

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

Emission Guidelines for Existing Sources: Sewage Sludge Incineration (SSI) Units  
(Subpart M MMMM)

**1. IDENTIFICATION OF THE INFORMATION COLLECTION**

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

"Emission Guidelines for Existing Sources: Solid Sludge Incineration (SSI) Units (Subpart M MMMM)."

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

This supporting statement addresses information collection activities imposed by the Sewage Sludge Incineration (SSI) Unit Emission Guidelines Subpart M MMMM. The guidelines do not apply directly to SSI unit owners and operators. The guidelines can be thought of as model regulations that States use in developing State plans to implement the emission guidelines. If a State does not develop, adopt, and submit an approvable State plan, the Environmental Protection Agency (EPA) must develop a Federal plan to implement the emission guidelines. Whether a SSI unit is ultimately regulated under a State plan or Federal plan, the full respondent burden for the first 3 years after promulgation of the emission guidelines is included in this information collection request (ICR).

The use of the term "Designated Administrator" throughout this document refers to the person or office designated by each State plan to administer the implementation of the plan, or to the U.S. EPA Administrator in the event that a State's plan is not approvable and a Federal plan must be developed. The term "Administrator" alone refers to the U.S. EPA Administrator.

This ICR includes the burden for activities that will be conducted in the first three years following promulgation of the proposed emission guidelines. These activities include reading the rule, submitting a control plan, initial stack testing, establishing operating parameters, and monitoring, recordkeeping, and reporting requirements. We realize, however, that some facilities may not incur these costs within the first three years, and may incur them during the fourth or fifth year instead. Therefore, this ICR presents a conservatively high burden estimate for the initial three years following promulgation of the proposed emission guidelines.

This ICR presents the burden to respondents (owners or operators of SSI units) and the Designated Administrator (State or Federal Government) that will be imposed by State plans developed to implement the emission guidelines. Respondents are owners or operators of existing SSI units.

The requirements described below are the minimum requirements established by the emission guidelines. Although States may choose to impose more stringent requirements, it is assumed for this burden estimate that the State plans mirror the emission guidelines.

Sewage Sludge Incinerators are categorized into fluidized bed or multiple hearth units. For fluidized bed SSI units, 55 units at 40 facilities would be affected by the proposed standards; for multiple hearth SSI units, 163 units at 73 facilities would be affected. Upon promulgation of the proposed standards, however, we anticipate that affected SSI units owned by small entities will be shut down, and that these facilities will use alternative, less expensive means of disposal instead. The remaining units that would be subject to the regulation over the next three years will therefore comprise 46 fluidized bed units at 32 facilities and 151 multiple hearth units at 63 facilities. One of these facilities has both a multiple hearth and a fluidized bed unit, so 94 facilities in all are expected to be subject to the regulation. The cost of this Information Collection Request (ICR), based on these 197 units at 94 facilities, will be \$42.7 million.

The burden to the “Affected Public” for each SSI subcategory may be found in Tables 1 - 3 in Attachment 2. This rule affects respondents in both the public and private sectors. The burden to the “Designated Administrator” is attributed entirely to work performed by federal employees or government contractors; this burden may be found in Tables 4 - 7 of Attachment 3.

## **2. AUTHORITY/NEED FOR AND USE OF THE COLLECTION**

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

The EPA is charged under section 111(c) of the Clean Air Act (Act), as amended, to establish procedures by which:

. . .each State shall submit to the Administrator a plan which (A) establishes standards of performance for any existing source for any air pollutant. . .to which a standard of performance 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) states:

The Administrator shall establish performance standards and other requirements pursuant to section 111 and this section of 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 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 or who is 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 or methods, (D) sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Administrator shall prescribe), and (E) provide such other information, as he may reasonably require.

Certain reports are necessary to enable a Designated Administrator to identify existing sources subject to the State plan that implements the emission guidelines and to determine if the standards are being achieved.

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

The information will be used by Designated Administrators' enforcement personnel to ensure that the requirements of the State (or Federal) plan are being implemented and are complied with on a continuous basis. Specifically, the information will be used by the Designated Administrator to: (1) identify existing sources subject to the standards; (2) ensure that existing sources have a control plan to achieve compliance by the final compliance date; (3) ensure that subpart MMMM is being properly applied; (4) ensure that the emission standards are being complied with; (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 Designated Administrator to identify SSI units that may not be in compliance with the standards. Based on reported information, the Designated Administrator can decide which SSI units should be inspected and what records or processes should be inspected at the SSI unit. The records that SSI units

maintain would indicate to the Designated Administrator whether the personnel are operating and maintaining control equipment properly and whether they have met the qualification requirements.

### **3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

The requested recordkeeping and reporting will be required under (40 CFR part 60, subpart M).

#### **3(a) Nonduplication**

This ICR contains reporting and recordkeeping requirements for SSI units, whether regulated under a State plan or Federal plan. The information collected in the first 3 years following promulgation of the proposed emission guidelines consists of a control plan as well as initial and ongoing compliance information. This information collection amends the information collection requirements currently collected for SSI units by EPA or any other Federal agency.

Other activities, such as performance tests and performance test reports, installation of monitoring systems and control devices, operator training, and monitoring of operating parameters, do not typically occur until 4 or 5 years after promulgation. We are estimating these burdens will occur within the first three years after promulgation of the proposed emission guidelines to be conservative in our estimates.

In more than 95 percent of the cases, the enforcement of emission guidelines has been delegated to 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 submittal of duplicate 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 still requires information from the SSI facility. The plant owner or operator may submit a copy of State or local reports to the Administrator in lieu of the report required by the standards, as specified in the General Provisions of 40 CFR part 60.

#### **3(b) Public notice prior to ICR submission to OMB**

A public notice of this collection is being provided in the Federal Register notice of proposed rulemaking published for the emissions guidelines.

#### **3(c) Consultations**

The public has the opportunity to review and comment on the proposed emission guidelines and ICR during the public comment period.

#### **3(d) Effects of Less Frequent Data Collection**

The emission guidelines require a one-time control plan report, a one-time final compliance report, initial performance tests for ten pollutants, annual performance testing, continuous operating parameter monitoring, annual operator training, and annual reporting (a deviation report is required if any of the emission limitations or operating limits are exceeded). The frequency of these activities was chosen by 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.

The control plan is submitted in the first 3 years after promulgation of the emission guidelines. The one-time control plan will allow the Designated Administrator to determine whether the owner or operator has an adequate strategy for achieving compliance with the emission guidelines by the final compliance date. The other activities take place after the compliance date, which will be in the fifth year after promulgation for most facilities. The final compliance report notifies the Designated Administrator that the owner or operator has achieved compliance with the emission guidelines.

Annual reporting allows the submittal of required information and data parameters so that any potential problems can be identified in a timely fashion. A deviation report is required for deviations from the operating limits and the emission limitations so that the Designated Administrator can ensure that rapid corrective action is being taken.

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

With the exception of requiring records to be maintained for more than 3 years, none of the guidelines in CFR 1320.5 are being exceeded. This rule requires all records to be maintained at the source for a period of 5 years. In 40 CFR part 63, subpart A, "General Provisions for National Emission Standards for Hazardous Air Pollutants for Source Categories," owners or operators of facilities are required to keep and maintain records for a period of 5 years. These records must be kept on file for use, if needed, by the regulating authority to ensure that the plant personnel are operating and maintaining control equipment properly. Under section 129 of the Act, SSI facilities are subject to similar MACT-based regulations, therefore, this 5-year record retention requirement was adopted for SSI facilities. Furthermore, section 129 requires all SSI units to obtain title V operating permits under part 70 or 71 permit programs. The title V permit programs also require records to be retained for 5 years. These records must be kept on file for use, if needed, by the regulating authority to ensure that the plant personnel are operating and maintaining control equipment properly.

### **3(f) Confidentiality**

All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976, amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

### **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**

Respondents are owners or operators of SSI units for which construction commences on or before the date of proposal publication in the Federal Register. These standards affect any industry using a sewage sludge incinerator as defined in the regulation. This includes North American Industry Classification System (NAICS) Code 221 (Sewage Treatment Facilities and Water Treatment Plants), among others.

Based on the distribution of facilities with affected sewage sludge incinerators and the expectation that small entities will shut down their units, there are 94 existing facilities which will be affected. Of these, 97 percent are located in the public sector and the remaining 3 percent are located in the private sector.

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

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

Attachment 1, Source Data and Information Requirements, and Tables 1 and 2 of Attachment 2 present a summary of the recordkeeping and reporting requirements of this regulation.

###### **(ii) Respondent Activities**

The respondent activities required by the standards are provided under the first column of Tables 1 and 2 of Attachment 2, introduced in section 6(a). All burden items are included in these tables.

###### **(iii) Summary of Requirements**

The information collection activities in this ICR include the preparation and submittal of the final control plan along with initial and ongoing compliance activities. The one-time control plan will allow the Designated Administrator to determine whether the owner or operator has an adequate strategy for achieving compliance with the emission guidelines.

Other information collection activities included in the emission guidelines may occur within the first three years, and are presented in this burden estimate, but may not occur until 4 or 5 years following promulgation of the proposed standards for some affected sources. To be conservative in our estimate, the burden for these items is included in this ICR. These items

include: performance tests, operating parameter monitoring, operator training, one-time and periodic reports, and the maintenance of records.

The regulation requires an initial performance test for the following pollutants: PM, dioxins/furans, opacity, HCl, Cd, Pb, Hg, CO, NO<sub>x</sub>, SO<sub>2</sub>, and fugitive ash. During the initial performance test the owner or operator must establish limits for each operating parameter. Thereafter, the owner or operator must conduct annual performance tests and continuously monitor the operating parameters. The rule allows the owner or operator to skip two annual performance tests for PM, HCl, opacity, or fugitive ash emissions if all performance tests over the previous 3 years show compliance with the emission limit.

To ensure the proper operation of the incinerator, the rule requires that each facility have at least one qualified SSI unit operator or supervisor. The operator qualification process includes training, an exam, and review of site-specific materials. The operator qualification requirements allow the flexibility to use State-approved training and qualification programs. To maintain qualification operators or supervisors must attend an annual refresher course and review site-specific materials annually.

Following the initial performance test, the owner or operator must submit a report that documents the performance test and the values for their operating limits.

An annual report is required that documents: the values for the operating limits; any deviations or malfunctions; the results of any performance tests; if no deviations occurred, a statement that no deviations occurred; and documentation of periods when all qualified operators were unavailable for more than 8 hours.

If the operating limits or emission limitations are exceeded, the owner or operator must submit a deviation report that provides details on the deviation.

Owners or operators of SSI units are required to keep records of certain parameters and information for a period of 5 years. Owners or operators are required to maintain records of the initial performance test, annual performance tests, and any subsequent performance tests. Owners or operators must also maintain records of the monitoring data for the operating parameters.

Records must be maintained for any incinerator malfunctions, any deviations from the operating limits, and days for which the minimum amount of operating parameter data were not obtained.

Owners or operators must maintain the names of persons who have completed the review of site-specific information and who have met the operator qualification requirements.

Records must also be maintained of all documentation for monitoring device calibration and site-specific documentation.

All reports are to be submitted to the Designated Administrator. The information will be used to determine that all sources subject to the emission guidelines are achieving the requirements.

## **5. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION, METHODOLOGY, AND INFORMATION MANAGEMENT**

### **5(a) Agency Activities**

A list of Agency activities is provided in section 6(c) and in Tables 4 through 7 of Attachment 3.

### **5(b) Collection Methodology and Management**

This collection of information does not require the use of automated collection techniques because of the relatively small number of respondents affected. See section 5(d) Collection Schedule.

### **5(c) Small Entity Flexibility**

Based on Small Business Administration guidelines, approximately 18 small entities are affected by this rule. The EPA does not expect the standards to have a significant small business impact.

The EG does not contain any provisions reserved exclusively for the benefit of small entities. However, the EG does contain provisions that reduce the impact on all regulated entities, which would include any small entities. The owner or operator is allowed to skip two annual performance tests for PM, HCl, opacity, or fugitive ash emissions if all performance tests over the previous three years show compliance. Deviation reports are required only if there is a deviation, otherwise reporting is annual, and operating parameter monitoring is required instead of continuous emissions monitoring systems (CEMS).

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

In the first three years following promulgation of the emission guidelines owners or operators would read the rule and are required to submit a one-time control plan. As discussed earlier, we also anticipate many of the one-time activities, including: initial performance tests (PM, dioxins/furans, opacity, HCl, Cd, Pb, Hg, CO, NO<sub>x</sub>, SO<sub>2</sub>, fugitive ash), initial operator training and qualification, and report following initial performance test (includes operating parameter values) to occur for many facilities within the first three years, but they may occur in years 4 or 5. These data will be entered into the Aerometric Information Retrieval System (AIRS), operated and maintained by EPA's Office of Air Quality Planning and Standards.



Annual performance tests are required for each subcategory of SSI. Continuous parameter monitoring, with the option of using CEMS, is required. An annual operator training refresher course and site-specific information review is required.

An annual report is required that includes data on the operating parameters, performance test results, identification of deviations and malfunctions, and documentation of periods when all qualified operators were unavailable for more than 8 hours.

Additionally, if the operating limits or emission limitations are exceeded, the owner or operator must submit a deviation report that provides details on the deviation. Information obtained from annual compliance reports will be published and distributed through the compliance data system (CDS). Data obtained during periodic visits by EPA personnel from records maintained by the respondents will be tabulated and published for internal EPA use in compliance with enforcement programs.

## **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

Tables 1 and 2 of Attachment 2 document the computation of individual burdens and non-labor costs for the recordkeeping and reporting requirements applicable to the industry for each year 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. Table 3 of Attachment 2 presents a summary of the agency burden.

### **6(a) Estimating Respondent Burden**

Upon promulgation of the proposed standards, we anticipate that some of the affected SSI units will begin to be shut down and facilities will utilize alternative means of disposal instead. The baseline population of 197 existing SSI units at 94 facilities is based upon our estimates of how many units would remain operating instead of shutting down.

For the burden estimate, due to the fact that one facility has both a multiple hearth and fluidized bed unit, the number of fluidized bed facilities is reduced from 32 to 31 in the calculations to eliminate double counting at the facility level. This has no bearing on unit level costs.

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 21,900 hours. The average annual recordkeeping hours shown in Tables 1 and 2 of Attachment 2 are 2,000 and the reporting requirement hours are 19,900.

### **6(b) Estimating Respondent Costs**

The information collection activities for sources subject to these requirements are presented in Tables 1 and 2 of Attachment 2. The total cost for each respondent activity includes labor costs, capital/startup costs, and operating and maintenance (O&M) costs.

**(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$92.77 (\$43.44 + 110%)*1.017
Technical	\$57.22 (\$26.79 + 110%)*1.017
Clerical	\$35.24 (\$16.50 + 110%)*1.017

These rates are taken from the Bureau of Labor Statistics, Occupational Employment Statistics, May 2009 National Industry-Specific Occupational Employment and Wage Estimates for NAICS 999300 - Local Government categories. The occupational categories that are the most similar to personnel operating SSI unit operations are assumed to be Engineering Technicians, except Drafters, all other (17-3029), General and Operations Managers (11-1021), and Secretaries, except Legal, Medical, and Executive (43-6014). The labor rates are adjusted with an average fringe benefit and overhead rate addition of 110 percent times the base rate to account for paid leave, insurance, etc. Since the labor rates are from May 2009, an Employment Cost Index (ECI) factor of 1.017 was also used to adjust the rates to March 2010 to give a current rate. Therefore, the total loaded wage rates are calculated by the following equation:

$$(\text{Base labor rate} + (\text{Base labor rate} \times 1.10)) \times \text{ECI factor} = \text{Loaded labor rate}$$

For emission testing labor rates, a nominal labor rate of \$80.00 per hour is used. This labor rate reflects the current loaded labor rate for emission testing contractors and includes fringe benefits and overhead, as well as the additional equipment costs needed to perform emission tests and analyze gas samples.

**(ii) Estimating Capital/Start-up and Operation and Maintenance Costs**

The capital costs associated with the proposed emission guidelines include a file cabinet for storing copies of records and reports, and monitoring system initial costs; one time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors, conduct initial and subsequent annual testing, and other costs such as photocopying and postage. As discussed earlier, we have estimated the burden if these occurred within the first three years, but realize that some facilities may incur these costs within years 4 or 5.

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

Below are the estimated capital and startup costs and O&M costs for the affected units for the first 3 years after promulgation.

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>				
(A) SSI Unit Type	(B) Number of Respondents (facilities)	(C) Total Capital/Startup Costs	(D) Total Annualized Capital/Start-up and O&M over 3 years	(E) Average Annual Capital/Startup and O&M Costs
Fluidized Bed	31	\$970,000	\$10,700,000	\$3,600,000
Multiple Hearth	63	\$860,000	\$28,300,000	\$9,400,000
Total	94	\$1,830,000	\$39,000,000	\$13,000,000

The total capital/startup costs for this ICR are \$1.8 million.

The total annualized capital/startup and O&M costs for this ICR are \$39 million, or an average of \$13 million per year. These are recordkeeping costs.

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

Because the information collection requirements were developed as an incidental part of standards development, no costs can be attributed to the development of the additional information collection requirements. Because reporting and recordkeeping requirements on the part of the respondents are required under sections 111 and 129 of the Act, no operational costs would be incurred by the Federal Government. Publication and distribution of the information are part of the AIRS Facility subsystem, with the result that no Federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents would occur incidentally as part of the periodic inspection of sources that is part of the Designated Administrator's overall compliance and enforcement program and, therefore, could not be attributable to the ICR. The only costs that the Implementing Agency would incur in the first three years are: reading and understanding the rule and the preparing of an annual report summarizing progress in implementing State plans and the compliance status of all the affected facilities. However, to be conservative in our estimate, we have estimated the burden as if the costs to the Implementing Agency for initial and ongoing compliance activities are also accounted for.

The average annual Agency cost during the three years of the ICR is estimated to be \$285,000.

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

Managerial	\$62.27 (GS-13, Step 5, \$38.92+ 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88+ 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2010 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for

overhead and fringe benefit costs. Details on the line item estimates used to calculate these burdens are presented in Tables 4 through 7 of Attachment 3.

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

The total number of respondents is also referred to as the respondent universe. The respondent universe for this ICR is based on the EPA’s SSI database, accounting for expected closures upon promulgation of the proposed emission guidelines. Industry burden is calculated based on the number of units and facilities in each subcategory and the anticipated controls and monitoring that each unit will most likely utilize to comply with the proposed emissions guidelines.

Additional estimates regarding the respondent universe are included in the industry burden determination. The EPA estimates that 94 respondents (facilities) will read the rule in year 1 and will submit a control plan. We have also included the burden associated with initial monitoring in the year 1 estimates. In years 2 and 3, the 94 respondents incur the annual burden associated with the emission guidelines, such as annual testing and monitoring system operation and maintenance.

<b>Total Annual Responses</b>			
(A) Unit Type	(B) Number of Respondents (facilities)	(C) Total Number Responses for 3- year Period	(D) Average Annual Number of Responses
Fluidized Bed	31	875	292
Multiple Hearth	63	2509	836
Total	94	3391	1128

The number of average annual responses is 1130.

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

##### **(i) The Respondent Tally**

A breakdown for each of the collection, reporting, and recordkeeping activities required by the emission guidelines is presented in Tables 1 and 2 of Attachment 2. Tables 1.A, 1.B, and 1.C show the costs for Fluidized Bed units in years 1, 2, and 3. Table 1.D summarizes the costs for the three year period. Similarly, Tables 2.A, 2.B, 2.C, and 2.D show the costs for Multiple Hearth units. The estimate of total annual hours requested from the respondents was based on the assumptions outlined in section 6(d) of this ICR. The respondent burden is estimated for the first 3 years after adoption of these guidelines by totaling the hours per year for technical, managerial, and clerical staff at the plant. This total was then divided by 3 to arrive at the annualized burden (see Table 3). A similar approach was taken for estimating annual labor costs. For the first three years after the adoption of the emission guidelines, it is estimated that industry would expend 21,900 hours annually at a cost of \$1.24 million per year to meet the monitoring, recordkeeping,

and reporting requirements. The annual non-labor costs are estimated at \$13 million, which include the initial and annual costs associated with the monitoring system and initial and annual performance testing.

### **(ii) The Designated Administrator**

The bottom line Designated Administrator burden hours and costs, presented in Tables 4 through 7 of Attachment 3, were calculated by totaling the hours per year for technical, managerial, and clerical staff, and by totaling the cost column. Table 7 of Attachment 3 summarizes the annual agency burden for each of the first three years and calculates the average annual burden by dividing the three year total by three. The estimated average annual burden over the first 3 years for the Designated Administrator would be 6,000 hours at a cost of \$285,000 per year.

### **(iii) Variations in the annual bottom line**

The total respondent costs for years 1, 2, and 3 are \$14,800,000, \$14,000,000, and \$14,000,000, respectively. The corresponding total respondent hours over this period are 30,000, 18,000, and 18,000 (see Tables 1 through 3 of Attachment 2). Activities during this period include reading and understanding the rule and developing a control plan. We have also estimated the burden of the rule to occur within the first three years. These include initial and annual performance tests, operator training and qualification, setting and monitoring of operating parameter values, and reporting and recordkeeping for these activities. We realize, however, that some of these activities will not occur until years 4 or 5 for some sources. Therefore, the respondent burden for years 1 through 3 may be conservatively high.

During the first 3 years, the Designated Administrators will be reviewing the regulation, reviewing the control plans, observing initial stack tests, reviewing initial test reports, and preparing annual summary reports. In years 1, 2, and 3, the Designated Administrators will expend 12,000, 3,000, and 3,000 total hours in labor, respectively. The corresponding costs for each year are \$590,000, \$130,000, and \$130,000 (see Tables 4 through 7 of Attachment 3).

### **6(f) Reasons for change in burden**

This is the first submittal of this burden estimate; therefore, this section is not applicable.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to be 19 hours per response. Burden means total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements;

train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2009-0559. 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 docket center is (202) 566-1927. 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 Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2009-0559 in any correspondence.

## **PART B OF THE SUPPORTING STATEMENT**

This section is not applicable because statistical methods are not used in data collection associated with this regulation.

ATTACHMENT 1

SOURCE DATA AND INFORMATION REQUIREMENTS

Requirement	40 CFR 60 Subpart M
<b>RECORDKEEPING</b>	
5-year retention of records.	60.5230
Calendar date of each record.	60.5230(a)
Records of increments of progress. Includes copies of the final control plan and any additional notifications.	60.5230(b)
Records of site-specific information and incinerator operation procedures.	60.5230(c)(1)
Records of names of persons who have completed review of the site-specific information and incinerator operating procedures in 60.5230(c)(1).	60.5230(c)(2)
Records of names of persons who have completed the operator training requirements. Includes documentation of the training and the dates of the training.	60.5230(c)(2)
Records showing the periods when no qualified operators were accessible for more than 8 hours, but less than two weeks.	60.5230(c)(3)
Records showing the periods when no qualified operators were accessible for two weeks or more.	60.5230(c)(4)
Records of control device inspections.	60.5230(d)
Records of initial performance tests, annual performance tests, and any subsequent performance tests.	60.5230(e)
Records of all continuous monitoring data; includes continuous emissions monitors, continuous automated sampling systems, and continuous parameter monitors.	60.5230(f)
Records of other info for continuous monitoring systems.	60.5230(g)



ATTACHMENT 1

SOURCE DATA AND INFORMATION REQUIREMENTS

Requirement	40 CFR 60 Subpart M MMM
Records of days when a deviation from the operating limits have occurred. Includes a description of the deviation and a description of the corrective actions taken.	60.5230(h)
Equipment vendor specifications for the incinerator, emission controls, and monitoring equipment.	60.5230(i)
Records of calibration of any monitoring devices.	60.5230(j)
Records of monitoring plan and performance evaluations.	60.5230(k)
Records of less frequent testing.	60.5230(l)
Records of use of bypass stack.	60.5230(m)
<b>REPORTING</b>	
<p>Report your increments of progress no later than 10 business days after the compliance date for the increment:</p> <ul style="list-style-type: none"> <li>- final control plan including air pollution control device descriptions, process changes, type of waste to be burned, and the maximum design sewage sludge burning capacity</li> <li>- closure notification, if applicable</li> </ul>	60.5235(a)
<p>Report the following information no later than 60 days after the initial performance test:</p> <ul style="list-style-type: none"> <li>- complete test report for the initial performance test</li> <li>- results of CMS performance evaluation</li> <li>- the values for site-specific operating limits</li> <li>- documentation of installation of bag leak detection system for fabric filter</li> <li>- results of air pollution control device inspection</li> </ul>	60.5235(b)

ATTACHMENT 1

SOURCE DATA AND INFORMATION REQUIREMENTS

Requirement	40 CFR 60 Subpart M
<p>Report the following information annually:</p> <ul style="list-style-type: none"> <li>- date of report and beginning and ending dates of reporting period</li> <li>- if a performance test was conducted during the reporting period, the results of the test</li> <li>- highest recorded 3-hour average and the lowest 3-hour average, as applicable, for each pollutant and operating parameter recorded using a CMS</li> <li>- if no deviations occurred, a statement of no deviation</li> <li>- if a fabric filter is used, the date, time, and duration of alarms</li> <li>- if a performance test was not conducted during the reporting period, a statement that the requirements of §60.5205(a)(3) were met</li> <li>- if a performance evaluation of a CMS was conducted, the results</li> <li>- documentation of periods when all qualified SSI unit operators were unavailable for more than 8 hours but less than 2 weeks</li> <li>- annual control device inspection results</li> <li>- information on if continuous monitoring systems malfunctioned or were out of control</li> <li>- if there were no operator training deviations, a statement that there were no such deviations</li> </ul>	<p>60.5235(c)</p>

ATTACHMENT 1

SOURCE DATA AND INFORMATION REQUIREMENTS

Requirement	40 CFR 60 Subpart M MMM
<p>If a deviation from operating limits or emission limits occurs, submit a deviation report that includes the following information:</p> <ul style="list-style-type: none"> <li>- date and times of deviation</li> <li>- averaged and recorded data for those dates</li> <li>- duration and causes of each deviation and the corrective actions taken</li> <li>- copy of operating parameter monitoring data and any test reports</li> <li>- dates, times, and causes for monitor downtime incidents</li> <li>- if CMS malfunctions or is out of control, including the information specified in §60.5235(e)(3)(viii)</li> </ul>	60.5235(d)
<p>If all qualified operators are unavailable for more than 2 weeks, submit a notification of the deviation within 10 days and a corrective action summary every 4 weeks</p>	60.5235(e)
<p>Report the following information if a force majeure occurs:</p> <ul style="list-style-type: none"> <li>- description of the force majeure event</li> <li>- rationale for attributing the delay to the force majeure</li> <li>- description of measures taken to minimize the delay</li> <li>- identification of date by which you propose to conduct the performance test</li> </ul>	60.5235(f)
<p>Submit a notification 1 month prior if you intend to start or stop use of a CMS</p>	60.5235(g)
<p>Submit a notification 30 days prior if you intend to conduct a performance test</p>	60.5235(g)
<p>Submit a notification at least 7 days in advance if you intend to reschedule a performance test</p>	60.5235(g)

## **ATTACHMENT 2**

### **TABLES 1, 2, and 3**

Tables 1.A – 1.D: Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emission Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMMM, Fluidized Bed

Tables 2.A – 2.D: Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emission Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMMM, Multiple Hearth

Table 3: Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMMM - All Subcategories

## **ATTACHMENT 3**

### **TABLES 4, 5, 6, and 7**

- Table 4: Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the Emission Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart M MMM - Year 1
- Table 5: Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the Emission Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart M MMM - Year 2
- Table 6: Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the Emission Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart M MMM - Year 3
- Table 7: Summary of Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the Emission Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units – Subpart M MMM

**Table 1.A - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines  
for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMM - Year 1, Fluidized Bed**

Burden Item	(A)	Emission	Non-Labor Costs Per Occurrence	(B)	(C)	(D)	(E)	(F)	(G)	(H)	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes	
	Respondent Hours per Occurrence (Technical hours)	Testing Contractor Hours Per Occurrence		Number of Occurrences Per Respondent Per Year	Hours Per Respondent Per Year (C=A x B)	Number of Respondents Per Year	Technical Hours Per Year (CXD)	Management Hours Per Year (E x 0.05)	Clerical Hours Per Year (E x 0.1)	Emission Testing Contractor Hours Per Year					
1. Applications	N/A														
2. Surveys and Studies	N/A														
3. Reporting Requirements															
A. Read and Understand Rule Requirements	1	0	\$100	1	1	31	31	2	3	0	\$2,027	\$3,100	0	a,b,i,j	
B. Required Activities															
1) Initial stack test and report	Incl. in E.	varies	\$71,000	1	0	46	0	0	0	40,825	\$0	\$3,266,000	46	a	
2) Annual stack test and test report	Incl. in E.	767	\$61,350	1	0	0	0	0	0	0	\$0	\$0	0	c	
3) Operator training and qualification															
a) Establish and teach operator qualification course	64	0	\$0	1	64	31	1,984	99	198	0	\$129,710	\$0	31	a,b,j	
b) Obtain operator qualification	72	0	\$0	1	72	31	2,232	112	223	0	\$145,924	\$0	31	a,b,j	
c) Annual refresher course	12	0	\$0	1	12	0	0	0	0	0	\$0	\$0	0	c	
d) Initial review of site-specific information	Incl. in a.	0													
e) Annual review of site-specific information	8	0	\$0	1	8	0	0	0	0	0	\$0	\$0	0	c	
4) Establish operating parameters (maximum and minimum)	40	Incl. in B.1	\$0	1	40	46	1,840	92	184	0	\$120,296	\$0	46	a	
5) Continuous parameter monitoring (including CEMS)															
a) Initial capital costs	0	0	\$20,935	1	0	46	0	0	0	0	\$0	\$963,000	0	a,d	
b) Annualized capital and O&M costs	11	0	\$12,680	1	11	46	506	25	51	0	\$33,081	\$583,300	46	c,e	
C. Create Information	Incl. in 3.B														
D. Gather Information	Incl. in 3.E														
E. Report Preparation															
1) Notification of initial performance test															
5) Continuous parameter monitoring (including CEMS)	2	0	\$0	1	2	46	92	5	9	0	\$6,015	\$0	46		
b) Fugitive Ash Emissions	1	0	\$0	1	1	46	46	2	5	0	\$3,007	\$0	46		
2) Notification of initial CMS Demonstration	2	0	\$0	1	2	31	62	3	6	0	\$4,053	\$0	31	b,j	
3) Report of initial performance test															
a) Pollutants, opacity	8	0	\$7.50	1	8	46	368	18	37	0	\$24,059	\$345	46		
b) Fugitive Ash Emissions	2	0	\$0	1	2	46	92	5	9	0	\$6,015	\$0	46		
4) Report of initial CMS demonstration	Incl. in 3.B.5														
5) Report for site-specific parameter petition	14	0	\$0	1	14	0	0	0	0	0	\$0	\$0	0	a,f	
6) Report of initial stack test	Incl. in 3.B.1														
7) Annual Report:															
a) Results of performance tests conducted during the year	40	0	\$7.50	1	40	0	0	0	0	0	\$0	\$0	0		
8) Status report for operators that are off-site for more than 2 weeks	8	0	\$0	1	8	4	32	2	3	0	\$2,092	\$0	4	g	
9) Corrective action summary for operators that are off-site for more than 2 weeks	8	0	\$0	2	16	4	64	3	6	0	\$4,184	\$0	8	g	
10) Semiannual report of emissions/parameter exceedances	24	0	\$7.50	2	48	4	192	10	19	0	\$12,553	\$60	8	h	
<i>ReportingSubtotal</i>							7,541	377	754	40,825	\$493,016	\$3,852,805	435		

**Table 1.A - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMM - Year 1, Fluidized Bed**

Burden Item	(A)	Emission	Non-Labor Costs Per Occurrence	(B)	(C)	(D)	(E)	(F)	(G)	(H)	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes															
	Respondent Hours per Occurrence (Technical hours)	Testing Contractor Hours Per Occurrence		Number of Occurrences Per Respondent Per Year	Hours Per Respondent (C=A x B)	Number of Respondents Per Year	Technical Hours Per Year (CXD)	Management Hours Per Year (E x 0.05)	Clerical Hours Per Year (E x 0.1)	Emission Testing Contractor Hours Per Year																			
4. Recordkeeping Requirements																													
A. Read Instructions	Incl. in 3.A																												
B. Plan Activities	N/A																												
C. Implement Activities	N/A																												
D. Develop Record System	N/A																												
E. Record Information																													
1) Records of operating parameters	Incl. in 3.B.5	0	\$0	52	0	0	0	0	0	0	\$0	\$0	0																
2) Records of exceedances of the operating parameters	1.5	0	\$0	1	1.5	4	6	0	1	0	\$392	\$0	0	g															
3) Records of stack tests	Incl. in 3.E																												
4) Records of persons who have reviewed operating procedures	1	0	\$0	1	1	0	0	0	0	0	\$0	\$0	0																
5) Records of persons who have completed operator training	1	0	\$0	1	1	0	0	0	0	0	\$0	\$0	0																
6) Records of persons who meet operator qualification criteria	1	0	\$0	1	1	0	0	0	0	0	\$0	\$0	0																
7) Records of monitoring device calibration	Incl. in 3.B																												
8) Records of site-specific documentation	24	0	\$0	1	24	0	0	0	0	0	\$0	\$0	0																
F. Personnel Training	Incl. in 3.B																												
G. Time for Audits	N/A																												
<i>Recordkeeping Subtotal</i>							6	0.3	0.6	0	\$392	\$0	0																
<b>TOTAL:</b>							<b>7,547</b>	<b>377</b>	<b>755</b>	<b>40,825</b>	<b>\$493,408</b>	<b>\$3,852,805</b>	<b>435</b>																
											<table border="0"> <tr> <td></td> <td align="right">Total Hours</td> <td align="right">Labor</td> <td align="right">Non-Labor</td> <td align="right">Total</td> </tr> <tr> <td align="right" colspan="4">Summary of Respondent Burden</td> <td align="right">\$4,346,213</td> </tr> <tr> <td align="right" colspan="3">Initial Capital and Startup</td> <td align="right">\$966,100</td> </tr> <tr> <td align="right" colspan="3">Annualized Capital/Start-up and O &amp; M</td> <td align="right">\$3,852,805</td> </tr> </table>		Total Hours	Labor	Non-Labor	Total	Summary of Respondent Burden				\$4,346,213	Initial Capital and Startup			\$966,100	Annualized Capital/Start-up and O & M			\$3,852,805
	Total Hours	Labor	Non-Labor	Total																									
Summary of Respondent Burden				\$4,346,213																									
Initial Capital and Startup			\$966,100																										
Annualized Capital/Start-up and O & M			\$3,852,805																										

FOOTNOTES

- a One-time only costs.
- b Cost incurred by a facility regardless of the number of affected units at the plant.
- c Annual cost. Annual costs are not incurred until the second year of operation.
- d Based on the sum of the total capital costs for each monitoring system required for incinerators.
- e Based on the sum of the annualized capital costs for each monitoring system required for incinerators.
- f Assumed that none of the facilities will petition for site-specific parameters.
- g Assumed that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year. Assumed that this required only two corrective action summaries.
- h Assumed that 10 percent of the facilities would have an exceedance during the year.
- i Assumed \$100 for purchase of filing cabinet to house copy of rule, records and report copies.

**Table 1.B - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines  
for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMM - Year 2, Fluidized Bed**

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	(E) Technical Hours Per Year (CXD)	(F) Management Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	(H) Emission Testing Contractor Hours Per Year	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes
1. Applications	N/A													
2. Surveys and Studies	N/A													
3. Reporting Requirements														
A. Read and Understand Rule Requirements	1	0	\$0	1	1	0	0	0	0	0	\$0	\$0	0	a,b,i
B. Required Activities														
1) Initial stack test and report	Incl. in E.	varies	\$0	1	0	0	0	0	0	0	\$0	\$0	0	a
2) Annual stack test and test report	Incl. in E.	767	\$61,350	1	0	46	0	0	0	35,276	\$0	\$2,822,100	46	c
3) Operator training and qualification														
a) Establish and teach operator qualification course	64	0	\$0	1	64	0	0	0	0	0	\$0	\$0	0	a,b
b) Obtain operator qualification	72	0	\$0	1	72	0	0	0	0	0	\$0	\$0	0	a,b
c) Annual refresher course	12		\$0	1	12	31	372	19	37	0	\$24,321	\$0	31	c,j
d) Initial review of site-specific information	Incl. in a.													
e) Annual review of site-specific information	8	0	\$0	1	8	31	248	12	25	0	\$16,214	\$0	31	c,j
4) Establish operating parameters (maximum and minimum)	40	Incl. in B.1	\$0	1	40	0	0	0	0	0	\$0	\$0	0	a
5) Continuous parameter monitoring (including CEMS)														
a) Initial capital costs	0	0	\$0	1	0	0	0	0	0	0	\$0	\$0	0	a,d
b) Annualized capital and O&M costs	11	0	\$12,680	1	11	46	506	25	51	0	\$33,081	\$583,300	46	c,e
C. Create Information	Incl. in 3.B													
D. Gather Information	Incl. in 3.E													
E. Report Preparation														
1) Notification of initial performance test														
5) Continuous parameter monitoring (including CEMS)	2	0	\$0	1	2	0	0	0	0	0	\$0	\$0	0	
b) Fugitive Ash Emissions	1	0	\$0	1	1	0	0	0	0	0	\$0	\$0	0	
2) Notification of initial CMS Demonstration	2	0	\$0	1	2	0	0	0	0	0	\$0	\$0	0	b
3) Report of initial performance test														
a) Pollutants, opacity	8	0	\$7.50	1	8	0	0	0	0	0	\$0	\$0	0	
b) Fugitive Ash Emissions	2	0	\$0	1	2	0	0	0	0	0	\$0	\$0	0	
4) Report of initial CMS demonstration	Incl. in 3.B.5													
5) Report for site-specific parameter petition	14	0	\$0	1	14	0	0	0	0	0	\$0	\$0	0	a,f
6) Report of initial stack test	Incl. in 3.B.1													
7) Annual Report:														
a) Results of performance tests conducted during the year	40	0	\$7.50	1	40	46	1,840	92	184	0	\$120,296	\$345	46	
8) Status report for operators that are off-site for more than 2 weeks	8	0	\$0	1	8	4	32	2	3	0	\$2,092	\$0	4	g
9) Corrective action summary for operators that are off-site for more than 2 weeks	8	0	\$0	2	16	4	64	3	6	0	\$4,184	\$0	8	g
10) Semiannual report of emissions/parameter exceedances	24	0	\$7.50	2	48	4	192	10	19	0	\$12,553	\$60	8	h
ReportingSubtotal							3,254	163	325	35,276	\$212,740	\$3,405,805	220	



**Table 1.B - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines  
for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMM - Year 2, Fluidized Bed**

Burden Item	(A)	Emission	Non-Labor	(B)	(C)	(D)	(E)	(F)	(G)	(H)	Total	Total	Total	Footnotes		
	Respondent Hours per Occurrence (Technical hours)	Testing Contractor Hours Per Occurrence	Costs Per Occurrence	Number of Occurrences Per Respondent Per Year	Hours Per Respondent Per Year (C=A x B)	Number of Respondents Per Year	Technical Hours Per Year (CXD)	Management Hours Per Year (E x 0.05)	Clerical Hours Per Year (E x 0.1)	Emission Testing Contractor Hours Per Year	Labor Costs Per Year	Non-Labor Costs Per Year	Responses Per Year			
<b>4. Recordkeeping Requirements</b>																
A. Read Instructions	Incl. in 3.A															
B. Plan Activities	N/A															
C. Implement Activities	N/A															
D. Develop Record System	N/A															
E. Record Information																
1) Records of operating parameters	Incl. in 3.B.5	0	\$0	52	0	0	0	0	0	0	\$0	\$0	0			
2) Records of exceedances of the operating parameters	1.5	0	\$0	1	1.5	4	6	0	1	0	\$392	\$0	0	g		
3) Records of stack tests	Incl. in 3.E															
4) Records of persons who have reviewed operating procedures	1	0	\$0	1	1	31	31	2	3	0	\$2,027	\$0	0	j		
5) Records of persons who have completed operator training	1	0	\$0	1	1	31	31	2	3	0	\$2,027	\$0	0	j		
6) Records of persons who meet operator qualification criteria	1	0	\$0	1	1	31	31	2	3	0	\$2,027	\$0	0	j		
7) Records of monitoring device calibration	Incl. in 3.B															
8) Records of site-specific documentation	24	0	\$0	1	24	31	744	37	74	0	\$48,641	\$0	0	j		
F. Personnel Training	Incl. in 3.B															
G. Time for Audits	N/A															
<b>Recordkeeping Subtotal</b>							843	42.15	84.3	0	\$55,114	\$0	0			
<b>TOTAL:</b>							4,097	205	410	35,276	\$267,854	\$3,405,805	220			
											Total Hours	Labor	Non-Labor	Total		
								Summary of Respondent Burden		4,712	\$267,854	\$3,405,805	\$3,673,659			
											Initial Capital and Startup		\$0			
											Annualized Capital/Start-up and O & M		\$3,405,805			

FOOTNOTES

- a One-time only costs.
- b Cost incurred by a facility regardless of the number of affected units at the plant.
- c Annual cost. Annual costs are not incurred until the second year of operation.
- d Based on the sum of the total capital costs for each monitoring system required for incinerators.
- e Based on the sum of the annualized capital costs for each monitoring system required for incinerators.
- f Assumed that none of the facilities will petition for site-specific parameters.
- g Assumed that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year. Assumed that this required only two corrective action summaries.
- h Assumed that 10 percent of the facilities would have an exceedance during the year.
- i Assumed \$100 for purchase of filing cabinet to house copy of rule, records and report copies.
- j 32 facilities have FB units; however one of these facilities also has a MH unit. Facility-specific costs are included for only 31 units here and the facility-specific costs for the facility have both unit types are incorporated into the MH tables.

**Table 1.C - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines  
for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMM - Year 3, Fluidized Bed**

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	(E) Technical Hours Per Year (CXD)	(F) Management Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	(H) Emission Testing Contractor Hours Per Year	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes
1. Applications	N/A													
2. Surveys and Studies	N/A													
3. Reporting Requirements														
A. Read and Understand Rule Requirements	1	0	\$0	1	1	0	0	0	0	0	\$0	\$0	0	a,b,i
B. Required Activities														
1) Initial stack test and report	Incl. in E.	varies	\$0	1	0	0	0	0	0	0	\$0	\$0	0	a
2) Annual stack test and test report	Incl. in E.	767	\$61,350	1	0	46	0	0	0	35,276	\$0	\$2,822,100	46	c
3) Operator training and qualification														
a) Establish and teach operator qualification course	64	0	\$0	1	64	0	0	0	0	0	\$0	\$0	0	a,b
b) Obtain operator qualification	72	0	\$0	1	72	0	0	0	0	0	\$0	\$0	0	a,b
c) Annual refresher course	12	0	\$0	1	12	31	372	19	37	0	\$24,321	\$0	31	c,j
d) Initial review of site-specific information	Incl. in a.													
e) Annual review of site-specific information	8	0	\$0	1	8	31	248	12	25	0	\$16,214	\$0	31	c,j
4) Establish operating parameters (maximum and minimum)	40	Incl. in B.1	\$0	1	40	0	0	0	0	0	\$0	\$0	0	a
5) Continuous parameter monitoring (including CEMS)														
a) Initial capital costs	0	0	\$0	1	0	0	0	0	0	0	\$0	\$0	0	a,d
b) Annualized capital and O&M costs	11	0	\$12,680	1	11	46	506	25	51	0	\$33,081	\$583,300	46	c,e
C. Create Information	Incl. in 3.B													
D. Gather Information	Incl. in 3.E													
E. Report Preparation														
1) Notification of initial performance test														
5) Continuous parameter monitoring (including CEMS)	2	0	\$0	1	2	0	0	0	0	0	\$0	\$0	0	
b) Fugitive Ash Emissions	1	0	\$0	1	1	0	0	0	0	0	\$0	\$0	0	
2) Notification of initial CMS Demonstration	2	0	\$0	1	2	0	0	0	0	0	\$0	\$0	0	b
3) Report of initial performance test														
a) Pollutants, opacity	8	0	\$7.50	1	8	0	0	0	0	0	\$0	\$0	0	
b) Fugitive Ash Emissions	2	0	\$0	1	2	0	0	0	0	0	\$0	\$0	0	
4) Report of initial CMS demonstration	Incl. in 3.B.5													
5) Report for site-specific parameter petition	14	0	\$0	1	14	0	0	0	0	0	\$0	\$0	0	a,f
6) Report of initial stack test	Incl. in 3.B.1													
7) Annual Report:														
a) Results of performance tests conducted during the year	40	0	\$7.50	1	40	46	1,840	92	184	0	\$120,296	\$345	46	
8) Status report for operators that are off-site for more than 2 weeks	8	0	\$0	1	8	4	32	2	3	0	\$2,092	\$0	4	g
9) Corrective action summary for operators that are off-site for more than 2 weeks	8	0	\$0	2	16	4	64	3	6	0	\$4,184	\$0	8	g
10) Semiannual report of emissions/parameter exceedances	24	0	\$7.50	2	48	4	192	10	19	0	\$12,553	\$60	8	h
<i>Reporting Subtotal</i>							3,254	163	325	35,276	\$212,740	\$3,405,805	220	

**Table 1.C - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines  
for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMM - Year 3, Fluidized Bed**

Burden Item	(A)	Emission	Non-Labor	(B)	(C)	(D)	(E)	(F)	(G)	(H)	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes					
	Respondent Hours per Occurrence (Technical hours)	Testing Contractor Hours Per Occurrence	Costs Per Occurrence	Number of Occurrences Per Respondent Per Year	Hours Per Respondent Per Year (C=A x B)	Number of Respondents Per Year	Technical Hours Per Year (CXD)	Management Hours Per Year (E x 0.05)	Clerical Hours Per Year (E x 0.1)	Emission Testing Contractor Hours Per Year									
4. Recordkeeping Requirements																			
A. Read Instructions	Incl. in 3.A																		
B. Plan Activities	N/A																		
C. Implement Activities	N/A																		
D. Develop Record System	N/A																		
E. Record Information																			
1) Records of operating parameters	Incl. in 3.B.5	0	\$0	52	0	0	0	0	0	0	\$0	\$0	0						
2) Records of exceedances of the operating parameters	1.5	0	\$0	1	1.5	4	6	0	1	0	\$392	\$0	0	g					
3) Records of stack tests	Incl. in 3.E																		
4) Records of persons who have reviewed operating procedures	1	0	\$0	1	1	31	31	2	3	0	\$2,027	\$0	0	j					
5) Records of persons who have completed operator training	1	0	\$0	1	1	31	31	2	3	0	\$2,027	\$0	0	j					
6) Records of persons who meet operator qualification criteria	1	0	\$0	1	1	31	31	2	3	0	\$2,027	\$0	0	j					
7) Records of monitoring device calibration	Incl. in 3.B																		
8) Records of site-specific documentation	24	0	\$0	1	24	31	744	37	74	0	\$48,641	\$0	0	j					
F. Personnel Training	Incl. in 3.B																		
G. Time for Audits	N/A																		
Recordkeeping Subtotal							843	42.15	84.3	0	\$55,114	\$0	0						
TOTAL:							4,097	205	410	35,276	\$267,854	\$3,405,805	220						
											Total Hours	Labor	Non-Labor	Total					
											Summary of Respondent Burden				4,712	\$267,854	\$3,405,805	\$3,673,659	
											Initial Capital and Startup					\$0			
											Annualized Capital/Start-up and O & M						\$3,405,805		

FOOTNOTES

- a One-time only costs.
- b Cost incurred by a facility regardless of the number of affected units at the plant.
- c Annual cost. Annual costs are not incurred until the second year of operation.
- d Based on the sum of the total capital costs for each monitoring system required for incinerators.
- e Based on the sum of the annualized capital costs for each monitoring system required for incinerators.
- f Assumed that none of the facilities will petition for site-specific parameters.
- g Assumed that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year. Assumed that this required only two corrective action summaries.
- h Assumed that 10 percent of the facilities would have an exceedance during the year.
- i Assumed \$100 for purchase of filing cabinet to house copy of rule, records and report copies.
- j 32 facilities have FB units; however one of these facilities also has a MH unit. Facility-specific costs are included for only 31 units here and the facility-specific costs for the facility have both unit types are incorporated into the MH tables.

**Table 1.D - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMMM - Fluidized Bed**

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Testing Contractor Hours <sup>a</sup>	Labor Costs	Non-Labor (Annualized Capital/Startup and O&M) Costs	Total Costs
1	7,547	377	755	8,679	40,825	\$493,408	\$3,852,805	\$4,346,213
2	4,097	205	410	4,712	35,276	\$267,854	\$3,405,805	\$3,673,659
3	4,097	205	410	4,712	35,276	\$267,854	\$3,405,805	\$3,673,659
Total	15,741	787	1,574	18,102	111,378	\$1,029,116	\$10,664,415	\$11,693,531
Average	5,247	262	525	6,034	37,126	\$343,039	\$3,554,805	\$3,897,844

**Table 2.A - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMM - Year 1, Multiple Hearth**

Burden Item	(A) Respondent Hours per Occurrence (Technical hours)	(H) Emission Testing Contractor Hours Per Occurrence	(C) 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	(E) Technical Hours Per Year (CXD)	(F) Management Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	(H) Emission Testing Contractor Hours Per Year	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes
1. Applications	N/A													
2. Surveys and Studies	N/A													
3. Reporting Requirements														
A. Read and Understand Rule Requirements	1	0	\$100	1	1	63	63	3	6	0	\$4,119	\$6,300	0	a,b,i
B. Required Activities														
1) Initial stack test and report	Incl. in E.	varies	\$58,785	1	0	151	0	0	0	110,956	\$0	\$8,876,500	151	a
2) Annual stack test and test report	Incl. in E.	767	\$61,350	1	0	0	0	0	0	0	\$0	\$0	0	c
3) Operator training and qualification														
a) Establish and teach operator qualification course	64	0	\$0	1	64	63	4,032	202	403	0	\$263,604	\$0	63	a,b
b) Obtain operator qualification	72	0	\$0	1	72	63	4,536	227	454	0	\$296,555	\$0	63	a,b
c) Annual refresher course	12	0	\$0	1	12	0	0	0	0	0	\$0	\$0	0	c
d) Initial review of site-specific information	Incl. in a.													
e) Annual review of site-specific information	8	0	\$0	1	8	0	0	0	0	0	\$0	\$0	0	c
4) Establish operating parameters (maximum and minimum)	40	Incl. in B.1	\$0	1	40	151	6,040	302	604	0	\$394,883	\$0	151	a
5) Continuous parameter monitoring (including CEMS)														
a) Initial capital costs	0	0	\$5,662	1	0	151	0	0	0	0	\$0	\$855,000	151	a,d
b) Annualized capital and O&M costs	11	0	\$1,974	1	11	151	1,661	83	166	0	\$108,593	\$298,000	0	c,e
C. Create Information	Incl. in 3.B													
D. Gather Information	Incl. in 3.E													
E. Report Preparation														
1) Notification of initial performance test														
5) Continuous parameter monitoring (including CEMS)	2	0	\$0	1	2	151	302	15	30	0	\$19,744	\$0	151	
b) Fugitive Ash Emissions	1	0	\$0	1	1	151	151	8	15	0	\$9,872	\$0	151	
2) Notification of initial CMS Demonstration	2	0	\$0	1	2	63	126	6	13	0	\$8,238	\$0	63	b
3) Report of initial performance test														
a) Pollutants, opacity	8	0	\$7.50	1	8	151	1,208	60	121	0	\$78,977	\$1,133	151	
b) Fugitive Ash Emissions	2	0	\$0	1	2	151	302	15	30	0	\$19,744	\$0	151	
4) Report of initial CMS demonstration	Incl. in 3.B.5													
5) Report for site-specific parameter petition	14	0	\$0	1	14	0	0	0	0	0	\$0	\$0	0	a,f
6) Report of initial stack test	Incl. in 3.B.1													
7) Annual Report:														
a) Results of performance tests conducted during the year	40	0	\$7.50	1	40	0	0	0	0	0	\$0	\$0	0	
8) Status report for operators that are off-site for more than 2 weeks	8	0	\$0	1	8	7	56	3	6	0	\$3,661	\$0	7	g
9) Corrective action summary for operators that are off-site for more than 2 weeks	8	0	\$0	2	16	7	112	6	11	0	\$7,322	\$0	14	g
10) Semiannual report of emissions/parameter exceedances	24	0	\$7.50	2	48	7	336	17	34	0	\$21,967	\$105	14	h
ReportingSubtotal							18,925	946	1,893	110,956	\$1,237,280	\$9,182,038	1,281	

**Table 2.A - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMM - Year 1, Multiple Hearth**

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	(E) Technical Hours Per Year (CXD)	(F) Management Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	(H) Emission Testing Contractor Hours Per Year	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes	
4. Recordkeeping Requirements															
A. Read Instructions	Incl. in 3.A														
B. Plan Activities	N/A														
C. Implement Activities	N/A														
D. Develop Record System	N/A														
E. Record Information															
1) Records of operating parameters	Incl. in 3.B.5	0	\$0	52	0	0	0	0	0	0	\$0	\$0	0		
2) Records of exceedances of the operating parameters	1.5	0	\$0	1	1.5	7	11	1	1	0	\$686	\$0	0	g	
3) Records of stack tests	Incl. in 3.E														
4) Records of persons who have reviewed operating procedures	1	0	\$0	1	1	0	0	0	0	0	\$0	\$0	0		
5) Records of persons who have completed operator training	1	0	\$0	1	1	0	0	0	0	0	\$0	\$0	0		
6) Records of persons who meet operator qualification criteria	1	0	\$0	1	1	0	0	0	0	0	\$0	\$0	0		
7) Records of monitoring device calibration	Incl. in 3.B														
8) Records of site-specific documentation	24	0	\$0	1	24	0	0	0	0	0	\$0	\$0	0		
F. Personnel Training	Incl. in 3.B														
G. Time for Audits	N/A														
Recordkeeping Subtotal							10.5	0.525	1.05	0	\$686	\$0	0		
TOTAL:							18,936	947	1,894	110,956	\$1,237,966	\$9,182,038	1,281		
							Total Hours	Labor	Non-Labor	Total					
							Summary of Respondent Burden	21,776	\$1,237,966	\$9,182,038	\$10,420,004				
							Initial Capital and Startup			\$861,300					
							Annualized Capital/Start-up and O			\$9,182,038					

FOOTNOTES

- a One-time only costs.
- b Cost incurred by a facility regardless of the number of affected units at the plant.
- c Annual cost. Annual costs are not incurred until the second year of operation.
- d Based on the sum of the total capital costs for each monitoring system required for incinerators.
- e Based on the sum of the annualized capital costs for each monitoring system required for incinerators.
- f Assumed that none of the facilities will petition for site-specific parameters.
- g Assumed that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year. Assumed that this required only two corrective action summaries.
- h Assumed that 10 percent of the facilities would have an exceedance during the year.
- i Assumed \$100 for purchase of filing cabinet to house copy of rule, records and report copies.

**Table 2.B - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines  
for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMM - Year 2, Multiple Hearth**

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	(E) Technical Hours Per Year (CXD)	(F) Management Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	(H) Emission Testing Contractor Hours Per Year	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes
1. Applications	N/A													
2. Surveys and Studies	N/A													
3. Reporting Requirements														
A. Read and Understand Rule Requirements	1	0	\$0	1	1	0	0	0	0	0	\$0	\$0	0	a,b,i
B. Required Activities														
1) Initial stack test and report	Incl. in E.	varies	\$0	1	0	0	0	0	0	0	\$0	\$0	0	a
2) Annual stack test and test report	Incl. in E.	767	\$61,350	1	0	151	0	0	0	115,798	\$0	\$9,263,850	151	c
3) Operator training and qualification														
a) Establish and teach operator qualification course	64	0	\$0	1	64	0	0	0	0	0	\$0	\$0	0	a,b
b) Obtain operator qualification	72	0	\$0	1	72	0	0	0	0	0	\$0	\$0	0	a,b
c) Annual refresher course	12		\$0	1	12	63	756	38	76	0	\$49,426	\$0	63	c
d) Initial review of site-specific information	Incl. in a.													
e) Annual review of site-specific information	8	0	\$0	1	8	63	504	25	50	0	\$32,951	\$0	63	c
4) Establish operating parameters (maximum and minimum)	40	Incl. in B.1	\$0	1	40	0	0	0	0	0	\$0	\$0	0	a
5) Continuous parameter monitoring (including CEMS)														
a) Initial capital costs	0	0	\$0	1	0	0	0	0	0	0	\$0	\$0	0	a,d
b) Annualized capital and O&M costs	11	0	\$1,974	1	11	151	1,661	83	166	0	\$108,593	\$298,000	151	c,e
C. Create Information	Incl. in 3.B													
D. Gather Information	Incl. in 3.E													
E. Report Preparation														
1) Notification of initial performance test														
5) Continuous parameter monitoring (including CEMS)	2	0	\$0	1	2	0	0	0	0	0	\$0	\$0	0	
b) Fugitive Ash Emissions	1	0	\$0	1	1	0	0	0	0	0	\$0	\$0	0	
2) Notification of initial CMS Demonstration	2	0	\$0	1	2	0	0	0	0	0	\$0	\$0	0	b
3) Report of initial performance test														
a) Pollutants, opacity	8	0	\$7.50	1	8	0	0	0	0	0	\$0	\$0	0	
b) Fugitive Ash Emissions	2	0	\$0	1	2	0	0	0	0	0	\$0	\$0	0	
4) Report of initial CMS demonstration	Incl. in 3.B.5													
5) Report for site-specific parameter petition	14	0	\$0	1	14	0	0	0	0	0	\$0	\$0	0	a,f
6) Report of initial stack test	Incl. in 3.B.1													
7) Annual Report:														
a) Results of performance tests conducted during the year	40	0	\$7.50	1	40	151	6,040	302	604	0	\$394,883	\$1,133	151	
8) Status report for operators that are off-site for more than 2 weeks	8	0	\$0	1	8	7	56	3	6	0	\$3,661	\$0	7	g
9) Corrective action summary for operators that are off-site for more than 2 weeks	8	0	\$0	2	16	7	112	6	11	0	\$7,322	\$0	14	g
10) Semiannual report of emissions/parameter exceedances	24	0	\$7.50	2	48	7	336	17	34	0	\$21,967	\$105	14	h
ReportingSubtotal							9,465	473	947	115,798	\$618,803	\$9,563,088	614	

**Table 2.B - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines  
for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMM - Year 2, Multiple Hearth**

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	(E) Technical Hours Per Year (CXD)	(F) Management Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	(H) Emission Testing Contractor Hours Per Year	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes	
<b>4. Recordkeeping Requirements</b>															
A. Read Instructions	Incl. in 3.A														
B. Plan Activities	N/A														
C. Implement Activities	N/A														
D. Develop Record System	N/A														
E. Record Information															
1) Records of operating parameters	Incl. in 3.B.5	0	\$0	52	0	0	0	0	0	0	\$0	\$0	0		
2) Records of exceedances of the operating parameters	1.5	0	\$0	1	1.5	7	11	1	1	0	\$686	\$0	0	g	
3) Records of stack tests	Incl. in 3.E														
4) Records of persons who have reviewed operating procedures	1	0	\$0	1	1	63	63	3	6	0	\$4,119	\$0	0		
5) Records of persons who have completed operator training	1	0	\$0	1	1	63	63	3	6	0	\$4,119	\$0	0		
6) Records of persons who meet operator qualification criteria	1	0	\$0	1	1	63	63	3	6	0	\$4,119	\$0	0		
7) Records of monitoring device calibration	Incl. in 3.B														
8) Records of site-specific documentation	24	0	\$0	1	24	63	1,512	76	151	0	\$98,852	\$0	0		
F. Personnel Training	Incl. in 3.B														
G. Time for Audits	N/A														
<b>Recordkeeping Subtotal</b>							1711.5	85.575	171.15	0	\$111,895	\$0	0		
<b>TOTAL:</b>							11,177	559	1,118	115,798	\$730,698	\$9,563,088	614		
											Total Hours	Labor	Non-Labor	Total	
							Summary of Respondent Burden	12,853	\$730,698	\$9,563,088	\$10,293,785				
							Initial Capital and Startup					\$0			
							Annualized Capital/Start-up and O					\$9,563,088			

FOOTNOTES

- a One-time only costs.
- b Cost incurred by a facility regardless of the number of affected units at the plant.
- c Annual cost. Annual costs are not incurred until the second year of operation.
- d Based on the sum of the total capital costs for each monitoring system required for incinerators.
- e Based on the sum of the annualized capital costs for each monitoring system required for incinerators.
- f Assumed that none of the facilities will petition for site-specific parameters.
- g Assumed that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year. Assumed that this required only two corrective action summaries.
- h Assumed that 10 percent of the facilities would have an exceedance during the year.
- i Assumed \$100 for purchase of filing cabinet to house copy of rule, records and report copies.



**Table 2.C - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines  
for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMM - Year 3, Multiple Hearth**

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	(E) Technical Hours Per Year (CXD)	(F) Management Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	(H) Emission Testing Contractor Hours Per Year	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes
1. Applications	N/A													
2. Surveys and Studies	N/A													
3. Reporting Requirements														
A. Read and Understand Rule Requirements	1	0	\$0	1	1	0	0	0	0	0	\$0	\$0	0	a,b,i
B. Required Activities														
1) Initial stack test and report	Incl. in E.	varies	\$0	1	0	0	0	0	0	0	\$0	\$0	0	a
2) Annual stack test and test report	Incl. in E.	767	\$61,350	1	0	151	0	0	0	115,798	\$0	\$9,263,850	151	c
3) Operator training and qualification														
a) Establish and teach operator qualification course	64	0	\$0	1	64	0	0	0	0	0	\$0	\$0	0	a,b
b) Obtain operator qualification	72	0	\$0	1	72	0	0	0	0	0	\$0	\$0	0	a,b
c) Annual refresher course	12		\$0	1	12	63	756	38	76	0	\$49,426	\$0	63	c
d) Initial review of site-specific information	Incl. in a.													
e) Annual review of site-specific information	8	0	\$0	1	8	63	504	25	50	0	\$32,951	\$0	63	c
4) Establish operating parameters (maximum and minimum)	40	Incl. in B.1	\$0	1	40	0	0	0	0	0	\$0	\$0	0	a
5) Continuous parameter monitoring (including CEMS)														
a) Initial capital costs	0	0	\$0	1	0	0	0	0	0	0	\$0	\$0	0	a,d
b) Annualized capital and O&M costs	11	0	\$1,974	1	11	151	1,661	83	166	0	\$108,593	\$298,000	151	c,e
C. Create Information	Incl. in 3.B													
D. Gather Information	Incl. in 3.E													
E. Report Preparation														
1) Notification of initial performance test														
5) Continuous parameter monitoring (including CEMS)	2	0	\$0	1	2	0	0	0	0	0	\$0	\$0	0	
b) Fugitive Ash Emissions	1	0	\$0	1	1	0	0	0	0	0	\$0	\$0	0	
2) Notification of initial CMS Demonstration	2	0	\$0	1	2	0	0	0	0	0	\$0	\$0	0	b
3) Report of initial performance test														
a) Pollutants, opacity	8	0	\$7.50	1	8	0	0	0	0	0	\$0	\$0	0	
b) Fugitive Ash Emissions	2	0	\$0	1	2	0	0	0	0	0	\$0	\$0	0	
4) Report of initial CMS demonstration	Incl. in 3.B.5													
5) Report for site-specific parameter petition	14	0	\$0	1	14	0	0	0	0	0	\$0	\$0	0	a,f
6) Report of initial stack test	Incl. in 3.B.1													
7) Annual Report:														
a) Results of performance tests conducted during the year	40	0	\$7.50	1	40	151	6,040	302	604	0	\$394,883	\$1,133	151	
8) Status report for operators that are off-site for more than 2 weeks	8	0	\$0	1	8	7	56	3	6	0	\$3,661	\$0	7	g
9) Corrective action summary for operators that are off-site for more than 2 weeks	8	0	\$0	2	16	7	112	6	11	0	\$7,322	\$0	14	g
10) Semiannual report of emissions/parameter exceedances	24	0	\$7.50	2	48	7	336	17	34	0	\$21,967	\$105	14	h
ReportingSubtotal							9,465	473	947	115,798	\$618,803	\$9,563,088	614	

**Table 2.C - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines  
for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMM - Year 3, Multiple Hearth**

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	(E) Technical Hours Per Year (CXD)	(F) Management Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	(H) Emission Testing Contractor Hours Per Year	Total Labor Costs Per Year	Total Non-Labor Costs Per Year	Total Responses Per Year	Footnotes		
4. Recordkeeping Requirements																
A. Read Instructions	Incl. in 3.A															
B. Plan Activities	N/A															
C. Implement Activities	N/A															
D. Develop Record System	N/A															
E. Record Information																
1) Records of operating parameters	Incl. in 3.B.5	0	\$0	52	0	0	0	0	0	0	\$0	\$0	0			
2) Records of exceedances of the operating parameters	1.5	0	\$0	1	1.5	7	11	1	1	0	\$686	\$0	0	g		
3) Records of stack tests	Incl. in 3.E															
4) Records of persons who have reviewed operating procedures	1	0	\$0	1	1	63	63	3	6	0	\$4,119	\$0	0			
5) Records of persons who have completed operator training	1	0	\$0	1	1	63	63	3	6	0	\$4,119	\$0	0			
6) Records of persons who meet operator qualification criteria	1	0	\$0	1	1	63	63	3	6	0	\$4,119	\$0	0			
7) Records of monitoring device calibration	Incl. in 3.B															
8) Records of site-specific documentation	24	0	\$0	1	24	63	1,512	76	151	0	\$98,852	\$0	0			
F. Personnel Training	Incl. in 3.B															
G. Time for Audits	N/A															
<i>Recordkeeping Subtotal</i>							1711.5	85.575	171.15	0	\$111,895	\$0	0			
<b>TOTAL:</b>							11,177	559	1,118	115,798	\$730,698	\$9,563,088	614			
											Total Hours	Labor	Non-Labor	Total		
											Summary of Respondent Burden	12,853	\$730,698	\$9,563,088	\$10,293,785	
											Initial Capital and Startup			\$0		
											Annualized Capital/Start-up and O			\$9,563,088		

FOOTNOTES

- a One-time only costs.
- b Cost incurred by a facility regardless of the number of affected units at the plant.
- c Annual cost. Annual costs are not incurred until the second year of operation.
- d Based on the sum of the total capital costs for each monitoring system required for incinerators.
- e Based on the sum of the annualized capital costs for each monitoring system required for incinerators.
- f Assumed that none of the facilities will petition for site-specific parameters.
- g Assumed that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year. Assumed that this required only two corrective action summaries.
- h Assumed that 10 percent of the facilities would have an exceedance during the year.
- i Assumed \$100 for purchase of filing cabinet to house copy of rule, records and report copies.

**Table 2.D - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMMM - Multiple Hearth**

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Testing Contractor Hours <sup>a</sup>	Labor Costs	Non-Labor (Annualized Capital/Startup and O&M) Costs	Total Costs
1	18,936	947	1,894	21,776	110,956	\$1,237,966	\$9,182,038	\$10,420,004
2	11,177	559	1,118	12,853	115,798	\$730,698	\$9,563,088	\$10,293,785
3	11,177	559	1,118	12,853	115,798	\$730,698	\$9,563,088	\$10,293,785
Total	41,289	2,064	4,129	47,482	342,553	\$2,699,362	\$28,308,213	\$31,007,574
Average	13,763	688	1,376	15,827	114,184	\$899,787	\$9,436,071	\$10,335,858

**Table 3 - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Emissions Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart MMMM - All Subcategories**

Year	Technical Hours	Management Hours	Clerical Hours	Total Labor Hours	Testing Contractor Hours <sup>a</sup>	Labor Costs	Non-Labor (Annualized Capital/Startup and O&M) Costs	Total Costs
1	26,483	1,324	2,648	30,455	151,781	\$1,731,374	\$13,034,843	\$14,766,217
2	15,274	764	1,527	17,565	151,074	\$998,552	\$12,968,893	\$13,967,444
3	15,274	764	1,527	17,565	151,074	\$998,552	\$12,968,893	\$13,967,444
Total	57,030	2,851	5,703	65,584	453,930	\$3,728,477	\$38,972,628	\$42,701,105
Average	19,010	950	1,901	21,861	151,310	\$1,242,826	\$12,990,876	\$14,233,702

a. Test contractor costs are accounted for in the non-labor category and are not included in burden hours.

**Table 4 - Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the Emission Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart M - Year 1**

Burden Item	(A)		(B)	(C)	(D)	(E)	(F)
	Number of Occurrences Per Year		EPA Hours Per Occurrence	Tech Hours Per Year (C=AxB)	Management Hours Per Year (D=Cx0.05)	Clerical Hours Per Year (E=Cx0.1)	EPA Cost Per Year (a,b)
1. Applications	not applicable						
2. Read and Understand Rule Requirements	1		16	16	1	2	\$829
3. Required Activities							
A. Observe initial stack tests	39	b	48	1891	95	189	\$98,007
B. Excess emissions -- Enforcement Activities	11		24	264	13	26	\$13,681
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews							
1) Review initial stack test report	197		40	7880	394	788	\$408,361
2) Review annual compliance report	0		8	0	0	0	\$0
3) Review semi-annual excess emission and parameter exceedance report	22		16	352	18	35	\$18,241
4) Review status reports and corrective action summary for operators off-site	33		4	132	7	13	\$6,841
F. Prepare annual summary report	1	c	200	200	10	20	\$10,364
5. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =					\$881	per trip	\$34,721
TOTAL				10735	537	1074	\$591,045

FOOTNOTES

a Figures may not add exactly due to rounding.

b Assumes EPA personnel attend 20 percent of the initial stack tests.

c Using four hours per state to write annual summary report.

**Table 5 - Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the Emission Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart M M M M - Year 2**

Burden Item	(A)		(B)	(C)	(D)	(E)	(F)
	Number of Occurrences Per Year		EPA Hours Per Occurrence	Tech Hours Per Year (C=AxB)	Management Hours Per Year (D=Cx0.05)	Clerical Hours Per Year (E=Cx0.1)	EPA Cost Per Year (a,b)
1. Applications	not applicable						
2. Read and Understand Rule Requirements	1		16	16	1	2	\$829
3. Required Activities							
A. Observe initial stack tests	0	b	48	0	0	0	\$0
B. Excess emissions -- Enforcement Activities	11		24	264	13	26	\$13,681
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews							
1) Review initial stack test report	0		40	0	0	0	\$0
2) Review annual compliance report	197		8	1576	79	158	\$81,672
3) Review semi-annual excess emission and parameter exceedance report	22		16	352	18	35	\$18,241
4) Review status reports and corrective action summary for operators off-site	33		4	132	7	13	\$6,841
F. Prepare annual summary report	1	c	200	200	10	20	\$10,364
5. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =					\$0	per trip	\$0
TOTAL				2540	127	254	\$131,629

FOOTNOTES

a Figures may not add exactly due to rounding.

b Assumes EPA personnel attend 20 percent of the initial stack tests.

c Using four hours per state to write annual summary report.

**Table 6 - Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the Emission Guidelines for Existing Stationary Sources: Sewage Sludge Incineration Units - Subpart Mmmm - Year 3**

Burden Item	(A)		(B)	(C)	(D)	(E)	(F)
	Number of Occurrences Per Year		EPA Hours Per Occurrence	Tech Hours Per Year (C=AxB)	Management Hours Per Year (D=Cx0.05)	Clerical Hours Per Year (E=Cx0.1)	EPA Cost Per Year (a,b)
1. Applications	not applicable						
2. Read and Understand Rule Requirements	1		16	16	1	2	\$829
3. Required Activities							
A. Observe initial stack tests	0	b	48	0	0	0	\$0
B. Excess emissions -- Enforcement Activities	11		24	264	13	26	\$13,681
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews							
1) Review initial stack test report	0		40	0	0	0	\$0
2) Review annual compliance report	197		8	1576	79	158	\$81,672
3) Review semi-annual excess emission and parameter exceedance report	22		16	352	18	35	\$18,241
4) Review status reports and corrective action summary for operators off-site	33		4	132	7	13	\$6,841
F. Prepare annual summary report	1	c	200	200	10	20	\$10,364
5. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =					\$0	per trip	\$0
<b>TOTAL</b>				2540	127	254	\$131,629

FOOTNOTES

a Figures may not add exactly due to rounding.

b Assumes EPA personnel attend 20 percent of the initial stack tests.

c Using four hours per state to write annual summary report.

**Table 7 - Summary of Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the Emission Guidelines for Existing Stationary Sources:  
Sewage Sludge Incineration Units - Subpart M**

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs	Total Costs
1	10,735	537	1,074	12,345	\$591,045	\$0	\$591,045
2	2,540	127	254	2,921	\$131,629	\$0	\$131,629
3	2,540	127	254	2,921	\$131,629	\$0	\$131,629
Total	15,815	791	1,582	18,187	\$854,303	\$0	\$854,303
Average	5,272	264	527	6,062	\$284,768	\$0	\$284,768