

Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Perchloroethy (Renewal)

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

Leak detection ^{t,u}	1	2	2
G. Time for audits	N/A		
Subtotal for Recordkeeping Requirements			
Total Labor Burden and Cost (rounded) ^v			
Total Capital and O&M Cost (rounded) ^v			
Grand TOTAL (rounded) ^v			

Assumptions

^a We have assumed that there are 28,000 existing area sources and that 2,330 sources will leave the industry and will be replaced. All existing and new area sources are private sector facilities. There are 20 existing major sources and 13 of these sources are private sector major sources subject to the NESHAP over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for non-executive labor from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by Occupational Group." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c This task requires management hours only.

^d We estimate that 1,631 (70 percent) of the 2,330 new facilities will be above the consumption cutoff and are required to perform leak detection and repairs.

^e We estimate that 699 (30 percent) of the 2,330 new facilities will be below the consumption cutoff (will consume less than 1 lb of PCE per month).

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

^g This task requires only technical employee hours.

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

ⁱ We have assumed that of 28,000 area source perchloroethylene dry cleaners, 19,600 (70 percent) will be above the per consumption cutoff and are required to perform leak detection and repairs. The remaining 8,400 area source perchloroethylene dry cleaners will be below the consumption cutoff and are only subject to the NESHAP.

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

^k Major sources contain an average of four machines. This task requires 1 hour times 4 machines per major source.

^l There are 13 existing private sector major sources-subject to the NESHAP.

^m This task requires 0.25 hours times 4 machines per major source per week.

ⁿ Area sources contain an average of one machine. This task requires 0.75 hours times 1 machine per area source.

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

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

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

^r This is based on 28,000 area sources and 13 private sector major sources performing this task every year.

^s This task is performed primarily by technical staff. Management hours are only for a limited number of major sources, and only for a limited number of occurrences.

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

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

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

ylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M)

D	E	F	G	H
Respondents per year ^a	Technical hours per year	Management hours per year	Clerical hours per year	Total cost per year (\$) ^b
	(CxD)	(Ex0.05)	(Ex0.10)	
28,013	0	28,013	0	\$4,129,116
2,330	4,660	233	466	\$610,423
2,330	2,330	116.5	233	\$305,211
1,631	1,631	81.55	163.1	\$213,648
2,330	2,330	116.5	233	\$305,211
1,631	0	1,631	0	\$240,409
699	0	174.75	0	\$25,758
117	0	117	0	\$17,172
		42,529		\$5,846,949
2,330	2,330	0	0	\$274,754
19,595	764,209	0	0	\$90,115,513
8,398	163,759	0	0	\$19,310,467
13	624	31.2	62.4	\$81,739
13	676	33.8	67.6	\$88,551
20,000	180,000	9,000	18,000	\$23,578,560
2,330	2,330	0	0	\$274,754
2,330	2,330	0	0	\$274,754
1,631	1631	0	0	\$192,328
0	0	0	0	\$0
28,013	84,039	9	0	\$9,911,205
19,595	254,736	39	0	\$30,044,253
8,398	54,586	0	0	\$6,436,822

Labor Rates:	
Management	\$147.40
Technical	\$117.92
Clerical	\$57.02

2,330	4,660	4,660	0	\$1,236,391
	1,547,814			\$181,820,091
	1,590,000			\$188,000,000
				\$947,000
				\$189,000,000

ced by 2,330 new area sources per year over the next three years. We assume that private sector facilities. We assume that that no additional major sources will be

hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are normal and Industry group.” The rates are from column 1, “Total Compensation.”

form this task.

140 gallons of PCE per year) and are required to perform this task.

option cutoff report.

option cutoff, which will require that the cleaner conduct weekly leak detection and repair required to conduct bi-weekly leak detection and repair.

existing area sources are subject to the NESHAP's enhanced LDAR program.

ment of carbon adsorber monitoring record systems.

we assume only three major sources will require managerial review.

Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Perchloroethy (Renewal)

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

Total Labor Burden and Cost (rounded) ^k			
Total Capital and O&M Cost (rounded) ^k			
Grand TOTAL (rounded) ^k			

Assumptions

- ^a There are 7 existing major sources that are federal facilities and we assume that that no additional major sources will be subj
- ^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for governn 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%). Th Schedule” which excludes locality rates of pay.
- ^c This task requires management hours only.
- ^d Major sources contain an average of four machines. This task requires 1 hour times 4 machines per major source.
- ^e There are 7 existing public sector major sources-subject to the NESHAP.
- ^f This task requires 0.25 hours times 4 machines per major source per week.
- ^g No new major sources are expected for the three-year period of this ICR; therefore, no burden is associated with the develop
- ^h Occurrences are based on twelve months rolling average of PCE consumption, determined once per month.
- ⁱ This is based on 7 major sources performing this task every year.
- ^j This task is performed primarily by technical staff. Management hours are only for a limited number of major sources, and
- ^k Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M)

D	E	F	G	H
Respondents per year ^a	Technical hours per year	Management hours per year	Clerical hours per year	Total cost per year (\$) ^b
	(CxD)	(Ex0.05)	(Ex0.10)	
7	0	7	0	\$460
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
		7		\$460
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
7	336	17	34	\$18,370
7	364	18	36	\$19,901
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
7	21	9	0	\$1,615
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
		835		\$39,887

Labor Rates:	
Management	\$65.71
Technical	\$48.75
Clerical	\$26.38

	842			\$40,300
				\$680
				\$41,000

ject to the NESHAP over the three-year period of this ICR.

ment overhead expenses: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 +
 ese rates are from the Office of Personnel Management (OPM) "2018 General

ment of carbon adsorber monitoring record systems.

we assume only three major sources will require managerial review.

Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – NESI Facilities (40 CFR Part 63, Subpart M) (Renewal)

Affected Sector	Number of Responses	Labor Hours	
		Reporting	Recordkeeping
Private	30,460	42,529	1,547,814
Public (Federal)	7	7	835
Total	30,467	42,536	1,548,649
Total (rounded)			

IAP for Perchloroethylene Dry Cleaning

Total	Labor Cost	Capital and O&M Cost
1,590,343	\$188,000,000	\$947,000
842	\$40,300	\$680
1,591,185	\$188,040,300	\$947,680
1,590,000	\$188,000,000	\$948,000

52 hrs/response

Table 2: Average Annual EPA Burden and Cost - NESHAP for Perchloroethylene Dry Subpart M) (Renewal)

Burden Item	A	B	C
	EPA technical hrs per occurrence	Occurrences per year ^a	Technical hrs per year (AxB)
1. Report review			
A. Initial notification report	1	2,330	2,330
B. Compliance method report ^c	1	1,631	1,631
C. Solvent consumption report ^d	1	699	699
D. Report-exceed consumption cutoff ^e	1	117	117
TOTAL (rounded) ^f			

Assumptions:

^a We have assumed that there are 28,000 existing area sources and that 2,330 sources will leave the industry a year over the next three years. There are 20 existing major sources and we assume that that no additional major three-year period of this ICR.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for a rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and C. These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which excludes locum tenens.

^c 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.

^d We estimate that 699 (30 percent) of the 2,330 new facilities will be below the consumption cutoff (will not be required to perform this task).

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

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

y Cleaning Facilities (40 CFR Part 63,

F	G	H
Management hrs per year (Cx0.05)	Clerical hrs per year (Cx0.10)	Total cost per year (\$) ^b
116.5	233	\$127,389.26
81.55	163.1	\$89,172.48
34.95	69.9	\$38,216.78
5.83	11.7	\$6,369.46
5,490		\$261,000

Labor Rates:	
Management	\$65.71
Technical	\$48.75
Clerical	\$26.38

nd will be replaced by 2,330 new area sources per
 or sources will be subject to the NESHAP over the

unt for government overhead expenses: Managerial
 clerical rate of \$26.38 (GS-6, Step 3, \$16.49 + 60%).
 cality rates of pay.

required to perform this task.

sume less than 140 gallons of PCE per year) and are

Capital/Startup vs. Operation and Maintenance (O&M) Costs - Private Sector

(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M
PID	\$3,300	0	\$0	\$95	13
HHD	\$250	2,330	\$582,500	\$14	20,000
Initial notification & compliance report	-	-	-	\$6.37	2,330
Report exceed consumption cutoff	-	-	-	\$6	117
Photocopying	-	-	-	\$2.40	28,013
Total			\$582,500		
Total (rounded)			\$583,000		

Total (rounded)

Number of Respondents

	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	(D)	(E)
	(A)	(B)	(C)		
Year	Number of New Respondents ¹	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are No Longer Subject ²	Number of Respondents (E=A+B+C-D)
1	2,330	28,020	0	2,330	28,020
2	2,330	28,020	0	2,330	28,020
3	2,330	28,020	0	2,330	28,020
Average					28,020

¹ New respondent include sources with constructed, reconstructed and modified affected facilities.

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

Total Annual Responses - Private Sector

(A)	(B)	(C)	(D)	(E)
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Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Write Initial Notification Report	2,330	1	25,683	28,013
Compliance Method Report	1,631	1	0	1,631
Solvent Consumption Report	699	1	0	699
Report Exceed Consumption Cutoff	117	1	0	117
			Total	30,460

(G)
Total O&M, (E X F)
\$1,235
\$280,000
\$14,842
\$702
\$67,231
\$364,010
\$364,000
\$947,000

Capital/Startup vs. Operation and Maintenance			
(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)
PID	\$3,300	0	\$0
HHD	\$250	0	\$0
Initial notification & compliance report	-	-	-
Report exceed consumption cutoff	-	-	-
Photocopying	-	-	-
Total			\$0
Total (rounded)			\$0

Total Annual Responses - Public Sector				
(A)	(B)	(C)	(D)	(E)

Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Write Initial Notification Report	0	0	7	7
Compliance Method Report	0	0	0	0
Solvent Consumption Report	0	0	0	0
Report Exceed Consumption Cutoff	0	0	0	0
			Total	7

Annual O&M Costs - Public Sector		
(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F)
\$95	7	\$665
\$14	0	\$0
\$6.37	0	\$0
\$6	0	\$0
\$2.40	7	\$17
		\$682
		\$680
Total (rounded)		\$680