

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Glass Manufacturing Plants (40 CFR part 60, subpart CC) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Glass Manufacturing Plants (40 CFR part 60, subpart CC) (Renewal),
EPA ICR Number 1131.09, OMB Control Number 2060-0054

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for glass manufacturing plants were proposed on June 15, 1979, promulgated on October 7, 1980, and amended on both October 19, 1984, and October 17, 2000. These regulations apply to each glass melting furnace located at a glass manufacturing plant that commenced construction or modification after June 15, 1979. This information is being collected to assure compliance with 40 CFR part 60, subpart CC.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. Semiannual reports are also required. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NSPS.

Any owner/operator subject to the provisions of this part 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.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Approximately 41 respondents are currently subject to the regulation, and it is estimated that no additional respondents per year will become subject to the regulation in the next three years.

The Office of Management and Budget (OMB) approved the current Information Collection Request (ICR) without any "Terms of Clearance."

The burden to the "Affected Public" may be found in Table 1: Annual Respondent

Burden and Cost (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors, and may be found in Table 2: Average Annual EPA Burden (Renewal).

2. Need for and Use of the Collection

2(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 technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or 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 four years.

In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, particulate matter emissions from glass melting furnaces cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart CC.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

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

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and leaks are being detected and repaired and the standard is being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

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

The requested recordkeeping and reporting are required under 40 CFR part 60, subpart CC.

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own 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.

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 (73 FR 31088) on May 30, 2008. No comments were received on the burden published in the Federal Register.

3(c) Consultations

Information was previously reviewed from the United States Census Bureau, the Air Facility System (AFS), and websites covering glass manufacturing plants. Approximately 41

respondents are currently subject to the regulation, and it is estimated that no additional respondents per year will become subject to the regulation in the next three years.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as 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 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.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. 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. EPA has found that the most flagrant violators have violations extending beyond the five years. In addition, EPA would be prevented from pursuing the violators due to 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

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are inorganic arsenic emissions from glass manufacturing plants. The Standard Industrial Classification (SIC) codes for the respondents affected by the standards, which correspond to the North American Industry Classification System (NAICS) codes, are listed below for source category description.

Standard (40 CFR Part 60, Subpart CC)	SIC Codes	NAICS Codes
Flat Glass Manufacturing	3211	327211
Glass Container Manufacturing	3221	327213
Other Pressed and Blown Glass and Glassware Manufacturing	3229	327212
Mineral Wool Manufacturing	3296	327993

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

In this ICR, all data recorded and/or reported are required by NSPS for Glass Manufacturing Plants (40 CFR part 60, subpart CC) (Renewal).

A source must make the following reports:

Notifications	Standard Citation by Section
Notification of construction/reconstruction	60.7(a)(1)
Notification of actual startup.	60.7(a)(3)
Notification of initial performance test	60.8(d)
Initial performance test results	60.8(a)
Demonstration of continuous monitoring system (CMS)	60.7(a)(5)
Notification of physical or operational change	60.6(a)(4)
Routine maintenance report	60.292(e)(3)
Request for alternative CMS	60.293(d)
Excess emissions report	60.7(c), 60.293(c)(5)

A source must keep the following records:

Recordkeeping	
Startup, shutdown, malfunction periods where the CMS is inoperative	60.7(b)
Records are required to be retained for two years	60.7(f)

Electronic Reporting

Currently, respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must evaluate the data, this internal automation has significantly reduced the burden associated with monitoring and recordkeeping at the plant site.

Also, regulatory agencies, in cooperation with the respondents, continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity.
Perform initial performance test, Reference Method 5 for particulate matter concentration and Method 9 for opacity test, 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.
Train personnel to be able to respond to a collection of information.

Respondent Activities
Transmit, or otherwise disclose the information.

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

5(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 Air Facility System (AFS).

5(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. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into the 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 data for approximately 125,000 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/operator for five years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the

development of the regulation. The number of small entities affected by this rule could not be determined, based on review of the following sources: the proposed rule notice in the Federal Register (44 FR 34840) on June 15, 1979; the promulgated rule notice in the Federal Register (44 FR 66742) on October 7, 1980; the Background Information and Draft Environmental Impact Statement for Glass Manufacturing Plants Volume I (1979); and a search of publicly available current data sources.

Due to technical considerations involving the process operations 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 businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Industry Burden for NSPS for Glass Manufacturing Plants (40 CFR part 60, subpart CC) (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 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.

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 803 (Total Labor Hours from Table 1). 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.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$97.46 (\$46.41 + 110%)
Technical	\$83.71 (\$39.86 + 110%)
Clerical	\$42.55 (\$20.26 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "Table 2: Civilian Workers, by occupational and industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The types of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one time cost when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital / Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Continuous Opacity Monitors	\$15,000	0	0	\$5,800	41	\$237,800

The total capital/startup costs for this ICR are zero. This is the total of column D in the above table. The total operation and maintenance (O&M) costs for this ICR are \$237,800. This is the total of column G.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such 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 \$17,907.

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

Managerial	\$56.02 (GS-13, Step 5, \$35.01 x 1.6)
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Technical	\$41.57 (GS-12, Step 1, \$25.98 x 1.6)
Clerical	\$22.50 (GS-6, Step 3, \$14.06 x 1.6)

These rates are from the Office of Personnel Management (OPM) "2005 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden - NSPS for Glass Manufacturing Plants (40 CFR part 60, subpart CC) (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 41 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below is 41 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	41	0	0	41
2	0	41	0	0	41
3	0	41	0	0	41
Average	0	41	0	0	41

To avoid double-counting respondents column D is subtracted. As shown above, the average Number of Respondents over the three year period of this ICR is 41. 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 Response s	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction or modification	0	1	0	0

Total Annual Responses				
Notification of actual startup	0	1	0	0
Notification of demonstration of CMS	0	1	0	0
Notification of physical or operation change	0	1	0	0
Notification of initial performance test	0	1	0	0
Request for alternative CMS	0	1	0	0
Routine maintenance report	21	1	0	21
Semiannual report of excess emissions	41	2	0	82
			Total	103

The number of Total Annual Responses is 103. The total annual labor costs are \$64,801. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost - NSPS for Glass Manufacturing Plants (40 CFR part 60, subpart CC) (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, respectively, and summarized below.

(i) Respondent Tally

The total annual labor costs are \$64,801. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost - NSPS for Glass Manufacturing Plants (40 CFR part 60, subpart CC) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 7 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$237,800. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 426 labor hours at a cost of \$17,907. See Table 2: Annual Agency Burden and Cost - NSPS for Glass Manufacturing Plants (40 CFR part 60, subpart CC) (Renewal).

6(f) Reasons for Change in Burden

There is no change in the labor hours to the respondents in this ICR compared to the previous ICR. This is due to two considerations: 1) the regulations have not changed over the

past three years and are not anticipated to change over the next three years; and 2) the growth rate for respondents is very low, negative, or non-existent. Therefore, the labor hours in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR. There is a minor change to the cost figures, since the previous ICR rounded to the nearest \$1,000; this ICR presents a cost figure \$200 less than the previous ICR due to using the exact figure.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 8 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-OECA-2008-0377. 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), EPA 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. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1927. 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-OECA-2008-0377 and OMB Control Number 2060-0054 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 - NSPS for Glass Manufacturing Plants (40 CFR part 60, subpart CC) (Renewal)

Burden item	(A) Technical Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical Person- hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total Cost per year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read Instructions ^c	1	1	1	0	0	0	0	\$0
B. Required Activities								
Initial performance test ^d	160	1	160	0	0	0	0	\$0
Repeat of performance test ^e	160	0.2	32	0	0	0	0	\$0
C. Create Information	Included in 3B							
D. Gather existing information	Included in 3B							
E. Write report								
Notification of construction/reconstruction or modification	2	1	2	0	0	0	0	\$0
Notification of actual startup ^f	2	1	2	0	0	0	0	\$0
Notification of demonstration of CMS	2	1	2	0	0	0	0	\$0
Notification of physical or operation change ^g	2	1	2	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Performance test report	Included in 3B							

Burden item	(A) Technical Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical Person- hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total Cost per year ^b
Demonstration of CMS	Included in 3B							
Request for alternative CMS	4	1	4	0	0	0	0	\$0
Routine maintenance report ^h	2	1	2	21	42	2.1	4.2	\$3,899.20
Semiannual report	8	2	16	41	656	32.8	65.6	\$60,901.73
SUBTOTAL Reporting					698	34.9	69.8	\$64,800.93
4. Recordkeeping Requirements								
A. Read Instructions	Included in 3A							
B. Plan activities	Included in 3B							
C. Implement activities	Included in 3B							
D. Develop record system	N/A							
E. Time to enter information	Included in 3E							
F. Train personnel	N/A							
G. Audits	N/A							
SUBTOTAL Recordkeeping					0	0	0	\$0
Subtotal Labor Burden					698	34.90	69.80	\$64,800.93
TOTAL LABOR BURDEN AND COST					802.70			\$64,800.93

Assumptions:

^a We have assumed that the average number of existing respondents is 41, and that no additional new sources will become subject to the rule over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$97.46 per hour for Executive, Administrative, and Managerial labor; \$83.71 per hour for Technical labor, and \$42.55 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c We have assumed that it will take one hour to read instructions as part of their reporting requirements.

^d We have assumed that it will take 160 hours to complete a performance test.

^e We have assumed that 20 percent will fail the performance tests.

^f We have assumed that it will take two hours to write notification of actual startup report.

^g We have assumed that it will take two hours to write notification report of physical or operation change.

^h We have assumed that 50 percent of respondents will submit routine maintenance reports.

Table 2: Average Annual EPA Burden - NSPS for Glass Manufacturing Plants (40 CFR part 60, subpart CC) (Renewal)

Burden item	(A) Technical Person Hours Per Occurrenc e	(B) Number of Occurrences Per Year	(C) Technical Person Hours Per Plant Per Year (C=AxB)	(D) Plants Per Year ^a	(E) Technical Hours Per Year (E=CxD)	(F) Management Hours Per Year (F=0.05xE)	(G) Clerical Hours Per Year (G=0.1xE)	(H) Total Cost, Per Year ^b
Initial performance tests								
New or modified facility ^c	40	1	40	0	0	0	0	\$0
Repeat performance test								
New or modified facility ^{c,d}	40	0.2	8	0	0	0	0	\$0
Report review								
New or Modified Facility								
Modification of construction/reconstruction or modification ^e	2	1	2	0	0	0	0	\$0
Notification of actual startup ^f	0.5	1	0.5	0	0	0	0	\$0
Notification of demonstration of CMS ^f	0.5	1	0.5	0	0	0	0	\$0
Notification of physical or operational change ^f	0.5	1	0.5	0	0	0	0	\$0
Notification of initial performance test ^f	0.5	1.2	0.6	0	0	0	0	\$0
Review of performance test results ^g	8	1.2	9.6	0	0	0	0	\$0
Review demonstration of CMS		Included in review of performance test results						
Review request for alternative CMS	4	1	4	0	0	0	0	\$0
Review of routine maintenance report ^h	2	1	2	21	42	2.1	4.2	\$1,958.08
Review of semiannual reports	4	2	8	41	328	16.4	32.8	\$15,949.33

Burden item	(A) Technical Person Hours Per Occurrenc e	(B) Number of Occurrences Per Year	(C) Technical Person Hours Per Plant Per Year (C=AxB)	(D) Plants Per Year ^a	(E) Technical Hours Per Year (E=CxD)	(F) Management Hours Per Year (F=0.05xE)	(G) Clerical Hours Per Year (G=0.1xE)	(H) Total Cost, Per Year ^b
Subtotals Labor Burden and Cost					370	18.50	37	\$17,907.41
TOTAL LABOR BURDEN AND COST						425.50		\$17,907.41

Assumptions:

^a We have assumed that the average number of existing respondents is 41, and that no additional new sources will become subject to the rule over the three-year period of this ICR.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$56.02 for Managerial (GS-13, Step 5, \$35.01 x 1.6), \$41.57 for Technical (GS-12, Step 1, \$25.98 x 1.6) and \$22.50 Clerical (GS-6, Step 3, \$14.06 x 1.6). These rates are from the Office of Personnel Management (OPM) "2005 General Schedule" which excludes locality rates of pay.

^c We have assumed that it will take 40 hours to participate with the performance tests.

^d We have assumed that 20 percent of respondents will repeat performance tests because of failure.

^e We have assumed that it will take two hours to review construction report.

^f It will take each respondent 0.5 hours to review actual startup report, CMS report, physical or operational change report, and initial performance test report.

^g We have assumed that it will take eight hours to review performance test results.

^h We have assumed that 50 percent of respondents will submit routine maintenance reports.