

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (Renewal),
EPA ICR Number 1891.05, OMB Control Number 2060-0428

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations for Publicly Owned Treatment Works, published at 40 CFR part 63, subpart VVV, were proposed on December 1, 1998 and promulgated on October 26, 1999. These regulations apply to existing and new publicly-owned treatment works (POTWs) located at a major source of hazardous air pollutants, or industrial POTWs that are either area, or major sources. Affected sources must develop and implement a pretreatment program defined by 40 CFR 403.8, or meet the general criteria for development and implementation of a pretreatment program. New facilities include those that commenced construction, or reconstruction after the date of proposal. This information is being collected to ensure compliance with 40 CFR part 63, subpart VVV.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They also are 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 reporting also is required. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports 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 U. S. 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 that each plant site has only one respondent (i.e., the owner/operator of the plant site).

We have assumed that an average of six sources will be subject to the regulation over the next three years. It is estimated that no new additional sources per year will become subject to the regulation.

All the publicly-owned treatment works facilities in the United States are owned and operated by state, local, or tribal government (the “Affected Public”). The burden to the “Affected Public” is listed below in Table 1: Annual Industry Burden and Cost - NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (Renewal). The Federal government burden associated with the review of reports submitted by the respondent is shown below in Table 2: Average Annual EPA Burden - NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (Renewal).

The Office of Management and Budget (OMB) approved the currently active ICR without any “Terms of Clearance.”

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants (HAP). These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. 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, hazardous air pollutant emissions from POTWs cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP standards were promulgated for this source category at 40 CFR part 63, subpart VVV.

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. In addition, the collected information is 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 tests, 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 ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standards are 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 63, subpart VVV.

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 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.

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

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately six respondents will be subject to the standard over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed.

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.

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 proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

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 publicly owned treatment works. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards is SIC 4952, which correspond to the North American Industry Classification System (NAICS) codes 221320 for sewerage treatment facilities.

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 the data recorded or reported is required by the NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV).

A source must make the following reports:

Notifications	
Initial notification	63.9(b), 63.1591(b)
Request for extension of compliance	63.09(c)
Notification of special compliance requirements	63.09(d)
Notification of initial performance tests	63.09(e), 63.07(b)
Additional notification requirements for sources with CMS	63.09(g)
Notification of compliance status	63.09(h)
Notification of adjustments to time periods for submitting required communications	63.09(i)
Notification of changes to information provided	63.09(j)

Reports	
Initial performance test report	63.10(d), 63.1590(f)
Startup, shutdown, malfunction report	63.1590(f)
Inspection and monitoring plan	63.1588(c)
Semiannual report	63.1590(f)
Excess emissions report	63.10(e)
Initial report on compliance approach	63.1590(g)

A source must keep the following records:

Recordkeeping	
Record of annual inspections	63.1589 (a)(1)

Recordkeeping	
Records of defects detected	63.1589(a)(2)
Records of defect repair delays	63.1589(a)(3)
Records of control devices covered by other NESHAPS	63.1590(a)(4)
Records of methods used to calculate annual HAP emissions	63.1589(b)(1)
Record of methods and data used to determine if POTW meets fraction emitted standard	63.1589(b)(2)
Records of methods and data that demonstrates POTW is in continuous compliance	63.1589(b)(3)
Maintain records of five years	63.10(b)(1)
Records of startups, shutdowns, and malfunctions	63.10(b)(2)

Electronic Reporting

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

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

Respondent Activities
Read instructions.
Write the notifications and reports listed above.
Prepare required plans and perform initial performance test, if required
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.

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., continuous parameter monitoring system). Although personnel at the

source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

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, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the OTIS.

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 operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs.

Information contained in the reports is entered into OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. EPA 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 five years.

5(c) Small Entity Flexibility

The 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. 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 to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small

entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Industry Burden for NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (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. Wherever 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 14 (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 NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$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 percent to account for the benefit packages available to those employed by private industry.

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

The only costs to the regulated industry resulting from information collection activities

required by the subject standard are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in the regulations is labor costs. There are no capital/startup or operation and maintenance costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA 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 \$559.

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

Managerial	\$56.02	(GS-13, Step 5, \$35.01 x 1.6)
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. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden for NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (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 six existing respondents will be subject to the standard. The overall average number of respondents, as shown in the table below, is six per year.

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

Number of Respondents					
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	6	0	0	6
2	0	6	0	0	6

Number of Respondents					
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
3	0	6	0	0	6
Average	0	6	0	0	6

¹ New respondent include sources with constructed, reconstructed and modified affected facilities.

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 six.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Initial performance test report	0	1	0	0
Startup, shutdown, malfunction report	0	1	0	0
Inspection and monitoring plan	0	1	0	0
Semiannual report	6	2	0	12
Excess emissions report	0	1	0	0
Initial report on compliance approach	0	1	0	0
			Total	12

The number of Total Annual Responses is 12.

The total annual labor costs are \$1,114. Details regarding these estimates may be found below in Table 1: Annual Industry Burden and Cost - NESHP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (Renewal).

6(e) Bottom Line Burden Hours 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 hours are 14. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost: NESHP for Publicly Owned Treatment Works

(40 CFR Part 63, Subpart VVV) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average one hour per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 14 labor hours at a cost of \$559. See below Table 2: Annual Agency Burden and Cost: NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (Renewal).

6(f) Reasons for Change in Burden

There is no change in the labor hours in this ICR compared to the previous ICR. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the current growth rate for the industry is very low, negative or nonexistent, so there is no significant change in the overall burden.

Since there are no changes in the regulatory requirements and there is no significant industry growth, the labor hours and cost figures in the previous ICR are used in this ICR, and there is no change in burden to industry.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average one hour per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, 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-2008-0281. 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

content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search” than 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 Avenue, N.W., 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 Enforcement and Compliance Docket and Information Center Docket is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2008-0281 and OMB Control Number 2060-0428 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) 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	4	1	4	0	0	0	0	\$0
b. Required activities								
Initial notification	2	1	2	0	0	0	0	\$0
Notification of compliance status	N/A							
c. Create information	See 3B							
d. Gather existing information	See 3B							
e. Write reports								
Request for extension of compliance	2	1	2	0	0	0	0	\$0
Notification of special compliance requirements	2	1	2	0	0	0	0	\$0
Notification of initial performance test	N/A							
Additional notification requirements for source with CMS	2	1	2	0	0	0	0	\$0
Notification of adjustments to time periods	2	1	2	0	0	0	0	\$0
Notification of changes to information provided	2	1	2	0	0	0	0	\$0
Initial performance test report	N/A							
Inspection and monitoring plan	N/A							
Startup, shutdown, and malfunction plan	N/A							
Semiannual report ^d	1	2	2	6	12	0.6	1.2	\$1,114.06
Startup, shutdown, malfunction report	N/A							
Excess emissions report	N/A							
Initial report on compliance approach	2	1	2	0	0	0	0	\$0
Subtotal for Reporting Requirements						13.8		\$1,114.06

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) 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
4. Recordkeeping requirements								
a. Read instructions	See 3E							
b. Plan activities	See 3E							
c. Implement activities	See 3E							
d. Develop record system	See 3E							
e. Time to enter information								
Records of annual inspections	N/A							
Records of treatment unit, inspections, defects detected, defect repair delays, control devices	N/A							
Methods and data used to determine HAP emissions, compliance with fraction emitted standard, and continuous compliance	N/A							
f. Time to transmit or disclose information	N/A							
g. Time to train personnel								
h. Audits	N/A							
Subtotal for Recordkeeping Requirements						0		0
					12	0.6	1.2	\$1,114.06
TOTAL LABOR BURDEN AND COST (rounded)						13.8 14 (rounded)		\$1,114

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be six. There will be no new sources that will become subject to the rule over the three-year period of the ICR. There are no emission limits or control requirements under subpart VVV for existing sources subject to this ICR. Compliance with subpart VVV is demonstrated by operating treatment and control devices which meet all requirements specified in the appropriate industrial NESHAP(s). Performance testing, plan development, and reporting are only required for new sources subject to subpart VVV. Therefore, these requirements as shown above are not applicable.

^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 percent to account for the benefit

packages available to those employed by private industry.

^c We have assumed that it will take four hours for each new respondent to read instructions.

^d We have assumed that it will take each respondent one hour two times per year to write semiannual report.

Table 2: Average Annual EPA Burden - NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants 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) Cost, \$ ^b
Initial performance tests	N/A							
Repeat performance test	N/A							
Report review								
Initial notification	2	1	2	0	0	0	0	\$0
Notification of compliance status	2	1	2	0	0	0	0	\$0
Request for extension of compliance	2	1	2	0	0	0	0	\$0
Notification of special compliance Requirements	2	1	2	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Additional notification requirements for Sources with CMS	2	1	2	0	0	0	0	\$0
Notification of adjustments to time periods for submitting required communications	2	1	2	0	0	0	0	\$0
Notification of changes to information Provided	2	1	2	0	0	0	0	\$0
Initial performance test report	N/A							
Inspection and monitoring plan	N/A							
Semiannual report	N/A							
Startup, shutdown, malfunction report ^c	1	2	2	6	12	0.6	1.2	\$559.46
Excess emissions report	N/A							
Initial report on compliance approach	2	1	2	0	0	0	0	\$0
Subtotals Labor Burden and cost					12	0.6	1.2	\$559.46
TOTAL ANNUAL BURDEN AND COST						13.8		\$559

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants 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) Cost, \$ ^b
(rounded)						14 (rounded)		

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be six. There will be no new sources that will become subject to the rule over the three-year period of the ICR. There are no emission limits or control requirements under subpart VVV for existing sources subject to this ICR. Compliance with subpart VVV is demonstrated by operating treatment and control devices which meet all requirements specified in the appropriate industrial NESHAP(s). Performance testing, plan development, and reporting are only required for new sources subject to subpart VVV. Therefore, these requirements as shown above are not applicable.

^b This cost is based on the following labor rates which incorporates 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 each respondent one hour two times per year to complete SSM report.