

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal), EPA ICR Number 2403.03, OMB Control Number 2060-0661

1(b) Short Characterization/Abstract

The Emission Guidelines for Sewage Sludge Incinerators (SSI) were proposed on October 14, 2010, and promulgated on March 21, 2011. These regulations apply to the administrators of air quality programs in a state or U. S. protectorate with one or more SSI units that commenced construction on or before the date of proposal. States may choose to incorporate the model rule text directly in their state plan. If a State does not develop, adopt, and submit an approvable State plan, the Environmental Protection Agency (EPA) must develop a Federal plan to implement the emission guidelines. These regulations do not directly apply to SSI unit owners and operators. However, SSI unit owners and operators must comply with the state plan developed to implement the emission guidelines contained in this subpart. This ICR presents the burden to respondents (owners or operators of SSI units) and the Designated Administrator (either state or Federal government) that will be imposed by State plans developed to implement the emission guidelines. This information is being collected to assure compliance with 40 CFR part 60, subpart M.

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

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

Sewage Sludge Incinerators are categorized into fluidized bed or multiple hearth units. For fluidized bed SSI units, 60 units at 42 facilities will be affected by the standards. For multiple hearth SSI units, 144 units at 69 facilities will be affected. Because one of these facilities has both a multiple hearth and a fluidized bed unit, the total respondent universe

includes 204 units at 110 facilities. These standards only affect existing units constructed on or before October 14, 2010; therefore, no new units will become subject.

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 existing SSI units. Approximately 98 percent of the respondents are in the public sector (108 respondents), while the remaining two percent are in the private sector (2 respondents). The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M MMM) (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 – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M MMM) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 111(d)(1) of the Clean Air Act (CAA), as amended, to:

. . . prescribe regulations which shall establish a procedure similar to that provided by section 110 under which each State shall submit to the Administrator a plan which (A) establishes standards of performance for any existing source for any air pollutant (i) for which air quality criteria have not been issued or which is not included on a list published under section 108(a) . . . but (ii) to which a standard of performance under this section would apply if such existing source were a new source, and (B) provides for the implementation and enforcement of such standards of performance.

The EPA is required under section 129 of the Act, to establish guidelines for existing stationary sources that reflect the maximum achievable control technology (MACT) for achieving continuous emission reductions:

Section 129(a)(1)(A) states:

The Administrator shall establish performance standards and other requirements pursuant to section 111 and this section for each category of solid waste incineration units. Such standards shall include emissions limitations and other requirements applicable to

new units and guidelines (under section 111(d) and this section) and other requirements applicable to existing units.

Section 129(a)(2) states:

Standards applicable to solid waste incineration units promulgated under section 111 and this section shall reflect the maximum degree of reduction in emissions of air pollutants listed under section (a)(4) that the Administrator, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable for new or existing units in each category.

Section 129(b)(1) states:

Performance standards under this section and section 111 for solid waste incineration units shall include guidelines promulgated pursuant to section 111(d) and this section applicable to existing units. Such guidelines shall include, as provided in this section, each of the elements required by subsection (a) (emissions limitations, notwithstanding any restriction in section 111(d) regarding issuance of such limitations), subsection (c) (monitoring), subsection (d) (operator training), subsection (e) (permits), and subsection (h)(4) (residual risk).

Subpart B of 40 CFR part 60 requires State plans to include monitoring, recordkeeping, and reporting provisions consistent with the emission guidelines. In addition, section 114(a)(1) states that:

the Administrator may require any person who owns or operates any emission source, who manufactures emission control equipment or process equipment, who the Administrator believes may have information necessary for the purposes set forth in this subsection, or who is subject to any requirement of this Act (other than a manufacturer subject to the provisions of section 206(c) or 208 with respect to a provision of title II) on a one-time, periodic or continuous basis to -

- (A) establish and maintain such records;
- (B) make such reports;
- (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods;
- (D) sample such emissions (in accordance with such

procedures or methods, at such locations, at such intervals, during such periods and in such manner as the Administrator shall prescribe);
(E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical;
(F) submit compliance certifications in accordance with section 114(a)(3); and
(G) provide such other information, as the Administrator may reasonably require;

Certain reports are necessary to enable a Designated Administrator to identify existing sources subject to the State plan that implements the emission guidelines and to determine if the standards are being achieved.

2(b) Practical Utility/Users of the Data

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

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission 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 is being met. The performance test may also be observed.

The required annual 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 MMMM.

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate regional office of the EPA. 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 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 these standards as they were being developed and these standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the National Association of Clean Water Agencies (NACWA), at (202) 833-2672; and 2) the American Chemistry Council, at (202) 249-7000.

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 Data Collection

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

3(e) General Guidelines

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

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, the 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 SSI units. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards are SIC 4952 for Sewage Systems and SIC 4941 for Water Supply, which correspond to the North American Industry Classification System (NAICS) code 22132 for Sewage Treatment Facilities and 22131 for Water Supply and Irrigation Systems.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M).

A source must make the following reports:

Notifications/Reports	
Increments of progress report	60.5235(a)
Initial compliance report including initial performance test result, CMS	60.5235(b)

Notifications/Reports	
performance evaluation, site-specific operating limits, documentation of installation of bag leak detection system for fabric filter, and results of air pollution control device inspection	
Annual compliance report	60.5235(c)
Deviation reports	60.5235(d)
Notification of a force majeure	60.5235(f)
Notification for intent to start or stop use of a CMS	60.5235(g)
Notification of intent to conduct a performance test	60.5235(g)
Notification of intent to reschedule a performance test	60.5235(g)

A source must keep the following records:

Recordkeeping	
5-year retention of records.	60.5230
Calendar date of each record.	60.5230(a)
Records of increments of progress. Includes copies of the final control plan and any additional notifications.	60.5230(b)
Records of site-specific information and incinerator operation procedures.	60.5230(c)(1)
Records of names of persons who have completed review of the site-specific information and incinerator operating procedures in 60.5230(c)(1).	60.5230(c)(2)
Records of names of persons who have completed the operator training requirements. Includes documentation of the training and the dates of the training.	60.5230(c)(2)
Records showing the periods when no qualified operators were accessible for more than 8 hours, but less than two weeks.	60.5230(c)(3)
Records showing the periods when no qualified operators were accessible for two weeks or more.	60.5230(c)(4)
Records of control device inspections.	60.5230(d)
Records of initial performance tests, annual performance tests, and any subsequent performance tests.	60.5230(e)
Records of all continuous monitoring data; includes continuous emissions monitors, continuous automated sampling systems, and continuous parameter monitors.	60.5230(f)
Records of other info for continuous monitoring systems.	60.5230(g)
Records of days when a deviation from the operating limits have occurred. Includes a description of the deviation and a description of the corrective actions taken.	60.5230(h)

Recordkeeping	
Equipment vendor specifications for the incinerator, emission controls, and monitoring equipment.	60.5230(i)
Records of calibration of any monitoring devices.	60.5230(j)
Records of monitoring plan and performance evaluations.	60.5230(k)
Records of less frequent testing.	60.5230(l)
Records of use of bypass stack.	60.5230(m)

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, CO, PM, or for continuous parameter monitoring (including CEMS).
Perform initial performance test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.

Respondent Activities
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. The 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

Based on Small Business Administration guidelines, approximately 18 small (i.e., small businesses) entities are affected by this rule. The EPA does not expect the standards to have a significant small business impact.

The EG does not contain any provisions reserved exclusively for the benefit of small entities. However, the EG 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).

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 – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (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. 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 29,116 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 emission guidelines, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$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 monitors and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Fluidized Bed						
PBS parameter monitors	\$24,300	0	\$0	\$5,600	6	\$33,600
SNCR monitors	\$10,300	0	\$0	\$3,200	2	\$6,400
Initial and annual stack test	\$61,740	0	\$0	\$21,348	60	\$1,280,880
Multiple Hearth						
PBS parameter monitors	\$24,300	0	\$0	\$5,600	10	\$56,000
Initial and annual stack test	\$61,740	0	\$0	\$23,302	144	\$3,355,488
Total			\$0			\$4,732,368

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$4,732,368. 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 \$4,732,368. 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 \$275,760.

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 – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (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 110 existing respondents (facilities) will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 110 per year. This estimate includes 42 respondents with 60 fluidized bed SSI units and 69 respondents with 144 multiple hearth SSI units. One respondent (facility) has both a fluidized bed and a multiple hearth unit.

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	0	110	0	0	110
2	0	110	0	0	110
3	0	110	0	0	110
Average	0	110	0	0	110

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

Although column D is subtracted to avoid double-counting respondents, the average Number of Respondents over the three-year period of this ICR is 110, as shown above.

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
Annual Stack Test ¹	204	1	0	204
Annual Compliance Report ¹	204	1	0	204
Status Report ²	11	1	0	11
Corrective Action Summary ²	11	2	0	22
Semi Annual Deviation Report ³	11	2	0	22
			Total	463

¹Based on the number of SSI units

² Assumed that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year. We assumed that this required only two corrective action summaries.

³ Assumed that 10 percent of the facilities would have an exceedance during the year.

The number of Total Annual Responses is 463.

The total annual labor costs are \$2,848,022. Details regarding these estimates may be

found below in Table 1: Annual Respondent Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 29,116 hours at a cost of \$2,848,022. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 63 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$4,732,368. 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 5,169 labor hours at a cost of \$275,760. See below Table 2: Average Annual EPA Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal).

6(f) Reasons for Change in Burden

There is an adjustment decrease in the total estimated respondent burden compared with the ICR currently-approved by OMB. The decrease occurred because the standard has been in effect for more than three years and the requirements are different during initial compliance as compared to any on-going compliance. The previous ICR reflected those burdens and costs associated with the initial activities for subject facilities. This includes purchasing monitoring equipment, conducting performance test(s) and establishing recordkeeping systems. This ICR, by in large, reflects the on-going burden and costs which include continuously monitoring of pollutants and the submission of annual reports. However, note there is an adjustment increase in the total respondent costs due to an increase in labor rates.

In addition, there is a slight increase in the Agency cost due to a correction in travel expense. This ICR corrects the number of hours required for observing each stack test from 30 hours to 48 hours in order to be consistent with Table 2, Burden Item 3A.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 63 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-2013-0311. 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-2013-0311 and OMB Control Number 2060-0661 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 – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal)

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondents Per Year	(E) Technica l 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. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Read and Understand Rule Requirements ^{a,b,i}	40	1	40	0	0	0	0	\$0
B. Required Activities						0	0	
1) Initial stack test and report ^a	40	1	40	0	0	0	0	\$0
2) Annual stack test and test report ^{c,k}	40	1	40	204	8,160	408	816	\$917,918.40
3) Operator training and qualification								
a) Establish and teach operator qualification course ^{a,b}	64	1	64	0	0	0	0	\$0
b) Obtain operator qualification ^{a,b}	72	1	72	0	0	0	0	\$0
c) Annual refresher course ^{c,j}	12	1	12	110	1,320	66	132	\$148,486.80
d) Initial review of site-specific information	Incl. in a.							
e) Annual review of site-specific information ^{c,j}	8	1	8	110	880	44	88	\$98,991.20
4) Establish operating parameters (maximum and minimum) ^a	40	1	40	0	0	0	0	\$0
5) Continuous parameter monitoring (including CEMS)								
a) Initial monitoring	0	1	0	0	0	0	0	\$0
b) Annual monitoring	11	1	11	204	2,244	112.2	224.4	\$252,427.56
C. Create Information	Incl. in 3.B							
D. Gather Information	Incl. in 3.E							
E. Report Preparation								
1) Notification of initial performance test	2	1	2	0	0	0	0	\$0
2) Notification of initial CMS Demonstration ^{b,j}	2	1	2	0	0	0	0	\$0
3) Final Control Plan	20	1	20	0	0	0	0	\$0
4) Initial Compliance Report	40	1	40	0	0	0	0	\$0
5) Report for site-specific parameter petition ^{a,f}	14	1	14	0	0	0	0	\$0
6) Annual Compliance Report	40	1	40	204	8,160	408	816	\$917,918.40
7) Status report for operators that are off-site for more than 2 weeks ^g	8	1	8	11	88	4.4	8.8	\$9,899.12
8) Corrective action summary for operators that are off-site for more than 2 weeks ^g	8	2	16	11	176	8.8	17.6	\$19,798.24

9) Semiannual Deviation Report ^h	24	2	48	11	528	26.4	52.8	\$59,394.72
10) Affirmative Defense	30	1	30	0	0	0	0	\$0
Subtotal for Reporting Requirements						24,789.4		\$2,424,834.44
4. Recordkeeping Requirements								
A. Read Instructions	Incl. in 3.A							
B. Plan Activities	N/A							
C. Implement Activities	N/A							
D. Develop Record System	N/A							
E. Record Information								
1) Records of operating parameters	2	52	104	0	0	0	0	\$0
2) Records of exceedances of the operating parameters ^g	2	1	2	11	22	1.1	2.2	\$2,474.78
3) Records of stack tests	2	1	2	110	220	11	22	\$24,747.80
4) Records of persons who have reviewed operating procedures ^j	2	1	2	110	220	11	22	\$24,747.80
5) Records of persons who have completed operator training ^j	2	1	2	110	220	11	22	\$24,747.80
6) Records of persons who meet operator qualification criteria ^j	2	1	2	110	220	11	22	\$24,747.80
7) Records of monitoring device calibration	2	1	2	110	220	11	22	\$24,747.80
8) Records of site-specific documentation ^j	24	1	24	110	2,640	132	264	\$296,973.60
F. Personnel Training	Incl. in 3.B							
G. Time for Audits	N/A							
Subtotal for Recordkeeping Requirements						4,326.3		\$423,187.38
TOTAL ANNUAL BURDEN AND COST (rounded)						29,116		\$2,848,022

Assumptions:

^a This is a one-time only costs.

^b Cost incurred by a facility regardless of the number of affected units at the plant.

^c Annual costs are not incurred until the second year of operation.

^d Based on the sum of the total capital costs for each monitoring system required for incinerators.

^e Based on the sum of the annualized capital costs for each monitoring system required for incinerators.

^f Assumed that none of the facilities will petition for site-specific parameters.

^g 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

^h Assumed that 10 percent of the facilities would have an exceedance during the year.

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

^j We have assumed that there are 110 facilities.

^k 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 – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (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	40	1	40	0	0	0	0	\$0
3. Required Activities								
A. Observe stack tests ^a	48	1	48	40.8	1,958.4	97.92	195.84	\$101,493.10
B. Excess emissions -- Enforcement Activities ^b	24	1	24	11	264	13.2	26.4	\$13,681.67
C. Create Information	N/A							
D. Gather Information	N/A							
E. Report Reviews								
1) Review initial notifications	20	1	20	0	0	0	0	\$0
2) Review initial compliance report	40	1	40	0	0	0	0	\$0
3) Review annual compliance report	8	1	8	204	1,632	81.6	163.2	\$84,577.58
4) Review semi-annual excess emission and parameter exceedance report ^b	16	2	32	11	352	17.6	35.2	\$18,242.22
5) Review status reports and corrective action summary for operators off-site ^c	4	2	8	11	88	4.4	8.8	\$4,560.56
F. Prepare annual summary report	200	1	200	1	200	10	20	\$10,364.90
5. Travel expenses: (1 person * 48 hours per trip / 8 hours per day * \$75 per diem) + (\$600 per round trip) = \$1,050 per trip (\$1,050 per trip x 40.8 trips) = \$42,840								\$42,840.00
TOTAL ANNUAL BURDEN AND COST (rounded)						5,169		\$275, 760

Assumptions

^a We assume that EPA personnel attends 20 percent of the stack tests (204 respondents per year x 1 stack test/respondent x 20%) = 40.8 stack tests per year.

^b We assume that 10 percent of the facilities would have an exceedance during the year.

^c We assume that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year. We assume that this will require only two corrective action summaries.