SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NSPS for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart CCCC) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart CCCC) (Renewal), EPA ICR Number 2384.03, OMB Control Number 2060-0662

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Commercial and Industrial Solid Waste Incineration (CISWI) Units were proposed on April 29, 2010, promulgated on March 21, 2011, and last-amended on February 7, 2013. The regulation at subpart CCCC amended the 2000 CISWI NSPS by re-establishing emission limits and expanding the rule to cover additional four CISWI subcategories: energy recovery units; waste burning kilns; burn-off ovens; and small, remote incinerators. Subpart CCCC applies to new CISWI units that commenced construction after June 4, 2010, or commenced reconstruction or modification after August 7, 2013. The subpart does not affect CISWI units that undergo physical or operational changes primarily to comply with the Emission Guidelines at subpart DDDD. This information is being collected to assure compliance with 40 CFR part 60, subpart CCCC.

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

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

The population of CISWI units has been declining for several years. No new CISWI units are being constructed, even in the absence of regulations, because other waste disposal alternatives, such as landfilling, are usually more economical. However, for the small remote incinerator subcategory, we realize that other waste disposal alternatives may be unavailable, and therefore some new units may be constructed or older units replaced as their useful life expires. For all other subcategories, the cost of complying with the NSPS makes it even more likely that sources will select an alternative method of waste disposal and no new units in these subcategories will be constructed.

Over the next three years, we estimate an average of 4 respondents per year will be subject to these standards, and 1 additional respondent per year will become subject to these same standards. This is based on the assumption that one new small, remote incinerator is being constructed per year since these regulations were proposed.

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

The "Affected Public" are owners and operators of new CISWI units. The "burden" to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart CCCC) (Renewal). The Federal Government burden 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 Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart CCCC) (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, particulate matter (PM), dioxins/furans, hydrogen chloride (HCl), cadmium (Cd), lead (Pb), mercury (Hg), carbon monoxide (CO), nitrogen oxides (NOx) and sulfur dioxide (SO_2) emissions from CISWI 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 CCCC.

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 these standards are used to inform either the Agency or its delegated authority when a source becomes subject to the requirements of these 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 these standards 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 CCCC.

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 exists.

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 35023) on June 11, 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 standards as they were being developed and the standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Alaska Oil and Gas Association, at (907) 279-1481; and 2) the National Waste & Recycling Association, at (800) 424-2869.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with Part 70 permit program and the five-year statute of limitations on which the permit program is

based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are owners and operators of CISWI units. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standard and the corresponding North American Industry Classification System (NAICS) are listed in the table below:

40 CFR Part 60, Subpart CCCC	SIC Codes	NAICS Codes
Chemical Manufacturing	2865, 2869, 2813, 2879, 2851, 2899, 2891, 2844, 2893, 2892	325
Wholesale Trade, Durable Goods	5012, 5013, 5014, 5015, 5021, 5023, 5031, 5032, 5033, 5039, 5043, 5044, 5045, 5046, 5047, 5048, 5049, 5051, 5052, 5063, 5064, 5065, 5072, 5074, 5075, 5078, 5082, 5083, 5084, 5085, 5087, 5088, 7389, 5091, 5092, 5093, 5094, 5099, 7822	421
Wood Product Manufacturing	2429, 2441, 2448, 2449	321
Furniture and Related Product Manufacturing	2432, 5712, 2515, 2591	337

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart CCCC).

A source must make the following reports:

Notifications/Reports	
Preconstruction report • Statement of intent to construct • Anticipated date of commencement of construction • Documentation for siting requirements • Waste management plan • Anticipated date of initial startup	60.2190(a)-(e)
Startup notification	60.2195(a)-(e)
Initial test report	60.2200
Annual compliance report	60.2205, 60.2210
Emission limitation or operating limit deviation report	60.2215, 60.2220
Qualified operator deviation notification	60.2225(a)(1)
Qualified operator deviation status report	60.2225(a)(2)

Notifications/Reports	
Qualified operator deviation notification of resumed operation	60.2225(b)

A source must keep the following records:

Recordkeeping	
Records of operating parameters	60.2175(b), (p)
Records of malfunction of the unit	60.2175(s), (u)
Records of exceedances of the operating parameters	60.2175(e)
Records of stack tests	60.2175(f)
Records of siting analysis	60.2175(g)
Records of persons who have reviewed operating procedures	60.2175(h)
Records of persons who have completed operator training	60.2175(i)
Records of persons who meet operator qualification criteria	60.2175(j)
Records of monitoring device calibration and inspection	60.2175(k), (o)

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 Hg, Pb, Cd, HCl, PM, CO, dioxins/furans, NOx, and SO_2.
Perform initial performance test, and repeat performance 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.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

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

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated.

Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, 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. We expect the NSPS will only affect units in the small remote incinerator subcategory, which will consist primarily of large oil exploration and development entities.

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 (in the unlikely event that any new CISWI units are built). The owner or operator is allowed to skip two annual performance tests for a pollutant if all performance tests over the previous three years show compliance. Deviation reports are required only if there is a deviation, otherwise reporting is annual.

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 below in Table 1: Annual Respondent Burden and Cost – NSPS for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart CCCC) (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 record-keeping and reporting requirements is estimated to be 1,036 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 one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(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)
Bag Leak Detectors	$3,500	1	$3,500	$9,700	4	$38,800
CO CEMS	$12,600	1	$12,600	$41,400	4	$165,600
ACI Monitors	$0	1	$0	$4,200	4	$16,800
Stack Tests	$55,000	1	$55,000	$14,533	4	$58,132
Postage for Performance Tests	$7.5	1	$7.5	$7.50	4	$30
Postage for Semiannual reports	$0	0	$0	$15	0.4	$6
Total			**$71,108**			**$279,368**

The total capital/startup costs for this ICR are $71,108. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $279,368. 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 $350,476. 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 $15,817.

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 Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart CCCC) (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 4 existing respondents will be subject to the standard. It is estimated that an additional 1 respondent per year will become subject. The overall average number of respondents, as shown in the table below, is 5 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents [1]	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	1	3	0	0	4
2	1	4	0	0	5
3	1	5	0	0	6
Average	1	4	0	0	**5**

[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 5.

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
1) Notification of initial performance test	1	2	0	2
2) Notification of initial CMS Demonstration	1	1	0	1
3) Report of initial performance test	1	2	0	2
4) Report of initial CMS demonstration	NA		0	
5) Report prior to construction (includes siting analysis)	1	1	0	1
6) Report prior to initial start-up	0.33	1	0	0.33
7) Report of initial stack test	NA		0	
8) Report established values for site-specific operating parameters	1	1	0	1
9) Waste management plan	1	1	0	1
10) Annual Report	4	1	0	4
11) Status report for operators that are off-site for more than 2 weeks	0.4	2	0	0.8
12) Corrective action summary for operators that are off-site for more than 2 weeks	0.4	4	0	1.6
13) Semiannual report of emissions/parameter exceedances	0.4	2	0	0.8
			Total	**15.53**

NA - Included in capital/startup costs

The number of Total Annual Responses is 16 (rounded).

The total annual labor costs are $101,383. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart CCCC) (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 1,036 hours at a cost of $101,383. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart CCCC) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 65 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $350,476. 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 351 labor hours at a cost of $15,817. See below Table 2: Average Annual EPA Burden and Cost – NSPS for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart CCCC) (Renewal).

6(f) Reasons for Change in Burden

There is an increase in the total estimated respondent burden compared with the ICR currently approved by OMB. This increase is due to a multitude of factors including an increase in the respondent universe since the last ICR period, an update to the labor rates, as well as corrections to errors in the burden estimates. The primary correction included revising the number of existing respondents subject to annual reporting and recordkeeping requirements.

There is also an increase in the total capital and O&M costs due to an increase in the number of respondents. In addition, this ICR corrects the number of respondents that have to maintain monitors, which also contributes to the increase in O&M costs.

There is a decrease in the Agency burden and cost due to several corrections, primarily associated with the frequency of observing initial stack tests and reviewing excess emission reports.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 65 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-2013-0315. 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-2013-0315 and OMB Control Number 2060-0662 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 Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart CCCC) (Renewal)

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (A x B)	(D) Number of Respondents Per Year	(E) Technical Hours Per Year (C x D)	(F) Management Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	H Total Labor Costs Per Year [a]
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Read and Understand Rule Requirements [b]	1	1	1	1	1	0.05	0.1	$112.49
B. Required Activities								
1) Initial stack test and report (PM, dioxins/furans, opacity, HCl, Cd, Pb, Hg, CO, NOx, and SO2)	Incl. in Capital/Startup							
2) Annual stack test and test report (PM, HCl, Opacity, and Fugitive Ash)[c]	Incl. in O&M							
3) Operator training and qualification								
a) Establish and teach operator qualification course [b]	64	1	64	1	64	3.2	6.4	$7,199.36
b) Obtain operator qualification [b]	72	1	72	1	72	3.6	7.2	$8,099.28
c) Annual refresher course [c]	12	1	12	4	48	2.4	4.8	$5,399.52
d) Initial review of site-specific information	Incl. in 3A							
e) Annual review of site-specific information [c]	8	1	8	4	32	1.6	3.2	$3,599.68
4) Establish operating parameters (maximum and minimum)[b]	40	1	40	1	40	2	4	$4,499.60
5) Continuous parameter monitoring (including CEMS)								
a) Initial monitoring	17	1	17	1	17	0.85	1.7	$1,912.33
b) Annual monitoring	17	1	17	4	68	3.4	6.8	$7,649.32
C. Create Information	Incl. in 3B							
D. Gather Information	Incl. in 3E							
E. Report Preparation								
1) Notification of initial performance test [c]								

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (A x B)	(D) Number of Respondents Per Year	(E) Technical Hours Per Year (C x D)	(F) Management Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	H Total Labor Costs Per Year [a]
a) Pollutants, fugitive ash emissions	2	1	2	1	2	0.1	0.2	$224.98
b) Fugitive Ash Emissions	1	1	1	1	1	0.05	0.1	$112.49
2) Notification of initial CMS Demonstration [b]	2	1	2	1	2	0.1	0.2	$224.98
3) Report of initial performance test [c]								
a) Pollutants, fugitive ash emissions	8	1	8	1	8	0.4	0.8	$899.92
b) Fugitive Ash Emissions	2	1	2	1	2	0.1	0.2	$224.98
4) Report of initial CMS demonstration	Incl. in Capital/Startup							
5) Report prior to construction (includes siting analysis) [b]	160	1	160	1	160	8	16	$17,998.40
6) Report prior to initial start-up								
a) Without site specific parameter petition	6	1	6	0	0	0	0	$0
b) With site specific parameter petition [f]	14	1	14	0.33	4.67	0.23	0.47	$524.95
7) Report of initial stack test	Incl. in 3B(1)							
8) Report established values for site-specific operating parameters	Incl. in 3B							
9) Waste management plan [b]	160	1	160	1	160	8	16	$17,998.40
10) Annual Report:								
a) Results of performance tests conducted during the year [c]	40	1	40	4	160	8	16	$17,998.40
11) Status report for operators that are off-site for more than 2 weeks [d]	8	2	16	0.4	6.4	0.32	0.64	$719.94
12) Corrective action summary for operators that are off-site for more than 2 weeks [d]	8	4	32	0.4	12.8	0.64	1.28	$1,439.87
13) Semiannual report of emissions/parameter exceedances [e]	24	2	48	0.4	19.2	0.96	1.92	$2,159.81
Subtotal for Reporting Requirements					**1,012.08**			**$98,998.70**
4. Recordkeeping Requirements								
A. Read Instructions	Incl. in 3A							
B. Plan Activities	N/A							

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (A x B)	(D) Number of Respondents Per Year	(E) Technical Hours Per Year (C x D)	(F) Management Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	H Total Labor Costs Per Year [a]
C. Implement Activities	N/A							
D. Develop Record System	N/A							
E. Record Information								
1) Records of operating parameters	Incl. in 3B(5b)							
2) Records of periods for which minimum amount of data on operating parameters were not obtained	0.5	52	26	0	0	0	0	$0
3) Records of malfunction of the unit	1.5	1	1.5	0	0	0	0	$0
4) Records of exceedances of the operating parameters [e]	1.5	2	3	0.4	1.2	0.06	0.12	$134.99
5) Records of stack tests	Included in 3E							
6) Records of siting analysis	Included in 3E							
7) Records of persons who have reviewed operating procedures [b, c]	1	1	1	4	4	0.2	0.4	$449.96
8) Records of persons who have completed operator training [b, c]	1	1	1	4	4	0.2	0.4	$449.96
9) Records of persons who meet operator qualification criteria [b, c]	1	1	1	4	4	0.2	0.4	$449.96
10) Records of monitoring device calibration	Included in 3B							
11) Records of site-specific documentation [f]	24	1	24	0.33	8	0.4	0.8	$899.92
F. Personnel Training	Included in 3B							
G. Time for Audits	N/A							
Subtotal for Recordkeeping Requirements						**24.38**		**$2,384.79**
TOTAL LABOR BURDEN AND COST (rounded)						**1,036**		**$101,383**

Assumptions:

(a) 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.

(b)One-time only costs (1 new respondent per year).

(c) This ICR assumes the average number of respondents incurring costs during the 3 year period is 4.

(d) Assumed that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year. Assumed that this required only two corrective action summaries.

(e) Assumed that 10 percent of the facilities would have an exceedance during the year.

(f)Assumed that one-third of the facilities will petition for site-specific parameters.

Table 2: Average Annual EPA Burden and Cost – NSPS for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart CCCC) (Renewal)

Burden Item	(A) EPA Hours per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) EPA Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondents Per Year	(E) Technical Hours Per Year (CXD)	(F) Management Hours Per Year (E x 0.05)	(G) Clerical Hours Per Year (E x 0.1)	(H) Total Costs, $
1. Applications	N/A							
2. Read and Understand Rule Requirements [b]	16	1	16	0	0	0	0	$0
3. Required Activities								
A. Observe initial stack tests (PM, dioxins/furans, opacity, HCl, Cd, Pb, Hg, CO, NOx, and SO2)[a]	48	1	48	0.2	9.6	0.48	0.96	$497.52
B. Excess emissions -- Enforcement Activities [c]	24	1	24	0.1	2.4	0.12	0.24	$124.38
C. Create Information	N/A							
D. Gather Information	N/A							
E. Report Reviews								
1) Review waste management plan and siting analysis [b]	8	1	8	1	8	0.4	0.8	$414.60
2) Review report submitted prior to initial startup [b]	2	1	2	1	2	0.1	0.2	$103.65
3) Review initial stack test report [b]	40	1	40	1	40	2	4	$2,072.98
4) Review annual compliance report [d]	8	1	8	4	32	1.6	3.2	$1,658.38
5) Review semi-annual excess emission and parameter exceedance report [c, d]	16	1	16	0.4	6.4	0.32	0.64	$331.68
6) Review status reports and corrective action summary for operators off-site [e]	4	3	12	0.4	4.8	0.24	0.48	$248.76
F. Prepare annual summary report	200	1	200	1	200	10	20	$10,364.90
TOTAL ANNUAL BURDEN AND COST (rounded)					**351**			**$15,817**

Assumptions:

a. Assumes EPA personnel attend 20 percent of the stack tests

b. One-time only costs.

c. Assume that 10 percent of the facilities have an exceedance during the year.

d. Assumes annual costs are not incurred until the second year of operation. For this ICR, assumes the average number of respondents incurring costs during

the 3 year period is 4 (see "Miscellaneous").
e. Assumed that 10 percent of the facilities would not have a qualified operator for more than two weeks at least once a year. Assumed that 1 status report and 2 corrective action summaries are submitted.