

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Small Municipal Waste Combustors (40 CFR Part 60, Subpart AAAA)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Small Municipal Waste Combustors (40 CFR Part 60, Subpart AAAA) (Renewal)
EPA ICR Number 1900.04, OMB Control Number 2060-0423

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for the regulations published at 40 CFR part 60, subpart AAAA were proposed on August 30, 1999, and promulgated on December 6, 2000. These regulations apply to the following facilities in small municipal waste combustors (MWCs) that combust greater than 35 tons per day (tpd) but less than 250 tpd of municipal solid waste: small MWCs commencing construction after August 30, 1999, and small MWC units that commenced reconstruction or modification after June 6, 2001. This information is being collected to assure compliance with 40 CFR part 60, subpart AAAA.

In general, all NSPS require initial notifications, performance tests, and periodic reports. Owners or operators 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. These notifications, reports, and records are essential in determining compliance and are required of all sources subject to NSPS. This Information Collection Request (ICR) will enable the U.S. Environmental Protection Agency (EPA) to monitor compliance with emission standards for regulated pollutants. Owners and operators of small MWCs are required to measure, record, and report emission rates and operating parameters, follow good combustion practices, and submit a siting analysis.

Any owner or 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 EPA regional office.

Approximately four small MWC units (i.e., sources) at two plants (i.e., respondents) are subject to the regulation, and it is estimated that one additional privately owned MWC unit (therefore, potentially one additional private industry respondent) will become subject to the regulation in the next three years.

The burden to the affected public, the owners or operators of small MWCs commencing construction after August 30, 1999, or commencing reconstruction or modification after June 6,

2001, is listed below in Table 1a: Annual Private Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA) (Renewal) and Table 1b: Annual State/Local Government Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA) (Renewal). One currently subject plant is owned privately, and one plant is owned publically (local government). The Federal government burden, such as the review of reports submitted by the respondents, is attributed entirely to work performed by Federal employees or government contractors and is shown in Table 2: Annual Agency Burden for the NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA) (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 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 the Administrator’s judgment, organics, metals, and acid gases emissions from small MWCs cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. MWC organics consist of doxins/furans. MWC metals are cadmium, lead, mercury, and particulate matter. MWC acid gases consist of hydrogen chloride, sulfur dioxide, and nitrogen oxides. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart AAAA.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standards ensure compliance with the applicable regulations that were promulgated in accordance with the Clean Air Act. The collected information also 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 standards. Continuous emission monitors are used to ensure compliance with the standards 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 standards 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 that the standards are being met. The performance test also may 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 AAAA.

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 (74 FR 32580) on July 8, 2009. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted regarding the current number of affected facilities and to project industry growth over the next three years. The EPA Office of Air Quality Planning and Standards maintains a facility and emissions inventory for municipal waste combustors. The universe of sources subject to the standard and the growth rate for the industry are based on our consultations with the Agency's internal industry experts who maintain and utilize this inventory.

Approximately one new private respondent 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, and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

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

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain 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 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 and 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 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

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are small municipal waste combustors. The United States Standard Industrial Classification (SIC) codes and the associated North American Industry Classification System (NAICS) codes for possible respondents affected by the standards are listed in the table below.

Regulation	SIC Codes	NAICS Codes
40 CFR part 60, subpart AAAA	9511 Air & Water Resource and Solid Waste Management	92411 Air & Water Resource and Solid Waste Management
	4953 Refuse System	562213 Solid Waste Combustors & Incinerators

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA).

A source must make the following reports:

Reports for NSPS Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA)	
Construction/reconstruction	60.7(a)(1), 60.1375
Reports due before and after notice of construction	60.1375 60.1385
Actual startup	60.7(a)(3),
Initial stack tests for all regulated pollutants and parameters	60.8(a) and (d), 60.1395, 60.1400 60.1430
Notice of construction	60.1380
Semi-annual reports	60.1415 - 60.1420, 60.1430
Annual compliance reports for all pollutants and parameters	60.1405, 60.1410, 60.1430

Reports for NSPS Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA)	
Reports for air curtain incinerators	60.1455
Demonstration of continuous monitoring system and test data	60.7(a)(5), 60.1395
Physical or operational change	60.7(a)(4)
Semiannual excess emission reports (SO ₂ , CO, load, temperature, PM, dioxin/furan, opacity, HCl, Cd, Pb, Hg, fugitives)	60.1425
Report of continuous emission monitors (CEMs) demonstration and test data	60.1410

A source must keep the following records:

Recordkeeping for NSPS Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA)	
Records of occurrence and duration of any startups, shutdowns, malfunctions, or any malfunction of CEMS	60.7(b), 60.1340, 60.1365
Records on material separation plan and siting analysis	60.1345(a) 60.1350
Records of operator training and certification	60.1340(b), 60.1355
Records of initial stack tests and annual stack tests	60.1340(c), 60.1360
Records for CEMS rates and parameters and computations of average emissions and parameters	60.1340(d), 60.1365, 60.1370
Records of MWC units that use activated carbon. Records of quarterly amount of sorbent for Hg control	60.1340(e), 60.1370
Records of results of daily CEMS drift tests and Appendix F accuracy assessments	60.1365
Records are required to be retained for 5 years. The full 5 years of records must be retained at the facility	60.1345

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 still

not widely used. It is estimated that approximately 10 percent of all general respondents in any industry use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CEMS for opacity, SO ² , NO _x , O ² .
Perform initial and annual performance tests, Reference Methods 1 and 23 for organics; Reference Methods 1 and 29 for Cd, Pb, Hg; Reference Method 9 for opacity; Reference Methods 1 and 5 for particulate matter; Reference Methods 1 and 26 or 26A for acid gases; and Reference Method 22 for fugitive ash. Repeat performance tests if necessary.
Conduct quarterly Appendix F audits of CEMS.
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. Ensure operators' training and certification.
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.

Agency Activities
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 could 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 AFS, which is operated and maintained by the EPA Office of Compliance. AFS is the EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses 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

Small MWC units potentially affected by the NSPS also are owned by small businesses, non-profit organizations, or governments. The EPA does not expect the standards to adversely affect these small entities. The standards only apply to units with capacities between 35 tpd and 250 tpd. Furthermore, the standards contain provisions for reduced testing. Owners of some small MWC units can skip annual tests for two-year periods for certain pollutants if they have demonstrated compliance for three annual tests in a row. In addition to this reduced testing option, less frequent dioxin/furan testing is possible if all MWC units at a plant achieve emission levels less than the emission limit for two consecutive years. This provision allows plants to test only one unit per year rather than all units, as normally required.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1a: Annual Private Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA) (Renewal) and Table 1b: Annual State/Local Government Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1a (private respondents) and Table 1b (state/local governments) document the computation of the individual, respective burdens for the recordkeeping and reporting requirements applicable to the industry for the subparts 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 combined average annual burden to both private and state/local entities in this industry over the next three years from these recordkeeping and reporting requirements is estimated to be 9,975 hours. These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the 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	\$114.77 (\$54.65 + 110%)
Technical	\$97.59 (\$46.47 + 110%)
Clerical	\$48.26 (\$22.98 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, Table 2. "Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by occupational and industry group," March 2009. The rates are from the column "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 type of both private and state/local entities in the industry costs associated with the information collection activities in the subject standards 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 costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors 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 Affected Facility	(C) Number of New Facilities	(D) Total Capital/Startup Cost, (B x C)	(E) Annual O&M Costs for One Facility	(F) Number of Facilities with O&M	(G) Total O&M, (E x F)
Load monitors, temperature monitors, and carbon federate monitors (Sections 60.1315 thru 60.1335)	\$200,000	0.33 ^a	\$66,000	\$19,200	4.33 ^b	\$83,136

^a We estimate that one additional facility will become subject to this subpart over the next three years. Therefore, we estimate the number of new facilities to be 0.33 per year.

^b The estimated number of facilities with O&M costs includes the four existing facilities and the one additional facility (0.33 per year) expected to startup over the next three years.

The total capital/startup cost for this ICR is \$66,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) cost for this ICR is \$83,136. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to both the private and state/local entities of this industry over the next three years of the ICR is estimated to be a combined total of \$149,136.

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 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 \$25,480 (rounded).

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

Managerial	\$61.36	(GS-13, Step 5, \$38.35 x 1.6)
Technical	\$45.52	(GS-12, Step 1, \$28.45 x 1.6)
Clerical	\$24.64	(GS-06, Step 3, \$15.40 x 1.6)

These rates are from the Office of Personnel Management “2009 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: Annual Agency Burden for the NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA) (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, two existing respondents will be subject to the standard. It is estimated that one additional respondent will become subject to this standard over the next three years. The overall average number of respondents, as shown in the table below, is 2.33 per year.

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

Number of Respondents					
Year	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports		
1	0.33	2	0	0	2.33
2	0.33	2	0	0	2.33
3	0.33	2	0	0	2.33
Average	0.33	2	0	0	2.33

¹We are assuming that one additional respondent starts up over the period of this ICR.

As shown above, the average Number of Respondents over the three-year period of this ICR is 2 (rounded).

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 Per Respondent Per Year	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(B \times C)+D$
Plant Startup (Waste Separation Plan, Notifications, etc.)	0.33	4	0	1.32
Notifications (Performance Test, CEMS Demonstration, etc.)	0.33	4	0	1.32
Annual Reports	2.33	1.86	0	4.33
Semiannual Excess Emission Reports	1	2	0	2
Total				9 (Rounded)

The number of Total Annual Responses is nine (9).

The total annual labor costs are \$938,068. Details regarding these estimates may be found in Table 1a: Annual Private Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA) (Renewal) and Table 1b: Annual State/Local Government Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA) (Renewal).

The total annual capital/startup and O&M costs to the regulated entities are \$149,136.

The average annual Agency burden and cost over next three years is estimated to be 574 labor hours at a cost of \$25,480. See below Table 2: Annual Agency Burden for the NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA) (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 1a/b and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual hours are 9,975. Details regarding these estimates may be found below in Table 1a: Annual Private Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA) (Renewal) and Table 1b: Annual State/Local Government Respondent Burden and Cost

of Recordkeeping and Reporting Requirements for the NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 1,108 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$149,136.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 574 labor hours at a cost of \$25,480. See below Table 2: Annual Agency Burden for the NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA) (Renewal).

6(f) Reasons for Change in Burden

The adjustment decrease in burden from the most recently approved ICR is an adjustment due to a decrease in the number of respondents, from three to two. Small units at one location were replaced with large units, which are not subject to this rule.

Capital/startup and O&M costs [section 6(b)(iii)] also decreased compared to the previous ICR. The previous ICR has identical capital/startup costs, but this ICR has lower O&M costs. The decrease is attributed to the fact that one less unit is operating.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 1,108 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-2009-0383. An electronic version of the public docket is available at <http://www.regulations.gov> and 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 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) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0383 and OMB Control Number 2060-0423 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 1a. Annual Private Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA) (Renewal)

Burden Item		(A) Respondent Hours Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Person Hours Per Respondent Per Year (C=AxB)	(D) Number of Respondents Per Year	(E) Technical Hours Per Year (E=CxD)	(F) Management Hours Per Year (F=Ex0.05)	(G) Clerical Hours Per Year (G=Ex0.1)	(H) Total Hours Per Year (H=E+F+ G)	(I) Total Cost Per Year
1	Applications	Not applicable								
2	Surveys and Studies	Not applicable								
3	Reporting Requirements									
	A. Read and Understand Rule Requirements	40	1	40	1	40	2	4	46	\$4,326.18
	B. Required Activities									
	1) Initial performance tests and reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	775	1	775	1	775	38.75	77.50	891.25	\$83,819.74
	2) CEMS demonstration (SO ₂ , NO _x , opacity, CO, CO ₂ , O ₂)									
	a) Installation of CEM units	225	1	225	1	225	11.25	22.50	258.75	\$24,334.76
	b) Initial demonstration	450	1	450	1	450	22.50	45	517.50	\$48,669.53
	3) Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	775	1	775	1	775	38.75	77.50	891.25	\$83,819.74
	4) Quarterly Appendix F audits of CEMS (SO ₂ , NO _x , CO)									
	a) RATA audit (one per year)	350	1.86	651	1	651	32.55	65.10	748.65	\$70,408.58
	b) RAA audit (three per year)	130	5.58	725.40	1	725.40	36.27	72.54	834.21	\$78,455.27
	c) Daily calibration and operation	1	678.90	678.90	1	678.90	33.95	67.89	780.74	\$73,426.09
	C. Create Information	Included in 3.B								
	D. Gather Information	Included in 3.E								
	E. Report Preparation									
	1) Plant startup									
	a) Preliminary and final material separation plans and siting analysis	270	1	270	1	270	13.50	27.00	310.50	\$29,201.72
	b) Public meeting and comment response	140	1	140	1	140	7	14.00	161	\$15,141.63
	c) Notification of construction	2	1	2	1	2	0.10	0.20	2.30	\$216.31
	d) Notification of startup	2	1	2	1	2	0.10	0.20	2.30	\$216.31

Burden Item		(A) Respondent Hours Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Person Hours Per Respondent Per Year (C=AxB)	(D) Number of Respondents Per Year	(E) Technical Hours Per Year (E=CxD)	(F) Management Hours Per Year (F=Ex0.05)	(G) Clerical Hours Per Year (G=Ex0.1)	(H) Total Hours Per Year (H=E+F+ G)	(I) Total Cost Per Year
	2) Notification of initial performance tests	4	1	4	1	4	0.20	0.40	4.60	\$432.62
	3) Initial compliance reports	40	1	40	1	40	2	4.00	46	\$4,326.18
	4) Notification of CEMS demonstration	4	1	4	1	4	0.20	0.40	4.60	\$432.62
	5) Initial CEMS demonstration report	40	1	40	1	40	2	4.00	46	\$4,326.18
	6) Annual compliance reports	40	1.86	74.40	1	74.40	3.72	7.44	85.56	\$8,046.69
	7) Semi-annual excess emission reports	40	2	80	0.5	40	2	4.00	46	\$4,326.18
	Subtotal - Reporting Requirements								5,677.21	\$533,926.3 2
4	Recordkeeping Requirements									
	A. Read Instructions	Included in 3.A								
	B. Plan Activities	Included in 3.B								
	C. Implement Activities	Included in 3.B								
	D. Develop Record System	Not applicable								
	E. Record information									
	1) Record startups, shutdowns, and malfunctions	4	47	188	1	188	9.40	18.80	216.20	\$20,333.05
	2) Records of all emission rates, computations, tests	4	47	188	1	188	9.40	18.80	216.20	\$20,333.05
	3) Records of employee review of operations manual	4	1	4	1	4	0.20	0.40	4.60	\$432.62
	4) Record amount of sorbent used for Hg and dioxin/furan control	4	4	16	1	16	0.80	1.60	18.40	\$1,730.47
	F. Personnel Training	Not applicable								
	G. Time for audits	Not applicable								
	Subtotal - Recordkeeping Requirements								455.40	\$42,829.18
TOTAL LABOR BURDEN AND COST:									6,133 (Rounded)	\$576,756 (Rounded)

Table 1b. Annual State/Local Government Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA) (Renewal)

Burden Item		(A) Respondent Hours Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Person Hours Per Respondent Per Year (C=AxB)	(D) Number of Respondents Per Year	(E) Technical Hours Per Year (E=CxD)	(F) Management Hours Per Year (F=Ex0.05)	(G) Clerical Hours Per Year (G=Ex0.1)	(H) Total Hours Per Year (H=E+F+ G)	(I) Total Cost Per Year
1	Applications	Not applicable								
2	Surveys and Studies	Not applicable								
3	Reporting Requirements									
	A. Read and Understand Rule Requirements	40	1	40	0	0	0	0	0	\$0.00
	B. Required Activities									
	1) Initial performance tests and reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	775	1	775	0	0	0.00	0.00	0.00	\$0.00
	2) CEMS demonstration (SO ₂ , NO _x , opacity, CO, CO ₂ , O ₂)									
	a) Installation of CEM units	225	1	225	0	0	0.00	0.00	0.00	\$0.00
	b) Initial demonstration	450	1	450	0	0	0.00	0	0.00	\$0.00
	3) Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	775	1	775	1	775	38.75	77.50	891.25	\$83,819.74
	4) Quarterly Appendix F audits of CEMS (SO ₂ , NO _x , CO)									
	a) RATA audit (one per year)	350	1.86	651	1	651	32.55	65.10	748.65	\$70,408.58
	b) RAA audit (three per year)	130	5.58	725.40	1	725.40	36.27	72.54	834.21	\$78,455.27
	c) Daily calibration and operation	1	678.90	678.90	1	678.90	33.95	67.89	780.74	\$73,426.09
	C. Create Information	Included in 3.B								
	D. Gather Information	Included in 3.E								
	E. Report Preparation									
	1) Plant startup									
	a) Preliminary and final material separation plans and siting analysis	270	1	270	0	0	0	0	0	\$0.00
	b) Public meeting and comment response	140	1	140	0	0	0	0	0	\$0.00
	c) Notification of construction	2	1	2	0	0	0	0	0	\$0.00
	d) Notification of startup	2	1	2	0	0	0	0	0	\$0.00

Burden Item		(A) Respondent Hours Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Person Hours Per Respondent Per Year (C=AxB)	(D) Number of Respondents Per Year	(E) Technical Hours Per Year (E=CxD)	(F) Management Hours Per Year (F=Ex0.05)	(G) Clerical Hours Per Year (G=Ex0.1)	(H) Total Hours Per Year (H=E+F+ G)	(I) Total Cost Per Year
	2) Notification of initial performance tests	4	1	4	0	0	0	0	\$0.00	
	3) Initial compliance reports	40	1	40	0	0	0	0	\$0.00	
	4) Notification of CEMS demonstration	4	1	4	0	0	0	0	\$0.00	
	5) Initial CEMS demonstration report	40	1	40	0	0	0	0	\$0.00	
	6) Annual compliance reports	40	1.86	74.40	1	74.40	3.72	7.44	\$8,046.69	
	7) Semi-annual excess emission reports	40	2	80	0.5	40	2	4.00	\$4,326.18	
	Subtotal - Reporting Requirements							3,386.41	\$318,482.56	
4	Recordkeeping Requirements									
	A. Read Instructions	Included in 3.A								
	B. Plan Activities	Included in 3.B								
	C. Implement Activities	Included in 3.B								
	D. Develop Record System	Not applicable								
	E. Record information									
	1) Record startups, shutdowns, and malfunctions	4	47	188	1	188	9.40	18.80	\$20,333.05	
	2) Records of all emission rates, computations, tests	4	47	188	1	188	9.40	18.80	\$20,333.05	
	3) Records of employee review of operations manual	4	1	4	1	4	0.20	0.40	\$432.62	
	4) Record amount of sorbent used for Hg and dioxin/furan control	4	4	16	1	16	0.80	1.60	\$1,730.47	
	F. Personnel Training	Not applicable								
	G. Time for audits	Not applicable								
	Subtotal - Recordkeeping Requirements							455.40	\$42,829.18	
	TOTAL LABOR BURDEN AND COST:							3,842 (Rounded)	\$361,312 (Rounded)	

ASSUMPTIONS

- Assumes four existing affected facilities at two plants.
- Assumes one additional new private facility/respondent will become subject to the standard over the next three years.
- The number of respondents averaged over the three-year ICR cycle is estimated to be 2 (Rounded).

- There are an average of 1.86 affected facilities (i.e., sources or units) per respondent [4.33 facilities at 2.33 plants = 1.86 (Rounded)].
- Relative accuracy test audits (RATA) occur once per year for each affected facility ($1 \times 1.86 = 1.86$).
- Relative accuracy audits (RAA) occur three times per year for each affected facility ($3 \times 1.86 = 5.58$).
- Daily calibration and operation data occurs daily ($365 \times 1.86 = 678.90$).
- Costs are based on the following hourly rates: technical at \$97.59, management at \$114.77, and clerical at \$48.26.
- RATA audits are performed for one of the four quarterly audits. RAA tests are performed for three of the four quarterly audits. Audits of the diluent monitor (O_2 or CO_2) are not required because tests on SO_2 and CO monitors will incorporate the use of the diluent monitor.
- Assumes 47 weeks of operation (90 percent availability) per year per facility.
- Assumes one source has a facility with excess emissions and must submit two semiannual reports.

Table 2. Annual Agency Burden for the NSPS for Small Municipal Waste Combustors (40 CFR part 60, subpart AAAA) (Renewal)

		(A)	(B)	(C)	(D)	(E)	(F)	(G)
Burden Item		Number of Occurrences Per Year	EPA Person Hours Per Occurrence	Tech Hours Per Year (C=AxB)	Management Hours Per Year (D=Cx0.05)	Clerical Hours Per Year (E=Cx0.1)	Total Hours Per Year (F=C+D+E)	EPA Cost Per Year
1	Applications	not applicable						
2	Read and Understand Rule Requirements	0	40	0	0	0	0	\$0
	A. Create Information	0	0	0	0	0	0	\$0
	B. Gather Information	0	0	0	0	0	0	\$0
	C. Report Reviews							
	1) Review preliminary and final material separation plans and siting analysis	1	8	8	0.40	0.80	9.20	\$408.42
	2) Review notification of construction	1	2	2	0.10	0.20	2.30	\$102.10
	3) Review notification of startup	1	2	2	0.10	0.20	2.30	\$102.10
	4) Review notification of initial performance test	1	8	8	0.40	0.80	9.20	\$408.42
	5) Review notification of initial CEMS demonstration	1	4	4	0.20	0.40	4.60	\$204.21
	6) Review initial performance test report	1	40	40	2	4	46	\$2,042.08
	7) Review initial CEMS demonstration report	1	40	40	2	4	46	\$2,042.08
	8) Review annual compliance report	2.33	70	163.10	8.16	16.31	187.57	\$8,326.58
	9) Review semi-annual excess emission report	2	16	32	1.60	3.20	36.80	\$1,633.66
	D. Prepare annual summary report	1	200	200	10	20	230	\$10,210.40
TOTAL ANNUAL BURDEN AND COST:							574 (Rounded)	\$25,480 (Rounded)

ASSUMPTIONS

- Agency estimated labor rates are: technical at \$45.52, management at \$61.36, clerical at \$24.64.
- Assumes four affected facilities at two plants.
- Assumes one additional facility/respondent over the next three years.
- The number of respondents averaged over the three-year ICR cycle is estimated to be 2.33.

- Assumes one source has a facility with excess emissions and must submit two semiannual reports.