

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (Renewal), EPA ICR Number 2369.03, OMB Control Number 2060-0658

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Sewage Sludge Incineration Units (40 CFR part 60, subpart LLLL) were proposed on October 14, 2010 (75 FR 63260) and promulgated on March 21, 2011 (76 FR 15372). These regulations apply to new facilities, which include those with a sewage sludge incineration (SSI) unit constructed after the date of proposal or commenced modification later than six months after the promulgation of the final standards. This information is being collected to assure compliance with 40 CFR part 60, subpart LLLL.

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

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the U. S. Environmental Protection Agency (EPA) regional office.

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

According to the National Association of Clean Water Agencies (NACWA), most facilities with operating units will comply with the existing source emission limits, rather than the NSPS limits, because they were constructed or modified before the applicable NSPS dates. However, one existing source intends to comply with the NSPS due to modification after the applicable date, and there are two utilities that have already initiated, or plan to initiate, construction of new SSI units. Therefore, although currently there are no respondents subject to the standards, we anticipate that three facilities will become subject over the next three years. For the purposes of calculating the "burden", we assume an average of one respondent per year will become subject to the standards.

Based on the assumed distribution of new or modified facilities with affected sewage sludge incinerators, there are three facilities which will be affected: two newly constructed SSI units and one modified unit are expected to be subject to the standards. These facilities are assumed to be located in the public sector. The “burden” to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (Renewal). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and is presented in below Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (Renewal).

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

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 (PM), hydrogen chloride (HCl), carbon monoxide (CO), dioxin/furan, mercury (Hg), oxides of nitrogen (NO_x), sulfur dioxide (SO₂), cadmium, lead, and fugitive emissions from sewage sludge incineration 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 LLLL.

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 or continuous parametric 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 (and/or) leaks are being detected and repaired and the standard is 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 LLLL.

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 (FR citation, e.g., 78 FR 35023) on June 11, 2013. 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. Approximately three respondents will be subject to the standard over the three year period covered by this ICR.

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 Water Agencies, at (202)833-9106; and 2) the Water Environment Federation, at (703)684-2437.

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 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 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 standards 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 new or modified SSI units. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 49539907, which corresponds to the North American Industry Classification System (NAICS) code 221320 for Sewage 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 Incineration Units (40 CFR Part 60, Subpart LLLL).

A source must make the following reports:

Notifications	
Notification of intent to construct, including anticipated date of commencement of construction, documentation for siting requirements, and anticipated date of initial startup.	60.4915(a)
Notification of actual startup, including maximum design dry sewage sludge burning capacity, anticipated maximum feed rate, petition for site-specific operating limits if applicable, and site-specific monitoring plan.	60.4915(b)

Notifications	
Notification of intent to start or stop use of a CMS.	60.4915(h)
Notification of performance test.	60.4915(h)
Notification to reschedule performance test.	60.4915(h)

Reports	
Initial compliance report, no later than 60 days after initial performance test.	60.4915(c)
Annual compliance report.	60.4915(d)
Deviation report if operating limits or emission limits are exceeded.	60.4915(e)
Report of force majeure event occurrences.	60.4915(g)

A source must keep the following records:

Recordkeeping	
Maintain all records for five years.	60.4910
Record calendar date of each record.	60.4910(a)
Maintain records of documentation of siting requirements.	60.4910(b)
Maintain records of site-specific information and incinerator operation procedures and the names of persons who have completed review of this information.	60.4910(c)(1)
Maintain records of names of persons who have completed the operator training requirements, including documentation of the training and the dates of the training.	60.4910(c)(2)
Maintain records showing the periods when no qualified operators were accessible for more than 8 hours, but less than two weeks.	60.4910(c)(3)
Maintain records showing the periods when no qualified operators were accessible for two weeks or more.	60.4910(c)(4)
Maintain records of control device inspections.	60.4910(d)
Maintain records of initial performance tests, annual performance tests, and any subsequent performance tests.	60.4910(e)
Maintain records of all continuous monitoring data; includes	60.4910(f)

Recordkeeping	
continuous emissions monitors, continuous automated sampling systems, and continuous parameter monitors.	
Maintain records of other information for continuous monitoring systems.	60.4910(g)
Maintain records of days when a deviation from the operating or emission limits have occurred, including a description of the deviation and a description of the corrective actions taken.	60.4910(h)
Maintain equipment vendor specifications for the incinerator, emission controls, and monitoring equipment.	60.4910(i)
Maintain records of calibration of any monitoring devices.	60.4910(j)
Maintain records of monitoring plan and performance evaluations.	60.4910(k)
Maintain records of less frequent testing.	60.4910(l)
Maintain records of use of bypass stack.	60.4910(m)

Electronic Reporting

Some of the respondents may use 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 and understand rule requirements.
Prepare siting analysis.
Establish and teach operator qualification course and obtain operator qualification.

Respondent Activities
Install, calibrate, maintain, and operate continuous parameter monitoring systems, including CEMS.
Perform initial performance test and establish operating limits for each operating parameter.
Continuously monitor operating parameters.
Conduct annual performance tests.
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.
Transmit, or otherwise disclose the information.

Sources will use 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.

Agency Activities
Prepare an annual summary report.
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 five years.

5(c) Small Entity Flexibility

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

The NSPS does not contain any provisions reserved exclusively for the benefit of small entities. However, the NSPS does contain provisions that reduce the impact on all regulated entities, which would include any small entities. The owner or operator is allowed to conduct performance tests once every three years to show compliance if certain criteria are met. Deviation reports are required only if there is a deviation, otherwise reporting is annual, and operating parameter monitoring is required instead of continuous emissions monitoring systems (CEMS) for all pollutants except for CO.

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 Incineration Units (40 CFR Part 60, Subpart LLLL) (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 798 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 standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring and performance tests. 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 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 per Year	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents per Year with O&M	(G) Total Annual O&M, (E X F)
CPMS ^a	\$226,946	1	\$226,946	\$81,160	1	\$81,160
Stack testing ^b	\$61,350	1	\$61,350			\$0
Filing cabinet ^c	\$100	1	\$100			\$0
Total			\$288,396			\$81,160

a. Based on estimated monitoring costs provided in regulatory support documentation.

b. Total estimated cost for initial stack test, including Method 5 (PM), Method 9 (opacity), Method 10 (CO), Method 26 (HCl), Method 29 (metals), Method 23 (CDD/CDF), Method 7E (NO_x), and Method 6C (SO₂). Facilities may test every three years if certain requirements are met, and it is assumed most facilities would meet the requirements. Thus, annual testing following the initial performance test is not considered over the 3-year period of this ICR.

c. Assumed \$100 for purchase of filing cabinet to house copy of rule, records and report copies.

The total annual capital/startup costs for this ICR are \$288,396. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$81,160. 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 \$369,556. 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 \$14,510.

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

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

These rates are from the Office of Personnel Management (OPM), 2012 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (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 one existing respondents will be subject to the standards. It is estimated that one additional respondent per year will become subject to the standards. The overall average number of respondents, as shown in the table below, is two per year.

This is based on industry data indicating no respondents are currently subject to the standards; however, two new units and one modified unit are expected to become subject to the standards within the next three years.

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	1	0	0	0	1
2	1	1	0	0	2
3	1	2	0	0	3
Average	1	1	0	0	2

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 2.

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 $E=(B \times C)+D$
Notification of construction	1	1	0	1
Notification of start-up	1	1	0	1
Notification of initial performance test	1	1	0	1
Notification of initial CMS Demonstration	1	1	0	1
Initial Compliance Report	1	1	0	1
Annual Compliance Report ^a	2	0	0	0
Status report for operators that are off-site for more than 2 week ^b	1	1	0	1
Corrective action summary for operators that are off-site for more than 2 weeks ^b	2	1	0	2
Semiannual Deviation Report	2	1	0	2
			Total	10

^a Facilities may test every three years if certain requirements are met, and it is assumed most facilities would meet the requirements.

^b Assumed that 10 percent of the facilities (conservatively rounded to one) would not have a qualified operator available for more than two weeks at least once a year. Assumed this would require only two corrective action summaries.

The total number of Annual Responses is 10.

The total annual labor costs are \$78,068. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (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 798 hours at a cost of 78,068. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 80 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$369,556. 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 322 labor hours at a cost of \$14,510. See Table 2 below: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (Renewal).

6(f) Reasons for Change in Burden

There is an increase in respondent and Agency burden in this ICR compared to the previous ICR. The increase is due to an adjustment in the estimated number of sources. The previous ICR estimated two new units subject to the standard during the initial three-year compliance period. However, recent research indicates there are still no units subject to the standard at this time. Those same two new units are expected to become subject during three-year period of this ICR, and another unit is expected to be modified and therefore, will also be subject to the NSPS. This change in estimate also results in an increase in the annual combined sums of the total capital/startup and O&M costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 80 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-2013-0321. 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-2013-0321 and OMB Control Number 2060-0658 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 Incineration Units (40 CFR part 60, subpart LLLL) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person/ hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions ^{c, d, h}	40	1	40	1	40	2	4	\$4,499.59
B. Required activities								
i. Initial stack test and report ^c	40	1	40	1	40	2	4	\$4,499.59
ii. Annual stack test and report ^{e, h}	40	1	40	0	0	0	0	\$0
iii. Operator training and qualification								
a. Establish and teach operator qualification course ^{c, d}	64	1	64	1	64	3.2	6.4	\$7,199.34
b. Obtain operator qualification ^{c, d}	72	1	72	1	72	3.6	7.2	\$8,099.25
c. Annual refresher course	12	1	12	1	12	0.6	1.2	\$1,349.88
d. Initial review of site-specific information	See 3B (iii.a.)							
e. Annual review of site-specific information ^e	8	1	8	2	16	0.8	1.6	\$1,799.83
iv. Establish operating parameters ^c	40	1	40	1	40	2	4	\$4,499.59
v. Continuous parameter monitoring (including CEMS)	11	1	11	2	22	1.1	2.2	\$2,474.77
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
i. Notification of construction/reconstruction and siting analysis ^c	160	1	160	1	160	8	16	\$17,998.34
ii. Notification of actual startup and monitoring plan	40	1	40	1	40	2	4	\$4,499.59
iii. Notification of initial performance test ^c	2	1	2	1	2	0.1	0.2	\$224.98
iv. Notification of demonstration of CMS ^b	2	1	2	1	2	0.1	0.2	\$224.98
v. Initial compliance report	40	1	40	1	40	2	4	\$4,499.59
vi. Annual compliance report	40	1	40	0	0	0	0	\$0

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person/ hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
vii. Status report for operators that are off-site for more than 2 weeks ^f	8	1	8	1	8	0.4	0.8	\$899.92
viii. Corrective action summary for operators that are off-site for more than 2 weeks ^f	8	2	16	1	16	0.8	1.6	\$1,799.83
ix. Semiannual Deviation Report ^g	24	2	48	1	48	2.4	4.8	\$5,399.50
Subtotal for Reporting Requirements						715.3		\$69,968.56
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system	N/A							
E. Record Information								
i. Records of operating parameters	2	52	104	0	0	0	0	\$0
ii. Records of exceedances of the operating parameters	2	1	2	1	2	0.1	0.2	\$224.98
iii. Records of stack tests	2	1	2	2	4	0.2	0.4	\$449.96
iv. Records of siting analysis	2	1	2	1	2	0.1	0.2	\$224.98
v. Records of persons who have reviewed operating procedures	2	1	2	2	4	0.2	0.4	\$449.96
vi. Records of persons who have completed operator training	2	1	2	2	4	0.2	0.4	\$449.96
vii. Records of persons who meet operator qualification criteria	2	1	2	2	4	0.2	0.4	\$449.96
viii. Records of monitoring device calibration	2	1	2	2	4	0.2	0.4	\$449.96
ix. Records of site-specific documentation	24	1	24	2	48	2.4	4.8	\$5,399.50
F. Train personnel	See 3B							
G. Audits	N/A							
Subtotal for Recordkeeping Requirements						82.8		\$8,099.25
TOTAL LABOR BURDEN AND COST (rounded)						798		\$78,068

Assumptions:

- ^a. There are currently no existing units subject to the standard, and we expect three new sources to become subject over the three-year period of this ICR. We have assumed that the average number of respondents that will be subject to the rule will be 1 existing source and one new source.
- ^b. 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 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. One-time only costs.
- ^d. Cost incurred by a facility regardless of the number of affected units at the plant.
- ^e. Annual cost. Annual costs are not incurred until the second year of operation.
- ^f. Assumed that 10 percent of the facilities (conservatively rounded to one) would not have a qualified operator available for more than two weeks at least once a year. Assume that this would require only two corrective action summaries.
- ^g. Assumed that 10 percent of the facilities would have an exceedance during the year.
- ^h. Facilities may test every three years if certain requirements are met, thus annual testing is divided by three to give a per year cost. It is assumed most facilities would meet the requirements.

Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
1. Applications	N/A							
2. Read and Understand Rule Requirements	40	1	40	1	40	2	4	\$2,072.90
3. Required Activities								
A. Observe stack tests ^c	48	1	48	1	48	2.4	4.8	\$2,487.48
B. Excess emissions - Enforcement activities	24	1	24	1	24	1.2	2.4	\$1,243.74
C. Create Information	N/A							
D. Gather Information	N/A							
E. Report Reviews								
i. Review initial notifications ^d	40	2	80	1	80	4	8	\$4,145.79
ii. Review initial compliance report	40	1	40	1	40	2	4	\$2,072.90
iii. Review annual compliance report	8	0	0	1	0	0	0	\$0
iv. Review semi-annual excess emission and parameter exceedance report	16	1	16	2	32	1.6	3.2	\$1,658.32
v. Review status reports and corrective action summary for operators off-site	4	1	4	2	8	0.4	0.8	\$414.58
F. Prepare annual summary report ^e	4	1	4	2	8	0.4	0.8	\$414.58
Subtotals Labor Burden and cost					280	14	28	\$14,510.27
TOTAL LABOR BURDEN AND COST (rounded)						322		\$14,510

Assumptions:

- a. There are currently no existing units subject to the standard, and we expect three new sources to become subject over the three-year period of this ICR. We have assumed that the average number of respondents that will be subject to the rule will be 1 existing source and one new source.
- 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), and \$25.01 Clerical rate (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) "2010 General Schedule", which excludes locality rates of pay.
- c. Assumes EPA personnel attend 20 percent of the stack tests (conservatively rounded up to one plant). Assume all facilities meet reduced testing requirements, so only initial stack test required over three year period.
- d. Includes notification of construction and notification of start-up for new units.
- e. Assumes four hours per state to write annual summary report.