

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal),
EPA ICR Number 1063.12, OMB Control Number 2060-0035

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for the Sewage Sludge Treatment Plants were: 1) promulgated on February 28, 1974; and 2) amended on October 6, 1975, November 10, 1977, October 6, 1988, and October 17, 2000. These regulations apply to each incinerator which combusts wastes that contain more than 10 percent sewage sludge (dry basis) produced by municipal sewage treatment plants or each incinerator which charges more than 1000 kg (2205 lb.) per day municipal sewage sludge (dry basis). New facilities include those that commenced construction, modification, or reconstruction after the date of proposal. These standards set emission limitation for particulate matter (PM). This information is being collected to assure compliance with 40 CFR part 60, subpart O.

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 2 affected units (112 facilities with 218 units) at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 112 respondents per year will be subject to the standard, and an additional 0.4 respondents per year will become subject to the standard due to modification or reconstruction. This is based on the assumption that two existing facilities will

be modified or reconstructed over the next five years (0.4 facility per year).

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

All of the sewage sludge treatment plants are owned by state, local, or tribal governments. The “burden” to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (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 Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (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)(1).

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, particulate matter emissions from sewage sludge treatment plants either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart O.

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 O.

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 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 National Association of Clean Waters, at 202-833-2672; and 2) the Water Environment Federation, at 703-684-2400.

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.

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 sewage sludge treatment plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 4952 which corresponds to the North American Industry Classification System (NAICS) code 221320 for Sewage Sludge Treatment Facilities.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O).

A source must make the following reports:

Notifications and Reports	
Notification and application of construction or modification	60.7(a)
Notification of anticipated date of initial startup	60.7(a)
Notification of actual startup	60.7(a)
Notification of physical or operational change which may increase the emission rate	60.7(a)
Notification of initial performance tests	60.8(d)
Demonstration of continuous monitoring system	60.7(a)
Date upon which demonstration of continuous monitoring system performance commences	60.7(a)
Initial performance test	60.8(a)
Owner or operator of any multiple hearth, fluidized bed, or electric sludge incinerator shall submit a semiannual report which contains the following: scrubber pressure drop measurements, oxygen content,	60.155(a), 60.155(b), 60.155(c)

Notifications and Reports	
temperatures, rate of sludge charged, moisture and volatile solids of daily grab sample of sludge charged to the incinerator, and a record of control device operation measurements for other than a wet scrubber.	

A source must keep the following records:

Recordkeeping	
Startups, shutdowns, or malfunctions periods where the continuous monitoring system is inoperative.	60.7(b)
Maintain a file of all measurements including, performance test measurements, and all other information required by this subpart recorded in a permanent file suitable for inspection.	60.7(e)
Recording of daily charging rates and hours of operations	60.153(a)(1)
Install, calibrate, maintain and operate weighing device for determination of the mass of any municipal solid waste charged to the incinerator.	60.153(a)(3)
Install, calibrate, maintain and operate a monitoring device that continuously measures and records the pressure drop of gas flow through the wet scrubbing device.	60.153(b)(1)
Install, calibrate, maintain and operate a monitoring device that continuously measures and records the oxygen content of the incinerator exhaust gas.	60.153(b)(2)
Install, calibrate, maintain and operate temperature measuring devices. The temperature monitoring devices shall be operated continuously and data recorded during all periods of operation of the incinerator.	60.153(b)(3)
Install, calibrate, maintain and operate a device for measuring the fuel flow to the incinerator. The fuel flow measuring device shall be operated continuously and data recorded during all periods of operation of the incinerator.	60.153(b)(4)
Collect and analyze a grab sample of the sludge fed to the incinerator once per day.	60.153(b)(5)
Test methods and procedures for performance tests.	60.154

Recordkeeping	
Install, calibrate, maintain, and operate continuous monitoring system.	60.13
Owner or operator of any multiple hearth, fluidized bed, or electric sludge incinerator subject to the provisions of this subpart, shall retain the following information and make it available for inspection: the measured pressure drop of the gas flow through the wet scrubbing device, a record of the measured oxygen content of the incinerator exhaust gas, record of the rate of sludge charged to the incinerator, the measured temperatures of the incinerator, the fuel flow to the incinerator, and the total solids and volatile solids content of the sludge charges to the incinerator.	60.153(c)(1), 60.153(c)(2), and 60.153(c)(3)
The owner or operator of any sludge incinerator other than a multiple hearth, fluidized bed, or electric incinerator or any sludge incinerator equipped with a control device other than a wet scrubber shall submit for approval a plan for monitoring and recording incinerator and control device operation parameters.	60.153(e)
Maintain 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 CMS for opacity, or for pressure drop and liquid supply pressure for wet scrubber.
Perform initial performance test, Reference Method 5 and 9 test, and repeat tests if necessary.

Respondent Activities
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.
Adjust 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 test 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 these regulations must be retained by the owner/operator for two 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 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 below 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 collection are mandatory. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information 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 record-keeping and reporting requirements is estimated to be 12,464 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 types 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 regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) 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)
Particulate Matter	\$100,000	0.4	\$40,000	\$35,000	112	\$3,920,000

The total capital/startup costs for this ICR are \$40,000. This is the total of column D in

the above table.

The total operation and maintenance (O&M) costs for this ICR are \$3,920,000. This is the total of column G.

The average annual cost for both capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$3,960,000. 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 \$94,499.

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 Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (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 112 existing respondents will be subject to the standards. It is estimated that an additional 0.4 respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 112 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	0.4	112	0	0.4	112
2	0.4	112	0	0.4	112
3	0.4	112	0	0.4	112
Average	0.4	112	0	0.4	112

¹ New respondent include sources with constructed, reconstructed and modified affected facilities.

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 112.

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	0.4	1	N/A	0.4
Notification of physical and operational changes	0.4	1	N/A	0.4
Notification of demonstration of CMS	0.4	1	N/A	0.4
Notification of actual startup	0.4	1	N/A	0.4
Notification of initial performance test	0.4	1	N/A	0.4
Semiannual report of excess emissions	112	2	N/A	224
			Total	226

The number of Total Annual Responses is 226.

The total annual labor costs are \$1,219,185. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (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 below in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 12,464 hours at a cost of \$1,219,185. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 55 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$3,960,000. 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 2,097 labor hours at a cost of \$94,499. See Table 2 below: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal).

6(f) Reasons for Change in Burden

There is no change in labor hours in this ICR compared to the most recently approved ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, so there is no significant change in the overall burden. However, there is a slight increase in the respondent labor costs due to the use of updated labor rates.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 55 hours per response (rounded). “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-2013-0310. 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-2013-0310 and OMB Control Number 2060-0035 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 Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal)

Burden Items	(A) Person hours per Occurrence	(B) No of occurrences per respondent per Year	(C) Person hours per respondent per year (C=AxB)	(D) Number of respondents per Year	(E) Technical person hours per Year (E=CxD)	(F) Management person hours per Year (E x 0.05)	(G) Clerical Hours per year (E x 0.1)	(H) Total Costs per Year ^a
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read Instructions ^{b,c}	1	1	1	0.4	0.4	0.02	0.04	\$45.00
B. Required Activities								
New Sources								
Initial performance test ^{b,c}	72	1	72	0.4	28.8	1.44	2.88	\$3,239.71
Demonstration of monitoring system	Incl. in performance test							
Repeat of performance test ^d	72	1	72	0.08	5.76	0.29	0.58	\$647.94
C. Create Information								
D. Gather Existing Information	N/A							
E. Write Report								
New Sources								
Notification of construction/ reconstruction ^{b,c}	2	1	2	0.4	0.8	0.04	0.08	\$89.99
Notification of physical and operational changes ^e	2	1	2	0.4	0.8	0.04	0.08	\$89.99
Notification of demonstration of CMS ^{b,c}	40	1	40	0.4	16	0.8	1.6	\$1,799.84
Notification of actual startup ^{b,c}	2	1	2	0.4	0.8	0.04	0.08	\$89.99
Notification of initial performance test ^{b,c}	2	1	2	0.4	0.8	0.04	0.08	\$89.99
Performance test report								
Semiannual reports of excess emissions ^{f,g}	40	2	80	112	8,960	448	896	\$1,007,910.40

Burden Items	(A) Person hours per Occurrence	(B) No of occurrences per respondent per Year	(C) Person hours per respondent per year (C=AxB)	(D) Number of respondents per Year	(E) Technical person hours per Year (E=CxD)	(F) Management person hours per Year (E x 0.05)	(G) Clerical Hours per year (E x 0.1)	(H) Total Costs per Year ^a
Subtotal for Reporting Requirements						10,366.29		\$1,014,002.85
5. Recordkeeping Requirements								
A. Read Instructions								
B. Plan Activities								
C. Implement Activities								
D. Develop Record System ^h	N/A							
E. Time to Enter Information								
Record of daily production rate and hours of operation ^{g, h}	8	1	8	112	896	44.8	89.6	\$100,791.04
Records of startup, shutdown and malfunction ^g	8	1	8	112	896	44.8	89.6	\$100,791.04
Records of performance test data ^{b, c, i}	80	1	80	0.4	32	1.6	3.2	\$3,599.68
Subtotal for Recordkeeping Requirements						2,097.6		\$205,181.76
TOTAL LABOR BURDEN AND COST (rounded)						12,464		\$1,219,185

Assumptions:

^a This ICR uses the following labor rates: \$123.04 per hour for Executive, Administrative, and Managerial labor; \$101.22 per hour for Technical labor, and \$51.18 per hour for Clerical labor. These rates are 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 rate has been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^b Assume that there will be 1.2 new, modified, or reconstructed units constructed over the next three years or 0.4 source per year.

^c Assume that this is a one-time-only cost.

^d Assume that 20 percent would have to repeat the performance testing due to failure.

^e Assume that 0.4 facility will have a physical or operational change.

^f Assume that it will take 40 hours to write semiannual reports.

^g Assume that there are 112 facilities subject to this rule.

^h Assume that it will take eight hours per year to record daily gathering of monitoring data (which have been automatically recorded).

ⁱ Assume that it will take 80 hours per year to record performance test data.

Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal)

REPORTING/RECORDKEEPING REQUIREMENT	(A) EPA hours per occurrence	(B) No of occurrences per Plant per Year	(C) EPA Hours per Year (C=AxB)	(D) Plants per Year	(E) Technical Hours per Year (E=CxD)	(F) Managemen t Hours per Year (Ex0.05)	(G) Clerical Hours per Year (E x 0.1)	(H) Costs per Year ^a
Initial Performance Test ^{b, c}	24	1	24	0.4	24	1.2	2.4	\$1,244.00
Repeat initial performance test								
Retesting preparation ^{b, c, d}	24	1	24	0.08	1.92	0.10	0.19	\$99.52
Report Review								
Notification of construction/ reconstruction ^{b, c}	2	1	2	0.4	0.8	0.04	0.08	\$41.47
Notification of physical and operational changes ^e	2	1	2	0.4	0.8	0.04	0.08	\$41.47
Notification of actual startup ^{b, c}	0.5	1	0.5	0.4	0.2	0.01	0.02	\$10.37
Initial test ^{b, c}	0.5	1	0.5	0.4	0.2	0.01	0.02	\$10.37
Repeat performance test	8	1	8	0.4	3.2	0.16	0.32	\$165.87
Semiannual reports ^{f, g}	8	2	16	112	1,792	89.6	179.2	\$92,885.63
TOTAL LABOR BURDEN and COST (rounded)						2,097		\$94,499.

Assumptions:

^a This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 for Managerial (GS-13, Step 5, \$38.92 x 1.6), \$46.22 for Technical (GS-12, Step 1, \$28.88 x 1.6) and \$25.01 Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) "2013 General Schedule" which excludes locality rates of pay.

^b Assume that there will be 0.4 new, modified or reconstructed unit constructed per year over the next three years.

^c Assume that this is a one-time-only cost.

^d Assume that 20 percent would have to repeat the performance testing due to failure.

^e Assume that 0.4 source will have a physical or operational change.

^f Assume that it will take eight hours to review semiannual reports.

^g Assume that there are 112 sources subject to this rule.

