

**SUPPORTING STATEMENT
FOR OMB REVIEW OF EPA ICR No. 2362.01 (OMB Control Number 2060-NEW):
INFORMATION COLLECTION EFFORT FOR NEW AND EXISTING COAL- AND
OIL-FIRED ELECTRIC UTILITY STEAM GENERATING UNITS**

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SUPPORTING STATEMENT PART A

Part A of the Supporting Statement

1. Identification of the Information Collection

(a) *Title of the Information Collection*

“Information Collection Effort for New and Existing Coal- and Oil-fired Electric Utility Steam Generating Units.” This is a new information collection request (EPA ICR Number 2362.01 and OMB Control Number 2060-NEW).

(b) *Short Characterization*

This information collection is being conducted by EPA’s Office of Air and Radiation (OAR) to assist the EPA Administrator, as required by section 112(d) of the Clean Air Act, as amended (CAA), to develop an emission standard for this source category. CAA section 112(a)(8) defines an electric utility steam generating unit as

. . . any fossil fuel-fired combustion unit of more than 25 megawatts that serves a generator that produces electricity for sale. A unit that cogenerates steam and electricity and supplies more than one-third of its potential electric output capacity and more than 25 MWe output to any utility power distribution system for sale is also considered a utility unit.

The information from this ICR would also be made available to the public.

Currently, information necessary to identify all coal- and oil-fired electric utility units is publicly available for facilities owned and operated by publicly-owned utility companies, Federal power agencies, rural electric cooperatives, investor-owned utility generating companies, and nonutility generators (such units include, but may not be limited to, independent power producers (IPPs), qualifying facilities, and combined heat and power (CHP) units). However, the most recent data available are for 2005. Also, information on a unit’s permitted emission limits, and monitoring, recordkeeping, and reporting requirements for all HAP emissions are not available from any single source. This information may have been previously recorded in both Federal Title V permits and in certain State’s emissions permits if control of HAP is required. Additionally, there are no readily available sources for coal- and oil-fired electric utility steam generating units of fuel amounts received, fuel sources, fuel shipment methods, and results from previously conducted fuel analyses for each individual coal and oil shipment received during the preceding 12 months before this ICR, or for any previously conducted (since January 01, 2005)

emissions test results that will provide data for emissions of a variety of pollutants, including: particulate matter (PM), particulate matter smaller than 2.5 microns (PM_{2.5}), sulfur dioxide (SO₂), hydrogen chloride/hydrogen fluoride/hydrogen cyanide (HCl/HF/HCN), metal HAP (including compounds of antimony (Sb), arsenic (As), beryllium (Be), cadmium (Cd), chromium (Cr), cobalt (Co), lead (Pb), manganese (Mn), and selenium (Se)), mercury (Hg), total organic hydrocarbons (THC), volatile organic compounds (VOC), and carbon monoxide (CO).

To obtain the information, this information collection contains two components. The first component is soliciting information, under authority of CAA section 114, from all potentially affected units. EPA intends to provide the survey in electronic format; however, written responses will also be accepted. The survey will be submitted to all coal- and oil-fired electric utility steam generating facilities listed in the 2007 version of the Department of Energy's (DOE) Energy Information Administration's (EIA) Forms 860 and 923, "Annual Electric Generator Report," and "Power Plant Operations Report," respectively.

The second component is requiring, again through the issuance of a letter pursuant to the authority of CAA section 114, the owners/operators of a limited number of coal-and oil-fired electric utility steam generating units to conduct stack testing in accordance with an EPA-approved protocol. Units selected to be tested will be identified through factors believed to place them among the top performing 15 percent of sources in the coal and oil subcategories of electric utility steam generating units, and from among any further potential subcategories, based on the currently available data. Coal-fired units to be tested will also be selected to cover three potential categories of HAP that may be addressed through the use of surrogates. These potential categories of HAP are mercury and non-mercury metallic HAP (e.g., As, Pb, Se), acid gas HAP (e.g., HCl, HF, HCN), and non-dioxin/furan organic HAP. Fifty coal-fired units each will also be selected at random from the entire population of coal-fired EGUs; these 50 units will be required to test for dioxin/furan organic HAP. An additional 50 coal-fired units will be selected at random from among those units not selected as being "top performing" units to represent those coal-fired units not comprising the top-performing units; these 50 randomly selected units will be required to test for all HAP except dioxin/furan organic HAP. Data from this last grouping will be used to assess the impact of the standards. Oil-fired units to be tested will also be selected to cover the same three potential categories of HAP noted above that may be addressed through the use of surrogates as well as the dioxin/furan organic HAP. The testing is to consist of three runs

at the sampling location and is to be in accordance with a specified emission test method. The owner/operator of each selected electric utility steam generating unit will also be required to collect and analyze, in accordance with an acceptable procedure, three fuel samples from the fuel fed to the boiler during each stack test. The results of the stack tests and the fuel analyses will again be required to be submitted to the EPA. Owner/operators of oil-fired units and of coal-fired units selected for testing for dioxin/furan organic HAP and chosen to represent those coal-fired units not comprising the top-performing units may offer for EPA approval alternative units for testing as long as the potential substitution unit is of similar size and type, fires a similar coal, and has similar control equipment.

EPA estimates the cost of the gathering, entering, and quality assuring (QA) of data submitted in response to the survey will be 100,802 hours and \$9,534,450; and the cost of the stack testing and fuel sampling component to be 24,296 hours and \$66,438,308, for a total cost of \$75,972,758. In developing the cost totals for gathering, entering, and quality assuring the data submitted in response to the survey, EPA estimated costs assuming 45 and 65 hours to complete these tasks. The difference in the total cost between the 2 separate estimates was an additional \$2,897,731. To address concerns raised by commenters, EPA used 65 hours in its total cost estimate above.

The owner/operator of each coal- and oil-fired electric utility steam generating unit is required to enter all data through the web site data collection tool, enter these data using proper unit terminology, and to QA/QC the data entered into the web site.

The owner/operator of each coal- and oil-fired electric utility steam generating unit required to conduct stack testing and concurrent fuel sampling and analysis will be required to keep records: i) documenting that fuel samples taken during each stack test run were obtained in accordance with an approved sampling protocol; ii) establishing proper chain of custody for each fuel sample; iii) describing the QA/QC procedures followed in preparing each fuel sample for analysis and performing the required analysis; iv) setting forth the results of the analyses performed on each fuel sample; v) documenting that each stack test was conducted in accordance with an approved testing protocol; and, vi) setting forth the results of each stack test.

All records required under the proposed information collection must be retained for 3 years.

2. Need for and Use of the Collection

(a) Need/Authority for the Collection

The Agency acquired unit-specific data and data on mercury from coal-fired units in an ICR approved on November 13, 1998 (OMB Control No. 2060-0396; “1999 ICR”). These data were gathered in advance, and in support, of the December 20, 2000, regulatory finding (65 FR 79825). Using these and other data, on May 18, 2005 (70 FR 28606), EPA promulgated the Clean Air Mercury Rule (CAMR) establishing emission limits under CAA section 111. In addition, on March 29, 2005 (70 FR 15994), EPA published a notice revising its December 2000 determination that regulation of coal- and oil-fired electric utility steam generating units under CAA section 112 was appropriate and necessary (Section 112(n) Revision Rule). On February 08, 2008, the U.S. Court of Appeals for the District of Columbia Circuit vacated the Section 112(n) Revision Rule. As a part of the decision, the Court also vacated CAMR, reverting to the December 2000 regulatory determination and requiring the development of emission standards under CAA section 112 (maximum achievable control technology, or MACT, standard) for coal- and oil-fired electric utility steam generating units. EPA subsequently asked the Court for a rehearing, which was denied. The Department of Justice (DOJ), at EPA’s request, filed a petition for certiorari with the Supreme Court on November 17, 2008; on January 29, 2009, EPA requested of the DOJ that the petition be withdrawn. On December 20, 2008, EPA was sued by several environmental and health organizations for failing to meet a mandatory duty under CAA section 112 to set emission standards for coal- and oil-fired power plants by December 20, 2002. On October 28, 2009, pursuant to CAA section 113(g), EPA published in the *Federal Register* for comment a proposed Consent Decree to resolve the litigation. The proposed Consent Decree would require the Agency to propose CAA section 112(d) standards by March 16, 2011, and issue final CAA section 112(d) standards by November 16, 2011.

The originally collected data (through the 1999 ICR) are now over 10 years old and address only coal-fired electric utility steam generating units and only mercury emissions from such units. The Agency is aware that significant changes have been made in the intervening years in the number of operating coal- and oil-fired units, in industry ownership practices, and in emission control configurations. Further, in light of the statutory requirements for establishing emission standards under CAA section 112(d) and the recent case law interpreting those requirements, the Agency believes that it needs additional data from both coal- and oil-fired

electric utility steam generating units. Therefore, the Agency has concluded that obtaining updated information will be crucial to informing its decision on the national emission standards for hazardous air pollutants (NESHAP) for coal- and oil-fired electric utility steam generating units.

CAA 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.

(b) Use/Users of the Data

The data collected will be used to revise the population of potentially affected coal- and oil-fired electric utility steam generating units and update existing facility information and configuration, existing permit emission limits for the data, required monitoring and recordkeeping data for permitted HAP, and gather fuel analysis information and HAP emission data. These data will be used by the Agency to develop NESHAP for coal- and oil-fired electric utility steam generating units under CAA section 112. Specifically, the data will respond in part to the data needs noted in Section 2(a), providing the Agency with updated information on the number of potentially affected units, available emission test data, and fuel analysis data to establish NESHAP and to address variability.

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

(a) Non-duplication

The Agency recognized that some of the information requested in the information collection effort may already be included in the submittals made by individual companies, pursuant to State and national emission inventories, operating permits applications, and initial notification forms. However, the complete extent of the data fields requested under this survey is not available in a consistent and usable format. Additionally, none of these three sources provide any data on fuel analyses or emission test results. Although some State permits are

provided to the public as searchable portable document format files (pdfs), many States do not provide electronic versions of their issued Title V permits. Even when the permit is available, often the unit-specific fuel and operating data are unavailable. Some of the initial notifications submitted are available in hard-copy only, whereas only the facility-level information (facility name, location, contact) is available in an electronic format. Other than the emission test data submitted prior to the compliance date, information requested pursuant to the unit design and operations, fuel analyses emissions data, and effectiveness of various control devices at removing HAP is not believed to be available from other sources and, therefore, will be used to supplement the information which may currently be available from other sources.

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

This ICR was submitted for public review on July 2, 2009 (74 FR 31725) as required by the Paperwork Reduction Act of 1995 (PRA) and the subsequent rule issued by the Office of Management and Budget (OMB) on August 29, 1995 (60 FR 44978). EPA addressed the public comments received, and submitted the ICR to OMB on November 10, 2009 (74 FR 58012). EPA's responses to all public comments received are contained in the respective Response to Comments documents for the subject *Federal Register* notices; these documents may be found in the docket (EPA-HQ-OAR-2009-0234).

(c) Consultations

No representatives of Federal or State agencies were consulted at this time. Two meetings were held with representatives of trade associations and individual companies. An opportunity for additional comment was provided by the *Federal Register* notice concerning the submittal of the ICR to OMB.

(d) Effects of Less Frequent Collection

This ICR will require the owner/operator of each facility at which a potentially affected coal- and oil-fired electric utility steam generating unit is located to complete a survey of the unit design, operations, fuel consumption, available fuel analysis and emissions data. This ICR will also require that the most recent 12 months of fuel analysis data (where that data contain information on chloride and HAP metal content) and emissions test data for all tests conducted since January 01, 2005, be submitted. In addition, this ICR will require that a number of coal- and oil-fired electric utility steam generating units conduct stack testing. EPA expects the information requested in this survey to be a one-time effort.

(e) *General Guidelines*

This ICR will adhere to the guidelines for Federal data requestors, as provided at 5 CFR 1320.6.

(f) *Confidentiality*

Respondents will be required to respond under the authority of CAA section 114. If a respondent believes that disclosure of certain information requested would compromise a trade secret, it should be clearly identified as such and will be treated as confidential until and unless it is determined in accordance with established EPA procedure as set forth in 40 CFR Part 2 not to be entitled to confidential treatment. All 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 (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979). Any information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. 1905. If no claim of confidentiality accompanies the information when it is received by EPA, it may be made available to the public without further notice (40 CFR 2.203, September 1, 1976). Because CAA section 114(c) exempts emission data from claims of confidentiality, the emission data provided will be made available to the public. Therefore, emissions data should not be marked confidential. A definition of what EPA considers emissions data is provided in 40 CFR 2.301(a)(2)(i).

Additionally, the planned electronic questionnaire will be stored on a secure server which will ensure that all data provided is encrypted.

(g) *Sensitive questions*

This section is not applicable because this ICR will not involve matter of a sensitive nature.

4. The Respondents and the Information Requested

(a) *Respondents/NAICS Codes.*

Respondents affected by this action are owners/operators of coal- and oil-fired electric utility steam generating units as defined in CAA section 112(a)(8) as noted earlier. Natural gas-fired electric utility steam generating units are not affected by this action. For the purposes of this information collection, “coal” includes anthracite, bituminous, subbituminous, lignite, and

coal refuse (generally termed culm and gob bit also including subbituminous refuse); and “oil” includes distillate, residual, and bunker oils along with petroleum coke.

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

Category		NAICS Code
Industry	Fossil Fuel Electric Power Generation	221112
Federal/State/local government	Electric Power Distribution	221122
Tribal government	American Indian and Alaska Native Tribal Governments	921150

(b) Information Collected

(i) Data Items. The proposed emissions data gathering effort has two components: i) confirmation of certain information from all coal- and oil-fired units; and ii) stack testing. In the first component, each owner/operator of each affected unit will be required to complete a survey that will have the following components: identification and confirmation of existing unit, the unit design, operations, fuel consumption, available fuel analysis and emissions data. This ICR will require that the most recent 12 months of fuel analysis data (where that data contain information on chloride and HAP metal content) and emissions test data for all tests conducted since January 01, 2005, be submitted. This will apply to all coal- and oil-fired electric utility steam generating units meeting the definition of “electric utility steam generating unit” in CAA section 112(a)(8) and facilities designated as major or area sources of HAP in their Title V permits that have a coal- and/or oil-fired electric utility steam generating unit meeting the definition in CAA section 112(a)(8) listed as one of their emission sources. The draft questionnaire content can be found in Attachment 1. The survey will require each facility with potentially affected units to provide information to the Agency within 90 days of the receipt of the CAA section 114 letter that allows for identification and categorization of the units based on unit design and operations, fuel type, and/or boiler design. The survey will also require the most recent 12 months of fuel analysis data (where that data contain information on chloride and HAP metal content) and emissions test data for all tests conducted since January 01, 2005. The Agency is requiring emissions test data for all HAP and HAP surrogates including, but not limited to: PM, PM_{2.5}, SO₂, HCl, HF, metal HAP, Hg, THC, VOC, and CO.

The second component, stack testing, will require triplicate sampling with a specified emission test method at a point representing the flue gas stream as it enters the atmosphere. This

sampling will be done on one occasion. During the stack testing, collection and analyses of three as-fired fuel samples taken at intervals throughout the testing period will be required. The results of each series of stack tests and fuel sample analyses will be required to be reported to the EPA by using a specified standardized electronic format within 6 to 8 months of the receipt of the CAA section 114 letter. Specified QA/QC procedures will be required for each part of the emissions data collection effort.

For this effort, EPA believes it is highly advisable for each facility subject to emissions testing under Part III of the ICR to devise a quality assurance test plan that is specific to each facility. Such a plan could include the project elements as enumerated in chapter 3 of the EPA quality assurance document. The existence of such a plan would provide a means to verify that the quality assurance protocols as contained in the various test methods are met. Note, however, that these quality assurance test plans will not be reviewed or approved by EPA.

(ii) *Respondent Activities.* The activities a respondent must undertake to fulfill the requirements of the information collection are presented in Attachment 2. These include: i) read instructions; ii) provide source, permit, emission, etc., information (e.g., gather existing reports with requested data for each affected source, extract requested data from reports, enter extracted data into Web Site, and perform quality checks on data entered into the Web Site); iii) procure a stack test contractor and review proposal (if one of the units was selected for stack testing); iv) conduct fuel sampling (if one of the units was selected for stack testing); v) conduct stack testing (if one of the units was selected); vi) monitor stack testing (if one of the units was selected); vii) review stack sampling data for accuracy and completeness (if one of the units was selected); and viii) submit stack sampling data (if one of the units was selected).

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

(a) Agency Activities

A list of activities required of the EPA is provided in Attachment 3. These include: i) develop questionnaire; ii) develop and deploy web site for data entry from facilities, iii) mail out questionnaire, iv) answer respondent questions, v) analyze requests for confidentiality, vi) review and analyze Part I responses; vii) develop generic QAPP; viii) determine sites to be emission tested; ix) review and comment on stack sampling test plans and QAPPs; x) audit stack

tests; xi) review stack sampling data for accuracy and completeness; and xii) analyze stack sampling data.

(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA will use personal computers and applicable database software. EPA will ensure the accuracy and completeness of the collected information by reviewing each submittal. The information collected pursuant to the coal- and oil-fired electric utility steam generating units' data gathering effort will be maintained in a computerized database. To better facilitate uniformity in the format of the requested data and increase the ease of database entry, standardized survey questions will be developed and distributed to respondents.

(c) Small Entity Flexibility

All respondents required to comply with the coal- and oil-fired electric utility steam generating units' data gathering effort will be subject to the same requirements. EPA expects that a portion of the respondents may be small entities; however, any individual small entity would be expected to receive only one CAA section 114 letter so their response burden will be minimized. The Agency also plans to use an electronic format of the questionnaire in order to reduce the burden and improve the data accuracy from all respondents, including small entities. In addition, the survey will contain a question to determine the small entity status of a facility. This question will help to identify, quantify, and minimize the burden on small entities during the revised rulemaking process.

(d) Collection Schedule

EPA anticipates issuing the first CAA section 114 letters in late 2009. These CAA section 114 letters will require the owner/operator of each coal- and oil-fired electric utility steam generating units' data gathering effort to complete the survey within 90 days of receipt of the survey. EPA will compile and analyze survey response data. The owner/operator of each of the electric utility steam generating units selected to conduct emission testing will, in the same letter, be required to: i) submit to EPA for approval any additions and modifications to the QAPP supplied by EPA and a schedule for completing the required stack testing and fuel sampling and analysis, ii) commence stack testing, including concurrent fuel sampling and analysis, by the date specified in the EPA approved facility-specific schedule; and iii) complete

stack testing and concurrent fuel sampling and analysis within 6 to 8 months of receipt of the CAA section 114 letter.

(e) Estimating Respondent Costs

Attachments 2 and 3 present estimated costs for the required data collection activities. Labor rates and associated costs are based on Bureau of Labor Statistics (BLS) data. Technical, management, and clerical average hourly rates for private industry workers and were taken from the United States Department of Labor, Bureau of Labor Statistics, September 2009, "Table 2. Civilian Workers, by occupational and industry group," available at www.bls.gov/news.release/ecec.t02.htm. Wages for occupational groups are used as the basis for the labor rates with a total compensation of \$46.76 per hour for technical, \$54.52 per hour for managerial, and \$23.11 per hour for clerical. These rates represent salaries plus fringe benefits and do not include the cost of overhead. An overhead rate of 110 percent is used to account for these costs. The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$98.20, management at \$114.49, and clerical at \$48.53.

(f) Estimating Agency Burden and Costs

The costs the Federal Government would incur are presented in Attachment 3. The Agency labor rates are from the Office of Personnel Management (OPM) 2009 General Schedule which excludes locality rates of pay. These rates can be obtained from Salary Table 2009-GS, available on the OPM website at www.opm.gov/oca/09tables/html/gs_h.asp. The government employee labor rates are \$16.04 per hour for clerical (GS-7, Step 1), \$33.84 for technical (GS-13, Step 1), and \$47.03 for managerial (GS-15, Step 1). These rates were increased by 60 percent to include fringe benefits and overhead. The fully-burdened wage rates used to represent Agency labor costs are: clerical at \$25.66, technical at \$54.14, and managerial at \$75.25.

(g) Estimating the Respondent Universe and Total Burden and Costs

The potential respondent universe consists of coal- and oil-fired utility facilities meeting the CAA section 112(a)(8) definition of "electric utility steam generating unit." There are approximately 1,332 coal- and oil-fired publicly-owned units, Federal power agencies, rural electric cooperatives, and investor-owned utilities located at 537 facilities (or sites). All of these units will be required to complete the first component of the ICR (i.e., the survey). Note that it is common for more than one unit to be located at a facility. The second component (i.e., the required emission testing) will have 512 (nominal) respondents.

(h) *Bottom Line Burden Hours and Costs Tables*

(i) *Respondent tally.* The bottom line industry burden hours and costs, presented in Attachment 2, are calculated by summing the person-hours column and by summing the cost column. The burden and cost to the industry is 125,098 hours and \$75,972,758.

(ii) *Agency tally.* The bottom line Agency burden and cost, presented in Attachment 3 is calculated in the same manner as the industry burden and cost. The estimated burden and cost are 11,825 hours and \$630,248, which includes \$8,423 in O&M costs to send certified CAA section 114 letters to all respondents with electronic return receipt, questionnaire printing costs, and computer storage of data received through the web site.

(iii) *The complex collection.* This ICR is a simple collection; therefore, this section does not apply.

(iv) *Variations in the annual bottom line.* This section does not apply as this is a one-time collection.

(i) *Reasons for Change in Burden*

This is a new information collection conducted by EPA's Office of Air and Radiation (OAR) to assist the Administrator of EPA to determine the current population of affected coal- and oil-fired electric utility steam generating units and to develop emission standards for this source category as required by CAA section 112(d). The original burden estimates have changed as a result of comments received and EPA's actions to respond to the issues raised in some of those comments.

(j) *Burden Statement*

The total burden for the coal- and oil-fired electric utility steam generating units' data gathering effort is estimated to be 125,098 hours and \$75,972,758 (103 hours and \$82,485 per respondent for approximately 1,332 units).

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 currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

SUPPORTING STATEMENT PART B

See separate document.

List of Attachments

1. Draft Questionnaire Content
2. Industry Burden and Costs for Responding to the Questionnaire
3. Agency Burden and Costs
4. List of coal-fired electric utility steam generating units requiring Part I and II Information
5. List of oil-fired electric utility steam generating units requiring Part I and II Information
6. List of all IGCC units requiring Part I, II, and III Information and selected for HCl/HF/HCN acid gas HAP, dioxin/furan organic HAP, non dioxin/furan organic HAP, and mercury and other non-mercury metallic HAP testing
7. List of all petroleum coke-fired units requiring Part I, II, and III Information and selected for HCl/HF/HCN acid gas HAP, dioxin/furan organic HAP, non dioxin/furan organic HAP, and mercury and other non-mercury metallic HAP testing
8. List of coal-fired electric utility steam generating units selected for HCl/HF/HCN acid gas HAP testing
9. List of coal-fired electric utility steam generating units selected for dioxin/furan organic HAP testing
10. List of coal-fired electric utility steam generating units selected for non-dioxin/furan organic HAP testing
11. List of coal-fired electric utility steam generating units selected for mercury and other non-mercury metallic HAP testing
12. List of all oil-fired electric utility steam generating units selected for HCl/HF/HCN acid gas HAP, dioxin/furan organic HAP, non dioxin/furan organic HAP, and mercury and other non-mercury metallic HAP testing
13. List of 50 additional coal-fired electric utility steam generating units not chosen in Attachments 8 through 11 selected for HCl/HF/HCN acid gas HAP, non dioxin/furan organic HAP, and mercury and other non-mercury metallic HAP testing"

Attachment 1.

Draft Questionnaire Content

See separate document.

Attachment 2.

Industry Burden and Costs for Responding to the Questionnaire

Activity	(A) Hours per Occurrence	(B) Occurrences/ Respondent/ Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)*	(G) Clerical Hours/Year (E x 0.10)	(F) Cost/ Year
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS (Not Applicable)								
4. REPORT REQUIREMENTS								
A. Read Instructions								
Facility	2	1	2	537	1,074.0	53.7	107.4	\$116,823
B. Required Activities								
Gather existing reports with requested data	14	1	14	1332	18,648.0	932.4	1,864.8	\$2,028,412
Extract requested data from reports	14	1	14	1332	18,648.0	932.4	1,864.8	\$2,028,412
Enter extracted data into Web Site	23	1	23	1332	30,636.0	1,531.8	3,063.6	\$3,332,391
QA/QC entered data on Web Site	14	1	14	1332	18,648.0	932.4	1,864.8	\$2,028,412
Read Test Plan provided by EPA for stack testing	0.7	1	0.7	300	210.0	10.5	21.0	\$22,842
Procure contractor to perform testing	20	1	20	300	6,000.0	300.0	600.0	\$652,642
Submit stack test results through the ERT	2	1	2	300	600.0	30.0	60.0	\$65,264
QA/QC entered data on Web Site	1	1	1	300	300.0	15.0	30.0	\$32,632
HCl and HF testing from coal-fired utility units (w/ and w/o FGD)* *		238						\$7,711,200
Dioxin/furan emissions from coal-fired utility units**		68						\$2,856,000

Activity		(A) Hours per Occurrence	(B) Occurrences/ Respondent/ Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)*	(G) Clerical Hours/Year (E x 0.10)	(F) Cost/ Year
	Non-Dioxin/furan emissions (CO, VOC, and THC) from coal-fired utility units**		238						\$15,761,600
	Hg and non-Hg Metallic HAP from coal-fired utility units**		238						\$15,822,240
	All HAP surrogates from oil-fired utility units**		100						\$21,908,000
	Plant personnel for testing***	16	3	48	300	14,400.0	144.0	-	\$1,430,509
	Review the Test Report Data	5	1	5	300	1,500.0	75.0	-	\$175,378
	C. Create Information (Included in 4B)								
	D. Gather Existing Information (Included in 4E)								
	E. Write Report (Not Applicable)								
5. RECORDKEEPING REQUIREMENTS (Not applicable)									
TOTAL ANNUAL LABOR BURDEN AND COST						110,664	4,957	9,476	\$75,972,758
							125,098	Hours	
ANNUAL CAPITAL COSTS (Not Applicable)									\$ -
ANNUALIZED CAPITAL COSTS (Not Applicable)									\$ -
TOTAL ANNUAL COSTS (O&M) (Not Applicable)									\$ -
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs) (Not Applicable)									\$ -

*We assumed no clerical hours and less managerial hours were needed when plant personnel were working with Contractors to conduct testing

**This is the assumed testing costs for facilities when testing is performed by a Contractor

***This assumes 3 facility technical staff over 2 days for working with the Contractor to conduct testing. All administrative work is assumed to be included in the contractor testing and no facility administrative staff is required for testing.

Attachment 3.
Agency Burden and Costs

Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Plant/Year	(C) EPA Hours/ Plant/Year (A x B)	(D) Plants/ Year	(E) EPA Technical Hours/ Year (C x D)	(F) EPA Managerial Hours/Year	(G) EPA Clerical Hours/Year	(H) Cost, \$
Develop questionnaire	80	1	80	1	80.0	4.0	8.0	\$ 4,838
Develop web site for data entry from facilities	120	1	120	1	120.0	6.0	12.0	\$ 7,257
Mail out Questionnaire	4	1	4	537	2,148.0	107.4	214.8	\$ 129,896
Answer respondent questions	0.25	1	0.25	53.7	13.4	0.7	1.3	\$ 812
Analysis request for confidentiality	0.25	1	0.25	133.2	33.3	1.7	3.3	\$ 2,014
Review and Analyze responses	4	1	4	1332	5,328.0	266.4	532.8	\$ 322,199
Review the electronically submitted stack testing data	5	1	5	512	2,560.0	128.0	256.0	\$ 154,810
Total Annual Hours					10,283	514.13625	1,028	\$ 621,825
						11,825	hours	
Expenses								
Printing Questionnaire	\$ 671							
Postage to mail Questionnaire Registered Mail/Receipt	\$ 6,551							
Computer Storage of data and web interface	\$ 1,200							
Total Expenses								\$ 8,423
								\$ 630,248

We assume that EPA will mail one questionnaire to each facility.
Assumes that 10 percent of the facilities will have questions.
Assumes that 10 percent of the units will have confidential data.

Attachment 4.

List of coal-fired electric utility steam generating units requiring Part I and II Information

See separate document.

Attachment 5.

List of oil-fired electric utility steam generating units requiring Part I and II Information

See separate document.

Attachment 6.

List of all IGCC units requiring Part I, II, and III Information and selected for HCl/HF/HCN acid gas HAP, dioxin/furan organic HAP, non-dioxin/furan organic HAP, and mercury and other non-mercury metallic HAP testing

See separate document.

Attachment 7.

List of all petroleum coke-fired units requiring Part I, II, and III Information and selected for HCl/HF/HCN acid gas HAP, dioxin/furan organic HAP, non-dioxin/furan organic HAP, and mercury and other non-mercury metallic HAP testing

See separate document.

Attachment 8.

List of coal-fired electric utility steam generating units selected for HCl/HF/HCN acid gas HAP testing

See separate document.

Attachment 9.

List of coal-fired electric utility steam generating units selected for dioxin/furan organic HAP testing

See separate document.

Attachment 10.

List of coal-fired electric utility steam generating units selected for non-dioxin/furan organic HAP testing

See separate document.

Attachment 11.

List of coal-fired electric utility steam generating units selected for mercury and other non-mercury metallic HAP testing

See separate document.

Attachment 12.

List of all oil-fired electric utility steam generating units selected for HCl/HF/HCN acid gas HAP, dioxin/furan organic HAP, non-dioxin/furan organic HAP, and mercury and other non-mercury metallic HAP testing

See separate document.

Attachment 13.

List of 50 additional coal-fired electric utility steam generating units not chosen in Attachments 8 through 11 selected for HCl/HF/HCN acid gas HAP, non dioxin/furan organic HAP, and mercury and other non-mercury metallic HAP testing"

See separate document.