**SUPPORTING STATEMENT**

**ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal)**

**1. Identification of the Information Collection**

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

NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal), EPA ICR Number 1053.11, OMB Control Number 2060-0023.

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

The New Source Performance Standards (NSPS) for Electric Utility Steam Generating Units (40 CFR part 60, subpart Da) were: proposed on September 18, 1978; promulgated on June 11, 1979 (44 FR 33613); and was last-amended on February 16, 2012. These regulations apply to electric utility steam generating units capable of combusting more than 73 megawatts (MW) heat input of fossil fuel commencing construction, modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 60, subpart Da.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports 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 two years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the U. S. Environmental Protection Agency (EPA) regional office.

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

Over the next three years, an average of 699 respondents per year will be subject to these standards, and 11 additional respondents per year will become subject to the standard.

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

There are approximately 699 electric utility steam generating facilities in the United States, which are publicly owned and operated by the electric utility steam generating industry. No facilities are owned by any state, local, or tribal entities, or by the Federal Government. All these facilities are owned and operated solely by privately owned, for-profit businesses. The “burden” to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal). The “burden” to the Federal Government is attributed entirely to work either performed by either Federal employees or government contractors, and may be found below in Table 2: Average Annual EPA Burden and Cost – NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (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, sulfur dioxide (SO2), particulate matter (PM), and nitrogen oxide (NOx) emissions from electric utility steam generating units cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart Da.

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

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

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

The notifications required in the 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, that leaks are being detected and repaired, and that the standard is being met. The performance test may also be observed.

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

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

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

**3(a) Non-duplication**

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted 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 (78 FR 33409) on June 4, 2013. 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 standards, 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.

Consultations with industry representatives (i.e., respondents) were conducted to determine if there is any way for EPA to reduce the recordkeeping and reporting burden or improve the language in the standard to make it easier to comply. In developing this ICR, EPA contacted: 1) the Electric Power Research Institute (EPRI), at (650) 855-2521; and 2) the Department of Energy, at (202) 586-3548.

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 or operators of electric utility steam generating units. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is 4911, which corresponds to the North American Industry Classification System (NAICS) code 221112 for Fossil Fuel Electric Power Generation.

**4(b) Information Requested**

**(i) Data Items**

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

A source must make the following reports:

| **Notifications/Reports** | |
| --- | --- |
| Notification of construction or reconstruction | 60.7(a)(1) |
| Notification of actual startup | 60.7(a)(3) |
| Notification of initial performance test results | 60.8(a), 60.49a(a) |
| Initial performance test | 60.8(d) |
| Demonstration of continuous monitoring system | 60.7(a)(5) |
| Monitoring system performance | 60.7(c), 60.49a(i) |
| Physical or operational change | 60.7(a)(4) |
| Daily operating parameter – emission controls | 60.49a(b) |
| Monitoring system – minimum emissions data | 60.49a(c) |
| Control system malfunction | 60.49a(d) |
| Fuel treatment credit – SO2 | 60.49a(e) |
| Data unavailability (SO2, NOx) | 60.49a(f) |
| Minimum data requirements | 60.49a(g) |
| Excess emissions | 60.7(c), 60.49a(h) |
| Quarterly reporting | 60.49a(j) |
| Semiannual reporting | 60.49a(i) |

A source must keep the following records:

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

Electronic Reporting

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

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

**(ii) Respondent Activities**

| **Respondent Activities** |
| --- |
| Read instructions. |
| Install, calibrate, maintain, and operate continuous monitoring system (CMS) for opacity, or for pressure drop and liquid supply pressure for wet scrubber. |
| Perform initial performance test, Reference Method 3B, 5, 9, and 19, and repeat performance tests if necessary. |
| Write the 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** |
| --- |
| Observe initial performance tests and repeat performance tests if necessary. |
| Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry. |
| Audit facility records. |
| Input, analyze, and maintain data in the Online Tracking Information System (OTIS). |

**5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source’s initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into 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 two years.

**5(c) Small Entity Flexibility**

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses,) was taken into consideration during the development of the regulation. According to the EPA 2006 Final Rule (71 FR 9865) regarding amendments proposed to 40 CFR part 60, subparts Da, Db, and Dc, on February 28, 2005, “ . . . at most, one entity out of five new entities in the industry may be small entities.” Applying this data to the respondent universe for this ICR results in approximately 142 small entities impacted by this ICR.

Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

**5(d) Collection Schedule**

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

**6. Estimating the Burden and Cost of the Collection**

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

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

**6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 168,258 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 $123.04 ($58.59+ 110%)

Technical $101.22 ($48.20 + 110%)

Clerical $51.18 ($24.37 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, “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 onetime 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 Respondent | (C)  Number of New Respondents | (D)  Total Capital/Startup Cost, (B X C) | (E)  Annual O&M Costs for One Respondent | (F)  Number of Respondents with O&M | (G)  Total O&M,  (E X F) |
| SO2, PM, and NOx | $200,000 | 11 | $2,200,000 | $15,000 | 699 | $10,485,000 |

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

The total operation and maintenance (O&M) costs for this ICR are $10,485,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be $12,685,000.

**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 $741,360.

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), 2013 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 Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 699 existing respondents will be subject to the standard. It is estimated that an additional 11 respondents per year will become subject. The overall, average number of respondents, as shown in the table below, is 710 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 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 | 11 | 688 | 0 | 0 | 699 |
| 2 | 11 | 699 | 0 | 0 | 710 |
| 3 | 11 | 710 | 0 | 0 | 721 |
| Average | 11 | 699 | 0 | 0 | 710 |

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

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 710.

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 |
| Notification of construction/ reconstruction | 11 | 1 | 0 | 11 |
| Notification of actual startup | 11 | 1 | 0 | 11 |
| Notify of initial performance test | 11 | 1.2 | 0 | 13.2 |
| Notification of demonstration of CMS | 11 | 1 | 0 | 11 |
| Semiannual report | 559.2 | 2 | 0 | 1,118.4 |
| Quarterly report | 139.8 | 4 | 0 | 559.2 |
|  |  |  | **Total** | **1,723.8** |

The number of Total Annual Responses is 1,724 (rounded).

The total annual labor costs are $16,458,496. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal).

**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 below, respectively, and summarized below.

**(i) Respondent Tally**

The total annual labor hours are 168,258 hours at a cost of $16,458,496. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 98 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $12,685,000. 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 16,451 labor hours at a cost of $741,360. See below Table 2: Average Annual EPA Burden and Cost – NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart Da) (Renewal).

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

There is an increase of 7,419 hours in the total estimated respondent burden compared with the ICR currently-approved by OMB. There also is an increase in capital/startup and O&M costs as compared to the previous ICR. All changes from the most recently approved ICR are due to an increase in the number of existing sources subject to the standard, and are not due to any program changes. The number of existing sources has been increased to account for industry growth that has occurred since the most recent ICR was approved.

There is also an increase in respondent and Agency burden costs from the most recently approved ICR due to the use of updated labor rates. This ICR references labor rates from the Bureau of Labor Statistics to calculate respondent burden costs, and references labor rates from OPM to calculate Agency burden costs.

**6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 98 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-2013-0019. 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), WJC 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-2013-0019 and OMB Control Number 2060-0023 in any correspondence.

**Part B of the Supporting Statement**

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

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

**Da) (Renewal)**

| **Burden Item** | **A** | **B** | **C** | **D** | **E** | **F** | **G** | **H** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Person-hours**  **per**  **occurrence** | **No. of occurrences**  **per respondent**  **per year** | **Person-hours**  **per respondent**  **per year**  **(AxB)** | **Respondents**  **per year a** | **Technical hours**  **per year (CxD)** | **Management hours**  **per year (Ex0.05)** | **Clerical hours**  **per year (Ex0.10)** | **Total cost**  **per year**  **($) b** |
| 1. Applications | N/A |  |  |  |  |  |  |  |
| 2. Survey and Studies | N/A |  |  |  |  |  |  |  |
| 3. Reporting requirements |  |  |  |  |  |  |  |  |
| A. Read instructions | 1 | 1 | 1 | 11 | 11 | 0.55 | 1.1 | $1,237.39 |
| B. Required activities |  |  |  |  |  |  |  |  |
| Initial emissions tests | 160 | 1 | 160 | 11 | 1,760 | 88 | 176 | $197,981.78 |
| Reference Method 9 | 4 | 30 | 120 | 11 | 1,320 | 66 | 132 | $148,486.34 |
| Report performance test c | 60 | 0.2 | 12 | 11 | 132 | 6.6 | 13.2 | $14,848.63 |
| C. Create information | See 3B |  |  |  |  |  |  |  |
| D. Gather existing information | See 3E |  |  |  |  |  |  |  |
| E. Write report |  |  |  |  |  |  |  |  |
| Notify of construction/reconstruction | 2 | 1 | 2 | 11 | 22 | 1.1 | 2.2 | $2,474.77 |
| Notify of actual startup | 2 | 1 | 2 | 11 | 22 | 1.1 | 2.2 | $2,474.77 |
| Notify of initial performance test | 2 | 1.2 | 2.4 | 11 | 26.4 | 1.32 | 2.64 | $2,969.73 |
| Notification of demonstration of CMS | 2 | 1 | 2 | 11 | 22 | 1.1 | 2.2 | $2,474.77 |
| Report of performance test | See 3B |  |  |  |  |  |  |  |
| Semiannual report d | 8 | 2 | 16 | 559.2 | 8,947.2 | 447.36 | 894.72 | $1,006,467.40 |
| Quarterly report e | 8 | 4 | 32 | 139.8 | 4,473.6 | 223.68 | 447.36 | $503,233.70 |
| ***Subtotal for Reporting Requirements*** |  |  |  |  | **19,246.63** | | | **$1,882,649.28** |
| 4. Recordkeeping requirements |  |  |  |  |  |  |  |  |
| A. Read instructions | See 3A |  |  |  |  |  |  |  |
| B. Plan activities | See 4C |  |  |  |  |  |  |  |
| Implement activities | See 3B |  |  |  |  |  |  |  |
| Develop record system | N/A |  |  |  |  |  |  |  |
| C. Time to check computer system and calibrate continuous monitor f | 0.5 | 365 | 182.5 | 710 | 129,575 | 6,478.75 | 12,957.5 | $14,575,846.40 |
| D. Train personnel | N/A |  |  |  |  |  |  |  |
| E. Audits | N/A |  |  |  |  |  |  |  |
| ***Subtotal for Recordkeeping Requirements*** |  |  |  |  | **149,011.25** | | | **$14,575,846.40** |
| **TOTAL ANNUAL BURDEN AND COST (rounded)** | | | | | **168,258** | | | **$16,458,496** |

Assumptions:

a. We have assumed that the average number of respondents that will be subject to the rule will be 699. There will be eleven additional new sources per year that will become subject to the rule over the three-year period of this ICR.

b. This ICR uses the following labor rates: $101.22 for technical, $123.04 for managerial, and $51.18 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, “Table 2. Civilian workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

c. We have assumed that 20 percent of initial performance test will be repeated due to failure.

d. We have assumed that 80 percent of respondents will each take 8 hours two times per year to write the semiannual report.

e. We have assumed that 20 percent of respondents will each take 8 hours four times per year to write the quarterly report.

f. We have assumed that each respondent will take 30 minutes each day to check computer system and calibrate continuous monitors.

**Table 2: Average Annual EPA Burden and Cost – NSPS for Electric Utility Steam Generating Units (40 CFR Part 60, Subpart**

**Da) (Renewal)**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Burden Item** | **A** | **B** | **C** | **D** | **E** | **F** | **G** | **H** |
| **Technical**  **person-hours**  **per occurrence** | **No. of occurrences**  **per respondent**  **per year** | **Technical**  **person-hours**  **per respondent**  **per year**  **(AxB)** | **Respondents**  **per year a** | **Technical hours**  **per year (CxD)** | **Management hours**  **per year (Ex0.05)** | **Clerical hours**  **per year (Ex0.10)** | **Total cost per year**  **($) b** |
| Performance tests |  |  |  |  |  |  |  |  |
| New plants | 24 | 1.2 | 28.8 | 11 | 316.8 | 15.84 | 31.68 | $16,418 |
| Review startup report c | 40 | 1.2 | 48 | 11 | 528 | 26.4 | 52.8 | $27,363.34 |
| Report Review |  |  |  |  |  |  |  |  |
| Notification of construction | 2 | 1 | 2 | 11 | 22 | 1.1 | 2.2 | $1,140.14 |
| Notification of actual startup | 0.5 | 1 | 0.5 | 11 | 5.5 | 0.28 | 0.55 | $285.03 |
| Notification of initial test | 0.5 | 1.2 | 0.6 | 11 | 6.6 | 0.33 | 0.66 | $342.04 |
| Notification of CMS demonstration | 0.5 | 1 | 0.5 | 11 | 5.5 | 0.28 | 0.55 | $285.03 |
| Review excess emissions reports |  |  |  |  |  |  |  |  |
| Semiannual d | 8 | 2 | 16 | 559.2 | 8,947.2 | 447.36 | 894.72 | $463,684.17 |
| Quarterly e | 8 | 4 | 32 | 139.8 | 4,473.6 | 223.68 | 447.36 | $231,842.08 |
| **TOTAL ANNUAL BURDEN AND COST (rounded)** | | | | | **16,451** | | | **$741,360** |

Assumptions:

a. We have assumed that the average number of respondents that will be subject to the rule will be 699. There will be eleven additional new sources per year that will become subject to the rule over the three-year period of this ICR.

b. This ICR uses the following labor rates: $46.21 for technical, $62.27 for managerial, and $25.01 for clerical labor. These rates are from the Office of Personnel Management (OPM) 2013 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

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

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

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