

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb)

1. Identification of the Information Collection

1(a) Title of the Information Collection

Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (Renewal), EPA ICR Number 1847.06, OMB Control Number 2060-0390.

1(b) Short Characterization/Abstract

The Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 were proposed on September 20, 1994, promulgated on December 19, 1995, and amended on August 25, 1997, and May 10, 2006. These regulations apply to existing facilities that own and operate municipal waste combustion (MWC) units with a combustion capacity greater than 250 tons per day of municipal solid waste (large MWC units). The reporting and recordkeeping requirements discussed below result from the emission guidelines that apply to large MWCs covered by EPA-approved and effective State plans and, where a State plan has not been approved, large MWCs covered by the Federal plan. This information is being collected to assure compliance with 40 CFR part 60, subpart Cb.

In general, emission guidelines 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 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.

There is an overall total of 81 respondents. Approximately 162 large MWC units located at 63 MWC plants (respondents) in 22 States are subject to the emission guidelines through either State or the Federal plans. Of the 63 large MWC plants, 55 are located in states with State plans and eight are located in states without State plans and are thus subject to the Federal plan. Currently, 49 percent of large MWC plants are privately-owned. The remaining 51 percent are owned by state and local governments. Since the Emission Guidelines only apply to sources that commenced construction on or before September 20, 1994, 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):

When this ICR is renewed, EPA should review the respondent burden, universe, response number, labor rates, and capital costs and ensure these estimates have been updated.

To address the TOC, EPA has updated the respondent burden, universe, number of responses, labor rates, and capital costs based on the most recent available information and consultation with industry.

The “Affected Public” includes MWC units that are owned by the private sector, MWC units that are owned by state and local government, as well as State Administrators. The burden to the “Affected Public” may be found below in Table 1a: Annual Privately-Owned Respondent Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (Renewal), and in Table 1b: Annual Publicly Owned Respondent Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (Renewal). The burden to the “Designated State Administrator” is attributed entirely to work performed by either the state, or local, or tribal air pollution authority employees or government contractors and may be found below in Table 1c: Average Annual Designated Administrator Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by other Federal employees or by government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (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;

Section 129 of the CAA directs that the emissions guidelines for MWCs must include emissions limits for particulate matter, opacity, sulfur dioxide, hydrogen chloride, oxides of nitrogen, carbon monoxide, lead, cadmium, mercury, and dioxins and dibenzofurans. The 40 CFR part 60, subpart Cb emission guidelines address all of these pollutants.

2(b) Practical Utility/Users of the Data

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

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance 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 Cb.

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. 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 and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. 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. In this case, no comments were received.

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 with 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 large 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.

Standard (40 CFR Part 60, Subpart Cb)	SIC Codes	NAICS Codes
Air and Water Resource and Solid Waste Management	9511	92411
Refuse System; Solid Waste Combustors and	4953	562213

Incinerators		
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4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb).

A source must make the following reports:

Notifications	
Notification of completion of each increment of progress, including final control plan	62.14108; 62.14109(e), (f), (g), (h), (m)
Notification of exemptions, including alternatives, limitations, cease operations, and de-rating requests	60.32b(b), 62.14102(c), (d)-(f), (i), (j), (l); 62.14108(b)(4); 62.14109(j)-(l); 60.59(b)(l)
Notification of initial performance tests (PM, dioxin/furan, opacity, HCl, Cd, Pb, Hg, fugitives)	60.8(d)

Reports	
Report initial performance tests for all regulated pollutants and parameters	60.59b(f), 62.14109(c)
Report of Continuous Emissions Monitoring System (CEMS) demonstration and test data	60.59b(f)(3), 62.14109(a)
Annual compliance reports for all pollutants and parameters	60.59b(g)
Develop and update annually site-specific operating manual	62.14105(e)
Training records	62.14105(g)
Semiannual excess emission reports (SO ₂ , CO, load, temperature, PM, dioxin/furan, opacity, HCl, Cd, Pb, Hg, fugitives)	60.59b(h)

A source must keep the following records:

Recordkeeping	
Records of CEMS concentration rates and parameters and computations of average emissions and parameters	60.59b(d), (m); 62.14109(a)
Records of initial performance tests and annual performance tests, including final control plan	60.59b(d)-(e); 62.14109(a), (i)
Records of results of daily CEMS drift tests and Appendix F accuracy assessments	60.59b(d)(8), 62.14109(a)
Records of the occurrence and duration of any startup,	60.59b(d), (n), (o)

Recordkeeping	
shutdown, or malfunction of the facility or any malfunction of the CEM	
Records of quarterly amount of sorbent used for Hg control.	60.59b(d), 62.14109(a)
Records of names of persons who have completed review of operating manual	60.59b(d)(13), 62.14105(g), 62.14109(a)
Records are required to be retained for 5 years at the facility	60.59b(d)-(f), (j)-(k); 62.14109(a)

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 continuous emissions monitoring systems for sulfur dioxide, nitrogen oxides, opacity, carbon monoxide, load level, temperature of the fuel gas stream, and oxygen or carbon dioxide.
Perform initial performance test, applicable Reference Method test, 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.
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 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

There are no small entities (i.e., small businesses) affected by this regulation.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1a: Annual Privately Owned Respondent Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (Renewal), and Table 1b: Annual Publicly Owned Respondent Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (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 394,965 hours. By individual category, there are: 1) 190,927 hours for privately owned MWCs (Total Labor Hours from Table 1a below); 2) 201,002 hours for publicly owned MWCs (Total Labor Hours from Table 1b below); and 3) 3,036 hours for designated State plan administrators (Total Labor Hours from Table 1c below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the Emission Guidelines, 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.

Additionally, this ICR assumes a contractor rate of \$168.60. The contractor rate was

derived by taking the contractor rate in the previous ICR and multiplying by the average increase in managerial, technical, and clerical rates since the previous ICR. The result is a five percent increase in contractor rate since the last ICR. The labor rates for publicly-owned sources and State administrators are detailed in Section 6(c).

(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 monitor and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents ¹	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M ²	(G) Total O&M, (E X F)
Private sector- Load monitors, temperature monitors, and carbon feed rate monitors.	\$100,000	0	\$0	\$9,600	80	\$768,000
Public sector -Load monitors, temperature monitors, and carbon feed rate monitors.	\$100,000	0	\$0	\$9,600	82	\$787,200
Total	\$100,000	0	\$0	\$9,600	162	\$1,555,200

¹ Since the Emission Guidelines only apply to sources that commenced construction on or before September 20, 1994, no additional MWC units will become subject to the standard over the next three years.

² Approximately 162 sources located at 63 plants are currently subject to the Emissions Guidelines and each source requires continuous monitoring. Of the 162 sources, 80 sources are within the private sector and 82 sources are publicly-owned.

There are no capital/startup costs for this ICR.

The total operation and maintenance (O&M) costs for this ICR are \$1,555,200. 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 \$1,555,200. 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 \$19,924.

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 – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (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 81 existing respondents will be subject to the standard. It is estimated that no additional respondents will become subject. The overall average number of respondents, as shown in the table below is 81 per year.

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

Number of Respondents					
Year	(A) Number of New Respondents	(B) Number of Existing Respondents ¹	(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	81	0	0	81
2	0	81	0	0	81
3	0	81	0	0	81
Average	0	81	0	0	81

¹An average of 63 large MWC plants (respondents) will be subject to the standards over the next three years. Approximately 31 respondents are privately-owned and 32 respondents are publicly-owned. Additionally, it is estimated there will be 18 State Designated Administrators. Total number of respondents = (63 + 18) = 81.

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 81.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Privately owned large MWCs				
Increments of Progress (Plant Control Plan, notifications, etc.)	0	3	0	0
Initial Testing Notifications and Reports (Performance Test, CEMS Demonstration, etc.)	0	4	0	0
Annual Performance Tests and Reports	31	1	0	31
Annual Compliance Reports	31	1	0	31
Semiannual Excess Emission Reports	6	2	0	12
			Total	74
Publicly owned large MWCs				
Increments of Progress (Plant Control Plan, notifications, etc.)	0	3	0	0
Initial Testing Notifications and Reports (Performance Test, CEMS Demonstration, etc.)	0	4	0	0
Annual Performance Tests and Reports	32	1	0	32
Annual Compliance Reports	32	1	0	32
Semiannual Excess Emission Reports	7	2	0	14
			Total	78
Designated State Plan Administrators				
Excess Emissions – Enforcement Activities	11	1	0	11
Review Annual Compliance Report	55	1	0	55
Review Semiannual Excess Emissions Report	11	1	0	11
			Total	77

The combined total of Annual Responses is 229. These individual totals are as follows: 1) 74 for privately owned MWCs; 2) 78 for publicly owned MWCs; and 3) 77 for designated State plan administrators.

The total, annual labor costs for privately-owned MWCs are \$26,765,467. Details regarding these estimates may be found below in Table 1a: Annual Privately-Owned Respondent Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (Renewal).

The total, annual labor costs for publicly-owned MWCs are \$24,302,360. Details regarding these estimates may be found below in Table 1b: Annual Publicly-Owned Respondent Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (Renewal).

The total annual labor costs for designated State plan administrators are \$136,975.

Details regarding these estimates may be found below in Table 1c: Average Annual Designated-Administrator Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (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 1a, 1b, 1c, and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours for privately owned MWCs are 190,927 hours at a cost of \$26,765,467. Details regarding these estimates may be found below in Table 1a: Annual Privately Owned Respondent Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (Renewal).

The total annual labor hours for publicly owned MWCs are 201,002 at a cost of \$24,302,360. Details regarding these estimates may be found below in Table 1b: Annual Publicly Owned Respondent Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (Renewal).

The total, annual labor hours for designated State administrator respondents are 3,036 hours at a cost of \$136,975. Details regarding these estimates may be found below in Table 1c: Average Annual Designated Administrator Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (Renewal).

Furthermore, the annual reporting and recordkeeping burden for this collection of information is estimated to average 1,725 (rounded) hours per response (394,965 total burden hours/229 annual responses).

The total annual capital/startup and O&M costs to the regulated entity are \$1,555,200. 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 442 labor hours at a cost of \$19,924. See below Table 2: Average Annual EPA Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (Renewal).

6(f) Reasons for Change in Burden

There is a small decrease in labor hours for privately owned respondents and an increase in labor hours for publicly owned respondents from the most recent ICR. The changes in labor hours are due to rounding in the number of respondents that are subject to semi-annual excess emissions reporting. This ICR uses rounded value for the number of respondents in calculating labor hours and costs. Additionally, there is an increase of one labor hour for the Agency due to correction of rounding error from the previous ICR.

There is also an increase in labor costs for both the respondents and the Agency. 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 1,725 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-2012-0503. 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-2012-0503 and OMB Control Number 2060-0390 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 1a: Annual Privately-Owned Respondent Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (Renewal)

Burden Item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)
	Respondent Person Hours Per Occurrence	Contractor Person Hours Per Occurrence	Number of Occurrences Per Respondent Per Year	Hours Per Respondent Per Year (D = A x C)	Number of Respondents Per Year (a)	Technical Hours Per Year (D x E)	Management Hours Per Year (F x 0.05)	Clerical Hours Per Year (F x 0.1)	Contractor Hours Per Year (B x C x E)	Total Costs Per Year (b)
1. Applications	N/A									
2. Surveys and studies	N/A									
3. Reporting Requirements										
A. Read and understand rule requirements	40	0	1	40	0	0	0	0	0	\$0
B. Required activities										
1) Initial performance tests and reports										
a) Initial performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	24	750	1	24	0	0	0	0	0	\$0
b) Repeat of Initial performance tests ^c	24	750	1	24	0	0	0	0	0	\$0
2) CEMS demonstration (SO ₂ , NO _x , opacity, CO, CO ₂ , O ₂)										
a) Installation of CEM units	24	200	1	24	0	0	0	0	0	\$0
b) Initial demonstration	24	430	1	24	0	0	0	0	0	\$0
c) Repeat of initial demonstration ^c	24	430	1	24	0	0	0	0	0	\$0
3) Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)										
a) Plants that do not qualify for reduced D/F testing with 2 units	24	1,500	1	24	1	24	1	2	1,500	\$255,572.47
b) Plants that do not qualify for reduced D/F testing with 3 units	24	2,250	1	24	2	48	2	5	4,500	\$764,044.94
c) Plants that qualify for reduced D/F testing with 2 units	24	1,428	1	24	13	312	16	31	18,564	\$3,164,632.54
d) Plants that qualify for reduced D/F testing with 3 units	24	2,106	1	24	15	360	18	36	31,590	\$5,366,161.08
4) Quarterly Appendix F audits of CEMS (SO ₂ , NO _x , CO)										
a) RATA audit (one per year) ^d	8	350	1	8	80	640	32	64	28,000	\$4,792,065.92
b) RAA audit (three per year) ^d	8	130	3	24	80	1,920	96	192	31,200	\$5,474,117.76
c) Daily calibration and operation	1	0	365	365	80	29,200	1,460	2,920	0	\$3,251,507.60
C. Create Information	See 3B									
D. Gather Information	See 3E									
E. Report Preparation										
1) Plant startup										
a) Control plan	40	0	1	40	0	0	0	0	0	\$0
b) Notification of contract awards	4	0	1	4	0	0	0	0	0	\$0
c) Notification of on-site construction start	4	0	1	4	0	0	0	0	0	\$0
d) Notification of construction completion	4	0	1	4	0	0	0	0	0	\$0
e) Notification of final compliance	4	0	1	4	0	0	0	0	0	\$0
2) Notification of initial performance tests	4	0	1	4	0	0	0	0	0	\$0
3) Initial compliance reports	40	0	1	40	0	0	0	0	0	\$0
4) Notification of CEMS demonstration	4	0	1	4	0	0	0	0	0	\$0
5) Initial CEMS demonstration report	90	0	1	90	0	0	0	0	0	\$0
6) Annual compliance reports	40	0	1	40	31	1,240	62	124	0	\$138,077.72
7) Semi-annual excess emission reports ^e	40	0	2	80	6	480	24	48	0	\$53,449.44
Subtotal for Reporting								154,711		\$23,259,629

4. Recordkeeping Requirements											
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 ^f	4	0	47	188	80	15,040	752	1,504	0	\$1,674,749.12	
2) Records of all emission rates, computations, tests ^f	4	0	47	188	80	15,040	752	1,504	0	\$1,674,749.12	
3) Records of employee review of operations manual	4	0	1	4	31	124	6	12	0	\$13,807.77	
4) Record amount of sorbent used for Hg and dioxin/furan control ^g	4	0	4	16	80	1,290	64	128	0	\$142,531.84	
F. Personnel training	N/A										
G. Time for audits	N/A										
Subtotal for Recordkeeping							36,216			\$3,505,838	
TOTAL LABOR BURDEN AND COST (Rounded)							190,927			\$26,765,467	

Assumptions:

- a. Assume 162 large MWC units at 63 plants, 49 percent of which are privately owned.
- 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 percent to account for the benefit packages available to those employed by private industry. The contractor rate was derived by taking the contractor rate used in the previous ICR and multiplying by the average increase in managerial, technical, and clerical rates since the previous ICR.
- c. Assume 20 percent of reporting plants must repeat initial tests due to failure at one unit at the plant.
- d. 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 (O₂ or CO₂) are not required because tests on SO₂ and CO monitors will incorporate the use of the diluent monitor.
- e. Assume 20 percent of affected plants must submit two semiannual reports per year due to exceeding one or more pollutant emission limits.
- f. Based on weekly recordkeeping, we assume 47 weeks of operation (90 percent availability) per year per MWC.
- g. Based on quarterly calculation of sorbent use for entire plant, regardless of the number of affected facilities at the plant.

Table 1b: Annual Publicly-Owned Respondent Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (Renewal)

Burden Item	(A) Respondent Person Hours Per Occurrence	(B) Contractor Person Hours Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Hours Per Respondent Per Year (D = A x C)	(E) Number of Respondents Per Year (a)	(F) Technical Hours Per Year (D x E)	(G) Management Hours Per Year (F x 0.05)	(H) Clerical Hours Per Year (F x 0.1)	(I) Contractor Hours Per Year (C x D x E)	(J) Total Costs Per Year (b)
1. Applications	N/A									
2. Surveys and studies	N/A									
3. Reporting Requirements										
A Read and understand rule requirements	40	0	1	40	0	0	0	0	0	\$0
B. Required Activities										
1) Initial performance tests and reports										
a) Initial performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	24	750	1	24	0	0	0	0	0	\$0
b) Repeat of Initial performance tests ^c	24	750	1	24	0	0	0	0	0	\$0
2) CEMS demonstration (SO ₂ , NO _x , opacity, CO, CO ₂ , O ₂)										
a) Installation of CEM units	24	200	1	24	0	0	0	0	0	\$0
b) Initial demonstration	24	430	1	24	0	0	0	0	0	\$0
c) Repeat of initial demonstration ^c	24	430	1	24	0	0	0	0	0	\$0
3) Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)										
a) Plants that do not qualify for reduced D/F testing with 2 units	24	1,500	1	24	3	72	4	7	4,500	\$762,435.68
b) Plants that do not qualify for reduced D/F testing with 3 units	24	2,250	1	24	2	48	2	5	4,500	\$761,190.46
c) Plants that qualify for reduced D/F testing with 2 units	24	1,428	1	24	14	336	17	34	19,992	\$3,388,084.39
d) Plants that qualify for reduced D/F testing with 3 units	24	2,106	1	24	16	384	19	38	33,696	\$5,701,069.25
4) Quarterly Appendix F audits of CEMS (SO ₂ , NO _x , CO)										
a) RATA audit (one per year) ^d	8	350	1	8	82	656	33	66	28,700	\$4,872,856.23
b) RAA audit (three per year) ^d	8	130	3	24	82	1,968	98	197	31,980	\$5,493,936.70
c) Daily calibration and operation	1	0	365	365	82	29,930	1,497	2,993	0	\$1,552,903.09
C. Create Information	See 3B									
D Gather Information	See 3E									
E. Report Preparation										
1) Plant startup										
a) Control plan	40	0	1	40	0	0	0	0	0	\$0
b) Notification of contract awards	4	0	1	4	0	0	0	0	0	\$0
c) Notification of on-site construction start	4	0	1	4	0	0	0	0	0	\$0
d) Notification of construction completion	4	0	1	4	0	0	0	0	0	\$0
e) Notification of final compliance	4	0	1	4	0	0	0	0	0	\$0

2) Notification of initial performance tests	4	0	1	4	0	0	0	0	0	\$0
3) Initial compliance reports	40	0	1	40	0	0	0	0	0	\$0
4) Notification of CEMS demonstration	4	0	1	4	0	0	0	0	0	\$0
5) Initial CEMS demonstration report	90	0	1	90	0	0	0	0	0	\$0
6) Annual compliance reports	40	0	1	40	32	1,280	64	128	0	\$66,412.16
7) Semi-annual excess emission reports ^e	40	0	2	80	7	560	28	56	0	\$29,055.32
Subtotal for Reporting							163,888			\$22,627,943
⁴ Recordkeeping Requirements										
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 ^f	4	0	47	188	82	15,416	771	1,542	0	\$799,851.45
2) Records of all emission rates, computations, tests ^f	4	0	47	188	82	15,416	771	1,542	0	\$799,851.45
3) Records of employee review of operations manual	4	0	1	4	32	128	6	13	0	\$6,641.22
4) Record amount of sorbent used for Hg and dioxin/furan control ^g	4	0	4	16	82	1,312	66	131	0	\$68,072.46
F. Personnel Training	N/A									
G. Time for audits	N/A									
Subtotal for Recordkeeping							37,114			\$1,674,417
TOTAL LABOR BURDEN AND COST (Rounded)							201,002			\$24,302,360

Assumptions:

- a. Assume 162 large MWC units at 63 plants, 49 percent of which are privately owned.
- 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 percent to account for the benefit packages available to those employed by private industry. The contractor rate was derived by taking the contractor rate used in the previous ICR and multiplying by the average increase in managerial, technical, and clerical rates since the previous ICR.
- c. Assume 20 percent of reporting plants must repeat initial tests due to failure at one unit at the plant.
- d. 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 (O₂ or CO₂) are not required because tests on SO₂ and CO monitors will incorporate the use of the diluent monitor.
- e. Assume 20 percent of affected plants must submit two semiannual reports per year due to exceeding one or more pollutant emission limits.
- f. Based on weekly recordkeeping, we assume 47 weeks of operation (90 percent availability) per year per MWC.
- g. Based on quarterly calculation of sorbent use for entire plant, regardless of the number of affected facilities at the plant.
- h. Includes both respondent and contractor hours.

Table 1c: Average Annual Designated Administrator Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR Part 60, Subpart Cb) (Renewal)

Burden Item	(A) Number of Occurrences Per Year (a)	(B) Administrator Hours Per Occurrence	(C) Tech Hours Per Year (C=AxB)	(D) Management Hours Per Year (D=Cx0.05)	(E) Clerical Hours Per Year (E=Cx0.1)	(F) Administrator Cost Per Year (b)
1. Applications	N/A					
2. Read and understand rule requirements	0	40	0	0	0	\$0
3. Required Activities						
A. Observe initial performance tests						
1) Initial performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl Cd, Pb, Hg) ^c	0	48	0	0	0	\$0
2) Repeat of initial performance tests ^d	0	10	0	0	0	\$0
B. Excess emissions -- enforcement activities ^f	11	24	264	13	26	\$13,697.51
C. Create Information						
D. Gather Information						
E. Report Reviews						
1) Control plan	0	8	0	0	0	\$0
2) Notification of contract awards	0	8	0	0	0	\$0
3) Notification of on-site construction start	0	8	0	0	0	\$0
4) Notification of construction completion	0	8	0	0	0	\$0
5) Notification of final compliance	0	8	0	0	0	\$0
6) Review notification of initial performance test	0	8	0	0	0	\$0
7) Review notification of initial CEMS demonstration	0	4	0	0	0	\$0
8) Review initial performance test report	0	40	0	0	0	\$0
9) Review initial CEMS demonstration report	0	40	0	0	0	\$0
10) Review annual compliance report ^e	55	40	2,200	110	220	\$114,145.90
11) Review semi-annual excess emission report ^f	11	16	176	9	18	\$9,131.67
F. Prepare annual summary report	0	200	0	0	0	\$0
TOTAL ANNUAL BURDEN AND COST: (rounded)				3,036		\$136,975

Assumptions:

- a. Assume 144 affected units as 55 plants in 18 states.
- b. 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)
- c. Assume EPA personnel attend about 8 percent of tests (145 units tested x 8 percent attended =12)
- d. Assume a 20 percent failure rate and that EPA personnel attend 10 percent of the retests (7 units tested *20 percent failure* 10 percent retests attended = 1).
- e. Burden not incurred until second year of operation and later.
- f. Assume 20 percent of affected plants must submit two semiannual reports per year due to exceeding one or more pollutant emission limits.

Table 2: Average Annual EPA Burden and Cost – Emission Guidelines for Large Municipal Waste Combustors Constructed on or Before September 20, 1994 (40 CFR

Part 60, Subpart Cb) (Renewal)

Burden Item	(A) Number of Occurrences Per Year (a)	(B) Administrator Hours Per Occurrence	(C) Tech Hours Per Year (C=AxB)	(D) Management Hours Per Year (D=Cx0.05)	(E) Clerical Hours Per Year (E=Cx0.1)	(F) Administrator Cost Per Year (b)
¹ Applications	not applicable					
² Read and Understand Rule Requirements	0	40	0	0	0	\$0
³ Required Activities						
A. Observe initial performance tests						
1) Initial performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg) ^c	0	48	0	0	0	\$0
2) Repeat of Initial performance tests ^d	0	10	0	0	0	\$0
B. Excess emissions -- Enforcement Activities ^f	1.6	24	38	2	4	\$1,992.36
C. Create Information						
D. Gather Information						
E. Report Reviews						
1) Control plan	0	8	0	0	0	\$0
2) Notification of contract awards	0	8	0	0	0	\$0
3) Notification of on-site construction start	0	8	0	0	0	\$0
4) Notification of construction completion	0	8	0	0	0	\$0
5) Notification of final compliance	0	8	0	0	0	\$0
6) Review notification of initial performance test	0	8	0	0	0	\$0
7) Review notification of initial CEMS demonstration	0	4	0	0	0	\$0
8) Review initial performance test report	0	40	0	0	0	\$0
9) Review initial CEMS demonstration report	0	40	0	0	0	\$0
10) Review annual compliance report ^e	8	40	320	16	32	\$16,603.04
11) Review semi-annual excess emission report ^f	1.6	16	26	1	3	\$1,328.24
F. Prepare annual summary report	0	200	0	0	0	\$0
TOTAL ANNUAL BURDEN AND COST: (Rounded)				442		\$19,924

Assumptions:

- Assumes 18 affected units at 8 plants in 4 states.
- The 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.
- Assume EPA personnel attend about 8 percent of tests (22 units tested x 8 percent attended = 2).
- Assume a 20 percent failure rate and that EPA personnel attend 10 percent of the retests (7 units tested *20 percent failure* 10 percent retests attended = 1)
- Burden not incurred until second year of operation and later.
- Assumes 20 percent of affected plants must submit two semiannual reports per year due to exceeding one or more pollutant emission limits.