

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal)
EPA ICR Number 1053.10, OMB Control Number 2060-0023**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal),
EPA ICR Number 1053.10, OMB Control Number 2060-0023

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS), for the Electric Utility Steam Generating Units (40 CFR 60, subpart Da) were proposed on September 18, 1978, and promulgated on June 11, 1979 (44 FR 33613). These regulations apply to the following facilities in 40 CFR part 60, subpart Da: those that have electric utility steam generating units which are capable of combusting more than 73 megawatts (MW) heat input of fossil fuel commencing construction, modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 60, subpart Da.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NSPS.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 677 facilities per year will be subject to the standard, and it is estimated that eleven additional sources per year will become subject to the standard in the next three years.

There are approximately 677 electric utility steam generating facilities in the United States, which are all publicly owned and operated by the electric utility steam generating industry. None of the 677 facilities in the United States are owned by either state, local, tribal or

the Federal Government. They are all owned and operated solely by privately owned for-profit businesses. The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost - NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal). The burden to the Federal government is attributed entirely to work performed by Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden - NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal).

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

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

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

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

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

In the Administrator's judgment, sulfur dioxide (SO₂), particulate matter (PM), and nitrogen oxide (NO_x) emissions from electric utility steam generating units cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS was promulgated for this source category at 40 CFR part 60, subpart Da.

2(b) Practical Utility/Users of the Data

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

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance tests, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standard is being met. The performance test may also be observed.

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

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

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

3(a) Non-duplication

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

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

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (75 FR 30813) on June 2, 2010. No comments were received on the burden published in the Federal Register.

3(c) Consultations

Over the next three years, an average of 677 facilities per year will be subject to the standard, with eleven additional sources per year becoming subject to the standard.

In estimating the affected number of sources, the growth rate, and the accuracy of other data for electric utility steam generating facilities subject to this standard, previous consultations were conducted with the Edison Electric Institute (EEI), Mr. Ed Yawn at (202) 508-5000, the Department of Energy, Mr. Tom Leckey at (202) 586-3548, and the Electric Power Research Institute (EPRI), Mr. Dan Rastler at (650) 855-2521. Additionally, the most recent ICR was referenced, and other internal resources used to obtain the most recent data available. Information was reviewed from the Online Tracking Information System (OTIS) which is the primary source of information regarding the number of existing sources. OTIS data was used in conjunction with industry consultation to verify the number of sources and the industry growth rate.

For this renewal, the same individuals from the Edison Electric Institute (EEI), the Department of Energy, and the Electric Power Research Institute (EPRI) were contacted for consultation regarding the accuracy of the EPA burden estimates. No comments were received in response.

3(d) Effects of Less Frequent Collection

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

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are source category description. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 4911, which corresponds to the North American Industry Classification System (NAICS) 221112 for source category description. The respondents to the recordkeeping and reporting requirements are electric utility steam generating units.

4(b) Information Requested

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

(i) Data Items

In this ICR, all the data recorded or reported is required by the New Source Performance Standards for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da).

A source must make the following reports:

Notifications	
Notification of construction or reconstruction	60.7(a)(1)
Notification of actual startup	60.7(a)(3)
Notification of initial performance test results	60.8(a), 60.49a(a)
Initial performance test	60.8(d)
Demonstration of continuous monitoring system	60.7(a)(5)
Monitoring system performance	60.7(c), 60.49a(i)
Physical or operational change	60.7(a)(4)
Daily operating parameter – emission controls	60.49a(b)
Monitoring system – minimum emissions data	60.49a(c)
Control system malfunction	60.49a(d)
Fuel treatment credit – SO ₂ ,	60.49a(e)
Data unavailability (SO ₂ , NO _x)	60.49a(f)
Minimum data requirements	60.49a(g)
Excess emissions	60.7(c), 60.49a(h)
Quarterly reporting	60.49a(j)
Semiannual reporting	60.49a(i)

A source must keep the following records:

Recordkeeping	
Maintain records of startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	60.7(b)
Reporting requirements	60.49a
Emissions monitoring	60.47a
Maintain all records for two years	60.7(f)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

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

electronic reporting.

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate continuous monitoring system (CMS) for opacity, or for pressure drop and liquid supply pressure for wet scrubber.
Perform initial performance test, Reference Method 3B, 5, 9, and 19, and repeat performance tests if necessary.
Write the notification and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way e.g., continuous parameter monitoring system. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

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

5(a) Agency Activities

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

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

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 operational. Performance test reports are used by the Agency to discern a source's initial capability to comply

with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into the Air Facility System (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 data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and 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 two years.

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses,) was taken into consideration during the development of the regulation. According to the EPA 2006 Final Rule (71 FR 9865) regarding amendments proposed to 40 CFR part 60, subparts Da, Db, and Dc, on February 28, 2005, “. . . at most, one entity out of five new entities in the industry may be small entities.” Applying this data to the respondent universe for this ICR results in approximately 135 small entities impacted by this ICR.

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

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden - NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever 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 160,839 (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 NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$116.05 (\$55.26 + 110%)
Technical	\$97.21 (\$46.29 + 110%)
Clerical	\$48.87 (\$23.27 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2010, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

The only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/ Startup Cost, (B×C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E×F)
SO ₂ , PM, and NO _x	\$200,000	11	\$2,200,000	\$15,000	677	\$10,155,000

The total capital/startup costs for this ICR are \$2,200,000. This is the total of column D

in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$10,155,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$12,355,000.

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 \$719,137.

This cost is based on the average hourly labor rate 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 the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden- NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 677 existing respondents will be subject to the standard. It is estimated that an additional eleven respondents per year will become subject. The overall average number of respondents, as shown in the table below is 677 per year.

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

Number of Respondents					
Year	(A) Number of New Respondents ^a	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	11	655	0	0	666
2	11	666	0	0	677

Number of Respondents					
Year	(A) Number of New Respondents ^a	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
3	11	677	0	0	688
Average	11	666	0	0	677

^a New respondent include sources with constructed, reconstructed and modified affected facilities. In this standard existing respondents submit initial notifications.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 677.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(B×C)+D
Notification of construction/reconstruction	11	1	n/a	11
Notification of actual startup	11	1	n/a	11
Notify of initial performance test	11	1.2	n/a	13.2
Notification of demonstration of CMS	11	1	n/a	11
Semiannual report	542	2	n/a	1,084
Quarterly report	135	4	n/a	540
TOTAL (rounded)				1,670

The number of total respondents is 677.

The number of Total Annual Responses is 1,670. This is the number in column E of the Respondent Universe and Number of Responses per year in table above.

The total annual labor costs are \$15,090,813. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden - NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal).

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

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

(i) Respondent Tally

The total annual labor costs are \$15,090,813. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal). Furthermore, the annual public

reporting and recordkeeping burden for this collection of information is estimated to average 96 hours per response.

The total annual capital/startup and O&M cost to the regulated entity are \$12,355,000.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 15,958 labor hours at a cost of \$719,137. See below Table 2: Annual Annual EPA Burden - NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal) .

6(f) Reasons for Change in Burden

There is no change in the labor hours in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden. It should be noted that an increase of one labor hour is shown due to more accurate rounding in the labor calculations.

The increase in labor cost to both Respondents and the Agency is due to labor rate adjustments to reflect the most recent available estimates.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 96 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's regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2010-0359. 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

content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search” than 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, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA–HQ–OECA–2010–0359 and OMB Control Number 2060-0023 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal)

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year (a)	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost {\$} (b)
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions	1	1	1	11	11	0.55	1.1	\$1,186.89
B. Required activities								
Initial emissions tests	160	1	160	11	1,760	88	176	\$189,903.12
Reference Method 9	4	30	120	11	1,320	66	132	\$142,427.34
Report performance test ^c	60	0.2	12	11	132	6.6	13.2	\$14,242.73
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
Notify of construction/reconstruction	2	1	2	11	22	1.1	2.2	\$2,373.79
Notify of actual startup	2	1	2	11	22	1.1	2.2	\$2,373.79
Notify of initial performance test	2	1.2	2.4	11	26.4	1.32	2.64	\$2,848.55
Notification of demonstration of CMS	2	1	2	11	22	1.1	2.2	\$2,373.79
Report of performance test	See 3B							
Semiannual report ^d	8	2	16	542	8,672	433.6	867.2	\$935,704.46
Quarterly report ^e	8	4	32	135	4,320	216	432	\$466,125.84
<i>Subtotal Reporting</i>						18,754		\$1,759,560.31
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	See 4C							
Implement activities	See 3B							
Develop record system	N/A							
C. Time to check computer system and calibrate continuous monitor ^f	0.5	365	182.5	677	123,552.50	6,177.62	12,355.25	\$13,331,252.39
D. Train personnel	N/A							
E. Audits	N/A							
<i>Subtotal Recordkeeping</i>						142,085		\$13,331,252.39

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Burden item	Person-hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=A×B)	Respondents per year (a)	Technical person-hours per year (E=C×D)	Management person-hours per year (E×0.05)	Clerical person-hours per year (E×0.1)	Cost {\$} (b)
TOTAL ANNUAL BURDEN AND COST (rounded)					160,839			\$15,090,813

Assumptions:

- ^a. We have assumed that the average number of respondents that will be subject to the rule will be 677. There will be eleven additional new sources per year that will become subject to the rule over the three-year period of this ICR.
- ^b. This ICR uses the following labor rates: \$116.05 per hour for Executive, Administrative, and Managerial labor; \$97.21 per hour for Technical labor, and \$48.87 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2010, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- ^c. We have assumed that 20 percent of initial performance test will be repeated due to failure.
- ^d. We have assumed that 80 percent of respondents will each take 8 hours two times per year to write the semiannual report.
- ^e. We have assumed that 20 percent of respondents will each take 8 hours four times per year to write the quarterly report.
- ^f. We have assumed that each respondent will take 30 minutes each day to check computer system and calibrate continuous monitors.

Table 2: Average Annual EPA Burden – NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal)

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=A×B)	(D) Plants per year (a)	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost {\$} (b)
Performance tests								
New plants	24	1.2	28.8	11	316.8	15.84	31.68	\$16,418.00
Review report of startup	40	1.2	48	11	528	26.4	52.8	\$27,363.34
Report Review								
Notification of construction	2	1	2	11	22	1.1	2.2	\$1,140.14
Notification of actual startup	0.5	1	0.5	11	5.5	0.275	0.55	\$285.03
Notification of initial test	0.5	1.2	0.6	11	6.6	0.33	0.66	\$342.04
Notification of CMS demonstration	0.5	1	0.5	11	5.5	0.275	0.55	\$285.03
Review excess emissions reports								
Semiannual	8	2	16	542	8,672	433.6	867.2	\$449,422.06
Quarterly	8	4	32	135	4,320	216	432	\$223,881.84
<i>Subtotal</i>					<i>13,876.40</i>	<i>693.82</i>	<i>1,387.64</i>	<i>\$719,137.49</i>
TOTAL ANNUAL BURDEN AND COST (rounded)						15,958		\$719,137

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 677. There will be eleven additional new sources that will become subject to the rule over the three-year period of this ICR.

^b The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$62.27 (GS-13, Step 5, \$38.92 + 60%), Technical rate of \$46.21 (GS-12, Step 1, \$28.88 + 60%), and Clerical rate of \$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 the benefit packages available to government employees.

^c We have assumed that it will take 40 hours to review each startup report.

^d We have assumed that it will take 8 hours two times per year to review each semiannual report.

^e We have assumed that it will take 8 hours four times per year to review each the quarterly report.