

SUPPORTING STATEMENT

NSPS FOR COAL PREPARATION (40 CFR PART 60, SUBPART Y) (PROPOSED RULE) APRIL 2008

Part A of the Supporting Statement

1. Identification of the Information Collection

(a) *Title and Number of the Information Collection.*

“NSPS for Coal Preparation Plants (40 CFR Part 60, Subpart Y).” The OMB has previously approved the information collection requirements for the existing rule. This is a revision of those existing information collection requirements based on review of the NSPS, and the revision has been assigned OMB control number 2060-0122 and EPA ICR tracking number 1062.10.

(b) *Short Characterization.*

The New Source Performance Standards (NSPS) for the regulations published at 40 CFR Part 60, Subpart Y were proposed on October 24, 1974, and promulgated on January 15, 1976. These regulations apply to the following facilities in 40 CFR Part 60, Subpart Y which process more than 200 tons of coal per day: thermal dryers, pneumatic coal cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), coal storage systems, and coal transfer and loading systems commencing construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 60, Subpart Y.

In general, all 40 CFR Part 60 NSPS standards require initial notifications, performance tests, monitoring, and periodic reports. Owners or operators 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 sources subject to NSPS.

Any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of these measurements, and retain the file for at least two years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Approximately 1,013 coal preparation plants are currently subject to this subpart, and it is estimated that an additional 14 coal preparation plants will become subject to the regulation in the next three years.

2. Need for and Use of the Collection

(a) *Need/Authority for the Collection.*

The EPA is charged under section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best system of emission reduction which (taking into account the cost of achieving such reduction and any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years.

In addition, section 114(a) states that the Administrator may require any owner or 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, particulate emissions from coal preparation plants cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS was promulgated for this source category at 40 CFR part 60, subpart Y.

(b) *Use/Users of the Data.*

The control of emissions of particulate matter resulting from coal preparation plants not only requires the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of particulate matter from coal preparation plants are the result of operation of the affected facilities, which include thermal dryers, pneumatic coal-cleaning equipment, coal processing and conveying equipment (including breakers and crushers), coal storage systems, and coal transfer and loading systems. These standards rely on the reduction of particulate matter emissions by controlling particulate matter emissions using either

fabric filters or chemical dust suppression. The required notifications are used to inform the Agency or delegated authority when a source becomes subject to the standard. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and the standard is being met. Performance test reports are needed as these are the Agency's record of a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. The periodic reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NSPS continue to operate the control equipment used to achieve compliance with the NSPS. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

3. Nonduplication, Consultations, and Other Collection Criteria

(a) Nonduplication.

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 their own similar 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, no duplication exists.

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

Public notice is provided as part of the rulemaking process.

(c) Consultations.

During development of the proposed amendments, EPA held meetings and conference calls with representatives of the following trade associations: Utility Air Regulatory Group and the National Mining Association (NMA). More information is available in the docket for this rulemaking.

Based on the most recent approved ICR, EPA estimates that there are 1,013 existing sources affected by subpart Y. We also estimate that approximately 22 coal preparation plants will be replaced, reconstructed, or expanded over the next 5 years and will require additional testing which equates to 14 coal preparation plants over the next 3 years.

(d) Effects of Less Frequent Collection.

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

(e) General Guidelines.

None of these reporting or recordkeeping requirements violate any of the regulations established by the Office of Management and Budget (OMB) at 5 CFR 1320.5.

(f) Confidentiality.

The required information has been determined not to be confidential. However, 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).

(g) Sensitive Questions.

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested*(a) Respondents/NAICS Codes.*

The North American Industry Classification System (NAICS) codes for respondents affected by the standards are listed in the following table.

Standard (40 CFR part 60, subpart Y)	NAICS Code
Bituminous Coal and Lignite Surface Mining	212111
Bituminous Coal Underground Mining	212112
Anthracite Mining	212113
Support Activities for Coal Mining	213113
Paper (except Newsprint) Mills	322121
Petrochemical Manufacturing	325110
All Other Petroleum and Coal Products Manufacturing	324199
Cement Manufacturing	327310
All Other Petroleum and Coal Products Manufacturing	324199
Fossil Fuel Electric Power Generation	221112

(b) Information Requested.

(i) Data Items, Including Recordkeeping Requirements. All data in this ICR that is recorded and/or reported is required by NSPS for Coal Preparation Plants (40 CFR part 60, subpart Y).

A source must make the following reports:

Reports for 40 CFR part 60, subpart Y	
Notification of construction/reconstruction	60.7(a)(1)
Notification of anticipated startup	60.7(a)(2)
Notification of actual startup	60.7(a)(3)
Initial performance test results	60.8(a)
Notification of initial performance test	60.8(d)
Notification of physical or operational change	60.7(a)(4)
Repeat performance test results	60.8(a)
Excess Emissions Report	60.7(c)

A source must maintain the following records:

Recordkeeping for 40 CFR part 60, subpart Y	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	60.7(b)
Records are required to be retained for two (2) years	60.7(f)
Records of ongoing monitoring	60.7(f)

(ii) *Respondent Activities.* The respondent activities required by subpart Y are listed in the following tables.

Respondent Activities
Read instructions.
Perform initial performance test using appropriate Reference Method, and repeat performance tests if necessary.
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 the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of 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.
Transmit, or otherwise disclose the information.

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

(a) *Agency Activities.*

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

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
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 AIRS Facility Subsystem (AFS) database.

(b) *Collection Methodology and Management.*

Following notification of startup, the reviewing authority might 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 standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs.

Information contained in the reports is entered into the AIRS Facility Subsystem (AFS) which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for over 100,000 industrial and government-owned facilities. EPA uses the AFS 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 or operator for two years.

(c) *Small Entity Flexibility*

There is a distribution of business sizes for the business that have coal preparation plants. A majority of the affected facilities are large entities (e.g., large businesses). However, the impact on potential small entities (i.e., small business) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operation and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger business can use economies of scale to reduce their burden, the overall burden will be reduced.

(d) *Collection Schedule.*

The specific frequency for each information collection activity within this request is shown in Table 2: Annual Burden of Reporting and Recordkeeping Requirements, NSPS for Coal Preparation Plants (40 CFR part 60, subpart Y).

6. Estimating the Burden and Cost of the Collection

Tables 1a, 1b, and 1c [Year 1 Respondent Burden of Reporting and Recordkeeping Requirements, NSPS for Coal Preparation Plants (40 CFR part 60, subpart Y), Year 2 Respondent Burden of Reporting and Recordkeeping Requirements, NSPS for Coal Preparation Plants (40 CFR part 60, subpart Y), and Year 3 Respondent Burden of Reporting and Recordkeeping Requirements, NSPS for Coal Preparation Plants (40 CFR part 60, subpart Y)] document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR for each of the first 3

years. Table 1d contains a summary of the respondent burden costs and hours detailed in Tables 1a, 1b, and 1c.

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.

(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 32,664 hours per year (Total Labor Hours from Tables 1a, 1b, and 1c). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

(b) *Estimating Respondent Costs.*

(i) *Estimating Labor Costs.* Labor rates and associated costs are based on Bureau of Labor Statistics (BLS) data. Technical, management, and clerical average hourly rates for private industry workers were taken from the United States Department of Labor, Bureau of Labor Statistics, September 2007, "Table 2. Civilian Workers, by occupational and industry group," available at www.bls.gov/news.release/ecec.t02.htm. Wages for occupational groups are used as the basis for the labor rates with a total compensation of \$44.78 per hour for technical, \$51.88 per hour for managerial, and \$22.13 per hour for clerical. These rates represent salaries plus fringe benefits and do not include the cost of overhead. An overhead rate of 110 percent is used to account for these costs. The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$94.04, management at \$108.95, and clerical at \$46.47.

(ii) *Estimating Capital and Operations and Maintenance (O&M) Costs.* The capital costs associated with the information collection requirements will include the costs to conduct performance tests and purchase file cabinets for keeping records. The rule will require an initial performance test for each new coal preparation plant. There are no new O&M costs for this rule.

All new facilities are assumed to consist of coal processing and conveying equipment (including breakers and crushers), coal storage systems, or coal transfer and loading systems. In the future, the Agency assumes that no new thermal dryers or pneumatic tables will be installed. All affected sources at subbituminous mines are assumed to use fabric filters; however, all other affected sources at other industry sectors are assumed to use chemical dust suppressants to control fugitive emissions. Fabric filter performance tests at subbituminous mines includes initial Method 5 and Method 9 tests, and all other affected facilities at other industry sectors only include an initial Method 9 test. Both Method 5 and Method 9 testing are usually conducted by a contractor such that the cost of the emissions testing is a capital cost. This is assuming that no plant employs a certified smoke reader. A testing cost of \$7,000 for Method 5 tests and \$1,300 for 3-hour Method 9 tests was used. The Method 9 capital costs assume that a single visible emission observer could conduct visible emission observations for up to three fugitive,

stack, or vent emission points. Method 22 testing will be conducted monthly at all affected facilities. The costs for plants conducting Method 22 tests are accounted for in Tables 1a, 1b, and 1c as they are generally not conducted by a contractor and as such are not considered a capital cost. An employee conducting Method 22 would only need to attend the classroom portion of visible emission observer training course once, and would not have to be a certified smoke reader. The Method 22 industry costs assume that a single visible emission observer could conduct visible emission observations for up to three fugitive, stack, or vent emission points. The total costs for performance testing were calculated for each industry sector covered by subpart Y. The anticipated number of new sources in each sector combined with the number of tests required for each type of model plant resulted in a total capital cost of approximately \$294,000 for Method 5 testing and \$41,600 for Method 9 testing over the next three years.

(iii) *Annualizing Capital Costs.* The annualized capital costs include the costs for performance tests and file cabinets. The capital cost associated with testing was annualized assuming a 7 percent interest rate and 5-year life (i.e., capital recovery factor [CRF] of 0.2439). To calculate annualized costs, the CRF was multiplied by the capital cost of testing. The annualized capital cost for file cabinets was calculated using a 7 percent interest rate and a 15-year life (i.e., CRF of 0.1098). The total annualized capital costs total \$27,405.

(c) *Estimating Agency Burden and Cost.*

Table 2a: Year 1 Burden and Cost to the Agency—NSPS for Coal Preparation Plants, Table 2b: Year 2 Burden and Cost to the Agency—NSPS for Coal Preparation Plants, and Table 2c: Year 3 Burden and Cost to the Agency—NSPS for Coal Preparation Plants document the costs of this NSPS revision to the Agency. The only costs to the Agency are those costs associated with analysis of the reported information. Publication and distribution of the information are part of the AFS program. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of EPA's overall compliance and enforcement program. Table 2d contains a summary of the agency burden costs and hours detailed in Tables 2a, 2b, and 2c. The average annual Agency cost during the three years of the ICR is estimated to be \$209,788.

The Agency labor rates are from the Office of Personnel Management (OPM) 2007 General Schedule which excludes locality rates of pay. These rates can be obtained from Salary Table 2007-GS, available on the OPM website at www.opm.gov/oca/07tables/html/gs_h.asp. The government employee labor rates are \$14.60 per hour for clerical (GS-6, Step 3), \$26.98 for technical (GS-12, Step 1), and \$36.36 for managerial (GS-13, Step 5). These rates were increased by 60 percent to include fringe benefits and overhead. The fully-burdened wage rates used to represent Agency labor costs are: clerical at \$23.36, technical at \$43.17, and managerial at \$58.18.

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

Approximately 1,013 coal preparation plants are currently subject to the regulation. Growth in each of the coal preparation plants sectors was estimated using data compiled from the last ten years of coal preparation plant's permits showing the growth of the industry. Using this information it is estimated that an additional 22 new coal preparation plants will become subject to the regulation over the 5-year NSPS review period. Thus, it is estimated that an additional 14 coal preparation plants per year will become subject to the regulation over the three year ICR period ($22/3 = 13.2$ rounded to 14).

The total annual number of responses for the monitoring, recordkeeping, and reporting requirements in subpart Y is 1,601. This number is calculated by adding the 98 responses for the 14 new facilities that would be subject to additional reporting and recordkeeping requirement under the proposed amendments to the existing rule to the total of 1,503 annual responses in the currently approved ICR.

The total annual labor costs are \$2,957,707. Details upon which this estimate is based appear in Tables 1a, 1b, and 1c.

(e) *Bottom Line Burden Hours and Cost Tables.*

The bottom line burden hours and cost tables for both the Agency and the respondents are attached. The annual public reporting and recordkeeping burden for this collection of information is estimated to average 20 hours per response.

(f) *Reasons for Change in Burden.*

The change in burden from the most recently approved ICR is due to these five reasons. First, the number of coal preparation plants projected to become subject to subpart Y in the next 5 years is different than the previous ICR. Second, new standards in subpart Y require additional monitoring and recordkeeping requirements. Third, the revised analysis for this ICR includes time for management and clerical workers as well as technical staff. And fourth, the performance testing was calculated as a capital cost because it is likely to be conducted by a contractor.

(g) *Burden Statement.*

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 20 hours per response. 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 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 not conduct or 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's 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-2008-0260. An electronic version of the public docket is available at 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 Docket ID Number EPA-HQ-OAR-2008-0260. The documents are also available for public viewing at the EPA Docket Center, EPA West, Room 3334, 1301 Constitution Avenue, 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. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1742. Send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget (OMB), Attn: Desk Officer for EPA, 725 17th St., NW, Washington, DC 20503. Please include the EPA Docket ID Number EPA-HQ-OAR-2008-0260 and OMB Control Number 2060-0122 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because statistical methods are not used in data collection associated with the final rule.

Table 1a. Year 1 Respondent Burden and Cost-NSPS for Coal Preparation Plants

	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(F) Cost/ Year
1. Applications (not applicable)			0					\$0
2. Survey and studies (not applicable)			0					\$0
3. Acquisition, installation, and utilization of technology and systems (not applicable)								\$0
4. Report requirements			0					\$0
A. Read Instructions	1.5	1	1.5	14 ^a	21.0	1.1	2.1	\$2,187
B. Required Activities ^b			0					\$0
Support for Annual Method 5 Source Test	8	1	8	14	112.0	5.6	11.2	\$11,663
Support for Method 9 Source Test	4	5	20	14	280.0	14.0	28.0	\$29,157
Conduct Monthly Method 22 Monitoring	1	60	60	14	840.0	42.0	84.0	\$87,471
C. Create Information (Included in 4B)			0					\$0
D. Gather Existing Information (Included in 4E)			0					\$0
E. Write Report			0					\$0
Notification of construction/ reconstruction commencement	3	1	3	14	42.0	2.1	4.2	\$4,374
Notification of actual startup	3	1	3	14	42.0	2.1	4.2	\$4,374
Notification of performance test	3	2	6	14	84.0	4.2	8.4	\$8,747
Report of performance test (Included in 4B)			0					\$0
Notification of Physical or Operational Change	3	1	3	14	42.0	2.1	4.2	\$4,374
Excess Emission Report	8	1	8	1,041 ^c	8,328.0	416.4	832.8	\$867,217
5. Recordkeeping requirements			0					\$0
A. Read Instructions (Included in 4A)			0					\$0
B. Plan Activities (Included in 4B)			0					\$0
C. Implement Activities (Included in 4B)			0					\$0
D. Record Data			0					\$0
Monitoring - Method 22 readings	1	12	12	14	168.0	8.4	16.8	\$17,494
E. Time to Transmit or Disclose Information			0					\$0
New Facility - Records of startups, shutdowns, malfunctions, etc.	0.25	1	0.25	14	3.5	0.2	0.4	\$364
New Facility - Records of operating parameters	0.1	350 ^d	35	14	490.0	24.5	49.0	\$51,025
Existing Facilities - Records of startups, shutdowns, malfunctions, etc.	0.25	1	0.25	1,013	253.3	12.7	25.3	\$26,372

	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(F) Cost/ Year
Existing Facilities - Records of operating parameters	0.05	350	17.5	1,013	17,727.5	886.4	1,772.8	\$1,846,012
F. Time to Train Personnel			0					\$0
Annual Method 22 Training	8	2	16	14	224.0	11.2	22.4	\$23,326
G. Time for Audits (Not Applicable)			0					\$0
TOTAL ANNUAL LABOR BURDEN AND COST		789		3,235	28,657	1,433	2,866	\$2,984,157
						32,956	Hours	
ANNUAL CAPITAL COSTS								
Performance tests								\$129,200
File cabinets								\$3,290
Total annual capital								\$132,490
ANNUALIZED CAPITAL COSTS								
Performance tests (5 year life, 7% interest; CRF=0.2439)								\$31,512
File cabinets (15 year life, 7% interest; CRF=0.1098)								\$361
Total annualized capital								\$31,873
TOTAL ANNUAL COSTS (O&M)								0
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								\$31,873

- a Estimating that there are approximately 14 CPP which become subject over a 3-year period.
- b We expect that 1 plant will perform Method 5 performance tests on a fabric filter, 5 plants will perform Method 9 performance tests on a enclosures controlled by chemical dust suppression, and all 6 plants will perform monthly Method 22 performance tests on all emission points. Method 22 readings are estimated to take 3 hours and that a single visible emission observer could conduct visible emission observations for up to three fugitive, stack, or vent emission points however this hourly occurrence column was reduced to 1 hour as the plants can perform 3 observations with 1 observer. All industry sectors are expected to use either chemical suppressants or fabric filters and will employ Method 22 readings to comply with the monthly monitoring requirements.
- c For excess emission report writing we are assuming the number of affected facilities is 1,041 (1,013 existing facilities (each submitting 1 report) and 14 new facilities (each submitting 2 reports) (i.e., $1,013 + [2 * 14] = 1,041$).
- d Number of days operating per year

Table 1b. Year 2 Respondent Burden and Cost-NSPS for Coal Preparation Plants

	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(F) Cost/ Year
1. Applications (not applicable)			0		0	0	0	\$0
2. Survey and studies (not applicable)			0		0	0	0	\$0
3. Acquisition, installation, and utilization of technology and systems (not applicable)			0		0	0	0	\$0
4. REPORT REQUIREMENTS			0		0	0	0	\$0
A. Read Instructions	1.5	0	0	0	0	0	0	\$0
B. Required Activities ^b			0		0	0	0	\$0
Support for Annual Method 5 Source Test	8	1	8	14 ^a	112.0	5.6	11.2	\$11,663
Support for Method 9 Source Test	4	5	20	2	40.0	2.0	4.0	\$4,165
Conduct Monthly Method 22 Monitoring ^b	1	60	60	14	840.0	42.0	84.0	\$87,471
C. Create Information (Included in 4B)			0		0	0	0	\$0
D. Gather Existing Information (Included in 4E)			0		0	0	0	\$0
E. Write Report			0		0	0	0	\$0
Notification of construction/ reconstruction commencement	3	0	0	0	0	0	0	\$0
Notification of actual startup	3	0	0	0	0	0	0	\$0
Notification of performance test	3	1	3	16 ^c	48.0	2.4	4.8	\$4,998
Report of performance test (Included in 5B)			0		0	0	0	\$0
Notification of Physical or Operational Change	3	1	3	14	42.0	2.1	4.2	\$4,374
Excess Emission Report	8	1	8	1,041 ^d	8,328.0	416.4	832.8	\$867,217
5. Recordkeeping requirements			0		0	0	0	\$0
A. Read Instructions (Included in 4A)			0		0	0	0	\$0
B. Plan Activities (Included in 4B)			0		0	0	0	\$0
C. Implement Activities (Included in 4B)			0		0	0	0	\$0
D. Record Data			0		0	0	0	\$0
Monitoring - Method 22 readings	1	12	12	14	168.0	8.4	16.8	\$17,494
E. Time to Transmit or Disclose Information			0		0	0	0	\$0
New Facility - Records of startups, shutdowns, malfunctions, etc.	0.25	1	0.25	14	3.5	0.2	0.4	\$364
New Facility - Records of operating parameters	0.1	350 ^e	35	14	490.0	24.5	49.0	\$51,025
Existing Facilities - Records of startups, shutdowns, malfunctions, etc.	0.25	1	0.25	1,013	253.3	12.7	25.3	\$26,372

	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(F) Cost/ Year
Existing Facility - Records of operating parameters	0.05	350	17.5	1,013	17,727.5	886.4	1,772.8	\$1,846,012
F. Time to Train Personnel			0		0	0	0	\$0
Annual Method 22 Training	8	2	16	14	224.0	11.2	22.4	\$23,326
G. Time for Audits (Not Applicable)			0		0	0	0	\$0
TOTAL ANNUAL LABOR BURDEN AND COST		785		3,183	28,276	1,414	2,828	\$2,944,482
						32,518	Hours	
ANNUAL CAPITAL COSTS								
Performance tests								\$103,200
File cabinets								
Total annual capital								\$103,200
ANNUALIZED CAPITAL COSTS								
Performance tests (5 year life, 7% interest; CRF=0.2439)								\$25,170
File cabinets (15 year life, 7% interest; CRF=0.1098)								
Total annualized capital								\$25,170
TOTAL ANNUAL COSTS (O&M)								0
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								\$25,170

- a Estimating that there are approximately 14 CPP which become subject over a 3-year period.
- b We expect that 1 plant will perform Method 5 performance tests on a fabric filter, 5 plants will perform Method 9 performance tests on a enclosures controlled by chemical dust suppression, and all 6 plants will perform monthly Method 22 performance tests on all emission points. Method 22 readings are estimated to take 3 hours and that a single visible emission observer could conduct visible emission observations for up to three fugitive, stack, or vent emission points however this hourly occurrence column was reduced to 1 hour as the plants can perform 3 observations with 1 observer. All industry sectors are expected to use either chemical suppressants or fabric filters and will employ Method 22 readings to comply with the monthly monitoring requirements.
- c Assume 10% of the initial performance tests must repeat due to failure (i.e., 2 additional tests -- 14+2=16).
- d For excess emission report writing we are assuming the number of affected facilities is 1,041 (1,013 existing facilities (each submitting 1 report) and 14 new facilities (each submitting 2 reports) (i.e., 1,013+ [2*14]) =1,041).
- e Number of days operating per year

Table 1c. Year 3 Respondent Burden and Cost-NSPS for Coal Preparation Plants

	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(F) Cost/ Year
1. Applications (not applicable)			0		0	0	0	\$0
2. Survey and studies (not applicable)			0		0	0	0	\$0
3. Acquisition, installation, and utilization of technology and systems (not applicable)			0		0	0	0	\$0
4. REPORT REQUIREMENTS			0		0	0	0	\$0
A. Read Instructions	1.5	0	0	0	0	0	0	\$0
B. Required Activities ^b			0		0	0	0	\$0
Support for Annual Method 5 Source Test	8	1	8	14 ^a	112.0	5.6	11.2	\$11,663
Support for Method 9 Source Test	4	5	20	2	40.0	2.0	4.0	\$4,165
Conduct Monthly Method 22 Monitoring	1	60	60	14	840	42	84	\$87,471
C. Create Information (Included in 4B)			0		0	0	0	\$0
D. Gather Existing Information (Included in 4E)			0		0	0	0	\$0
E. Write Report			0		0	0	0	\$0
Notification of construction/ reconstruction commencement	3	0	0	0	0	0	0	\$0
Notification of actual startup	3	0	0	0	0	0	0	\$0
Notification of performance test	3	1	3	16 ^c	48.0	2.4	4.8	\$4,998
Report of performance test (Included in 5B)			0		0	0	0	\$0
Notification of Physical or Operational Change	3	1	3	14	42.0	2.1	4.2	\$4,374
Excess Emission Report	8	1	8	1,041 ^d	8,328.0	416.4	832.8	\$867,217
5. Recordkeeping requirements			0		0	0	0	\$0
A. Read Instructions (Included in 4A)			0		0	0	0	\$0
B. Plan Activities (Included in 4B)			0		0	0	0	\$0
C. Implement Activities (Included in 4B)			0		0	0	0	\$0
D. Record Data			0		0	0	0	\$0
Monitoring - Method 22 readings	1	12	12	14	168.0	8.4	16.8	\$17,494
E. Time to Transmit or Disclose Information			0		0	0	0	\$0
New Facility - Records of startups, shutdowns, malfunctions, etc.	0.25	1	0.25	14	3.5	0.2	0.4	\$364

	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(F) Cost/ Year
New Facility - Records of operating parameters	0.1	350 ^e	35	14	490.0	24.5	49.0	\$51,025
Existing Facilities - Records of startups, shutdowns, malfunctions, etc.	0.25	1	0.25	1,013	253.3	12.7	25.3	\$26,372
Existing Facility - Records of operating parameters	0.05	350	17.5	1,013	17,727.5	886.4	1,772.8	\$1,846,012
F. Time to Train Personnel			0		0	0	0	\$0
Annual Method 22 Training	8	2	16	14	224.0	11.2	22.4	\$23,326
G. Time for Audits (Not Applicable)			0		0	0	0	\$0
TOTAL ANNUAL LABOR BURDEN AND COST		785		3,183	28,276	1,414	2,828	\$2,944,482
						32,518	Hours	
ANNUAL CAPITAL COSTS								
Performance tests								\$103,200
File cabinets								
Total annual capital								\$103,200
ANNUALIZED CAPITAL COSTS								
Performance tests (5 year life, 7% interest; CRF=0.2439)								\$25,170
File cabinets (15 year life, 7% interest; CRF=0.1098)								
Total annualized capital								\$25,170
TOTAL ANNUAL COSTS (O&M)								0
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								\$25,170

- a Estimating that there are approximately 14 CPP which become subject over a 3-year period.
- b We expect that 1 plant will perform Method 5 performance tests on a fabric filter, 5 plants will perform Method 9 performance tests on a enclosures controlled by chemical dust suppression, and all 6 plants will perform monthly Method 22 performance tests on all emission points. Method 22 readings are estimated to take 3 hours and that a single visible emission observer could conduct visible emission observations for up to three fugitive, stack, or vent emission points however this hourly occurrence column was reduced to 1 hour as the plants can perform 3 observations with 1 observer. All industry sectors are expected to use either chemical suppressants or fabric filters and will employ Method 22 readings to comply with the monthly monitoring requirements.
- c Assume 10% of the initial performance tests must repeat due to failure (i.e., 2 additional tests -- $14+2=16$).
- d For excess emission report writing we are assuming the number of affected facilities is 1,041 (1,013 existing facilities (each submitting 1 report) and 14 new facilities (each submitting 2 reports) (i.e., $1,013+ [2*14]=1,041$).
- e Number of days operating per year

Table 1d. Summary of Respondent Burden and Cost-NSPS for Coal Preparation Plants

Year	Total annual labor burden (hours)	Total annual costs
1	32,956	\$2,984,157
2	32,518	\$2,944,482
3	32,518	\$2,944,482
Total	97,991	\$8,873,121
3-Year Average	32,664	\$2,957,707

Table 2a. Year 1 Burden and Cost to the Agency—NSPS for Coal Preparation Plants

Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Plant/Year	(C) EPA Hours/ Plant/Year (A x B)	(D) Plants/ Year	(E) EPA Technical Hours/ Year (C x D)	(F) EPA Managerial Hours/Year	(G) EPA Clerical Hours/Year	(H) Cost
Observe Onsite Performance Tests - Method 5	24	1	24	2 ^a	48	2.4	0.48	\$2,222.90
Observe Onsite Performance Tests - Method 9	24	1	24	2 ^a	48	2.4	0.48	\$2,222.90
Notification of construction/reconstruction commencement	0.5	1	0.5	14	7	0.35	0.07	\$324.17
Notification of actual startup	0.5	14	7	14	98	4.9	0.98	\$4,538.42
Notification of performance test	0.5	14	7	14	98	4.9	0.98	\$4,538.42
Notification of Physical or Operational Change	0.5	14	7	14	98	4.9	0.98	\$4,538.42
Review Method 5 Performance Test Reports	8	1	8	14	112	5.6	1.12	\$5,186.76
Review Method 9 Performance Test Reports	8	1	8	14	112	5.6	1.12	\$5,186.76
Review Excess Emission Reports - New Facilities	4	1	4	14	56	2.8	0.56	\$2,593.38
Review Excess Emission Reports - Existing Facilities	4	1	4	1,013	4,052	202.6	40.5	\$187,649.74
Total Annual Hours					4,729	236.5	47.29	\$219,001.88
						5,012.7	hours	
Travel Expenses								\$1,600.00
								\$220,601.88

a Assume agency personnel visit all 14 new plants this year.

Travel Expenses = (1 person x 2 plant/year x 3 days/plant x \$50 per diem) + (\$250 round trip/plant x 2 plants/year) = \$1,600/year

Table 2b. Year 2 Burden and Cost to the Agency—NSPS for Coal Preparation Plants

Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Plant/Year	(C) EPA Hours/ Plant/Year (A x B)	(D) Plants/ Year	(E) EPA Technical Hours/ Year (C x D)	(F) EPA Managerial Hours/Year	(G) EPA Clerical Hours/Year	(H) Cost
Observe Onsite Performance Tests - Method 5	24	1	24	1 ^a	24	1.2	0.2	\$1,111
Observe Onsite Performance Tests - Method 9	24	1	24	1 ^a	24	1.2	0.2	\$1,111
Notification of construction/reconstruction commencement	0.5	1	0.5	0	0	0.0	0.0	\$
Notification of actual startup	0.5	14	7	0	0	0.0	0.0	\$
Notification of performance test	0.5	14	7	16 ^b	112	5.6	1.1	\$5,187
Notification of Physical or Operational Change	0.5	14	7	0	0	0.0	0.0	\$
Review Method 5 Performance Test Reports	8	1	8	14	112	5.6	1.1	\$5,187
Review Method 9 Performance Test Reports	8	1	8	2	16	0.8	0.2	\$741
Review Excess Emission Reports - New Facilities	4	1	4	14	56	2.8	0.6	\$2,593
Review Excess Emission Reports - Existing Facilities	4	1	4	1,013	4,052	202.6	40.5	\$187,650
Total Annual Hours					4,396	219.8	44.0	\$203,581
						4,659.8	hours	
Travel Expenses								\$800
								\$204,381

a Assume agency personnel visit 2 plants this year.

b Assume 10% of initial performance tests (2 additional) must be repeated due to failure (14 new facilities' performance tests + 2 additional performance test)

Travel Expenses = (1 person x 2 plant/year x 3 days/plant x \$50 per diem) + (\$250 round trip/plant x 2 plants/year) = \$800/year

Table 2c. Year 3 Burden and Cost to the Agency—NSPS for Coal Preparation Plants

Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Plant/Year	(C) EPA Hours/ Plant/Year (A x B)	(D) Plants/ Year	(E) EPA Technical Hours/ Year (C x D)	(F) EPA Managerial Hours/Year	(G) EPA Clerical Hours/Year	(H) Cost
Observe Onsite Performance Tests - Method 5	24	1	24	1 ^a	24	1.2	0.2	\$1,111
Observe Onsite Performance Tests - Method 9	24	1	24	1 ^a	24	1.2	0.2	\$1,111
Notification of construction/reconstruction commencement	0.5	1	0.5	0	0	0.0	0.0	\$
Notification of actual startup	0.5	14	7	0	0	0.0	0.0	\$
Notification of performance test	0.5	14	7	16 ^b	112	5.6	1.1	\$5,187
Notification of Physical or Operational Change	0.5	14	7	0	0	0.0	0.0	\$
Review Method 5 Performance Test Reports	8	1	8	14	112	5.6	1.1	\$5,187
Review Method 9 Performance Test Reports	8	1	8	2	16	0.8	0.2	\$741
Review Excess Emission Reports - New Facilities	4	1	4	14	56	2.8	0.6	\$2,593
Review Excess Emission Reports - Existing Facilities	4	1	4	1,013	4,052	202.6	40.5	\$187,650
Total Annual Hours					4,396	219.8	44.0	\$203,581
						4,659.8	hours	
Travel Expenses								\$800
								\$204,381

a Assume agency personnel visit 2 plants this year.

b Assume 10% of initial performance tests (2 additional) must be repeated due to failure (14 new facilities' performance tests + 2 additional performance test)

Travel Expenses = (1 person x 2 plant/year x 3 days/plant x \$50 per diem) + (\$250 round trip/plant x 2 plants/year) = \$800/year

Table 2d. Summary of Burden and Cost to the Agency—NSPS for Coal Preparation Plants

Year	Total Annual Labor Burden (Hours)	Total Annual Costs
1	5,013	\$220,602
2	4,660	\$204,381
3	4,660	\$204,381
Total	14,332	\$629,363
3-Year Average	4,777	\$209,788