

PART A OF THE SUPPORTING STATEMENT

1. IDENTIFICATION OF THE INFORMATION COLLECTION

(a) Title and Number of the Information Collection

ICR: Control Technology for Equivalent Emissions Limitations by Permit under section 112(j) of the Clean Air Act.
OMB Control Number: 2060-0266, EPA ICR # 1648.05.

(b) Short Characterization

Section 112(j) of the Clean Air Act as amended in 1990 (CAAA) requires that if EPA fails to promulgate a standard for a category or subcategory of major sources within 18 months after its scheduled date of promulgation, then sources must submit a title V permit application beginning on that date. States (with approved Title V operating permit programs) or EPA will issue permits containing MACT emission limitations determined on a case-by-case basis to be equivalent to what would have been promulgated by EPA. EPA has promulgated regulations implementing section 112(j).

This is an emergency information collection request renewal for the section 112(j) regulations. EPA will prepare an ICR renewal through the normal process, including public notice and comment, during the period this emergency ICR is in effect.

The previous ICR, OMB Control No. 2060-0266 (EPA ICR #1648.04), was allowed to expire May 2005. At that time, it appeared that the underlying 112(j) rule for which this ICR was necessary would no longer be utilized to collect information as all the major source MACT standards had either been promulgated or were to be promulgated before any application would be due under the 112(j) regulations. Thus, it appeared that the section 112(j) regulations had essentially become unnecessary as the need for applications for case-by-case MACT no longer existed.

However, EPA did not envision the consequence of completely vacated MACT standards on the section 112(j) regulations. A series of court decisions have vacated standards for 4 MACT source categories: 1) polyvinyl chloride and copolymers production, 2) brick and structural clay products manufacturing, 3) clay ceramics manufacturing, and 4) industrial, commercial, and institutional boilers and process heaters. The complete vacatur of these rules triggers the requirements of CAA section 112(j) and reinstates the need for the 112(j) regulations. Thus, there is a need for renewal of the ICR. Renewing an ICR using the normal process would take several months and entail two Federal Register notices and a public comment period. Such a delay would hamper the ability of the states and EPA to get case-by-case MACT limits into source permits and would result in a period of uncertainty for States, the regulated industry, and the public in terms of their respective obligations and/or enforcement authorities. It would also be inconsistent with the statutory requirements of section 112(j).

This ICR supports the regulations to implement section 112(j) (40 CFR part 63, subpart B, §§63.50-56). It addresses the information collection burden (hours and costs) to industry respondents subject to these provisions; State and Local agencies that review applications made under these provisions; and the EPA oversight review of a percentage of State/Local decisions.

This ICR includes about 60,500 affected sources, estimated to be potentially subject to the section 112(j) rule, that we anticipate may need to perform the reporting that the rule requires. We estimate up to about 60,500 affected sources may have to prepare and submit Part 1 and Part 2 title V permit applications. It should be noted that the number of affected sources is greater than the number of facilities or plant sites affected, since a plant site can contain numerous affected sources and be affected by multiple MACT standards. We have determined estimated costs based on the number of affected sources; however, we believe that the actual cost will be somewhat less for facilities that contain several affected sources. The average administrative cost per affected source to perform the reporting is estimated to be \$2,163. Total estimated administrative costs for existing sources may be up to \$130,880,000 for all affected sources in all affected source categories over the next three years.

2. NEED FOR AND USE OF THE COLLECTION

(a) Need/Authority for the Collection

Section 112(j) of the Clean Air Act as amended in 1990 contains the need and authority for this information collection. [42 U.S.C. 7401 (et.seq.) as amended by Public Law 101-549]

(b) Practical Utility/Users of the Data

The information collected in the application documents will be used for the purposes of permit approval, compliance determination, and the selection of particular control technology on a case-by-case basis. The Federal or State administrator of the operating permits program will use the information for the case-by-case emission limit determinations.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

The information collection activities required under the section 112(j) regulations are not routinely collected elsewhere by EPA. However, in this situation, the permitting authority may likely have collected much of the information items previously in support of other applications in the course of implementing or preparing to implement the MACT standards that have been vacated. Most permitting authorities, though, will likely accept references to previously submitted information in lieu of significant duplication.

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

This is an emergency ICR, not subject to public notice. A public review and comment period will occur after proposal of the revised ICR renewal in the *Federal Register*.

3(c) Consultations

EPA did not consult with anyone since the previous ICR renewal.

3(d) Effects of Less Frequent Collection

Each applicant would submit the required information on a one-time-only basis.

3(e) General Guidelines

The recordkeeping and reporting requirements contained in the section 112(j) regulations do not violate any of the Paperwork Reduction Act guidelines contained in 5 CFR 1320.6.

3(f) Confidentiality

Any information submitted to a permitting authority with a claim of confidentiality will be safeguarded according to that agency's policies set forth prior to approval of the agency's operating permit program by EPA. Any confidential information submitted to EPA will be safeguarded according to policies in 40 CFR, Chapter 1, Part 2, Subpart B -- Confidentiality of Business Information.

3(g) Sensitive Questions

This section is not applicable. This ICR does not contain any sensitive questions relating to sexual behavior or attitudes, religious beliefs, or other matters usually considered private.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/SIC Codes

Respondents include owners/operators of *major sources* of hazardous air pollutants (HAPs) in the following source categories: polyvinyl chloride and copolymers production, brick and structural clay products manufacturing, clay ceramics manufacturing, and industrial, commercial, and institutional boilers and process heaters (Table 1). A major source is one that has the potential to emit more than 10 tons per year of any HAP, 25 tons per year for the total of all HAP, or amounts exceeding any lesser quantity cutoff established pursuant to §112(a)(1) of the CAA. This definition of major source cuts across a wide variety of industries, including both manufacturing and nonmanufacturing sources.

4(b) Information Requested

(i) Data items, including recordkeeping requirements

Implementation of the section 112(j) program involves information submitted with the application for a section 112(j) determination. Section 112(j) does not contain recordkeeping requirements, although the source would already keep some of the information necessary to document certain control options.

The section 112(j) regulations divide the section 112(j) application process for the case-by-case MACT determination into two parts. The first part of the section 112(j) MACT application consists of submitting summary administrative information followed by the second part of the section 112(j) MACT application, which requires the technical information necessary for a MACT floor determination.

For a section 112(j) MACT determination, new or existing sources must submit the following information in a two part-application:

Part 1 (§63.53(a)) of the application shall contain:

- The name and address (physical location) of the major source;
- A brief description of the major source, and an identification of the relevant source category;
- An identification of the types of major sources belonging to the relevant source category; and
- An identification of any affected major sources for which a section 112(g) MACT determination has been made.

Part 2 (§63.53(b)(1)) of the application shall contain:

- For new affected sources, the anticipated date of startup of operation;
- The HAPs emitted by each affected source in the relevant source category;
- An estimated total uncontrolled and controlled emission rate for HAPs from the affected source;
- Any existing Federal, State, or Local limitations or requirements applicable to the affected major source;
- An identification of control technology in place for each piece of equipment or activity or major source;
- Information relevant to establishing the MACT floor, and at the option of the owner or operator, a recommended MACT floor; and
- Any other information reasonably needed by the permitting authority, including information required pursuant to subpart A of this part.

Part 2 (§63.53(b)(2)) of the application may, but is not required to, include the following:

- Recommended emission limitations for the affected major source and any necessary supporting information;
 - A description of the control technologies that the respondent will apply to meet the emission limitation; and
 - Relevant parameters to be monitored and the frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.
- (ii) *Respondent Activities*

Activities (Tables 2a and 2b) that the owner or operator must perform are:

Part 1 application:

- Read applicable regulations to determine source applicability and compliance requirements
- Collect basic information required to fulfill §63.53(a)

- Prepare and submit Part 1 application
- Store, file, and maintain application information

Part 2 application:

- Collect basic information required to fulfill §63.53(b)(1)
- Draft and review Part 2 application
- Complete and submit Part 2 application
- Store, file, and maintain application information

5. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

This section addresses the activities of State and Local agencies, as the permitting authority, and EPA, in an oversight capacity. The permitting authority, typically the State or Local air agency, will perform the following activities (Tables 3a and 3b):

Part 1 application:

- Develop application form (1-time event)
- Identify affected sources (1-time event)
- Answer respondent questions about submitting the application
- Receive, review, and file application

Part 2 application:

- Review applications for technical completeness
- Analyze requests for confidentiality and provide protection
- Approve or disapprove application and notify respondents of decision
- Set emission limits on a case-by-case basis
- Prepare draft permit
- Allow for public review of draft permit
- Issue permit containing case-by-case MACT
- File and maintain permit

Acting in an oversight capacity, EPA will perform the following activities (Table 4):

- Audit and review applications
- Review the decisions of permitting authorities

5(b) Collection Methodology and Management

The owners or operators of the sources affected by these regulations will have the responsibility of submitting a Part 1 application to the permitting authority. It is the responsibility of the permitting authority to provide information necessary for EPA oversight review.

Qualified staff that work for the permitting authority will perform the permit reviews and check the quality of data submitted by the applicant on a case-by-case basis. The permitting authority's employees will handle confidential information submitted by the applicant according to the permitting authority's confidential information handling procedures.

The section 112(j) regulations do not require the request of information through any type of survey.

5(c) Small Entity Flexibility

Minimizing the information collection burden for all sizes of organizations is a continuing effort on EPA's part. EPA has reduced the information required by requiring only basic information needed by the permitting authority to make a case-by-case MACT determination.

The section 112(j) regulations do not require recordkeeping. Furthermore, the section 112(j) regulations streamline the application process and require only 2 one-time submittals of information to State/Local agencies.

5(d) Collection Schedule

This ICR does not require surveys. Each source affected by the section 112(j) regulations is required to submit an application. Preparation of an application in compliance with the section 112(j) rules is a one-time only activity (there are 2 submittals for each application). The section 112(j) regulations will not require periodic reporting or surveys.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

This ICR requires the calculation of the amount of burden hours associated with each activity for each respondent. In the section 112(j) permitting process for major sources, each respondent must submit the permit application in two parts as specified in section 4(b)(i) of this Supporting Statement. All activities are conducted on a one-time only basis and are divided into two parts in accordance to the tasks for each part. Tables 2a and 2b provide a breakdown of the burden hours per occurrence for the respondents.

For the section 112(j) regulations, burden for the respondents is a combination of administrative costs (preparing the permit applications) and compliance costs. The permitting process and thus the administrative costs are divided into two parts. The first part of the permit contains summary administrative information. For existing sources, the first part of the permit contains only administrative information. The second part of the permit contains more technical information. After receiving the title V permit containing section 112(j) provisions, the source would then install and operate control equipment to comply with the emission limit established by the section 112(j) case-by-case MACT determination. The source also would comply with any monitoring, recordkeeping, and reporting requirements set by the permitting authority and the EPA.

6(b) Estimating Respondent Costs

(i) Labor costs

Wage rates for industry respondents were retrieved from the Bureau of Labor Statistics. (http://stats.bls.gov/news.release/archives/ecec_09202007.pdf, Table 11. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Private Industry workers, by occupational group and full-time and part-time status, June 2007). The hourly rates are listed as follows: \$51.93 for management labor, \$44.98 for technical labor, and \$22.67 for clerical labor. These labor rates were multiplied by 1.5 to account for overhead costs. Therefore, we estimated the hourly cost of labor for industry sources submitting permit applications to be \$77.90 for management labor, \$67.47 for technical labor, and \$33.94 for clerical labor. Tables 2a and 2b provide a breakdown of labor hours and associated costs per occurrence for each activity in each part of the application process.

(ii) Capital and Operation and Maintenance Costs

Though difficult to determine because of the case-by-case nature of 112(j) determinations, we don't anticipate that capital or operation and maintenance costs associated with application of section 112(j) limits will be significantly different than such costs that have been expended or were to be expended by sources to comply with the MACT standards.

6(c) Estimating State/Local Agency Burden and Cost

Similar to sections 6(a) and 6(b), the activities for State/Local agencies are divided into the activities that would take place for both parts of the application process as described in section 4(b)(i) of this Supporting Statement. Wage rates for State/Local employees were retrieved from the Bureau of Labor Statistics (http://stats.bls.gov/news.release/archives/ecec_09202007.pdf, Table 4. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: State and local government workers, by occupational group and full-time and part-time status, June 2007) and are as follows: \$33.11 per hour for management labor, \$33.22 per hour for technical labor, and \$16.39 per hour for clerical labor. We added in the value of total benefits in BLS Table 4. We chose 20 percent of the base rate as the percentage of salary that constitutes overhead. The addition of benefits and overhead to the hourly rate produces a pay rate that reflects the true cost to employ a State, Local, or Tribal agency worker. Following is a summary of the computed hourly wages for State, Local, and Tribal agency employees.

Hourly Labor Rates for State, Local and Tribal Respondents				
Labor Type	Hourly Rate	Benefits	Overhead (20 % Salary)	Adjusted Hourly Rate
Management	\$33.11	\$14.18	\$6.62	\$53.91
Technical	\$33.22	\$13.79	\$6.64	\$53.65

Clerical	\$16.39	\$10.21	\$3.28	\$29.88
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Tables 3a and 3b provide a breakdown of labor hours and associated costs for State/Local/Tribal agencies.

6(d) Estimating Agency Burden and Cost

Under the section 112(j) regulations, EPA would serve in an oversight capacity and audit approximately 10 percent of all applications processed by State/Local agencies. As recommended in the ICR Handbook, wage rates for EPA employees are based upon the Federal government pay scale. We calculated the hourly rates for EPA employees using information on annual salaries from the Internet site for the Office of Personnel Management. (http://www.opm.gov/oca/07tables/pdf/rus_h.pdf; January 2007) . We used the appropriate pay grade levels for management, technical, and clerical personnel. We divided the annual pay rate by 2080, the amount of working hours during a calendar year, to get the hourly wage rate. We then multiplied this rate by 1.6 to produce a pay rate that reflects the true cost to the Federal government to employ a worker. The value of 1.6 incorporates the addition of benefits at 40 % of salary and the addition of overhead at 20% of salary to the hourly rate. Following is a summary of the computed wages for EPA personnel.

Labor Type	Pay Grade	Annual Salary	Hourly Rate	Benefits (40 % Salary)	Overhead (20 % Salary)	Adjusted Hourly Rate
Management	GS-15	\$104,826	\$50.23	\$20.09	\$10.05	\$80.37
Technical	GS-12	\$63,417	\$30.39	\$12.16	\$6.08	\$48.63
Clerical	GS-6	\$32,172	\$15.42	\$6.17	\$3.08	\$24.67

Table 4 provides a breakdown in the amount of hours associated with each activity and the total burden hours and cost per occurrence.

6(e) The Respondent Universe

In order to estimate the number of affected sources subject to the section 112(j) regulations, EPA reviewed information in the originally promulgated MACT standards for the 4 source categories and allowed for a small amount of growth in the industries. However, for the boilers source category, this estimate is likely high because in the court decision vacating the boilers rule, the court indicated that EPA had inappropriately included certain facilities in the category. At this time, though, without additional information, we are unable to determine a more appropriate estimate.

6(f) Bottom Line Burden Hours and Cost

Over the three-year period of this ICR, the average annual burden and cost associated with the section 112(j) regulations are 1,337,453 hours and \$74,980,110 respectively. Table 5 contains the total burden and cost breakdown associated with the section 112(j) regulations. Table 6 provides a summary of the bottom line burden hours and costs associated with the section 112(j) regulations.

6(g) Reasons for Change in Burden

The ICR 1648.04 spanned the period in which the section 112(j) rule would have applied to any of the 59 source categories covered by the 2000 MACT standards (the 10-year bin). This ICR would affect the 4 source categories covered by the MACT standards that have been vacated by the United States Court of Appeals for the District of Columbia Circuit (see Table 1). Unlike ICR No. 1648.04, which estimated the burden only from the Part 1 application (because all the MACT standards were promulgated before Part 2 applied), this ICR estimates burden for both Part 1 and Part 2, which increases the burden on individual sources.

Because we believe that most sources subject to the vacated MACT standards have already installed controls to meet those standards, we have not calculated compliance costs for the ICR. Finally, EPA has updated the labor rates for respondents, State, Local, and Tribal agencies, and the EPA as discussed in sections 6(b), (c), and (d) of this ICR. These adjustments were made to more accurately reflect the true cost of an hour of labor for the respondents, State, Local, and Tribal agencies, and the EPA. The unloaded hourly rates are different because they are based on the latest available rates from the BLS and the OPM. Table 7 provides a summary of the differences between burden hours and costs associated with each occurrence for the previous and current ICR.

The difference in the burden estimate is due to the adjustments discussed above, including number of respondents, submission of the Part 2 application, and labor rates.

6(h) Burden Statement

This estimate includes all activities associated with the respondents or government agencies. Overall, the section 112(j) program will have the following average annual burden: 689,700 hours and \$43,626,348 for respondents; 645,333 hours and \$31,232,923 for State/Local/Tribal agencies; and 2,420 hours and \$120,839 for the EPA. Table 5 presents the annual burden for respondents, State/Local agencies, and the EPA over the 3-year period studied for existing sources.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information 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 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 not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, Office of Environmental Information, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Avenue, NW, Washington, DC 20460; and 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. Include the EPA ICR number and OMB control number in any correspondence.

Part B of the Supporting Statement

This section is not applicable because statistical methods are not used in the data collection associated with the section 112(j) regulations.

TABLES

Table 1. Source Categories for which MACT Standards have been vacated

Polyvinyl chloride and copolymers production (Part 63, Subpart J)

Brick and structural clay products manufacturing (Part 63, Subpart JJJJ)

Clay ceramics manufacturing (Part 63, Subpart KKKKK)

Industrial, Commercial, and Institutional Boilers and Process Heaters (Part 63, Subpart DDDDD)

Table 2a. Summary of Activities, Labor Hours, and Administrative Costs for Respondents for Part 1 of Application				
Activity	Labor Hours per Occurrence (hr/occ)			
	Management	Technical	Clerical	Total
Wage Rate (\$/hr)	77.9	67.47	33.94	
A. Read applicable regulations to determine source applicability	0.5	1	0	1.5
Cost of A per occurrence	38.95	67.47	0.00	106.42
B. Collect basic information to fulfill 63.53(a)	0	1	0	1
Cost of B per occurrence	0.00	67.47	0.00	67.47
C. Prepare and submit application	0.5	1	0.5	2
Cost of C per occurrence	38.95	67.47	16.97	123.39
D. File and maintain application	0	0	0.2	0.2
Cost of D per occurrence	0.00	0.00	6.79	6.79
Total Hours per Occurrence (hr/occ)	1.0	3.0	0.7	4.7
Total Cost per Occurrence (\$/occ)	\$77.90	\$202.41	\$23.76	\$304.07

Table 2b. Summary of Activities, Labor Hours, and Administrative Costs for Respondents for Part 2 of Application				
Activity	Labor Hours per Occurrence (hr/occ)			
	Management	Technical	Clerical	Total
A. Collect information required by 63.53.(b)(1)	0	4	0	4
Cost of A per occurrence	0.00	269.88	0.00	269.88
B. Fulfill any state or local requirements as set forth by 63.53(b)(1)(vi)	1	4	0	5
Cost of B per occurrence	77.90	269.88	0.00	347.78
C. Process, compile, and review application for accuracy, and appropriateness	1	8	2	11
Cost of C per occurrence	77.90	539.76	67.88	685.54
D. Complete and submit written application	1	4	2	7
Cost of D per occurrence	77.90	269.88	67.88	415.66
E. Store, file, and maintain application information	0.5	1	1	2.5
Cost of E per occurrence	38.95	67.47	33.94	140.36
Total Hours per Occurrence (hr/occ)	3.5	21	5	29.5
Total Cost per Occurrence (\$/occ)	\$272.65	\$1,416.87	\$169.70	\$1,859.22

Table 3a. Summary of Activities, Labor Hours, and Administrative Costs for S/L/T Agencies for Part 1 of Application				
Activity	Labor Hours per Occurrence (hr/occ)			
	Management	Technical	Clerical	Total
Wage Rate (\$/hr)	53.91	53.65	29.88	
A. Develop application form (1-time event)	1	2	1	4
Cost of A per occurrence	53.91	107.30	29.88	191.09
B. Identify affected sources (1-time event)	0	8	2	10
Cost of B per Occurrence	0.00	429.20	59.76	488.96
C. Answer respondent questions about submitting applications.	0	0.2	0	0.2
Cost of C per occurrence	0.00	10.73	0.00	10.73
D. Review and file applications	0.1	1	0.1	1.2
Cost of D per occurrence	5.39	53.65	2.99	62.03
Total Hours per Occurrence (hr/occ)	0.1	1.2	0.1	1.4
Total Cost per Occurrence (\$/occ)	\$5.39	\$64.38	\$2.99	\$72.76

Table 3b. Summary of Activities, Labor Hours, and Administrative Costs for S/L/T Agencies for Part 2 of Application				
Activity	Labor Hours per Occurrence (hr/occ)			
	Management	Technical	Clerical	Total
A. Review applications for technical completeness	0	4	0	4
Cost of A per occurrence	0.00	214.60	0.00	214.60
B. Analyze requests for confidentiality and provide protection	0	1	0	1
Cost of B per occurrence	0.00	53.65	0.00	53.65
C. Approve or disapprove application and notify respondents of decision	0.5	2	1	3.5
Cost of C per occurrence	26.96	107.30	29.88	164.14
D. Set emission limitations on a case-by-case basis	0.1	5	2	7.1
Cost of D per occurrence	5.39	268.25	59.76	333.40
E. Prepare draft permit	0.5	4	1	5.5
Cost of E per occurrence	26.96	214.60	29.88	271.44
F. Public hearing	1	2	1	4
Cost of F per occurrence	53.91	107.30	29.88	191.09
G. Issue permit	0.5	2	1	3.5
Cost of G per occurrence	26.96	107.30	29.88	164.14
H. File and maintain permit	0	1	1	2
Cost of H per occurrence	0.00	53.65	29.88	83.53
Total Hours per Occurrence (hr/occ)	2.6	21	7	30.6
Total Cost per Occurrence (\$/occ)	\$140.17	\$1,126.65	\$209.16	\$1,475.98

Table 4. Summary of Activities, Labor Hours, and Administrative Costs for the EPA

Labor Hours per Occurrence (hr/occ)

Activity	Management	Technical	Clerical	Total
Wage Rate (\$/hr)	80.37	48.63	24.67	
A. Audit and review application	0.1	0.2	0.1	0.4
Cost of A per occurrence	8.04	9.73	2.47	20.23
B. Review decisions of permitting authority	0	0.2	0	0.2
Cost of B per Occurrence	0.00	9.73	0.00	9.73
Total Hours per Occurrence (hr/occ)	0.1	0.4	0.1	0.6
Total Cost per Occurrence (\$/occ)	\$8.04	\$19.45	\$2.47	\$29.96

Table 5. Administrative Burden and Cost Estimates for Respondents, State and Local Agencies, and the EPA for Existing Sources

	Number of 112(j) Occurrences	Total Respondent Burden Hours (hr)	Total Respondent Costs	Total State/Local Burden Hours (hr)	Total State/Local Costs	Total EPA Burden Hours ^a (hr)	Total EPA Costs ^c	Total Burden Hours (hr)	112(j) Administrative Costs
Part 1 Application	60,500	284,350	\$18,396,235	84,700	\$4,401,980	3,630.0	\$181,258	372,680	\$22,979,473
Part 2 Application	60,500	1,784,750	\$112,482,810	1,851,300	\$89,296,790	3,630.0	\$181,258	3,639,680	\$201,960,858
Total	121,000	2,069,100	\$130,879,045	1,936,000	\$93,698,770	7,260	\$362,516	4,012,360	\$224,940,331
Average	40,333	689,700	\$43,626,348	\$645,333	\$31,232,923	2,420	\$120,839	\$1,337,453	\$74,980,110

^aEPA only reviews 10% of permit applications.

Table 6. Bottom Line Burden and Cost Estimate for the Section 112(j) Program

	Number of Respondents ^a	Total Annual Hours Requested (hr)	Total Annualized Costs
	60,500	4,012,360	\$224,940,331
Average	20,167	1,337,453	\$74,980,110

^aNumber of Respondents consists of all existing sources affected by the section 112(j) program.

Table 7. Comparison of Burden and Costs for 2002 ICR and Current ICR				
Parameter	Unit	2002 ICR	Current ICR	Percent Difference
Respondent Burden Hours per Occurrence	(hr/occ)	4.7	34.2	628%
State/Local Burden Hours per Occurrence	(hr/occ)	1.4	32.0	2,186%
EPA Burden Hours per Occurrence	(hr/occ)	0.6	1.2	100%
Total Hourly Wage Rate per Occurrence (Respondents)	(\$/hr)	55	63	15%
Total Hourly Wage Rate per Occurrence (State/Local Agencies)	(\$/hr)	43	48	12%
Total Hourly Wage Rate per Occurrence (EPA)	(\$/hr)	47	50	6%
Respondent Cost per Occurrence	(\$/occ)	260	2,163	732%
State/Local Cost per Occurrence	(\$/occ)	61	1,549	2,439%
EPA Cost per Occurrence	(\$/occ)	24	60	150%

NOTE: Each occurrence is a combined Part 1 and Part 2.