

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**Emission Guidelines for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart DDDD) (Renewal)**

**1. Identification of the Information Collection**

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

Emission Guidelines for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart DDDD) (Renewal), EPA ICR Number 2385.06, OMB Control Number 2060-0664.

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

The Emission Guidelines for Commercial and Industrial Solid Waste Incineration (CISWI) Units were proposed on April 29, 2010, promulgated on March 21, 2011 (76 FR 15769) and amended on February 7, 2013 (78 FR 9195). The Emission Guidelines revise the existing 2000 rule, and do not apply directly to CISWI unit owners and operators. The guidelines can be thought of as model regulations that States use in developing State plans to implement the emission guidelines. 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. Existing CISWI units are units that commenced construction on or before the date of proposal. This information is being collected to assure compliance with 40 CFR part 60, subpart DDDD.

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 the 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 United States Environmental Protection Agency (EPA) regional office.

Over the next three years, we estimate that 57 existing facilities (respondents) with 82 CISWI units per year will be subject to the standard, and no additional respondents per year will become subject to the standard.

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 CISWI units who will be affected by the State Plan. The burden to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost – Emission Guidelines for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart DDDD) (Renewal). The Designated Administrator refers to the person or office designated by each State plan to administer and implement the plan, or to the U.S. EPA Administrator in the event that a State’s plan is not approvable and a Federal plan must be developed. Their burden is attributed entirely to work performed by state employees, federal employees, or government contractors, and is presented in Table 2: Average Annual EPA Burden and Cost – Emission Guidelines for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart DDDD) (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 Administer to identify existing sources subject to the State plan that implements the emission guidelines and the determine if the standards are being achieved.

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

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which where 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, 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 DDDD.

### **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, no duplication 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 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.

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 the National Waste & Recycling Association at (202) 364-3724, the Portland Cement Association at [aozare@cement.org](mailto:aozare@cement.org), and the Energy Recovery Council at (202) 467-6240.

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 the Part 70 permit program and the five year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five

years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

### **3(f) Confidentiality**

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (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 existing CISWI units. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standard, and the corresponding North American Industry Classification System (NAICS) codes are listed below.

<b>Standard (40 CFR Part 60, Subpart DDDD)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Wood Product Manufacturing	NA	321
Chemical Manufacturing	NA	325
Wholesale Trade, Durable Goods	NA	421
Furniture and Related Product Manufacturing	NA	337

### **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 Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart DDDD) (Renewal).

A source must make the following reports:

<b>Notifications / Reports</b>	
Submit final control plan	60.2600(a)
Submit notification of final compliance	60.2605
Submit waste management plan	60.2755
Report the following information no later than 60 days after the initial performance test: <ul style="list-style-type: none"> <li>- complete test report for the initial performance test results</li> <li>- the values for site-specific operating limits</li> </ul>	60.2760
Closure notification report	60.2615
Report the following information annually: <ul style="list-style-type: none"> <li>- company name and address</li> <li>- certification by responsible official</li> <li>- date of report and beginning and ending dates of reporting period</li> <li>- the values for the site-specific operating parameters</li> <li>- the highest maximum operating parameter and the lowest minimum operating parameter</li> <li>- information on deviations and malfunctions</li> <li>- the results of performance tests conducted during the period, if any</li> <li>- if no deviations or malfunctions occurred during the period, a statement that no exceedances occurred</li> <li>- documentation of periods when all qualified CISWI unit operators were unavailable for more than 8 hours</li> </ul>	60.2765, 60.2770
If a deviation from operating limits or emission limitations occurs, submit a deviation report that includes the following information: <ul style="list-style-type: none"> <li>- date of deviation</li> <li>- the data for that date</li> <li>- the reason for the deviation</li> <li>- the corrective actions that were taken</li> </ul>	60.2775, 60.2780
If all qualified operators are unavailable for more than 2 weeks, submit a notification of the deviation within 10 days and a corrective action summary every 4 weeks	60.2785
If an increment of progress is not met, submit a notification each month until increment is met	60.2595

A source must keep the following records:

<b>Recordkeeping</b>	
5-year retention of records	60.2740

<b>Recordkeeping</b>	
Calendar date of each record.	60.2740(a)
Records of operating parameters.	60.2740(b)
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.	60.2740(e)
Records of initial performance tests, annual performance tests, and any subsequent performance tests.	60.2740(f)
Records of names of persons who have completed review of the site-specific information and incinerator operating procedures in 60.2660(c).	60.2740(g)
Records of names of persons who have completed the operator training requirements. Includes documentation of the training and the dates of the training.	60.2740(h)
Records of phone and/or pager number of persons who have met the operator qualification criteria.	60.2740(i)
Records of calibration of any monitoring devices.	60.2740(j)
Equipment vendor specifications for the incinerator, emission controls, and monitoring equipment.	60.2740(k)
Daily log of quantity and types of waste burned.	60.2740(m)
Records of annual control device inspections.	60.2740(n)
Records of site-specific information and incinerator operation procedures.	60.2660(c)

### 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 0 percent of the respondents use electronic reporting.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
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<b>Respondent Activities</b>
Install, calibrate, maintain, and operate CMS for opacity, O <sub>2</sub> (or CO <sub>2</sub> ), SO <sub>2</sub> , NO <sub>x</sub> , and CO.
Perform initial and annual stack tests for dioxins/furans, cadmium, lead, mercury, particulate matter, opacity, hydrogen chloride, and fugitive ash.
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.

<b>Agency Activities</b>
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 (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**

Based on Small Business Administration guidelines, approximately 6 small businesses are affected by this rule. The EPA does not expect the standards to have a significant small business impact.

The rule does not contain any provisions reserved exclusively for the benefit of small entities. However, the rule does contain several provisions that reduce the impact of the rule on regulated entities, which include small entities. These are: annual performance testing is only required for three pollutants rather than the full ten pollutants included in the initial performance test for some subcategories; operating parameter monitoring is required instead of continuous emissions monitoring systems (CEMS) for some subcategories; the owner or operator is allowed to skip two annual performance tests for a pollutant if all performance tests over the previous 3 years show compliance within a certain threshold of the emission limit; and deviation reports are only required if there is a deviation, otherwise reporting is annual.

#### **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 Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart DDDD) (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. Where 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 7,378 (Total Labor Hours from Table 1a through 1e, and 1f – Summary of Respondents Burden and Cost 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	\$122.56 (\$58.36+ 110%)
Technical	\$56.32 (\$26.82 + 110%)
Clerical	\$35.11 (\$16.72 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2012, National Industry-Specific Occupational Employment and Wage Estimates. These are average rates for the following sectors: Pulp, Paper and paperboard Mills; Pipeline Transportation; Cement and Concrete Product Manufacturing; Pharmaceutical & Medicine Manufacturing. 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(s) and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(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)
Annual stack test						
- Incinerator	NA			\$55,200	3	\$165,600
- ERU, solid	NA			\$55,200	22	\$1,214,400
- small remote incinerator	NA			\$55,200	28	\$1,545,600
- ERU, liquid	NA			\$55,200	6	\$331,200
- cement kiln	NA			\$40,867	23	\$939,933
CMS <sup>1</sup>						
- Incinerator	NA			\$13,167	3	\$39,500
- ERU, solid	NA			\$43,218	22	\$950,794
- small remote incinerator	NA			\$5,736	28	\$160,600
- ERU, liquid	NA			\$10,467	6	\$62,800
- cement kiln	NA			\$124,361	23	\$2,860,300
Photocopy and postage						
- annual report	NA			\$7.50	82	\$615
- semiannual report	NA			\$7.50	8.2	\$61.50
<b>TOTAL</b>						<b>\$8,271,404</b>

NA – not applicable

<sup>1</sup> Calculated based on the number of CMS units. O&M cost per respondent for CMS is calculated by dividing total O&M cost by the number of respondents for that sector.

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

The total operation and maintenance (O&M) costs for this ICR are \$8,271,404. 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 \$8,271,404. 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

\$66,460.

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 Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart DDDD) (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 57 existing respondents (facilities) with 82 CISWI units 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 57 per year. The total estimated number of respondents consists of 3 incinerators at 3 facilities, 22 solid energy recovery units at 13 facilities, 28 small remote incinerators at 24 facilities, 6 liquid/gas energy recovery units at 4 facilities, and 23 cement kilns at 13 facilities.

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 <sup>1</sup>	(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	57	0	0	57
2	0	57	0	0	57
3	0	57	0	0	57
Average	0	57	0	0	57

<sup>1</sup> New respondents 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 57.

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
(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 initial performance test	0	1	0	0
Notification of initial CMS demonstration	0	1	0	0
Report of initial performance test	0	1	0	0
Report of initial CMS demonstration	0	1	0	0
Report prior to construction	0	1	0	0
Report prior to initial start-up	0	1	0	0
Report of initial stack test	0	1	0	0
Report to establish values for site-specific operating parameters	0	1	0	0
Waste management plan	0	1	0	0
Annual report of performance test results	82	1	0	82
Status report for operators that are off-site for more than 2 weeks	8.2	1	0	8.2
Corrective action summary for operators that are off-site for more than 2 weeks	8.2	2	0	16.4
Semiannual report of exceedance	8.2	1	0	8.2
			Total	114.8

The number of Total Annual Responses is 115 (rounded).

The total annual labor costs are \$423,197. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – Emission Guidelines for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart DDDD) (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 7,378 at a cost of \$423,197. Details regarding these estimates may be found below in Table 1a through 1e, and 1f – Summary of Respondents Burden and Cost. Annual Respondent Burden and Cost – Emission Guidelines for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart DDDD) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 64 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$8,271,404. 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 1,475 labor hours at a cost of \$66,460. See below in Table 2: Average Annual EPA Burden and Cost – Emission Guidelines for Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR Part 60, Subpart DDDD) (Renewal).

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

The decrease in burden from the most recently approved ICR is due to an adjustment. The change in the burden and cost estimates occurred because the standard has been in effect for more than three years and the requirements are different during initial compliance as compared to 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 tests and establishing recordkeeping systems. This ICR, by in large, reflects the on-going burden and costs for existing facilities. Activities for existing source include continuously monitoring of pollutants and the submission of annual performance test results and semiannual reports of exceedances. The overall result is a decrease in burden hours and labor costs. However, there is an increase in the total O&M costs as this ICR reflects the burden associated with annual performance testing requirement of the Emission Guidelines.

In addition to the changes above, this ICR revises the number of respondents using the latest Agency estimates, and corrects the number of responses as the previous ICR incorrectly included internal records as a response. This attributes to a decrease in the number of respondents and number of responses.

## **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 64 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-2013-0312. 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), EPA 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) 566-1927. 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-2013-0312 and OMB Control Number 2060-0664 in any correspondence.

## **Part B of the Supporting Statement**

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







D. Develop Record System	N/A							
E. Record Information								
1) Records of operating parameters	See 3.B.5.b	52	0	0	0	0	0	\$0
2) Records of periods for which minimum amount of data on operating parameters were not obtained (k)	0.5	52	26	0	0	0	0	\$0
3) Records of malfunction of the unit (k)	1.5	1	1.5	0	0	0	0	\$0
4) Records of exceedances of the operating parameters (j)	1.5	1	1.5	0.3	0.45	0.02	0.05	\$29.68
5) Records of stack tests	See 3.E							
6) Records of siting analysis	See 3.E							
7) Records of persons who have reviewed operating procedures	1	1	1	3	3	0.15	0.3	\$197.88
8) Records of persons who have completed operator training	1	1	1	3	3	0.15	0.3	\$197.88
9) Records of persons who meet operator qualification criteria	1	1	1	3	3	0.15	0.3	\$197.88
10) Records of monitoring device calibration	See 3.B							
11) Records of site-specific documentation	24	1	24	3	72	3.6	7.2	\$4,749.17
F. Personnel Training	See 3.B							
G. Time for Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>94</b>		<b>\$5,373</b>
<b>TOTAL ANNUAL BURDEN AND COSTS (rounded)</b>						<b>376</b>		<b>\$21,559</b>

## FOOTNOTES

- a Based on the total number of existing units expected to continue operating once the guidelines become effective.
- b Costs are based on the following hourly rates: technical at \$34.60, management at \$82.23, clerical at \$22.32, and testing contractor at \$80.
- 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 Based on the sum of the annualized capital costs for each monitoring system required for incinerators.
- g Based on the sum of the calculated annual cost for each monitoring system required for incinerators.
- h Assumed that one-third of the facilities will petition for site-specific parameters.
- i 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.
- j Assumed that 10 percent of the facilities would have an exceedance during the year.
- k Standards apply at all times under the newly proposed regulation. Therefore no periods of unobtained data or malfunction periods are expected.
- l Assumed \$100 for purchase of filing cabinet to house copy of rule, records and report copies.
- m Assumed no affirmative defense claims would be filed in the first three years after promulgation. If a source were to meet the notification, reporting, and recordkeeping requirements of affirmative defense, it would be approximately 30 hours or around \$3,100 in labor burden.



1) Notification of initial performance test								
a) Pollutants, fugitive ash emissions	2	1	2	0	0	0	0	\$0
b) Fugitive Ash Emissions	1	1	1	0	0	0	0	\$0
2) Notification of initial CMS Demonstration	2	1	2	0	0	0	0	\$0
3) Report of initial performance test								
a) Pollutants, fugitive ash emissions	8	1	8	0	0	0	0	\$0
b) Fugitive Ash Emissions	2	1	2	0	0	0	0	\$0
4) Report of initial CMS demonstration	See 3.B.5							
5) Report prior to construction (includes siting analysis) <sup>c</sup>	160	1	160	0	0	0	0	\$0
6) Report prior to initial start-up <sup>c, h</sup>								
a) Without site specific parameter petition	6	1	6	0	0	0	0	\$0
b) With site specific parameter petition	14	1	14	0	0	0	0	\$0
7) Report of initial stack test	See 3.B.1							
8) Report established values for site-specific operating parameters <sup>c</sup>	See 3.B	1	0	0	0	0	0	\$0
9) Waste management plan <sup>c</sup>	160	1	160	0	0	0	0	\$0
10) Annual Report:								
a) Results of performance tests conducted during the year	40	1	40	22	880	44	88	\$58,045.45
11) Status report for operators that are off-site for more than 2 weeks <sup>i</sup>	8	1	8	2.2	17.6	0.88	1.76	\$1,160.91
12) Corrective action summary for operators that are off-site for more than 2 weeks <sup>i</sup>	8	2	16	2.2	35.2	1.76	3.52	\$2,321.82
13) Semiannual report of emissions/parameter exceedances <sup>i</sup>	24	1	24	2.2	52.8	2.64	5.28	\$3,482.73
F. Affirmative Defense Claim <sup>m</sup>	30	0	0	0	0	0	0	\$0
<b>Subtotal for Reporting Requirements</b>						<b>1,432</b>		<b>\$82,161</b>
4. Recordkeeping Requirements								
A. Read Instructions	See 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	See 3.B.5.b	52	0	0	0	0	0	\$0
2) Records of periods for which minimum amount of data on operating parameters were not obtained <sup>k</sup>	0.5	52	26	0	0	0	0	\$0
3) Records of malfunction of the unit <sup>k</sup>	1.5	1	1.5	0	0	0	0	\$0
4) Records of exceedances of the operating parameters <sup>j</sup> (j)	1.5	1	1.5	2.2	3.3	0.17	0.33	\$217.67
5) Records of stack tests	See 3.E							
6) Records of siting analysis	See 3.E							
7) Records of persons who have reviewed operating procedures	1	1	1	13	13	0.65	1.3	\$857.49
8) Records of persons who have completed operator training	1	1	1	13	13	0.65	1.3	\$857.49
9) Records of persons who meet operator qualification criteria	1	1	1	13	13	0.65	1.3	\$857.49
10) Records of monitoring device calibration	See 3.B							
11) Records of site-specific documentation	24	1	24	13	312	15.6	31.2	\$20,579.75
F. Personnel Training	See 3.B							
G. Time for Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>407</b>		<b>\$23,370</b>
<b>TOTAL ANNUAL BURDEN AND COSTS (rounded)</b>						<b>1,840</b>		<b>\$105,531</b>

## FOOTNOTES

- a Based on the total number of existing units expected to continue operating once the guidelines become effective.
- b Costs are based on the following hourly rates: technical at \$34.60, management at \$82.23, clerical at \$22.32, and testing contractor at \$80.
- 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 Based on the sum of the annualized capital costs for each monitoring system required for incinerators.
- g Based on the sum of the calculated annual cost for each monitoring system required for incinerators.
- h Assumed that one-third of the facilities will petition for site-specific parameters.
- i 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.

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

k Standards apply at all times under the newly proposed regulation. Therefore no periods of unobtained data or malfunction periods are expected.

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

m Assumed no affirmative defense claims would be filed in the first three years after promulgation. If a source were to meet the notification, reporting, and recordkeeping requirements of affirmative defense, it would be approximately 30 hours or around \$3,100 in labor burden.







1) Records of operating parameters	See 3.B.5.b	52	0	0	0	0	0	\$0
2) Records of periods for which minimum amount of data on operating parameters were not obtained <sup>k</sup>	0.5	52	26	0	0	0	0	\$0
3) Records of malfunction of the unit <sup>k</sup>	1.5	1	1.5	0	0	0	0	\$0
4) Records of exceedances of the operating parameters <sup>j</sup>	1.5	1	1.5	2.8	4.2	0.21	0.42	\$277.04
5) Records of stack tests	See 3.E							
6) Records of siting analysis	See 3.E							
7) Records of persons who have reviewed operating procedures	1	1	1	24	24	1.2	2.4	\$1,583.06
8) Records of persons who have completed operator training	1	1	1	24	24	1.2	2.4	\$1,583.06
9) Records of persons who meet operator qualification criteria	1	1	1	24	24	1.2	2.4	\$1,583.06
10) Records of monitoring device calibration	See 3.B							
11) Records of site-specific documentation	24	1	24	24	576	28.8	57.6	\$37,993.38
F. Personnel Training	See 3.B							
G. Time for Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>750</b>		<b>\$43,020</b>
<b>TOTAL ANNUAL BURDEN AND COSTS (rounded):</b>						<b>2,745</b>		<b>\$157,422</b>

## FOOTNOTES

- <sup>a</sup> Based on the total number of existing units expected to continue operating once the guidelines become effective.
- <sup>b</sup> Costs are based on the following hourly rates: technical at \$34.60, management at \$82.23, clerical at \$22.32, and testing contractor at \$80.
- <sup>c</sup> One-time only costs.
- <sup>d</sup> Cost incurred by a facility regardless of the number of affected units at the plant.
- <sup>e</sup> Annual cost. Annual costs are not incurred until the second year of operation.
- <sup>f</sup> Based on the sum of the annualized capital costs for each monitoring system required for incinerators.
- <sup>g</sup> Based on the sum of the calculated annual cost for each monitoring system required for incinerators.
- <sup>h</sup> Assumed that one-third of the facilities will petition for site-specific parameters.
- <sup>i</sup> 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.
- <sup>j</sup> Assumed that 10 percent of the facilities would have an exceedance during the year.
- <sup>k</sup> Standards apply at all times under the newly proposed regulation. Therefore no periods of unobtained data or malfunction periods are expected.
- <sup>l</sup> Assumed \$100 for purchase of filing cabinet to house copy of rule, records and report copies.

- m Assumed no affirmative defense claims would be filed in the first three years after promulgation. If a source were to meet the notification, reporting, and recordkeeping requirements of affirmative defense, it would be approximately 30 hours or around \$3,100 in labor burden.



1) Notification of initial performance test								
a) Pollutants, fugitive ash emissions	2	1	2	0	0	0	0	\$0
b) Fugitive Ash Emissions	1	1	1	0	0	0	0	\$0
2) Notification of initial CMS Demonstration	2	1	2	0	0	0	0	\$0
3) Report of initial performance test								
a) Pollutants, fugitive ash emissions	8	1	8	0	0	0	0	\$0
b) Fugitive Ash Emissions	2	1	2	0	0	0	0	\$0
4) Report of initial CMS demonstration	See 3.B.5							
5) Report prior to construction (includes siting analysis) <sup>c</sup>	160	1	160	0	0	0	0	\$0
6) Report prior to initial start-up <sup>c, h</sup>								
a) Without site specific parameter petition	6	1	6	0	0	0	0	\$0
b) With site specific parameter petition	14	1	14	0	0	0	0	\$0
7) Report of initial stack test	See 3.B.1							
8) Report established values for site-specific operating parameters (c)	See 3.B	1	0	0	0	0	0	\$0
9) Waste management plan <sup>c</sup>	160	1	160	0	0	0	0	\$0
10) Annual Report:								
a) Results of performance tests conducted during the year	40	1	40	6	240	12	24	\$15,830.58
11) Status report for operators that are off-site for more than 2 weeks <sup>i</sup>	8	1	8	0.6	4.8	0.24	0.48	\$316.61
12) Corrective action summary for operators that are off-site for more than 2 weeks <sup>i</sup>	8	2	16	0.6	9.6	0.48	0.96	\$633.22
13) Semiannual report of emissions/parameter exceedances <sup>j</sup>	24	1	24	0.6	14.4	0.72	1.44	\$949.83
F. Affirmative Defense Claim <sup>m</sup>	30	0	0	0	0	0	0	\$0
<b>Reporting Subtotal</b>						<b>401</b>		<b>\$23,007</b>
4. Recordkeeping Requirements								
A. Read Instructions	See 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	See 3.B.5.b	52	0	0	0	0	0	\$0
2) Records of periods for which minimum amount of data on operating parameters were not obtained <sup>k</sup>	0.5	52	26	0	0	0	0	\$0
3) Records of malfunction of the unit <sup>k</sup>	1.5	1	1.5	0	0	0	0	\$0
4) Records of exceedances of the operating parameters <sup>j</sup>	1.5	1	1.5	0.6	0.9	0.05	0.09	\$59.36
5) Records of stack tests	See 3.E							
6) Records of siting analysis	See 3.E							
7) Records of persons who have reviewed operating procedures	1	1	1	4	4	0.2	0.4	\$263.84
8) Records of persons who have completed operator training	1	1	1	4	4	0.2	0.4	\$263.84
9) Records of persons who meet operator qualification criteria	1	1	1	4	4	0.2	0.4	\$263.84
10) Records of monitoring device calibration	See 3.B							
11) Records of site-specific documentation	24	1	24	4	96	4.8	9.6	\$6,332.23
F. Personnel Training	See 3.B							
G. Time for Audits	N/A							
<b>Recordkeeping Subtotal</b>						<b>125</b>		<b>\$7,183</b>
<b>TOTAL:</b>						<b>526</b>		<b>\$30,190</b>

## FOOTNOTES

- <sup>a</sup> Based on the total number of existing units expected to continue operating once the guidelines become effective.
- <sup>b</sup> Costs are based on the following hourly rates: technical at \$34.60, management at \$82.23, clerical at \$22.32, and testing contractor at \$80.
- <sup>c</sup> One-time only costs.
- <sup>d</sup> Cost incurred by a facility regardless of the number of affected units at the plant.
- <sup>e</sup> Annual cost. Annual costs are not incurred until the second year of operation.
- <sup>f</sup> Based on the sum of the annualized capital costs for each monitoring system required for incinerators.
- <sup>g</sup> Based on the sum of the calculated annual cost for each monitoring system required for incinerators.
- <sup>h</sup> Assumed that one-third of the facilities will petition for site-specific parameters.
- <sup>i</sup> 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.
- <sup>j</sup> Assumed that 10 percent of the facilities would have an exceedance during the year.
- <sup>k</sup> Standards apply at all times under the newly proposed regulation. Therefore no periods of unobtained data or malfunction periods are

expected.

- <sup>1</sup> Assumed \$100 for purchase of filing cabinet to house copy of rule, records and report copies.
- m Assumed no affirmative defense claims would be filed in the first three years after promulgation. If a source were to meet the notification, reporting, and recordkeeping requirements of affirmative defense, it would be approximately 30 hours or around \$3,100 in labor burden.





1) Notification of initial performance test								
a) Pollutants, fugitive ash emissions	2	1	2	0	0	0	0	\$0
b) Fugitive Ash Emissions	1	1	1	0	0	0	0	\$0
2) Notification of initial CMS Demonstration	2	1	2	0	0	0	0	\$0
3) Report of initial performance test								
a) Pollutants, fugitive ash emissions	8	1	8	0	0	0	0	\$0
b) Fugitive Ash Emissions	2	1	2	0	0	0	0	\$0
4) Report of initial CMS demonstration	See3.B.5							
5) Report prior to construction (includes siting analysis) <sup>c</sup>	160	1	160	0	0	0	0	\$0
6) Report prior to initial start-up <sup>c, h</sup>								
a) Without site specific parameter petition	6	1	6	0	0	0	0	\$0
b) With site specific parameter petition	14	1	14	0	0	0	0	\$0
7) Report of initial stack test	See3.B.1							
8) Report established values for site-specific operating parameters <sup>c</sup>	See3.B	1	0	0	0	0	0	\$0
9) Waste management plan <sup>c</sup>	160	1	160	0	0	0	0	\$0
10) Annual Report:								
a) Results of performance tests conducted during the year	40	1	40	23	920	46	92	\$60,683.88
11) Status report for operators that are off-site for more than 2 weeks <sup>i</sup>	8	1	8	2.3	18.4	0.92	1.84	\$1,213.68
12) Corrective action summary for operators that are off-site for more than 2 weeks <sup>i</sup>	8	2	16	2.3	36.8	1.84	3.68	\$2,427.36
13) Semiannual report of emissions/parameter exceedances <sup>j</sup>	24	1	24	2.3	55.2	2.76	5.52	\$3,641.03
F. Affirmative Defense Claim <sup>m</sup>	30	0	0	0	0	0	0	\$0
<b>Reporting Subtotal</b>						<b>1,484</b>		<b>\$85,116</b>
4. Recordkeeping Requirements								
A. Read Instructions	See3.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	See 3.B.5.b	52	0	0	0	0	0	\$0
2) Records of periods for which minimum amount of data on operating parameters were not obtained <sup>k</sup>	0.5	52	26	0	0	0	0	\$0
3) Records of malfunction of the unit <sup>k</sup>	1.5	1	1.5	0	0	0	0	\$0
4) Records of exceedances of the operating parameters <sup>j</sup>	1.5	1	1.5	2.3	3.45	0.17	0.35	\$227.56
5) Records of stack tests	See 3.E							
6) Records of siting analysis	See 3.E							
7) Records of persons who have reviewed operating procedures	1	1	1	13	13	0.65	1.3	\$857.49
8) Records of persons who have completed operator training	1	1	1	13	13	0.65	1.3	\$857.49
9) Records of persons who meet operator qualification criteria	1	1	1	13	13	0.65	1.3	\$857.49
10) Records of monitoring device calibration	See 3.B							
11) Records of site-specific documentation	24	1	24	13	312	15.6	31.2	\$20,579.75
F. Personnel Training	See 3.B							
G. Time for Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>408</b>		<b>\$23,380</b>
<b>TOTAL:</b>						<b>1,892</b>		<b>\$108,496</b>

## FOOTNOTES

- a Based on the total number of existing units expected to continue operating once the guidelines become effective.
- b Costs are based on the following hourly rates: technical at \$34.60, management at \$82.23, clerical at \$22.32, and testing contractor at \$80.
- 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 Based on the sum of the annualized capital costs for each monitoring system required for incinerators.
- g Based on the sum of the calculated annual cost for each monitoring system required for incinerators.
- h Assumed that one-third of the facilities will petition for site-specific parameters.
- i 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.

j Assumed that 10 percent of the facilities would have an exceedance during the year.  
k Standards apply at all times under the newly proposed regulation. Therefore no periods of unobtained data or malfunction periods are expected.  
l Assumed \$100 for purchase of filing cabinet to house copy of rule, records and report copies.  
m Assumed no affirmative defense claims would be filed in the first three years after promulgation. If a source were to meet the notification, reporting, and recordkeeping requirements of affirmative defense, it would be approximately 30 hours or around \$3,100 in labor burden.

**Table 1f: Summary of Respondent Burden and Cost**

<b>CISWI Unit Type</b>	<b>Reporting Hours</b>	<b>Recordkeeping Hours</b>	<b>Total Hours</b>	<b>Labor Costs</b>
Incinerator	282	94	376	\$21,559
ERU, solid	1,432	407	1,840	\$105,531
Small, remote incinerator	1,995	750	2,745	\$157,422
ERU, liquid/gas	401	125	526	\$30,190
Cement kilns	1,484	408	1,892	\$108,496
<b>Respondent Total</b>	<b>5,594</b>	<b>1,784</b>	<b>7,378</b>	<b>\$423,197</b>

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

Burden Item	(A)		(B)	(C)	(D)	(E)	(F)
	Number of Occurrences Per Year		EPA Hours Per Occurrence	Tech Hours Per Year (C=AxB)	Management Hours Per Year (D=Cx0.05)	Clerical Hours Per Year (E=Cx0.1)	EPA Cost Per Year (a,b)
1. Applications	not applicable						
2. Read and Understand Rule Requirements	0	c	16	0	0	0	\$0
3. Required Activities							
A. Observe initial stack tests (PM, dioxins/furans, opacity, HCl, Cd, Pb, Hg, CO, NOx, and SO2)	0	c, d	48	0	0	0	\$0
B. Excess emissions -- Enforcement Activities	8.2	f	24	196.8	9.84	19.68	\$10,199.06
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews							
1) Review waste management plan and siting analysis	0	c	8	0	0	0	\$0
2) Review report submitted prior to initial startup	0	c	2	0	0	0	\$0
3) Review initial stack test report	0	c	40	0	0	0	\$0
4) Review annual compliance report	82	e	8	656	32.8	65.6	\$33,996.87
5) Review semi-annual excess emission and parameter exceedance report	8.2	f	16	131.2	6.56	13.12	\$6,799.37
6) Review status reports and corrective action summary for operators off-site	24.6	g	4	98.4	4.92	9.84	\$5,099.53
F. Prepare annual summary report	1		200	200	10	20	\$10,364.90
<b>TOTAL</b>				<b>1,475</b>			<b>\$66,460</b>

FOOTNOTES

- a Costs are based on the following hourly rates (loaded with 60% for fringe and overhead): technical at \$52.37, management at \$86.56, clerical at \$29.52.
- b Figures may not add exactly due to rounding.
- c One-time only costs.
- d Assumes EPA personnel attend 20 percent of the initial stack tests.
- e Burden not incurred until second year of operation onward.
- f Assume that 10 percent of the facilities have an exceedance during the year.
- g 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.