SUPPORTING STATEMENT

AMENDMENTS TO NEW SOURCE PERFORMANCE STANDARDS (NSPS)
FOR
COAL PREPARATION AND PROCESSING PLANTS

Part A of the Supporting Statement

1. Identification of the Information Collection

(a) Title and Number of the Information Collection.

"NSPS for Coal Preparation and Processing Plants (40 CFR Part 60, Subpart Y)." The Office of Management and Budget (OMB) has previously approved the information collection requirements for the existing rule and assigned OMB control number 2060-0122. The EPA ICR tracking number for this revision is 1062.12.

(b) Short Characterization.

Respondents who are required to perform this information collection are the owners and operators of coal preparation and processing plants that are subject to the New Source Performance Standards (NSPS) for coal preparation and processing plants in 40 CFR part 60, subpart Y. These amendments include revisions to the emission limits for particulate matter (PM) and opacity standards for thermal dryers, pneumatic coal cleaning equipment, and coal handling equipment (coal processing and conveying equipment, coal storage systems, and coal transfer and loading systems) located at coal preparation and processing plants which commence construction, modification, or reconstruction after April 28, 2008. The amendments also establish a sulfur dioxide (SO_2) emission limit and a combined nitrogen oxide (NO_x) and carbon monoxide (CO) emissions limit for thermal dryers located at coal preparation and processing plants which commence construction, modification, or reconstruction after May 27, 2009.

Affected owners and operators subject to the rule are required to install and operate air emission controls and meet certain work practice standards. Work practices are implemented on a site-specific basis according to a fugitive coal dust emissions control plan prepared by the affected owners and operators. To demonstrate initial and continuous compliance with the rule requirements, affected owners and operators need to collect information to meet specific monitoring, inspection, recordkeeping, and reporting requirements.

For affected facilities mechanically vented through a control device, respondents are required to conduct initial and subsequent emissions testing to show compliance with the applicable PM limits using EPA Method 5 of 40 CFR part 60, appendix A-4. Thereafter, subsequent Method 5 performance tests must be conducted either annually or biannually as determined by the results of the most recent Method 5 test. Similar emissions testing requirements are specified in the rule amendments using the appropriate EPA test methods for

new, reconstructed, or modified thermal coal dryers subject to the SO_2 and combined NO_x/CO emission limits.

For affected facilities subject to opacity emissions limits, respondents are required to conduct initial emissions testing to show compliance with the applicable opacity limits using EPA Method 9 of 40 CFR part 60, appendix A-4. Thereafter, subsequent Method 9 performance tests must be conducted at intervals determined by the results of the most recent Method 9 test. As an alternative to subsequent Method 9 performance testing, the rule amendments allow affected owners and operators to elect to conduct monitoring as follows: (1) monthly visual observations of process and control equipment and, if any deficiencies are observed, the necessary maintenance must be performed as expeditiously as possible; and (2) daily walkthrough observations consisting of a single 15-second observation (i.e., visible emissions or no visible emissions) of each affected facility and, if any visible emissions are observed, within 24 hours corrective actions must be conducted and the owner or operator must demonstrate that there are no visible emissions. Additional monitoring options to subsequent Method 9 performance testing available under the rule amendments that owners and operators can choose to use for an affected facility, when applicable, are installation and operation of a continuous opacity monitoring system (COMS) or a digital opacity monitoring system.

The rule amendments include separate opacity testing and monitoring requirements for coal truck dump operations. EPA determined that a different approach for Method 9 opacity performance testing is warranted due to the intermittent nature of coal truck dumping. Coal truck dump operations are subject to the same opacity limits as other coal-handling operations. The rule amendments require quarterly performance tests using an appropriate adaptation of Method 9.

Semiannually, the respondent would be required to prepare and submit to EPA a compliance report describing any periods of control device operation during which the monitored values of the specified control device operating parameters deviated from the boundaries established during the most recent performance test. For the affected facilities, respondents would be required to collect and maintain records in a logbook of the air pollution control equipment inspections and repairs, as specified in the rule.

2. Need for and Use of the Collection

(a) Need/Authority for the Collection.

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

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

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

In addition, 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.

In the Administrator's judgment, particulate emissions from coal preparation and processing plants cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS was promulgated for this source category at 40 CFR part 60, subpart Y.

(b) Use/Users of the Data.

The information collected would be used by EPA personnel to: 1) identify new, reconstructed, or modified sources at coal preparation and processing plants subject to the standards, 2) ensure that the NSPS is being properly applied; 3) identify those facilities that should be inspected; 4) identify those facilities that may benefit from compliance assistance activities; and 5) ensure that the emission control devices are being properly operated and maintained on a continuous basis to reduce PM emissions from affected coal-handling operations, and PM, SO_2, NO_x, and CO emissions from affected thermal coal dryers.

To minimize the burden, much of the information EPA needs to determine compliance would be recorded and retained on-site at the facility. Such information would be reviewed by the enforcement personnel during an inspection and would not need to be routinely reported to EPA. For situations other than when a deviation from the rule requirements has occurred, information required to be reported has been reduced to the extent practical.

3. Nonduplication, Consultations, and Other Collection Criteria

(a) Nonduplication.

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated State or local EPA. If a State or local EPA has adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the State or local EPA can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

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

This section is not applicable because this is a rule related ICR.

(c) Consultations.

During development of the rule amendments, EPA held meetings and conference calls with representatives of the following trade associations, companies, and control equipment manufacturers: Utility Air Regulatory Group (UARG), National Mining Association (NMA), American Petroleum Institute (API), Peabody Energy Corporation (formerly Peabody Coal), Benetech, Inc., and Dust Solutions, Inc. More information is available in the docket for this rulemaking.

(d) Effects of Less Frequent Collection.

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

(e) General Guidelines.

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

(f) Confidentiality.

The required information has been determined not to be confidential. However, any information submitted to EPA for which a claim of confidentiality is made will be safeguarded according to EPA policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

(g) Sensitive Questions.

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

(a) Respondents/NAICS Codes.

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

Standard (40 CFR part 60, subpart Y)	NAICS Code
Bituminous Coal and Lignite Surface Mining	212111
Bituminous Coal Underground Mining	212112
Fossil Fuel Electric Power Generation	212112
Fossil Fuel-Fired Electric Steam Generating Units in Indian Country	921150
Anthracite Mining	212113
Support Activities for Coal Mining	213113
Paper (except Newsprint) Mills	322121
Petrochemical Manufacturing	325110
All Other Petroleum and Coal Products Manufacturing	324199
Cement Manufacturing	327310
All Other Petroleum and Coal Products Manufacturing	324199
Iron and Steel Mills	331111

(b) Information Requested.

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

A source must make the following reports:

Reports for 40 CFR Part 60

	Subpart A	Subpart Y
Construction/reconstruction	60.7(a)	
Anticipated startup	60.7(a)	
Notification of actual startup	60.7(a)	
Initial performance test	60.8	
Initial performance test results	60.8	60.258(c)
Physical or operational change	60.7(a)	
Repeat performance test results	60.8	60.258(d)
Semi-Annual Excess Emission Reports	60.7(c)	60.258(b)

A source must maintain the following records:

Recordkeeping for 40 CFR Part 60

	Subpart A	Subpart Y
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	60.7(b)	
Maintain a written or electronic logbook		60.258(a)
Records are required to be retained for two (2) years	60.7(f)	
Records of ongoing monitoring	60.7(f)	
Fugitive Coal Dust Emissions Control Plan		60.254(c)
Bag Leak Detection System Site-Specific Plan		60.256(c)

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

Respondent Activities
Read instructions.
Perform initial performance test using appropriate Reference Method, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

(a) EPA Activities.

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

EPA Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, emission control plans, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the AIRS Facility Subsystem (AFS) database.
Analyze and maintain data in the WebFIRE database.

(b) Collection Methodology and Management.

Following notification of startup, EPA or delegated authority might inspect a coal preparation and processing plant to determine whether the required air pollution control devices are properly installed and operated. Performance test reports are used by EPA to determine an affected facility's initial and subsequent compliance with the applicable emissions limits. Selected data and records maintained by the respondents are tabulated for use in air compliance and enforcement programs.

Certain information contained in the reports is entered into the AIRS Facility Subsystem (AFS), which is operated and maintained by EPA's Office of Compliance, and into the WebFire database. AFS is EPA's database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for over 100,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and State regulatory agencies, EPA regional offices, and EPA headquarters. EPA and its delegated authorities can edit, store, retrieve and analyze the data. The Web Factor Information Retrieval (FIRE) Data System is a database management system containing EPA's recommended emission estimation factors for criteria and hazardous air pollutants. FIRE includes information about industries and their emitting processes, the chemicals emitted, and the emission factors themselves. FIRE allows easy access to criteria and hazardous air pollutant emission factors obtained from the Compilation of Air Pollutant Emission Factors (AP 42), Locating and Estimating (L and E) documents, and the retired AFSEF and XATEF documents.

The records required by this regulation must be retained by the owner or operator for two years.

(c) Small Entity Flexibility

There is a distribution of business sizes for the businesses that have coal preparation and processing plants. EPA is not aware of any small entities in the coal preparation and processing regulated industry. The subpart Y standards are applicable to facilities that process (i.e., break, crush, screen, clean, or dry) more than 181 megagrams (200 tons) of coal per day. Since NSPS are applicable to facilities built in the future, it is not clear if any future affected facilities would be owned by small entities. However, due to technical considerations involving the process operation and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. EPA considers these requirements

the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger business can use economies of scale to reduce their burden, the overall burden will be reduced.

(d) Collection Schedule.

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

6. Estimating the Burden and Cost of the Collection

Tables 1a, 1b, and 1c [Year 1 Respondent Burden of Reporting and Recordkeeping Requirements, NSPS for Coal Preparation and Processing plants (40 CFR part 60, subpart Y), Year 2 Respondent Burden of Reporting and Recordkeeping Requirements, NSPS for Coal Preparation and Processing Plants (40 CFR part 60, subpart Y), and Year 3 Respondent Burden of Reporting and Recordkeeping Requirements, NSPS for Coal Preparation and Processing Plants (40 CFR part 60, subpart Y)] document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR for each of the first 3 years. Table 1d contains a summary of the respondent burden costs and hours detailed in Tables 1a, 1b, and 1c.

The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

(a) Estimating Respondent Burden.

The total number of respondents was estimated using data compiled from the last 10 years of coal preparation and processing plant air permits indicating the growth of and types of equipment used by the industry. Using this information it is estimated that an additional 22 new coal preparation and processing plants will become subject to the regulation over the 5-year NSPS review period. Thus, it is estimated that there would be 14 coal preparation and processing plants subject to the rule amendments over the 3-year ICR period (22/3 = 13.2 rounded to 14). All of these 14 coal preparation and processing plants are estimated to be constructed in the first year of the 3-year ICR period. Furthermore, based on industry trends for new coal preparation and processing plants, it is assumed none of the new 14 plants will include the use of the types of coal thermal dryers or pneumatic tables subject to the rule amendments.

All 14 of the coal preparation and processing plants are assumed to consist of coal processing and conveying equipment, coal storage systems, coal transfer and loading systems, and open storage piles. The burden estimates are based on the conservative control implementation assumption that all affected owners and operators will choose to use enclosures vented to fabric filters for the affected facilities at their plants to comply with the rule. In actuality many owners and operators are expected to choose alternative controls allowed under

the rule for many affected sources, when applicable, such as fogging systems, wet suppression, and passive enclosure containment systems (PECS) that do not require Method 5 performance testing. Both Method 5 and Method 9 testing are usually conducted by a contractor such that the cost of the emissions testing is an annual operations and maintenance cost. This is assuming that no plant employs a certified smoke reader. Finally, it is assumed that 2 of the 14 coal preparation and processing plants will have the type of coal truck dump affected facilities subject to the rule amendments.

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 9,193 hours per year (Total Labor Hours from Tables 1a, 1b, and 1c). These hours are based on EPA studies and background documents from the development of the regulation, EPA knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

(b) Estimating Respondent Costs.

(i) Estimating Labor Costs. Labor rates and associated costs are based on Bureau of Labor Statistics (BLS) data. Technical, management, and clerical average hourly rates for private industry workers were taken from the United States Department of Labor, Bureau of Labor Statistics, June 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 $46.61 per hour for technical, $54.95 per hour for managerial, and $23.04 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 $97.88, management at $115.40, and clerical at $48.38.

(ii) Estimating Capital and Operations and Maintenance (O&M) Costs. The annual operations and maintenance costs associated with the information collection requirements will include the costs to conduct performance tests and purchase monitoring, recordkeeping, and reporting supplies. A third-party contractor testing cost of $7,000 for each Method 5 performance test and $1,300 for each Method 9 performance test was used. The estimated number of affected facilities times the number of total number of tests required for each affected facility per year resulted in a total capital cost of approximately $882,000 for Method 5 testing and $231,400 for Method 9 testing over the next three years. Installing bag leak detection systems for the fabric filters is included as a capital cost. The annual operation and maintenance costs associated with the purchase of monitoring, recordkeeping, and reporting supplies is $38,290 over the next three years.

(iii) Annualizing Capital Costs. The capital cost associated with procurement and installation of bag leak detection systems for the fabric filters was annualized assuming a 7 percent interest rate and 10-year life (i.e., capital recovery factor [CRF] of 0.1424). The total annualized capital costs total $674,528.

(c) Estimating EPA Burden and Cost.

Table 2a: Year 1 Burden and Cost to the EPA—NSPS for Coal Preparation and Processing Plants, Table 2b: Year 2 Burden and Cost to the EPA—NSPS for Coal Preparation and Processing Plants, and Table 2c: and Year 3 Burden and Cost to the EPA—NSPS for Coal Preparation and Processing Plants document the costs of this NSPS revision to EPA. The only costs to EPA are those costs associated with analysis of the reported information. Publication and distribution of the information are part of the AFS program. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of EPA's overall compliance and enforcement program. Table 2d contains a summary of EPA burden costs and hours detailed in Tables 2a, 2b, and 2c. The average annual EPA cost during the three years of the ICR is estimated to be $57,436.

The EPA 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-07, 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 EPA labor costs are: clerical at $25.66, technical at $54.14, and managerial at $75.25.

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

It is estimated that an additional 14 new coal preparation and processing plants will become subject to the rule amendments in the next three years. The total annual number of responses for the monitoring, recordkeeping, and reporting requirements in rule amendments is 315. This number is calculated by the 22 responses for the 14 new facilities that would be subject to additional reporting and recordkeeping requirement under the rule amendments.

The total labor costs over three years are $2,601,624. Details upon which this estimate is based appear in Tables 1a, 1b, and 1c.

(e) Bottom Line Burden Hours and Cost Tables.

The bottom line burden hours and cost tables for both EPA and the respondents are attached. The annual public reporting and recordkeeping burden for this collection of information is estimated to average 29 hours per response.

(f) Reasons for Change in Burden.

The change in burden cost is primarily due to the additional performance testing, monitoring, recordkeeping, and reporting costs attributable to the rule amendments. It is also due to the use of more current labor rates for calculating the industry and EPA burden.

(g) Burden Statement.

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 29 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 the Federal EPA. 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.

EPA may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA's regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2008-0260, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. 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 Air and Radiation Docket is (202) 566-1742. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public 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 above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2008-0260 and OMB Control Number 2060-0122 in any correspondence.

Part B of the Supporting Statement

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

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

Information Collection Activity	(A) Hours per Occurrence	(B) Occurrence per Respondent perYear	(C) Hours per Respondent per Year (A x B)	(D) Respondents per Year	(E) Technical Hours perYear (C x D)	(F) Managerial Hours per Year (E x 0.05)	(G) Clerical Hours per Year (E x 0.10)	(F) Cost per 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								
Read Subpart Y regulation requirements	2	1	2	14	28	1.4	2.8	$3,038
B. Required Activities								
a. Initial Performance Tests								
Coal handing affected facilities subject to Subpart Y - Supervise Method 5 stack test performed by contractor service	8	3	24.0	14	336	16.8	33.6	$36,452
All affected facilities except coal truck dumps subject to Subpart Y subject to opacity limit - Supervise Method 9 opacity test performed by contractor service	2	5	10.0	14	140	7.0	14.0	$15,188
Coal truck dump subject to Subpart Y - Supervise quarterly Method 9 opacity test performed by contractor service	4	1	4.0	2	8	0.4	0.8	$868
b. Repeat Performance Tests								
Coal handing affected facilities subject to Subpart Y - Supervise Method 5 stack test performed by contractor service	8	0	0.0	14	0	-	-	$0
All affected facilities except coal truck dumps subject to Subpart Y opacity limit - Supervise Method 9 opacity test performed by contractor service	2	0.5	1.0	14	14	0.7	1.4	$1,519
Coal truck dumps subject to Subpart Y - Supervise quarterly Method 9 opacity test performed by contractor service	4	3	12.0	2	24	1.2	2.4	$2,604
c. Compliance Monitoring and Inspection								
Daily plant walkthrough visual observation of affected facilities for visible emissions	1	350	350.0	7	2,450	122.5	245.0	$265,798
Monthly visual inspection of control equipment used for affected facilities subject to Subpart Y opacity standard	1	36	36.0	7	252	12.6	25.2	$27,339
Coal handling affected facilities using fabric filte r - bag leak detectors (BLD)	0.25	175	43.8	14	613	30.6	61.3	$66,450
d. Site-specific Emission Control Plans								
All coal processing and handling affected facilities - prepare "Fugitive Emission Control Plan"	40	1	40.0	14	560	28.0	56.0	$60,754
Affected facilities using fabric filter - prepare "BLD Monitoring Plan"	40	1	40.0	14	560	28.0	56.0	$60,754
e. Site-specific Emission Controls Operations Logboo k								
Prepare logbook	8	1	8.0	14	112	5.6	11.2	$12,151
Record required emission control equipment operating and maintenance data	0.5	350	175.0	14	2,450	122.5	245.0	$265,798
C. Create Information (Included in 4B)								
D. Gather Existing Information (Included in 4E)								
E. Write Report								
a. Notificatio ns								
Notification of construction/ reconstruction commencement	2	1	2.0	14	28	1.4	2.8	$3,038
Notification of actual startup	2	1	2.0	14	28	1.4	2.8	$3,038
Notification of initial performance tests except coal dump trucks	2	8	16.0	14	224	11.2	22.4	$24,302
Notification of initial performance test for coal truck dumps	2	1	2.0	2	4	0.2	0.4	$434
Notification of repeat performance test except coal truck dumps	1	0.5	0.5	14	7	0.4	0.7	$759
Notification of repeat performance test for coal dumps	1	3	3.0	2	6	0.3	0.6	$651
Notification of physical or operational change	2	1	2.0	14	28	1.4	2.8	$3,038
b. Reports								
Performance test reports except coal truck dumps (review and transmit test report prepared by test contractor)	4	8.5	34.0	14	476	23.8	47.6	$51,641
Performance test report for coal truck dumps (review and transmit test report prepared by test contractor)	2	4	8.0	2	16	0.8	1.6	$1,736
Semi-annual excess emissions report	8	2	16.0	14	224	11.2	22.4	$24,302
5. RECORDKEEPING REQUIREMENTS								
A. Read Instructions (Included in 4A)								
B. Plan Activities (Included in 4B)								
C. Implement Activities (Included in 4B)								
D. Record Data (Included in 4B)								
E. Time to Transmit or Disclose Information								
Electronically transmit data	1	12	12.0	14	168	8.4	16.8	$18,226
F. Time to Train Personnel								
Plant personnel walkthrough observation procedure	8	3	24.0	7	168	8.4	16.8	$18,226
G. Time for Audits (Not Applicable)								
			Total Hours by Labor Category		8,924	446	892	
TOTAL ANNUAL LABOR BURDEN AND COST						10,262	Hours	$968,103
ANNUALIZED CAPITAL COSTS (see Table 1C below)								
Fabric filter bag leak detector system								$224,843
ANNUAL COSTS (O&M) (see Table 1D below)								
Performance sources tests contracted to third-party company								$404,500
Monitoring/recordkeeping/reporting supplies								$24,290
TOTAL ANNUALIZED COSTS (Annualized capital costs + total annual O&M costs)								$1,621,735

See Table 1d for assumptions

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

Information Collection Activity	(A) Hours per Occurrence	(B) Occurrence per Respondent perYear	(C) Hours per Respondent per Year (A x B)	(D) Respondents per Year	(E) Technical Hours perYear (C x D)	(F) Managerial Hours per Year (E x 0.05)	(G) Clerical Hours per Year (E x 0.10)	(F) Cost per 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								
Read Subpart Y regulation requirements	2	0	0	14	0	-	-	$0
B. Required Activities								
a. Initial Performance Tests								
Coal handing affected facilities subject to Subpart Y - Supervise Method 5 stack test performed by contractor service	8	0	0.0	14	0	-	-	$0
All affected facilities except coal truck dumps subject to Subpart Y subject to opacity limit - Supervise Method 9 opacity test performed by contractor service	2	0	0.0	14	0	-	-	$0
Coal truck dump subject to Subpart Y - Supervise quarterly Method 9 opacity test performed by contractor service	4	0	0.0	2	0	-	-	$0
b. Repeat Performance Tests								
Coal handing affected facilities subject to Subpart Y - Supervise Method 5 stack test performed by contractor service	8	3	24.0	14	336	16.8	33.6	$36,452
All affected facilities except coal truck dumps subject to Subpart Y opacity limit - Supervise Method 9 opacity test performed by contractor service	2	5.5	11.0	7	77	3.9	7.7	$8,354
Coal truck dumps subject to Subpart Y - Supervise quarterly Method 9 opacity test performed by contractor service	4	4	16.0	2	32	1.6	3.2	$3,472
c. Compliance Monitoring and Inspection								
Daily plant walkthrough visual observation of affected facilities for visible emissions	1	350	350.0	7	2,450	122.5	245.0	$265,798
Monthly visual inspection of control equipment used for affected facilities subject to Subpart Y opacity standard	1	36	36.0	7	252	12.6	25.2	$27,339
Coal handling affected facilities using fabric filte r - bag leak detectors (BLD)	0.25	175	43.8	14	613	30.6	61.3	$66,450
d. Site-specific Emission Control Plans								
All coal processing and handling affected facilities - prepare "Fugitive Emission Control Plan"	40	0	0.0	14	0	-	-	$0
Affected facilities using fabric filter - prepare "BLD Monitoring Plan"	40	0	0.0	14	0	-	-	$0
e. Site-specific Emission Controls Operations Logboo *k*								
Prepare logbook	8	1	8.0	14	112	5.6	11.2	$12,151
Record required emission control equipment operating and maintenance data	0.5	350	175.0	14	2,450	122.5	245.0	$265,798
C. Create Information (Included in 4B)								
D. Gather Existing Information (Included in 4E)								
E. Write Report								
a. Notificatio *ns*								
Notification of construction/ reconstruction commencement	2	0	0.0	14	0	-	-	$0
Notification of actual startup	2	0	0.0	14	0	-	-	$0
Notification of initial performance tests except coal dump trucks	2	0	0.0	14	0	-	-	$0
Notification of initial performance test for coal truck dumps	2	0	0.0	2	0	-	-	$0
Notification of repeat performance test except coal truck dumps	1	8.5	8.5	14	119	6.0	11.9	$12,910
Notification of repeat performance test for coal dumps	1	4	4.0	2	8	0.4	0.8	$868
Notification of physical or operational change	2	1	2.0	14	28	1.4	2.8	$3,038
b. Reports								
Performance test reports except coal truck dumps (review and transmit test report prepared by test contractor)	4	8.5	34.0	14	476	23.8	47.6	$51,641
Performance test report for coal truck dumps (review and transmit test report prepared by test contractor)	2	4	8.0	2	16	0.8	1.6	$1,736
Semi-annual excess emissions report	8	2	16.0	14	224	11.2	22.4	$24,302
5. RECORDKEEPING REQUIREMENTS								
A. Read Instructions (Included in 4A)								
B. Plan Activities (Included in 4B)								
C. Implement Activities (Included in 4B)								
D. Record Data (Included in 4B)								
E. Time to Transmit or Disclose Information								
Electronically transmit data	1	12	12.0	14	168	8.4	16.8	$18,226
F. Time to Train Personnel								
Plant personnel walkthrough observation procedure	8	3	24.0	7	168	8.4	16.8	$18,226
G. Time for Audits (Not Applicable)								
					7,529	376	753	
TOTAL ANNUAL LABOR BURDEN AND COST					Total Labor Burden and Cost	8,658	Hours	$816,761
ANNUALIZED CAPITAL COSTS (see Table 1C below)								
Fabric filter bag leak detector system								$224,843
ANNUAL COSTS (O&M) (see Table 1D below)								
Performance sources tests contracted to third-party company								$354,450
Monitoring/recordkeeping/reporting supplies								$7,000
TOTAL ANNUALIZED COSTS (Annualized capital costs + total annual O&M costs)								$1,403,053

See Table 1d for assumptions

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

Information Collection Activity	(A) Hours per Occurrence	(B) Occurrence per Respondent perYear	(C) Hours per Respondent per Year (A x B)	(D) Respondents per Year	(E) Technical Hours perYear (C x D)	(F) Managerial Hours per Year (E x 0.05)	(G) Clerical Hours per Year (E x 0.10)	(F) Cost per 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								
Read Subpart Y regulation requirements	2	0	0	14	0	-	-	$0
B. Required Activities								
a. Initial Performance Tests								
Coal handing affected facilities subject to Subpart Y - Supervise Method 5 stack test performed by contractor service	8	0	0.0	14	0	-	-	$0
All affected facilities except coal truck dumps subject to Subpart Y subject to opacity limit - Supervise Method 9 opacity test performed by contractor service	2	0	0.0	14	0	-	-	$0
Coal truck dump subject to Subpart Y - Supervise quarterly Method 9 opacity test performed by contractor service	4	0	0.0	2	0	-	-	$0
b. Repeat Performance Tests								
Coal handing affected facilities subject to Subpart Y - Supervise Method 5 stack test performed by contractor service	8	3	24.0	14	336	16.8	33.6	$36,452
All affected facilities except coal truck dumps subject to Subpart Y opacity limit - Supervise Method 9 opacity test performed by contractor service	2	5.5	11.0	7	77	3.9	7.7	$8,354
Coal truck dumps subject to Subpart Y - Supervise quarterly Method 9 opacity test performed by contractor service	4	4	16.0	2	32	1.6	3.2	$3,472
c. Compliance Monitoring and Inspection								
Daily plant walkthrough visual observation of affected facilities for visible emissions	1	350	350.0	7	2,450	122.5	245.0	$265,798
Monthly visual inspection of control equipment used for affected facilities subject to Subpart Y opacity standard	1	36	36.0	7	252	12.6	25.2	$27,339
Coal handling affected facilities using fabric filte r - bag leak detectors (BLD)	0.25	175	43.8	14	613	30.6	61.3	$66,450
d. Site-specific Emission Control Plans								
All coal processing and handling affected facilities - prepare "Fugitive Emission Control Plan"	40	0	0.0	14	0	-	-	$0
Affected facilities using fabric filter - prepare "BLD Monitoring Plan"	40	0	0.0	14	0	-	-	$0
e. Site-specific Emission Controls Operations Logboo k								
Prepare logbook	8	1	8.0	14	112	5.6	11.2	$12,151
Record required emission control equipment operating and maintenance data	0.5	350	175.0	14	2,450	122.5	245.0	$265,798
C. Create Information (Included in 4B)								
D. Gather Existing Information (Included in 4E)								
E. Write Report								
a. Notificatio ns								
Notification of construction/ reconstruction commencement	2	0	0.0	14	0	-	-	$0
Notification of actual startup	2	0	0.0	14	0	-	-	$0
Notification of initial performance tests except coal dump trucks	2	0	0.0	14	0	-	-	$0
Notification of initial performance test for coal truck dumps	2	0	0.0	2	0	-	-	$0
Notification of repeat performance test except coal truck dumps	1	8.5	8.5	14	119	6.0	11.9	$12,910
Notification of repeat performance test for coal dumps	1	4	4.0	2	8	0.4	0.8	$868
Notification of physical or operational change	2	1	2.0	14	28	1.4	2.8	$3,038
b. Reports								
Performance test reports except coal truck dumps (review and transmit test report prepared by test contractor)	4	8.5	34.0	14	476	23.8	47.6	$51,641
Performance test report for coal truck dumps (review and transmit test report prepared by test contractor)	2	4	8.0	2	16	0.8	1.6	$1,736
Semi-annual excess emissions report	8	2	16.0	14	224	11.2	22.4	$24,302
5. RECORDKEEPING REQUIREMENTS								
A. Read Instructions (Included in 4A)								
B. Plan Activities (Included in 4B)								
C. Implement Activities (Included in 4B)								
D. Record Data (Included in 4B)								
E. Time to Transmit or Disclose Information								
Electronically transmit data	1	12	12.0	14	168	8.4	16.8	$18,226
F. Time to Train Personnel								
Plant personnel walkthrough observation procedure	8	3	24.0	7	168	8.4	16.8	$18,226
G. Time for Audits (Not Applicable)								
			Total Hours by Labor Category		7,529	376	753	
TOTAL ANNUAL LABOR BURDEN AND COST						8,658	Hours	$816,761
ANNUALIZED CAPITAL COSTS (see Table 1C below)								
Fabric filter bag leak detector system								$224,843
ANNUAL COSTS (O&M) (see Table 1D below)								
Performance sources tests contracted to third-party company								$354,450
Monitoring/recordkeeping/reporting supplies								$7,000
TOTAL ANNUALIZED COSTS (Annualized capital costs + total annual O&M costs)								$1,403,053

See Table 1d for assumptions

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

Respondent Burden (based on a total of 14 respondents)	Total Annual Labor Burden (Hours)	Total Annual Labor Costs	Total Annualized Capital Costs	Total Annual O&M Costs	Total Annualized Costs
Year 1 (see Table 1a)	10,262	$968,103	$224,843	$428,790	$1,621,735
Year 2 (see Table 1b)	8,658	$816,761	$224,843	$361,450	$1,403,053
Year 3 (see Table 1c)	8,658	$816,761	$224,843	$361,450	$1,403,053
Nationwide 3-Year Total	27,578	$2,601,624	$674,528	$1,151,690	$4,427,842
Nationwide Annual Average	9,193	$867,208	$224,843	$383,897	$1,475,947
Average per Respondent	657	$61,943	$16,060	$27,421	$105,425

Respondent Assumptions for Burden and Cost Estimates	
14	Total number of coal preparation plants constructed first 3 years after rule applicability date
5	Average number of coal handling affected facilities except coal truck dump per plant site subject to Subpart Y opacity limit
3	Average number of coal handling affected facilities at plant site using enclosure and mechanically vented to fabric filter
2	Average number of coal handling affected facilities using fabric filter subject to BLD requirement
2	Number of plant sites with coal truck dumps subject to Subpart Y opacity limit
10%	Percent of coal handling affected facilities subject to Subpart Y opacity limit requiring 90-day repeat Method 9 performance test
50%	Percent of plant owners/operators electing to perform daily walkthrough visual emission observations for compliance monitoring
50%	Percent of plant owners/operators electing to perform repeat Method 9 opacity testing for compliance monitoring

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

Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Plant/Year	(C) EPA Hours/ Plant/Year (A x B)	(D) Plants/ Year	(E) EPA Technical Hours/ Year (C x D)	(F) EPA Managerial Hours/Year	(G) EPA Clerical Hours/Year	(H) Cost, $
Notification Review								
Construction/reconstruction commencement notifications	1	1	1	14	14	1	0.1	$ 814
Actual startup notifications	1	1	1	14	14	1	0.1	$ 814
Performance test notifications	1	9	9	14	127	6	1	$ 7,387
Physical or Operational Change	1	1	1	14	14	1	0	$ 814
Site-Specific Emission Control Plan Review								
Review site-specific "Fugitive Emission Control Plan"	8	1	8	14	112	6	1	$ 6,514
Review site-specific "Bag Leak Detector Monitoring Plan"	8	1	8	14	112	6	1	$ 6,514
Compliance Demonstration Reports Review								
Review performance test reports	4	9	36	14	508	25	5	$ 29,547
Review semi-annual excess emissions reports	4	2	8	14	112	6	1	$ 6,514
Coal Preparation Plant Site Visits								
Observe Method 5 Performance Test	24	1	24	1	24	1	0	$ 1,396
Observe Method 9 Performance Test	24	1	24	2	48	2	0	$ 2,792
Total Annual Hours by Labor Category					1,085	54	11	
TOTAL ANNUAL LABOR BURDEN AND COST						1,150	hours	$ 63,107
OTHER DIRECT COSTS								
Travel Expenses								$ 2,700
Miscellaneous cost (e.g., telephone, photcopies, postage, etc.)								$ 1,400
TOTAL ANNUAL COST (Annual Labor Cost + Annual Other Direct Costs)								**$ 67,207**

Assumes 1 Method 5 and 2 Method 9 performance test site visits at $900 each for a total of 3 trips annually. The $900 includes the costs for airline, car rental, hotel, and per diem for 3 days.

The Federal Employee Labor Rates are from salary table 2009-GS. The loaded rates used are $33.84 for technical, 47.03 for manager, and 16.04 for clerical.

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

Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Plant/Year	(C) EPA Hours/ Plant/Year (A x B)	(D) Plants/ Year	(E) EPA Technical Hours/ Year (C x D)	(F) EPA Managerial Hours/Year	(G) EPA Clerical Hours/Year	(H) Cost, $
Notification Review								
Construction/reconstruction commencement notifications	1	0	0	14	0	0	0.0	$ -
Actual startup notifications	1	0	0	14	0	0	0.0	$ -
Performance test notifications	1	9	9	14	127	6	1	$ 7,387
Physical or Operational Change	1	1	1	14	14	1	0	$ 814
Site-Specific Emission Control Plan Review								
Review site-specific "Fugitive Emission Control Plan"	8	0	0	14	0	0	0	$ -
Review site-specific "Bag Leak Detector Monitoring Plan"	8	0	0	14	0	0	0	$ -
Compliance Demonstration Reports Review								
Review performance test reports	4	9	36	14	508	25	5	$ 29,547
Review semi-annual excess emissions reports	4	2	8	14	112	6	1	$ 6,514
Coal Preparation Plant Site Visits								
Observe Method 5 Performance Test	24	1	24	1	24	1	0	$ 1,396
Observe Method 9 Performance Test	24	1	24	2	48	2	0	$ 2,792
Total Annual Hours by Labor Category					833	42	8	
TOTAL ANNUAL LABOR BURDEN AND COST						883	hours	$ 48,450
OTHER DIRECT COSTS								
Travel Expenses								$ 2,700
Miscellaneous cost (e.g., telephone, photcopies, postage, ect.)								$ 1,400
TOTAL ANNUAL COST (Annual Labor Cost + Annual Other Direct Costs)								**$ 52,550**

Assumes 1 Method 5 and 2 Method 9 performance test site visits at $900 each for a total of 3 trips annually. The $900 includes the costs for airline, car rental, hotel, and per diem for 3 days.

The Federal Employee Labor Rates are from salary table 2009-GS. The loaded rates used are $33.84 for technical, 47.03 for manager, and 16.04 for clerical.

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

Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Plant/Year	(C) EPA Hours/ Plant/Year (A x B)	(D) Plants/ Year	(E) EPA Technical Hours/ Year (C x D)	(F) EPA Managerial Hours/Year	(G) EPA Clerical Hours/Year	(H) Cost, $
Notification Review								
Construction/reconstruction commencement notifications	1	0	0	14	0	0	0.0	$ -
Actual startup notifications	1	0	0	14	0	0	0.0	$ -
Performance test notifications	1	9	9	14	127	6	1	$ 7,387
Physical or Operational Change	1	1	1	14	14	1	0	$ 814
Site-Specific Emission Control Plan Review								
Review site-specific "Fugitive Emission Control Plan"	8	0	0	14	0	0	0	$ -
Review site-specific "Bag Leak Detector Monitoring Plan"	8	0	0	14	0	0	0	$ -
Compliance Demonstration Reports Review								
Review performance test reports	4	9	36	14	508	25	5	$ 29,547
Review semi-annual excess emissions reports	4	2	8	14	112	6	1	$ 6,514
Coal Preparation Plant Site Visits								
Observe Method 5 Performance Test	24	1	24	1	24	1	0	$ 1,396
Observe Method 9 Performance Test	24	1	24	2	48	2	0	$ 2,792
Total Annual Hours by Labor Category					833	42	8	
TOTAL ANNUAL LABOR BURDEN AND COST						883	hours	$ 48,450
OTHER DIRECT COSTS								
Travel Expenses								$ 2,700
Miscellaneous cost (e.g., telephone, photcopies, postage, etc.)								$ 1,400
TOTAL ANNUAL COST (Annual Labor Cost + Annual Other Direct Costs)								**$ 52,550**

Assumes 1 Method 5 and 2 Method 9 performance test site visits at $900 each for a total of 3 trips annually. The $900 includes the costs for airline, car rental, hotel, and per diem for 3 days.

The Federal Employee Labor Rates are from salary table 2009-GS. The loaded rates used are $33.84 for technical, 47.03 for manager, and 16.04 for clerical.

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

Year	Total Annual Labor Burden (Hours)	Total Annual Costs
1	1,150	$ 67,207
2	883	$ 52,550
3	883	$ 52,550
Total	2,916	$ 172,307
3-Year Average	972	$ 57,436