

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999 (40 CFR Part 60, Subpart BBBB) (Renewal)**

**1. Identification of the Information Collection**

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

NSPS for Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999 (40 CFR Part 60, Subpart BBBB) (Renewal), EPA ICR Number 1901.05, OMB Control Number 2060-0424

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

The New Source and Performance Standards (NSPS) for Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999 (aka: "Emission Guidelines") (40 part 60, subpart BBBB) were originally promulgated in December 1995, but were vacated by the Federal Court in March 1997. Subsequently, the Emission Guidelines were re-proposed on August 30, 1999, and promulgated on December 6, 2000 (65 FR76378). The Emission Guidelines regulate organics (dioxin/furans), metals (cadmium, lead, mercury, and particulate matter), and acid gases (hydrogen chloride, sulfur dioxide, and nitrogen oxides) for small Municipal Waste Combustion (MWC) units. Small MWC units are MWC units with capacities to combust greater than 35 tons per day (tpd) and less than 250 tons per day (tpd) of municipal solid waste. The Emission Guidelines contain monitoring, reporting, and recordkeeping requirements that are to be included in state plans. This Information Collection Request (ICR) identifies the burden to respondents (i.e., small MWCs) that will be imposed by state plans developed to implement the Emission Guidelines. This information is being collected to assure compliance with 40 CFR part 60, subpart BBBB.

In general, all Emission Guidelines 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 reports and records are essential in determining compliance and are required of all affected facilities subject to the Emission Guidelines.

Any owner/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. Environmental Protection Agency (EPA) regional office.

Based on our consultation with industry representatives, there is an average of 2.3

affected facilities 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 54 facilities located at 23 plants is currently subject to the Emission Guidelines. Since the Emission Guidelines only apply to sources that commenced construction on or before August 30, 1999, no additional MWC units will become subject to the standard over the next three years.

The active (previous) ICR had the following Terms of Clearance (TOC);

This collection of information is approved for 3 years. Prior to requesting extension of this approval, the Agency should reassess burden taking into account recent experience with the program, including number of sources and burden estimates.

EPA addressed each item of concern in the TOC. The respondent universe and burden estimates have been thoroughly checked and all estimates updated.

The “Affected Public” is owners and operators of existing small MWC units. The burden to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999 (40 CFR Part 60, Subpart BBBB) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by either Federal employees or government contractors, and may be found below in Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999 (40 CFR Part 60, Subpart BBBB) (Renewal).

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

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

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

. . . prescribe regulations which shall establish a procedure similar to that provided by section 110 under which each State shall submit to the Administrator a plan which (A) establishes standards of performance for any existing source for any air pollutant (i) for which air quality criteria have not been issued or which is not included on a list published under section 108(a) . . . but (ii) to which a standard of performance under this section would apply if such existing source were a new source, and (B) provides for the implementation and enforcement of such standards of performance.

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

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

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

Section 129(a)(2) states:

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

Section 129(b)(1) states:

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

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

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

or continuous basis to -

- (A) establish and maintain such records;
- (B) make such reports;
- (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods;
- (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods and in such manner as the Administrator shall prescribe);
- (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical;
- (F) submit compliance certifications in accordance with section 114(a)(3); and
- (G) provide such other information, as the Administrator may reasonably require; . . .

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

The recordkeeping and reporting requirements in the standards 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 standards. Continuous emission monitors are used to ensure compliance with the standards at all times. During the performance test, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standards 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 check if the pollution control devices are properly installed and operated and the standards are being met. The performance test may also be observed.

The required semiannual 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 BBBB.

### **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 its 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, duplication does not exist.

### **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 (77 FR 47631) on August 9, 2012. No comments were received on the burden published in the Federal Register.

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

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard is the Online Tracking Information System (OTIS), which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of all compliance data.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we contacted: 1) the Solid Waste Association of North America (SWANA), at (240) 494-2253; 2) the National Solid Waste Management Association (NSWMA), at (202) 364-3773; 3) Veolia ES Solid Waste at (414) 479-7883; and 4) Covanta, at (973) 882-7253. EPA did not receive any comments from the consultations.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice.

### **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.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to: establish the compliance history of a source, detect any pattern of non-compliance, and determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

### **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**

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

## **4. The Respondents and the Information Requested**

### **4(a) Respondents/SIC Codes**

The respondents to the recordkeeping and reporting requirements are owners and operators of small MWC units. The United States Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standards are shown in the table below.

<b>40 CFR Part 60, Subpart BBBB</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Air and Water Resource and Solid Waste Management	9511	92411
Refuse System; Solid Waste Combustors and Incinerators	4953	562213

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

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

In this ICR, all the data that is recorded or reported is required by Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before

August 30, 1999 (40 CFR part 60, subpart BBBB).

A source must make the following reports:

<b>1Notifications</b>	
Construction/reconstruction	60.7(a)(1)
Notification of completion of each increment of progress	60.1585
Actual startup	60.7(a)(3),
Demonstration of continuous monitoring system	60.7(a)(5)
Physical or operational change	60.7(a)(4)

<b>1Reports</b>	
Initial report	60.8 (a) & (d), 60.1860, 60.1875
Annual Report	60.1680, 60.1880
Semiannual reports for any emission or parameter that does not meet limits	60.1680, 60.1890, 60.1895, 60.1900

A source must keep the following records:

<b>1Recordkeeping</b>	
Startups, shutdowns, and malfunctions, periods where the continuous monitoring system is inoperative.	60.7(b)
Emission test results and other data needed to determine emissions.	60.1830, 60.1835, 60.1845
Operator training & certification	60.1830, 60.1835, 60.1840
Record for MWCs using activated carbon	60.1830, 60.1835, 60.1855
Records for continuously monitored pollutants or parameters.	60.1830, 60.1850
Records are required to be retained for 5 Years. All five years of records must be retained at the facility.	60.1835

### 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.

## (ii) Respondent Activities

<b>1 Respondent Activities</b>
Read instructions.
Install, calibrate, maintain, and operate CEMS for SO <sub>2</sub> , NO <sub>x</sub> , opacity, CO, CO <sub>2</sub> & O <sub>2</sub> .
Perform initial performance test and reports (PM, dioxin/furans, opacity, fugitives, HCL, Cd, Pb, Hg), and repeat performance tests if necessary.
Write and submit the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Perform quarterly Appendix F audits of CEMS (SO <sub>2</sub> , NO <sub>x</sub> , CO)
Develop, acquire, install, and utilize technology and systems for the purpose of processing, maintaining, 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.

<b>Agency Activities</b>
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 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 could 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 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 OTIS which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the OTIS 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/operator for five years.

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

Some of the small MWC units potentially affected by the Emission Guidelines are owned by small businesses, non-profit organizations or governments. The EPA does not expect the standards to adversely affect these small entities. The standards only apply to units with capacities between 35 tpd and 250 tpd. Furthermore, the standards contain provisions for reduced testing. Owners of small MWC units where the aggregate plant capacity is less than 250 tpd can skip annual tests for 2-year periods for certain pollutants if they have demonstrated compliance for three annual tests in a row. In addition to this 3-year testing option, less frequent dioxin/furan testing is possible if all units at a plant achieve emission levels less than the emission limit for two consecutive years. This provision allows plants to test only one unit per year, rather than all units, as normally required.

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

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999 (40 CFR Part 60, Subpart BBBB) (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 100,854 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

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

#### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$121.44 (\$57.83 + 110%)
Technical	\$100.23 (\$47.73 + 110%)
Clerical	\$ 50.51 (\$24.05 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March, 2012, “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 type of industry costs associated with the information collection activities in the subject standards 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 monitors and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Source (i.e., Affected Facility)	(C) Number of New Sources	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Sources	(F) Number of Sources with O&M	(G) Total O&M, (E X F)
Load monitors, temperature monitors, and carbon federate monitors (Sections 60.1315 thru 60.1335)	\$200,000	0	\$0	\$19,200	54	\$1,036,800
<b>TOTAL</b>						<b>\$1,036,800</b>

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$1,036,800. 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 \$1,036,800. These are recordkeeping costs.

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

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$123,835.

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

Managerial	\$62.27 (GS-13, Step 5, \$38.92 x 1.6)
Technical	\$46.21 (GS-12, Step 1, \$28.88 x 1.6)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 x 1.6)

These rates are from the Office of Personnel Management (OPM), 2012 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 and Cost – Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999 (40 CFR Part 60, Subpart BBBB) (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 23 existing respondents (19 privately-owned, and 4 state, or local, or tribal governments) will be subject to the standards. It is estimated that no additional respondents will become subject to these standards over the next three years. The overall average number of respondents, as shown in the table below is 23 per year.

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

<b>Number of Respondents</b>					
Year	(A) Number of New Respondents	(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	0	23	0	0	23
2	0	23	0	0	23
3	0	23	0	0	23
Average	0	23	0	0	23

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 23.

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

<b>Total Annual Responses</b>				
(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=(BxC)+D
Plant Startup (Plant Control Plan, notifications, etc.)	0	5	0	0
Notifications (Performance Test, CEMS Demonstration, etc.)	0	4	0	0
Annual Reports	23	2.35	0	54.05
Semiannual Excess Emission Reports	2.3	2	0	4.6
			Total	59 (Rounded)

The number of Total Annual Responses is 59 (rounded), (49 for privately-owned MWC units and 10 for state, or local, or tribal government MWC units).

The total annual labor costs are \$9,765,779. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999 (40 CFR Part 60, Subpart BBBB) (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 hours are 100,854 at a cost of \$9,765,779. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999 (40 CFR Part 60, Subpart BBBB) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 1,709 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$1,036,800. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

#### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 2,748 labor hours at a cost of \$123,835. See below Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999 (40 CFR Part 60, Subpart BBBB) (Renewal).

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

There is no change in the industry labor hours in this ICR compared to the previous ICR. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the Emission Guidelines only affect existing sources, so there is no significant change in the overall burden. However, there is an adjustment increase in the total industry and Agency labor costs as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The change in cost estimates reflects updated labor rates available from the Bureau of Labor Statistics.

**6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 1,709 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 the EPA regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2012-0517. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2012-0517 and OMB Control Number 2060-0424 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 – Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999 (40 CFR Part 60, Subpart BBBB) (Renewal)**

Burden Item	(A) Person Hours Per Occurrence	(B) Number of Occurrences Per Respondent Per Year <sup>a</sup>	(C) Hours Per Respondent Per Year (C=AxB)	(D) Number of Respondents Per Year <sup>b</sup>	(E) Technical Hours Per Year (E=CxD)	(F) Management Hours Per Year (F=Ex0.05)	(G) Clerical Hours Per Year (G=Ex0.1)	(H) Total Costs Per Year <sup>c</sup>
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Read and Understand Rule Requirements	40	1	40	0	0	0	0	\$0
B. Required Activities								
i. Initial performance tests and reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	775	1	775	0	0	0	0	\$0
ii. CEMS demonstration (SO <sub>2</sub> , NO <sub>x</sub> , opacity, CO, CO <sub>2</sub> , O <sub>2</sub> )								
a. Installation of CEM units	225	1	225	0	0	0	0	\$0
b. Initial demonstration	450	1	450	0	0	0	0	\$0
iii. Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	775	1	775	23	17,825	891.25	1,782.5	\$1,984,914.46
iv. Quarterly Appendix F audits of CEMS (SO <sub>2</sub> , NO <sub>x</sub> , CO)								
a. RATA audit (one per year) <sup>d</sup>	350	2.3	805	23	18,515	925.75	1,851.5	\$2,061,749.86
b. RAA audit (three per year) <sup>e</sup>	130	6.9	897	23	20,631	1031.55	2,063.1	\$2,297,378.42
c. Daily calibration and operation <sup>f</sup>	1	840	840	23	19,320	966	1,932	\$2,151,391.16
C. Create Information	3B							
D. Gather Information	3E							
E. Report Preparation								
i. Plant startup								
a. Plant Control Plan	40	1	40	0	0	0	0	\$0
b. Notification of Contract Awards	4	1	4	0	0	0	0	\$0
c. Notification of on-site construction start	4	1	4	0	0	0	0	\$0
d. Notification of construction completion	4	1	4	0	0	0	0	\$0
e. Notification of final completion	4	1	4	0	0	0	0	\$0
ii. Notification of initial performance tests	4	1	4	0	0	0	0	\$0
iii. Initial compliance reports	40	1	40	0	0	0	0	\$0
iv. Notification of CEMS demonstration	4	1	4	0	0	0	0	\$0
v. Initial CEMS demonstration report	90	1	90	0	0	0	0	\$0
vi. Annual compliance reports	40	2.3	92	23	2,116	105.8	211.6	\$235,628.56



Burden Item	(A) Person Hours Per Occurrence	(B) Number of Occurrences Per Respondent Per Year <sup>a</sup>	(C) Hours Per Respondent Per Year (C=AxB)	(D) Number of Respondents Per Year <sup>b</sup>	(E) Technical Hours Per Year (E=CxD)	(F) Management Hours Per Year (F=Ex0.05)	(G) Clerical Hours Per Year (G=Ex0.1)	(H) Total Costs Per Year <sup>c</sup>
vii. Semiannual excess emission reports <sup>g</sup>	40	2	80	2.3	184	9.2	18.4	\$20,489.44
<b>Subtotal for Reporting Requirements</b>					<b>90,380</b>			<b>\$8,751,551.89</b>
4. Recordkeeping Requirements								
A. Read Instructions	3A							
B. Plan Activities	3B							
C. Implement Activities	3B							
D. Develop Record System	N/A							
E. Record information								
i. Record startups, shutdowns, and malfunctions <sup>h</sup>	4	47	188	23	4,324	216.2	432.4	\$481,501.83
ii. Records of all emission rates, computations, tests <sup>h</sup>	4	47	188	23	4,324	216.2	432.4	\$481,501.83
iii. Records of employee review of operations manual	4	1	4	23	92	4.6	9.2	\$10,244.72
iv. Record amount of sorbent used for Hg and dioxin/furan control	4	4	16	23	368	18.4	36.8	\$40,978.88
F. Personnel Training	N/A							
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>					<b>10,474</b>			<b>\$1,014,227.26</b>
<b>TOTAL LABOR BURDEN AND COST (Rounded)</b>					<b>100,854</b>			<b>\$9,765,779</b>

### Assumptions:

- <sup>a</sup> Assumes an average of 2.3 affected facilities (i.e., sources or units) per respondent [53 facilities at 23 plants;  $53/23 = 2.3$  (Rounded)].
- <sup>b</sup> No additional facilities will become subject to the standard over the next three years.
- <sup>c</sup> This ICR uses the following labor rates: \$121.44 per hour for Executive, Administrative, and Managerial labor; \$100.23 per hour for Technical labor, and \$50.51 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2012, 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.
- <sup>d</sup> Relative accuracy test audits (RATA) occur once per year for each affected facility ( $1 \times 2.3 = 2.3$ ). RATA are performed for one of the four quarterly audits. RAA tests are performed for three of the four quarterly audits. Audits of the diluent monitor (O<sub>2</sub> or CO<sub>2</sub>) are not required because tests on SO<sub>2</sub> and CO monitors will incorporate the use of the diluent monitor.
- <sup>e</sup> Relative accuracy audits (RAA) occur three times per year for each affected facility ( $3 \times 2.3 = 6.9$ ).
- <sup>f</sup> Daily calibration and operation data occurs daily [ $365 \times 2.3 = 840$  (Rounded)].
- <sup>g</sup> Assumes 10 percent of sources (2.3) have affected facilities with excess emissions and must submit two semiannual reports.
- <sup>h</sup> Assumes 47 weeks of operation (90 percent availability) per year per facility.

**Table 2. Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999 (40 CFR Part 60, Subpart BBBB) (Renewal)**

<b>Burden Item</b>	<b>(A) Number of Occurrences Per Year</b>	<b>(B) EPA person- hours per occurrence</b>	<b>(C) Tech Hours Per Year (C=AxB)</b>	<b>(D) Management Hours Per Year (D=Cx0.05)</b>	<b>(E) Clerical Hours Per Year (E=Cx0.1)</b>	<b>(F) EPA Cost Per Year<sup>a</sup></b>
1. Applications	N/A					
2. Report Reviews						
i. Review preliminary and final material separation plans and siting analysis <sup>b</sup>	0	8	0	0	0	\$0
ii. Review notification of construction <sup>b</sup>	0	2	0	0	0	\$0
iii. Review notification of startup <sup>b</sup>	0	2	0	0	0	\$0
iv. Review notification of initial performance test <sup>b</sup>	0	8	0	0	0	\$0
v. Review notification of initial CEMS demonstration <sup>b</sup>	0	4	0	0	0	\$0
vi. Review initial performance test report <sup>b</sup>	0	40	0	0	0	\$0
vii. Review initial CEMS demonstration report <sup>b</sup>	0	40	0	0	0	\$0
viii. Review annual compliance report <sup>c, d</sup>	23	92	2,116	105.8	211.6	\$109,656.20
ix. Review semi-annual excess emission report <sup>e</sup>	4.6	16	73.6	3.68	7.36	\$3,814.13
3. Prepare annual summary report	1	200	200	10	20	\$10,364.48
<b>TOTAL ANNUAL BURDEN AND COST: (Rounded)</b>				<b>2,748</b>		<b>\$123,835</b>

**Assumptions:**

<sup>a</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 Managerial rate (GS-13, Step 5, \$38.92 x 1.6), \$46.21 Technical rate (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 Clerical rate (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2012 General Schedule, which excludes locality rates of pay.

<sup>b</sup> No additional sources will become subject to the standard over the next three years.

<sup>c</sup> Assumes 53 affected units at 23 plants.

<sup>d</sup> Assumes four hours to review the annual compliance report for each plant (4 x 23 = 92).

<sup>e</sup> Assumes submission of semiannual excess emission reports will be required for 10 percent of units (2.3); (2 x 2.3 = 4.6).