

Two existing, industrial (Group 1) facilities will now be required to have a pretreatment program and meet a HAP fraction limit (0.08). These facilities are currently in compliance with the pretreatment program and the HAP fraction limit (0.08). No burden associated with the pretreatment requirements are anticipated under the RTR rule amendments as the

Four existing, non-industrial (Group 2) facilities will now be required to have a pretreatment program and meet a HAP fraction limit (0.08). Each of these facilities is currently in compliance with the new requirements based on their responses to the ICIP. No burden associated with the pretreatment requirements are anticipated under the RTR rule amendments as the

AP fraction emitted limit of 0.08.

Therefore, there are no Capital & O&M costs associated with the rule amendments.  
These sources currently report under the CWA.

: a HAP fraction emitted limit of 0.08.

R. Therefore, there are no Capital & O&M costs associated with the rule amendments.  
These sources currently report under the CWA.

<b>Number of Respondents</b>					
	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	6	0	0	0	6
2	0	6	0	0	6
3	0	6	0	0	6
Average	2	4	0	0	6

<sup>1</sup> New respondents include 6 existing sources with new reporting requirements under the amended rule.

|

<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=(BxC)+D
Initial notification	0	1	0	0
Notification of compliance status	6	1	0	6
Request for extension of compliance	0	1	0	0
Notification of special compliance requirements	0	1	0	0
Notification of initial performance test	0	1	0	0
Additional notification requirements for sources with CMS	0	1	0	0
Notification of adjustments to time periods	0	1	0	0
Notification of changes to information provided	0	1	0	0
Initial performance test report	0	1	0	0
Inspection and monitoring plan	0	1	0	0
Annual report	0	1	0	0
Excess emissions report	0	1	0	0
Initial report on compliance approach	6	1	0	6
			Total	12

CMS - Continuous Monitoring System

hrs/response:

8.25

**Table 1: Annual Respondent Burden and Cost – NESHAP for Publicly Owned Treatment**

Burden item	A	B	C
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)
1. Applications	N/A		
2. Surveys and studies	N/A		
3. Reporting requirements			
A. Familiarization with rule requirements <sup>c</sup>	0.5	1	1
B. Required activities			
Initial notification	2	1	2
Notification of compliance status <sup>d</sup>	2	1	2
C. Create information	See 3B		
D. Gather existing information	See 3B		
E. Write reports			
Request for extension of compliance	2	1	2
Notification of special compliance requirements	2	1	2
Notification of initial performance test <sup>d</sup>	N/A		
Additional notification requirements for source with CMS	2	1	2
Notification of adjustments to time periods	2	1	2
Notification of changes to information provided	2	1	2
Initial performance test report	N/A		
Inspection and monitoring plan	N/A		
Annual report	1	2	2
Excess emissions report	2	1	2
HAP fraction emitted report	4	1	4
Initial report on compliance approach	4	1	4
<b>Reporting Subtotal</b>			
4. Recordkeeping			
A. Familiarization with rule requirements	See 3A		
B. Plan activities	See 3E		
C. Implement activities	See 3E		
D. Develop record system	See 3E		
E. Time to enter information			
Records of annual inspections	2	1	2
Records of inspections, defects, and repair delays	2	1	2
Methods and data used to determine compliance with fraction emitted limits <sup>d</sup>	2	1	4
F. Time to transmit or disclose information	N/A		
G. Time to train personnel	N/A		
H. Time for audits	N/A		
<b>Recordkeeping Subtotal</b>			
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED) <sup>e</sup></b>			
<b>TOTAL ANNUAL CAPITAL AND O&amp;M COST (SEE SECTION 6(b)(iii))</b>			
<b>GRAND TOTAL (LABOR, CAPITAL, AND O&amp;M) <sup>e</sup></b>			

CMS - Continuous Monitoring System

N/A - Not Applicable

**Assumptions:**

- a EPA estimates six existing sources will now be subject to reporting requirements. We do not expect any new sources.
- b This ICR uses the following labor rates: \$108.61 (technical), \$143.26 (managerial), and \$52.88 (clerical). These rates are from column 1, “September 2016, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “benefit packages available to those employed by private industry. <http://www.bls.gov/news.release/ecec.t02.htm>
- c This burden represents the time existing respondents spend familiarizing themselves with the rule amendments.
- d The proposed rule revisions now require additional recordkeeping and reporting from 4 existing, non-industrial F
- e Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.

**Works (40 CFR Part 63, Subpart VVV) (2016 RTR)**

Labor Rates:      \$108.61          \$143.26          \$52.88

<b>D</b>	<b>E</b>	<b>F</b>	<b>G</b>	<b>H</b>
<b>Respondents per year <sup>a</sup></b>	<b>Technical hours per year (Cx D)</b>	<b>Management hours per year (Ex 0.05)</b>	<b>Clerical hours per year (Ex 0.10)</b>	<b>Annual cost (\$) <sup>b</sup></b>
6	3	0.2	0.3	363
0	0	0	0	0
6	12	1	1	1,453
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0.0	0.0	0
0	0	0	0	0
6	24	1	2	2,905
6	24	1	2	2,905
		<b>72</b>		<b>7,627</b>
0	0	0	0	0
0	0	0	0	0
6	24	1	2	2,905
		<b>27</b>		<b>2,905</b>
		<b>99</b>		<b>10,530</b>
				<b>0</b>
				<b>10,530</b>



ances will become subject to the rule over the next three years.

rates are from the United States Department of Labor, Bureau of Labor Statistics, Total compensation.” They have been increased by 110 percent to account for the

POTWs and from 2 existing, industrial POTWs.

Source Type	No.
Existing	0
New (other sectors)	6

(4 existing/non-industrial sources now subject to rqmts, 2 exis

**ERG Notes:**

63.1590(a)(1) - will now require compliance status notifications for 4 existing non-industrial (Group 2) POTWs and 2

63.1590(a)(2) - will now require all 6 existing sources to report their HAP fraction emitted annually.

63.1590(f) - will now require all 6 existing sources to develop a compliance demonstration plan to meet the fraction er

63.1589(b) - will now require all 6 existing sources to prepare and maintain records to meet the fraction emitted limit.

isting industrial sources subject to new rqmts)

existing industrial (Group 1) POTWs.

nitted limit.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Publicly Owned Treatment Works**

Labor Rates:

Burden item	A	B	C	D
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>
Initial performance test <sup>c</sup>	N/A			
Repeat initial performance test <sup>c</sup>	N/A			
Report review				
Initial notification	2	1	2	0
Notification of compliance status <sup>c</sup>	2	1	2	6
Request for extension of compliance	0.5	1	1	0
Notification of special compliance requirements	2	1	2	0
Notification of initial performance test <sup>c</sup>	2	1	2	0
Additional notification requirements for sources with CMS	2	1	2	0
Notification of adjustments to time periods	2	1	2	0
Notification of changes to information provided	2	1	2	0
Initial performance test report <sup>c</sup>	N/A			
Inspection and monitoring plan <sup>c</sup>	N/A			
Annual report	1	2	2	0
Excess emissions report	N/A			
HAP fraction emitted report	2	1	2	6
Initial report on compliance approach	2	1	2	6
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED) <sup>d</sup></b>				

CMS - Continuous Monitoring System

N/A - Not Applicable

**Assumptions:**

a EPA estimates an average of six existing sources will be subject to the standard. We do not expect any new sources will be subject to the standard.

b This ICR uses the following labor rates: \$47.60 (technical), \$64.16 (managerial), and \$25.76 (clerical). These rates are Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit package.

c Existing sources are now subject to rule emission limits and related performance testing (if applicable), plan development, and reporting requirements.

d Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.

**orks (40 CFR Part 63, Subpart VVV) (2016 RTR)**

\$ 47.62 \$ 64.16 \$ 25.76

<b>E</b>	<b>F</b>	<b>G</b>	<b>H</b>
<b>Technical hours per year (CxD)</b>	<b>Management hours per year (Ex0.05)</b>	<b>Clerical hours per year (Ex0.10)</b>	<b>Annual cost (\$)<sup>b</sup></b>
0	0	0	0
12	1	1	641
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
0	0.0	0.0	0.00
12	1	1	641
12	1	1	641
<b>41</b>			<b>1,922</b>

63.1590(a)(1) - will now require compliance :

63.1590(a)(2) - will now require all 6 existing  
 63.1590(f) - will now require all 6 existing sc

ll become subject to the rule over the next three years.  
 from the Office of Personnel Management (OPM), 2016 General  
 ckages available to government employees.  
 ent, and reporting activities.

status notifications for 4 existing non-industrial (Group 2) POTWs and 2 existing industrial (Group 1) POTWs.

3 sources to report their HAP fraction emitted annually.

sources to develop a compliance demonstration plan to meet the fraction emitted limit.

No Capital/Startup or O&M costs for this ICR.