SUPPORTING STATEMENT ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Portland Cement (40 CFR Part 63, Subpart LLL) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Portland Cement (40 CFR Part 63, Subpart LLL) (Renewal), EPA ICR Number 1801.08, OMB Control Number 2060-0416

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the regulations published at 40 CFR part 63, subpart LLL, were proposed on March 24, 1998, promulgated on June 14, 1999, and subsequently revised on December 20, 2006. These regulations apply to the following facilities: each new, existing or reconstructed kiln, in-line kiln/raw mill and greenfield raw material dryer at these facilities, except for kilns and in-line kiln/raw mills that burn hazardous waste and are subject to 40 CFR 63, subpart EEE or that burn municipal solid waste and are subject to 40 CFR part 60, subpart Cb or Ea. In addition, the rule applies to each new, existing or reconstructed clinker cooler; raw mill; finish mill; raw material, clinker or finished product storage bin; conveying system transfer point; bagging system and bulk loading and unloading system at facilities that are major sources; and to each existing, reconstructed or new brownfield raw material dryer at facilities that are major sources. This information is being collected to assure compliance with 40 CFR part 63, subpart LLL.

Emission limits for mercury from new cement kilns were established under the December 2006 final amendments. A mercury performance test is required to demonstrate compliance with the emission limits for mercury. The final amendments also established emission limits for total hydrocarbons (THC) for new kilns and revise the emission limits for new greenfield kilns. To demonstrate compliance with the THC limits, owners or operators of new kilns would be required to continuously monitor THC emissions. To ensure proper combustion of organic HAP from existing kilns, owners or operators of portland cement manufacturing plants must implement good combustion practices (GCP) designed to minimize THC from fuel combustion. Respondents are required to maintain additional records to demonstrate compliance with THC limits. The 2006 final amendments also required that records be kept of the amount of cement kiln dust (CKD) that is removed from existing and new kiln systems and either disposed of as solid waste or otherwise recycled for a beneficial use outside of the kiln system.

In addition to the new requirements established from the 2006 amendments, in general, all NESHAP standards require initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are

essential in determining compliance, and are required of all sources subject to the NESHAP.

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 United States Environmental Protection Agency (EPA) regional office.

Approximately 94 portland cement plants with 158 non-hazardous waste cement kilns are currently subject to the regulation. It is estimated that 20 new kilns will be built over the next five years or 12 additional sources will become subject to the regulation over the next three year ICR period. All new kilns are estimated to be constructed at existing portland cement plants, and it is estimated that two new kilns will be installed at two existing plants, for a total of 4 new kilns per year. Since the records and reports are maintained at the plant-level, the estimate for the number of respondents to this ICR is tracked at the plant-level. Although there are new kilns estimated at existing plants, there are no new respondents estimated during this ICR.

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

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

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

In the Administrator's judgment, hazardous air pollutant (HAP) emissions from portland cement manufacturing facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source

2(b) Practical Utility/Users of the Data

The control of emissions of HAPs from portland cement manufacturing facilities requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of HAPs from portland cement manufacturing facilities are the result of operation of the affected facilities. The subject standards are achieved by the capture of particulate HAP emissions using fabric filters or electrostatic precipitators control, temperature control for the reduction of dioxins and furans (D/F), and feed selection for reduction of other organic HAP.

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

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission 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 leaks are being detected and repaired and the standards are being met. The performance test may also be observed.

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

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

The recordkeeping and reporting requested is required under 40 CFR part 63, subpart LLL.

3(a) Non-duplication

If the 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 regulation 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 <u>Federal Register</u> on July 8, 2009 (74 <u>FR</u> 32580). No comments were received on the burden published in the <u>Federal Register</u>.

3(c) Consultations

The agency is basing the burden estimates of this ICR on estimates prepared for the December 20, 2006 amendments. During those amendments, the Agency consulted with industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. Those included in those consultations included State and local agencies, individual portland cement manufacturing plants, industry trade associations, and environmental groups. We specifically consulted with stakeholders on some of the ICR requirements of these final amendments. Participants in the development process for those amendments included STAPPA/ALAPCO, the Portland Cement Association (PCA), the American Portland Cement Alliance (APCA), the Small Company MACT Coalition, the Sierra Club, and Earth Justice. Several meetings with industry representatives were held in the period leading to proposal and the final amendments, and public comments received from trade associations, cement companies, State and local regulatory agencies, and environmental groups were considered in the development of the current rule. Public comments received following proposal were considered in developing the final amendments regarding monitoring, recordkeeping, or reporting procedures.

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 <u>Federal Register</u> 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. However, most NESHAP standards and a few NSPS standards require records to be kept more than three years. In general, these standards require the respondents to maintain all records, including reports and notifications, for five years. The five-year record retention requirement is consistent with the permit program at 40 CFR part 70, 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 the respondent for purposes of determining the appropriate level of enforcement action. Historically, EPA notes that the most flagrant violations have extended beyond a five-year period. If records are retained for less than five years, EPA would be deterred from pursuing the most flagrant violations due to the destruction of records documenting noncompliance.

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/NAICS Codes

The respondents to the recordkeeping and reporting requirements are portland cement manufacturing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is 3241 which corresponds to the North American Industry Classification System (NAICS) 32731 for portland cement manufacturing facilities.

4(b) Information Requested

(i) Data Items

All data in this ICR that is recorded and/or reported is required by NESHAP for the Portland Cement Manufacturing Industry (40 CFR part 63, subpart LLL).

A source must make the following reports:

Notification Reports			
Notification of anticipated startup	63.9(b)(3)		
Notification of applicability	63.9(b)(1&2)		
Notification of actual startup	63.9(b)(4)		

Notification Reports				
Notification of construction/reconstruction	63.9(b)(5)			
Request for extension of compliance	63.9(c)			
Notification of special compliance requirements	63.9(d)			
Notification of initial performance test	63.9(e), 63.7(b)			
Notification of opacity and visible emission observations	63.9(f)			
Notification of the continuous emission monitoring performance evaluation	63.8(e), 63.9(g)			
Notification of compliance status	63.9(h)			
Adjustments to time periods or postmark deadlines for submittal and review of required communications	63.9(i)			
Change in information already provided	63.9(j)			

Reports					
Operations and maintenance plan	63.1350(a)				
Report of performance test	63.10(d)(2)				
Opacity and visual emission observation	63.10(d)(3)				
Progress reports	63.10(d)(4)				
Periodic startup, shutdown, malfunction reports	63.10(d)(5)(i)				
Immediate startup, shutdown, malfunction reports	63.10(d)(5)(ii)				
Reporting results of continuous monitoring system performance evaluations	63.10(e)(2)				
Excess emissions and continuous monitoring system performance report and summary report	63.10(e)(3)				
Reporting continuous opacity monitoring system data produced during a performance test	63.10(e)(4)				
Waiver of recordkeeping and reporting requirements	63.10(f)				

 \boldsymbol{A} source must maintain the following records:

Recordkeeping					
All reports and notifications	63.10(b)				
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	63.10(b)(2)				
Record of applicability	63.10(b)(3)				
Records for sources with continuous monitoring systems	63.10(c)				
Records for cement dust kilns (CDK)	63.1355(d)				
Records are required to be retained for five (5) years. The first two (2) years of records must be retained at the facility	63.1355(a), 63.10(b) (1)				

(ii) Respondent Activities

Respondent Activities

Read instructions.

Install, calibrate, maintain, and operate CMS for: 1) opacity; 2) to record the temperature of the exhaust gases to monitor D/F; 3) to record the rate of carbon injection and the carrier gas parameter, if using activated carbon injection to control D/F; and 4) to measure Total Hydrocarbons (THC), if applicable.

Perform initial performance test, Reference Method 5 test for Particulates, Method 9 test for Opacity, Method 23 test for dioxin/furans (D/F), and Performance Specification 8A of Appendix B to part 60 for THC, if applicable. 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.

Respondent Activities

Train personnel to be able to respond to a collection of information.

Transmit, or otherwise disclose the information.

Electronic Reporting

At the present, many respondents to CAA standards use monitoring equipment that automatically records parameter data. Although personnel at the affected facility must evaluate the data, this internal automation has significantly reduced the burden associated with monitoring and recordkeeping at the plant site.

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

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

5(a) Agency Activities

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

Agency Activities

Observe initial performance tests and repeat performance tests, if necessary.

Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.

Audit facility records.

Input, analyze, and maintain data in the AIRS (Aerometric Information Retrieval System) Facility Subsystem (AFS) database.

5(b) Collection Methodology and Management

The required data and reports can be evaluated on-site by conducting a partial compliance evaluation, full compliance evaluation or inspection, or through an off-site review of compliance monitoring records and reports. Evaluation reports and inspection results are maintained by the Agency or delegated authority.

The results of these evaluations are entered into the Air Facility Subsystem (AFS) which

is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and delegated authorities can retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced. The PCA study "U.S. and Canadian Portland Cement Industry: Plant Information Summary," indicates there are 35 companies with affected Portland cement facilities. Of these, six companies (or 17 percent) are considered small entities. The Agency assumes that 17 percent of the 94 facilities affected by this ICR, or 16 facilities, are small entities.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1.

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 28,242 hours (Total Labor Hours

from Table 1). The recordkeeping hours shown below in Table 1 are 25,545 hours. The reporting requirement hours shown below in Table 1 are 2,697. These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial \$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, March 2009, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

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

The types of industry costs associated with the information collection activity in the regulations are for labor and continuous emission monitoring (CEM). Since the 2006 amendments required all new kilns constructed on or after December 2, 2005, to install THC monitors, it is also assumed that a THC CEM will be installed on each new kiln. The capital cost and the O&M cost of the THC monitor were estimated using an updated Version 3 of EPA's Continuous Emission Monitoring System Cost Model. 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 monitor and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Costs, (B X C)	(E) Annual O&M Cost for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M Costs, (E X F)
Continuous Emission	\$220,000	4	\$880,000	\$7,400	94	\$791,800

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
Monitors						
THC Continuous Emission Monitors	\$139,800	4	\$559,200	\$22,073	4	\$88,292

The total capital/startup costs for this ICR are \$1,439,200. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$880,092. This is the total of column G.

The average annual cost for capital/startup and O&M costs to the industry over the next three years of the ICR is estimated to be \$2,319,292. This is the average annual cost for the 3-year ICR period from column G above which includes annual O&M costs and annualized capital costs as discussed below. These are recordkeeping costs.

(iv) Annualizing Capital Costs

The capital cost associated for a THC monitor and CEM 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 \$204,910.

6(c) Estimating Agency Burden and Costs

The only costs to the Agency are those associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$243,774 and is shown below in Table 2.

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

Managerial \$61.36 (GS-13, Step 5, \$38.35 + 60%)
Technical \$45.52 (GS-12, Step 1, \$28.45 + 60%)
Clerical \$24.64 (GS-6, Step 3, \$15.40 + 60%)

These rates are from the Office of Personnel Management (OPM) 2009 General Schedule, which

excludes locality rates of pay. The rates have been increased by 60% to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden – NESHAP for Portland Cement (40 CFR Part 63, Subpart LLL) (Renewal).

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

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

	Number of Respondents						
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports				
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records but Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)		
1	2	94	0	2	94		
2	2	94	0	2	94		
3	2	94	0	2	94		
Averag e	2	94	0	2	94		

 $^{^{1}}$ New respondents include sources with constructed, reconstructed and modified affected facilities.

Because all of the new kilns expected to be constructed are located at plants that also have existing sources, two of the 94 plants (respondents) can be classified as both a new and existing source. To avoid double-counting respondents, column D is subtracted. The average Number of Respondents over the three-year period of this ICR is shown in column E.

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

Total Annual Responses					
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D	
Notification of Applicability	2	2	0	4	
Notification of Construction/Reconstruction	2	2	0	4	
Notification of Actual Startup	2	2	0	4	
Notification of THC Performance Tests	2	2	0	4	
Notification of Hg Performance Tests	2	2	0	4	
Notification of Performance Test	56.4	1.1	0	62	
Notification of Opacity and Visible Emissions Observation	56.4	1	0	56.4	
Notification of the Continuous Emission Monitor Performance Evaluation	2	2	0	4	
Notification of Compliance Status	2	2	0	4	
Report of Initial Performance Tests	2	2	0	4	
Report of Periodic Performance Tests	56.4	1.1	0	62	
Excess Emissions and Continuous Monitoring System Performance Report and Summary Report	94	2	0	188	
Immediate Startup, Shutdown, Malfunction Reports	5	1	0	5	
Total				405.5	

The number of Total Annual Responses is shown in column E.

The total annual labor cost may be found in Table 1.

The average annual Agency burden and cost over next three years is shown in Table 2.

6(e) Bottom Line Burden Hours Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 28,242. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Portland Cement (40 CFR Part 63, Subpart LLL) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 69.56 hours per response.

The average annualized capital/startup and annual O&M costs to the regulated entity are \$2,319,292. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 5,437 labor hours at a cost of \$243,774. See below Table 2: Annual Agency Burden and Cost - NESHAP for Portland Cement (40 CFR Part 63, Subpart LLL) (Renewal).

6(f) Reasons for Change in Burden

The increase in burden hours and dollars from the most recently approved ICR renewal (EPA ICR number 1801.07) is due to a 2006 program change in the regulation requiring additional performance testing, monitoring, recordkeeping, and reporting requirements. These amendments would affect any new, modified, or reconstructed sources after December 2, 2005.

There was a decrease in number of responses currently identified in the OMB Inventory of Approved Burdens. This decrease is due to the correction of transpose error in the currently approved burden estimates in ICRAS. Further, the number of responses also decreased due to a decrease in the number of estimated portland cement plants affected by ICR since the last renewal.

The increase in capital/start-up and O&M costs is also due to a 2006 program change in the regulation requiring new monitoring equipment. The THC monitors are a new requirement for new sources since the last ICR renewal. Further, the change in labor costs for industry and EPA is due to the use of more current labor rates.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 69.56 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose, or provide information to or for a Federal agency. This includes the time needed to review instructions; to 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; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of

information; to search data sources; to complete and review the collection of information; and to 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-2009-0425. An electronic version of the public docket is available at http://www.regulations.gov/ which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0425 and OMB Control Number 2060-0416 in any correspondence.

Part B of the Supporting Statement

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