

ICR Summary Information

Hours per Response	52
Number of Respondents	28,020
Total Estimated Burden Hours	1,590,000
Total Estimated Costs	\$198,000,000
Annualized Capital O&M	\$948,000
Total Annual Responses	30,500
Form Number	Not Applicable

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

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

Subtotal for Recordkeeping Requirements			
Total Labor Burden and Cost (rounded) ^v			
Total Capital and O&M Cost (rounded) ^v			
Grand TOTAL (rounded) ^v			

Assumptions

- ^a We have assumed that there are 28,000 existing area sources and that 2,330 sources will leave the industry and will be replaced. All existing and new area sources are private sector facilities. There are 20 existing major sources and 13 of these sources are private sector major sources subject to the NESHAP over the three-year period of this ICR.
- ^b This ICR uses the following labor rates: \$157.61 per hour for Executive, Administrative, and Managerial labor; \$123.94 per hour for non-executive labor from the United States Department of Labor, Bureau of Labor Statistics, September 2021, "Table 2. Civilian Workers, by Occupation, by Compensation." The rates have been increased by 110% to account for varying industry wage rates and the additional overhead costs including business expenses associated with hiring, training, and equipping their employees.
- ^c This task requires management hours only.
- ^d We estimate that 1,631 (70 percent) of the 2,330 new facilities will be above the consumption cutoff and are required to perform leak detection and repairs.
- ^e We estimate that 699 (30 percent) of the 2,330 new facilities will be below the consumption cutoff (will consume less than 1 lb of PCE per month).
- ^f We estimate that 5 percent of new facilities each year will exceed the cutoff, thus requiring submission of the exceed-consumption report.
- ^g This task requires only technical employee hours.
- ^h Occurrences are based on weekly inspection, assuming 52 weeks per year.
- ⁱ We have assumed that of 28,000 area source perchloroethylene dry cleaners, 19,600 (70 percent) will be above the per consumption cutoff and are required to perform leak detection and repairs. The remaining 8,400 area source perchloroethylene dry cleaners will be below the consumption cutoff and are only required to perform leak detection.
- ^j We have assumed that facilities below consumption cutoff perform leak detection and repairs on a bi-weekly basis.
- ^k Major sources contain an average of four machines. This task requires 1 hour times 4 machines per major source.
- ^l There are 13 existing private sector major sources-subject to the NESHAP.
- ^m This task requires 0.25 hours times 4 machines per major source per week.
- ⁿ Area sources contain an average of one machine. This task requires 0.75 hours times 1 machine per area source.
- ^o Approximately 8,000 existing area sources are located in states that already require enhanced monitoring; therefore, 20,000 area sources are not included in the ICR.
- ^p No new major sources are expected for the three-year period of this ICR; therefore, no burden is associated with the development of new major sources.
- ^q Occurrences are based on twelve months rolling average of PCE consumption, determined once per month.
- ^r This is based on 28,000 area sources and 13 private sector major sources performing this task every year.
- ^s This task is performed primarily by technical staff. Management hours are only for a limited number of major sources, and only for a limited number of occurrences.
- ^t Estimate includes hours for training one owner/operator and one employee.
- ^u This task requires an equal amount of management and technical employee hours.
- ^v Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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

(D) Respondents per year ^a	(E) Technical hours per year (CxD)	(F) Management hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.10)	(H) Total cost per year (\$) ^b
28,013	0	28,013	0	\$4,414,989
2,330	4,660	233	466	\$643,425
2,330	2,330	116.5	233	\$321,712
1,631	1,631	81.55	163.1	\$225,199
2,330	2,330	116.5	233	\$321,712
1,631	0	1,631	0	\$257,054
699	0	174.75	0	\$27,541
117	0	117	0	\$18,361
	42,529			\$6,229,993
2,330	2,330	0	0	\$288,785
19,595	764,209	0	0	\$94,717,579
8,398	163,759	0	0	\$20,296,624
13	624	31.2	62.4	\$86,158
13	676	33.8	67.6	\$93,338
20,000	180,000	9,000	18,000	\$24,853,311
2,330	2,330	0	0	\$288,785
2,330	2,330	0	0	\$288,785
1,631	1631	0	0	\$202,149
0	0	0	0	\$0
28,013	84,039	9	0	\$10,417,380
19,595	254,736	39	0	\$31,578,673
8,398	54,586	0	0	\$6,765,541
2,330	4,660	4,660	0	\$1,312,009

Labor Rates:	
Management	\$157.61
Technical	\$123.94
Clerical	\$62.52

				1,547,814	\$191,189,118
				1,590,000	\$197,000,000
					\$947,000
					\$198,000,000

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

hour for Technical labor, and \$62.52 per hour for Clerical labor. These rates are operational and Industry group.” The rates are from column 1, “Total and business costs of employing workers beyond their wages and benefits,

form this task.

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

ption cutoff report.

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

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

ment of carbon adsorber monitoring record systems.

we assume only three major sources will require managerial review.

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

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

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

Assumptions

- ^a There are 7 existing major sources that are federal facilities and we assume that that no additional major sources will be subj
- ^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for the bene 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 (OPM) “2022 General Schedule” which excludes locality rates of pay.
- ^c This task requires management hours only.
- ^d Major sources contain an average of four machines. This task requires 1 hour times 4 machines per major source.
- ^e There are 7 existing public sector major sources-subject to the NESHAP.
- ^f This task requires 0.25 hours times 4 machines per major source per week.
- ^g No new major sources are expected for the three-year period of this ICR; therefore, no burden is associated with the develop
- ^h Occurrences are based on twelve months rolling average of PCE consumption, determined once per month.
- ⁱ This is based on 7 major sources performing this task every year.
- ^j This task is performed primarily by technical staff. Management hours are only for a limited number of major sources, and
- ^k Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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

(D) Respondents per year ^a	(E) Technical hours per year (CxD)	(F) Management hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.10)	(H) Total cost per year (\$) ^b
7	0	7	0	\$494
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
		7		\$494
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
7	336	17	34	\$19,734
7	364	18	36	\$21,378
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
7	21	9	0	\$1,735
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0

Labor Rates:	
Management	\$70.56
Technical	\$52.37
Clerical	\$28.34

	835			\$42,847
	842			\$43,300
				\$680
				\$44,000

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

enefit packages available to government employees: Managerial rate of \$70.56 (GS-
, \$17.71 + 60%). These rates are from the Office of Personnel Management

onment of carbon adsorber monitoring record systems.

we assume only three major sources will require managerial review.

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

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

IAP for Perchloroethylene Dry Cleaning

Total	Labor Cost	Capital and O&M Cost
1,590,343	\$197,000,000	\$947,000
842	\$43,300	\$680
1,591,185	\$197,043,300	\$947,680
1,590,000	\$197,000,000	\$948,000

52 hrs/response

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

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

Assumptions:

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

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for employees: Managerial rate of \$70.56 (GS-13, Step 5, \$44.10 + 60%), Technical rate of \$52.37 (GS-12, Step 1 Step 3, \$17.71 + 60%). These rates are from the Office of Personnel Management (OPM) “2022 General Schedule”.

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

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

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

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

γ **Cleaning Facilities (40 CFR Part 63,**

(D) Management hours per year (C x 0.05)	(E) Clerical hours per year (C x 0.10)	(F) Total cost per year (\$) ^b
116.5	233	\$136,839.97
81.55	163.1	\$95,787.98
34.95	69.9	\$41,051.99
5.83	11.7	\$6,842.00
5,490		\$281,000

Labor Rates:	
Management	\$70.56
Technical	\$52.37
Clerical	\$28.34

and will be replaced by 2,330 new area sources per year
sources will be subject to the NESHAP over the three-

amount for the benefit packages available to government
, \$32.73 + 60%), and Clerical rate of \$28.34 (GS-6,
schedule” which excludes locality rates of pay.

required to perform this task.

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

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

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

Total (rounded)

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

\$947,000

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

ce (O&M) Costs - Public Sector

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

Total (rounded) \$680

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

25,690

Total Annual Responses - Public Sector

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

30,467

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

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

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

Any Reports
(E)
Number of Respondents (E=A+B+C-D)
28,020
28,020
28,020
28,020