consumption cutoff[d]	1	117
D. Compliance method report[e]	1	1,631
Total Labor Burden and Cost [f]		

Assumptions:

[a] We have assumed that there are 28,000 existing area sources and that 2,330 sources will leave the industr

[b] This cost is based on the average hourly labor rate as follows: Technical $46.67 (GS-12, Step 1, $29.17 +

[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 yea

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

C	F	G	H
Technical hrs per year (AxB)	**Management hrs per year (Cx0.05)**	**Clerical hrs per year (Cx0.10)**	**Total cost per year ($)[b]**
2,330	116.5	233	121,952.20
699	34.95	69.9	36,585.66
117	5.85	11.7	6,123.78
1,631	81.55	163.1	85,366.54
5,490			**250,000**

y and will be replaced by 2,330 new area sources over the next three years. We have also assumed that there are 12
60%); Managerial $62.90 (GS-13, Step 5, $39.31 + 60%); and Clerical $25.25 (GS-6, Step 3, $15.78 + 60%). This

r.

TECH	$46.67
MNG	$62.90
CLER	$25.25

existing major sources and that no additional major sources will be subject to the NESHAP over the three-year peric

s ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technica

ɔd of this ICR.

l hours. These rates are from the OPM, 2015 General Schedule, which excludes locality rates of pay. The rates ha

ıve been increased by 60 percent to account for the benefit packages available to government employees.