

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Municipal Waste Combustors (40 CFR Part 60, Subpart Ea and Eb) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Municipal Waste Combustors (40 CFR Part 60, Subpart Ea and Eb) (Renewal), EPA ICR Number 1506.13, OMB Control Number 2060-0210.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Municipal Waste Combustors were proposed on December 20, 1980 and September 20, 1994, respectively, and promulgated on February 11, 1991 and December 19, 1995 (respectively). These regulations apply to existing and new facilities with a municipal waste combustor unit capacity greater than 225 megagrams per day of municipal solid waste. Municipal waste combustor (MWC) facilities that commenced construction after December 20, 1989 and on or before September 20, 1994, or commenced modification or reconstruction after December 20, 1989 and on or before June 19, 1996, are subject to the regulations in 40 CFR Part 60, Subpart Ea. MWC facilities which commenced construction after September 20, 1994, or commenced modification or reconstruction after June 19, 1996, are subject to the regulations in 40 CFR Part 60, Subpart Eb. This information is being collected to assure compliance with 40 CFR Part 60, Subpart Ea and Eb.

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

Over the next three years, an average of 8 respondents of subpart Ea shall maintain a file of these measurements, and retain the file for at least two years following the date of such measurements, maintenance reports, and records. An average of 5 respondents of subpart Eb 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. We expect one plant (respondent) to startup in 2015 which will become subject to Subpart Eb. No additional respondent per year will become subject during the three year period of this ICR. Information required by the NSPS is necessary to ensure that emission standards are attained and that MWC's are properly operated and maintained.

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

In the United States, there are approximately 13 MWC plants; all of which are privately-owned, for-profit businesses. None of these facilities are owned by state, local, tribal, or the Federal governments. The burden to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost – NSPS for Municipal Waste Combustors (40 CFR Part 60, Subparts Ea and Eb) (Renewal). The “Federal Government” burden is attributed entirely to work performed by federal employees or government contractors and may be found in Table 2: Average Annual EPA Burden and Cost – NSPS for Municipal Waste Combustors (40 CFR Part 60, Subparts Ea and Eb) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

... application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, organic, acid gas, and nitrogen oxide emissions from MWCs cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart Ea and Eb.

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 standards. Continuous emission monitors are used to ensure compliance with the standards 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 standards 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 standards are being met. The performance test may also be observed.

The required quarterly and semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart Ea and Eb.

3(a) Nonduplication

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 (79 FR 30117) on May 27, 2014. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Energy Recovery Council at (202) 467-6240 and the Solid Waste Association of North America at (800) 467-9262.

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 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 MWCs. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below.

Standard (40 CFR Part 60, Subpart Ea and Eb)	SIC Codes	NAICS Codes
Administration of Air and Water Resource and Solid Waste Management	9511	924110
Hazardous Waste Treatment and Disposal	4953	562211
Materials Recovery Facilities	4953	562920
Other Hazardous Waste Treatment and Disposal	4953	562219
Solid Waste Combustors and Incinerators	4953	562213
Solid Waste Landfills	4953	562212

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Municipal Waste Combustors (40 CFR Part 60, Subpart Ea and Eb).

A source must make the following reports:

Notifications	
Notification of construction/reconstruction or modification	60.7(a)(1), 60.59a(a), 60.59b(a-c)
Notification of preconstruction plans and public meeting material	60.59b(a)
Notification of actual startup	60.7(a)(3), 60.59a(a), 60.9b(c)
Notification related to siting analysis	60.59b(a)
Notification of initial performance tests	60.8(d)
Notification of initial performance tests results	60.8(a)
Notification of demonstration of continuous monitoring system	60.7(a)(5)
Notification of physical or operational change	60.7(a)(4)
Notification related to opacity	60.7(a)(6), 60.59b(c)

Reports	
Report on initial performance test results	60.8(a), 60.59a(c), 60.59b(f)
Report on public meeting (notification and transcript)	60.59b(a)(2-3),
Report on responses to public comment	60.59b(a)(4)
Report on preliminary and final draft materials separation plans	60.59b(a)(1)
Report on weights of municipal solid waste and other fuels fired	60.59a(b)(3)
Report on performance tests/compliance report	60.8(a), 60.59a(e), 60.59a(g), 60.59b(g)
Report excess emissions	60.59a(f), 60.59b(h)
Report on continuous emission monitoring system (CEMS) demonstration and test data	60.8(a), 60.59b(f)
Report of emission levels during annual test (if necessary)	60.59b(d)

A source must keep the following records:

Recordkeeping	
Initial performance tests and annual performance tests	60.59b(d)
Records of periodic testing for fugitive ash emissions	60.59b(d)

Recordkeeping	
Startup, shutdown, malfunction periods where the continuous monitoring system is inoperative	60.7(b)
Occurrence, duration of interruption in operation	60.7(b)
Records of sources with continuous monitoring systems	60.59a(i)
Results of daily CEMs drift tests and Appendix F accuracy assessment	60.59b(d)
Amounts of sorbent used for mercury (Hg) control	60.59b(d)
Persons reviewing operating material	60.59a(j), 60.59b(d)
Records are required to be retained for two years (subpart Ea)	60.59a(b)
Records are required to be retained for five years (subpart Eb)	60.59b(d-e)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Method 19 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.

Respondent Activities
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.
Perform site selection analysis.
Hold public meeting on site analysis and material separation plan.

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 quarterly and 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

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. 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 in below Table 1: Annual Respondent Burden and Cost – NSPS for Municipal Waste Combustors (40 CFR Part 60, Subparts Ea and Eb) (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 20,272 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$128.02 (\$60.98 + 110%)
Technical	\$101.05 (\$48.12 + 110%)
Clerical	\$51.37 (\$24.46 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. 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)
CEMs for Subpart Ea	\$60,000	0	\$0	\$8,972	8	\$71,776
CEMs for Subpart Eb	\$60,000	0.33	\$20,000	\$8,972	5	\$44,860
Total			\$20,000			\$116,636

The total capital/startup costs for this ICR are \$20,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$116,636. 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 \$136,636.

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 \$38,853.

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

Managerial	\$62.90 (GS-13, Step 5, \$39.31 + 60%)
Technical	\$46.67 (GS-12, Step 1, \$29.17 + 60%)
Clerical	\$25.25 (GS-6, Step 3, \$15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2014 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NSPS for Municipal Waste Combustors (40 CFR Part 60, Subparts Ea and Eb) (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 13 existing respondents will be subject to the standard. It is estimated that one respondent will become subject to Subpart Eb during the first year of the ICR period, but no additional respondents will become subject. The overall average number of respondents, as shown in the table below, is 13 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1-Ea	0	8	0	0	8
2-Ea	0	8	0	0	8
3-Ea	0	8	0	0	8
Average - Ea	0	8	0	0	8
1-Eb	1	4	0	0	5
2-Eb	0	5	0	0	5
3-Eb	0	5	0	0	5
Average - Eb	0.33	5	0	0	5

¹ 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 13.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of initial performance test for Ea	0	0	N/A	0
Notification of CMS demonstration for Ea	0	0	N/A	0
Compliance reports for Ea	8	1	N/A	8
Opacity reports for Ea (no excess emission)	6.4	1	N/A	6.4
Opacity reports for Ea (excess emission)	1.6	1	N/A	1.6
Report of daily weight of municipal solid waste (MSW) and fuel for Ea	8	4	N/A	32
Appendix F reports for Ea	8	4	N/A	32
Notification of construction/reconstruction for Eb	0.33	1	N/A	0.33
Notification of initial performance test for Eb	0.33	1	N/A	0.33
Notification of CMS demonstration for Eb	0.33	1	N/A	0.33
Initial compliance reports for Eb	0.33	1	N/A	0.33
Annual compliance reports for Eb	5	1	N/A	5
Semiannual excess emission reports Eb	5	2	N/A	10
Appendix F quarterly reports for Eb	5	4	N/A	20
Initial report on site selection analysis for Eb	0.33	1	N/A	0.33
Public meetings and comment responses for Eb	0.33	1	N/A	0.33
			Total	117

The number of Total Annual Responses is 117.

The total annual labor costs are \$1,761,252. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Municipal Waste

Combustors (40 CFR Part 60, Subparts Ea and Eb) (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 below, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 20,272. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NSPS for Municipal Waste Combustors (40 CFR Part 60, Subparts Ea and Eb) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 173 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$136,636. 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 854 labor hours at a cost of \$38,853. See Table 2: Average Annual EPA Burden and Cost – NSPS for Municipal Waste Combustors (40 CFR Part 60, Subparts Ea and Eb) (Renewal).

6(f) Reasons for Change in Burden

There is a decrease in the respondent burden, but an increase in the number of responses and the Agency burden. These changes are due to the following adjustments: 1) The number of sources subject to each Subpart was revised to reflect more recent information obtained through the Agency's research within the MWC sector; 2) the number of sources required to submit initial notification and siting analysis was corrected to reflect this activity as a burden only for new sources, rather than for existing sources; 3) several mathematical errors in calculating burden costs were corrected; and 4) all estimates were updated using more recent labor rates.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 173 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-2014-0045. 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-2014-0045 and OMB Control Number 2060-0210 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NSPS for Municipal Waste Combustors (40 CFR Part 60, Subparts Ea and Eb) (Renewal)

Burden item	(A) Hours per Occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Emission Test Person-Hours per Occurrence	(I) Emission Testing Contractor Person-Hours per Year (HxD) ^c	(J) Total Cost per year ^b
1. Applications	N/A									
2. Survey and Studies	N/A									
3. Reporting requirements										
A. Read instructions	1	1	1	0.33	0.33	0.02	0.03	1	0.33	\$63.55
B. Required activities										
Initial performance test for Eb ^{d,e}	24	1	24	0.33	7.92	0.40	0.79	1,053	347	\$28,690.90
Repeat performance test for Eb ^{f,e}	24	1	24	0.07	1.68	0.08	0.17	1,053	73.71	\$6,085.95
Demonstration/CEMS for Eb	24	1	24	0.33	7.92	0.40	0.79	470	155.1	\$13,299.70
Repeat CEM demonstration Eb ^g	24	1	24	0.07	1.68	0.08	0.17	470	32.9	\$2,821.15
Annual compliance test for Ea ^{h,i}	24	1	24	8	192	9.6	19.2	826	6,608	\$550,256.90
Annual compliance test for Eb ^{j,e}	24	1	24	5	120	6	12	1,053	5,265	\$434,710.56
Appendix F audit for Ea (in-situ)	125	8	1,000	0	0	0	0	0	0	\$0
Appendix F audit for Ea (extractive)	36	8	288	0	0	0	0	0	0	\$0
C. Create Information	See 3B									
D. Gather information	See 3B									
E. Write report										
Notification of construction/reconstruction for Ea	2	1	2	0	0	0	0	0	0	\$0
Notification of actual startup – Ea	2	1	2	0	0	0	0	0	0	\$0
Notification of initial performance test – Ea	2	1	2	0	0	0	0	0	0	\$0
Notification of CMS demonstration –	2	1	2	0	0	0	0	0	0	\$0

Ea										
Notification of construction/reconstruction – Eb	2	1	2	0.33	0.66	0.03	0.07	0	0	\$74.31
Notification of initial performance test – Eb	2	1	2	0.33	0.66	0.03	0.07	0	0	\$74.31
Notification of CMS demonstration – Eb	2	1	2	0.33	0.66	0.03	0.07	0	0	\$74.31
Annual compliance reports for Ea	16	1	16	8	128	6.4	12.8	0	0	\$14,411.26
Annual opacity report of no excess emission for Ea ^k	8	1	8	6.4	51.2	2.56	5.12	0	0	\$5,764.51
Annual opacity report for excess emission for Ea ^l	16	1	16	1.6	25.6	1.28	2.56	0	0	\$2,882.25
Report of daily weight of MSW and fuel for Ea	34	4	136	8	1088	54.4	108.8	0	0	\$122,495.74
Appendix F reports for Ea	11	4	44	8	352	17.6	35.2	0	0	\$39,630.98
Initial compliance report for Eb	40	1	40	0.33	13.2	0.66	1.32	0	0	\$1,486.16
Annual compliance report for Eb	40	1	40	5	200	10	20	0	0	\$22,517.60
Semiannual excess emission report Eb ^m	17	2	34	5	170	8.5	17	0	0	\$19,139.96
Appendix F reports for Eb ⁿ	11	4	44	5	220	11	22	0	0	\$24,769.36
Initial site selection analysis/report for Eb	270	1	270	0.33	89	4.46	8.91	0	0	\$10,031.59
Public meeting and comment response for Eb	140	1	140	0.33	46.2	2.31	4.62	0	0	\$5,201.57
Subtotal for Reporting Requirements						3,124			12,483	\$1,304,482.6
							15,607			
4. Recordkeeping requirements										
A. Read instructions	See 3A									
B. Plan activities	See 4E									
C. Implement activities	See 4E									
D. Develop record system	See 4E									
E. Time to enter information										
Records of SSM for Ea ^o	1.5	104	156	8	1,248	62.4	124.8	0	0	\$140,509.82
Record emission measurements Ea ^o	1.5	104	156	8	1,248	62.4	124.8	0	0	\$140,509.82
Record of employee review of operation for Ea ^p	4	2	8	8	64	3.2	6.4	0	0	\$7,205.63

Record of emission rates, and computation tests for Eb ^a	1.5	94	141	5	705	35.25	70.5	0	0	\$79,374.54
Record of SSM for Eb ^a	1.5	94	141	5	705	35.25	70.5	0	0	\$79,374.54
Record of employee review of operation for Eb ^r	4	2	8	5	40	2	4	0	0	\$4,503.52
Record amount of sorbent for Hg control for Eb	0.1	94	9.4	5	47	2.35	4.7	0	0	\$5,291.64
F. Train personnel	See 4E									
G. Audits	See 4E									
Subtotal for Recordkeeping Requirements						4,666			0	
							4,666			\$456,769.52
TOTAL LABOR BURDEN AND COST							20,272			\$1,761,252.12

Assumptions:

^a We have estimated that an average of 13 sources are subject to subparts Ea and Eb. Eight of these sources are currently subject to subpart Ea, with no additional sources becoming subject to the regulation in the next three years. The remaining five sources are subject to subpart Eb. We have assumed that one additional source will start up in 2015, which is the first year of the ICR renewal period. No additional sources will become subject to Eb.

^b This ICR uses the following labor rates: \$128.02 per hour for Executive, Administrative, and Managerial labor; \$101.05 per hour for Technical labor, and \$51.37 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, Table 2. Civilian Workers, by Occupational and Industry groups. The rates are from column 1, Total Compensation. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c We have estimated that the contractors' rate for emission testing would be \$80.00 per hour.

^d We have assumed that the one new respondent will take 24 hours to perform initial performance test.

^e We have assume that it will take an emission testing contractor 1,053 hours to perform both initial performance test and repeat performance test for subpart Eb.

^f We have assumed that 20 percent of the respondents will repeat performance test for Eb.

^g We have assumed that 20 percent of respondents will repeat CEM demonstration activity for Eb.

^h We have assumed that all of the 8 respondents for subpart Ea will have to complete an annual compliance test.

ⁱ We have assumed that it will take an emission testing contractor 826 hours to complete an annual compliance test for Eb.

^j We have assume that 5 respondents for subpart Eb will have to complete an annual compliance test.

^k We have assumed that 80 percent of respondents will file an opacity report of no excess emission for Ea.

^l We have assumed that 20 percent of respondents will file an opacity report of excess emission for Ea.

^m We have assumed that 5 of the respondents will be required to write semiannual excess emission report for Eb two times per year.

ⁿ We have assumed that 5 of the respondents will write the appendix F reports four times per year.

^o We have assumed that all 8 respondents for subpart Ea will each take 104 hours to complete task.

^p We have assumed that all respondents for subpart Ea will each take 4 hours two times per year to record employee review of operations.

^q We have assumed that each of the 5 respondents will take 1.5 hours 94 times per year to enter information.

^r We have assumed that each of the 5 respondents for subpart Eb will take four hours two times per year to enter employee review of operation information.

Table 2: Average Annual EPA Burden and Cost – NSPS for Municipal Waste Combustors (40 CFR Part 60, Subparts Ea and Eb) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (AxB)	(D) Plants per year ^b	(E) Technical person- hours per year (CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^a
Initial performance tests for Ea	180	1	180	0	0	0	0	\$0
Review report of initial performance test for Ea	24	1	24	0	0	0	0	\$0
Repeat performance test for Ea	12	1	12	0	0	0	0	\$0
Repeat performance test for Eb ^c	12	1	12	0.07	0.84	0.04	0.08	\$43.97
Report review for Ea								
Notification of construction	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of initial test	2	1	2	0	0	0	0	\$0
Notification of CMS demonstration	12	1	12	0	0	0	0	\$0
Review of CEMS demonstration for Ea	96	1	96	0	0	0	0	\$0
Review excess emission reports for Ea								
No excess emission report ^e	8	1	8	6.4	51.2	2.56	5.12	\$2,679.81
Excess emission report ^f	2	1	2	1.6	3.2	0.16	0.32	\$167.49
Review quarterly appendix F reports for Ea ^h	0.5	4	2	8	16	0.8	1.6	\$837.44
Review quarterly compliance report for Ea ^h	8	4	32	8	256	12.8	25.6	\$13,399.04
Review annual compliance tests for Ea ^j	18	1	18	8	144	7.2	14.4	\$7,536.96
Report review for Eb ^d								
Notification of construction	2	1	2	0.33	0.66	0.03	0.07	\$34.54
Notification of initial performance test	8	1	8	0.33	2.64	0.13	0.26	\$138.18
Notification of CEMS demonstration	5	1	5	0.33	1.65	0.08	0.17	\$86.36

Review CEMS demonstration for Eb	40	1	40	0.33	13.2	0.66	1.32	\$690.89
Review semiannual excess emission reports for Eb ^g	12	2	24	5	120	6	12	\$6,280.80
Review of quarterly Appendix F reports for Eb	5	4	20	5	100	5	10	\$5,234.00
Review annual compliance reports for Eb ⁱ	5	1	5	5	25	1.25	2.5	\$1,308.50
Review siting requirements study for Eb ^k	24	1	24	0.33	7.92	0.40	0.79	\$414.53
TOTAL ANNUAL BURDEN AND COST						854		\$38,852.51

Assumptions:

^a We have estimated that an average of 13 sources are subject to subparts Ea and Eb. Eight of these sources are currently subject to subpart Ea, with no additional sources becoming subject to the regulation in the next three years. The remaining five sources are subject to subpart Eb (with one source startup in 2015).

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.90 Managerial rate (GS-13, Step 5, \$39.31 x 1.6), \$46.67 Technical rate (GS-12, Step 1, \$29.17 x 1.6), and \$25.25 Clerical rate (GS-6, Step 3, \$15.78 x 1.6). These rates are from the Office of Personnel Management (OPM) 2014 General Schedule which excludes locality rates of pay

^c It is estimated that respondents will take 12 hours once per year to perform retest preparations and observance for subpart Eb.

^d We have assumed that only one respondent will be required to perform report review for Eb.

^e It is estimated that 80 percent of respondents will review reports for no excess emission for subpart Ea.

^f It is assumed that 20 percent of respondents will review reports for excess emission for subpart Ea.

^g We have assumed that all 5 respondents that are subject to subpart EB will review semiannual excess emission reports.

^h We have assumed that all 8 respondents that are currently subject to subpart Ea will have to review quarterly reports.

ⁱ We have assumed that all 5 respondents that are subject to subpart Eb will have to review annual compliance reports.

^j We have assumed that it will take 18 hours to review the annual compliance test for Ea.

^k All of the 5 respondents that are subject to subpart Eb will have to review the siting requirement's study.