

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M)  
(Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal), EPA ICR Number 1415.13, OMB Control Number 2060-0234.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) were proposed on December 9, 1991; promulgated on September 22, 1993; and most-recently amended on November 19, 2020. These regulations apply to existing and new dry-cleaning facilities that use perchloroethylene (PCE). New facilities include those that commenced either construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart M.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or of any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. If there is no such delegated authority, the EPA's regional offices can review them. All other reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the EPA's regional offices. The use of the term "Designated Administrator" throughout this document refers either to the U.S. EPA or a delegated authority such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

The "Affected Public" are owners or operators of dry-cleaning facilities that use perchloroethylene (PCE). The "burden" to the "Affected Public" may be found below in Table 1a: Annual Respondent Burden and Cost – Annual Respondent Burden and Cost for Private Facilities - NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal). The "burden" to the Federal Government is attributed entirely to work performed by

either Federal employees or government contractors and may be found in: 1) Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal); and 2) Table 2: Average Annual EPA Burden and Cost – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal). A separate table breaks out the burden by affected sector and may be found below in Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal).

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

Over the next three years, approximately 28,020 respondents per year will be subject to these standards, of which 20 are major sources and the remainder (28,000) are area sources. We assume that all existing and new area source dry-cleaning facilities in the United States are privately-owned and operated by the dry-cleaning industry. Of the 28,000 area sources, 8,000 are located in states (California, Maine, New York, Rhode Island) that already require an enhanced LDAR program. Therefore, the monthly LDAR requirement of the NESHAP will affect 20,000 existing area sources. We estimate that 2,330 additional area sources per year will become subject to these same regulations in the next three years, but that the overall number of facilities will remain constant due to the retirement of older existing facilities. Thirteen of the 20 major source dry cleaning facilities in the United States are privately-owned and operated by the dry-cleaning industry. The other 7 major source dry-cleaning facilities are owned by the Federal government. No new major sources are expected over the next three years. None of these facilities are owned by either state, local or tribal agencies. We assume that they will all respond to EPA inquiries.

The Office of Management and Budget (OMB) approved the currently-active ICR with the following “Terms of Clearance”:

“Upon resubmission, the agency must update the burden estimates to accurately reflect the number of respondents in industry and verify that there are no reporting or recordkeeping requirements for States in 40 CFR part 63, subpart M. The agency must also ensure that burden is calculated for all of the requirements and that the requirements and burden tables are consistent throughout the supporting statement. The agency must provide screen shots of the electronic mode of collection that is used for this information collection. In addition, the agency must have a burden statement that aligns with the requirements under 5 CFR 1320.8(b)(3) and placement of the OMB control number for on-line submissions on the initial screen per 5 CFR 1320.3(f)(2).”

In renewing the currently approved ICR, the agency has reviewed the number of respondents in industry and updated the burden estimates accordingly. In this case, we did not identify any changes to the number of respondents in the currently approved ICR. There are no

reporting requirements for states. ‘Burden’ has been calculated for all requirements, which are reflected in the burden tables in the supporting statement. All electronic collection in this information collection is submitted through EPA's CEDRI or ERT, as discussed in section 4(b)(i) of this document. Additional Paperwork Reduction Act requirements for CEDRI and ERT, including the burden statement and OMB control number, are available at: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, PCE emissions from perchloroethylene dry cleaning facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart M.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in the standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

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

The notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of these regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

The required initial and occasional reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

The EPA is requiring that owners or operators of affected sources submit electronic copies of initial notifications required in 40 CFR 63.9(b) and notifications of changes in information required in 40 CFR 63.9(j) through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For the notifications required in 40 CFR 63.9(b) and 63.9(j), owners and operators are required to upload a PDF of the required notifications.

### **3. Non-duplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart M.

#### **3(a) Non-duplication**

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, 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 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* (87 FR 20847) on April 8, 2022. No comments were received on the burden published in the *Federal Register* for this renewal.

### **3(c) Consultations**

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 28,020 respondents will be subject to these 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 it was being developed and these standards have been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Halogenated Solvents Industry Alliance, at (703) 875-0683, and the Dry Cleaning and Laundry Institute, at (800) 638-2627.

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 EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. The EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to either the destruction or nonexistence of essential records.

### **3(f) Confidentiality**

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

### **3(g) Sensitive Questions**

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

## **4. The Respondents and the Information Requested**

### **4(a) Respondents/SIC Codes**

The respondents to the recordkeeping and reporting requirements are perchloroethylene dry-cleaning facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by these standards and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below:

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

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

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

In this ICR, all the data that are recorded or reported is required by the NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M).

A source must make the following reports:

<b>Notifications</b>	
Initial notifications	§63.324(a)
Initial report requirements	§63.324(a)
Notification of Compliance Status	§63.324(b), §63.324(f)
Exceedance of solvent consumption exemption level	§63.324(c)
Facility status change	§63.324(c)
Notification of changes in information (reclassification to area source status or to revert to major source status) (electronic submission)	§63.9(b), §63.9(j)

A source must keep the following records:

<b>Recordkeeping</b>	
Monthly enhanced LDAR	§63.322(o)
Solvent purchases per month and calculation of yearly PCE consumption	§63.324(d)
Weekly or biweekly inspections	§63.324(d)
Date of repairs or purchase orders for repairs	§63.324(d)
Monitoring of control equipment	§63.324(d)
Design specification and operating manual for dry cleaning systems and emission control device	§63.324(e)
All reports and notifications	§63.10(b)
Record of applicability	§63.10(b)(3)

### Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at

a plant site.

The rule was recently amended to include electronic reporting provisions on November 19, 2020. Respondents are also required to submit electronic copies of notifications and certain reports through EPA's CEDRI. The notification is an upload of their currently required notification in portable document format (PDF) file. For purposes of this ICR, it is assumed that there is no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

### (ii) Respondent Activities

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate control device and LDAR instruments.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

### 5(a) Agency Activities

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

<b>Agency Activities</b>
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

### **5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The initial and occasional reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. The EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

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

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

The majority of respondents are small entities (e.g., small businesses). According to the Federal Register Notice for the 2006 final rule (71 FR 42742), "... over 99 percent of commercial dry-cleaning firms are small." When developing the 2006 revisions, EPA took special steps to ensure that the burden imposed on small entities was reasonable. The EPA conducted several meetings with industry trade associations to discuss regulatory options and the corresponding recordkeeping and reporting. In addition, for the 1993 promulgated standards, an in-depth economic analysis (comparable to a Regulatory Flexibility Analysis) was conducted and documented in "Economic Impact of Regulatory Control in the Dry-Cleaning Industry," (EPA 45/3 91 021). Because of the large number of small businesses in this industry, the reporting requirements for the individual cleaning facilities are minimal. There are no quarterly, semiannual, or annual reporting requirements as there are with most regulated large industries. The burden is further minimized since costly monitoring equipment, such as a continuous monitor, is not required. To complete monthly enhanced LDAR, area source dry-cleaning

facilities may use a halogenated leak detector, instead of a more-costly PCE gas analyzer as required for major sources.

#### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal); and in Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal).

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

Tables 1a and 1b document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of ‘Burden’ under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

#### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 1,590,000 hours (Total Labor Hours from Tables 1a and 1b below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously-approved ICR, and any comments received.

#### **6(b) Estimating Respondent Costs**

##### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$157.61 (\$75.05 + 110%)
Technical	\$123.94 (\$59.02 + 110%)
Clerical	\$62.52 (\$29.77 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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 percent to account for varying industry wage rates and the additional overhead business costs of employing workers

beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

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

The type of industry costs associated with the information collection activities in the subject standards are both labor costs, which are addressed elsewhere in this ICR, and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to these regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

Major sources must use a PCE gas analyzer (photo ionization detector (PID), flame ionization detector, or infrared analyzer) to perform leak checks according to Method 21 on a monthly basis, while area sources may use a halogenated hydrocarbon leak detector (HHD), which is less expensive than the gas analyzer required for major sources. Capital/startup costs for new area sources include the purchase of the respective monitor. There are 2,330 new area sources and no new major sources are expected in the next three-year ICR period.

Annual O&M costs for the monitors apply to both new and existing sources because these costs are incurred each year. For the 8,000 area source facilities that are in those states that already require an enhanced LDAR program, this ICR does not estimate capital and annual O&M costs for the monitors. The annual costs for postage are applied to new sources and sources with exceedances that must submit reports. All other existing sources must only keep records and, as such, an annual photocopying charge is assessed for all those sources keeping records. These costs are summarized in the table presented below:

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs<sup>1</sup></b>						
(A) Continuous Monitoring 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 Respondents with O&M	(G) Total O&M, (E X F)
PID	\$3,300	0	\$0	\$95	20	\$1,900
HHD	\$250	2,330	\$582,500	\$14	20,000	\$280,000
Initial notification & compliance report	-	-	-	\$6.37	2,330	\$14,842
Report exceed consumption cutoff	-	-	-	\$6	117	\$702
Photocopying	-	-	-	\$2.40	28,020	\$67,248
Total <sup>2</sup>			\$583,000			\$365,000

<sup>1</sup>This table includes the capital and O&M costs for both the private and public sectors.

<sup>2</sup>Note: Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are \$583,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$365,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$948,000. These are the recordkeeping costs.

### **6(c) Estimating Agency Burden and Cost**

The only costs to the Agency are those costs associated with analysis of the reported information. 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 \$281,000.

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

Managerial	\$70.56 (GS-13, Step 5, \$44.10 + 60%)
Technical	\$52.37 (GS-12, Step 1, \$32.73 + 60%)
Clerical	\$28.34 (GS-6, Step 3, \$17.71 + 60%)

These rates are from the Office of Personnel Management (OPM), 2022 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 – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal).

### **6(d) Estimating the Respondent Universe and Total Burden and Costs**

Based on our research for this ICR, on average over the next three years, approximately 28,020 existing respondents will be subject to these standards. It is estimated that an additional 2,330 area sources per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 28,020 per year.

The number of respondents is calculated using the following table that addresses the three

years covered by this ICR:

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

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

<sup>2</sup> This table includes respondents from both the private and public sectors.

<sup>3</sup> We assume that the overall number of facilities will remain constant due to retirement of old existing facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 28,020.

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

<b>Total Annual Responses<sup>1</sup></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
Write Initial Notification Report	2,330	1	25,690	28,020
Compliance Method Report	1,631	1	0	1,631
Solvent Consumption Report	699	1	0	699
Report Exceed Consumption Cutoff	117	1	0	117
			Total	30,467

<sup>1</sup>This table includes the responses for both the private and public sectors.

The number of Total Annual Responses is 30,467.

The total annual labor costs are \$197,000,000. Details regarding these estimates may be found at the end of this document in 1) Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal); 2) Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal); and 3) Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal).

### **6(e) Bottom Line Burden Hours and Cost Tables**

The detailed bottom line burden hours and cost calculations for both the respondents and the Agency are shown in Tables 1a, 1b, 1c, and 2 at the end of this document, respectively, and summarized below.

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

The total annual labor hours are 1,590,000 hours. Details regarding these estimates may be found in: 1) Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal); 2) Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal); and 3) Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records. However, the burden for each worker category may vary depending on the task.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information, both Private sector and Federal, is estimated to average 52 hours per response.

The total annual capital/startup and O&M costs to the regulated entities (private and Federal) are \$948,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

#### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 5,490 labor hours at a cost of \$281,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M)

(Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

#### **6(f) Reasons for Change in Burden**

There is no change in burden from the most-recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Second, the growth rate for this industry is very low or non-existent, so there is no significant change in the overall burden. Since there are no changes in the regulatory requirements and there is no significant industry growth, there are also no changes in the capital/startup or operation and maintenance (O&M) costs. There is a slight increase in 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 (September 2021) and the Office of Personnel Management (OPM), 2022 General Schedule 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 52 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2022-0073. 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-2022-0073 and OMB Control Number 2060-0234 in any correspondence.

### **Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this information.

**Table 1a: NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal): Annual Respondent Burden and Cost for Private Facilities**

Burden Item	(A) Hours per occurrence	(B) Occurrences per respondent per year	(C) Hours per respondent per year (AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technical hours per year (Cx D)	(F) Management hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.10 )	(H) Total cost per year (\$) <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarization with the regulatory requirements <sup>c</sup>	1	1	1	28,013	0	28,013	0	\$4,414,989
B. Required activities	N/A							
C. Create Information	N/A							
D. Gather existing information								
Initial report information	2	1	2	2,330	4,660	233	466	\$643,425
Solvent consumption	1	1	1	2,330	2,330	116.5	233	\$321,712
Compliance method report <sup>d</sup>	1	1	1	1,631	1,631	81.55	163.1	\$225,199
E. Write Report								
Initial notification report	1	1	1	2,330	2,330	116.5	233	\$321,712
Compliance method report <sup>c,d</sup>	1	1	1	1,631	0	1,631	0	\$257,054
Solvent consumption report <sup>c,e</sup>	0.25	1	0.25	699	0	174.75	0	\$27,541
Report-exceed consumption cutoff <sup>c,f</sup>	1	1	1	117	0	117	0	\$18,361
<b>Subtotal for Reporting Requirements</b>						<b>42,529</b>		<b>\$6,229,993</b>
4. Recordkeeping Requirements								
A. Familiarization with the regulatory requirements	See 3A							
B. Plan activities <sup>g</sup>	1	1	1	2,330	2,330	0	0	\$288,785
C. Implement activities								

Burden Item	(A) Hours per occurrence	(B) Occurrences per respondent per year	(C) Hours per respondent per year (AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technical hours per year (Cx D)	(F) Management hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.10 )	(H) Total cost per year (\$) <sup>b</sup>
Above consumption cutoff: Weekly LDAR <sup>g, h, i</sup>	0.75	52	39	19,595	764,209	0	0	\$94,717,579
Below consumption cutoff: Bi-weekly LDAR <sup>g, i, j</sup>	0.75	26	19.5	8,398	163,759	0	0	\$20,296,624
Major: Monthly enhanced LDAR <sup>k, l</sup>	1	48	48	13	624	31.2	62.4	\$86,158
Major: Weekly Carbon adsorber monitoring <sup>l, m</sup>	0.25	208	52	13	676	33.8	67.6	\$93,338
Area: Monthly enhanced LDAR <sup>n, o</sup>	0.75	12	9	20,000	180,000	9,000	18,000	\$24,853,311
D. Develop record system								
Solvent consumption <sup>g</sup>	1	1	1	2,330	2,330	0	0	\$288,785
Enhanced LDAR <sup>g</sup>	1	1	1	2,330	2,330	0	0	\$288,785
Monitoring records <sup>d, g</sup>	1	1	1	1,631	1631	0	0	\$202,149
Carbon adsorber monitoring records <sup>p</sup>	1	1	1	0	0	0	0	\$0
E. Time to enter information								
Monthly records of solvent consumption <sup>q, r, s</sup>	0.25	12	3	28,013	84,039	9	0	\$10,417,380
Above consumption cutoff: Records of weekly inspections <sup>h, i, s</sup>	0.25	52	13	19,595	254,736	39	0	\$31,578,673
Below consumption cutoff: Records of bi-weekly inspections <sup>g, i, j</sup>	0.25	26	6.5	8,398	54,586	0	0	\$6,765,541
Major: Enhanced LDAR	See 4C							
Major: Carbon adsorber monitoring	See 4C							
Area: Enhanced LDAR	See 4C							
F. Time to Train personnel								
Leak detection <sup>t, u</sup>	1	2	2	2,330	4,660	4,660	0	\$1,312,009

Burden Item	(A) Hours per occurrence	(B) Occurrences per respondent per year	(C) Hours per respondent per year (AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technical hours per year (Cx D)	(F) Management hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.10 )	(H) Total cost per year (\$) <sup>b</sup>
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>1,547,814</b>		<b>\$191,189,118</b>
<b>Total Labor Burden and Cost (rounded)<sup>v</sup></b>						<b>1,590,000</b>		<b>\$197,000,000</b>
<b>Total Capital and O&amp;M Cost (rounded)<sup>v</sup></b>								<b>\$947,000</b>
<b>Grand TOTAL (rounded) <sup>v</sup></b>								<b>\$198,000,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that there are 28,000 existing area sources and that 2,330 sources will leave the industry and will be replaced by 2,330 new area sources per year over the next three years. We assume that all existing and new area sources are private sector facilities. There are 20 existing major sources and 13 of these sources are private sector facilities. We assume that that no additional major sources will be subject to the NESHAP over the three-year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$157.61 per hour for Executive, Administrative, and Managerial labor; \$123.94 per hour for Technical labor, and \$62.52 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

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

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

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

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

<sup>g</sup> This task requires only technical employee hours.

<sup>h</sup> Occurrences are based on weekly inspection, assuming 52 weeks per year.

<sup>i</sup> We have assumed that of 28,000 area source perchloroethylene dry cleaners, 19,600 (70 percent) will be above the per consumption cutoff, which will require that the cleaner conduct weekly leak detection and repair. The remaining 8,400 area source perchloroethylene dry cleaners will be below the consumption cutoff and are only required to conduct bi-weekly leak detection and repair.

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

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

<sup>l</sup> There are 13 existing private sector major sources subject to the NESHAP.

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

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

<sup>o</sup> Approximately 8,000 existing area sources are located in states that already require enhanced monitoring; therefore, 20,000 existing area sources are subject to the NESHAP's enhanced LDAR program.

<sup>p</sup> No new major sources are expected for the three-year period of this ICR; therefore, no burden is associated with the development of carbon adsorber monitoring record systems.

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

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

<sup>s</sup> This task is performed primarily by technical staff. Management hours are only for a limited number of major sources, and we assume only three major sources will require managerial review.

<sup>t</sup> Estimate includes hours for training one owner/operator and one employee.

<sup>u</sup> This task requires an equal amount of management and technical employee hours.

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

**Table 1b: NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal): Annual Respondent Burden and Cost for Federal Facilities**

Burden Item	(A) Hours per occurrence	(B) Occurrences per respondent per year	(C) Hours per respondent per year (AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical hours per year (Cx D)	(F) Management hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.10)	(H) Total cost per year (\$) <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarization with the regulatory requirements <sup>c</sup>	1	1	1	7	0	7	0	\$494
B. Required activities	N/A							
C. Create Information	N/A							
D. Gather existing information								
Initial report information	2	1	2	0	0	0	0	\$0
Solvent consumption	1	1	1	0	0	0	0	\$0
Compliance method report	1	1	1	0	0	0	0	\$0
E. Write Report								
Initial notification report	1	1	1	0	0	0	0	\$0
Compliance method report <sup>c</sup>	1	1	1	0	0	0	0	\$0
Solvent consumption report <sup>c</sup>	0.25	1	0.25	0	0	0	0	\$0
Report-exceed consumption cutoff <sup>c</sup>	1	1	1	0	0	0	0	\$0
<b>Subtotal for Reporting Requirements</b>						<b>7</b>		<b>\$494</b>
4. Recordkeeping Requirements								
A. Familiarization with the regulatory requirements	See 3A							
B. Plan activities	1	1	1	0	0	0	0	\$0
C. Implement activities								
Above consumption cutoff: Weekly	0.75	52	39	0	0	0	0	\$0

Burden Item	(A) Hours per occurrence	(B) Occurrences per respondent per year	(C) Hours per respondent per year (AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical hours per year (CxD)	(F) Managemen t hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.10)	(H) Total cost per year (\$) <sup>b</sup>
<b>LDAR</b>								
Below consumption cutoff: Bi-weekly LDAR	0.75	26	19.5	0	0	0	0	\$0
Major: Monthly enhanced LDAR <sup>d,e</sup>	1	48	48	7	336	17	34	\$19,734
Major: Weekly Carbon adsorber monitoring <sup>e,f</sup>	0.25	208	52	7	364	18	36	\$21,378
Area: Monthly enhanced LDAR	0.75	12	9	0	0	0	0	\$0
<b>D. Develop record system</b>								
Solvent consumption	1	1	1	0	0	0	0	\$0
Enhanced LDAR	1	1	1	0	0	0	0	\$0
Monitoring records	1	1	1	0	0	0	0	\$0
Carbon adsorber monitoring records <sup>g</sup>	1	1	1	0	0	0	0	\$0
<b>E. Time to enter information</b>								
Monthly records of solvent consumption <sup>h,i,j</sup>	0.25	12	3	7	21	9	0	\$1,735
Above consumption cutoff: Records of weekly inspections	0.25	52	13	0	0	0	0	\$0
Below consumption cutoff: Records of bi-weekly inspections	0.25	26	6.5	0	0	0	0	\$0
Major: Enhanced LDAR	See 4C							
Major: Carbon adsorber monitoring	See 4C							
Area: Enhanced LDAR	See 4C							
<b>F. Time to Train personnel</b>								
Leak detection	1	2	2	0	0	0	0	\$0
<b>G. Time for audits</b>	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>835</b>		<b>\$42,847</b>

Burden Item	(A) Hours per occurrence	(B) Occurrences per respondent per year	(C) Hours per respondent per year (AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical hours per year (CxD)	(F) Managemen t hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.10)	(H) Total cost per year (\$) <sup>b</sup>
<b>Total Labor Burden and Cost (rounded)<sup>k</sup></b>						<b>842</b>		<b>\$43,300</b>
<b>Total Capital and O&amp;M Cost (rounded)<sup>k</sup></b>								<b>\$680</b>
<b>Grand TOTAL (rounded)<sup>k</sup></b>								<b>\$44,000</b>

**Assumptions:**

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

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for the benefit packages available to government employees: Managerial rate of \$70.56 (GS-13, Step 5, \$44.10 + 60%), Technical rate of \$52.37 (GS-12, Step 1, \$32.73 + 60%), and Clerical rate of \$28.34 (GS-6, Step 3, \$17.71 + 60%). These rates are from the Office of Personnel Management (OPM) “2022 General Schedule” which excludes locality rates of pay.

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

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

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

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

<sup>g</sup> No new major sources are expected for the three-year period of this ICR; therefore, no burden is associated with the development of carbon adsorber monitoring record systems.

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

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

<sup>j</sup> This task is performed primarily by technical staff. Management hours are only for a limited number of major sources, and we assume only three major sources will require managerial review

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

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

Affected Sector	Number of Responses	Labor Hours			Labor Cost	Capital and O&M Cost
		Reporting	Recordkeeping	Total		
Private	7	42,529	1,547,814	1,590,343	\$197,000,000	\$947,000
Public (Federal)	30,460	7	835	842	\$43,300	\$680
Total	30,467	42,536	1,548,649	1,591,185	\$197,043,300	\$947,680
<b>Total (rounded)</b>				<b>1,590,000</b>	<b>\$197,000,000</b>	<b>\$948,000</b>

**Table 2:– NESHAP for Perchloroethylene Dry Cleaning Facilities (40 CFR Part 63, Subpart M) (Renewal): Average Annual EPA Burden and Cost**

Burden Item	(A) EPA Technical hours per occurrence	(B) Occurrences per year <sup>a</sup>	(C) Technical hours per year (A x B)	(D) Management hours per year (C x 0.05)	(E) Clerical hours per year (C x 0.10)	(F) Total cost per year (\$) <sup>b</sup>
1. Report review						
A. Initial notification report	1	2,330	2,330	116.5	233	\$136,839.97
B. Compliance method report <sup>c</sup>	1	1,631	1,631	81.55	163.1	\$95,787.98
C. Solvent consumption report <sup>d</sup>	1	699	699	34.95	69.9	\$41,051.99
D. Report-exceed consumption cutoff <sup>e</sup>	1	117	117	5.83	11.7	\$6,842.00
<b>TOTAL (rounded) <sup>f</sup></b>				<b>5,490</b>		<b>\$281,000</b>

**Assumptions:**

<sup>a</sup>. We have assumed that there are 28,000 existing area sources and that 2,330 sources will leave the industry and will be replaced by 2,330 new area sources per year over the next three years. There are 20 existing major sources and we assume that that no additional major sources will be subject to the NESHAP over the three-year period of this ICR.

<sup>b</sup>. This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for the benefit packages available to government employees: Managerial rate of \$70.56 (GS-13, Step 5, \$44.10 + 60%), Technical rate of \$52.37 (GS-12, Step 1, \$32.73 + 60%), and Clerical rate of \$28.34 (GS-6, Step 3, \$17.71 + 60%). These rates are from the Office of Personnel Management (OPM) “2022 General Schedule” which excludes locality rates of pay.

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

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

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

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