

**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 1415.12, OMB Control Number 2060-0234.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) were proposed on December 9, 1991, promulgated on September 22, 1993, and most recently-amended on July 11, 2008. These regulations apply to existing and new dry-cleaning facilities that use perchloroethylene (PCE). New facilities include those that commenced either 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 notifications, 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. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

The “Affected Public” are owners or operators of dry-cleaning facilities that use perchloroethylene (PCE). The ‘burden’ to the Affected Public may be found below in Table 1a: Annual Respondent Burden and Cost for Private Facilities - NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal). The ‘burden’ to the Federal Government is attributed entirely to work performed by either Federal employees or designated contractors, and may be found below in: 1) Tables 1b: Annual Respondent Burden and Cost for Federal Facilities - NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal); and 2) Table 2: Average Annual EPA Burden and Cost - NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal). A separate table breaks out the burden by affected sector and may be found below in Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector - NESHAP for Perchloroethylene

## Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal).

Over the next three years, approximately 28,020 respondents per year will be subject to these standards, of which 20 are major sources and the remainder (28,000) are area sources. We assume that all existing and new area source dry-cleaning facilities in the United States are privately-owned and operated by the dry-cleaning industry. 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. We estimate that 2,330 additional area sources per year will become subject to these regulations in the next three years, but that the overall number of facilities will remain constant due to the retirement of old existing facilities. Thirteen of the 20 major source dry cleaning facilities in the United States are privately-owned and operated by the dry-cleaning industry. The other 7 major source dry-cleaning facilities are owned by the Federal government. No new major sources are expected over the next three years. None of the facilities are owned by either state, local or tribal agencies. We assume that they will all respond to EPA regulations

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

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.

The control of emissions of PCE from dry cleaning facilities requires not only the installation of properly-designed equipment, but also the operation and maintenance of that equipment. Emissions of perchloroethylene from dry cleaning facilities are the result of operating the dry-cleaning units. These same standards rely on the reduction of PCE emissions by either refrigerated condensers or carbon absorbers and require pollution prevention.

The notifications required in these standards are used to inform either 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 that these standards are being met.

The required initial and occasional 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* (83 FR 24785) on May 30, 2018. 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 28,020 respondents will be subject to these same standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the 'burden' associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Halogenated Solvents Industry Alliance, Inc., at (703) 875-0683, and the Dry Cleaning 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 for 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 these 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 these 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 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 perchloroethylene dry-cleaning facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by these standards and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below:

| <b>40 CFR Part 63, Subpart M</b>                         | <b>SIC Codes</b>          | <b>NAICS Codes</b> |
|--|---------------------------|--------------------|
| Coin-Operated Laundries and Drycleaners                  | 7215                      | 812310             |
| Dry-cleaning and Laundry Services (except Coin-Operated) | 7211, 7212,<br>7216, 7219 | 812320             |
| Industrial Launderers                                    | 7218                      | 812332             |

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

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

In this ICR, all the data that are 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:

| <b>Notifications</b>                              |                        |
|---|------------------------|
| 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:

| <b>Recordkeeping</b>   |              |
|--|--------------|
| Monthly enhanced LDAR  | §63.322(o)   |
| 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**

| <b>Respondent Activities</b>  |
|---|
| Familiarization with the regulatory requirements.   |
| 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 |

| <b>Respondent Activities</b>  |
|---|
| systems for collecting, validating, and verifying information.  |
| Develop, acquire, install, and utilize technology and systems for processing and maintaining information. |
| Develop, acquire, install, and utilize technology and systems for disclosing and providing information.   |
| Train personnel to be able to respond to a collection of information.                                     |
| Transmit, or otherwise disclose the information.  |

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

### **5(a) Agency Activities**

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

| <b>Agency Activities</b>  |
|---|
| Review notifications and reports, including 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. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The initial and occasional 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. The 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 at the end of this document in Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal); and in Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal).

## **6. Estimating the Burden and Cost of the Collection**

Tables 1a and 1b document 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 neither conduct nor 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

Tables 1a and 1b below). These hours are based on Agency studies and background documents from the development of the regulations, 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 for workers at private sector dry-cleaning facilities:

|            |                           |
|------------|---------------------------|
| Managerial | \$147.40 (\$70.19+ 110%)  |
| Technical  | \$117.92 (\$56.15 + 110%) |
| Clerical   | \$57.02 (\$27.15 + 110%)  |

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, “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 uses the following labor rates for Federal government employees working at dry-cleaning facilities:

|            |  |
|------------|--|
| Managerial | \$65.71 (GS-13, Step 5, \$41.07 + 60%) |
| Technical  | \$48.75 (GS-12, Step 1, \$30.47 + 60%) |
| Clerical   | \$26.38 (GS-6, Step 3, \$16.49 + 60%)  |

These rates are from the Office of Personnel Management (OPM), 2018 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 at the end of this document in Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal).

### **(ii) Estimating Capital/Startup and Operation and Maintenance Costs**

The type of industry costs associated with the information collection activities in the subject standards 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 these regulations. 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**

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 are 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:

| <b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b> |  |  |   |   |   |                                 |
|--|--|--|---|---|---|---------------------------------|
| (A)<br>Continuous<br>Monitoring Device                               | (B)<br>Capital/<br>Startup Cost<br>for One<br>Respondent | (C)<br>Number of<br>New<br>Respondents | (D)<br>Total Capital/<br>Startup Cost,<br>(B X C) | (E)<br>Annual<br>O&M Costs<br>for One<br>Respondent | (F)<br>Number of<br>Respondents<br>with O&M | (G)<br>Total<br>O&M,<br>(E X F) |
| PID  | \$3,300  | 0                                      | \$0   | \$95  | 20  | \$1,900                         |
| 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  | 28,020                                      | \$67,248                        |
| Total  |  |  | \$583,000   |   |   | \$365,000                       |

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 \$365,000. 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 \$948,000. These are the 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 (EPA) cost during the three years of the ICR is estimated to be \$261,000.

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

|            |  |
|------------|--|
| Managerial | \$65.71 (GS-13, Step 5, \$41.07 + 60%) |
| Technical  | \$48.75 (GS-12, Step 1, \$30.47 + 60%) |
| Clerical   | \$26.38 (GS-6, Step 3, \$16.49 + 60%)  |

These rates are from the Office of Personnel Management (OPM), 2018 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 at the end of this document 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 28,020 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 28,020 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)<br>Number of New Respondents <sup>1</sup> | (B)<br>Number of Existing Respondents | (C)<br>Number of Existing Respondents that keep records but do not submit reports | (D)<br>Number of Existing Respondents That Are No Longer Subject <sup>2</sup> | (E)<br>Number of Respondents (E=A+B+C-D) |
| 1                     | 2,330   | 28,020                                | 0   | 2,330   | 28,020                                   |

| <b>Number of Respondents</b> |       |        |   |       |        |
|------------------------------|-------|--------|---|-------|--------|
| 2                            | 2,330 | 28,020 | 0 | 2,330 | 28,020 |
| 3                            | 2,330 | 28,020 | 0 | 2,330 | 28,020 |
| Average                      |       |        |   |       | 28,020 |

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

<sup>2</sup> 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 28,020.

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

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown below in Tables 1a, 1b, 1c, and 2 at the end of this document, 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: 1) Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal); 2) Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal); and 3) Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – 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. However, the burden for each worker category may vary depending on the task.

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 entities (private and Federal) are \$948,000. 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 \$261,000; 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 the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The adjustment increase in burden from the most recently-approved ICR is due to an increase in the number of existing major sources. The EPA's records indicate that there are currently 20 major sources subject to this NESHAP; the previous estimate of 12 major sources was based on the final amendments to the NESHAP in 2008. There is also an adjustment increase in operation and maintenance costs due to the increase in the number of respondents. Finally, there is an adjustment increase in labor costs to account for costs from major source facilities operated by Federal employees versus the private sector.

### **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 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-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 1a: Annual Respondent Burden and Cost for Private Facilities – 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 <sup>a</sup> | Technical hours per year | Management hours per year | Clerical hours per year | Total cost per year (\$) <sup>b</sup> |
|  |                      |                                     | (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 <sup>c</sup> | 1                    | 1                                   | 1                             | 28,013                            | 0                        | 28,013                    | 0                       | \$4,129,116                           |
| 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                     | \$610,423                             |
| Solvent consumption  | 1                    | 1                                   | 1                             | 2,330                             | 2,330                    | 116.5                     | 233                     | \$305,211                             |
| Compliance method report <sup>d</sup>                            | 1                    | 1                                   | 1                             | 1,631                             | 1,631                    | 81.55                     | 163.1                   | \$213,648                             |
| E. Write Report  |                      |                                     |                               |                                   |                          |                           |                         |                                       |
| Initial notification report                                      | 1                    | 1                                   | 1                             | 2,330                             | 2,330                    | 116.5                     | 233                     | \$305,211                             |
| Compliance method report <sup>c,d</sup>                          | 1                    | 1                                   | 1                             | 1,631                             | 0                        | 1,631                     | 0                       | \$240,409                             |
| Solvent consumption report <sup>c,e</sup>                        | 0.25                 | 1                                   | 0.25                          | 699                               | 0                        | 174.75                    | 0                       | \$25,758                              |
| Report-exceed consumption cutoff <sup>c,f</sup>                  | 1                    | 1                                   | 1                             | 117                               | 0                        | 117                       | 0                       | \$17,172                              |
| <b>Subtotal for Reporting Requirements</b>                       |                      |                                     |                               |                                   |                          | <b>42,529</b>             |                         | <b>\$5,846,949</b>                    |
| 4. Recordkeeping Requirements                                    |                      |                                     |                               |                                   |                          |                           |                         |                                       |
| A. Familiarization with the regulatory requirements              | See 3A               |                                     |                               |                                   |                          |                           |                         |                                       |
| B. Plan activities <sup>g</sup>                                  | 1                    | 1                                   | 1                             | 2,330                             | 2,330                    | 0                         | 0                       | \$274,754                             |
| C. Implement activities  |                      |                                     |                               |                                   |                          |                           |                         |                                       |
| Above consumption cutoff: Weekly LDAR <sup>g,h,i</sup>           | 0.75                 | 52                                  | 39                            | 19,595                            | 764,209                  | 0                         | 0                       | \$90,115,513                          |
| Below consumption cutoff: Bi-weekly                              | 0.75                 | 26                                  | 19.5                          | 8,398                             | 163,759                  | 0                         | 0                       | \$19,310,467                          |

|   |        |     |     |        |         |                  |        |                      |
|---|--------|-----|-----|--------|---------|------------------|--------|----------------------|
| LDAR <sup>g, i, j</sup>   |        |     |     |        |         |                  |        |                      |
| Major: Monthly enhanced LDAR <sup>k, l</sup>                                  | 1      | 48  | 48  | 13     | 624     | 31.2             | 62.4   | \$81,739             |
| Major: Weekly Carbon adsorber monitoring <sup>l, m</sup>                      | 0.25   | 208 | 52  | 13     | 676     | 33.8             | 67.6   | \$88,551             |
| Area: Monthly enhanced LDAR <sup>n, o</sup>                                   | 0.75   | 12  | 9   | 20,000 | 180,000 | 9,000            | 18,000 | \$23,578,560         |
| D. Develop record system  |        |     |     |        |         |                  |        |                      |
| Solvent consumption <sup>g</sup>  | 1      | 1   | 1   | 2,330  | 2,330   | 0                | 0      | \$274,754            |
| Enhanced LDAR <sup>g</sup>  | 1      | 1   | 1   | 2,330  | 2,330   | 0                | 0      | \$274,754            |
| Monitoring records <sup>d, g</sup>  | 1      | 1   | 1   | 1,631  | 1631    | 0                | 0      | \$192,328            |
| Carbon adsorber monitoring records <sup>p</sup>                               | 1      | 1   | 1   | 0      | 0       | 0                | 0      | \$0                  |
| E. Time to enter information  |        |     |     |        |         |                  |        |                      |
| Monthly records of solvent consumption <sup>q, r, s</sup>                     | 0.25   | 12  | 3   | 28,013 | 84,039  | 9                | 0      | \$9,911,205          |
| Above consumption cutoff: Records of weekly inspections <sup>h, i, s</sup>    | 0.25   | 52  | 13  | 19,595 | 254,736 | 39               | 0      | \$30,044,253         |
| Below consumption cutoff: Records of bi-weekly inspections <sup>g, i, j</sup> | 0.25   | 26  | 6.5 | 8,398  | 54,586  | 0                | 0      | \$6,436,822          |
| Major: Enhanced LDAR  | See 4C |     |     |        |         |                  |        |                      |
| Major: Carbon adsorber monitoring   | See 4C |     |     |        |         |                  |        |                      |
| Area: Enhanced LDAR   | See 4C |     |     |        |         |                  |        |                      |
| F. Time to Train personnel  |        |     |     |        |         |                  |        |                      |
| Leak detection <sup>t, u</sup>  | 1      | 2   | 2   | 2,330  | 4,660   | 4,660            | 0      | \$1,236,391          |
| G. Time for audits  | N/A    |     |     |        |         |                  |        |                      |
| <b>Subtotal for Recordkeeping Requirements</b>                                |        |     |     |        |         | <b>1,547,814</b> |        | <b>\$181,820,091</b> |
| <b>Total Labor Burden and Cost (rounded) <sup>v</sup></b>                     |        |     |     |        |         | <b>1,590,000</b> |        | <b>\$188,000,000</b> |
| <b>Total Capital and O&amp;M Cost (rounded) <sup>v</sup></b>                  |        |     |     |        |         |                  |        | <b>\$947,000</b>     |
| <b>Grand TOTAL (rounded) <sup>v</sup></b>                                     |        |     |     |        |         |                  |        | <b>\$189,000,000</b> |

### Assumptions

<sup>a</sup> 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 per year over the next three years. We assume that all existing and new area sources are private sector facilities. There are 20 existing major sources and 13 of these sources are private sector facilities. We assume that that no additional major sources will be subject to the NESHAP over the three-year period of this ICR.

- <sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.
- <sup>c</sup> This task requires management hours only.
- <sup>d</sup> We estimate that 1,631 (70 percent) of the 2,330 new facilities will be above the consumption cutoff and are required to perform this task.
- <sup>e</sup> We estimate that 699 (30 percent) of the 2,330 new facilities will be below the consumption cutoff (will consume less than 140 gallons of PCE per year) and are required to perform this task.
- <sup>f</sup> We estimate that 5 percent of new facilities each year will exceed the cutoff, thus requiring submission of the exceed-consumption cutoff report.
- <sup>g</sup> This task requires only technical employee hours.
- <sup>h</sup> Occurrences are based on weekly inspection, assuming 52 weeks per year.
- <sup>i</sup> We have assumed that of 28,000 area source 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 area source perchloroethylene dry cleaners will be below the consumption cutoff and are only required to conduct bi-weekly leak detection and repair.
- <sup>j</sup> We have assumed that facilities below consumption cutoff perform leak detection and repairs on a bi-weekly basis.
- <sup>k</sup> Major sources contain an average of four machines. This task requires 1 hour times 4 machines per major source.
- <sup>l</sup> There are 13 existing private sector major sources-subject to the NESHAP.
- <sup>m</sup> This task requires 0.25 hours times 4 machines per major source per week.
- <sup>n</sup> Area sources contain an average of one machine. This task requires 0.75 hours times 1 machine per area source.
- <sup>o</sup> 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.
- <sup>p</sup> 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.
- <sup>q</sup> Occurrences are based on twelve months rolling average of PCE consumption, determined once per month.
- <sup>r</sup> This is based on 28,000 area sources and 13 private sector major sources performing this task every year.
- <sup>s</sup> 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.
- <sup>t</sup> Estimate includes hours for training one owner/operator and one employee.
- <sup>u</sup> This task requires an equal amount of management and technical employee hours.
- <sup>v</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHP 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 <sup>a</sup> | Technical hours per year | Management hours per year | Clerical hours per year | Total cost per year (\$) <sup>b</sup> |
|  |                      |                                     | (AxB)                         |                                   | (Cx D)                   | (Ex0.05)                  | (Ex0.10)                |                                       |
| 1. Applications  | N/A                  |                                     |                               |                                   |                          |                           |                         |                                       |
| 2. Survey and Studies  | N/A                  |                                     |                               |                                   |                          |                           |                         |                                       |
| 3. Reporting Requirements  |                      |                                     |                               |                                   |                          |                           |                         |                                       |
| A. Familiarization with the regulatory requirements <sup>c</sup> | 1                    | 1                                   | 1                             | 7                                 | 0                        | 7                         | 0                       | \$460                                 |
| B. Required activities   | N/A                  |                                     |                               |                                   |                          |                           |                         |                                       |
| C. Create Information  | N/A                  |                                     |                               |                                   |                          |                           |                         |                                       |
| D. Gather existing information                                   |                      |                                     |                               |                                   |                          |                           |                         |                                       |
| Initial report information                                       | 2                    | 1                                   | 2                             | 0                                 | 0                        | 0                         | 0                       | \$0                                   |
| Solvent consumption  | 1                    | 1                                   | 1                             | 0                                 | 0                        | 0                         | 0                       | \$0                                   |
| Compliance method report   | 1                    | 1                                   | 1                             | 0                                 | 0                        | 0                         | 0                       | \$0                                   |
| E. Write Report  |                      |                                     |                               |                                   |                          |                           |                         |                                       |
| Initial notification report                                      | 1                    | 1                                   | 1                             | 0                                 | 0                        | 0                         | 0                       | \$0                                   |
| Compliance method report <sup>c</sup>                            | 1                    | 1                                   | 1                             | 0                                 | 0                        | 0                         | 0                       | \$0                                   |
| Solvent consumption report <sup>c</sup>                          | 0.25                 | 1                                   | 0.25                          | 0                                 | 0                        | 0                         | 0                       | \$0                                   |
| Report-exceed consumption cutoff <sup>c</sup>                    | 1                    | 1                                   | 1                             | 0                                 | 0                        | 0                         | 0                       | \$0                                   |
| <b>Subtotal for Reporting Requirements</b>                       |                      |                                     |                               |                                   |                          | <b>7</b>                  |                         | <b>\$460</b>                          |
| 4. Recordkeeping Requirements                                    |                      |                                     |                               |                                   |                          |                           |                         |                                       |
| A. Familiarization with the regulatory requirements              | See 3A               |                                     |                               |                                   |                          |                           |                         |                                       |
| B. Plan activities   | 1                    | 1                                   | 1                             | 0                                 | 0                        | 0                         | 0                       | \$0                                   |
| C. Implement activities  |                      |                                     |                               |                                   |                          |                           |                         |                                       |
| Above consumption cutoff: Weekly LDAR                            | 0.75                 | 52                                  | 39                            | 0                                 | 0                        | 0                         | 0                       | \$0                                   |
| Below consumption cutoff: Bi-weekly                              | 0.75                 | 26                                  | 19.5                          | 0                                 | 0                        | 0                         | 0                       | \$0                                   |

|  |        |     |     |   |     |            |    |                 |
|--|--------|-----|-----|---|-----|------------|----|-----------------|
| LDAR   |        |     |     |   |     |            |    |                 |
| Major: Monthly enhanced LDAR <sup>d, e</sup>                 | 1      | 48  | 48  | 7 | 336 | 17         | 34 | \$18,370        |
| Major: Weekly Carbon adsorber monitoring <sup>e, f</sup>     | 0.25   | 208 | 52  | 7 | 364 | 18         | 36 | \$19,901        |
| Area: Monthly enhanced LDAR                                  | 0.75   | 12  | 9   | 0 | 0   | 0          | 0  | \$0             |
| D. Develop record system                                     |        |     |     |   |     |            |    |                 |
| Solvent consumption  | 1      | 1   | 1   | 0 | 0   | 0          | 0  | \$0             |
| Enhanced LDAR  | 1      | 1   | 1   | 0 | 0   | 0          | 0  | \$0             |
| Monitoring records   | 1      | 1   | 1   | 0 | 0   | 0          | 0  | \$0             |
| Carbon adsorber monitoring records <sup>g</sup>              | 1      | 1   | 1   | 0 | 0   | 0          | 0  | \$0             |
| E. Time to enter information                                 |        |     |     |   |     |            |    |                 |
| Monthly records of solvent consumption <sup>h, i, j</sup>    | 0.25   | 12  | 3   | 7 | 21  | 9          | 0  | \$1,615         |
| Above consumption cutoff: Records of weekly inspections      | 0.25   | 52  | 13  | 0 | 0   | 0          | 0  | \$0             |
| Below consumption cutoff: Records of bi-weekly inspections   | 0.25   | 26  | 6.5 | 0 | 0   | 0          | 0  | \$0             |
| Major: Enhanced LDAR   | See 4C |     |     |   |     |            |    |                 |
| Major: Carbon adsorber monitoring                            | See 4C |     |     |   |     |            |    |                 |
| Area: Enhanced LDAR  | See 4C |     |     |   |     |            |    |                 |
| F. Time to Train personnel                                   |        |     |     |   |     |            |    |                 |
| Leak detection   | 1      | 2   | 2   | 0 | 0   | 0          | 0  | \$0             |
| G. Time for audits   | N/A    |     |     |   |     |            |    |                 |
| <b>Subtotal for Recordkeeping Requirements</b>               |        |     |     |   |     | <b>835</b> |    | <b>\$39,887</b> |
| <b>Total Labor Burden and Cost (rounded) <sup>k</sup></b>    |        |     |     |   |     | <b>842</b> |    | <b>\$40,300</b> |
| <b>Total Capital and O&amp;M Cost (rounded) <sup>k</sup></b> |        |     |     |   |     |            |    | <b>\$680</b>    |
| <b>Grand TOTAL (rounded) <sup>k</sup></b>                    |        |     |     |   |     |            |    | <b>\$41,000</b> |

### Assumptions

<sup>a</sup> There are 7 existing major sources that are federal facilities and we assume that that no additional major sources will be subject to the NESHAP over the three-year period of this ICR.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and Clerical rate of \$26.38 (GS-6, Step 3, \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) "2018 General Schedule" which excludes locality rates of pay.

<sup>c</sup> This task requires management hours only.

<sup>d</sup> Major sources contain an average of four machines. This task requires 1 hour times 4 machines per major source.

<sup>e</sup> There are 7 existing public sector major sources-subject to the NESHAP.

<sup>f</sup> This task requires 0.25 hours times 4 machines per major source per week.

<sup>g</sup> 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.

<sup>h</sup> Occurrences are based on twelve months rolling average of PCE consumption, determined once per month.

<sup>i</sup> This is based on 7 major sources performing this task every year.

<sup>j</sup> 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.

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

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

| Affected Sector  | Number of Responses | Labor Hours |               |           | Labor Cost    | Capital and O&M Cost |
|------------------|---------------------|-------------|---------------|-----------|---------------|----------------------|
|                  |                     | Reporting   | Recordkeeping | Total     |               |                      |
| Private          | 30,460              | 42,529      | 1,547,814     | 1,590,343 | \$188,000,000 | \$947,000            |
| Public (Federal) | 7                   | 7           | 835           | 842       | \$40,300      | \$680                |
| Total            | 30,467              | 42,536      | 1,548,649     | 1,591,185 | \$188,040,300 | \$947,680            |
| Total (rounded)  |                     |             |               | 1,590,000 | \$188,000,000 | \$948,000            |

**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 hrs per occurrence | Occurrences per year <sup>a</sup> | Technical hrs per year (AxB) | Management hrs per year (Cx0.05) | Clerical hrs per year (Cx0.10) | Total cost per year (\$) <sup>b</sup> |
| 1. Report review                                 |                                  |                                   |                              |                                  |                                |                                       |
| A. Initial notification report                   | 1                                | 2,330                             | 2,330                        | 116.5                            | 233                            | \$127,389.26                          |
| B. Compliance method report <sup>c</sup>         | 1                                | 1,631                             | 1,631                        | 81.55                            | 163.1                          | \$89,172.48                           |
| C. Solvent consumption report <sup>d</sup>       | 1                                | 699                               | 699                          | 34.95                            | 69.9                           | \$38,216.78                           |
| D. Report-exceed consumption cutoff <sup>e</sup> | 1                                | 117                               | 117                          | 5.83                             | 11.7                           | \$6,369.46                            |
| <b>TOTAL (rounded) <sup>f</sup></b>              |                                  |                                   |                              | <b>5,490</b>                     |                                | <b>\$261,000</b>                      |

**Assumptions:**

<sup>a</sup> 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 per year over the next three years. There are 20 existing major sources and we assume that that no additional major sources will be subject to the NESHAP over the three-year period of this ICR.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and Clerical rate of \$26.38 (GS-6, Step 3, \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which excludes locality rates of pay.

<sup>c</sup> We estimate that 1,631 (70 percent) of the 2,330 new facilities will be above the consumption cutoff and are required to perform this task.

<sup>d</sup> We estimate that 699 (30 percent) of the 2,330 new facilities will be below the consumption cutoff (will consume less than 140 gallons of PCE per year) and are required to perform this task.

<sup>e</sup> We assume that five percent of new sources will have to report-exceed consumption cutoff.

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