

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**Emission Guidelines for Commercial and Industrial Solid Waste Incineration Units (40 CFR Part 60, Subpart DDDD) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

Emissions Guidelines for Commercial and Industrial Solid Waste Incineration Units (40 CFR Part 60, Subpart DDDD) (Renewal), EPA ICR 1927.05; OMB Control Number 2060-0451

**1(b) Short Characterization/Abstract**

The Emission Guidelines for Commercial and Industrial Solid Waste Incineration (CISWI) Units were promulgated on December 1, 2000. The guidelines (standards) apply to solid waste incinerators in 40 CFR part 60, subpart DDDD. These standards fulfill the requirements of sections 111 and 129 of the Clean Air Act (CAA). This subpart affects the administrator of an air quality program in a state, or United States protectorate with one or more existing CISWI units that commenced construction on or before November 30, 1999.

The emissions guidelines require: a one-time waste management plan; initial performance tests for ten pollutants; annual performance testing for particulate matter (PM), hydrogen chloride (HCl), and opacity; continuous operating parameter monitoring; annual operator training; and annual reporting. A semiannual deviation report is required if any of the emission limitations or operating limits are exceeded. The frequency of these activities was chosen by the United States Environmental Protection Agency (EPA) as the period that will provide an adequate margin of assurance that affected facilities will not operate for extended periods in violation of the standards.

This supporting statement addresses information collection activities imposed by the Emission Guidelines for Commercial and Industrial Solid Waste Incineration (CISWI) Units, subpart DDDD. The guidelines do not apply directly to CISWI unit owners and operators. The guidelines are implemented through the State Implementation Plans (SIP), written by the states. If a state does not develop, adopt, and submit an approved state plan, and if a state's plan is not approved, the EPA must promulgate a Federal Implementation Plan to implement the emission guidelines in a state without its own SIP.

The information will be used by enforcement and compliance authorities to ensure that the requirements of the state, or Federal plans are implemented and the subject facilities comply with the plans on a continuous basis. Specifically, the information will be used by the authorities to: (1) identify existing sources subject to the standards; (2) ensure those existing sources have a control plan to achieve compliance by the final compliance date; (3) ensure that subpart DDDD is being properly applied; (4) ensure that the emission standards are being complied with; and (5) ensure, on a continuous basis, that the operating parameters established during the initial

stack test are not exceeded.

In addition, records and reports are necessary to enable the authorities to identify CISWI units that are not in compliance with the standards. Based on reported information, the designated administrator can decide which CISWI units should be inspected and what records or processes should be inspected at the CISWI unit. The records that CISWI units maintain would indicate to the Administrator whether personnel are operating and maintaining the control equipment properly and whether they have met the qualification requirements. In more than 95 percent of the cases, the enforcement of emission guidelines has been delegated to the state air pollution control agencies. In such cases, the reports required by the standards will be submitted to the appropriate state agency, and not directly to the EPA. Thus, there is a minimal possibility for the duplication of information to state agencies and EPA. In those few cases where state agencies have not developed a state plan or requested delegation of the Federal plan, Federal enforcement requires information from the CISWI facility. The plant owner, or operator may submit a copy of state, or local reports to the EPA Administrator in lieu of the report required by the standards, as specified in the General Provisions of 40 CFR part 60.

This rule requires all records to be maintained at the source for a period of five years. These records must be kept on file for use of the regulating authority to ensure that the plant personnel are operating and maintaining control equipment properly.

There are approximately 97 respondents that will be subject to the standard in the next three years. The previous Information Collection Request (ICR) assumed that the facilities regulated under the Emission Guidelines are owned by “business or other for-profit,” Federal, and “State, Local; or Tribal Government.” Recent data indicate that the ownership is limited to the private industry. The average annual labor cost of this ICR is \$2,884,100.

The Office of Management and Budget (OMB) approved the current ICR without any “Terms of Clearance.”

The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost - Emission Guidelines for Commercial and Industrial Solid Waste Incineration Units (40 CFR Part 60, Subpart DDDD) (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: Average Annual EPA Burden - Emission Guidelines for Commercial and Industrial Solid Waste Incineration Units (40 CFR Part 60, Subpart DDDD) (Renewal).

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under section 111(d)(1) of the Clean Air Act (CAA), as amended, to:

... prescribe regulations which shall establish a procedure similar to that provided by section 110 under which each State shall

submit to the Administrator a plan which (A) establishes standards of performance for any existing source for any air pollutant (i) for which air quality criteria have not been issued or which is not included on a list published under section 108(a) . . . but (ii) to which a standard of performance under this section would apply if such existing source were a new source, and (B) provides for the implementation and enforcement of such standards of performance.

The EPA is required under section 129 of the Act, to establish guidelines for existing stationary sources that reflect the maximum achievable control technology (MACT) for achieving continuous emission reductions:

Section 129(a)(1)(A) states:

The Administrator shall establish performance standards and other requirements pursuant to section 111 and this section for each category of solid waste incineration units. Such standards shall include emissions limitations and other requirements applicable to new units and guidelines (under section 111(d) and this section) and other requirements applicable to existing units.

Section 129(a)(2) states:

Standards applicable to solid waste incineration units promulgated under section 111 and this section shall reflect the maximum degree of reduction in emissions of air pollutants listed under section (a)(4) that the Administrator, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable for new or existing units in each category.

Section 129(b)(1) states:

Performance standards under this section and section 111 for solid waste incineration units shall include guidelines promulgated pursuant to section 111(d) and this section applicable to existing units. Such guidelines shall include, as provided in this section, each of the elements required by subsection (a) (emissions limitations, notwithstanding any restriction in section 111(d) regarding issuance of such limitations), subsection (c) (monitoring), subsection (d) (operator training), subsection (e) (permits), and subsection (h)(4) (residual risk).

Subpart B of 40 CFR part 60 requires state plans to include monitoring, recordkeeping, and reporting provisions consistent with the emission guidelines. In addition, section 114(a)(1)

states that:

the Administrator may require any person who owns or operates any emission source, who manufactures emission control equipment or process equipment, who the Administrator believes may have information necessary for the purposes set forth in this subsection, or who is subject to any requirement of this Act (other than a manufacturer subject to the provisions of section 206(c) or 208 with respect to a provision of title II) on a one-time, periodic or continuous basis 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; . . . .

Certain reports are necessary to enable the regulatory agencies to identify existing sources subject to the state plan that implements the emission guidelines and to determine if the standards are being achieved. Therefore, the emission guidelines were promulgated for this source category at 40 CFR part 60, subpart DDDD.

## **2(b) Practical Utility/Users of the Data**

The information will be used by EPA, state, or local enforcement personnel to ensure that the requirements of the state or Federal plan are being implemented and the subject facilities comply with the requirements of the plans on a continuous basis. Specifically, the information will be used to: (1) identify existing sources subject to the standards; (2) ensure that those existing sources have a control plan to achieve compliance by the final compliance date; (3) ensure that subpart DDDD is being properly applied; (4) ensure that the emission standards are being complied with; and (5) ensure, on a continuous basis, that the operating parameters established during the initial performance test are not exceeded.

In addition, records and reports are necessary to enable the authorities to identify CISWI units that may not be in compliance with the standards. Based on reported information, the authorities can decide which CISWI units should be inspected and what records or processes should be inspected at the CISWI unit. The records that CISWI units maintain would indicate to

the authorities whether the personnel are operating and maintaining control equipment properly and whether they have met the qualification requirements.

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

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

#### **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 to the delegated state, or local agency. If a state, or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state, or a local agency can be sent to the Administrator in lieu of the report requirement 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 97 respondents are currently subject to the regulation. The Agency estimates that there will not be any industry growth in 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.

In addition, it is our policy to review any comments received since the last ICR renewal including those submitted in response to the First Federal Register Notice and respond appropriately. No comments were received for this ICR.

#### **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 on a less frequent basis, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

### **3(e) General Guidelines**

None of these reporting or recordkeeping requirements violates 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 the reporting, or recordkeeping requirements contains sensitive questions.

## **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 could be found in the following table:

<b>Standard</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Emission Guidelines for Commercial and Industrial Solid Waste Incineration Units (40 CFR, part 60, subpart DDDD)		
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	321
Manufacturers of wholesale trade, durable goods	25	337
Law enforcement agencies	9229	922
Department of Defense (labs, military bases, munition facilities)	9711	928
Research centers	8221	6113

#### **4(b) Information Requested**

##### **(i) Data Items**

All data in this ICR that are recorded and/or reported are required by the Emission Guidelines for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR part 60, subpart DDDD).

A source must make the following reports:

<b>Notification Reports</b>	<b>Standard Citation by Section</b>
Notification of final control plan	60.2600(a)
Notification of final compliance	60.2605
Submit waste management plan	60.2755
Notification of initial and subsequent performance tests	60.2760
Notification of closure	60.2615
Annual report	60.2765 and 60.2770
Emission limitation or operating limit deviation report	60.2775, and 60.2780
Qualified operator deviation notification	60.2785(a)(1)

<b>Notification Reports</b>	<b>Standard Citation by Section</b>
Status Report for operators that are off-site more than two weeks	60.2785(a)(2)
Notification of resumed operation	60.2785(b)
Notification until increment is met	60.2595

A source must keep the following records:

<b>Recordkeeping</b>	
Records of initial performance tests, annual performance tests, and any subsequent performance tests.	60.2740(f)
Maintain records of days for which data on operating parameters have been obtained. Includes a list of operating parameters not measured, reason for not measuring, and a description of corrective actions taken.	60.2740(c)
Maintain records of occurrence and duration of any malfunction and the corrective action taken.	60.2740(d)
Maintain records of days when deviation from operating limits has occurred, and description of corrective actions taken.	60.2740(e)
Maintain records of names of persons who have completed review of site-specific information and incinerator operating procedures.	60.2740(g) and 60.2660(c)
Maintain records of names of persons who have completed the operator training requirements.	60.2740(h)
Maintain records of phone and/or pager numbers of persons who have met the operator qualification criteria.	60.2740(i)
Maintain records of calibration of monitoring devices.	60.2740(j)
Maintain records of equipment vendor specifications for the incinerator, emission controls, and monitoring equipment.	60.2740(k)
Maintain records of daily log of quantity and types of waste burned.	60.2740(m)
Maintain records of site-specific information and incinerator operation procedures.	60.2660(c)
Maintain records of operating parameters.	60.2740(b)
Maintain calendar date of each record.	60.2740(a)
Retain records for five years.	60.2740



## Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., leaks and spills of mercury). Personnel at the source will 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 reduces 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**

<b>Respondent Activities</b>
Read instructions.
Install, calibrate, maintain, and operate control devices for, PM, HCl, and opacity.
Perform initial and annual performance tests.
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.
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.

<b>Agency Activities</b>
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Air Facility System.
Observe compliance tests (optional)

### **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 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.

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**

An exact number of small entities affected by this rule could not be determined based on review of available documentation. According to the Final Rule (68 FR 57517):

During the 2000 CISWI emission guidelines rulemaking, the EPA determined that based on the low number of affected small entities in each individual market, the alternative method of waste disposal available, and the relatively low control cost, the CISWI emission guidelines should not generate a significant small business impact on a substantial number of small entities in the commercial and industrial sectors.

A majority of the affected facilities are large entities (e.g., 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 rules contain several provisions that reduce the impact of the rule on all regulated entities which includes small entities. These are:

- 1..Annual performance testing is only required for three pollutants rather than the full ten pollutants included in the initial performance tests.
- 2..Operating parameter monitoring is required instead of continuous emissions monitoring systems (CEMS).
- 3..The owner or operator is allowed to skip two annual performance tests for a pollutant if all performance tests over the previous three years show compliance.
- 4, Deviation reports are only required if there is a deviation, otherwise reporting is annual.

#### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost - Emissions Guidelines for Commercial and Industrial Solid Waste Incineration Units (40 CFR part 60, subpart DDDD) (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 a 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 31,619 hours (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the Emissions Guidelines 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: \$100.99 per hour for Executive, Administrative, and Managerial labor, \$87.97 per hour for Technical labor, and \$43.81 per hour for Clerical labor. 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 have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

	Managerial	\$100.99	(\$48.09 + 110%)
Technical		\$87.97	(\$41.89 + 110%)
	Clerical	\$43.81	(\$20.86 + 110%)

### (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 cost associated with continuous monitoring. The capital/startup costs are 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

(A) Capital/Startup Cost for One Respondent <sup>1</sup>	(B) Number of Initial Respondents <sup>2</sup>	(C) Total Capital/Startup Cost (A x B)	(D) Annual O&M Costs for One Respondent <sup>3</sup>	(E) Number of Respondents with O&M <sup>2</sup>	(F) Total O&M, (E x F)	(G) Total (C + F)
\$2,240	0	\$0	\$211	97	\$20,467	\$20,467

<sup>1</sup> The capital/startup costs and O&M could be found in Table 1 under column “Non-labor costs per occurrence per respondent” and “Total non-labor costs per year”. Section 3B(1e) and (2d).

<sup>2</sup> See Section 6(d) for calculation.

<sup>3</sup> We assume that the annual O&M cost are \$211 per year.

The total capital/startup costs for this ICR are zero. This is the total of column C in the above table. The total operation and maintenance (O&M) costs for this ICR are \$20,467. This is the total of column F. 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 this ICR is estimated to be \$20,467.

### 6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA 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 \$46,463 (rounded). This cost is based on the average hourly labor rate at a GS-12, Step 1, times 1.6 benefits multiplication factor to account for government overhead expenses. The rates are 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, \$114.35 x 1.6)

These rates are from the Office of Personnel Management (OPM) “2006 General Schedule” which excludes locality rates of pay. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden - Emissions Guidelines for Commercial and Industrial Solid Waste Incineration Units (40 CFR part 60, subpart DDDD) (Renewal).

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

As shown above, the average Number of Respondents over the three-year period of this ICR is 97.

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of Initial Respondents	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents with Initial Requirements	(E) Number of Respondents (E=A+B+C-D)
Average	0	97	0	0	97

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

<b>Total Annual Responses</b>					
(A) Number of Initial Respondents	(B) Number of Reports for Initial Respondents	(C) Number of Existing Respondents	(D) Number of Reports for Existing Respondents	(F) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(A \times B) +$ $(C \times D)$
0	0	97	1.4 <sup>1</sup>	0	136 (Rounded)

<sup>1</sup> Each existing respondent submits an annual report. 10 percent submit an operator status notification of resumed operation. 10 percent submit status report for operators that are off-site for more than two weeks. 10 percent submit a corrective action summary report. 10 percent submit a semiannual exceedance report. Total number of reports per respondent is 1.4 per year.

The number of Total Annual Responses from the 97 respondents is 136. The Total Hours Requested is 31,619. The total annual labor costs are \$2,884,100. Details of the labor cost estimates may be found below in Table 1: Annual Respondent Burden and Cost - Emission Guidelines for Commercial and Industrial Solid Waste Incineration Units (40 CFR part 60, subpart DDDD) (Renewal).

Note that the total annual capital and O&M costs to the regulated entity are \$20,467. 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 bottom line burden hours and cost tables for both the Agency and the respondents are attached. The annual public reporting and recordkeeping burden for this collection of information is estimated to average 232 hours per response.

### **6(f) Reasons for Change in Burden**

There is no change in the cost to the respondents in this ICR compared to the previous ICR. This is due to two considerations: (1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and (2) the growth rate for the respondents is very low, negative or non-existent. Therefore, the cost figures in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR. There is, however, a decrease of one hour in the total labor hours to the respondent in this ICR due to rounding.

In accordance with the Paperwork Reduction Act, actions related to case development activities have been removed from the Agency cost figures. Therefore, the cost to the Agency as reported in this ICR has been reduced.

**6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 232 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-2009-0542. 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-2009-0542 and OMB Control Number 2060-0451 in any correspondence.

**Part B of the Supporting Statement**

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









labor and \$43.81 for Clerical labor. 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 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. 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), the assumption is 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 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. Respondents make one combined annual report per year.

h. Based on memorandum titled "Revised Testing and Monitoring Options and Costs for Medical Waste Incinerators (MWIs) - Methodology and Assumptions [A-91-61, IV-B-66], the respondents spend 83 hours for reporting; operation and maintenance costs - \$1,693 x 0.11746 = \$199; \$199 x 1.06 cost adjustment = \$211.

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

j. Assume that 10 percent of the facilities would have an exceedance during the year.

k. Assume that the average cost for contractor is \$100.00 per hour.

**TABLE 2: Average Annual EPA Burden - Emission Guidelines for Commercial and Industrial Solid Waste Incineration Units (40 CFR Part 60, Subpart DDDD)**

BURDEN ITEMS		(A) Hours Per Occurrences	(B) Number of Occurrence Per Year <sup>a</sup>	(C) Tech Hours Per Year @ \$42.45 (C = A x B) <sup>b</sup>	(D) Management Hours Per Year @ \$57..20 (D = C x 0.05) <sup>b</sup>	(E) Clerical Hours Per Year @ \$22.96 (E = C x 0.1) <sup>b</sup>	(F) Cost Per Year
1.	Applications	N/A					
2.	Read and Understand Rule Requirements	16	0	0	0	0	\$0
3.	Required Activities						
	Report Reviews						
	1) Review control plan	8	0	0	0	0	\$0
	2) Review notification of final compliance	8	0	0	0	0	\$0
	3) Review waste management plan	8	0	0	0	0	\$0
	4) Review initial stack test report	40	0	0	0	0	\$0
	5) Review annual compliance report	8	97	776	38.8	77.6	\$36,942.22
	6) Review semi-annual excess emission and parameter exceedance report	16	10	160	8	16	\$7,616.96
	7) Review status reports and corrective action summary for operators off-site	4	10	40	2	4	\$1,904.24
	<b>TOTAL</b>				1,122 (rounded)		\$46,463 (rounded)
<p>Assumptions:</p> <p>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 and multiplied by 1.6 to account for government overhead expenses: 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.</p> <p>b. We assume that 10 percent of the facilities will have exceedance reports and operator off-site reports.</p> <p>c. 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.</p> <p>d. We assume that 10 percent of the compliance tests (annual or initial) are observed, and that it takes 48 hours each.</p>							