

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants
(40 CFR Part 63, Subpart T) (Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (Renewal), EPA ICR Number 1652.11, OMB Control Number 2060-0273.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants were proposed on November 29, 1993; promulgated on December 2, 1994; and most-recently amended on May 3, 2007. These regulations apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride; perchloroethylene; 1,1,1-trichloroethane; trichloroethylene; carbon tetrachloride; chloroform; or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. New facilities include those that commenced either construction or reconstruction on or after December 2, 1994. This information is being collected to assure compliance with 40 CFR Part 63, Subpart T.

In general, all NESHAP standards require initial notification reports, 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 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 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 regional offices. The use of the term "Designated Administrator" throughout this document refers 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 solvent cleaning machines using any solvent containing methylene chloride, perchloroethylene; 1,1,1-trichloroethane;

trichloroethylene; carbon tetrachloride; chloroform; or any combination of these halogenated solvents in a concentration greater than 5 percent by-weight. The “burden” to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (Renewal). The Federal Government’s “burden” is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (Renewal). There are approximately 931 solvent cleaning machine facilities. None of the facilities in the United States are owned by either state, local, or tribal entities or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

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).

The estimate includes 768 batch and in-line vapor machines and 163 cold-cleaning machines. No new respondents are expected to materialize.

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 T. 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, HAP emissions from solvent cleaning machines 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 T.

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.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with these standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the 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 these standards are being met. The performance test may also be observed.

The required quarterly and semiannual 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 CDX, using CEDRI. For the notifications required in 40 CFR 63.9(b) and 63.9(j), owners and operators are required to upload a portable document format (PDF) file 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 T.

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 931 respondents will be subject to these standards over the three-year period covered by this ICR. No new respondents are expected to emerge.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Chemistry Council, at (202) 249-7000, and the Precision Machined Products Association, at (440) 526-0300.

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 that 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 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 owners and operators of halogenated solvent cleaning machines. The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes for the respondents affected by these standards are listed below:

Standard (40 CFR Part 63, Subpart T)	SIC Codes	NAICS Codes
Furniture and Fixtures		
Household and institutional furniture and kitchen cabinet manufacturing	2514	3371
Office furniture (including fixtures) manufacturing	2522	3372
Other furniture related product manufacturing	2591	3379
Electronic and Other Electrical Equipment and Components, Except Computer Equipment		
Electric lighting equipment manufacturing	3648	3351
Household appliance manufacturing	3639	3352
Electrical equipment manufacturing	3699	3353
Other electrical equipment and component manufacturing	3699	3359
Transportation Equipment		
Motor vehicle manufacturing	3714	3361
Motor vehicle body and trailer manufacturing	3711	3362
Aerospace product and parts manufacturing	3721	3364

Standard (40 CFR Part 63, Subpart T)	SIC Codes	NAICS Codes
Ship and boat building	3731	3366
Railroad rolling stock manufacturing	3743	3365
Other miscellaneous manufacturing	3999	3399
Primary Metal Industries		
Iron and steel mills and ferroalloy manufacturing	3312	3311
Steel product manufacturing from purchased steel	3316	3312
Alumina and aluminum production and processing	3365	3313
Nonferrous metal (except aluminum) production and processing	3339	3314
Foundries	3325	3315
Fabricated Metal Manufacturing		
Fabricated Structural Metal Manufacturing	3441	3323
Plate Work Manufacturing	3443	3323
Metal Kitchen Cookware, Utensil, Cutlery, and Flatware (except Precious) Manufacturing	3421	3322
Prefabricated Metal Building and Component Manufacturing	3448	3323
Industrial and Commercial Machinery and Computer Equipment		
Agriculture, construction and mining machinery manufacturing	3531	3331
Industrial machinery manufacturing	3559	3332
Commercial and service industry machinery manufacturing	3589	3333
Ventilation, heating, air-conditioning, and commercial refrigeration equipment manufacturing	3564	3334
Metalworking machinery manufacturing	3545	3335
Engine, turbine, and power transmission equipment manufacturing	3511	3336
Other general purpose machinery manufacturing	3569	3339
Measuring, Analyzing, and Controlling Instruments; Photographic, Medical and Optical Goods; Watches and Clocks		
Navigational, measuring, electro-medical, and control instruments	3812	3345
Manufacturing and reproducing magnetic and optical media	3695	3346

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T).

A source must make the following reports:

Notifications	
Initial notification	§§63.9(b), 63.462(d), 63.468(a), 63.468(b)
Notification that source is subject to special compliance requirements	§63.9(d)
Notification of performance test	§63.9(e)
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)

Reports	
Compliance report for batch cold solvent cleaning machine	§63.468(c)
Statement of Compliance for batch vapor or in-line solvent cleaning machine	§§63.468(d), 63.468(e)
Annual report on operator training for batch vapor or in-line solvent cleaning machine	§63.468(f)
Annual report on solvent emissions for batch vapor or in-line solvent cleaning machine	§63.468(g)
Semiannual or quarterly exceedance reports for batch vapor or in-line solvent cleaning machine	§§63.468(h), 63.468(i)
Equivalency request report	§63.468(k)

A source must keep the following records:

Recordkeeping	
Maintain equipment records for the lifetime of the machine, including owners' manual, installation date, dwell testing, initial performance testing, halogenated HAP solvent contents, and squeegee and air knife system determinations and monitoring	§63.467(a)
Maintain control device monitoring, maintenance, annual solvent consumption, and carbon adsorber records for five years	§63.467(b)
Maintain solvent consumption, waste composition, and emissions calculations records for five years	§63.467(c)
Maintain records on method used to determine cleaning capacity	§63.467(d)
Maintain solvent consumption, solvent recovery, waste composition, and emissions calculations for five years	§63.467(e)

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. Respondents are also required to submit electronic copies of certain notifications through EPA's CEDRI. The notification is an upload of their currently required notification in PDF file. For purposes of this ICR, it is assumed that there is no additional burden associated with the requirement for respondents to submit the notifications 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

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate Install, calibrate, maintain, and operate carbon adsorber for halogenated HAP solvents cleaning machines.
Perform initial performance test, Reference Method 18 or 307 test, and repeat performance tests if necessary.
Write the notifications and reports listed above.

Respondent Activities
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:

Agency Activities
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. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standards and to notate the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The quarterly and semiannual 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 both 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 at least five years.

5(c) Small Entity Flexibility

According to the Final Rule (72 FR 25138): “The final rule is expected to affect 125 ultimate parent entities that will be regulated as major sources. Forty of the parent entities, or approximately one-third, are defined as small entities according to the SBA small business size standards.” Therefore, this ICR assumes that one-third of the affected facilities are small entities (e.g., small businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of these regulations. Due to technical considerations involving the process operations and the types of control equipment employed, the record-keeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (Renewal).

6. Estimating the Burden and Cost of the Collection

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

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

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 31,300 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulations, 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 monitor(s) and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) 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)
Temperature	\$2,700	0	0	\$860	768	\$660,000

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

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 \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$660,000. 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 \$660,000. 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 \$149,000.

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 Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (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 931 existing respondents will be subject to these standards. It is estimated that no additional

respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 931 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	768	163	0	931
2	0	768	163	0	931
3	0	768	163	0	931
Average	0	768	163	0	931

¹ New respondents include sources with constructed, reconstructed and modified affected 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 931.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Batch vapor and in-line cleaning machines:				
Annual compliance report	768	1	0	768
Quarterly exceedance reports	76.8	4	0	307.2
Semiannual exceedance reports	691	2	0	1,382
Batch cold cleaning machines:				

Total Annual Responses				
Initial notification report and compliance report	0	2	163	163
			Total	2,620

The number of Total Annual Responses is 2,620 (rounded).

The total annual labor costs are \$3,760,000 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

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

(i) Respondent Tally

The total annual labor hours are 31,300 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (Renewal).

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

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 12 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$660,000. 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 2,910 labor hours at a cost of \$149,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40

CFR Part 63, Subpart T) (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 the labor hours in this ICR compared to the previous ICR. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden. There is a slight increase in labor costs, which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (September 2021) to calculate respondent burden costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 12 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously-applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

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

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2022-0076. 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-2022-0076 and OMB Control Number 2060-0273 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (Renewal)

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondent s per year ^a	(E) Technical person- hours per year (CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total cost per year (\$) ^b
1. Applications								
a. Batch vapor and in-line cleaning machines	N/A							
b. Batch cold cleaning machines	N/A							
2. Survey and studies								
a. Batch vapor and in-line cleaning machines	N/A							
b. Batch cold cleaning machines	N/A							
3. Reporting Requirements								
a. Batch vapor and in-line cleaning machines								
i. Familiarization with the regulatory requirements ^c	2	1	2	768	1536	76.8	153.6	\$212,079.36
ii. Gather existing information	See 3A(iii)							
iii. Write Report								
Initial notification report	1	1	1	0	0	0	0	\$0
Initial compliance report	4	1	4	0	0	0	0	\$0
Performance test results ^d	30	1	30	0	0	0	0	\$0
Annual compliance report ^e	1.5	1	1.5	768	1152	57.6	115.2	\$159,059.52

Burden Item	(A) Person hours per occurrence e	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total cost per year (\$) ^b
Report with exceedance ^{f, g}	1	4	4	76.8	307.2	15.36	30.72	\$42,415.87
Report with no exceedance ^{f, h}	0.5	2	1	691	691.2	34.56	69.12	\$95,435.71
b. Batch cold cleaning machines								
i. Familiarize with regulatory requirements ⁱ	0.5	1	0.5	163	81.5	4.075	8.15	\$11,253
ii. Gather existing information	See 3B(iii)							
iii. Write Report ^j								
Initial notification report	0.25	1	0.25	0	0	0	0	\$0
Initial compliance report	0.25	1	0.25	0	0	0	0	\$0
Subtotal for Reporting Requirements					4,333.09			\$520,243.37
4. Recordkeeping Requirements								
a. Batch vapor and in-line cleaning machines								
i. Familiarization with the regulatory requirements	See 3A(i)							
ii. Plan activities	N/A							
iii. Implement activities								
Performance test ^d	50	1	50	0	0	0	0	\$0
Control device monitoring ^{k, l}	1.64	12	19.68	384	7557.12	377.856	755.712	\$1,043,430.45
Solvent consumption log ^m	1.5	12	18	384	6912	345.6	691.2	\$954,357.12

Burden Item	(A) Person hours per occurrence e	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total cost per year (\$) ^b
iv. Record Data								
Control device monitoring _{l, n}	1.2	12	14.4	384	5529.6	276.48	552.96	\$763,485.70
Solvent emission calculation ^{m, o}	0.75	12	9	384	3456	172.8	345.6	\$477,178.56
v. Time to train personnel ^p								
b. Batch cold cleaning machines	N/A							
Subtotal for Recordkeeping Requirements						26,973		3,238,452
TOTAL ANNUAL BURDEN AND COST (rounded)^q						31,300		\$3,760,000
Capital and O&M Cost (see Section 6(b)(iii)):^q								\$660,000
TOTAL COST:^q								\$4,420,000

Assumptions:

- ^a We estimate that an average of 931 existing respondents will be subject to the rule over the three-year period of this ICR. Of this total, 768 respondents are subject to batch vapor and in-line cleaning machine requirements while 163 respondents are subject to batch cold cleaning machine requirements. No new respondents are expected.
- ^b This ICR uses the following labor rates: Managerial \$157.61 (\$75.05 + 110%); Technical \$123.94 (\$59.02 + 110%); and 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.
- ^c We assume it will take 2 hours to read instructions.
- ^d We estimate that idling emission or dwell test reports will require 80 technical hours, which are divided between the test report (30 hours) and the test itself (50 hours).
- ^e We assume that 768 facilities are required to complete the annual compliance report.
- ^f The burden of one quarterly and one semiannual exceedance report is included in the burden estimate for the annual report.
- ^g We assume that 10 percent of 768 facilities are in exceedance at least one time per year (quarterly reporting).
- ^h We assume that 90 percent of 768 facilities are not in exceedance (semiannual reporting).
- ⁱ We assume that it will take 0.5 hours to read instructions.

^j We assume that it will take 0.25 hours to write each report.

^k Actual monitoring is conducted weekly, monthly or quarterly for specific control devices. The estimated time is based on the typical control devices expected to be installed.

^l We assume that 50 percent of the facilities will choose the standard equipment and will be required to conduct control device monitoring.

^m We assume that 50 percent of the facilities will choose to do solvent consumption monitoring.

ⁿ We assume that it will take 1.2 hours per facility to record data.

^o We assume that it will take 0.75 hours per facility to record solvent consumption data.

^p We assume that no special training requirements are required.

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

Table 2: Average Annual EPA Burden and Cost – NESHAP for Halogenated Solvent Cleaners/Halogenated Hazardous Air Pollutants (40 CFR Part 63, Subpart T) (Renewal)

Burden Item	(A) Technical person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical person-hours per respondent per year (AxB)	(D) Respondents per year	(E) Technical hours per year (Cx D)	(F) Management hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.1)	(H) Total cost per year (\$) ^a
Report Activity								
1. Batch vapor and in-line cleaning machine								
a. Initial notification report	1	1	1	0	0	0	0	\$0
b. Initial compliance report	2	1	2	0	0	0	0	\$0
c. Performance test results ^b	8	1	8	0	0	0	0	\$0
d. Annual compliance report ^c	2	1	2	768	1536	76.8	153.6	\$90,212.35
Report with exceedance ^{d,e}	1	4	4	76.8	307.2	15.36	30.72	\$18,042.47
Report with no exceedance ^{d,f}	0.5	2	1	691	691.2	34.56	69.12	\$40,595.56
2. Batch Cold Cleaning Machines								
a. Initial notification/compliance report	0.25	1	0.25	0	0	0	0	\$0
TOTAL ANNUAL BURDEN AND COST (rounded) ^g						2,910		\$149,000

Assumptions:

^a. 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.

^b. We assume that it will take 8 hours to review performance test results.

^c. All facilities are expected to submit annual compliance reports summarizing either solvent consumption data or monitoring results for each cleaning machine.

^d. The burden of one quarterly and one semiannual exceedance report is included in the burden estimate for the annual report.

^e. We assume that 10 percent of 768 facilities are in exceedance at least one time per year.

^f We assume that 90 percent of 768 facilities are not in exceedance.

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