Person-notes   Person-notes   Person-notes   Per year		Α	В	С	D
1. Applications	Burden Item	person-hours	occurrences per respondent	person-hours per respondent per year	Respondents per year <sup>a</sup>
2. Survey and Studies					
3. Reporting Requirements A. Familiarize with regulation requirements 4 b 40 1 40 4 B. Required activities 1) Initial stack test and report 6 40 1 40 1 2) Annual stack test and test report 6 40 0.33 13.2 4 3) Operator training and qualification 2 30 Obtain operator qualification course 6 4 1 64 1 b) Obtain operator qualification 6 72 1 72 1 1 c) Annual refresher course 12 1 12 1 12 1 d) Initial review of site-specific information See 3A 1 8 4 4) Establish operating parameters (maximum and minimum) 6 5) Continuous parameter monitoring (including CEMS) D. Gather Existing Information See 3B D. Gather Existing Information See 3B E. Write report 1) Notification of construction (includes siting analysis) 6 160 1 160	1. Applications	N/A			
A. Familiarize with regulation requirements db 40 1 40 4  B. Required activities 1) Initial stack test and report 6 40 1 40 1 2) Annual stack test and test report 6 40 0.33 13.2 4 3) Operator training and qualification a B. Establish and teach operator qualification course 6 4 1 6 4 1 b) Obtain operator qualification 6 4 72 1 72 1 c) Annual refresher course 12 1 12 1 d) Initial review of site-specific information See 3A 8 e) Annual review of site-specific information 8 1 8 4 4) Establish operating parameters (maximum and minimum) 6 5) Continuous parameters (maximum and minimum) 6 C. Create Information See 3B	2. Survey and Studies	N/A			
B. Required activities  1) Initial stack test and report c  1) Annual stack test and report c  2) Annual stack test and test report c  3) Operator training and qualification a) Establish and teach operator qualification course c  3) Establish and teach operator qualification course c  40  41  64  1  1  1  1  1  1  1  1  1  1  1  1  1	3. Reporting Requirements				
1) Initial stack test and report \$\circ\$ 40 1 40 0.33 13.2 4  2) Annual stack test and test report \$\circ\$ 40 0.33 13.2 4  3) Operator training and qualification a) Establish and teach operator qualification course a) Establish and teach operator qualification course a) Establish and teach operator qualification \$\circ\$ 64 1 64 1  b) Obtain operator qualification \$\circ\$ 4 72 1 72 1  c) Annual refresher course 12 1 12 1 12 1  d) Initial review of site-specific information See 3A	A. Familiarize with regulation requirements d,h	40	1	40	4
2) Annual stack test and test report 6-b  3) Operator training and qualification  a) Establish and teach operator qualification course color dualification color	B. Required activities				
3) Operator training and qualification a) Establish and teach operator qualification course c,d d) Establish and teach operator qualification course c,d d) Establish and teach operator qualification course c,d d) Dibitation operator qualification course c) Annual refresher course d) Initial review of site-specific information E) Annual Compliance Report E) B) Corrective action summary for operators that are off-site for more than 2 weeks in the summary for operators that are off-site for more than 2 weeks in the summary for operators that are off-site for more than 2 weeks in the summary for operators that are off-site for more than 2 weeks in the summary for operators that are off-site for more than 2 weeks in the summary for operators that are off-site for more than 2 weeks in the summary for operators that are off-site for more than 2 weeks in the summary for operators that are off-site for more than 2 weeks in the summary for operators that are off-site for more than 2 weeks in the summary for operators that are off-site for more than 2 weeks in the summary for operators that are off-site for more than 2 weeks in the summary for operators that are off-site	1) Initial stack test and report <sup>c</sup>	40	1	40	1
a) Establish and teach operator qualification course  of death of the properator qualification course  of death of the properator qualification course  of death of the properator qualification course  of Annual refresher course  of Death of Site-specific information  of See 3A  e) Annual review of site-specific information  of See 3A  e) Annual review of site-specific information  of See 3A  e) Annual review of site-specific information  of See 3A  e) Annual review of site-specific information  of See 3A  e) Annual review of site-specific information  of See 3A  for death of the proper of the properator of the proper	2) Annual stack test and test report e, h	40	0.33	13.2	4
a) Establish and teach operator qualification course  of death of the properator qualification course  of death of the properator qualification course  of death of the properator qualification course  of Annual refresher course  of Death of Site-specific information  of See 3A  e) Annual review of site-specific information  of See 3A  e) Annual review of site-specific information  of See 3A  e) Annual review of site-specific information  of See 3A  e) Annual review of site-specific information  of See 3A  e) Annual review of site-specific information  of See 3A  for death of the proper of the properator of the proper	3) Operator training and qualification				
c) Annual refresher course d) Initial review of site-specific information e) Annual Compliance Report for operators that are off-site for more than 2 weeks f e) Annual Compliance and the review of site-specific information for Annual Compliance and the review of site-specific information for Annual Compliance and the review of site-specific information for Annual Compliance Report for operators that are off-site for more than 2 weeks f for Annual Compliance Report for operators that are off-site for more than 2 weeks f for Annual Compliance Report for operators under the review of site-specific information for the set of the review of site-specific information for set and the set of the review of site specific information for set and the set of the se	a) Establish and teach operator qualification course	64	1	64	1
d) Initial review of site-specific information e) Annual review of site-specific information e e) Annual Compliance Report e) Annual Compliance Report e) Annual Competition of initial performators that are off-site for more than 2 weeks e e) Annual review of site-specific information e e e e e e e e e e e e e e e e e e e	b) Obtain operator qualification <sup>c, d</sup>	72	1	72	1
e) Annual review of site-specific information • 8 1 8 4  4) Establish operating parameters (maximum and minimum) • 40 1 1 40 1  5) Continuous parameter monitoring (including CEMS) 11 1 1 1 1 1 4  C. Create Information See 3B  D. Gather Existing Information See 3E  E. Write report 1 160 1 160 1  2) Notification of construction (includes siting analysis) • 2 1 40 1  3) Notification of start-up (includes monitoring plan) 1 2 1 2 1  4) Notification of initial performance test • 2 1 2 1  4) Notification of initial CMS Demonstration b 2 1 2 1  5) Initial Compliance Report 40 1 40 1  6) Annual Compliance Report 40 1 40 4  7) Status report for operators that are off-site for more than 2 weeks • 8 2 16 1  8) Corrective action summary for operators that are off-site for more than 2 weeks • 1	c) Annual refresher course	12	1	12	1
4) Establish operating parameters (maximum and minimum) c  5) Continuous parameter monitoring (including CEMS)  11 1 1 1 1 4  C. Create Information See 3B  D. Gather Existing Information See 3E  E. Write report  1) Notification of construction (includes siting analysis) c  2) Notification of start-up (includes monitoring plan)  3) Notification of initial performance test c  4) Notification of initial CMS Demonstration b  2 1 2 1  4) Notification of initial CMS Demonstration b  5) Initial Compliance Report  40 1 40 1  5) Initial Compliance Report  40 1 40 1  6) Annual Compliance Report  40 1 40 4  7) Status report for operators that are off-site for more than 2 weeks f  8) Corrective action summary for operators that are off-site for more than 2 weeks f  8 2 16 1	d) Initial review of site-specific information	See 3A			
minimum) c  5) Continuous parameter monitoring (including CEMS)  C. Create Information  See 3B  D. Gather Existing Information  E. Write report  1) Notification of construction (includes siting analysis) c  2) Notification of start-up (includes monitoring plan)  3) Notification of initial performance test c  40  1 10  1 10  1 160  1 1 160  1 160  1 1 160	e) Annual review of site-specific information <sup>e</sup>	8	1	8	4
CEMS) C. Create Information See 3B D. Gather Existing Information E. Write report 1) Notification of construction (includes siting analysis) c 2) Notification of start-up (includes monitoring plan) 3) Notification of initial performance test c 4) Notification of initial CMS Demonstration c 5) Initial Compliance Report 40 1 40 1 40 1 5) Initial Compliance Report 40 40 40 40 40 40 40 40 40 40 40 40 40		40	1	40	1
D. Gather Existing Information  E. Write report  1) Notification of construction (includes siting analysis) c  2) Notification of start-up (includes monitoring plan)  3) Notification of initial performance test c  40  1  2  1  2  1  2  1  3) Notification of initial CMS Demonstration b  2  1  2  1  2  1  3) Initial Compliance Report  40  1  40  1  40  1  5) Initial Compliance Report  40  1  40  40  1  40  1  8) Corrective action summary for operators that are off-site for more than 2 weeks f  8  2  16  1		11	1	11	4
E. Write report  1) Notification of construction (includes siting analysis) c  2) Notification of start-up (includes monitoring plan)  3) Notification of initial performance test c  40  1  2 1  2 1  40  1  3) Notification of initial CMS Demonstration b  2 1 2 1  4) Notification of initial CMS Demonstration b  2 1 2 1  5) Initial Compliance Report  40  1 40  1  6) Annual Compliance Report  40  1 40  4  7) Status report for operators that are off-site for more than 2 weeks f  8 1  8) Corrective action summary for operators that are off-site for more than 2 weeks f	C. Create Information	See 3B			
1) Notification of construction (includes siting analysis) c  2) Notification of start-up (includes monitoring plan)  3) Notification of initial performance test c  2 1 2 1  4) Notification of initial CMS Demonstration b  2 1 2 1  5) Initial Compliance Report  40 1 40 1  6) Annual Compliance Report  40 1 40 1  6) Annual Compliance Report  40 1 40 4  7) Status report for operators that are off-site for more than 2 weeks f  8) Corrective action summary for operators that are off-site for more than 2 weeks f  8 2 16 1	D. Gather Existing Information	See 3E			
analysis) c  2) Notification of start-up (includes monitoring plan)  3) Notification of initial performance test c  4) Notification of initial CMS Demonstration b  2) Initial Compliance Report  40 1 2 1  2 1 2 1  3) Initial Compliance Report  40 1 40 1  6) Annual Compliance Report  40 1 40 4  7) Status report for operators that are off-site for more than 2 weeks f  8) Corrective action summary for operators that are off-site for more than 2 weeks f  8 2 16 1	E. Write report				
plan)  3) Notification of initial performance test c  2		160	1	160	1
4) Notification of initial CMS Demonstration b  2 1 2 1  5) Initial Compliance Report 40 1 40 1  6) Annual Compliance Report 40 1 40 4  7) Status report for operators that are off-site for more than 2 weeks f  8) Corrective action summary for operators that are off-site for more than 2 weeks f  8 2 16 1	į ,	40	1	40	1
5) Initial Compliance Report 40 1 40 1 6) Annual Compliance Report 40 1 40 4 7) Status report for operators that are off-site for more than 2 weeks f 8 1 8 1 8) Corrective action summary for operators that are off-site for more than 2 weeks f 8 2 16 1	3) Notification of initial performance test <sup>c</sup>	2	1	2	1
6) Annual Compliance Report  40  1  40  4  7) Status report for operators that are off-site for more than 2 weeks f  8) Corrective action summary for operators that are off-site for more than 2 weeks f  8  2  16  1	4) Notification of initial CMS Demonstration <sup>b</sup>	2	1	2	1
7) Status report for operators that are off-site for more than 2 weeks f  8	5) Initial Compliance Report	40	1	40	1
more than 2 weeks f  8) Corrective action summary for operators that are off-site for more than 2 weeks f  8 2 16 1	6) Annual Compliance Report	40	1	40	4
off-site for more than 2 weeks <sup>f</sup>		8	1	8	1
		8	2	16	1
9) Semiannual Deviation Report <sup>g</sup> 24 2 48 0.4	9) Semiannual Deviation Report <sup>g</sup>	24	2	48	0.4
Subtotal for Reporting Requirements	Subtotal for Reporting Requirements				
4. Recordkeeping Requirements	4. Recordkeeping Requirements				

A. Familiarize with regulation requirements	See 3A			
B. Plan activities	N/A			
C. Implement activities:	N/A			
D. Develop record system	N/A			
E. Record Information				
1) Records of operating parameters	2	52	104	0
2) Records of exceedances of the operating parameters	2	1	2	0.4
3) Records of stack tests	2	1	2	4
4) Records of siting analysis	2	1	2	1
5) Records of persons who have reviewed operating procedures	2	1	2	4
6) Records of persons who have completed operator training	2	1	2	4
7) Records of persons who meet operator qualification criteria	2	1	2	4
8) Records of monitoring device calibration	2	1	2	4
9) Records of site-specific documentation	24	1	24	4
F. Time to train personnel	See 3B			
G. Time for audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL ANNUAL BURDEN AND COST (Rounded) <sup>i</sup>				
Capital and O&M Costs (see Section 6(b)(iii))				
TOTAL (Rounded) <sup>i</sup>				

## **Assumptions:**

- a. Assumed that there are 4 existing facilities on average with 6 units. Burden estimates based on a "per respondent" basis, of 2 new sources and 1 modified source over the next three-year period, averaging to 1 new respondent per year. Estimate l
- b. This ICR uses the following labor rates: \$138.43 per hour for Executive, Administrative, and Managerial labor; \$106.45 Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2016, "group". The rates are from column 1, "Total Compensation". The rates have been increased by 110 percent to account for private industry.
- c. One-time only costs
- d. Costs incurred by a facility regardless of the number of affected units at the plant.
- e. Annual Costs. Annual costs are not incurred until the second year of operation.
- f. Assumed that 10 percent of the facilities (conservatively rounded to one) would not have a qualified operator available  $f\alpha$
- g. Assumed that 10 percent of the facilities would have an exceedance during the year.
- h. Facilities may test every three years if certain requirements are met, thus annual testing is divided by three to give a per
- i. Totals are rounded to 3 significant figures. Figures may not add exactly due to rounding.

E	F	G	Н
Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year <sup>b</sup>
160	8	16	\$18,983.66
40	2	4	\$4,745.92
52.8	2.64	5.28	\$6,265
64	3.2	6.4	\$7,593.47
72	3.6	7.2	\$8,542.65
12	0.6	1.2	\$1,423.77
32	1.6	3.2	\$3,796.73
40	2	4	\$4,745.92
44	2.2	4.4	\$5,220.51
160	8	16	\$18,983.66
40	2	4	\$4,745.92
2	0.1	0.2	\$237.30
2	0.1	0.2	\$237.30
40	2	4	\$4,745.92
160	8	16	\$18,984
8	0.4	0.8	\$949.18
16	0.8	1.6	\$1,898.37
19.2	0.96	1.92	\$2,278.04
	1109		\$114,377

Respondant Rates
(Source: http://www.bls.gov/news.release/ecec.t02.htm)

<u>Labor Type</u>	Total Compensation (\$/hr)	<u>Loaded Rate</u> (Rate + 110%rate)
Mgmt.	\$65.92	\$138.43
Tech.	\$50.69	\$106.45
Cler.	\$25.13	\$52.77

0	0	\$0
0.04	0.08	\$94.92
0.4	0.8	\$949.18
0.1	0.2	\$237.30
0.4	0.8	\$949.18
0.4	0.8	\$949.18
0.4	0.8	\$949.18
0.4	0.8	\$949.18
4.8	9.6	\$11,390.20
160		\$16,468
1270		\$131,000
		\$694,000
1270	•	\$825,000
	0.04 0.4 0.1 0.4 0.4 0.4 0.4 4.8 160 1270	0.04     0.08       0.4     0.8       0.1     0.2       0.4     0.8       0.4     0.8       0.4     0.8       4.8     9.6

99 hr/response

not a "per unit" basis. Assumed that there will be a total based on EPA's 2016 SSI Inventory.

5 per hour for Technical labor, and \$52.77 per hour for Table 2. Civilian Workers, by Occupational and Industry the benefit packages available to those employed by

or more than two weeks at least once a year. Assume that

year cost. It is assumed most facilities would meet the

	Α	В	C	D	E
Burden Item	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (CxD)
1. Applications	N/A				
2. Read and Understand Rule Requirements	40	1	40	4	160
3. Required Activities					
A. Observe stack tests <sup>c</sup>	48	1	48	1	48
B. Excess emissions - Enforcement activities	24	1	24	1	24
C. Create Information	N/A				
D. Gather Information	N/A				
E. Report Reviews					
1. Review initial notifications <sup>d</sup>	40	2	80	1	80
2. Review initial compliance report	40	1	40	1	40
3. Review annual compliance report	8	1	8	4	32
4. Review semi-annual excess emission and parameter exceedance report	16	2	32	0.4	12.8
5. Review status reports and corrective action summary for operators off-site	4	1	4	1	4
F. Prepare annual summary report <sup>e</sup>	4	1	4	4	16
TOTAL ANNUAL COST (rounded) f					

## **Assumptions:**

a. Assumed that there are 4 existing facilities on average with 6 units. Burden estimates based on a "per respondent" basis there will be a total of 2 new sources and 1 modified source over the next three-year period, averaging to 1 new responder 2016 SSI Inventory

b.This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for gov Managerial rate (GS-13, Step 5, \$40.10 x 1.6), \$47.62 Technical rate (GS-12, Step 1, \$29.76 x 1.6), and \$25.76 Clerical rates are from the Office of Personnel Management (OPM) "2016 General Schedule", which excludes locality rates of pay

- c. Assumes EPA personnel attend 20 percent of the stack tests (conservatively rounded up to one plant). Assume all facili
- d. Includes notification of construction and notification of start-up for new units.
- e. Using four hours per state to write annual summary report.
- f. Totals rounded to 3 significant figures. Figures may not add exactly due to rounding.

F	G	Н
Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year <sup>b</sup>
8	16	\$8,544.00
2.4	4.8	\$2,563.20
1.2	2.4	\$1,281.60
4	8	\$4,272
2	4	\$2,136
1.6	3.2	\$1,709
0.64	1.28	\$683.52
0.2	0.4	\$213.60
0.8	1.6	\$854.40
479		\$22,300

, not a "per unit" basis. Assumed that it per year. Estimates based on EPA's

ernment overhead expenses: \$64.16 ate (GS-6, Step 3,  $$16.10 \times 1.6$ ). These y.

ties meet reduced testing requirements.

**EPA** 

Source: http://www.opm.gov/oca/11tables/html/gs\_h.asp

	Hourly Mean Wage	With Fringe & Overhead
(GS- 12, step 1) - Tech.	29.76	\$47.62
(GS- 13, step 5) - Mgmt.	40.1	\$64.16
(GS-6, step 3) - Cler.	16.1	\$25.76

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 <sup>2</sup>	(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	1	3	0	0	4	
2	1	4	0	0	5	
3	1	5	0	0	6	
Average	1	4	0	0	5	

<sup>&</sup>lt;sup>1</sup> Assumed that there will be 2 new sources and 1 modified source over the next three years, averaging to

<sup>&</sup>lt;sup>1</sup>Assimiled there are 4 existilig facilities with 6 units on average. Based on EPA's 2016 SSI Inventory.

Total Annual Responses							
(A) Information Collection Activity	(B) Average Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports				
Notification of Construction	1	1	0	1			
Notification of Start-up	1	1	0	1			
Notification of Initial Performance Test	1	1	0	1			
Notification of Initial CMS Demonstration	1	1	0	1			
Initial Compliance Report	1	1	0	1			
Annual Compliance Report <sup>a</sup>	4	1	0	4			
Status report for operators that are off-site for more than 2 weeks <sup>b</sup>	1	1	0	1			
Corrective action summary for operators that are off-site for more than 2 weeks <sup>b</sup>	1	2	0	2			
Semiannual Deviation Report	0.4	2	0	0.8			
		_	Total .	13			

Facilities may test every three years if certain requirements are met, and it is assumed flost facilities would meet the requirements. However, annual compliance reports must be submitted regardless of whether a performance test is confident that fine the reconstruction in the reconstruction available for more than two weeks at least once a year. Assumed this would require only two corrective action summaries.

(A)	(B)	(C)	(D)	(E)	(F)	(G)
Item	Capital/Startup Cost for One Respondent	Number of New Respondents <sup>a</sup>	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F)
CPMS <sup>b</sup>	\$226,946	1	\$226,946	\$81,160	4	\$324,640
Stack testing c	\$61,350	1	\$61,350	\$61,350	1.32	\$80,982
Filing cabinet <sup>d</sup>	\$100	1	\$100			
Total			\$288,000			\$406,000

- a. Assumed that there are 4 existing facilities on average with 6 units. Burden estimates based on a "per respondent" basis Assumed that there will be a total of 2 new sources and 1 modified source over the next three-year period, averaging to 1 year. Estimates based on EPA's 2016 SSI Inventory
- b. Based on estimated monitoring costs provided in regulatory support documentation.
- c. Total estimated cost for initial stack test, including Method 5 (PM), Method 9 (opacity), Method 10 (CO), Method 26 (metals), Method 23 (CDD/CDF), Method 7E (NOx), and Method 6C (SO2). Facilities may test every three years if certa and it is assumed most facilities would meet the requirements.
- d. Assumed \$100 for purchase of filing cabinet to house copy of rule, records, and report copies.

## total \$694,000

s, not a "per unit" basis. new respondent per

(HCl), Method 29 in requirements are met,