

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

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

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (Renewal), EPA ICR Number 1176.13, OMB Control Number 2060-0161.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for New Residential Wood Heaters (40 CFR 60, Subpart AAA) were proposed on February 18, 1987, promulgated on February 26, 1988, and amended last on March 6, 2015. These regulations apply to existing facilities and new facilities that contain wood heaters. 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. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 60, Subpart AAA.

One feature of the NSPS requires emphasis at the outset, which is that 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.

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.

There are approximately 33 manufacturers, with 85 model lines, and 12 laboratories (inclusive of both test labs and third-party certifiers) that would be subject to subpart AAA over the next three years (a total of 45 entities).¹ Under subpart AAA, wood heater manufacturers,

¹ There are 8 EPA-approved test laboratories and 8 EPA-approved third-party certifiers. There is a total of 12 EPA-approved test labs and third-party certifiers as there is some overlap with some labs being both EPA-approved as well as third-party certifiers.

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. None of the 45 entities are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

The ‘burden’ to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (Renewal). The Federal Government’s ‘burden’ is attributed entirely to work performed by either Federal employees or government contractors and refers below to Table 2: Average Annual EPA Burden and Cost – NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (Renewal).

Over the next three years, approximately 45 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. The estimate of the number of respondents is based on recent EPA certification data that reflects fewer manufacturers certifying model lines in advance of Subpart AAA’s Step 2 PM standards, which go into effect May 15, 2020, as well as to industry consultations that indicate a decline in the number of manufacturers based on ongoing industry consolidation and decreasing market size. There is no anticipated growth in the number of EPA-approved test labs, third-party certifiers, or manufacturers. The hearth industry is a mature business and, as such, the likelihood of an increase in the number of wood and pellet stove manufacturers is small. Additionally, the estimate has been updated to reflect new EPA-approved test laboratories and third-party certifiers.

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 eight years.

In the Administrator's judgment, PM emissions from wood heater manufacturing 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 63, Subpart AAA.

2(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 merits sufficient quality to be used as evidence in court.

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

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

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* (82 FR 29552) on June 29, 2017. No comments were received on the burden published in the *Federal Register* for this renewal.

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 these standards, 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. Approximately 45 respondents will be subject to these same standards over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as it was being developed and these same standards has been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Hearth, Patio, Barbeque Association (HPBA), at (916) 536-2390, and the Myren Consulting, Incorporated, at (509) 684-1154. HPBA indicated that the number of manufacturers and model lines have decreased following the 2015 final rule, as manufacturers decline to seek renewal of certifications for "deemed certified" model lines that they are no longer producing. HPBA also pointed to data indicating that fewer manufacturers are seeking certifications prior to the effective date of the 2020 standards, based on ongoing industry consolidation, regulatory impacts, and decreasing market size. HPBA did not expect growth in the biomass hearth industry or in the number of EPA-approved test labs, third-party certifiers, or manufacturers. HPBA confirmed that there are currently 8 test laboratories and 8 third-party certifiers.

3(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.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of these 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 these standards. The basis for the five-year record retention is because the required emission standard model certifications are valid for five 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).

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 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 manufacturers of new residential wood heaters. The United States Standard Industrial Classification (SIC) codes, and corresponding North American Industry Classification System (NAICS) codes for the respondents affected by these standards are provided in the following table:

40 CFR Part 60, Subpart AAA	SIC Codes	NAICS Codes
Heating Equipment (Except Warm Air Furnaces Manufacturing)	3433	333414
Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment Manufacturing	3585	333415
Testing Laboratories (except Medical, Veterinary)	8734	541380

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA).

A source must make the following reports:

Notifications	
Notification from the manufacturer of certification testing at least 30 days prior to test	§ 60.534(g)
Reports	
<i>Manufacturers</i>	
Application for certification of compliance, including certification test results	§ 60.533(b), § 60.533(f)(1)
Request for waiver from submitting certification test results	§ 60.533(g)
Submission of performance test data	§ 60.534(a)(1), § 60.537(f)
Certification of renewal and request for exemption from certification testing.	§ 60.533(i)*
Request for waiver of the requirement that a model line be recertified when changes exceed specified tolerances	§ 60.533(k)
Submission of corrective actions from review of third-party QA report	§ 60.533(m)
EPA compliance audit test results	§ 60.533(n)
Biennial certification (i.e. statement that model line is unchanged and submittal of sales data by state)	§ 60.537(d)
<i>Test Laboratories</i>	
Application for EPA approval as a test lab	§ 60.535(a)(1)
Proficiency test and all test documentation	§ 60.535(a)(2)(i), § 60.537(b)
Submission of preliminary test reports	§ 60.533(n)(3), § 60.535(a)(2)
<i>Third-party verifiers</i>	
Report of QA program audits	§ 60.533(m); § 60.535(e)(2)
Application for EPA approval as a certifier	§ 60.535(e)
Certification tests, inspection reports, and accreditation credentials	§ 60.537(b)

* 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.

A source must keep the following records:

Recordkeeping	
<i>Manufacturers</i>	
Maintain records of all certification tests and associated data	§ 60.537(a)(2)
Recordkeeping of all inspections, emissions tests reports, data sheets, notes, calculations, and results, and corrective actions measures taken pursuant to quality assurance program	§ 60.533(m) & § 60.537(a)(3) § 60.537(a)(4)
Retain sealed stoves	§ 60.537(c)
<i>Test Laboratories</i>	
Records of all documentation pertaining to each certification test, quality assurance program inspect, and audit tests	§ 60.537(b)
Laboratory proficiency tests	§ 60.535(b)
<i>Third-party certifiers</i>	
Records of all documentation pertaining to each certification test, quality assurance program inspect, and audit tests	§ 60.537(b)

Electronic Reporting

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.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Manufacturers must obtain a certificate of compliance for each model line of wood heater to be manufactured or sold, provide notification for testing, and conduct quality assurance activities.
Test laboratories must obtain EPA approval as a test lab and participate in a biennial proficiency testing program, and submit results of all proficiency tests to EPA.
Third party certifiers must obtain EPA approval as a certifier and submit reports of QA inspection audits, certification tests, QA inspection reports, and accreditation credentials to EPA.

Respondent Activities
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:

Agency Activities
Review applications for certification and renewal of certifications, audit reports, required to be submitted.
Provide notice to manufacturers of EPA compliance audit tests.
Provide notice of revocation or suspension of certifications.
Review test laboratory applications and provide approvals or notice of intent to revoke laboratory accreditation.
Review third-party certifier applications and provide approvals, or notice of intent to revoke certifier approvals.
Evaluate laboratory proficiency tests.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

5(b) Collection Methodology and Management

All reports are sent directly to the Agency. Data obtained from reports submitted and records maintained by the respondents will be used in compliance and enforcement programs. Information contained in the reports is systematically filed at EPA headquarters. 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: <https://www.epa.gov/compliance/wood-heater-compliance-monitoring-program>.

The records required by this regulation must be retained by manufacturer for five years.

5(c) Small Entity Flexibility

Most of the manufacturers and laboratories 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 provided 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 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 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 QA program requirements also align with existing safety QA procedures, thus eliminating duplicative procedures.

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 New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (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 record-keeping and reporting requirements is estimated to be 4,320 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulations, 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	\$149.35 (\$71.12 + 110%)
Technical	\$112.98 (\$53.80 + 110%)
Clerical	\$54.81 (\$26.10 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, “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(s) are both labor costs, which are addressed elsewhere in this ICR, and the costs associated with testing, audits, labeling, and development of manuals. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. Due to the nature of these standards, there are no operation and maintenance (O&M) costs.

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

(A) Data Collection Device	(B) Capital/Start-Up for One Respondent/Unit	(C) Number of New Respondents/Models/Unit s	(D) Total Capital/Start-Up Cost (B X C)
Certification Test ^a	\$16,750 per respondent	85 models	\$1,423,750

Cost of Permanent Label ^b	\$400 per model	85 models	\$34,000
QA Performance Test ^c	\$16,750 per respondent	330 respondents	\$552,750
EPA Compliance Audit Test ^d	\$17,815 per respondent	1 respondent	\$17,815
Owners Manual ^e	\$2,250 per model	85 models	\$191,250
ISO Accreditation-Test Laboratories ^f	\$75,000 per respondent	0 respondents	\$0
ISO Accreditation-Third-Party Certifiers ^g	\$75,000 per respondent	0 respondents	\$0
Totals^h			\$2,220,000
Annual average			\$740,000

^a Models certified by testing per manufacturer: 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 85 models during the three-year ICR period in order to replace old models that will not meet the Step 2 emission standards. ^b Total costs of permanent labels are estimated to be \$400 per model. We estimate that there will be 85 certified models produced by all manufacturers (33 manufacturers) during the period covered by this ICR that would be subject to permanent labeling requirements.

^c Assumes that there will be 33 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. We assume that each of the 33 manufacturers will be required to test one model under their QA program between 2019 and 2020.

^d Assumes that there will be EPA compliance audit testing for one model affecting one manufacturer during the period covered by this ICR. 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)).

^e Assumes an average fixed cost of \$2,250 for owner's manual (revised or new, possibly bilingual) per model (85 models) that will need to be developed/revised to include subpart AAA requirements.

^f Assumes all test labs are ISO accredited (that are going to choose be accredited), a total of 8 labs.

^g Assumes all third-party certifiers are ISO accredited (that are going to choose to be accredited).

^h 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 \$740,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$0. This is the total of column G.

The average annual cost for capital/startup and/or operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$740,000. These are recordkeeping 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 such activities 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 \$24,100.

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

Managerial	\$64.80 (GS-13, Step 5, \$40.50 + 60%)
Technical	\$48.08 (GS-12, Step 1, \$30.05 + 60%)
Clerical	\$26.02 (GS-6, Step 3, \$16.26 + 60%)

These rates are from the Office of Personnel Management (OPM), 2017 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (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 45 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 45 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	(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	0	45	0	0	45
2	0	45	0	0	45
3	0	45	0	0	45
Average	0	45	0	0	45

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 45.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(B \times C) + D$
Certification test notification ^a	33	0.9	0	29.7
Application for certification ^a	33	0.9	0	29.7
Biennial reporting ^a	33	1.7	0	56.1
EPA compliance audit testing	1	0.3	0	0.3
QA performance test results	33	0.3	0	9.9
QA annual audit reports ^b	8	10.6	0	84.8
Review annual QA audit report	33	1	0	33
Application for test lab approval	0	0	0	0
Biennial proficiency testing and report development	8	0.7	0	5.6
Application for approval as a third-party certifier	0	0	0	0
			Total ^c	249

^aAssume 33 manufacturers provide responses for 85 model lines for each item over a three year period (responses are calculated on an annual basis, so the number of responses is divided by 3). For a single report, 85 models/33 manufacturers/3 years. For a biennial report, 85/33*2(reports)/3(years).

^bFor QA audits, the respondents are third-party certifiers who are auditing model lines. Assume 3 audits, 85 model lines * 3 audits/8 certifiers/3 years = 10.6 responses per year.

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

The number of Total Annual Responses is 249.

The total annual labor costs are \$473,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

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

(i) Respondent Tally

The total annual labor hours are 4,320 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (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 17 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$740,000. 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 514 labor hours at a cost of \$24,100; see below in Table 2: Average Annual EPA Burden and Cost – NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (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 increase in the total estimated respondent annual burden as currently identified in the OMB Inventory of Approved Burdens. These changes are not due to any program changes. The increase in burden from the most-recently approved ICR is due to an increase in the number of test laboratories and third-party certifiers subject to these standards and is not due to any program changes. The number of sources has been adjusted in this ICR to reflect more current information obtained regarding the number of manufacturers certifying model lines in advance of Subpart AAA's Step 2 PM standards, which go into effect in 2020, as well as for data that indicates a decline in the number of manufacturers based on ongoing industry consolidation and decreasing market size, and to reflect additional entities obtaining EPA approval as test laboratories or third-party certifiers. There is also an increase in respondent burden costs from the most-recently approved ICR due to the use of updated labor rates. This ICR references updated labor rates from the Bureau of Labor Statistics to calculate respondent burden costs.

There is a decrease in capital/startup costs as compared to the previous ICR. This change is due to a decrease in the number of manufacturers, and because initial compliance requirements for test laboratories and third-party certifiers, within these standards, occurred during the period of the previous ICR. The overall result is a decrease in costs to the industry.

The supporting statement for this information collection was revised to clarify and consolidate the information items requested (including notification, reporting, and recordkeeping requirements) and respondent activities in section 4(b), as well as for agency activities in section 5(a). These requirements were previously listed in Appendix A of the prior ICR and have been relocated in sections 4(b) and 5(a) to help more easily identify the relevant data items and activities that contribute to burden. There are no changes to these requirements from the prior ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 17 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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 neither conduct nor 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-2013-0331. 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-2013-0331 and OMB Control Number 2060-0161 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 New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (Renewal)

a. Already has ISO accreditation	20.00	0.0	0.0	8	0.0	0.0	0.0	\$0
b. Needs to obtain ISO accreditation	80.00	0.0	0.0	0	0.0	0.0	0.0	\$0
<i>Subtotal for Reporting Requirements</i>						3,511		\$384,502
Recordkeeping Requirements								
<i>Manufacturers</i>								
1. Test documentation ^m	1.00	0.9	0.9	33	28.3	1.4	2.8	\$3,567.97
2. QA parameter inspections ⁿ	2.00	4.0	8.0	33	264.0	13.2	26.4	\$33,245.12
3. Retained (sealed) stoves ^o	1.00	0.9	0.9	33	28.3	1.4	2.8	\$3,567.97
Test Laboratories								
1. Certification test, proficiency test, and audit test results ^p	2.00	12.0	24.0	8	192.0	9.6	19.2	\$24,178.27
<i>Third-Party Certifier</i>								
1. Certification test, QA program inspection and audit tests ^q	2.00	12.0	24.0	8	192.0	9.6	19.2	\$24,178.27
<i>Subtotal for Recordkeeping Requirements</i>						810		\$88,738
TOTAL BURDEN AND COSTS (rounded)^r						4,320		\$473,000
TOTAL CAPITAL AND O&M COST (rounded)^r								\$740,000
GRAND TOTAL (rounded)^r								\$1,210,000

^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 \$112.98, management at \$149.35 and clerical at \$54.81.

^c Assumes that 85 models will require new certification to meet 2020 emission standards or will recertify their current compliance certifications over the period of the ICR.

^d Assumes that 85 models will require new certification due to meet 2020 emission standards or will recertify or renew (where a test waiver is obtained) compliant certifications over the period of the ICR.

^e For the three-year period of this ICR, we assume 2 biennial reports per manufacturer for each of their models 85 models/33 manufacturers x 2 reports = 5.2 reports), or 1.7 responses per year at 2 hrs per report.

^f Assumes that one of the 33 manufacturers will be required to undergo an EPA compliance audit test for one of their models during the three-year ICR period.

^g Assumes that there will be one QA audit performance test per manufacturer (33 manufacturers) under the QA program during the period covered by this ICR. We assume that each of the 33 manufacturers will be required to test one model and report results to the EPA under their QA program.

^h Assumes there will be three QA audits by third-party certifiers for each of the 33 manufacturers over the three-year ICR period 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).

ⁱ 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 0 occurrences for the three-year ICR period.

^k Assumes that each of the 8 test laboratories will conduct two biennial proficiency tests and prepare two reports during the three-year ICR period.

^l Assumes 0 occurrences for the three-year ICR period.

^m Assumes that manufacturers will spend one hour per certification test (for 85 models) to keep the required records.

ⁿ Parameter inspections are part of the existing safety inspection program. We have assumed each of the 33 wood stove manufacturers with certified models will spend an additional 2 hours per quarter to document results.

^o Assumes that one stove is sealed and retained for each certification test (for 85 models) required of the 33 manufacturers over the three-year ICR period.

^p We expect the required recordkeeping to be highly automated and have assumed that test laboratories will spend 2 hours per month to maintain records.

^q We expect the required recordkeeping to be highly automated and have assumed that third-party certifiers will spend 2 hours per month to maintain records.

^r Totals have been rounded to three significant values. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NSPS for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) (Renewal)

Burden Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per year	(C) EPA person- hours per year (C=AxB)	(D) Respondents per year	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours ^a per year(F=Ex0.05)	(G) Clerical person- hours ^a per year (G=Ex0.1)	(H) Total Cost per year,\$ ^b
1. Certification test notification ^c	0.5	0.9	0.4	33	14.2	0.7	1.4	\$763.90
2. Certification test ^d	20.0	0.9	17.2	4	73.0	3.6	7.3	\$3,935.22
3. Application for certification of model line ^e	8.0	0.9	6.9	33	226.7	11.3	22.7	\$12,222.32
4. Biennial reporting for certified models ^f	1.0	0.9	0.9	33	28.3	1.4	2.8	\$1,527.79
5. Review and approval of test lab credentials ^g	4.0	1.0	4.0	0	0.0	0.0	0.0	\$0
6. Review test lab biennial proficiency test reports ^h	10.0	0.7	6.7	8	53.3	2.7	5.3	\$2,875.84
7. Review QA performance test results ⁱ	2.0	0.3	0.7	33	22.0	1.1	2.2	\$1,186.28
8. Review QA audit report ^j	2.0	1.0	2.0	8	16.0	0.8	1.6	\$862.75
9. EPA Compliance Audit ^k	40.0	0.3	13.3	1	13.3	0.7	1.3	\$718.96
10. Review and approval of third-party certifier credentials ^l	8.0	1.0	8.0	0	0.0	0.0	0.0	\$0
TOTAL (rounded)^m					514			\$24,100

^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 \$48.08, management at \$64.80, and clerical at \$26.02.

^c Models certified by testing per manufacturer: Assumes that 85 models will require new certification to meet 2020 emission standards or will recertify their current compliance certifications between the 2018-2020 time period, and that roughly 1/3 of models are recertified each year over the three-year period.

^d Assumes that EPA will observe 5 percent of certification tests (85 X .05) conducted during the ICR reporting period, which is rounded to 4 tests per year.

^e Assumes that EPA will review and approve certification applications for 85 models which will require new certification due to meet 2020 emission standards or will recertify or renew (where a test waiver is obtained) compliant certifications.

^f Assumes that the EPA will receive one biennial report for 85 models (33 manufacturers) over the 3-year ICR period.

^g Assumes 0 occurrences for the three-year period.

^h Assumes that each of the 8 test laboratories will conduct two biennial proficiency tests and prepare two reports during the three-year ICR period.

ⁱ Assumes that there will be 33 QA emissions test results submitted under the QA program and reviewed by the EPA during the period covered by this ICR. We assume that each of the 33 manufacturers will be required to test one model and report results to the EPA under their QA program between 2018 and 2020.

^j Assumes there will be three QA audits by the third-party certifiers reviewed by the EPA for each of the 33 manufacturers over the three-year ICR period.

^k Assumes that one model line for one of the 33 manufacturers will be audited by the EPA during the ICR three-year period.

^l Assumes 0 occurrences for the three-year ICR period.

^m Totals have been rounded to three significant values. Figures may not add exactly due to rounding.