

Table 1: Annual Respondent Burden and Cost – NESHAP for Wood Furniture Manufacturing Operations (40 CFR Part 63, Subpart JJ) (Renewal)

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
1. Applications for construction, reconstruction, and modification ^c	4	1	4	18	72	3.6	7.2	\$9,809.28
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarization with the regulatory requirements	1	1	1	230	230	11.5	23.0	\$31,335.20
B. Create information ^d	See 4D							
C. Gather existing information	See 3D							
D. Write reports								
Notification of applicability (one-time) ^a	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction ^c	2	1	2	4	8	0.4	0.8	\$1,089.92
Notification of modification (physical/operational changes) ^c	8	1	8	14	112	5.6	11.2	\$15,258.88
Notification of anticipated startup (including reconstruction and modification) ^c	2	1	2	18	36	1.8	3.6	\$4,904.64
Notification of actual startup ^c	2	1	2	18	36	1.8	3.6	\$4,904.64
Notification of performance test ^c	2	1	2	2	4	0.2	0	\$544.96
Notification of increased annual VHAP usage ^d	2	1	2	0	0	0	0	\$0
Notification of compliance status / Semiannual compliance status reports (compliant coatings) ^e	4	2	8	128	1,024	51	102	\$139,509.76
Semiannual compliance status reports (control devices) ^f	4	2	8	13	104	5.2	10.4	\$14,168.96
Quarterly excess emissions reports ^g	4	4	16	1	16	0.8	1.6	\$2,179.84
Subtotal for Reporting Requirements						1,888		\$223,706
4. Recordkeeping requirements								
A. Familiarization with the regulatory requirements	See 3A							
B. Plan activities	N/A							
C. Implement activities	N/A							
Prepare work practice standards implementation plan ^h	8	1	8	18	144	7.2	14.4	\$19,618.56
Prepare leak inspection and maintenance plan ^h	8	1	8	18	144	7.2	14.4	\$19,618.56
Formulation assessment plan ^h	8	1	8	18	144	7.2	14.4	\$19,618.56
D. Time to enter information								
Records of applicability ⁱ	1	1	1	18	18	0.9	1.8	\$2,452.32
Records of performance test ^c	1	1	1	2	2	0.1	0.2	\$272.48
Records of types and quantities of materials used, including VHAP, VOC, viscosity and solids content data ^j	1.5	12	18	142	2,556	128	256	\$348,229.44
Records of formaldehyde content ^k	2	12	24	52	1,248	62	125	\$170,027.52
Records of CMS parameters ^l	1.5	52	78	14	1,092	55	109	\$148,774.08
Records of monthly averaging calculations ^m	2	12	24	32	768	38	77	\$104,632.32
Records of operators training work practice ⁿ	1	1	1	142	142	7.1	14.2	\$19,346.08

Records of other work practices (inspection and maintenance, solvent accounting, formulation assessment) ^o	2	12	24	142	3,408	170	341	\$464,305.92
Records of semi-annual reports and supporting calculations ^{e,f}	1	2	2	141	282	14.1	28.2	\$38,419.68
Records of quarterly reports and supporting calculations ^g	1	4	4	1	4.0	0.2	0.4	\$544.96
Records of start-up, shutdown and malfunction ^p	2	12	24	1	24	1.2	2.4	\$3,269.76
E. Records for incidental and area sources ^q	1	12	12	88	1,056	53	106	\$143,869.44
F. Annual personnel refresher course ^a	8	1	8	142	1,136	57	114	\$154,768.64
G. Audits	N/A							
Subtotal for Recordkeeping Requirements						13,993		\$1,657,768
TOTAL LABOR BURDEN AND COSTS (rounded) ^r						15,900		\$1,880,000
TOTAL CAPITAL AND O&M COST (rounded) ^r								\$12,900
GRAND TOTAL (rounded) ^r								\$1,890,000

Assumptions

^a EPA estimates 142 existing major sources and 88 existing incidental/area sources will be subject to the standard. No new major or area sources will become subject over the next 3 years, therefore the one-time notification of applicability requirement does not apply. Modified or reconstructed sources will submit their applicability notifications as part of their notifications of construction or modification. We assume that each source subject to the standard will have to familiarize with the regulatory requirements each year.

^b This ICR uses the following labor rates: \$122.66 (technical), \$149.84 (managerial), and \$60.88 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, "Table 2. Civilian workers, by occupational and industry group." The rates are from column 1, "Total compensation." They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Wood Furniture Manufacturing Operations (40 CFR Part 63, Subpart JJ) (Renewal)

Burden Item	A	B	C	D	E	F	G
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)

H
Total cost per year (\$) ^b

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
1	18	142	88	18
2	18	142	88	18
3	18	142	88	18
Average	18	142	88	18

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=(BxC)+D
Application for construction, reconstruction, and modification	18	1	0	18
Notification of applicability (one-time)	0	0	0	0
Notification of construction/reconstruction	4	1	0	4
Notification of modification	14	1	0	14
Notification of anticipated startup	18	1	0	18
Notification of actual startup	18	1	0	18
Notification of performance test	2	1	0	2
Notification of increased annual VHAP usage	0	0	0	0
Semiannual compliance status reports (compliant coatings) ^e	128	2	0	256
Semiannual compliance status reports (control devices) ^f	13	2	0	26
Quarterly excess emissions reports	1	4	0	4
Records for incidental and area sources			88	88
			Total	448

Source Type	Number
Existing (major)	142
Existing (area)	88
Formaldehyde	52
New	0

Capital/Startup vs. Operation and Maintenance (O&M) Costs				
(A)	(B)	(C)	(D)	(E)
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
Control device (several options available)	\$0	0	\$0	\$924

^a EPA assumes 10% of affected major sources will use control devices to comply with the standard ($142 \times 0.1 = 14$,

^b The annual O&M costs have been updated from year 2001 to year 2019 using the CEPCI Index.

(E) Number of Respondents
(E=A+B+C-D)
230
230
230
230

(F)	(G)
Number of Respondents with O&M ^a	Total O&M, (ExF)
14	\$12,900

after rounding).

CEPCI Index		
Year 2001	394.3	\$600.00
Year 2019	607.5	\$924.42