

Table 1: Annual Respondent Burden and Cost - NSPS for New Residential Wood Heat

Burden Item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent (C=AxB)
Reporting Requirements			
<i>Manufacturers - New Model Lines</i>			
1. Test notification for new model lines ^c	2	1	2
2. Application for certification for new model lines ^c	8	1	8
3. Submit performance test results ^c	2	1	2
4. Renewal of certification of compliance ^d	8	0.2	2
5. Biennial reporting ^e	2	0.33	1
6. Quality assurance testing ^f	8	0.33	2.7
7. EPA compliance audit testing ^g	8	0.33	2.7
8. Review annual QA audit report ^h	4	0	0
<i>Manufacturers - Existing Model Lines</i>			
1. Renewal of certification of compliance ^d	8	1	8
2. Biennial reporting ⁱ	2	2.48	5
3. Quality assurance testing ^f	8	0.33	2.7
4. EPA compliance audit testing ^g	8	0.33	2.7
5. Review annual QA audit report ^k	4	1	4.0
<i>Testing Laboratories</i>			
1. Application for test lab approval (new)			
a. Already has ISO accreditation	20	1	20
b. Needs to obtain ISO accreditation	80	1	80
2. Biennial proficiency testing and report development ^l	150	0.5	75
3. Application for re-approval as a test lab ^m	20	0.2	4
<i>Third-Party Certifiers</i>			
1. Application for approval as a third-party certifier (new)			
a. Already has ISO accreditation	20	1	20
b. Needs to obtain ISO accreditation	80	1	80
2. Application for re-approval as a third-party certifier ^m	20	0.2	4
3. Annual quality assurance audits ^j	20	6.4	128
Subtotal for Reporting Requirements			
Recordkeeping Requirements			
<i>Manufacturers</i>			
1. Test documentation ⁿ	1	1.1	1.1
2. QA parameter inspections ^o	2	4	8
3. Retained (sealed) stoves ^p	1	1.8	2
<i>Test Laboratories</i>			
1. Certification test, proficiency test, and audit test results ^q	2	12	24
<i>Third-Party Certifier</i>			

1. Certification test, QA program inspection and audit tests ^r	2	12	24
Subtotal for Recordkeeping Requirements			
Total Labor Burden and Costs (rounded)^s			
Total Capital and O&M Cost (rounded)^s			
GRAND TOTAL (rounded)^s			

Assumptions:

^a There are fifty-one existing manufacturers of woodstoves. We assume no additional manufacturers will be added to existing model lines of woodstoves. We assume that existing manufacturers will introduce and certify a total of 15 new model lines.

^b This ICR uses the following labor rates: \$153.55 per hour for Managerial labor; \$122.20 per hour for Technicians. The rates are based on the Bureau of Labor Statistics, Bureau of Economic Analysis, March 2021, "Table 2. Civilian Workers, by Occupational Group, by State, by Sex, by Race and Hispanic or Latino Ethnicity." The rates have been increased by 110% to account for the benefit packages available to those employed by private companies.

^c We assume that 15 of the 51 existing manufacturers will each introduce and certify 1 new model line each year. Each manufacturer of a new model line will notify EPA of the performance test, apply for certification, and submit performance test results.

^d Manufacturers must request renewal of a model line's certificate of compliance every 5 years. For new model lines, a certificate of compliance is required. We assume that all 51 manufacturers with certified model lines will submit recertification requests every 5 years.

^e Each manufacturer of a certified wood heater model line must submit a report to the Administrator every 2 years. Manufacturers of the 15 new model lines introduced and certified in year 1 of this ICR will submit a report in year 2.

^f Manufacturers perform quality assurance testing as part of their quality assurance program. We assume that each manufacturer of a certified wood heater model line will perform quality assurance testing every 3 years. We assume only existing model lines will be tested. 1 test/3 years = 0.33 responses/year.

^g We assume EPA will request compliance audit testing of a single manufacturer's model line once during the life of the model line. (1 test / 3 years = 0.33 responses/year)

^h Third-party certifiers perform the audits for all of a single manufacturer's model lines in one visit and submit the audit report to EPA. Manufacturers must review the QA audits and then report to the third-party certifier and to the Administrator. The reviews of audits for both new and existing models are accounted for on the line item for existing model lines.

ⁱ Each manufacturer of a certified wood heater model line must submit a report to the Administrator every 2 years. We assume manufacturers will submit one report for half of their existing model lines each year (253 model lines / 2 = 126.5 reports/year).

^j Manufacturers of model lines are required to contract with third-party certifiers to perform quality assurance testing. A quality assurance plan is being implemented. We assume all of a manufacturer's model lines will be audited in one visit per year. We assume each audit takes 20 hours of the third-party certifier's time.

^k Third-party certifiers perform the audits for all of a single manufacturer's model lines in one visit and submit the audit report to EPA. Manufacturers must review the QA audits and then report to the third-party certifier and to the Administrator. It is assumed that the third-party certifier will audit multiple manufacturer models when they conduct their associated audits.

^l Test labs are required to participate biennially in an independently operated proficiency testing program. The program is required to be approved by the Administrator.

^m Test Labs and Third-Party Certifiers must reapply for approval every five years. We assume all eight certifiers will be approved when their current term of approval expires. We assume that EPA will approve all of the requests. 1 reapproval every 5 years = 0.2 responses/year.

ⁿ Manufacturers that hold a certificate of compliance for a woodstove model line are required to retain all records for 5 years. We assume manufacturers will spend one hour per certification test (for 253 existing + 15 new models) to keep the required records. 268 model lines x 1 hour = 268 hours.

^o Manufacturers that hold a certificate of compliance for a woodstove model line are required to retain all records that are part of the existing safety inspection program. We have assumed each of the 51 wood stove manufacturers retains all records.

^p Each manufacturer must retain each wood heater upon which certification tests were performed based upon a test facility for a minimum of 5 years after the certification test. We assume that one stove is sealed and retained for each manufacturer over the three-year ICR period.

^q Each approved test laboratory must maintain records consisting of all documentation pertaining to each certification. We assumed required recordkeeping to be highly automated and have assumed that test laboratories will spend 2 hours per certification.

^r Each approved third-party certifier must maintain records consisting of all documentation pertaining to each certification. We assumed the required recordkeeping to be highly automated and have assumed that third-party certifiers will spend 2 hours per certification.

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

ers (40 CFR Part 60, Subpart AAA) (Renewal)

(D) Respondents per year ^a	(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 (\$) ^b
15	30	2	3	\$4,080.86
15	120	6	12	\$16,323.42
15	30	2	3	\$4,080.86
0	0	0	0	\$0.00
15	10	0.5	1.0	\$1,346.68
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
51	408	20.4	40.8	\$55,499.63
51	253	12.7	25.3	\$34,415.21
51	136	6.8	13.6	\$18,499.88
1	2.7	0.1	0.3	\$362.74
51	204	10.2	20.4	\$27,749.81
0	0	0	0	\$0
0	0	0	0	\$0
8	600	30	60	\$81,617.10
8	32	1.6	3.2	\$4,352.91
0	0	0	0	\$0
0	0	0	0	\$0
8	32	1.6	3.2	\$4,352.91
8	1,020	51	102	\$138,749.07
		3,309		\$391,431
51	53.6	2.7	5.4	\$7,291.13
51	408	20.4	41	\$55,499.63
51	89	4.5	8.9	\$12,151.88
8	192	9.6	19	\$26,117.47

Labor R
Management
Technical
Clerical

8	192	9.6	19	\$26,117.47
	1,075			\$127,178
	4,380			\$520,000
				\$657,000
				\$1,180,000

Some subject to this regulation in the three-year period of this ICR. There are 253 of 10 new model lines each year during the three-year period of this ICR.

ical labor, and \$61.51 per hour for Clerical labor. These rates are from the United onal and Industry group.” The rates are from column 1, “Total Compensation.” vate industry.

var during the three-year period of this ICR. These 15 manufacturers introducing a esults.

el lines introduced during the three-year period of this ICR, no recertifications are each year.

ears following issuance of a certificate of compliance for each model line. The year 3, resulting in an average of 0.33 responses/year/manufacturer.

ach manufacturer will have one model line tested during the three-year period of 3 years = 0.33 responses/year/manufacturer

three-year period of this ICR. We assume this test will be done on an existing

the results of the audits in a single batch within 30 days to the manufacturers and istrator their corrective actions and responses to any deficiencies identified in the sting models.

ears following issuance of a certificate of compliance for each model line. We / 51 manufacturers / 2 = 2.48 response per year per manufacturer).

audits on each model line at least annually to ensure that the manufacturer's a single visit. 51 manufacturers/8 third party certifiers = 6.4 occurrences per

the results of the audits in a single batch within 30 days to the manufacturers and istrator their corrective actions and responses to any deficiencies identified in the duct their audits (thereby reducing the time needed to audit manufacturers and

ere are eight approved test labs. (1 occurrence / 2 years = 0.5)

red test labs and all eight approved third-party certifiers will reapply for approval l / 5 years = 0.2 reapprovals/year

ords of the certification test for five years. We assume that manufacturers will els/51 manufacturers/5 years = 1.1 occurrences/year

ords of the quarterly parameter inspections for five years. Parameter inspections with certified models will spend an additional 2 hours per quarter to document

which certification was granted under §60.533(c) or (f) at the manufacturer's or each certification test (for $253 + 15 = 268$ model lines) required of the 51

fication test, quality assurance program inspection and audit test. We expect the month to maintain records.

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ates
\$153.55
\$122.20
\$61.51

hr/response

Table 2: Average Annual EPA Burden and Cost - NSPS for New Residential Wood Heaters

Burden Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per year	(C) EPA person-hours per year (C=AxB)
<i>Manufacturers - New Model Lines</i>			
1. Certification test notification ^c	1	1	0.5
2. Attend certification test ^d	20	1	20
3. Review performance test report and application for certification ^c	8	1	8
4. Biennial reporting ^e	1	0.33	0
5. Review quality assurance testing ^f	8	0.33	3
6. EPA compliance audit testing ^g	40	0.33	13.3
8. Review annual QA audit report ^h	2	0	0
<i>Manufacturers - Existing Model Lines</i>			
1. Review application for re-certification ⁱ	8	1	8
2. Biennial reporting for certified models ^j	1	2	2.5
3. Review quality assurance testing ^f	2	0.33	0.7
4. EPA Compliance Audit testing ^g	40	0.33	13.3
5. Review annual QA audit report ^l	2	1	2.0
<i>Testing Laboratories and Third-Party Certifiers</i>			
1. Review and approval of test lab credentials ^m	4	0.2	1
2. Review test lab biennial proficiency test reports ⁿ	10	0.50	5
3. Review and approval of third-party certifier credentials ^m	8	0.2	1.6
4. Review annual quality assurance audits ^k	8	6.4	51.0
TOTAL (rounded) ^o			

Assumptions:

^a There are fifty-one existing manufacturers of woodstoves. We assume no additional manufacturers will become manufacturers of woodstoves. We assume that existing manufacturers will introduce and certify a total of 15 new model lines of woodstoves.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for (1.6 x 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%) from the "General Schedule" which excludes locality rates of pay.

^c We assume 15 manufacturers will introduce a new model line each year during the three-year period of this ICR. Each manufacturer will submit a performance test report.

^d We assume that EPA will observe 5 percent of certification/performance tests conducted during the three-year period.

^e Each manufacturer of a certified wood heater model line must submit a report to the Administrator every 2 years. Manufacturers of the 15 new model lines introduced and certified in year 1 of this ICR will submit a report in year 1.

^f We assume that manufacturers perform quality assurance testing as part of their quality assurance program with the assumption that only existing model lines will be tested.

^g We assume EPA will request compliance audit testing of one model line of an existing manufacturer's once during the audit process.

^h We assume that EPA will take 2 hours to review the reports submitted by manufacturers showing the corrective actions taken. The audits for both new and existing models are conducted in a single visit.

ⁱ We assume that EPA will review and approve all re-certification applications for previously certified model lines. We assume that all 51 manufacturers with certified model lines will submit recertification requests each year.

^j Each manufacturer of a certified wood heater model line must submit a report to the Administrator every 2 years. Manufacturers will submit one report for half of their existing model lines each year, resulting in 1 response per manufacturer.

^k We assume that EPA will take 2 hours to review the annual quality assurance audits submitted by third-party certifiers in a single visit and submit all audits in a single report. $51 \text{ manufacturers} / 8 \text{ third party certifiers} = 6.4 \text{ occurrences per certifier's time}$.

^l We assume that EPA will take 2 hours to review the reports submitted by manufacturers showing the corrective actions taken. Manufacturers must review the QA audits and then report to the third-party certifier and to the audit report.

^m Test Labs and Third-Party Certifiers reapply for approval every five years. We assume all eight approved test laboratories will reapply when their current term of approval expires. We assume that EPA will approve all of the requests.

ⁿ We assume that each of the 8 test laboratories will conduct two biennial proficiency tests and prepare two reports per year.

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

Manufacturers (40 CFR Part 60, Subpart AAA) (Renewal)

(D) Respondents per year ^a	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (F=Ex0.05)	(G) Clerical person- hours per year (G=Ex0.1)	(H) Total Cost per year (\$) ^b
15	8	0.4	0.8	\$430.91
1	15	1	2	\$861.83
15	120	6	12	\$6,894.60
15	5	0.2	0.5	\$284.40
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
51	408	20.4	40.8	\$23,441.64
51	126.5	6.3	12.7	\$7,268.06
51	34	1.7	3.4	\$1,953.47
1	13.3	0.7	1.3	\$766.07
51	102.0	5.1	10.2	\$5,860.41
8	6	0	1	\$368
8	40	2	4	\$2,298.20
8	13	1	1	\$735
8	408	20.4	40.8	\$23,441.64
		1,490		\$75,000

Manufacturers subject to this regulation in the three-year period of this ICR. There are 253 existing model lines each year during the three-year period of this ICR.

Amount for government overhead expenses: Managerial rate of \$69.04 (GS-13, Step 5, \$43.15 x 1.60 = \$69.04 + 60%). These rates are from the Office of Personnel Management (OPM) "2021

ICR. EPA will review: the test notification, the application for certification, and the

three-year period of this ICR (15 x 0.05 = 0.75 or 1 (rounded)).

Manufacturers following issuance of a certificate of compliance for each model line. The average is 0.33 responses/year/manufacturer.

ll test one model line during the three-year period of this ICR and submit a report. We

uring the three-year period of this ICR.

ve actions and responses to any deficiencies identified in the audit report. We assume all e accounted for on the line item for existing models.

nes. New model lines will not require recertification during the three-year period of this ear.

ars following issuance of a certificate of compliance for each model line. We assume ' year per manufacturer. We assume that EPA will take one hour to review the biennial

certifiers. We assume that third-party certifiers will audit all of a manufacturer's model rances per certifier per year. We assume each audit takes 20 hours of the third-party

ve actions and responses to any deficiencies identified in the audit report. Each model line the Administrator their corrective actions and responses to any deficiencies identified in

: labs and all eight approved third-party certifiers will reapply for approval when their

orts during the three-year ICR period.

Labor Rates	
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Management	\$69.04
Technical	\$51.23
Clerical	\$27.73

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

(A) Data Collection Device	(B) Capital/Start-Up for One Respondent/ Model Line	(C) Number of New Respondents/Model Line	(D) Total Capital/Start-Up Cost (B X C)
Certification Test ^a	\$16,750	15	\$251,250
Cost of Permanent Label ^b	\$400	15	\$6,000
Prepare Quality Assurance Plan ^c	\$5,000	15	\$75,000
Owner's Manual ^d	\$2,250	15	\$33,750
Quality Assurance Testing ^e			
EPA Compliance Audit Test ^f			
ISO Accreditation-Test Laboratories ^g	\$75,000	0	\$0
ISO Accreditation-Third-Party Certifiers ^h	\$75,000	0	\$0
Totals ⁱ			\$366,000

^a Models certified by testing per manufacturer: We assume that manufacturers will test (at a cost of \$16,750 per test (includes or full safety testing (\$5,000), and shipping of prototype(s)(\$750) costs)) and apply to meet emission standards for 15 models

^b Total costs of permanent labels are estimated to be \$400 per model. We assume 15 new models per year will require perman

^c Manufacturers of new model lines are required to prepare a quality assurance plan for each new model line.

^d Manufacturers are required to prepare an Owner's Manual for each new model line. We assume an average fixed cost of \$2,2

^e We assume that each manufacturer will perform a performance test under their quality assurance program once during the th test.

^f We assume that EPA will select one wood heater model line for compliance audit testing during the three-year period of this one model assumes the cost of one appliance (based on the average cost of two models: 1 adjustable burn rate model (\$848 ea \$16,750 for the test (includes EPA testing (\$11,000), confirmation safety testing or full safety testing (\$5,000), and shipping c

^g We assume all eight test labs are already ISO accredited.

^h We assume all eight third-party certifiers are already ISO accredited.

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

sts

(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M (E X F)
\$16,750	17	\$284,750
\$17,815	0.33	\$5,938
		\$291,000

\$657,000

EPA testing (\$11,000), confirmation safety testing each year during the three-year ICR period.

ent labels during the three-year period of this ICR.

250 for preparation of an owner's manual.

ree-year period of this ICR at a cost of \$16,750 per

s ICR. Costs for EPA compliance audit testing of ch) and 1 pellet (\$1,281 each) stove model)) plus of prototype(s) (\$750) costs).

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

^a We assume that 15 of the 51 existing manufacturers will each introduce and certify 1 new model line each year durin

^b Manufacturers must request renewal of a model line's certificate of compliance every 5 years. For new model lines i recertifications are necessary. 1 response/5 years = 0.2 responses/year.

^c Each manufacturer of a certified wood heater model line must submit a report to the Administrator every 2 years foll line. The manufacturers of the 15 new model lines introduced and certified in year 1 of this ICR will submit a report i three-year period of this ICR.

^d Manufacturers perform quality assurance testing as part of their quality assurance program. We assume that each ma year period of this ICR for quality assurance and submit a report. We assume only existing model lines will be tested.

^e We assume EPA will request compliance audit testing of a single manufacturer's model line once during the three-ye existing model line. (1 test / 3 years = 0.33 responses/year)

f A third-party certifier performs a quality assurance audit on each model line each year. We assume that third-party certifiers perform audits on all model lines in one visit. Third-party certifiers then send the results of these audits to the manufacturer and EPA within 30 days. Manufacturers submit corrective actions and responses to any deficiencies identified in the audit reports to the third-party certifier and to the Administrator.

g The reviews for the annual quality assurance audit reports for new model lines will be included with the reviews submitted for 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. Report: Audits for new model lines are accounted under existing model lines.

h Manufacturers must request renewal of a model line's certificate of compliance every 5 years. We assume that all 51 manufacturers request renewal every 5 years.

i Each manufacturer of a certified wood heater model line must submit a report to the Administrator every 2 years following the audit. We assume manufacturers will submit one report for half of their existing model lines each year. (253 model lines/2 = 126.5 model lines per manufacturer)

j We assume that each manufacturer's model lines are audited in one visit by the third-party certifier. Manufacturers must submit corrective actions and responses to any deficiencies identified in the audit reports to the third-party certifier and to the Administrator.

k Test labs are required to participate biennially in an independently operated proficiency testing program. (1 participant per manufacturer)

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

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

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

Number of Respondents		
Year	Respondents That Submit Reports	
	(A) Number of New Respondents	(B) Number of Existing Respondents
1	0	51
2	0	51
3	0	51
Average	0	51
1	0	11
2	0	11
3	0	11
Average	0	11

a The EPA Certified Wood Heater Database indicates there are currently 51 woodstove manufacturers with 253 certified model lines in the period of this ICR. We assume existing manufacturers will apply for certification of a total of 15 new model lines each year.

^b The database of EPA-approved test labs and third-party certifiers (https://www.epa.gov/sites/production/files/2021-03/epa_approved_test_labs_and_third_party_certifiers.pdf) lists 3 approved test labs and 8 approved third-party certifiers for a total of eleven approved organizations. We assume that no new Test Lab or Third-Party Certifiers must reapply for approval every five years. We assume that all labs/certifiers will reapply and receive approval.

(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(B \times C)+D$
0	15
0	15
0	15
0	0
0	5
0	0
0	0
0	0
0	0
0	51
0	127
0	17
0	0.33
0	51
0	0
0	4
0	1.6
0	0
0	1.6
0	51
Total ⁿ	354

ing the three-year period of this ICR.

ntroduced during the three-year period of this ICR, no

lowing issuance of a certificate of compliance for each model
1 year 3, resulting in an average of 5 reports per year over the

manufacturer will have one model line tested during the three-
1 test/3 years = 0.33 responses/year/manufacturer

ear period of this ICR. We assume this test will be done on an

certifiers perform the audits for all of a single manufacturer's model lines every 30 days. Manufacturers must report within 30 days to the annual quality assurance program audit report.

submitted by manufacturers for their existing model lines. We assume that reports for new and existing model lines are submitted together.

1) All manufacturers will submit recertification requests each year.

2) Following issuance of a certificate of compliance for each model line, 51 manufacturers / 2 = 2.48 response per year per manufacturer.

3) Manufacturers must review the QA audits and then report to the third-party certifier.

4) (1 response / 2 years = 0.5)

5) All labs and all eight approved third-party certifiers will reapply for accreditation every 2 years.

6) On each model line at least annually to ensure that the certifier audits all of a single manufacturer's model lines in one visit and that all third-party certifiers will each submit 6.4 audit reports to EPA. 6.4 reports is submitted to EPA for each manufacturer.

Respondents		
Respondents That Do Not Submit Any Reports		
(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)
Woodstove Manufacturers ^a		
0	0	51
0	0	51
0	0	51
0	0	51
Test Labs / Third-Party Certifiers ^b		
0	0	11
0	0	11
0	0	11
0	0	11

7) We assume no new manufacturers will enter this industry and become respondents in the three-year period of this ICR.

04/documents/epa_approved_test_labs_and_third_party_certifiers_april_2021.pdf) shows there are 8 approved test labs and Third-Party Certifiers will apply for approval during the three-year period of this ICR. Test Labs and Third-party approval.