

SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

National Volatile Organic Compound Emission Standards for Consumer Products (40 CFR Part 59, Subpart C) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

National Volatile Organic Compound Emission Standards for Consumer Products (40 CFR Part 59, Subpart C) (Renewal), EPA ICR Number 1764.09, OMB Control Number 2060-0348.

1(b) Short Characterization/Abstract

The National Volatile Organic Compound Emission Standards for Consumer Products (40 CFR Part 59, Subpart C) were proposed on April 2, 1996; promulgated on September 11, 1998; and most-recently amended on June 25, 2013. These standards apply to manufacturers, importers, and distributors of consumer products. This information is being collected to ensure compliance with 40 CFR Part 59, Subpart C.

In general, all National Volatile Organic Compound Emission Standards for Consumer (and Commercial) Products require initial notifications 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 these emission standards.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least three years following the date of such measurements, maintenance reports, and records, except for charcoal lighter material compliance test information, which must be retained for at least five years. 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 either 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 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.

either

The "Affected Public" includes manufacturers, importers, and named distributors of consumer products. The 'burden' to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – National Volatile Organic Compound Emission Standards for Consumer Products (40 CFR Part 59, Subpart C) (Renewal). The 'burden' to the "Federal

Government” 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 – National Volatile Organic Compound Emission Standards for Consumer Products (40 CFR Part 59, Subpart C) (Renewal). None of the affected facilities in the United States are owned by either state, or local, or tribal entities or by 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, the respondent universe is expected to be as follows for the three-year period covered by this ICR:

- Total number of affected sources is 3,000;
- Total number of respondents will be 337;
- Number of respondents performing “new” recordkeeping will be 10 percent, or about 300 per year;
- Number of “new” respondents submitting the one-time Initial Notification Report will be 1 percent of the total affected sources, or about 30 per year;
- Number of respondents submitting variance applications will be 5; and
- Number of respondents submitting innovative products applications will be 2.

The active (previous) ICR had the following Terms of Clearance (TOC):

“OMB requests that EPA reformat the Supporting Statement A to the standard 18-question format. In addition, OMB requests that EPA cut and paste the regulatory text that includes the ICR requirements, including the instructions in the regulatory text for how to submit any recording and recordkeeping requirements, into a supplementary document that is also uploaded upon renewal of this ICR. In addition, the method of submission in the regulations (paper, electronic, unspecified) should be clearly explained in the supporting statement.”

At the time of this renewal, the standard 18-question format template is not yet available. The Agency will update this ICR to the standard 18-question format once the template is available and upon the next renewal cycle. We have created a supplementary document with this ICR renewal containing the requested regulatory text. Additionally, the method of submission is described in Section 4 below.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is required under Section 183(e) of the Clean Air Act (Act) to regulate VOC emissions from the use of consumer and commercial products. Pursuant to Section 183(e)(3), the EPA published a list of both consumer and commercial products and a schedule for their regulation on March 23, 1995 (60 FR 15264). Consumer products were included in Group I of the list, and these standards were promulgated on September 11, 1998 and are codified at 40 CFR Part 59, Subpart C.

The reports and recordkeeping activities required under the rule enable the EPA to determine whether these consumer products, which are manufactured or imported for use in the U.S., meet the VOC content limits. Minimal reporting is required. Initial reporting consists of information needed by EPA to: (1) identify the universe of manufacturers and importers subject to the rule; (2) determine the date of manufacture of products; (3) ascertain the location of formulation and batch records for purposes of compliance assurance; and (4) have on record a responsible company official as a primary contact. Notification that a regulated entity has revised its date code system will enable EPA to have access to the most current codes.

Respondents seeking a variance are required to submit an application, which includes the grounds upon which the variance is being sought, the proposed date for coming into compliance, and a plan for achieving compliance.

Companies desiring to market a product under the “innovative products” provisions are required to submit documentation of the VOC emissions from the use of the product as compared to emissions from a product formulated in compliance with the table of standards.

Recordkeeping, consisting of maintenance of formulation data and batch records, enable EPA to determine whether a product offered for sale was, in fact, manufactured with VOC content in compliance with the limits. There is no required testing except for one-time emission testing of charcoal lighter fluid formulations.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these 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.

Agency enforcement personnel will use the information collected to: (1) identify manufacturers and importers subject to the rule; and (2) ensure that consumer products comply with the VOC content standards. These activities are essential to compliance assurance.

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

The requested recordkeeping and reporting are required under 40 CFR part 59, subpart C.

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 either the delegated state or local agency. If a state or local agency has adopted its own standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (88 FR 31748) on May 18, 2023. 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 337 respondents will be subject to these same standards over the three-year period covered by this ICR.

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 Society of Chemical Manufacturers & Affiliates (SOCMA), at 571-348-5100, and the Personal Care Products Council (PCPC), at 202-331-1770. In this case, no comments were received.

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 records of charcoal lighter material compliance test information 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 manufacturers, importers, and named distributors of consumer products. Manufacturers of consumer products

fall within standard industrial classification (SIC) 284, including “Soap, Detergents, Cleaning Preparations” and “Perfumes, Cosmetics, and Other Toilet Preparations;” SIC 287, “Agricultural Chemicals;” and SIC 289, “Miscellaneous Chemical Products.” The corresponding North American Industrial Classification System (NAICS) codes are 3256, “Soap, Cleaning Compound, and Toilet Preparation Manufacturing;” 3253, “Pesticide, Fertilizer, and Other Agricultural Chemical Manufacturing;” and 3259, “Other Chemical Product and Preparation Manufacturing.”

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is either recorded or reported is required by the National Volatile Organic Compound Emission Standards for Consumer Products (40 CFR Part 59, Subpart C).

A source must make the following reports:

Notifications	
Initial notification	§59.209(d)
Notification of change of date coding system	§59.209(e)
Application for variance	§59.206(a)
Documentation of “innovative products”	§59.204(d)

A source must keep the following records:

Recordkeeping	
Records of formulations in use	§59.209(a)
Records of composition of each batch of production	§59.209(a)
Records of charcoal lighter materials testing	§59.209(c)

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.

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
Read instructions.
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.

Agency Activities
Review notifications 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 VOC content standards are being met. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs.

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. 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 three years, except for charcoal lighter material compliance test information, which must be retained for five years.

5(c) Small Entity Flexibility

The impact on small entities (i.e., small businesses) was taken into consideration during the development of these regulations. In the final rulemaking notice, the EPA prepared a regulatory flexibility analysis (FRFA), which examined the impact of the final rule on small entities (See 63 FR 48829, September 11, 1998). The EPA determined that almost 80 percent of the affected companies are small entities. This percentage was applied to the total number of consumer products firms affected by this ICR.

Companies subject to the rule can apply for variances in cases where the company, because of extraordinary reasons beyond reasonable control, cannot comply with the rule. While all variance applications will receive close scrutiny, the EPA will give full consideration to the special needs of small manufacturers and importers.

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 – National Volatile Organic Compound Emission Standards for Consumer Products (40 CFR Part 59, Subpart C) (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 17,500 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 National Volatile Organic Compound Emission Standards 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	\$163.17 (\$77.70 + 110%)
Technical	\$130.28 (\$62.04 + 110%)
Clerical	\$65.71 (\$31.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, “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 only costs to the regulated industry resulting from information collection activities required by the subject standard(s) are labor costs. There are no capital/startup or operation and maintenance costs involved with this ICR.

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

The only type of industry costs associated with the information collection activity in the regulations are labor costs. Once again, there are no capital/startup or operation and maintenance costs associated with this particular ICR.

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 \$7,090.

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

Managerial	\$73.46 (GS-13, Step 5, \$45.91 + 60%)
Technical	\$54.51 (GS-12, Step 1, \$34.07 + 60%)
Clerical	\$29.50 (GS-6, Step 3, \$18.44 + 60%)

These rates are from the Office of Personnel Management (OPM), 2023 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 – National Volatile Organic Compound Emission Standards for Consumer Products (40 CFR Part 59, Subpart C) (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 337 existing respondents will be subject to these standards. It is estimated that 37 existing respondents per year will also submit new reports. The overall average number of respondents, as shown in the table below, is 337 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	(B) Number of Existing	(C) Number of Existing	(D) Number of Existing	(E) Number of Respondents

Number of Respondents					
	Respondents ¹	Respondents	Respondents that keep records but do not submit reports	Respondents That Are Also New Respondents	(E=A+B+C-D)
1	37	37	300	37	337
2	37	37	300	37	337
3	37	37	300	37	337
Average	37	37	300	37	337

¹ The recordkeeping and reporting requirements of 40 CFR Part 59, Subpart C apply to distributors named on product labels or manufacturers or importers of products. We have assumed that 337 respondents per year will do new reporting or recordkeeping due to changes in products.

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 337.

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
Initial notification	30	1	0	30
Update date code	30	1	0	30
Variance application	5	1	0	5
Innovative products application	2	1	0	2
			Total	67

The number of Total Annual Responses is 67.

The total annual labor costs are \$2,210,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – National Volatile Organic Compound Emission Standards for Consumer Products (40 CFR Part 59, Subpart C) (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 17,500 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – National Volatile Organic Compound Emission Standards for Consumer Products (40 CFR Part 59, Subpart C) (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 261 hours per response.

There are no annual capital/startup and O&M costs to the regulated entity.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 133 labor hours at a cost of \$7,090; see below in Table 2: Average Annual EPA Burden and Cost – National Volatile Organic Compound Emission Standards for Consumer Products (40 CFR Part 59, Subpart C) (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

The increase in burden from the most-recently approved ICR is due to an adjustment(s). The adjustment increase in burden from the most-recently approved ICR is due to a correction in

the calculation for clerical labor hours. The most-recently approved ICR incorrectly estimated clerical labor hours by multiplying technical labor hours by 0.01 (1%). This calculation was corrected to multiply technical labor hours by 0.1 (10%). As described above in Section 6(e)(i), 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. Although the supporting statement for the most-recently approved ICR indicated there are 732 respondents, this was based on the sum of all values listed in column D of Table 1, which resulted in double counting. This has been corrected to 337 respondents as described in Sections 1(b) and 6(d), above. However, the number of respondents listed for each line item of Table 1 is unchanged; therefore, this correction did not result in a decrease in the estimated burden. There is an increase in costs from the most-recently approved ICR due to the labor hour correction and the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (September 2022) 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 261 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, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2007-0563. 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-2007-0563 and OMB Control Number 2060-0348 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 – National Volatile Organic Compound Emission Standards for Consumer Products (40 CFR Part 59, Subpart C) (Renewal).

REPORTING/RECORDKEEPING REQUIREMENT ^a		(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year	(E) Technical Hours per Year (E=C x D)	(F) Management Hours per Year (F= E x 0.05)	(G) Clerical Hours per Year (G= E x 0.1)	Total Labor Costs per Year ^b	
Reporting										
1	Read instructions	2	1	2	30	60	3	6	\$8,701	
2	Gather information	1	1	1	30	30	1.5	3	\$4,350	
3	Initial notification	1	1	1	30	30	1.5	3	\$4,350	
4	Update date code	1	1	1	30	30	1.5	3	\$4,350	
5	Variance application	2	1	2	5	10	0.5	1	\$1,450	
6	Innovative products application	24	1	24	2	48	2.4	5	\$6,960	
Total for Reporting							239		\$30,162	
Recordkeeping										
7	Read instructions	-----Included in 1-----								
8	Plan activities	2	1	2	300	600	30	60	\$87,006	
9	Implementation	4	12	48	300	14,400	720	1,440	\$2,088,137	
10	Charcoal lighter results	1	1	1	5	5	0.3	0.5	\$725	
Total for Recordkeeping							17,256		\$2,175,868	

Total Industry Burden (rounded) ^c						17,500		\$2,210,000
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^a The recordkeeping and reporting requirements of 40 CFR Part 59, Subpart C apply to distributors named on product labels or manufacturers or importers of products. We have assumed that 337 respondents per year will do new reporting or recordkeeping due to changes in products.

^b This ICR uses the following labor rates: Managerial \$163.17 (\$77.70 + 110%); Technical \$130.28 (\$62.04 + 110%); and Clerical \$65.71 (\$31.29 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, “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 Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – National Volatile Organic Compound Emission Standards for Consumer Products (40 CFR Part 59, Subpart C) (Renewal)

REPORTING/RECORDKEEPING REQUIREMENT ^a	(A) Person Hours per Occurrence	(B) Occurrences per Year	(C) Technical Person Hours (C=A x B)	(D) Management Person Hours (D = C x 0.05)	(E) Clerical Person Hours (E=C x 0.1)	Total Cost per Year ^b
Reporting						
Initial notification	1	30	30	1.5	3	\$1,834
Update date code	1	30	30	1.5	3	\$1,834
Variance application	8	5	40	2	4	\$2,445
Innovative products application	8	2	16	0.8	1.6	\$978
Total Agency Burden ^c				133		\$7,090

^a The recordkeeping and reporting requirements of 40 CFR Part 59, Subpart C apply to distributors named on product labels or manufacturers or importers of products. We have assumed that 337 respondents per year will do new reporting or recordkeeping due to changes in products. We assume that 37 of these respondents will submit reports for Agency review.

^b The cost is based on the following labor rates: Managerial rate of \$73.46 (GS-13, Step 5, \$45.91 + 60%), Technical rate of \$54.51 (GS-12, Step 1, \$34.07 + 60%), and Clerical rate of \$29.50 (GS-6, Step 3, \$18.44 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

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