**SUPPORTING STATEMENT**

 **ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Fossil Fuel Fired Steam Generating Units (40 CFR Part 60, Subpart D) (Renewal)**

**1. Identification of the Information Collection**

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

NSPS for Fossil Fuel Fired Steam Generating Units (40 CFR Part 60, Subpart D) (Renewal), EPA ICR Number 1052.11, OMB Control Number 2060-0026.

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

The New Source Performance Standards (NSPS) for Fossil Fuel Fired Steam Generating Units were proposed on August 17, 1971, promulgated on December 23, 1971, and amended on both January 20, 2011 and February 16, 2012. These regulations apply to each fossil fuel fired steam generating unit with heat input rate of 73 megawatts (MW) (250 MMbtu/hr) or more, which commenced construction, reconstruction, or modification after August 17, 1971. Subpart D regulations apply to both electric utility and industrial boilers. This regulation was supplanted by NSPS Subpart Da for electric utility steam generating units in 1978, and by NSPS Subpart Db for industrial-institutional-commercial boilers in 1986. This information is being collected to assure compliance with 40 CFR Part 60, Subpart D.

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

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

The “Affected Public” constitutes private sector businesses that operate fossil fuel fired steam generating units. None of the facilities in the United States are owned by either state, local, tribal entities, or by the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Fossil Fuel Fired Steam Generating Units (40 CFR Part 60, Subpart D) (Renewal). The Federal Government’s “burden” is attributed entirely to work performed by either Federal employees or government contractors. The burden to the Federal Government may be found below in Table 2: Average Annual EPA Burden and Cost – NSPS for Fossil Fuel Fired Steam Generating Units (40 CFR Part 60, Subpart D) (Renewal).

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

Over the next three years, approximately 660 respondents per year will be subject to the standard, and no additional respondents per year will become subject to these standards. Electric utility boilers, constructed after September 1978, are subject to Subpart Da, while industrial, commercial, and institutional boilers, constructed after June 19, 1986, are subject to Subpart Db. Basically, there have been no new Subpart D units since 1986 and none are expected in the future.

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

**2. Need for and Use of the Collection**

**2(a) Need/Authority for the Collection**

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

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

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

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

In the Administrator's judgment, sulfur dioxide (SO2), particulate matter (PM), and nitrogen oxides (NOx) emissions from fossil fuel fired steam generating units either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60,Subpart D.

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

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

Performance tests are required in order to determine an affected facility’s initial capability to comply with the emission standard. The performance stack test usually requires three 1-hour test runs using the EPA reference test method to demonstrate compliance. Subpart D requires only one performance test (the initial compliance stack test). Continuous emission monitors are used to ensure compliance with the standards at all times.

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 and the standards are being met. The performance test may also be observed.

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

**3. Non-duplication, Consultations, and Other Collection Criteria**

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

**3(a) Non-duplication**

 If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

**3(b) Public Notice Required Prior to ICR Submission to OMB**

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (80 FR 32116) on June 5, 2015. 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 Integrated Compliance Information System (ICIS). ICIS is EPA’s database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency’s internal industry experts. Approximately 660 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and the standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Council of Industrial Boiler Owners, at (540) 349-9043; and the American Boiler Manufacturers Association, at (703) 356-7172.

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.

**3(f) Confidentiality**

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

**3(g) Sensitive Questions**

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

**4. The Respondents and the Information Requested**

**4(a) Respondents/SIC Codes**

The respondents to the recordkeeping and reporting requirements are fossil fuel fired steam generating units. The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes for fossil fuel fired steam generating units are provided in the following table.

| **Standard (40 CFR Part 60, Subpart D)** | **SIC Codes** | **NAICS Codes** |
| --- | --- | --- |
| Oil and Gas Extraction | 13 | 211 |
| Utilities | 49 | 221 |
| Fossil Fuel Electric Power Generation | 49 | 221112 |
| Electric Power Transmission, Control, and Distribution | 491 | 22112 |
| Leather and Allied Product Manufacturing | 31 | 316 |
| Wood Product Manufacturing | 24 | 321 |
| Paper Manufacturing | 26 | 322 |
| Petroleum and Coal Products Manufacturing | 29 | 324 |
| Chemical Manufacturing | 28 | 325 |
| Plastics and Rubber Products Manufacturing | 30 | 326 |
| Primary Metal Manufacturing | 33 | 331 |
| Fabricated Metal Product Manufacturing | 34 | 332 |
| Transportation Equipment Manufacturing | 37 | 336 |
| Miscellaneous Manufacturing | 39 | 339 |
| Educational services | 82 | 611 |
| Hospitals | 806 | 622 |
| American Indian and Alaska Native Tribal Governments | 8641 | 921150 |

**4(b) Information Requested**

**(i) Data Items**

In this ICR, all the data that is recorded or reported is required by the NSPS for Fossil Fuel Fired Steam Generating Units (40 CFR Part 60, Subpart D).

A source must make the following reports:

| **Notifications/Reports** |
| --- |
| Construction/reconstruction date  | 60.7(a)(1)  |
| Actual startup date  | 60.7(a)(3)  |
| Initial performance test results  | 60.8 (a) |
| Initial performance test  | 60.8(d) |
| Demonstration of continuous monitoring system  | 60.7(a)(5) |
| Opacity test notification | 60.7(a)(6) |
| Physical or operational change  | 60.7(a)(4) |
| Excess emissions and monitoring system performance semiannual report | 60.7(c), 60.45(g) |

A source must keep the following records:

| **Recordkeeping** |
| --- |
| Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative | 60.7(b) |
| Maintain records for two years | 60.7(f) |

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.

**(ii) Respondent Activities**

| **Respondent Activities** |
| --- |
| Familiarization with the regulatory requirements. |
| Install, certify, maintain, and operate continuous monitoring systems (CMS) for opacity, SO2, NOx (or, alternatively, a CO continuous emissions monitoring systems (CEMS) rather than continuous opacity monitoring system (COMS)), and either O2 or CO2 or a fuel sampling and analysis system. |
| Perform initial performance test to demonstrate compliance. |
| 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. |
| 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. |

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

**5(a) Agency Activities**

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

| **Agency Activities** |
| --- |
| Observe initial performance tests. |
| 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 Enforcement and Compliance History Online (ECHO) and ICIS. |

**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. 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 reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA’s database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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 two years.

**5(c) Small Entity Flexibility**

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

**5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NSPS for Fossil Fuel Fired Steam Generating Units (40 CFR Part 60, Subpart D) (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 record-keeping and reporting requirements is estimated to be 71,500 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

**6(b) Estimating Respondent Costs**

**(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial $129.93 ($61.87+ 110%)

Technical $103.97 ($49.51 + 110%)

Clerical $51.79 ($24.66 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 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 standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

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

| **Capital/Startup vs. Operation and Maintenance (O&M) Costs** |
| --- |
| (A)Continuous Monitoring Device | (B)Capital/Startup Cost for One Respondent | (C)Number of New Respondents  | (D)Total Capital/Startup Cost, (B X C) | (E)Annual O&M Costs for One Respondent | (F)Number of Respondents with O&M | (G)Total O&M,(E X F) |
| SO2, PM, and NOx | $200,000 | 0 | $0 | $15,000 | 660 | $9,900,000 |

 Note: Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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

The total operation and maintenance (O&M) costs for this ICR are $9,900,000. This is the total of column G.

The average annual cost for capital/startup and/or operation and maintenance costs to this industry over the next three years of the ICR is estimated to be $9,900,000. 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 such activities 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 $90,000.

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 Fossil Fuel Fired Steam Generating Units (40 CFR Part 60, Subpart D) (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 660 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject. This is because electric utility boilers constructed after September 1978 are subject to Subpart Da, while industrial, commercial, and institutional boilers constructed after June 19, 1986 are subject to Subpart Db. Basically, there have been no new Subpart D units since 1986 and none are expected in the future. The overall average number of respondents, as shown in the table below, is 660 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 | 0 | 660 | 0 | 0 | 660 |
| 2 | 0 | 660 | 0 | 0 | 660 |
| 3 | 0 | 660 | 0 | 0 | 660 |
| Average | 0 | 660 | 0 | 0 | 660 |

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 660.

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 ResponsesE=(BxC)+D |
| Semiannual Report | 660 | 2 | N/A | 1,320 |
|  |  |  | Total | 1,320 |

The number of Total Annual Responses is 1,320.

The total annual labor costs are $7,190,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Fossil Fuel Fired Steam Generating Units (40 CFR Part 60, Subpart D) (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 71,500 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Fossil Fuel Fired Steam Generating Units (40 CFR Part 60, Subpart D) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 54 hours per response.

The total annual capital/startup and/or O&M costs to the regulated entity are $9,900,000. 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 1,980 labor hours at a cost of $90,000. See (below) Table 2: Average Annual EPA Burden and Cost – NSPS for Fossil Fuel Fired Steam Generating Units (40 CFR Part 60, Subpart D) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

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

There is a small increase in the respondent labor hours in this ICR compared to the previous ICR. This is due to assuming all existing sources will have to re-familiarize with the regulatory requirements each year. This also results in an increase in labor costs for the respondents.

In, addition there is a small increase in the Agency labor costs due to an increase in labor rates. This ICR uses updated labor rates from the Bureau of Labor Statistics to calculate burden costs. There is also an increase is Agency labor hours this is not due to program changes; rather, the changes occurred because we are rounding total values in this ICR to three significant figures.

**6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 54 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-2012-0497. An electronic version of the public docket is available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2012-0497 and OMB Control Number 2060-0026 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 Fossil Fuel Fired Steam Generating Units (40 CFR Part 60, Subpart D) (Renewal)**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Burden Item** | **(A) Person hours per occurrence** | **(B) Number 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 (F=Ex0.05)** | **(G) Clerical person hours per year (G=Ex0.1)** | **(H)Cost, ($) b** |
| 1. Applications | N/A |   |   |   |   |   |   |   |
| 2. Survey and Studies | N/A |   |   |   |   |   |   |   |
| 3. Reporting Requirements |   |   |   |   |   |   |   |   |
|  A. Familiarization with Regulatory Requirements c | 1 | 1 | 1 | 660 | 660 | 33 | 66 | $76,326.03 |
|  B. Required activities |   |   |   |   |   |   |   |   |
|  Initial performance test d | N/A |   |   |   |   |   |   |   |
|  C. Create information d | N/A |   |   |   |   |   |   |   |
|  D. Gather Existing Information | See 3E |   |   |   |   |   |   |   |
|  E. Write report |   |   |   |   |   |   |   |   |
|  Notification of construction/reconstruction d | N/A |   |   |   |   |   |   |   |
|  Notification of anticipated/actual startup d | N/A |   |   |   |   |   |   |   |
|  Notify of emission test d | N/A |   |   |   |   |   |   |   |
|  Report of initial emission test d | N/A |   |   |   |   |   |   |   |
|  Excess emissions report e | 1 | 2 | 2 | 660 | 1,320 | 66 | 132 | $152,652.06 |
| **Subtotal Reporting Requirements** |   |   |   |   | **2,277** | **$228,978** |
| 4. Recordkeeping Requirements |   |   |   |   |   |   |   |   |
|  A. Familiarization with Regulatory Requirements c | See 3A |   |   |   |   |   |   |   |
|  B. Plan activities | See 4C |   |   |   |   |   |   |   |
|  C. Implement activities | See 3B |   |   |   |   |   |   |   |
|  D. Develop record system | N/A |   |   |   |   |   |   |   |
|  E. Time to check computer system and calibrate continuous monitors f | 0.25 | 365 | 91.25 | 660 | 60,225 | 3,011.25 | 6,022.5 | $6,964,750.24 |
|  F. Time to Train Personnel | N/A |   |   |   |   |   |   |   |
|  G. Time For Audits | N/A |   |   |   |   |   |   |   |
| **Subtotal Recordkeeping Requirements** |   |   |   |   | **69,259** | **$6,964,750** |
| **TOTAL LABOR BURDEN AND COST(rounded) g** |   |   |   |   | **71,500** | **$7,190,000** |
| **Capital and O&M COST** |   |   |   |   |   |   |   | **$9,900,000**  |
| **Grand Total** |   |   |   |   |  |  |  | **$17,100,000**  |

**Assumptions:**

a We have assumed that the average number of respondents that will be subject to the rule will be 660. There will be no additional new sources that will become subject to the rule over the three-year period of this ICR.

b This ICR uses the following labor rates: Managerial $129.93 ($61.87+ 110%); Technical $103.97 ($49.51 + 110%); and Clerical $51.79 ($24.66 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 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. This ICR assumes that Managerial hours are 5% of Technical hours, and Clerical hours are 10% of Technical hours.

c We assume that all respondents will have to familiarize with regulatory requirements and it will take 1 hour per respondent to familiarize with regulatory requirements.

d There have been no new Subpart D units since 1986, and new units are not expected over the three-year period of this ICR; therefore, this burden item is not applicable.

e We assume that each source will submit a semiannual report due to excess emission and monitoring systems performance over the three-year period.

f We assume that respondents conduct this activity on a daily basis, and that plant operations occur 365 days per year.

g Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding

**Table 2: Average Annual EPA Burden and Cost – NSPS for Fossil Fuel Fired Steam Generating Units (40 CFR Part 60, Subpart D) (Renewal)**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Burden Item** | **(A) EPA Hours per Occurrence** | **(B)Number of occurrences per plant per year** | **(C) EPA Person hour per year(C=AxB)** | **(D)Plants per year a** | **(E) Technical hours per year(E=CxD)** | **(F)Management hours per year(F=Ex0.05)** | **(G)Clerical hours per year(G=Ex0.10)**  | **(H)Cost, ($) b** |
| **Report Review**  |   |   |   |   |   |   |   |   |
|  Notification of construction | N/A |   |   |   |   |   |   |   |
|  Notification of anticipated startup | N/A |   |   |   |   |   |   |   |
|  Notification of actual startup | N/A |   |   |   |   |   |   |   |
| Notification of Initial Test |   |   |   |   |   |   |   |   |
|  Sulfur dioxide c | N/A |   |   |   |   |   |   |   |
|  Particulate matter c | N/A |   |   |   |   |   |   |   |
|  Nitrogen oxides c | N/A |   |   |   |   |   |   |   |
| Review Initial Test Results |   |   |   |   |   |   |   |   |
|  Sulfur dioxide c | N/A |   |   |   |   |   |   |   |
|  Particulate matter c | N/A |   |   |   |   |   |   |   |
|  Nitrogen oxides c | N/A |   |   |   |   |   |   |   |
| Review Notification of CMS Demonstration |   |   |   |   |   |   |   |   |
|  Sulfur dioxide c | N/A |   |   |   |   |   |   |   |
|  Particulate matter c | N/A |   |   |   |   |   |   |   |
|  Nitrogen oxides c | N/A |   |   |   |   |   |   |   |
| Review CMS Performance Demonstration |   |   |   |   |   |   |   |   |
|  Sulfur dioxide c | N/A |   |   |   |   |   |   |   |
|  Particulate matter c | N/A |   |   |   |   |   |   |   |
|  Nitrogen oxides | N/A |   |   |   |   |   |   |   |
| Review excess emission reports **d** | 1 | 2 | 2 | 460 | 920 | 46 | 92 | $48,152.80  |
| Review sulfur dioxide compliance reports d, e |   |   |   |   |   |   |   |   |
|  Coal-Fired units | 2 | 2 | 4 | 133 | 532 | 26.6 | 53.2 | $27,844.88  |
|  Oil-Fired units | 2 | 2 | 4 | 67 | 268 | 13.4 | 26.8 | $14,027.12  |
| Travel expenses | N/A |   |   |   |   |   |   |   |
| **TOTAL ANNUAL BURDEN AND COST (rounded) f** |   |   |   |   | **1,980** | **$90,000**  |

**Assumptions:**

a We have assumed that the average number of respondents that will be subject to the rule will be 660. There will be no additional new sources that will become subject to the rule over the three-year period of this ICR.

b This ICR uses the following labor rates: Managerial $62.90 (GS-13, Step 5, $39.31 + 60%); Technical $46.67 (GS-12, Step 1, $29.17 + 60%); and 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. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

c There have been no new Subpart D units since 1986, and new units are not expected over the three-year period of this ICR; therefore, this burden item is not applicable.

d We assume that approximately 70 percent of the sources monitor via CEM and that approximately 30 percent use fuel sampling and analysis.

e Units using fuel sampling and analysis submit sulfur dioxide compliance reports instead of excess emission reports, which are based on CEM data. The figures used in this category are based on research performed during regulation revision.

f Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding