SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NSPS for Small Municipal Waste Combustors (40 CFR Part 60, Subpart AAAA) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Small Municipal Waste Combustors (40 CFR Part 60, Subpart AAAA) (Renewal), EPA ICR Number 1900.05, OMB Control Number 2060-0423

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Small Municipal Waste Combustors (40 CFR Part 60, Subpart AAAA) were proposed on August 30, 1999, and promulgated on December 6, 2000. These regulations apply to new facilities with small municipal waste combustors (MWCs) that combust greater than 35 tons per day (tpd) but less than 250 tpd of municipal solid waste: small MWC units commencing construction after August 30, 1999, and small MWC units that commenced reconstruction or modification after June 6, 2001. This information is being collected to assure compliance with 40 CFR part 60, subpart AAAA.

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

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 consultations with industry representatives, there is an average of 1.6 affected facilities at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Approximately five small MWC units (i.e., 5 sources) at three plants (i.e., 3 respondents) are subject to the standards. One of the three plants is owned by state and local government, and two are owned by the private industry. It is estimated that one additional private industry respondent will become subject to the standard over the next three years.

OMB approved the currently-active ICR without any "Terms of Clearance."

The burden to the "Affected Public" may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Small Municipal Waste Combustors (40 CFR Part 60, Subpart AAAA) (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 – NSPS for Small Municipal Waste Combustors (40 CFR Part 60, Subpart AAAA) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

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

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

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

In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

> (A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, 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.

In the Administrator's judgment, organics, metals, and acid gases emissions from small MWCs cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart AAAA.

2(b) Practical Utility/Users of the Data

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

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance 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 standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the standard 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 AAAA.

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's industry experts have been consulted, and the Agency's internal data

sources and projections of industry growth over the next three years have been considered. 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 the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

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) Xcel Energy, at (800) 328-8226; and 2) the Solid Waste Association of North America (SWANA), at (240) 494-2247.

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, any pattern of non-compliance and to 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 for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed in the following table.

Standard (40 CFR Part 60, Subpart AAAA)	SIC Codes	NAICS Codes
Air & Water Resource and Solid Waste Management	9511	92411
Sold Waste Combustors & Incinerators	4953	562213

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Small Municipal Waste Combustors (40 CFR Part 60, Subpart AAAA).

A source must make the following reports:

Notifications	
Construction/reconstruction	60.7(a)(1), 60.1375
Reports due before and after notice of construction	60.1375 60.1385
Actual startup	60.7(a)(3),
Initial stack tests for all regulated pollutants and parameters	60.8(a) and (d), 60.1395, 60.1400 60.1430
Notice of construction	60.1380
Semi-annual reports	60.1415 - 60.1420, 60.1430
Annual compliance reports for all pollutants and parameters	60.1405, 60.1410, 60.1430

Notifications	
Reports for air curtain incinerators	60.1455
Demonstration of continuous monitoring system and test data	60.7(a)(5), 60.1395
Physical or operational change	60.7(a)(4)
Semiannual excess emission reports (SO2, CO, load, temperature, PM, dioxin/furan, opacity, HCl, Cd, Pb, Hg, fugitives)	60.1425
Report of continuous emission monitors (CEMs) demonstration and test data	60.1410
Prepare a material separation plan and siting analysis	60.1050, 60.1110
Schedule public meeting on siting analysis	60.1140

A source must keep the following records:

Recordkeeping	
Records of occurrence and duration of any startups, shutdowns, malfunctions, or any malfunction of CEMS	60.7(b), 60.1340, 60.1365
Records on material separation plan and siting analysis	60.1345(a) 60.1350
Records of operator training and certification	60.1340(b), 60.1355
Records of initial stack tests and annual stack tests	60.1340(c), 60.1360
Records for CEMS rates and parameters and computations of average emissions and parameters	60.1340(d), 60.1365, 60.1370
Records of MWC units that use activated carbon. Records of quarterly amount of sorbent for Hg control	60.1340(e), 60.1370
Records of results of daily CEMS drift tests and Appendix F accuracy assessments	60.1365
Records are required to be retained for 5 years. The full 5 years of records must be retained at the facility	60.1345

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

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for opacity, SO_2, NO_X, and O_2.
Perform initial performance test, Reference Method 1 and 23 for organics; Reference Methods 1 and 29 for Cd, Pb, Hg; Reference Method 9 for opacity; Reference Methods 1 and 5 for particulate matter; Reference Methods 1and 26 or 26A for acid gases; and Reference Method 22 for fugitive ash; and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

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

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis,

storage, and distribution of the required information.

Agency Activities
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 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

A majority of the respondents are small entities (i.e., small businesses). 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 some small MWC units can skip annual tests for two-year periods for certain pollutants if they have demonstrated compliance for three annual tests in a row. In addition to this reduced testing option, less frequent dioxin/furan testing is possible if all MWC 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 in below Table 1: Annual Respondent Burden and Cost – NSPS for Small Municipal Waste Combustors (40 CFR Part 60, Subpart AAAA) (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 12,351 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 standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a

facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Facility	(C) Number of New Facilities	(D) Total Capital/ Startup Cost, (B X C)	(E) Annual O&M Costs for One Facility	(F) Number of Facilities 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	0.33[a]	$66,000	$19,200	5.33[b]	$102,336
TOTAL			$66,000			$102,336

[a] We estimate that one additional facility will become subject to this subpart over the next three years. Therefore, we estimate the number of new facilities to be 0.33 per year.
[b] The estimated number of facilities with O&M costs includes the five existing facilities (at 3 plants) and the one additional facility (0.33 per year) expected to startup over the next three years.

The total capital/startup costs for this ICR are $66,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $102,336. 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 $168,336.

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 $25,882.

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

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

These rates are from the Office of Personnel Management (OPM), 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 – NSPS for Small Municipal Waste Combustors (40 CFR Part 60, Subpart AAAA) (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 3 existing respondents will be subject to the standard. It is estimated that an additional 0.33 respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 3.33 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents [1]	(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	0.33	3	0	0	3.33
2	0.33	3	0	0	3.33
3	0.33	3	0	0	3.33
Average	0.33	3	0	0	3.33

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 3.33.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do	(E) Total Annual Responses E=(BxC)+D

Total Annual Responses				
			Not Submit Reports	
Plant Startup (Waste Separation Plan, Notifications, etc.)	0.33 [a]	4	0	1.32
Notifications (Performance Test, CEMS Demonstration, etc.)	0.33 [a]	4	0	1.32
Annual Reports	3.33 [b]	1.60	0	5.33
Semiannual Excess Emission Reports	1 [c]	2	0	2
Total (rounded)				**10**

[a] New respondents include sources with constructed, reconstructed and modified affected facilities.

[b] There is an average of 1.60 affected facility (i.e. sources or units) per respondent (i.e. plant). (5.33 facilities) / (3.33 plants) = (1.60 facilities/plant).

[c] This ICR assumes a total of two excess emissions report per year from all affected facilities.

The number of Total Annual Responses is 10.

The total annual labor costs are $1,195,891. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Small Municipal Waste Combustors (40 CFR Part 60, Subpart AAAA) (Renewal).

6(e) Bottom Line 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 12,351 hours at a cost of $1,195,891. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Small Municipal Waste Combustors (40 CFR Part 60, Subpart AAAA) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 1,235 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $168,336. 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 574 labor hours at a cost of $25,882. See below Table 2: Average Annual EPA Burden and Cost –

NSPS for Small Municipal Waste Combustors (40 CFR Part 60, Subpart AAAA) (Renewal).

6(f) Reasons for Change in Burden

There is an increase in burden hours for the respondents from the most recently approved ICR due to an increase of one new source subject to the regulation (i.e. respondent universe). The growth in respondent universe also results in an increase in the respondent labor costs and O&M costs.

Additionally, there is an increase in burden costs for the Agency from the most recently approved ICR due to an adjustment in labor rates. This ICR uses updated labor rates from the Bureau of Labor Statistics to calculate all burden costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 1,235 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2012-0506. 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) 566-1527. 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-2012-0506 and OMB Control Number 2060-0423 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NSPS for Small Municipal Waste Combustors (40 CFR Part 60, Subpart AAAA) (Renewal)

Burden Item	(A) Respondent Hours Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Person Hours Per Respondent Per Year (AxB)	(D) Number of Respondents Per Year [a]	(E) Technical Hours Per Year (CxD)	(F) Management Hours Per Year (Ex0.05)	(G) Clerical Hours Per Year (Ex0.1)	(H) Total Cost Per Year, $ [b]
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements for Private Sources								
A. Read and Understand Rule Requirements	40	1	40	0.33	13.2	0.66	1.32	$1,469.86
B. Required Activities								
1) Initial performance tests and reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	775	1	775	0.33	255.75	12.79	25.58	$28,478.53
2) CEMS demonstration (SO2, NOx, opacity, CO, CO2, O2)								
a) Installation of CEM units	225	1	225	0.33	74.25	3.71	7.43	$8,267.96
b) Initial demonstration	450	1	450	0.33	148.5	7.43	14.85	$16,535.92
3) Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	775	1	775	2.33	1,805.75	90.29	180.58	$201,075.68
4) Quarterly Appendix F audits of CEMS (SO2, NOx, CO)								
a) RATA audit (one per year) [c, d, g]	350	1.60	560.21	2.33	1,305.29	65.26	130.53	$145,347.93
b) RAA audit (three per year) [e, g]	130	4.80	624.23	2.33	1,454.47	72.72	145.45	$161,959.13
c) Daily calibration and operation [f]	1	584.22	584.22	2.33	1,361.23	68.06	136.12	$151,577.13
C. Create Information	See 3B							
D. Gather Information	See 3E							
E. Report Preparation								
1) Plant startup								
a) Preliminary and final material separation plans and siting analysis	270	1	270	0.33	89.1	4.46	8.91	$9,921.55
b) Public meeting and comment response	140	1	140	0.33	46.2	2.31	4.62	$5,144.51
c) Notification of construction	2	1	2	0.33	0.66	0.03	0.07	$73.49
d) Notification of startup	2	1	2	0.33	0.66	0.03	0.07	$73.49

2) Notification of initial performance tests	4	1	4	0.33	1.32	0.07	0.13	$146.99
3) Initial compliance reports	40	1	40	0.33	13.2	0.66	1.32	$1,469.86
4) Notification of CEMS demonstration	4	1	4	0.33	1.32	0.07	0.13	$146.99
5) Initial CEMS demonstration report	40	1	40	0.33	13.2	0.66	1.32	$1,469.86
6) Annual compliance reports [c]	40	1.60	64.02	2.33	149.18	7.46	14.92	$16,611.19
7) Semi-annual excess emission reports [i]	40	2	80	0.50	40	2	4	$4,454.12
Subtotal Reporting Requirements (Private Sources)					**7,789.3**			**$754,224.19**
3. Reporting Requirements for State/Local Government Sources								
A. Read and Understand Rule Requirements	40	1	40	0	0	0	0	$0
B. Required Activities								
1) Initial performance tests and reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	775	1	775	0	0	0	0	$0
2) CEMS demonstration (SO2, NOx, opacity, CO, CO2, O2)								
a) Installation of CEM units	225	1	225	0	0	0	0	$0
b) Initial demonstration	450	1	450	0	0	0	0	$0
3) Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	775	1	775	1	775	38.75	77.5	$86,298.58
4) Quarterly Appendix F audits of CEMS (SO2, NOx, CO)								
a) RATA audit (one per year) [c, d, g]	350	1.60	560.21	1	560.21	28.01	56.02	$62,381.09
b) RAA audit (three per year) [e, g]	130	4.80	624.23	1	624.23	31.21	62.42	$69,510.35
c) Daily calibration and operation [f]	1	584.22	584.22	1	584.22	29.21	58.42	$65,054.56
C. Create Information	See 3B							
D. Gather Information	See 3E							
E. Report Preparation								
1) Plant startup								
a) Preliminary and final material separation plans and siting analysis	270	1	270	0	0	0	0	$0
b) Public meeting and comment response	140	1	140	0	0	0	0	$0
c) Notification of construction	2	1	2	0	0	0	0	$0
d) Notification of startup	2	1	2	0	0	0	0	$0
2) Notification of initial performance tests	4	1	4	0	0	0	0	$0
3) Initial compliance reports	40	1	40	0	0	0	0	$0

4) Notification of CEMS demonstration	4	1	4	0	0	0	0	$0
5) Initial CEMS demonstration report	40	1	40	0	0	0	0	$0
6) Annual compliance reports [c]	40	1.60	64.02	1	64.02	3.20	6.40	$7,129.27
7) Semi-annual excess emission reports [i]	40	2	80	0.5	40	2	4	$4,454.12
Subtotal Reporting Requirements (State/Local Government Sources)					**3,044.82**			**$294,827.97**
Total Reporting Requirements for Private and State/Local Government Sources					**10,834.12**			**$1,049,052.16**
4. Recordkeeping Requirements for Private Sources								
A. Read Instructions	See 3A							
B. Plan Activities	See 3B							
C. Implement Activities	See 3B							
D. Develop Record System	N/A							
E. Record information								
1) Record startups, shutdowns, and malfunctions [h]	4	47	188	2.33	438.04	21.90	43.80	$48,777.07
2) Records of all emission rates, computations, tests [h]	4	47	188	2.33	438.04	21.90	43.80	$48,777.07
3) Records of employee review of operations manual	4	1	4	2.33	9.32	0.47	0.93	$1,037.81
4) Record amount of sorbent used for Hg and dioxin/furan control	4	4	16	2.33	37.28	1.86	3.73	$4,151.24
F. Personnel Training	N/A							
G. Time for audits	N/A							
Subtotal Recordkeeping Requirements (Private Sources)					**1,061.07**			**$102,743.19**
4. Recordkeeping Requirements for State/Local Government Sources								
A. Read Instructions	See 3A							
B. Plan Activities	See 3B							
C. Implement Activities	See 3B							
D. Develop Record System	N/A							
E. Record information								
1) Record startups, shutdowns, and malfunctions [h]	4	47	188	1	188	9.4	18.8	$20,934.36
2) Records of all emission rates, computations, tests [h]	4	47	188	1	188	9.4	18.8	$20,934.36
3) Records of employee review of operations manual	4	1	4	1	4	0.2	0.4	$445.41
4) Record amount of sorbent used for Hg and dioxin/furan control	4	4	16	1	16	0.8	1.6	$1,781.65
F. Personnel Training	N/A							
G. Time for audits	N/A							

Subtotal Recordkeeping Requirements (State/Local Government Sources)					**455.4**	**$44,095.79**
Total Recordkeeping Requirements for Private and State/Local Government Sources					**1,516.47**	**$146,838.98**
TOTAL LABOR BURDEN AND COST (rounded)					**12,351**	**$1,195,891**

ASSUMPTIONS

[a] We have assumed that the average number of respondents that will be subject to the rule will be 3.33. There will be one additional new private source that will become subject to the rule over the three-year period of this ICR.

[b] 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% to account for the benefit packages available to those employed by private industry.

[c] There are an average of 1.86 affected facilities (i.e., sources or units) per respondent [5.33 facilities at 3.33 plants = 1.60 (Rounded)].

[d] Relative accuracy test audits (RATA) occur once per year for each affected facility (1 x 1.60 = 1.60).

[e] Relative accuracy audits (RAA) occur three times per year for each affected facility (3 x 1.60 = 4.80).

[f] Daily calibration and operation data occurs daily (365 x 1.60 = 584.22).

[g] RATA audits 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_2 or CO_2) are not required because tests on SO_2 and CO monitors will incorporate the use of the diluent monitor.

[h] Assumes 47 weeks of operation (90 percent availability) per year per facility.

[i] Assumes a total of 2 semiannual excess emission reports (1 report for a privately-owned source and 1 report for a state/local government-owned source).

Table 2: Average Annual EPA Burden and Cost – NSPS for Small Municipal Waste Combustors (40 CFR Part 60, Subpart AAAA) (Renewal)

Burden Item	(A) EPA Hours Per Occurrence	(B) Number of Occurrences Per Year	(C) EPA Person Hours Per Year (AxB)	(D) Respondents Per Year [a]	(E) Tech Hours Per Year (CxD)	(F) Management Hours Per Year (D=Cx0.05)	(G) Clerical Hours Per Year (E=Cx0.1)	(H) EPA Cost Per Year,$ [b]
1. Applications	N/A							
2. Read and Understand Rule Requirements	40	0	0	0	0	0	0	$0
A. Create Information	0	0	0	0	0	0	0	$0
B. Gather Information	0	0	0	0	0	0	0	$0
C. Report Reviews								
1) Review preliminary and final material separation plans and siting analysis	8	1	8	0.33	2.64	0.13	0.26	$136.82
2) Review notification of construction	2	1	2	0.33	0.66	0.03	0.07	$34.20
3) Review notification of startup	2	1	2	0.33	0.66	0.03	0.07	$34.20
4) Review notification of initial performance test	8	1	8	0.33	2.64	0.13	0.26	$136.82
5) Review notification of initial CEMS demonstration	4	1	4	0.33	1.32	0.07	0.13	$68.41
6) Review initial performance test report	40	1	40	0.33	13.2	0.66	1.32	$684.08
7) Review initial CEMS demonstration report	40	1	40	0.33	13.2	0.66	1.32	$684.08
8) Review annual compliance report	70	1	70	3.33	233.1	11.66	23.31	$12,080.29
9) Review semi-annual excess emission report [c]	16	2	32	1	32	1.6	3.2	$1,658.38
D. Prepare annual summary report	200	1	200	1	200	10	20	$10,364.90
TOTAL ANNUAL BURDEN AND COST (rounded)					**574**			**$25,882**

ASSUMPTIONS

[a] We have assumed that the average number of respondents that will be subject to the rule will be 3.33. There will be one additional new private source that will become subject to the rule over the three-year period of this ICR.

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of $62.27 (GS-13, Step 5, $38.92 x 1.6), Technical rate of $46.21 (GS-12, Step 1, $28.88 x 1.6), and Clerical rate of $25.01 (GS-6, Step 3, $15.63 x 1.6). These rates are from the Office of Personnel Management (OPM), "2011 General Schedule" which excludes locality rates of pay.

[c] Assumes a total of 2 excess emissions reports from all affected facilities.