

**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 1176.14, OMB Control Number 2060-0161.

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

The New Source Performance Standards (NSPS) for New Residential Wood Heaters (40 CFR Part 60, Subpart AAA) were proposed on February 18, 1987; promulgated on February 26, 1988; and amended on: March 6, 2015; April 2, 2020 (85 FR 18448); and October 7, 2020 (85 FR 63394). These regulations apply to existing and new manufacturers, sellers, distributors, importers, installers, and operators of wood heating appliances. 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. The April 2, 2020 final rule revised the requirements for pellet fuel, but this change did not result in any change in burden. The October 7, 2020 amendment revised the test methods and procedures, but this change did not result in any change in burden. This information is being collected to assure compliance with 40 CFR Part 60, Subpart AAA.

One feature of the NSPS for Subpart AAA requires emphasis at the outset, which is that the requirements of Subpart AAA establish a certification program, instead of the usual NSPS requirements. In this certification program, each affected manufacturer of wood heating appliances is required to demonstrate compliance for each of its model lines through performance testing. Under the Subpart AAA 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 either intentional or accidental misuse of the certification approach, Subpart AAA includes several safeguards. These safeguards include the use of approved third-party testing labs, approved third-party certifiers, compliance audit testing, annual quality assurance auditing, 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.

The respondents to NSPS Subpart AAA are manufacturers of wood heating appliances, EPA-approved testing laboratories, and EPA-approved third-party certifiers. Any respondent subject to the provisions of this part shall maintain records of compliance/performance tests and quality assurance audits and retain these files for at least five years following the date of such measurements, maintenance reports, and records. All performance test reports are required to be submitted electronically to [WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov). Under Subpart AAA, wood heater manufacturers, 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 either grant or deny laboratory accreditation, assure continued test lab proficiency and to assist in enforcement and compliance activities. None of the manufacturers, testing labs, or third-party certifiers are owned by either state, local, tribal entities 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 51 manufacturers per year will be subject to these standards, and no additional manufacturers will become subject to these same standards. Over the next three years, EPA expects manufacturers to introduce a total of 15 new model lines per year. Over the next three years, 11 testing laboratories and third-party certifiers<sup>1</sup> will be subject to these standards, and no additional testing laboratories and third-party certifiers will become subject to these same standards. The estimate of the number of manufacturers is based on recent EPA certification data that reflects manufacturers with certified model lines that meet Subpart AAA’s Step 2 PM standards, which went into effect on May 15, 2020. The estimate of the number of new model lines is based on changes in EPA data on the number of certified model lines since the previous ICR. The estimate of approved testing laboratories and third-party certifiers reflects EPA’s most-recent listing of EPA-approved test laboratories and third-party certifiers. There is no anticipated growth in the number of manufacturers, EPA-approved test labs, or EPA-approved third-party certifiers.

The Office of Management and Budget (OMB) approved the currently-active ICR

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1 There are 8 EPA-approved test laboratories and 8 EPA-approved third-party certifiers. There is a total of 11 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.  
[https://www.epa.gov/sites/default/files/2021-04/documents/epa\\_approved\\_test\\_labs\\_and\\_third\\_party\\_certifiers\\_april\\_2021.pdf](https://www.epa.gov/sites/default/files/2021-04/documents/epa_approved_test_labs_and_third_party_certifiers_april_2021.pdf)

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 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, particulate matter (PM) emissions from wood heating appliances cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, 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. Under Subpart AAA, all performance test reports are required to be submitted electronically to [WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov).

### **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**

For reports required to be submitted electronically, the information is sent electronically to [WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov), where the appropriate EPA regional office can review it, as well as for state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, 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 either the delegated state or local agency. If a state or local agency has adopted its own 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* (86 FR 19256) on April 13, 2021. 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 51 manufacturers and 11 testing laboratories/third-party certifiers respondents will be subject to these 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 that these standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Pellet Fuels institute, at (651) 398-9154, and the Hearth, Patio & Barbecue Association, at (703) 522-0086. 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 same 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 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 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:

<b>Standard (40 CFR Part 60, Subpart AAA)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
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:

<b>Notifications</b>	
Notification from the manufacturer of certification testing	§60.534(g)

<b>Reports</b>	
<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)

<b>Reports</b>	
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 quality assurance audit report	§60.533(m)(5)
EPA compliance audit test results	§60.533(n)
Performance test data (electronic submission to <i>(WoodHeaterReports@epa.gov)</i> )	§60.534(a)(1), §60.537(f)
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)(l)
Proficiency test and all test documentation	§60.535(a)(2)(i), §60.537(b)
Accreditation credentials	§60.537(b)
Submission of preliminary test reports	§60.533(n)(3)(iii), §60.535(a)(2)(iv)
<i>Third-party verifiers</i>	
Application for EPA approval as a certifier	§60.535(d)(1)
Report of quality assurance program audits	§60.533(m)(4), §60.535(d)(2)
Certification tests, quality assurance program inspection reports, and accreditation credentials	§60.537(b)
Annual quality assurance audits	§60.533(f), §60.533(m)

A source must keep the following records:

<b>Recordkeeping</b>	
<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)

<b>Recordkeeping</b>	
<i>Test Laboratories</i>	
Records of all documentation pertaining to each certification test, quality assurance program inspection and audit tests, and reports	§60.537(b)
Laboratory proficiency tests	§60.537(b)
<i>Third-party certifiers</i>	
Records of all documentation pertaining to each certification test, quality assurance program inspection and audit tests, and reports	§ 60.537(b)

### Electronic Reporting

All reports are sent directly to the EPA electronically at [WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov). Data obtained from reports submitted and records maintained by the respondents will be used in compliance and enforcement programs. Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
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.
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 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.



<b>Respondent Activities</b>
Transmit, or otherwise disclose the information.

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

**5(a) Agency Activities**

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

<b>Agency Activities</b>
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.
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.
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 are 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 online at: <https://www.epa.gov/compliance/wood-heater-compliance-monitoring-program>.

The records required by this regulation must be retained by the owner/operator for five years.

### **5(c) Small Entity Flexibility**

Most of the manufacturers and laboratories affected by the requirements of NSPS, Subpart AAA, are considered small businesses based on the definition used by the Small Business Administration. Efforts were taken by the EPA to reduce the burden imposed on the smallest businesses affected by this regulation. We have included 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 at the end of this document 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 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 4,380 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the 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	\$153.55 (\$73.12 + 110%)
Technical	\$122.20 (\$58.19 + 110%)
Clerical	\$61.51 (\$29.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” These 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 standards are both labor costs which are addressed elsewhere in this ICR, capital/startup costs, and the costs associated with compliance audit testing. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs of compliance audit testing and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Data Collection Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/ Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondent s with O&M	(G) Total O&M, (E X F)
Certification Test <sup>a</sup>	\$16,750	15	\$251,250			
Cost of Permanent Label <sup>b</sup>	\$400	15	\$6,000			
Prepare Quality Assurance Plan <sup>c</sup>	\$5,000	15	\$75,000			
Owner’s Manual <sup>d</sup>	\$2,250	15	\$33,750			
Quality Assurance Testing <sup>e</sup>				\$16,750	17	\$284,750
EPA Compliance Audit Test <sup>e</sup>				\$17,815	0.33	\$5,938
ISO Accreditation-Test Laboratories <sup>f</sup>	\$75,000	0	\$0			
ISO Accreditation-Third-Party Certifiers <sup>g</sup>	\$75,000	0	\$0			
<b>Totals <sup>h</sup></b>			\$366,000			\$291,000

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						

<sup>a</sup> 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 15 models each year during the three-year ICR period.

<sup>b</sup> Total costs of permanent labels are estimated to be \$400 per model. We assume 15 new models per year will require permanent labels during the three-year period of this ICR.

<sup>c</sup> Manufacturers of new model lines are required to prepare a quality assurance plan for each new model line.

<sup>d</sup> Manufacturers are required to prepare an Owner's Manual for each new model line. We assume an average fixed cost of \$2,250 for preparation of an owner's manual.

<sup>e</sup> We assume that each manufacturer will perform a performance test under their quality assurance program once during the three-year period of this ICR at a cost of \$16,750 per test.

<sup>f</sup> We assume that EPA will select one wood heater model line for compliance audit testing during the three-year period of 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).

<sup>g</sup> We assume all eight test labs are already ISO accredited.

<sup>h</sup> We assume all eight third-party certifiers are already ISO accredited.

<sup>i</sup> Totals have been rounded to three significant values. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are \$366,000. This is the total of column D in the above table. The total operation and maintenance (O&M) costs for this ICR are \$291,000. 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 \$657,000. 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. The 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 \$75,000.

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

Managerial	\$69.04 (GS-13, Step 5, \$43.15 + 60%)
Technical	\$51.23 (GS-12, Step 1, \$32.02 + 60%)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 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 at the end of this document 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 51 existing manufacturers and 11 existing testing laboratories and third-party certifiers (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 62 per year. In addition, the 51 manufacturers have 253 certified woodstove model lines. The number of certified model lines is expected to increase by 15 per year during the three-year period of this ICR.

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)
<b>Woodstove Manufacturers <sup>a</sup></b>					
1	0	51	0	0	51
2	0	51	0	0	51
3	0	51	0	0	51
Average	0	51	0	0	51
<b>Test Labs / Third-Party Certifiers <sup>b</sup></b>					
1	0	11	0	0	11
2	0	11	0	0	11
3	0	11	0	0	11
Average	0	11	0	0	11

<sup>a</sup> The EPA Certified Wood Heater Database indicates there are currently 51 woodstove manufacturers with 253 certified model lines. We assume no new manufacturers will enter this industry and become respondents in the three-year period of this ICR. We assume existing manufacturers will apply for certification of a total of 15 new model lines each year during the three-year period of this ICR.

<sup>b</sup> The database of EPA-approved test labs and third-party certifiers shows there are 8 approved test labs and 8 approved third-party certifiers for a total of eleven approved organizations. ([https://www.epa.gov/sites/production/files/2021-04/documents/epa\\_approved\\_test\\_labs\\_and\\_third\\_party\\_certifiers\\_april\\_2021.pdf](https://www.epa.gov/sites/production/files/2021-04/documents/epa_approved_test_labs_and_third_party_certifiers_april_2021.pdf)) We assume that no new Test Labs and Third-Party Certifiers will apply for approval during the

three-year period of this ICR. Test Labs and Third-Party Certifiers must reapply for approval every five years. We assume that all labs/certifiers will reapply and receive approval.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents (manufacturers, test labs, and third-party certifiers) over the three-year period of this ICR is 62.

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

<b>Total Annual Responses</b>				
(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
<i>Manufacturers - New Model Lines</i>				
Test notification for new model lines <sup>a</sup>	15	1	0	15
Application for certification for new model lines <sup>a</sup>	15	1	0	15
Submit performance test results (electronic submittal) <sup>a</sup>	15	1	0	15
Renewal of certification of compliance <sup>b</sup>	0	0.2	0	0
Biennial reporting <sup>c</sup>	15	0.33	0	5
Quality Assurance testing <sup>d</sup>	0	0.33	0	0
EPA compliance audit testing <sup>e</sup>	0	0.33	0	0
Review annual quality assurance audit report <sup>f,g</sup>	0	0	0	0
<i>Manufacturers - Existing Model Lines</i>				
Renewal of certification of compliance <sup>h</sup>	51	1	0	51
Biennial reporting <sup>i</sup>	51	2.48	0	127
Quality Assurance testing <sup>d</sup>	51	0.33	0	17
EPA compliance audit testing <sup>e</sup>	1	0.33	0	0.33
Review annual quality assurance audit report <sup>f,j</sup>	51	1	0	51
<i>Testing Laboratories</i>				
Application for test lab approval (new)	0	1	0	0
Biennial proficiency testing and report development <sup>k</sup>	8	0.5	0	4
Application for re-approval as a test lab <sup>l</sup>	8	0.2	0	1.6
<i>Third-Party Certifiers</i>				
Application for approval as a third-party certifier (new)	0	1	0	0
Application for re-approval as a third-party certifier <sup>l</sup>	8	0.2	0	1.6
Annual quality assurance plan audit <sup>f,m</sup>	8	6.4	0	51

			<b>Total <sup>n</sup></b>	<b>354</b>
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<sup>a</sup> We assume that 15 of the 51 existing manufacturers will each introduce and certify 1 new model line each year during the three-year period of this ICR.

<sup>b</sup> Manufacturers must request renewal of a model line's certificate of compliance every 5 years. For new model lines introduced during the three-year period of this ICR, no recertifications are necessary. 1 response/5 years = 0.2 responses/year.

<sup>c</sup> Each manufacturer of a certified wood heater model line must submit a report to the Administrator every 2 years following issuance of a certificate of compliance for each model line. The manufacturers of the 15 new model lines introduced and certified in year 1 of this ICR will submit a report in year 3, resulting in an average of 5 reports per year over the three-year period of this ICR.

<sup>d</sup> Manufacturers perform quality assurance testing as part of their quality assurance program. We assume that each manufacturer will have one model line tested during the three-year period of this ICR for quality assurance and submit a report. We assume only existing model lines will be tested. 1 test/3 years = 0.33 responses/year/manufacturer

<sup>e</sup> We assume EPA will request compliance audit testing of a single manufacturer's model line once during the three-year period of this ICR. We assume this test will be done on an existing model line. (1 test / 3 years = 0.33 responses/year)

<sup>f</sup> A third-party certifier performs a quality assurance audit on each model line each year. We assume that third-party certifiers perform the audits for all of a single manufacturer's model lines in one visit. Third-party certifiers then send the results of these audits to the manufacturer and EPA within 30 days. Manufacturers must report within 30 days to the third-party certifier and to the Administrator its corrective actions and responses to any deficiencies identified in the annual quality assurance program audit report.

<sup>g</sup> The reviews for the annual quality assurance audit reports for new model lines will be included with the reviews submitted by manufacturers for their existing model lines. We assume that reviews for all audit reports for all of a manufacturer's model lines are submitted in a single batch. Reports for new and existing model lines are submitted together. Audits for new model lines are accounted under existing model lines.

<sup>h</sup> Manufacturers must request renewal of a model line's certificate of compliance every 5 years. We assume that all 51 manufacturers will submit recertification requests each year.

<sup>i</sup> Each manufacturer of a certified wood heater model line must submit a report to the Administrator every 2 years following issuance of a certificate of compliance for each model line. We assume manufacturers will submit one report for half of their existing model lines each year (253 model lines / 51 manufacturers / 2 = 2.48 response per year per manufacturer).

<sup>j</sup> We assume that each manufacturer's model lines are audited in one visit by the third-party certifier. We assume that 10 percent of audit reports will identify deficiencies requiring a report. Manufacturers must review the QA audits and then report to the third-party certifier and to the Administrator their corrective actions and responses to any deficiencies identified in the audit report.

<sup>k</sup> Test labs are required to participate biennially in an independently operated proficiency testing program. (1 participation / 2 years = 0.5)

<sup>l</sup> Test Labs and Third-Party Certifiers must reapply for approval every five years. We assume all eight approved test labs and all eight approved third-party certifiers will reapply for approval when their current term of approval expires and that EPA will approve all of the requests.

<sup>m</sup> Manufacturers of model lines are required to contract with third-party certifiers to perform quality assurance audits on each model line at least annually to ensure that the manufacturer's quality assurance plan is being implemented. We assume that third-party certifiers perform the audits for all of a single manufacturer's model lines in one visit and submit the results of the audits in a single batch within 30 days to the manufacturers and to EPA. We assume the eight third-party certifiers will each submit 6.4 audit reports to EPA per year for a total of 51 audit reports (51 manufacturers/8 certifiers = 6.4 audit reports/certifier/year). One audit report is submitted to EPA for each manufacturer.

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

The number of Total Annual Responses is 354.

The total annual labor costs are \$520,000. Details regarding these estimates may be found at the end of this document 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 in Tables 1 and 2 at the end of this document, respectively, and summarized below.

### **(i) Respondent Tally**

The total annual labor hours are 4,380 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 12 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$657,000. 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 1,490 labor hours at a cost of \$75,000; 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 burden from the most-recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This is due to several considerations. First, the number of manufacturers and the number of certified woodstove model lines have both increased since the previous ICR. These two factors have contributed to an increase in respondents, labor burden, and in the number of responses. The growth rate for manufacturers entering this industry has slowed since the previous ICR, and no new respondents are expected during the three-year period of this ICR. The number of existing testing laboratories and third-



party certifiers has remained constant since the previous ICR. The capital/startup costs have decreased since the previous ICR, which occurred during a period when manufacturers were introducing approximately 30 new model lines each year to comply with Step 2 requirements. In this ICR, we expect the introduction of new model lines to be 15 per year. This results in a decrease in capital/startup costs for performance testing and new model certification. There is an increase in operation and maintenance (O&M) costs reflecting the increase in model lines that are tested as part of the manufacturers Quality Assurance Program. In this ICR, we have reorganized Table 1, Table 2, and the Total Annual Responses tables to separate requirements for new model lines from existing model lines. This ICR also reorganizes the Capital/Startup vs. Operation and Maintenance (O&M) Costs table to distinguish between initial costs for new models and operation and maintenance costs for existing models. Additionally, this ICR adjusts the labor assumptions for the burden associated with manufacturer review of QA annual audit reports provided by third-party certifiers to reflect that audits are anticipated to be performed for all of a single manufacturer's model lines in one visit and the results of the audits would be presented in a single batch or report for manufacturer review. Similarly, this ICR assumes that third-party certifiers will prepare the QA annual audit report on a manufacturer, rather than model line, basis. Finally, this ICR also adjusts the labor assumptions associated with recordkeeping requirements for manufacturers for test documentation and for retention of sealed stoves to reflect that the number of model lines per manufacturer and the frequency of the activity. These adjustments minimally reduce burden for these activities, however, there remains an overall increase in burden. There is a slight increase in labor costs, which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (March 2021) to calculate respondent burden costs.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 12 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-OAR-2021-0085. 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. Due to COVID-19 precautions, entry to the Reading Room is available by appointment only. Please contact personnel in the Reading Room to schedule an appointment. 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-OAR-2021-0085 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)**

Burden Item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical hours per year (E=CxD)	(F) Management hours per year (F=Ex0.05)	(G) Clerical person-hours per year (G=Ex0.1)	(H) Total Cost per year (\$) <sup>b</sup>
<b>Reporting Requirements</b>								
<i>Manufacturers - New Model Lines</i>								
1. Test notification for new model lines <sup>c</sup>	2	1	2	15	30	2	3	\$4,080.86
2. Application for certification for new model lines <sup>c</sup>	8	1	8	15	120	6	12	\$16,323.42
3. Submit performance test results <sup>c</sup>	2	1	2	15	30	2	3	\$4,080.86
4. Renewal of certification of compliance <sup>d</sup>	8	0.2	2	0	0	0	0	\$0.00
5. Biennial reporting <sup>e</sup>	2	0.33	1	15	10	0.5	1.0	\$1,346.68
6. Quality assurance testing <sup>f</sup>	8	0.33	2.7	0	0	0	0	\$0
7. EPA compliance audit testing <sup>g</sup>	8	0.33	2.7	0	0	0	0	\$0
8. Review annual QA audit report <sup>h</sup>	4	0	0	0	0	0	0	\$0
<i>Manufacturers - Existing Model Lines</i>								
1. Renewal of certification of compliance <sup>d</sup>	8	1	8	51	408	20.4	40.8	\$55,499.63
2. Biennial reporting <sup>i</sup>	2	2.48	5	51	253	12.7	25.3	\$34,415.21
3. Quality assurance testing <sup>f</sup>	8	0.33	2.7	51	136	6.8	13.6	\$18,499.88
4. EPA compliance audit testing <sup>g</sup>	8	0.33	2.7	1	2.7	0.1	0.3	\$362.74
5. Review annual QA audit report <sup>k</sup>	4	1	4.0	51	204	10.2	20.4	\$27,749.81
<i>Testing Laboratories</i>								
1. Application for test lab approval (new)								

a. Already has ISO accreditation	20	1	20	0	0	0	0	\$0
b. Needs to obtain ISO accreditation	80	1	80	0	0	0	0	\$0
2. Biennial proficiency testing and report development <sup>1</sup>	150	0.5	75	8	600	30	60	\$81,617.10
3. Application for re-approval as a test lab <sup>m</sup>	20	0.2	4	8	32	1.6	3.2	\$4,352.91
<i>Third-Party Certifiers</i>								
1. Application for approval as a third-party certifier (new)								
a. Already has ISO accreditation	20	1	20	0	0	0	0	\$0
b. Needs to obtain ISO accreditation	80	1	80	0	0	0	0	\$0
2. Application for re-approval as a third-party certifier <sup>m</sup>	20	0.2	4	8	32	1.6	3.2	\$4,352.91
3. Annual quality assurance audits <sup>j</sup>	20	6.4	128	8	1,020	51	102	\$138,749.07
<b>Subtotal for Reporting Requirements</b>						<b>3,309</b>		<b>\$391,431</b>
<b>Recordkeeping Requirements</b>								
<i>Manufacturers</i>								
1. Test documentation <sup>n</sup>	1	1.1	1.1	51	53.6	2.7	5.4	\$7,291.13
2. QA parameter inspections <sup>o</sup>	2	4	8	51	408	20.4	41	\$55,499.63
3. Retained (sealed) stoves <sup>p</sup>	1	1.8	2	51	89	4.5	8.9	\$12,151.88
<i>Test Laboratories</i>								
1. Certification test, proficiency test, and audit test results <sup>q</sup>	2	12	24	8	192	9.6	19	\$26,117.47
<i>Third-Party Certifier</i>								
1. Certification test, QA program inspection and audit tests <sup>r</sup>	2	12	24	8	192	9.6	19	\$26,117.47
<b>Subtotal for Recordkeeping Requirements</b>						<b>1,075</b>		<b>\$127,178</b>
<b>Total Labor Burden and Costs (rounded) <sup>s</sup></b>						<b>4,380</b>		<b>\$520,000</b>

<b>Total Capital and O&amp;M Cost (rounded) <sup>s</sup></b>								<b>\$657,000</b>
<b>GRAND TOTAL (rounded) <sup>s</sup></b>								<b>\$1,180,000</b>

**Assumptions:**

<sup>a</sup> There are fifty-one existing manufacturers of woodstoves. We assume no additional manufacturers will become subject to this regulation in the three-year period of this ICR. There are 253 existing model lines of woodstoves. We assume that existing manufacturers will introduce and certify a total of 10 new model lines each year during the three-year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$153.55 per hour for Managerial labor; \$122.20 per hour for Technical labor, and \$61.51 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, “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> We assume that 15 of the 51 existing manufacturers will each introduce and certify 1 new model line each year during the three-year period of this ICR. These 15 manufacturers introducing a new model line will notify EPA of the performance test, apply for certification, and submit performance test results.

<sup>d</sup> Manufacturers must request renewal of a model line's certificate of compliance every 5 years. For new model lines introduced during the three-year period of this ICR, no recertifications are necessary. We assume that all 51 manufacturers with certified model lines will submit recertification requests each year.

<sup>e</sup> Each manufacturer of a certified wood heater model line must submit a report to the Administrator every 2 years following issuance of a certificate of compliance for each model line. The manufacturers of the 15 new model lines introduced and certified in year 1 of this ICR will submit a report in year 3, resulting in an average of 0.33 responses/year/manufacturer.

<sup>f</sup> Manufacturers perform quality assurance testing as part of their quality assurance program. We assume that each manufacturer will have one model line tested during the three-year period of this ICR for quality assurance and submit a report. We assume only existing model lines will be tested.  $1 \text{ test} / 3 \text{ years} = 0.33 \text{ responses/year/manufacturer}$

<sup>g</sup> We assume EPA will request compliance audit testing of a single manufacturer's model line once during the three-year period of this ICR. We assume this test will be done on an existing model line.  $(1 \text{ test} / 3 \text{ years} = 0.33 \text{ responses/year})$

<sup>h</sup> Third-party certifiers perform the audits for all of a single manufacturer's model lines in one visit and submit the results of the audits in a single batch within 30 days to the manufacturers and to EPA. Manufacturers must review the QA audits and then report to the third-party certifier and to the Administrator their corrective actions and responses to any deficiencies identified in the audit report. The reviews of audits for both new and existing models are accounted for on the line item for existing models.

<sup>i</sup> Each manufacturer of a certified wood heater model line must submit a report to the Administrator every 2 years following issuance of a certificate of compliance for each model line. We assume manufacturers will submit one report for half of their existing model lines each year  $(253 \text{ model lines} / 51 \text{ manufacturers} / 2 = 2.48 \text{ response per year per manufacturer})$ .

<sup>j</sup> Manufacturers of model lines are required to contract with third-party certifiers to perform quality assurance audits on each model line at least annually to ensure that the manufacturer's quality assurance plan is being implemented. We assume all of a manufacturer's model lines will be audited in a single visit.  $51 \text{ manufacturers} / 8 \text{ third party certifiers} = 6.4 \text{ occurrences per certifier per year}$ . We assume each audit takes 20 hours of the third-party certifier's time.

<sup>k</sup> Third-party certifiers perform the audits for all of a single manufacturer's model lines in one visit and submit the results of the audits in a single batch within 30 days to the manufacturers and to EPA. Manufacturers must review the QA audits and then report to the third-party certifier and to the Administrator their corrective actions and responses to any deficiencies identified in the audit report. 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).

<sup>l</sup> Test labs are required to participate biennially in an independently operated proficiency testing program. There are eight approved test labs. (1 occurrence / 2 years = 0.5)

<sup>m</sup> Test Labs and Third-Party Certifiers must reapply for approval every five years. We assume all eight approved test labs and all eight approved third-party certifiers will reapply for approval when their current term of approval expires. We assume that EPA will approve all of the requests. 1 reapproval /5 years = 0.2 reapprovals/year

<sup>n</sup> Manufacturers that hold a certificate of compliance for a woodstove model line are required to retain all records of the certification test for five years. We assume that manufacturers will spend one hour per certification test (for 253 existing + 15 new models) to keep the required records. 268 models/51 manufacturers/5 years = 1.1 occurrences/year

<sup>o</sup> Manufacturers that hold a certificate of compliance for a woodstove model line are required to retain all records of the quarterly parameter inspections for five years. Parameter inspections are part of the existing safety inspection program. We have assumed each of the 51 wood stove manufacturers with certified models will spend an additional 2 hours per quarter to document results.

<sup>p</sup> Each manufacturer must retain each wood heater upon which certification tests were performed based upon which certification was granted under §60.533(c) or (f) at the manufacturer's facility for a minimum of 5 years after the certification test. We assume that one stove is sealed and retained for each certification test (for 253 + 15 = 268 model lines) required of the 51 manufacturers over the three-year ICR period.

<sup>q</sup> Each approved test laboratory must maintain records consisting of all documentation pertaining to each certification test, quality assurance program inspection and audit test. We expect the required recordkeeping to be highly automated and have assumed that test laboratories will spend 2 hours per month to maintain records.

<sup>r</sup> Each approved third-party certifier must maintain records consisting of all documentation pertaining to each certification test, quality assurance program inspection and audit test. 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.

<sup>s</sup> 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)**

<b>Burden Activity</b>	<b>(A) EPA person- hours per occurrence</b>	<b>(B) No. of occurrences per year</b>	<b>(C) EPA person- hours per year (C=AxB)</b>	<b>(D) Respondents per year <sup>a</sup></b>	<b>(E) Technical person- hours per year (E=CxD)</b>	<b>(F) Management person-hours per year (F=Ex0.05)</b>	<b>(G) Clerical person- hours per year (G=Ex0.1)</b>	<b>(H) Total Cost per year (\$)<sup>b</sup></b>
<i>Manufacturers - New Model Lines</i>								
1. Certification test notification <sup>c</sup>	1	1	0.5	15	8	0.4	0.8	\$430.91
2. Attend certification test <sup>d</sup>	20	1	20	1	15	1	2	\$861.83
3. Review performance test report and application for certification <sup>c</sup>	8	1	8	15	120	6	12	\$6,894.60
4. Biennial reporting <sup>e</sup>	1	0.33	0	15	5	0.2	0.5	\$284.40
5. Review quality assurance testing <sup>f</sup>	8	0.33	3	0	0	0	0	\$0
6. EPA compliance audit testing <sup>g</sup>	40	0.33	13.3	0	0	0	0	\$0
8. Review annual QA audit report <sup>h</sup>	2	0	0	0	0	0	0	\$0
<i>Manufacturers - Existing Model Lines</i>								
1. Review application for re-certification <sup>i</sup>	8	1	8	51	408	20.4	40.8	\$23,441.64
2. Biennial reporting for certified models <sup>j</sup>	1	2	2.5	51	126.5	6.3	12.7	\$7,268.06
3. Review quality assurance testing <sup>f</sup>	2	0.33	0.7	51	34	1.7	3.4	\$1,953.47
4. EPA Compliance Audit testing <sup>g</sup>	40	0.33	13.3	1	13.3	0.7	1.3	\$766.07
5. Review annual QA audit report <sup>l</sup>	2	1	2.0	51	102.0	5.1	10.2	\$5,860.41
<i>Testing Laboratories and Third-Party Certifiers</i>								
1. Review and approval of test lab	4	0.2	1	8	6	0	1	\$368

credentials <sup>m</sup>								
2. Review test lab biennial proficiency test reports <sup>n</sup>	10	0.50	5	8	40	2	4	\$2,298.20
3. Review and approval of third-party certifier credentials <sup>m</sup>	8	0.2	1.6	8	13	1	1	\$735
4. Review annual quality assurance audits <sup>k</sup>	8	6.4	51.0	8	408	20.4	40.8	\$23,441.64
<b>TOTAL (rounded) <sup>o</sup></b>						<b>1,490</b>		<b>\$75,000</b>

**Assumptions:**

<sup>a</sup> There are fifty-one existing manufacturers of woodstoves. We assume no additional manufacturers will become subject to this regulation in the three-year period of this ICR. There are 253 existing model lines of woodstoves. We assume that existing manufacturers will introduce and certify a total of 15 new model lines each year during 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 \$69.04 (GS-13, Step 5, \$43.15 + 60%), Technical rate of \$51.23 (GS-12, Step 1, \$32.03 + 60%), and Clerical rate of \$27.73 (GS-6, Step 3, \$17.33 + 60%). These rates are from the Office of Personnel Management (OPM) “2021 General Schedule” which excludes locality rates of pay.

<sup>c</sup> We assume 15 manufacturers will introduce a new model line each year during the three-year period of this ICR. EPA will review: the test notification, the application for certification, and the performance test report.

<sup>d</sup> We assume that EPA will observe 5 percent of certification/performance tests conducted during the three-year period of this ICR (15 x 0.05 = 0.75 or 1 (rounded)).

<sup>e</sup> Each manufacturer of a certified wood heater model line must submit a report to the Administrator every 2 years following issuance of a certificate of compliance for each model line. The manufacturers of the 15 new model lines introduced and certified in year 1 of this ICR will submit a report in year 3, resulting in an average of 0.33 responses/year/manufacturer.

<sup>f</sup> We assume that manufacturers perform quality assurance testing as part of their quality assurance program will test one model line during the three-year period of this ICR and submit a report. We assume only existing model lines will be tested.

<sup>g</sup> We assume EPA will request compliance audit testing of one model line of an existing manufacturer's once during the three-year period of this ICR.

<sup>h</sup> We assume that EPA will take 2 hours to review the reports submitted by manufacturers showing the corrective actions and responses to any deficiencies identified in the audit report. We assume all of a manufacturer's model lines will be audited in a single visit. The audits for both new and existing models are accounted for on the line item for existing models.

<sup>i</sup> We assume that EPA will review and approve all re-certification applications for previously certified model lines. New model lines will not require recertification during the three-year period of this ICR. We assume that all 51 manufacturers with certified model lines will submit recertification requests each year.

<sup>j</sup> Each manufacturer of a certified wood heater model line must submit a report to the Administrator every 2 years following issuance of a certificate of compliance for each model line. We assume manufacturers will submit one report for half of their existing model lines each year, resulting in 1 response per year per manufacturer. We assume that EPA will take one hour to review the biennial reports.



<sup>k</sup> We assume that EPA will take 2 hours to review the annual quality assurance audits submitted by third-party certifiers. We assume that third-party certifiers will audit all of a manufacturer's model lines in a single visit and submit all audits in a single report. 51 manufacturers/8 third party certifiers = 6.4 occurrences per certifier per year. We assume each audit takes 20 hours of the third-party certifier's time.

<sup>l</sup> We assume that EPA will take 2 hours to review the reports submitted by manufacturers showing the corrective actions and responses to any deficiencies identified in the audit report. Each model line is audited each year. Manufacturers must review the QA audits and then report to the third-party certifier and to the Administrator their corrective actions and responses to any deficiencies identified in the audit report.

<sup>m</sup> Test Labs and Third-Party Certifiers reapply for approval every five years. We assume all eight approved test labs and all eight approved third-party certifiers will reapply for approval when their current term of approval expires. We assume that EPA will approve all of the requests.

<sup>n</sup> We assume that each of the 8 test laboratories will conduct two biennial proficiency tests and prepare two reports during the three-year ICR period.

<sup>o</sup> Totals have been rounded to three significant values. Figures may not add exactly due to rounding.