

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**National Emission Standards for Hazardous Air Pollutants from Coal- and Oil-fired
Electric Utility Steam Generating Units and Standards of Performance for Fossil-Fuel-
Fired Electric Utility, Industrial-Commercial-Institutional, and Small Industrial-
Commercial-Institutional Steam Generating Units
(40 CFR part 63, subpart UUUUU)**

Part A of the Supporting Statement

1. Identification of the Information Collection

(a) Title and Number of the Information Collection

“Recordkeeping and Reporting Requirements for Coal- and Oil-fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU).” The Office of Management and Budget (OMB) previously approved the information collection requirements for the Clean Air Mercury Rule (CAMR) in 2005. However, the ICR was discontinued because CAMR was vacated by a three-judge panel of the United States (U.S.) Court of Appeals for the District of Columbia Circuit (D.C. Circuit Court) on February 8, 2008, and the mandate effectuating the decision was issued on March 14, 2008 (as a result of a motion by the plaintiffs for expedited issuance of the mandate). Because that information collection was developed explicitly to determine compliance with CAMR, it was no longer needed. This is considered a new information collection request (ICR). The OMB control number is 2060-0567. The EPA ICR tracking number is 2137.05.

(b) Short Characterization

The U.S. Environmental Protection Agency (EPA or Agency) is proposing national emission standards for hazardous air pollutants (NESHAP) from coal- and oil-fired electric utility steam generating units (EGUs or Utility Units) under Clean Air Act (CAA) section 112(d) and proposing revised new source performance standards (NSPS) for fossil fuel-fired EGUs under CAA section 111(b).

On December 20, 2000, EPA determined pursuant to CAA section 112(n)(1)(A) that it was appropriate and necessary to regulate coal- and oil-fired EGUs under CAA section 112 and added such units to the CAA section 112(c) list of sources that must be regulated under CAA section 112(d) (see 65 FR 79825). On January 30, 2004, EPA proposed CAA section 112(d) standards for mercury (Hg) emissions from coal-fired EGUs and nickel (Ni) emissions from oil-fired EGUs, and, in the alternative, proposed to remove EGUs from the CAA section 112(c) list based on a finding that it was neither appropriate nor necessary to regulate EGUs pursuant to CAA section 112 (see 69 FR 4652). On March 29, 2005, EPA issued a final revision of the appropriate and necessary finding for coal- and oil-fired EGUs and removed such units from the CAA section 112(c) list of sources (Section 112(n) Revision Rule (Revision Rule) (see 70 FR 15994). EPA never finalized the proposed CAA section 112(d) standard. The removal of EGUs from the CAA section 112 list was challenged in the D.C. Circuit Court. On February 8, 2008, the D.C. Circuit Court vacated the Revision Rule after determining that EPA violated the CAA

by removing EGUs from the CAA section 112(c) list of sources without complying with the delisting requirements set forth in CAA section 112(c)(9). *State of New Jersey v. EPA*, 517 F.3d 583. Thus, EGUs remain a CAA section 112(c) listed source category.

In response to the D.C. Circuit Court’s vacatur, EPA is proposing CAA section 112(d) NESHAP for all coal- and oil-fired EGUs that reflect the application of the maximum achievable control technology (MACT) consistent with the requirements of CAA sections 112(d)(2) and (3). The proposed rule would protect air quality and promote public health by reducing emissions of the hazardous air pollutants (HAP) listed in CAA section 112(b).

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to the NESHAP.

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

Potential respondents are owners or operators of EGUs. The proposed NESHAP would establish emission limits for total particulate matter (PM), hydrogen chloride (HCl), and mercury (Hg) for coal-fired EGUs, and emission limits for Hg, total metal HAP, HCl, and hydrogen fluoride (HF) for oil-fired EGUs. To demonstrate compliance with these emission limits, owners or operators of EGUs would be required to continuously monitor PM, Hg, HF, and HCl emissions. Respondents would be required to maintain additional records to demonstrate compliance with Hg, HF, HCl, metal HAP, and PM limits and notify EPA of performance tests. These requirements are listed in Exhibit 1.

Exhibit 1. Source Data and Information Requirements

Requirement	Regulation Citation
Notifications	
Notification of Demonstration of continuous emissions monitoring system (CEMS)	63.10030
Notification of Initial Performance Test	63.10030
Quality Assurance Program Notification	63.10030
Notification of Compliance Status	63.10030
Request to use alternative monitoring procedure	63.10030
Initial notification	63.10030
Reports	
Report of Performance Test	63.10031
Startup, shutdown, and malfunction Report	63.10031
Semi-Annual Compliance Report	63.10031
Site-specific performance evaluation test plan	63.10031
Recordkeeping	
Existing Sources - Records of CEMS malfunctions	63.10032
Existing Sources - Records of Startups, Shutdowns, malfunctions, etc	63.10032
Existing Sources - Records of monthly fuel use	63.10032

EPA estimates that approximately 1,257 existing EGUs would be subject to the proposed NESHAP, and that no new EGUs will be built during the period of this information collection.

On February 27, 2006, EPA promulgated amendments to the new source performance standards (NSPS) for particulate matter (PM), sulfur dioxide (SO₂), and nitrogen oxides (NO_x) contained in the standards of performance for EGUs (40 CFR part 60, subpart Da, 71 FR 9866). EPA was subsequently sued by the offices of multiple States Attorneys General and environmental organizations on the amendments. On September 2, 2009, EPA was granted a voluntary remand without vacatur of the 2006 amendments. These proposed amendments are in response to the voluntary remand. We also are proposing several minor amendments, technical clarifications, and corrections to existing provisions of the fossil fuel-fired EGU and industrial-commercial-institutional, and small industrial-commercial-institutional steam generating units NSPS, subparts D, Db, and Dc of 40 CFR part 60. Because no new EGUs are projected to be built, there would be no recordkeeping and reporting burden associated with the proposed amendments.

2. Need for and Use of the Collection

(a) Need/Authority for the Collection

Section 112 of the CAA requires that EPA establish MACT standards for new or existing major or area sources according to the requirements in section 112(d). Certain records and reports are necessary for the Administrator to: (1) confirm the compliance status of major sources, identify any non-major sources not subject to the standards, and identify new or reconstructed sources subject to the standards; and (2) ensure that the MACT standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the CAA (42 U.S.C. 7414) and set out in the General Provisions for NESHAP in 40 CFR part 63, subpart A.

(b) Use/Users of the Data

The additional information will be used by Agency enforcement personnel to ensure that the emission limitations are being achieved. Based on review of the recorded information at the site and the reported information, EPA can identify facilities that may not be in compliance and decide which plants, records, or processes should be inspected.

3. Nonduplication, Consultations, and Other Collection Criteria

(a) Nonduplication

No other regulation currently requires the same information requested under this ICR from owners/operators of Coal- and Oil-fired EGUs or owners/operators of Fossil-Fuel-Fired Electric Utility, Industrial-Commercial-Institutional, and Small Industrial-Commercial-Institutional Steam Generating Units. In the event that certain reports required by State or local agencies may duplicate information required by the proposed requirements, a copy of the report submitted to the State or local agency can be provided to the Administrator in lieu of the information that would be required in the semi-annual compliance report. Therefore, no duplication exists.

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

The preamble to the final rule will provide public notice.

(c) *Consultations*

EPA met with 10 national organizations representing State and local elected officials to provide general background on the proposed NESHAP, answer questions, and solicit input from State/local governments. EPA also consulted with Tribal officials early in the process of developing the proposed NESHAP to permit them to have meaningful and timely input into its development. Consultation letters were sent to 584 Tribal leaders. The letters provided information regarding EPA's development of NESHAP for EGUs and offered consultation. Three consultation meetings were requested and held.

(d) *Effects of Less Frequent Collection*

If the relevant information were collected less frequently, EPA would not be reasonably assured that a plant is in compliance with the standards.

(e) *General Guidelines*

None of the guidelines in 5 CFR 1320.5 are being exceeded.

(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 01, 1976; amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

(g) *Sensitive Questions*

This section is not applicable because this ICR does not involve matters of a sensitive nature.

4. The Respondents and the Information Requested

(a) *Respondents/NAICS Codes*

Under the proposed NESHAP, respondents are 1,257 owners or operators of existing EGUs. It is estimated that no new EGUs will be built during the period of this information collection. All respondents will be subject to the monitoring, recordkeeping, and reporting requirements. The NAICS code for this industry is 221100, Electric Power Generation, Transmission and Distribution. There are no respondents under the proposed NSPS amendments because no new EGUs are projected to be built.

(b) *Information Requested*

(i) *Data Items, Including Recordkeeping Requirements.*

Exhibit 1 (Source Data and Information Requirements) summarizes the final recordkeeping and reporting requirements.

(ii) Respondent Activities.

The respondent activities required by the proposed NESHAP are introduced in section 6(a).

In setting the standards, the CAA requires us to consider alternative emission control approaches, taking into account the estimated costs and benefits, as well as the energy, solid waste and other effects. EPA requests comment on whether it has identified the appropriate alternatives and whether the proposed standards adequately take into consideration the incremental effects in terms of emission reductions, energy, and other effects of these alternatives. EPA will consider the available information in developing the final rule.

The costs, environmental, energy, and economic impacts are typically expressed as incremental differences between the impacts of owners/operators of facilities complying with the proposed NSPS amendments and the current NSPS emission standards (i.e., baseline). However, for EGUs this would not accurately represent actual costs and benefits of the proposed amendments. Requirements of the New Source Review (NSR) program often result in new utility units installing controls beyond what is required by the existing NSPS. In addition, owners/operators of new EGUs subject to the requirements of the Clean Air Transport Rule will likely elect to minimize operating costs by operating at SO₂ and NO_x emission rates lower than what is required by the existing NSPS. Finally, the EGU NESHAP PM and SO₂ standards for new facilities are as stringent or more stringent than the proposed NSPS amendments so we have concluded that there are no costs or benefits associated with those amendments. In addition, no new EGUs are projected to be built during the period of the information collection.

While multiple coal-fired EGUs have recently commenced operation and several are presently under construction, no new coal-fired power plants have commenced construction in either 2009 or 2010. In addition, forecasts of new generation capacity from both the Energy Information Administration and the Edison Electric Institute do not project any new coal-fired power plants will be constructed in the short term. This is an indication that in the near term there will not be any new coal-fired EGUs that would be subject to the NSPS amendments or the NESHAP requirements for new EGUs. Because of fuel supply availability and cost considerations, EPA projects no new oil-fired EGUs will be built during the next 5 years. Thus, there would not be any new oil-fired EGUs that would be subject to the NSPS amendments or the NESHAP requirements for new EGUs. All new natural gas-fired EGUs built in the foreseeable future are likely to be combined cycle units or combustion turbine peaking units and, thus not subject to subpart Da of 40 CFR part 60, but instead subject to the NSPS for combustion turbines under subpart KKKK of 40 CFR part 60.

(iii) Electronic Reporting.

EPA is proposing that utility units have the option of submitting to an EPA electronic database an electronic copy of their required stack test. This electronic database should become available as of December 31, 2011. Currently, sources are using monitoring equipment that provides automated parameter data (e.g., continuous opacity monitoring). Although personnel at the affected facility must evaluate these data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report such data electronically which also reduces the reporting burden. It is estimated that approximately 10 percent of the respondents currently use electronic reporting.

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

(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, and excess emissions reports, required to be submitted by industry.
Audit plant records.
Input, analyze, and maintain data in the AIRS Facility Subsystem (AFS) database.

(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semi-annual 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 AIRS Facility Subsystem (AFS) which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for over 125,000 industrial and government owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve, and analyze the data.

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

(c) Small Entity Flexibility

During this rulemaking, the Agency conducted outreach to small entities and convened a Small Business Advocacy Review (SBAR) Panel to obtain advice and recommendations of representatives of the small entities that potentially would be subject to the requirements of the proposed NESHAP. EPA met with these small entity representatives (SERs) to discuss the potential rulemaking approaches and potential options to decrease the impact of the rulemaking on their EGUs. Outreach materials were distributed to the SERs; these materials included background, project history, CAA section 112 overview, constraints on rulemaking, affected facilities, data, rulemaking options under consideration, potential control technologies and estimated costs, applicable small entity definitions, small entities potentially subject to regulation, and questions for SERs. EPA met with SERs that would be impacted directly by the proposed rule to discuss the outreach materials and receive feedback on the approaches and alternatives detailed in the outreach materials. The Panel received written comments from the

SERs following the meeting in response to discussions at the meeting and the questions posed to the SERs by the Agency. The SERs were specifically asked to provide comments on regulatory alternatives that could help to minimize the rule’s impact on small businesses.

(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Tables 1a-c and Exhibit 2: Respondent Burden of Reporting and Recordkeeping Requirements, NESHAP for Coal- and Oil-fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU).

6. Estimating the Burden and Cost of the Collection

Tables 1a, 1b, and 1c document the computation of individual burdens for the recordkeeping and reporting requirements of the proposed NESHAP applicable to the industry over the period of this information collection (i.e., for each of the first 3 years). Exhibit 2 contains a summary of the respondent burden hours and costs detailed in Tables 1a, 1b, and 1c.

Exhibit 2. Summary of Respondent Burden

Year	Total Annual Labor Burden (hours)	Total Annual Labor Costs (\$)
1	317,122	25,977,769
2	318,267	26,071,597
3	353,425	28,951,630
Total	988,814	81,000,996
3-Year Average	329,605	27,000,332

The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified; responses to this information collection are mandatory.

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

(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 329,605 hours per year (Total Labor Hours from Tables 1a, 1b, and 1c). 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.

(b) Estimating Respondent Costs

Respondent costs are divided into four categories. These categories include labor costs, capital costs (includes startup costs), operations and maintenance costs, and annualized capital costs. The total respondent costs (\$49,445,556) have been calculated as the sum of the annualized capital costs (including startup and the capitol recovery factor costs) (\$49,148,878) and the annual operation and maintenance costs (\$296,679).

(i) *Estimating Labor Costs*

Labor rates and associated costs are based on Bureau of Labor Statistics (BLS) data. Technical, management, and clerical average hourly rates for private industry workers were taken from United States Department of Labor, Bureau of Labor Statistics for NAICS 221100, May 2009 information, available at http://www.bls.gov/oes/current/naics4_221100.htm. Wages for technical labor are based on "Architecture and Engineering Occupations: Environmental Engineers" with a total compensation of \$40.04/hour. Wages for management labor are taken from "Management occupations: Engineering Managers" with a total compensation of \$56.31/hour. Wages for clerical labor are based on "Office and administrative support occupations" with a total compensation of \$20.04/hour. These rates represent salaries plus fringe benefits and do not include the cost of overhead. An overhead rate of 110 percent is used to account for these costs. The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$84.08, management at \$118.25, and clerical at \$42.08.

(ii) *Estimating Annualized Capital Costs*

The annualized capital costs associated with the information collection requirements will include the costs to conduct performance tests and startup costs for continuous emissions monitoring systems (CEMS). The rule will require an initial performance test for each EGU. Exhibit 3 shows the methods used for performance tests and the CEMS that are expected to be installed.

Exhibit 3. Performance Test Methods and CEMS Equipment by Pollutant

Pollutant	Performance Test Method	CEMS
PM	EPA Method 5 EPA Method 202 Method 29 (liquid oil fired EGUs only)	New beta gauge PM CEMS
HCl	Method 320	New FTIR CEMS
Hg	Method 29	New Hg CEMS
HF	Method 320 (liquid oil fired EGUs only)	New FTIR CEMS

The annual total capital (including startup) costs for CEMS that will be used to monitor PM, Hg, HF and HCl is \$49,148,878 per year. The costs will be incurred for each year of the three-year period. Note that these costs are considered “annualized” as they include the cost recovery factor costs in their individual CEMs costs.

The continuous monitoring costs that are included in this section consist only of those capital costs that a source incurs as a result of the standard. Some continuous monitoring costs may not be included in this section. For instance, if a particular industry typically utilizes a control device that must have a continuous monitor (e.g., temperature, pressure drop, etc.) to function properly, and the recordation of additional measurements beyond the minimum are required by the standard, then there is no capital cost; but, there is a labor cost to record the additional readings. Such a cost would not appear in this section, but in the industry burden Section 6(d) below.

Performance testing is usually conducted by a contractor such that the cost of the emissions testing is a capital cost. It is anticipated that existing EGUs will use CEMS for compliance with the proposed PM, HF, Hg, and HCl emission limits. Initial CEMS testing is usually conducted by an installation contractor such that the cost of the emissions testing is a capital cost. The total costs for performance testing were calculated for this industry sector. The number of existing and new sources in this sector combined with the number of tests required for each type of model plant resulted in a total annualized capital cost of approximately \$49,148,878 per year for CEMS testing over the next three years.

(iii) Estimating Operations and Maintenance (O&M) Costs

The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage. The total annual operations and maintenance costs for CEMS that will be used to monitor PM, HF, Hg, and HCl is \$296,679 per year.

The continuous monitoring costs that are included in this section consist only of those O&M costs that a source incurs as a result of the standard. Some continuous monitoring costs may not be included in this section. For instance, if a particular industry typically utilizes a control device that must have a continuous monitor (e.g., temperature, pressure drop, etc.) to function properly, and the recordation of additional measurements beyond the minimum are required by the standard, then there is no O&M cost, but there is a labor cost to record the additional readings. Such a cost would not appear in this section, but in the industry burden Section 6(d) below.

(iv) Annualizing Capital Costs

Under this memo, the annualized capital costs are included in the costs of the performance tests and CEMS (see explanation in Section 6(b)(ii)). The annualized capital costs total \$49,148,878.

(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 information collection requirements. Because reporting and recordkeeping requirements on the part of the

respondents are required under the NESHAP General Provisions, no operational costs will be incurred by the Federal Government. Publication and distribution of the information are part of the Compliance Data System, with the result that no Federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of sources that is part of EPA's overall compliance and enforcement program, and, therefore, is not attributable to the ICR. The only costs that the Federal government will incur are user costs associated with the analysis of the reported information, as presented in Tables 2a, 2b, and 2c. Exhibit 4 contains a summary of the agency burden costs and hours detailed in Tables 2a, 2b, and 2c. The average annual Agency costs during the three years of the ICR is estimated to be \$877,188.

Exhibit 4. Summary of the Agency Burden

Year	Total Annual Labor Burden (Hours)	Total Annual Costs (\$)
1	17,965	\$ 873,768
2	18,039	\$ 877,188
3	18,112	\$ 880,608
Total	54,116	\$ 2,631,564
3-Year Average	18,039	\$ 877,188

The Agency labor rates are from the Office of Personnel Management (OPM) 2003 General Schedule which excludes locality rates of pay. These rates can be obtained from Salary Table 2011-GS available on the OPM website (http://www.opm.gov/oca/11tables/html/gs_h.asp). The government employee labor rates are \$15.63/hour for clerical (GS-6, Step 3), \$28.88 for technical (GS-12, Step 1), and \$38.92/hr for management (GS-13, Step 5). These rates represent salaries plus fringe benefits and do not include the cost of overhead. An overhead rate of 60 percent is used to account for these costs. The fully-burdened wage rates used to represent Agency labor costs are: clerical at \$25.01; technical at \$46.21, and management at \$62.27.

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

Approximately 1,257 existing EGUs would be subject to the proposed NESHAP. It is estimated that no new EGUs will become subject to the regulation during the period of this information collection.

The total annual number of responses for the monitoring, recordkeeping, and reporting requirements in 40 CFR part 63 subpart UUUUU is 3,807 for the existing 1,257 EGUs that will follow the proposed NESHAP requirements.

The total annual labor costs are \$27,000,332. Details upon which this estimate is based appear in Tables 1a, 1b, and 1c.

(e) Bottom Line Burden Hours and Cost Tables

The bottom line burden hours and cost tables for both the Agency and the respondents are attached. The annual public reporting and recordkeeping burden for this collection of information is estimated to average 87 hours per response. The total annual average burden for the rule will be 329,605 person hours with a total annualized capital/startup cost of \$49,148,878.

(f) *Reasons for Change in Burden.*

The increase in burden is due to information collection activities that would be imposed by the NESHAP for Coal- and Oil-fired EGUs.

(g) *Burden Statement*

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 87 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 currently valid OMB control number. The OMB control numbers for EPA's regulations in 40 CFR part 63 are listed in 40 CFR part 9.

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-2009-0234, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket and Information Center is (202) 566-1742. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public 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 above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2009-0234 and OMB Control Number 2060-0567 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 the final amendments.

Table 1a. Year 1 Respondent Burden of Reporting and Recordkeeping Requirements, NESHAP for Electric Generating Units (40 CFR part 63, subpart UUUUU)

Year 1	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/ Year
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS ^a	16	1	16	419	6,704.0	335.2	670.4	\$631,550
4. REPORT REQUIREMENTS								
A. Read Instructions								
Existing Sources	1	1	1	419	419.0	21.0	41.9	\$39,472
New Sources	1	1	1	2	2.0	0.1	0.2	\$188
B. Required Activities								
Existing Sources- Initial Performance Test using M5 and M202	24	1	24	368	8,824.0	441.2	882.4	\$831,264
Existing Sources- Initial Performance Test using M29	24	1	24	419	10,056.0	502.8	1,005.6	\$947,325
Existing Sources- Initial Performance Test using M320	24	1	24	419	10,056.0	502.8	1,005.6	\$947,325
Existing Sources- Initial Performance Test using M6A	24	1	24	0	-	-	-	\$0
Existing Sources - Repeat M5 and 202 performance test every 2 years	24	1	24	0	-	-	-	\$0
Existing Sources - Repeat M29 performance test every 2 years	24	1	24	0	-	-	-	\$0
Existing Sources - Repeat M320 Performance Test every 2 years	24	1	24	0	-	-	-	\$0
Existing Sources - Repeat M6A Performance Test every 2 years	24	1	24	0	-	-	-	\$0
Existing Sources - CEMS Monitoring	0.5	1	0.5	419	209.5	10.5	21.0	\$19,736
Existing Sources - CEMS Quarterly Inspections	2	4	8	419	3,352.0	167.6	335.2	\$315,775

Year 1	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/ Year
Existing Sources - CEMS Daily Calibration Drift Tests	0.3	330	99	419	41,481.0	2,074.1	4,148.1	\$3,907,716
Existing Sources - Daily monitoring (CEMS)	0.3	330	99	419	41,481.0	2,074.1	4,148.1	\$3,907,716
Existing Sources -- All CEMS must follow appropriate performance specifications	0.3	330	99	419	41,481.0	2,074.1	4,148.1	\$3,907,716
New Sources- Initial Performance Test using M5 and M202	24	1	24	2	48.0	2.4	4.8	\$4,522
New Sources- Initial Performance Test using M29	24	1	24	2	48.0	2.4	4.8	\$4,522
New Sources- Initial Performance Test using M320	24	1	24	2	48.0	2.4	4.8	\$4,522
New Sources- Initial Performance Test using M6A	24	1	24	0	-	-	-	\$0
New Sources - Repeat M5 and 202 performance test every year	24	1	24	0	-	-	-	\$0
New Sources - Repeat M29 performance test every year	24	1	24	0	-	-	-	\$0
New Sources - Repeat M320 Performance Test every year	24	1	24	0	-	-	-	\$0
New Sources - Repeat M6A Performance Test every year	24	0	0	0	-	-	-	\$0
New Sources - CEMS Monitoring	0.5	1	0.5	2	1.0	0.1	0.1	\$94
New Sources - CEMS Quarterly Inspections	2	4	8	2	16.0	0.8	1.6	\$1,507
New Sources - CEMS Daily Calibration Drift Tests	0.3	330	99	2	198.0	9.9	19.8	\$18,653
New Sources - Daily monitoring (CEMS)	0.3	330	99	2	198.0	9.9	19.8	\$18,653
New Sources -- All CEMS must follow appropriate performance specifications	0.3	330	99	2	198.0	9.9	19.8	\$18,653
C. Create Information (Included in 4B)					-	-	-	\$0
D. Gather Existing Information (Included in 4E)								\$0

Year 1	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/ Year
					-	-	-	
E. Write Report					-	-	-	\$0
Existing Sources - Notification of Demonstration of CEMS	2	1	2	419	838.0	41.9	83.8	\$78,944
Existing Sources - Report of Performance Test (included in 4B)					-	-	-	\$0
Existing Sources - Notification of Initial Performance Test	2	1	2	419	838.0	41.9	83.8	\$78,944
Existing Sources - Quality Assurance Program Notification	2	1	2	419	838.0	41.9	83.8	\$78,944
Existing Sources - Startup, shutdown, and malfunction Report ^b	5	1	5	41.9	209.5	10.5	21.0	\$19,736
Existing Sources - Semi-Annual Compliance Report	24	2	48	419	20,112.0	1,005.6	2,011.2	\$1,894,650
Existing Sources - Notification of Compliance Status	4	1	4	419	1,676.0	83.8	167.6	\$157,887
Existing Sources - site-specific performance evaluation test plan	40	1	40	419	16,760.0	838.0	1,676.0	\$1,578,875
Existing Sources - request to use alternative monitoring procedure	5	1	5	41.9	209.5	10.5	21.0	\$19,736
New Sources - Initial notification	2	1	2	2	4.0	0.2	0.4	\$377
New Sources - Notification of Demonstration of CEMS	2	1	2	2	4.0	0.2	0.4	\$377
New Sources - Quality Assurance Program Notification	2	1	2	2	4.0	0.2	0.4	\$377
New Sources - Notification of Initial Performance Test	2	1	2	2	4.0	0.2	0.4	\$377
New Sources - Report of Performance Test (included in 4B)					-	-	-	\$0
New Sources - Startup, shutdown, and malfunction Report ^b	5	1	5	0.2	1.0	0.1	0.1	\$94
New Sources - Semi-Annual Compliance Report	24	2	48	2	96.0	4.8	9.6	\$9,044

Year 1	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/ Year
New Sources - Notification of Compliance Status	4	1	4	2	8.0	0.4	0.8	\$754
New Sources - site-specific performance evaluation test plan	40	1	40	2	80.0	4.0	8.0	\$7,536
New Sources - request to use alternative monitoring procedure	5	1	5	0.2	1.0	0.1	0.1	\$94
5. RECORDKEEPING REQUIREMENTS					-	-	-	\$0
A. Read Instructions (Included in 4A)					-	-	-	\$0
B. Plan Activities (Included in 4B)					-	-	-	\$0
C. Implement Activities (Included in 4B)					-	-	-	\$0
D. Record Data (Not Applicable)					-	-	-	\$0
E. Time to Transmit or Disclose Information					-	-	-	\$0
Existing Sources - Records of CEMS malfunctions	1.5	1	1.5	419	628.5	31.4	62.9	\$59,208
Existing Sources - Records of Startups, Shutdowns, malfunctions, etc	1.5	1	1.5	419	628.5	31.4	62.9	\$59,208
Existing Sources - Records of monthly fuel use	1.5	1	1.5	419	628.5	31.4	62.9	\$59,208
New Sources - Records of CEMS malfunctions	1.5	1	1.5	2	3.0	0.2	0.3	\$283
New Sources - Records of Startups, Shutdowns, malfunctions, etc	1.5	1	1.5	2	3.0	0.2	0.3	\$283
New Sources - Records of monthly fuel use	1.5	1	1.5	2	3.0	0.2	0.3	\$283
F. Time to Train Personnel	80	2	160	421	67,360.0	3,368.0	6,736.0	\$6,345,645
G. Time for Audits (Not Applicable)								
TOTAL ANNUAL LABOR BURDEN AND COST		2035		8,453	275,758	13,788	27,576	\$25,977,769

Year 1	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/ Year
						317,122	Hours	
ANNUALIZED CAPITAL COSTS								
Performance tests								\$ 19,500,300
Other Capital Costs of Installation (ODC and Labor)								\$29,648,578
Total annual capital								\$49,148,878
TOTAL ANNUAL COSTS (O&M)								\$296,679
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								\$49,445,556

^a There are 1,257 existing electric generating units. One third of those are assumed to be tested each year.

^b 10% of sources are assumed to submit SSM report each year.

Table 1b. Year 2 Respondent Burden of Reporting and Recordkeeping Requirements, NESHAP for Electric Generating Units (40 CFR part 63, subpart UUUUU)

Year 2	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent / Year (A x B)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/ Year
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS	16	1	16	421	6,736.0	336.8	673.6	\$634,565
4. REPORT REQUIREMENTS								
A. Read Instructions								
Existing Sources	1	1	1	421	421.0	21.1	42.1	\$39,660
New Sources	1	1	1	2	2.0	0.1	0.2	\$188
B. Required Activities								
Existing Sources- Initial Performance Test using M5 and M202	24	1	24	368	8,824.0	441.2	882.4	\$831,264
Existing Sources- Initial Performance Test using M29	24	1	24	419	10,056.0	502.8	1,005.6	\$947,325
Existing Sources- Initial Performance Test using M320	24	1	24	419	10,056.0	502.8	1,005.6	\$947,325
Existing Sources- Initial Performance Test using M6A	24	1	24	0	-	-	-	\$0
Existing Sources - Repeat M5 and 202 performance test every 2 years	24	1	24	0	-	-	-	\$0
Existing Sources - Repeat M29 performance test every 2 years	24	1	24	0	-	-	-	\$0
Existing Sources - Repeat M320 Performance Test every 2 years	24	1	24	0	-	-	-	\$0
Existing Sources - Repeat M6A Performance Test every 2 years	24	1	24	0	-	-	-	\$0
Existing Sources - CEMS Monitoring	0.5	1	0.5	421	210.5	10.5	21.1	\$19,830

Year 2	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent / Year (A x B)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/ Year
Existing Sources - CEMS Quarterly Inspections	2	4	8	421	3,368.0	168.4	336.8	\$317,282
Existing Sources - CEMS Daily Calibration Drift Tests	0.3	330	99	421	41,679.0	2,084.0	4,167.9	\$3,926,368
Existing Sources - Daily monitoring (CEMS)	0.3	330	99	421	41,679.0	2,084.0	4,167.9	\$3,926,368
Existing Sources -- All CEMS must follow appropriate performance specifications	0.3	330	99	421	41,679.0	2,084.0	4,167.9	\$3,926,368
New Sources- Initial Performance Test using M5 and M202	24	1	24	2	48.0	2.4	4.8	\$4,522
New Sources- Initial Performance Test using M29	24	1	24	2	48.0	2.4	4.8	\$4,522
New Sources- Initial Performance Test using M320	24	1	24	2	48.0	2.4	4.8	\$4,522
New Sources- Initial Performance Test using M6A	24	1	24	0	-	-	-	\$0
New Sources - Repeat M5 and 202 performance test every year	24	1	24	2	48.0	2.4	4.8	\$4,522
New Sources - Repeat M29 performance test every year	24	1	24	2	48.0	2.4	4.8	\$4,522
New Sources - Repeat M320 Performance Test every year	24	1	24	2	48.0	2.4	4.8	\$4,522
New Sources - Repeat M6A Performance Test every year	24	0	0	0	-	-	-	\$0
New Sources - CEMS Monitoring	0.5	1	0.5	2	1.0	0.1	0.1	\$94
New Sources - CEMS Quarterly Inspections	2	4	8	2	16.0	0.8	1.6	\$1,507
New Sources - CEMS Daily Calibration Drift Tests	0.3	330	99	2	198.0	9.9	19.8	\$18,653
New Sources - Daily monitoring (CEMS)	0.3	330	99	2	198.0	9.9	19.8	\$18,653
New Sources -- All CEMS must follow appropriate performance specifications	0.3	330	99	2	198.0	9.9	19.8	\$18,653

Year 2	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent / Year (A x B)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/ Year
C. Create Information (Included in 4B)					-	-	-	\$0
D. Gather Existing Information (Included in 4E)					-	-	-	\$0
E. Write Report					-	-	-	\$0
Existing Sources - Notification of Demonstration of CEMS	2	1	2	421	842.0	42.1	84.2	\$79,321
Existing Sources - Report of Performance Test (included in 4B)					-	-	-	\$0
Existing Sources - Notification of Initial Performance Test	2	1	2	421	842.0	42.1	84.2	\$79,321
Existing Sources - Quality Assurance Program Notification	2	1	2	421	842.0	42.1	84.2	\$79,321
Existing Sources - Startup, shutdown, and malfunction Report	5	1	5	42.1	210.5	10.5	21.1	\$19,830
Existing Sources - Semi-Annual Compliance Report	24	2	48	421	20,208.0	1,010.4	2,020.8	\$1,903,694
Existing Sources - Notification of Compliance Status	4	1	4	421	1,684.0	84.2	168.4	\$158,641
Existing Sources - site-specific performance evaluation test plan	40	1	40	421	16,840.0	842.0	1,684.0	\$1,586,411
Existing Sources - request to use alternative monitoring procedure	5	1	5	42.1	210.5	10.5	21.1	\$19,830
New Sources - Initial notification	2	1	2	2	4.0	0.2	0.4	\$377
New Sources - Notification of Demonstration of CEMS	2	1	2	2	4.0	0.2	0.4	\$377
New Sources - Quality Assurance Program Notification	2	1	2	2	4.0	0.2	0.4	\$377
New Sources - Notification of Initial Performance Test	2	1	2	2	4.0	0.2	0.4	\$377
New Sources - Report of Performance Test (included in 4B)					-	-	-	\$0

Year 2	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent / Year (A x B)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/ Year
New Sources - Startup, shutdown, and malfunction Report	5	1	5	0.2	1.0	0.1	0.1	\$94
New Sources - Semi-Annual Compliance Report	24	2	48	2	96.0	4.8	9.6	\$9,044
New Sources - Notification of Compliance Status	4	1	4	2	8.0	0.4	0.8	\$754
New Sources - site-specific performance evaluation test plan	40	1	40	2	80.0	4.0	8.0	\$7,536
New Sources - request to use alternative monitoring procedure	5	1	5	0.2	1.0	0.1	0.1	\$94
5. RECORDKEEPING REQUIREMENTS					-	-	-	\$0
A. Read Instructions (Included in 4A)					-	-	-	\$0
B. Plan Activities (Included in 4B)					-	-	-	\$0
C. Implement Activities (Included in 4B)					-	-	-	\$0
D. Record Data (Not Applicable)					-	-	-	\$0
E. Time to Transmit or Disclose Information					-	-	-	\$0
Existing Sources - Records of CEMS malfunctions	1.5	1	1.5	421	631.5	31.6	63.2	\$59,490
Existing Sources - Records of Startups, Shutdowns, malfunctions, etc	1.5	1	1.5	421	631.5	31.6	63.2	\$59,490
Existing Sources - Records of monthly fuel use	1.5	1	1.5	421	631.5	31.6	63.2	\$59,490
New Sources - Records of CEMS malfunctions	1.5	1	1.5	2	3.0	0.2	0.3	\$283
New Sources - Records of Startups, Shutdowns, malfunctions, etc	1.5	1	1.5	2	3.0	0.2	0.3	\$283
New Sources - Records of monthly fuel use	1.5	1	1.5	2	3.0	0.2	0.3	\$283

Year 2	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent / Year (A x B)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/ Year
F. Time to Train Personnel	80	2	160	421	67,360.0	3,368.0	6,736.0	\$6,345,645
G. Time for Audits (Not Applicable)								
TOTAL ANNUAL LABOR BURDEN AND COST		2035		8,491	276,754	13,838	27,675	\$26,071,597
						318,267	Hours	
ANNUALIZED CAPITAL COSTS								
Performance tests								\$19,500,300
Other Capital Costs of Installation (ODC and Labor)								\$29,648,578
Total annual capital								\$49,148,878
TOTAL ANNUAL COSTS (O&M)								\$296,679
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								\$49,445,556

^a There are 1,257 existing electric generating units. One third of those are assumed to be tested each year.

^b 10% of sources are assumed to submit SSM report each year.

Table 1c. Year 3 Respondent Burden of Reporting and Recordkeeping Requirements, NESHAP for Electric Generating Units (40 CFR part 63, subpart UUUUU)

Year 3	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent / Year (A x B)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/ Year (E x 0.10)	(H) Cost/ Year
1. APPLICATIONS (Not Applicable)								
2. SURVEY AND STUDIES (Not Applicable)								
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS	16	1	16	423	6,768.0	338.4	676.8	\$637,579
4. REPORT REQUIREMENTS								
A. Read Instructions								
Existing Sources	1	1	1	423	423.0	21.2	42.3	\$39,849
New Sources	1	1	1	2	2.0	0.1	0.2	\$188
B. Required Activities								
Existing Sources- Initial Performance Test using M5 and M202	24	1	24	368	8,824.0	441.2	882.4	\$831,264
Existing Sources- Initial Performance Test using M29	24	1	24	419	10,056.0	502.8	1,005.6	\$947,325
Existing Sources- Initial Performance Test using M320	24	1	24	419	10,056.0	502.8	1,005.6	\$947,325
Existing Sources- Initial Performance Test using M6A	24	1	24	0	-	-	-	\$0
Existing Sources - Repeat M5 and 202 performance test every 2 years	24	1	24	368	8,824.0	441.2	882.4	\$831,264
Existing Sources - Repeat M29 performance test every 2 years	24	1	24	419	10,056.0	502.8	1,005.6	\$947,325
Existing Sources - Repeat M320 Performance Test every 2 years	24	1	24	419	10,056.0	502.8	1,005.6	\$947,325
Existing Sources - Repeat M6A Performance Test every 2 years	24	1	24	0	-	-	-	\$0
Existing Sources - CEMS Monitoring	0.5	1	0.5	423	211.5	10.6	21.2	\$19,924
Existing Sources - CEMS Quarterly Inspections	2	4	8	423				\$318,790

Year 3	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent / Year (A x B)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/Year
					3,384.0	169.2	338.4	
Existing Sources - CEMS Daily Calibration Drift Tests	0.3	330	99	423	41,877.0	2,093.9	4,187.7	\$3,945,021
Existing Sources - Daily monitoring (CEMS)	0.3	330	99	423	41,877.0	2,093.9	4,187.7	\$3,945,021
Existing Sources -- All CEMS must follow appropriate performance specifications	0.3	330	99	423	41,877.0	2,093.9	4,187.7	\$3,945,021
New Sources- Initial Performance Test using M5 and M202	24	1	24	2	48.0	2.4	4.8	\$4,522
New Sources- Initial Performance Test using M29	24	1	24	2	48.0	2.4	4.8	\$4,522
New Sources- Initial Performance Test using M320	24	1	24	2	48.0	2.4	4.8	\$4,522
New Sources- Initial Performance Test using M6A	24	1	24	0	-	-	-	\$0
New Sources - Repeat M5 and 202 performance test every year	24	1	24	4	96.0	4.8	9.6	\$9,044
New Sources - Repeat M29 performance test every year	24	1	24	4	96.0	4.8	9.6	\$9,044
New Sources - Repeat M320 Performance Test every year	24	1	24	4	96.0	4.8	9.6	\$9,044
New Sources - Repeat M6A Performance Test every year	24	0	0	0	-	-	-	\$0
New Sources - CEMS Monitoring	0.5	1	0.5	2	1.0	0.1	0.1	\$94
New Sources - CEMS Quarterly Inspections	2	4	8	2	16.0	0.8	1.6	\$1,507
New Sources - CEMS Daily Calibration Drift Tests	0.3	330	99	2	198.0	9.9	19.8	\$18,653
New Sources - Daily monitoring (CEMS)	0.3	330	99	2	198.0	9.9	19.8	\$18,653
New Sources -- All CEMS must follow appropriate performance specifications	0.3	330	99	2	198.0	9.9	19.8	\$18,653
C. Create Information (Included in 4B)								\$0

Year 3	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent / Year (A x B)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/Year
					-	-	-	
D. Gather Existing Information (Included in 4E)					-	-	-	\$0
E. Write Report					-	-	-	\$0
Existing Sources - Notification of Demonstration of CEMS	2	1	2	423	846.0	42.3	84.6	\$79,697
Existing Sources - Report of Performance Test (included in 4B)					-	-	-	\$0
Existing Sources - Notification of Initial Performance Test	2	1	2	423	846.0	42.3	84.6	\$79,697
Existing Sources - Quality Assurance Program Notification	2	1	2	423	846.0	42.3	84.6	\$79,697
Existing Sources - Startup, shutdown, and malfunction Report	5	1	5	42.3	211.5	10.6	21.2	\$19,924
Existing Sources - Semi-Annual Compliance Report	24	2	48	423	20,304.0	1,015.2	2,030.4	\$1,912,737
Existing Sources - Notification of Compliance Status	4	1	4	423	1,692.0	84.6	169.2	\$159,395
Existing Sources - site-specific performance evaluation test plan	40	1	40	423	16,920.0	846.0	1,692.0	\$1,593,948
Existing Sources - request to use alternative monitoring procedure	5	1	5	42.3	211.5	10.6	21.2	\$19,924
New Sources - Initial notification	2	1	2	2	4.0	0.2	0.4	\$377
New Sources - Notification of Demonstration of CEMS	2	1	2	2	4.0	0.2	0.4	\$377
New Sources - Quality Assurance Program Notification	2	1	2	2	4.0	0.2	0.4	\$377
New Sources - Notification of Initial Performance Test	2	1	2	2	4.0	0.2	0.4	\$377
New Sources - Report of Performance Test (included in 4B)					-	-	-	\$0
New Sources - Startup, shutdown, and malfunction Report	5	1	5	0.2				\$94

Year 3	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent / Year (A x B)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/Year
					1.0	0.1	0.1	
New Sources - Semi-Annual Compliance Report	24	2	48	2	96.0	4.8	9.6	\$9,044
New Sources - Notification of Compliance Status	4	1	4	2	8.0	0.4	0.8	\$754
New Sources - site-specific performance evaluation test plan	40	1	40	2	80.0	4.0	8.0	\$7,536
New Sources - request to use alternative monitoring procedure	5	1	5	0.2	1.0	0.1	0.1	\$94
5. RECORDKEEPING REQUIREMENTS					-	-	-	\$0
A. Read Instructions (Included in 4A)					-	-	-	\$0
B. Plan Activities (Included in 4B)					-	-	-	\$0
C. Implement Activities (Included in 4B)					-	-	-	\$0
D. Record Data (Not Applicable)					-	-	-	\$0
E. Time to Transmit or Disclose Information					-	-	-	\$0
Existing Sources - Records of CEMS malfunctions	1.5	1	1.5	423	634.5	31.7	63.5	\$59,773
Existing Sources - Records of Startups, Shutdowns, malfunctions, etc	1.5	1	1.5	423	634.5	31.7	63.5	\$59,773
Existing Sources - Records of monthly fuel use	1.5	1	1.5	423	634.5	31.7	63.5	\$59,773
New Sources - Records of CEMS malfunctions	1.5	1	1.5	2	3.0	0.2	0.3	\$283
New Sources - Records of Startups, Shutdowns, malfunctions, etc	1.5	1	1.5	2	3.0	0.2	0.3	\$283
New Sources - Records of monthly fuel use	1.5	1	1.5	2	3.0	0.2	0.3	\$283
F. Time to Train Personnel	80	2	160	425				\$6,405,937

Year 3	(A) Hours per Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent / Year (A x B)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(H) Cost/Year
G. Time for Audits (Not Applicable)					68,000.0	3,400.0	6,800.0	
TOTAL ANNUAL LABOR BURDEN AND COST		2035		9,739	307,326	15,366	30,733	\$28,951,630
						353,425	Hours	
ANNUALIZED CAPITAL COSTS								
Performance tests								\$ 19,500,300
Other Capital Costs of Installation (ODC and Labor)								\$ 29,648,578
Total annual capital								\$ 49,148,878
TOTAL ANNUAL COSTS (O&M)								\$296,679
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								\$49,445,556

^a There are 1,257 existing electric generating units. One third of those are assumed to be tested each year.

^b 10% of sources are assumed to submit SSM report each year.

Table 2a. Year 1 Agency Burden and Cost, NESHAP for Electric Generating Units (40 CFR part 63, subpart UUUUU)

Activity -- Year 1	(A) EPA Hours/ Occurrence	(B) Occurrences / Plant/Year	(C) EPA Hours/ Plant/Year (A x B)	(D) Plants/ Year	(E) EPA Technical Hours/ Year (C x D)	(F) EPA Managerial Hours/Year	(G) EPA Clerical Hours/Year	(H) Cost, \$
Observe Initial Performance Tests	24	1	24	84.13	2019.2	100.96	20.192	\$ 100,095
Observe Repeat Performance Tests	24	0.2	4.8	84.13	403.84	20.192	4.0384	\$ 20,019
Review Notification of Demonstration of CEMS	0.5	1	0.5	421.00	210.5	10.525	2.105	\$ 10,435
Review Quality Assurance Program Notification	0.5	1	0.5	421.00	210.5	10.525	2.105	\$ 10,435
Review Startup, shutdown, and malfunction Report	8	1	8	421.00	3368	168.4	33.68	\$ 166,957
Review Notification of Compliance Status	0.5	1	0.5	421.00	210.5	10.525	2.105	\$ 10,435
Review requests to use alternative monitoring procedure	0.5	1	0.5	421.00	210.5	10.525	2.105	\$ 10,435
Review Initial Notifications	0.5	1	0.5	2.00	1	0.05	0.01	\$ 50
Review Notification of performance test	0.5	1	0.5	421.00	210.5	10.525	2.105	\$ 10,435
Review Test/CEMS Results	8	1	8	421.00	3368	168.4	33.68	\$ 166,957
Review site specific performance evaluation test plan	8	1	8	421.00	3368	168.4	33.68	\$ 166,957
Review Semi-Annual reports	8	1	8	421.00	3368	168.4	33.68	\$ 166,957
Total Annual Hours					16,949	847.427	169.4854	\$ 840,168
						17,965.45	hours	
Travel Expenses								\$ 33,600
								\$ 873,768

EPA Officials are assumed to attend 20% of performance tests

Travel Expenses = (1 person x 84 plants/year x 3 days/plant x \$50 per diem) + (\$250 round trip/plant x 84 plants/year) = \$33,600/year

Assume visit 84 plants per year

Table 2b. Year 2 Agency Burden and Cost, NESHAP for Electric Generating Units (40 CFR part 63, subpart UUUUU)

Activity -- Year 2	(A) EPA Hours/ Occurrence	(B) Occurrences / Plant/Year	(C) EPA Hours/ Plant/Year (A x B)	(D) Plants/ Year	(E) EPA Technical Hours/ Year (C x D)	(F) EPA Managerial Hours/Year	(G) EPA Clerical Hours/Year	(H) Cost, \$
Observe Initial Performance Tests	24	1	24	84.13	2019.2	100.96	20.192	\$ 100,095
Observe Repeat Performance Tests	24	0.2	4.8	84.13	403.84	20.192	4.0384	\$ 20,019
Review Notification of Demonstration of CEMS	0.5	1	0.5	423.00	211.5	10.575	2.115	\$ 10,484
Review Quality Assurance Program Notification	0.5	1	0.5	423.00	211.5	10.575	2.115	\$ 10,484
Review Startup, shutdown, and malfunction Report	8	1	8	423.00	3384	169.2	33.84	\$ 167,751
Review Notification of Compliance Status	0.5	1	0.5	423.00	211.5	10.575	2.115	\$ 10,484
Review requests to use alternative monitoring procedure	0.5	1	0.5	423.00	211.5	10.575	2.115	\$ 10,484
Review Initial Notifications	0.5	1	0.5	2.00	1	0.05	0.01	\$ 50
Review Notification of performance test	0.5	1	0.5	423.00	211.5	10.575	2.115	\$ 10,484
Review Test/CEMS Results	8	1	8	423.00	3384	169.2	33.84	\$ 167,751
Review site specific performance evaluation test plan	8	1	8	423.00	3384	169.2	33.84	\$ 167,751
Review Semi-Annual reports	8	1	8	423.00	3384	169.2	33.84	\$ 167,751
Total Annual Hours					17,018	850.877	170.1754	\$ 843,588
						18,038.59	hours	
Travel Expenses								\$ 33,600
								\$ 877,188

EPA Officials are assumed to attend 20% of performance tests

Travel Expenses = (1 person x 84 plants/year x 3 days/plant x \$50 per diem) + (\$250 round trip/plant x 84 plants/year) = \$33,600/year

Assume visit 84 plants per year

Table 2c. Year 3 Agency Burden and Cost, NESHAP for Electric Generating Units (40 CFR part 63, subpart UUUUU)

Activity -- Year 3	(A) EPA Hours/Occurrence	(B) Occurrences / Plant/Year	(C) EPA Hours/Plant/Year (A x B)	(D) Plants / Year	(E) EPA Technical Hours/ Year (C x D)	(F) EPA Managerial Hours/Year	(G) EPA Clerical Hours/Year	(H) Cost, \$
Observe Initial Performance Tests	24	1	24	84.13	2019.2	100.96	20.192	\$ 100,095
Observe Repeat Performance Tests	24	0.2	4.8	84.13	403.84	20.192	4.0384	\$ 20,019
Review Notification of Demonstration of CEMS	0.5	1	0.5	425.00	212.5	10.625	2.125	\$ 10,534
Review Quality Assurance Program Notification	0.5	1	0.5	425.00	212.5	10.625	2.125	\$ 10,534
Review Startup, shutdown, and malfunction Report	8	1	8	425.00	3400	170	34	\$ 168,544
Review Notification of Compliance Status	0.5	1	0.5	425.00	212.5	10.625	2.125	\$ 10,534
Review requests to use alternative monitoring procedure	0.5	1	0.5	425.00	212.5	10.625	2.125	\$ 10,534
Review Initial Notifications	0.5	1	0.5	2.00	1	0.05	0.01	\$ 50
Review Notification of performance test	0.5	1	0.5	425.00	212.5	10.625	2.125	\$ 10,534
Review Test/CEMS Results	8	1	8	425.00	3400	170	34	\$ 168,544
Review site specific performance evaluation test plan	8	1	8	425.00	3400	170	34	\$ 168,544
Review Semi-Annual reports	8	1	8	425.00	3400	170	34	\$ 168,544
Total Annual Hours					17,087	854.327	170.8654	\$ 847,008
						18,111.73	hours	
Travel Expenses								\$ 33,600
								\$ 880,608

EPA Officials are assumed to attend 20% of performance tests

Travel Expenses = (1 person x 84 plants/year x 3 days/plant x \$50 per diem) + (\$250 round trip/plant x 84 plants/year) = \$33,600/year

Assume visit 84 plants per year