

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Commercial and Industrial Solid Waste Incineration Units (40 CFR Part 60, Subpart CCCC) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Commercial and Industrial Solid Waste Incineration Units (40 CFR Part 60, Subpart CCCC) (Renewal), EPA ICR Number 1926.05, OMB Control Number 2060-0450

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Commercial and Industrial Solid Waste Incineration Units (CISWI) were proposed on November 30, 1999, and promulgated on December 1, 2000. This standard applies to solid waste incinerators as defined at 40 CFR, part 60, subpart CCCC.

Respondents are owners or operators of solid waste incinerators. This standard applies to new stationary sources, that is, incineration units that meet either of the two criteria: 1) sources whose construction begins after the NSPS is proposed, which is November 30, 1999; or 2) sources that are reconstructed or modified on or after June 1, 2001. The standards apply to the owner or operator of a combustion device that combusts commercial and industrial waste. Commercial and industrial waste is a solid waste combusted in an enclosed device using controlled flame combustion without energy recovery, which is a distinct operating unit of any commercial or industrial facility, including field-erected, modular, and custom-built incineration units operating with starved or excess air, or solid waste combusted in an air curtain incinerator without energy recovery that is a distinct operating unit of any commercial or industrial facility.

The annual performance testing will ensure on an ongoing basis that the air pollution control device is operating properly and its performance has not deteriorated. To minimize the burden of the annual performance testing, the rule only requires that the owner or operator test for particulate matter (PM), hydrogen chloride (HCl), and opacity. Annual performance testing is not required for dioxins/furans, cadmium (Cd), carbon monoxide (CO), lead (Pb), mercury (Hg), nitrogen oxides (NO_x), and sulfur dioxide (SO₂). This significantly reduces the testing costs while still providing the EPA with sufficient data to adequately assess compliance. In addition, the rule allows the owner or operator to skip two annual tests for a pollutant if all performance tests over the previous three years show compliance with the emission limit. During the initial performance test (for PM, dioxins/furans, opacity, HCl, Cd, Pb, Hg, CO, NO_x and SO₂), the owner or operator must establish maximum or minimum values for each operating parameter. Thereafter, the owner or operator must conduct annual performance tests for PM, HCl, and opacity, and continuously monitor the operating parameters.

Owners or operators subject to the provisions of the subpart must perform the following

activities: conduct performance tests; monitor operating parameters; prepare siting analysis; prepare waste management plan, operator training and qualifications, one-time and periodic reports, and the maintenance of records. Reports are submitted semiannually and annually. These activities will enable EPA to determine initial compliance with emission standards for the regulated pollutants, monitor compliance with operating parameters, and ensure that facilities conduct the proper planning and operator training. Owners or operators of CISWI units are required to keep records of certain parameters and information for a period of five years.

The standards include annual operator training requirements for incinerator unit operators (rule requires at least one qualified operator or supervisor per facility). The annual training requirements include annual refresher training to maintain operator qualifications and an annual review of site-specific documentation. The way in which an incinerator is operated has a significant impact on the emissions from that incinerator. The annual operator training is essential to ensure that the incinerator is being operated properly. The rule contains flexibility in the operator training by allowing the use of state-approved training and qualification programs.

Records and reports required by the NSPS for commercial and industrial solid waste incineration units are necessary to enable EPA to identify sources subject to the standards and to ensure that the standards are being achieved. Records and reports must be maintained at the facility and/or submitted to EPA. All reports are sent to the delegated state, local, or tribal agency. In the event that there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

The information collection requirements for the NSPS for Commercial and Industrial Solid Waste Incineration Units are summarized in Section 4(b).

Approximately 31 sources are currently subject to the regulation which includes one new unit per year for the next three years. All respondents are owned by either business or other for-profit entities. The estimated labor cost of this ICR is \$1,021,351.

The burden to the “Affected Public” may be found below in Table 1: Annual Industry Burden and Cost - NSPS for Commercial and Industrial Solid Waste Incineration Units (40 CFR part 60, subpart CCCC) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by Federal employees or government contractors; this burden may be found below in Table 2: Annual EPA Burden - NSPS for Commercial and Industrial Solid Waste Incineration Units (40 CFR part 60, subpart CCCC) (Renewal).

The Office of Management and Budget (OMB) approved the current 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 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(1).

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

In the Administrator's judgment, emissions from commercial and industrial solid waste incinerators cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart CCCC.

2(b) Practical Utility/Users of the Data

The information generated by monitoring, recordkeeping, and reporting requirements described in this ICR is used by EPA to assure compliance with the regulations which 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 emission 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, if the continuous emission monitoring systems are not required. Performance test reports are needed as these are the Agency records of a source's initial capability to comply with the emission standards, and serve as a record of the operating conditions under which compliance was achieved. The Agency or delegated authority may also observe the performance test.

The notifications required by the regulation are used to inform the Agency or delegated authority when a source becomes subject to the requirements and regulations. The reviewing authority may then inspect the source to check if the pollution devices are properly installed and operated and if the facility complies with the regulatory standards.

The control of emissions of PM, HCl, or opacity from commercial and industrial solid waste incineration units requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of pollutants from commercial and industrial solid waste incineration are the result of operation of the affected facilities. The subject standards are achieved by the reduction of pollutant emissions using control technology and leak detection and repair procedures.

The semiannual reports are used for problem identification, as a check on source

operation and maintenance, and for compliance determinations. The information generated by the monitoring, recordkeeping and reporting requirement described in this ICR is used by the Agency to ensure that facilities affected by the NSPS continue to operate the control equipment in compliance with the regulation.

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

The requested recordkeeping and reporting are required under 40 CFR part 60, subpart CCCC.

3(a) Non-duplication

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

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

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register on July 30, 2009 (74 FR 38004). No comments were received on the burden published in the Federal Register.

3(c) Consultations

The primary source of information was the industry and EPA data including an assessment by the Office of Air and Radiation. Information provided by the industry is retained in the EPA Air Facility System (AFS) database which is operated and maintained by the EPA Office of Compliance. AFS is the EPA database for the collection, maintenance, and retrieval of all compliance data. Approximately 31 respondents are currently subject to the regulation, including one new respondent in each of the next three years.

It should be noted that the industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard when it was proposed and the standard was previously reviewed to determine the minimum information needed for compliance purposes. No major problems regarding the rule monitoring, recordkeeping, or reporting were identified during the public comment period.

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 that emission limitations are met. If the information required by these standards

were collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease. If the relevant information is collected at less frequent intervals, the EPA would not be reasonably assured that an affected facility owner or operator is in compliance with the standards.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

These standards require affected facilities to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the part 70 permit program and the five-year statute of limitations on which the permit program is based. Also, the retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than five years.

3(f) Confidentiality

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

3(g) Sensitive Questions

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 4 CFR part 1320, section 1320.5.

4. The Respondents and the Information Requested

4(a) Respondents/SIC and NAICS Codes

The respondents to the recordkeeping and reporting requirements are commercial and industrial solid waste incineration (CISWI) units. The United States Standard Industrial Classification (SIC) codes, which correspond to the North American Industry Classification System (NAICS) codes, can be found in the following table:

Standard	SIC Codes	NAICS Codes
Commercial and Industrial Solid Waste Incineration Units (40 CFR, part 60, subpart CCCC)		
Manufacturers of chemicals and allied products	28	325
Manufacturers of electronic equipment	34	325
Manufacturers of wholesale trade, durable goods	36	421
Manufacturers of lumber and wood furniture	24, 25	321, 337

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

All data in this ICR that is recorded and/or reported is required by New Source Performance Standards (NSPS) for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR part 60, subpart CCCC).

A source must make the following reports:

Notification Reports	
Notification of preconstruction (prior to commencing construction) including anticipated date of initial startup	60.2190
Notification of actual startup	60.2195
Notification of initial performance test	60.2200
Annual report	60.2205 and 60.2210
Emission limitation or operating limit deviation report	60.2215 and 60.2220
Qualified operator deviation notification	60.2225(a)(1)
Qualified operator deviation status report	60.2225(a)(2)
Qualified operator deviation notification of resumed operation	60.2225(b)
Status report for operator offsite for more than 2 weeks	60.2225(a)(2)

A source must keep the following records:

Recordkeeping	
Records of initial performance tests, annual performance tests, and any subsequent performance tests.	60.2175(f)
Maintain records of days for which data on operating parameters have not been obtained, including operating parameters not measured, reasons for not measuring, and a description of corrective actions taken.	60.2175(c)
Maintain records of occurrence and duration of malfunction and the corrective action taken.	60.2175(d)
Maintain records of days when deviation from operating limits have occurred, and description of corrective actions taken.	60.2175(e)
Maintain records of all documentation produced for the siting analysis.	60.2175(g)
Maintain records of names of persons who have completed review of site-specific information and incinerator operating procedures.	60.2175(h) and 60.2095(a)
Maintain records of names of persons who have completed the operator training requirements.	60.2175(i)
Maintain records of names of phone and/or pager numbers of persons who have met the operator qualification criteria.	60.2175(j)
Maintain records or calibration of monitoring devices.	60.2175(k)
Maintain records of equipment vendor specifications for the incinerator, emission controls, and monitoring equipment.	60.2175(l)
Maintain records of daily log of quantity and types of wastes burned.	60.2175(n)
Records should be retained for five years.	60.2175

Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., leaks and spills of mercury. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronic reporting systems are still not widely used by the regulatory agencies. It is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities

Respondent Activities
Install, calibrate, maintain, and operate control devices for PM, HCl, and opacity.
Perform initial performance test, Reference Method 1, 3A or 3B test, 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 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: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

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

Agency Activities
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 Facility Subsystem (AFS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and to note the operating conditions under which compliance was

achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into the AFS which is operated and maintained by the EPA Office of Compliance. AFS is the EPA database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for more than 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 its delegated Authorities can edit, store, retrieve and analyze the data.

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

5(c) Small Entity Flexibility

A majority of the affected facilities are large entities (e.g., large businesses). The proposed NSPS and Emission Guidelines were intended to cover CISWI units burning industrial solid waste, not combustors burning municipal solid waste. According to the final rule (65 FR 75348), approximately 29 percent of companies that own affected facilities may be small 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 to be 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.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Industry Burden - NSPS for Commercial and Industrial Solid Waste Incineration Units (CSWI) (40 CFR part 60, subpart CCCC) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. 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 11,246 (Total Labor Hours from Table 1) per year. These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS 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	\$100.99 (\$48.09 + 110%)
Technical	\$87.97 (\$41.89 + 110%)
Clerical	\$43.81 (\$20.86 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, “December 2005, Table 2. Civilian Workers, by Occupational and Industry group”. The rates are from column 1, “Total Compensation”. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

The types of industry cost associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup cost is a one-time cost when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent ¹	(C) Number of New Respondents	(D) Total Capital/Startup Cost (B X C)	(E) Annual O&M Costs for One Respondent ¹	(F) Number of Respondents with O&M	(G) Total O&M (E X F)
Wet Scrubber	\$2,240	1	\$2,240	\$211	30	\$6,330

¹ The capital/startup cost and O&M can be found in Table 1 under column “Non-labor costs per occurrence” and “Total non-labor costs per year”.

The total capital/startup costs for this ICR are \$2,240. This is the total of column D in the

above table. The total operation and maintenance (O&M) costs for this ICR are \$6,330. This is the total of column G. The total respondent costs have been calculated as the addition of the capital/startup costs and the annual operation and maintenance costs. The average annual cost for capital/startup and operation and maintenance cost to industry over the next three years of the ICR is estimated to be \$8,570.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs 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, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$9,521.

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

Managerial	\$57.20	(GS-13, Step 5, \$35.75 x 1.6)
Technical	\$42.45	(GS-12, Step 1, \$26.53 x 1.6)
Clerical	\$22.96	(GS-6, Step 3, \$14.35 x 1.6)

These rates are from the Office of Personnel Management (OPM) "2006 General Schedule" which excludes locality rates of pay.

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

There are approximately 31 respondents that are currently subject to the regulation. Each respondent has one affected facility.

Respondent Universe and Number of Responses Per Year						
Regulation Citation by Section	(A) Average Number of New Respondents per Year	(B) Number of Reports for New Sources	(C) Number of Existing Respondents Reporting	(D) Number of Reports for Existing Sources	(F) Number of Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses (AxB)+(Cx D)+F
Preconstruction Report	1	1	N/A	N/A	0	1
Startup Notification	1	1	N/A	N/A	0	1
Annual Report	N/A	N/A	30	1	0	30

Respondent Universe and Number of Responses Per Year						
Regulation Citation by Section	(A) Average Number of New Respondents per Year	(B) Number of Reports for New Sources	(C) Number of Existing Respondents Reporting	(D) Number of Reports for Existing Sources	(F) Number of Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses (AxB)+(CxD)+F
Deviation Report	N/A	N/A	3	2	0	6
Qualified Operator Deviation Notification	N/A	N/A	3	1	0	3
Qualified Operator Report	N/A	N/A	3	2	0	6
					Total	47

The number of total respondents is 31. This represents the number of existing sources plus the number of new sources averaged over the three-year period (i.e., the total of the number of new respondents over the three-year period divided by three years).

The number of Total Annual Responses is 47. This is the sum of column E of the Respondent Universe and Number of Responses Per Year table above.

The Total Hours Requested is 11,246. The total annual labor costs are \$1,021,351. Details regarding these estimates may be found below in Table 1: Annual Industry Burden and Cost - NSPS for Commercial and Industrial Solid Waste Incineration Units (40 CFR part 60, subpart CCCC) (Renewal).

Note that the total annual capital and O&M costs to the regulated entity are \$8,570. These costs are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

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.

(i) Respondents Tally

The annual burden for this collection of information is approximately 239 hours per response. The Total Hour burden is 11,246 and the total annual labor costs are \$1,021,351.

(ii) The Agency Tally

The average annual Agency cost during the three years of the ICR is estimated to be \$9,521.

6(f) Reasons for Change in Burden

There is no change in the total labor hours for the respondents in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent. Therefore, the burden hour figures in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR. However, there are some minor corrections due to calculation errors. There is an increase of one dollar in the total rounded labor cost to the respondents due to a calculation error in Table 1 of the previous ICR. There is an increase in the total number of responses, from 45 to 47, due to a calculation error in “Respondent Universe and Number of Responses Per Year” in the previous ICR; this results in a decrease in the per-response hour burden, from 250 to 239 hours per response.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 239 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA 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-2009-0537. 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 Avenue, N.W., 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 docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0537 and OMB Control Number 2060-0450 in any correspondence.

Part B of the Supporting Statement

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

Burden Item		(A) Respondent Hours per Occurrence (Technical hours)	Emission Testing Contractor Hours Per Occurrence	Non-Labor Costs Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondents Per Year ^a	(E) Technical Hours Per Year @\$87.97 (CXD) ^b	(F) Management Hours Per Year @\$100.99 (E x 0.05) ^b	(G) Clerical Hours Per Year @\$43.81 (E x 0.1) ^b	(H) Emission Testing Contractor Hours Per Year @ \$100 ^b	Total Labor Costs Per Year ^b
D.	Gather Information	Included in 3E										
E.	Report Preparation											
	1) Report prior to construction (includes siting analysis)	160	0	\$0	1	160	1	160	8	16	0	\$15,584.1
	2) Report prior to initial start-up ^{c,i}											
	a) Without site specific parameter petition	6	0	\$0	1	6	1	6	0.3	0.6	0	\$584.4
	b) With site specific parameter petition	14	0	\$0	1	14	0	0	0	0	0	\$0
	3) Report of initial performance test	Included in 3B										
	4) Siting analysis for new units only (establishes values for site-specific operating parameters). ^c	8	0	\$0	1	8	1	8	0.4	0.8	0	\$779.2
	5) Waste management plan ^c	160	0	\$0	1	160	1	160	8	16	0	\$15,584.1
	6) Annual Report:											
	a) Site specific operating parameters	8	0	\$0	1	8	30	240	12	24	0	\$23,376.1
	b) Emissions/parameter exceedances and malfunctions ^k	Included in 3E	0	\$0	1	0	3	0	0	0	0	\$0
	c) Results of stack tests conducted during the year	Included in 3B										
	d) Statement of no exceedances ^k	8	0	\$0	1	8	27	216	10.8	21.6	0	\$21,038.51
	e) Documentation of use of by-pass stack	Included in 6B										
	f) Documentation for periods when all qualified operators were unavailable for more than 8 hours	8	0	\$0	1	8	30	240	12	24	0	\$23,376.1
	7) Status report for operators that are off-site for more than 2 weeks ^j	8	0	\$0	1	8	3	24	1.2	2.4	0	\$2,337.6
	8) Corrective action summary for operators that are off-site for more than 2 weeks ^j	8	0	\$0	2	16	3	48	2.4	4.8	0	\$4,675.2

Burden Item		(A) Respondent Hours per Occurrence (Technical hours)	Emission Testing Contractor Hours Per Occurrence	Non-Labor Costs Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondents Per Year ^a	(E) Technical Hours Per Year @\$87.97 (CXD) ^b	(F) Management Hours Per Year @\$100.99 (E x 0.05) ^b	(G) Clerical Hours Per Year @\$43.81 (E x 0.1) ^b	(H) Emission Testing Contractor Hours Per Year @ \$100 ^b	Total Labor Costs Per Year ^b
G.	Time for Audits	Not applicable										
	Recordkeeping SUBTOTAL								1,032			\$87,368
TOTAL:							5,866	293	587	4,500		\$1,021,351
								Total Hours	Labor	Non-Labor		Total Labor and No-Labor
								11,246	\$1,021,351	\$8,570		\$1,029,921
							Summary of Respondent Burden		11,246	\$1,021,351	\$8,570	\$1,029,921

ASSUMPTIONS:

^a. We assume 700 hours per stack test

^b We assume that all tasks are to be performed by managerial, technical and clerical personnel. This ICR uses the following labor rates: \$100.99 for Managerial labor, \$87.97 for Technical labor and \$43.81 for Clerical labor. These rates are from the United States Department of Labor Bureau of Labor Statistics, "September 2005, Table 2 Civilian Workers, by Occupational and Industry group." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry. We also included contractors at \$100/hr. The labor rate was also taken from the above occupational and industry group under Blue-Collar occupation that covers Machine operators, and took the rates from column 1, "Total compensation."

^c. This activity is based on a one-time cost only.

^d Cost incurred by a facility regardless of the number of affected units at the plant.

^e. Based on the "Revised Testing and Monitoring Options and Costs for medical Waste Incinerators (MWIs) - Methodology and Assumptions (A-91-61,IV-B-66), was assumed that (\$300 will be for planning + \$500 for selection)/\$89.94 per hour = 9 hours.

^f Total capital cost of parameter monitoring for wet scrubbers minus costs for planning and selecting equipment (\$300 + \$500) equals: \$18,786 - \$800 = \$17,986. Based on 0.11746 capital recovery factor, 10 percent interest rate and 20 year lifetime of the units = \$2,113 with a 1.06 cost adjustment = \$2,240.

^g. Annual costs are not incurred until the second year that the units are in operation.

^h. Based on memorandum titled "Revised Testing and Monitoring Options and Costs for Medical Waste Incinerators (MWI's) - Methodology and Assumptions [A-91-61, IV-B-66]. 83 hours for reporting. Operation and maintenance costs - \$1,693 * 0.11746 = \$199. \$199 * 1.06 cost adjustment= \$211.

ⁱ We assume that one-third of the facilities will petition for site-specific parameters (6 x 33% = 2).

^j We assume that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year. We assume that this required only two corrective action summaries.

^k We assume that 10 percent of the facilities would have an exceedance during the year.

TABLE 2: Annual EPA Burden - NSPS for Commercial and Industrial Solid Waste Incineration Units (40 CFR part 60, subpart CCCC) (Renewal)

BURDEN ITEMS		(A) Hours Per Occurrences	(B) Number of Occurrence Per Year	(C) Tech Hours Per Year @ \$42.45 (C=AxB) ^a	(D) Management Hours Per Year @ \$57.20 (D=Cx0.05) ^a	(E) Clerical Hours Per Year @ \$22.96 (E=Cx0.1) ^a	(F) Cost Per Year (b) ^e
1. Applications		N/A					
2. Read and Understand Rule Requirements ^{a&c}		16	0	0	0	0	\$0
3. Required Activities							
A.	Observe initial stack tests ^{b&c} (PM, dioxins/furans, opacity, HCl, Cd, Pb, Hg, CO, NOx, and SO ₂)	48	0	0	0	0	\$0
B.	Create Information	N/A					
C.	Gather Information	N/A					
D.	Report Reviews						
	1) Review control plan ^c	8	0	0	0	0	\$0
	2) Review notification of final compliance ^c	8	0	0	0	0	\$0
	3) Review waste management plan ^c	8	0	0	0	0	\$0
	4) Review initial stack test report ^c	40	0	0	0	0	\$0
	5) Review annual compliance report	8	0	0	0	0	\$0
	6) Review semi-annual excess emission and parameter exceedance report	16	0	0	0	0	\$0
	7) Review status reports and corrective action summary for operators off-site	4	0	0	0	0	\$0
E.	Prepare annual summary report ^d	4	50	200	10	20	\$9,521
	TOTAL			200 ^f	10 ^f	20 ^f	\$9,521

Assumptions:

a. Costs are based on the following rates obtained from the Office of Personnel Management (OPM) "2006 General Schedule" which excludes locality rates of pay: 1) Managerial at \$57.20, 2) Technical at \$42.45, and 3) Clerical at \$22.96 per hour. These rates are increased by 1.6 benefits multiplication factor to account for government overhead expenses.

b. Time required to observe initial stack tests (hours per plant): 48

c. This is a one-time only cost.

d. We assume that each state will prepare an annual summary of progress for implementing the state plan. One occurrence per year x 50 states = 50 occurrences.

e. Total costs per year may not correspond with the end total, this is due to the number being rounded. Total cost per year: \$8,858.

f. Total number of EPA hours per year: 230

