

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) (Renewal),
EPA ICR Number 1773.12, OMB Control Number 2050-0171.

1(b) Short Characterization

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) were proposed on April 19, 1996, promulgated on September 30, 1999, and subsequently revised on October 12, 2005. These regulations apply to the following types of new and existing combustion units that burn hazardous waste: incinerators, cement kilns, lightweight aggregate kilns, solid fuel boilers, liquid fuel boilers, and hydrochloric acid production facilities. This information is being collected to assure compliance with 40 CFR Part 63, Subpart EEE.

In general, all NESHAP 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 NESHAP.

Any owner/operator subject to this NESHAP is required to maintain a file containing these documents and retain the file for at least five years following the generation date of such reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. EPA regional office.

The Affected Public includes owners/operators of hazardous waste combustors. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) (Renewal). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) (Renewal). There are currently approximately 177 hazardous waste combustor units at 153 facilities, which are owned and operated by the hazardous waste combustor industry. None of the 177 affected facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Over the next three years, approximately 180 HWC units per year will be subject to these standards, which includes one additional HWC unit per year that will become subject to these same standards during this period.

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 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants (HAP). These standards are applicable to new or existing sources of HAP and require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of the Clean Air 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, HAP emissions from hazardous waste combustors either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this category at 40 CFR Part 63, Subpart EEE.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations that 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 these 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 these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of these regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and leaks are being detected and repaired and that these 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. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart EEE.

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

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (83 FR 31142) on July 3, 2018. One comment was received on the *Federal Register* notice for this renewal, however, the comment was an anonymous submission unrelated to the burden or other aspects of the ICR, and does not require a response.

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 these standards, 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 and consultations with related trade organizations. Based on these consultations, approximately 180 existing units at 153 facilities will be subject to these standards over the three-year period covered by this ICR, which includes one new HWC unit per year.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as it was being developed and these

same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Coalition for Responsible Waste Incineration (CRWI), at 703-431-7343, and the American Chemistry Council, at 202-249-6131.

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. The comments received and our responses may be found in Section 3(b) above and the docket for this ICR at <http://www.fdms.gov>.

3(d) Effects of Less-Frequent Collection

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these 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 these standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (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 these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements are owners/operators of hazardous waste combustors. The United States North American Industry Classification System (NAICS) codes and Standard Industrial Classification (SIC) codes for the respondents affected by the standards is included in the following table.

40 CFR Part 63, Subpart EEE	SIC Codes	NAICS Codes
Petroleum and Coal Products Manufacturing	2911	324
Chemical Manufacturing	2869, 2899	325
Cement and concrete product manufacturing	3241	3273
Other nonmetallic mineral product manufacturing	3295	3279
Waste treatment and disposal	4953	5622
Remediation and other waste management services	4959	5629

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is are recorded or reported is required by the NESHAP for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE).

A source must make the following reports:

Notifications	
Application for construction or reconstruction.	§63.5(d)
Initial notifications that you are subject to Subpart EEE of this Part.	§63.9(b)
Notification that you are subject to special compliance requirements.	§63.9(d)
Notification and documentation of any change in information already provided under §63.9.	§63.9(j)
Notification of changes in design, operation, or maintenance.	§63.1206(b)(5)(i)
Notification of excessive bag leak detection system exceedances.	§63.1206(c)(8)(iv)

Notifications	
Notification of excessive particulate matter detection system exceedances.	§63.1206(c)(9)(viii)
Notification of performance test and continuous monitoring system evaluation, including the performance test plan and CMS performance evaluation plan.	§§63.1207(e), 63.1209(d), 63.8(e)(2) and (3), 63.7(b), 63.9(e) 63.9(g)(1) and (3)
Notification of use of COMS data for compliance with the opacity emission standard during a performance test and whether the criterion necessary to continue use of an alternative to relative accuracy testing has been exceeded.	§§63.9(g)(2) and (3)
Notification of intent to comply.	§63.1210(b) and (c)
Notification of compliance, including results of performance tests and continuous monitoring system performance evaluations.	§§63.1210(d), 63.1207(j), 63.1207(k), 63.1207(l), 63.8(e)(5), 63.9(h), 63.10(d)(2), 63.10(e)(2), 63.7(g)
Adjustment to time periods or postmark deadlines for submittal and review of required information.	§63.9(i)
Request to reduce the frequency of excess emissions and CMS performance reports.	§63.10(e)(3)(ii)
Request to waive recordkeeping or reporting requirements.	§63.10(f)
Notification to comply with the emission averaging requirements for cement kilns with in-line raw mills.	§§63.1204(d)(2)(iii), 63.1220(d)(2)(iii)
Notification to comply with the emission averaging requirements for preheater or preheater/precalciner kilns with dual stacks.	§§63.1204(e)(2)(iii), 63.1220(e)(2)(iii)
Extension of the compliance date for up to one year.	§§63.1206(b)(4), 63.1213, 63.6(i), 63.9(c)
Request to burn hazardous waste for more than 720 hours and for purposes other than testing or pretesting.	§63.1206(b)(5)(i)(C)
Submittal of PM CEMS correlation test plan for review and approval.	§63.1206(b)(8)(iii)(B)
Request approval for waiver of particulate matter and opacity standards and associated operating limits and conditions.	§63.1206(b)(8)(v)
Request approval of alternative emission standards for mercury, semivolatile metal, low volatile metal, and hydrogen chloride/chlorine gas for lightweight aggregate kilns or cement kilns.	§63.1206(b)(9), §63.1206(b)(10)
Request to comply with an alternative to the particulate matter standard (incinerators only).	§63.1206(b)(14)

Notifications	
Request to comply with the alternative to the interim standards for mercury (cement and lightweight aggregate kilns).	§63.1206(b)(15)
Request changes to the startup, shutdown, and malfunction plan.	§63.1206(c)(2)(ii)(C)
Request an alternative means of control for combustion system leaks.	§63.1206(c)(5)(i)(C)
Request other techniques to prevent fugitive emissions without use of instantaneous pressure limits.	§63.1206(c)(5)(i)(D)
Request to base initial compliance on data in lieu of a comprehensive performance test.	§63.1207(c)(2)
Request more than 60 days to complete a performance test.	§63.1207(d)(3)
Request a time extension if the Administrator fails to approve or deny the test plan.	§§63.1207(e)(3), 63.7(h)
Request to waive current operating parameter limits during pretesting for more than 720 hours.	§63.1207(h)(2)
Request a reduced hazardous waste feedstream analysis for organic hazardous air pollutants.	§63.1207(f)(1)(ii)(D)
Request to operate under a wider operating range for a parameter during confirmatory performance testing.	§63.1207(g)(2)(v)
Request up to a one-year time extension for conducting a performance test (other than the initial comprehensive performance test).	§63.1207(i)
Request more than 90 days to submit a Notification of Compliance after completing a performance test.	§63.1207(j)(4)
Request to burn hazardous waste for more than 720 hours and for purposes other than testing or pretesting.	§63.1207(l)(3)
Request approval of alternative monitoring methods for compliance with standards that are monitored with a CEMS and approval to use CEMS in lieu of operating parameter limits.	§§63.1209(a)(5), 63.8(f)
Request approval of alternatives to operating parameter monitoring requirements or a waiver of an operating parameter limit.	§63.1209(g)(1)
Request to extrapolate mercury feedrate limits.	§63.1209(l)(1)
Request to extrapolate semivolatile and low volatile metal feedrate limits.	§63.1209(n)(2)
Request to use data compression techniques to record data on a	§63.1211(d)

Notifications	
less frequent basis than required by §63.1209.	
Request and eligibility demonstration for alternative risk-based limits for total chlorine.	§63.1215(a)(1)(v)
Request to use an alternative CEMS span or range for CO, O ₂ , and HC CEMS.	Appendix to Subpart EEE, Section 6.3.5

Reports	
Compliance progress reports, if required as a condition of an extension of the compliance date granted under §63.6(i).	§63.10(d)(4)
Periodic startup, shutdown, and malfunction reports.	§63.10(d)(5)(i)
Immediate startup, shutdown, and malfunction reports.	§63.10(d)(5)(ii)
Excessive emissions and continuous monitoring system performance report and summary report.	§63.10(e)(3)
Startup, shutdown, and malfunction plan.	§63.1206(c)(2)(ii)(B), 63.6(e)(3)
Excessive exceedances reports.	§63.1206(c)(3)(vi)
Emergency safety vent opening reports.	§63.1206(c)(4)(iv)

A source must keep the following records:

Recordkeeping	
Documentation of information required for compliance, including data recorded by CMS, and copies of all notifications, reports, plans, and other documents submitted to the Administrator.	§§63.1200, 63.10(b) and (c)
Documentation of mode of operation changes for cement kilns with in-line raw mills.	§§63.1204(d)(1)(ii), §63.1220(d)(1)(ii)
Documentation of compliance with the emission averaging requirements for cement kilns with in-line raw mills.	§§63.1204(d)(2)(ii), 63.1220(d)(2)(ii)
Documentation of compliance with the emission averaging requirements for preheater or preheater/precalciner kilns with dual stacks.	§§63.1204(e)(2)(ii), 63.1220(e)(2)(ii)
Documentation of compliance with all applicable Clean Air Act Sections 112 and 129 requirements in lieu of the requirements of Subpart EEE when not burning hazardous waste.	§63.1206(b)(1)(ii)
Documentation that a change will not adversely affect compliance with the emission standards or operating requirements.	§63.1206(b)(5)(ii)
Documentation of compliance with the Destruction and Removal	§63.1206(b)(7)

Recordkeeping	
Efficiency (DRE) standard.	
Calculation of hazardous waste residence time.	§63.1206(b)(11)
Startup, shutdown, and malfunction plan.	§63.1206(c)(2)
Documentation of your investigation and evaluation of excessive exceedances during malfunctions.	§63.1206(c)(2)(v) (A)
Corrective measures for any automatic waste feed cutoff that results in an exceedance of an emission standard or operating parameter limit.	§63.1206(c)(3)(v)
Documentation and results of the automatic waste feed cutoff operability testing.	§63.1206(c)(3)(vii)
Documentation of waste feed ramp down procedures in the operating and maintenance plan.	§63.1206(c)(3)(viii)
Emergency safety vent operating plan.	§63.1206(c)(4)(ii)
Corrective measures for any emergency safety vent opening.	§63.1206(c)(4)(iii)
Method used for control of combustion system leaks.	§63.1206(c)(5)(ii)
Operator training and certification program.	§63.1206(c)(6)
Operation and maintenance plan.	§63.1206(c)(7)(iv)
Feedrate of mercury, semivolatile metals, low volatile metals, and total chlorine from all feedstreams.	§63.1207(m)
Documentation of quality assurance (QA) and quality control (QC) program and data collected as a result of the QA and QC program.	§ 63.1209(a)(2) and (d)(2), Appendix to Subpart EEE
Feedstream analysis plan.	§63.1209(c)(2)
CMS quality control program.	§§63.1209(d), 63.8(d)
Documentation that a substitute activated carbon, dioxin/furan formation reaction inhibitor, or dry scrubber sorbent will provide the same level of control as the original material.	§§63.1209(k)(6)(iii), 63.1209(k)(7)(ii), 63.1209(k)(9)(ii), 63.1209(o)(4)(iii)
Results of carbon bed performance monitoring.	§63.1209(k)(7)(i)(C)
Documentation of changes in modes of operation.	§63.1209(q)
Documentation of compliance.	§63.1211(c)

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CEMS for CO, O ₂ , PM, or Hg or CMS for opacity, or for temperature, pressure drop and liquid supply pressure.
Perform initial performance test, Reference Method 9 or 23A 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 collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.
Public Outreach

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

5(a) Agency Activities

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 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 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 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 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. The regulations allow much of the information requirements be kept in facility records rather than in submittals to EPA, thus reducing time and costs of providing the information. 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

All of the ICR requirements have clearly defined reporting schedules. For example, these include periodic reports such as comprehensive performance test plans and Notification of Compliances that are required to be submitted in a periodic, well defined, manner, such as quarterly or semiannually; one-time reports, including construction / reconstruction applications, alternative monitoring requests, extension of compliance waivers, and operating limit waivers; and intermittent reports, including AWFCO and ESV opening reports, test waivers, inhibitor and carbon substitution requests, and CEMS evaluation reports, which are submitted on an as needed basis with no defined schedule.

6. Estimating the Burden and Cost of the Collection

Table 1 below 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 62,500 (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 NESHAP 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	\$149.35 (\$71.12 + 110%)
Technical	\$112.98 (\$53.80 + 110%)
Clerical	\$54.81 (\$26.10 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, "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 Operating and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard(s) are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

(iii) Capital/Startup vs. Operation and Maintenance Costs

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	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)
Bag leak/PM Detectors	\$6,000	11.3	\$68,000	\$500	11.3	\$5,667
Correlation testing	\$18,000	0	\$0	\$2,000	1	\$2,000
CEMS (CO or THC and O ₂)	\$137,547	1	\$137,547	\$26,729	1	\$26,729
COMs/Opacity Monitoring	\$51,949	1	\$51,949	\$14,725	1	\$14,725
PM CEMS	\$158,000	1	\$158,000	\$34,165	1	\$34,165
CPMS	\$43,500	1	\$43,500	\$9,700	1	\$9,700
Comprehensive performance test	\$0	0	\$0	\$60,000	36	\$2,160,000
One-time D/F testing	\$0	0	\$0	\$5,000	1	\$5,000
Confirmatory performance test	\$0	0	\$0	\$6,000	33	\$198,000
Mailing Costs for Notifications and Reports						
Notifications, requests for approval, and reports	\$0	0	\$0	\$8	533	\$4,264
Additional notifications	\$0	0	\$0	\$1	106	\$106
Operator and Training Program						
Operator training and certification program	\$0	0	\$0	\$50	6	\$300
Public Notification Costs						
Public Notification of Intent to Comply	\$250	1	\$250	\$520	1	\$520
Recordkeeping Costs						
Recordkeeping	\$200	180	\$12,001	\$0	0	\$0
Total (Rounded)			\$427,000			\$2,460,000

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 \$427,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$2,460,000. 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 \$2,890,000. 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 \$421,000.

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

Managerial	\$64.80 (GS-13, Step 5, \$40.50 + 60%)
Technical	\$48.08 (GS-12, Step 1, \$30.05 + 60%)
Clerical	\$26.02 (GS-6, Step 3, \$16.26 + 60%)

These rates are from the Office of Personnel Management (OPM), 2017 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. These costs also include \$2,290 in mailing costs for notifications mailed to respondents to communicate Agency determinations. Details upon which these estimates are based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) (Renewal).

6(d) Estimating Respondent Universe & Total Burden & Costs Respondent Universe

Based on our research for this ICR, over the next three years, approximately 177 existing units at 153 facilities will be subject to these standards, with one new unit per year over the same period. The overall average number of respondents submitting reports in each year is calculated as one-third of the total respondents and is 60 respondents per year.

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

Number of Respondents (Total for 3-Year Period)					
	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	1	177	0	0	178
2	1	178	0	0	179
3	1	179	0	0	180
Average Total Respondents	1	178	0	0	179

Number of Respondents (Total for 3-Year Period)					
Avg. Respondents with Reporting & Recordkeeping each year ²	1	59	0	0	60

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

² The average number of respondents conducting reporting and recordkeeping activities in each year is calculated as 1/3 of the total respondent universe. Figures may not add exactly due to rounding.

Column D is subtracted to avoid double-counting respondents. As shown above, the total Number of Respondents over the three-year period of this ICR is 179. The average number of respondents conducting reporting and recordkeeping activities in each year is 60.

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

(A) Information Collection Activity	(B) No. Responses Per Year	(C) Number of Existing Respondents That Keep Records But Do Not Submit Responses	(D) Total Annual Responses (D) = (B+C)
<i>Cement kilns with in-line raw mills emissions averaging requirements</i>	1	0	1
<i>Extension of compliance with emission standards and compliance report</i>	20	0	20
<i>Changes in design, operation, or maintenance</i>	30	0	30
<i>Compliance with alternative MACT standards when not burning Hazardous Waste</i>	30	3	33
<i>Applicability of particulate matter and opacity standards during particulate matter CEMS correlation tests</i>	13	0	13
<i>Alternative hydrocarbon monitoring location for short cement kilns burning haz waste at location other than hot end of kiln</i>	0	0	0
<i>Startup, shutdown, and malfunction plan and excessive emissions report</i>	13	0	13
<i>Automatic waste feed cutoff exceedances report, testing results, and documentation</i>	6	90	96
<i>Automatic waste feed cutoff operating and maintenance plan ramp down procedures</i>	0	120	120
<i>ESV openings – report and operating plan</i>	39	13	51
<i>Combustion system leaks – request for alternative means of control</i>	30	30	60
<i>Operator training and certification program</i>	0	60	60
<i>Operation and maintenance plan</i>	11	18	30
<i>Comprehensive performance test requirements, D/F testing, and extensions</i>	55	0	55
<i>Confirmatory performance test requirements</i>	33	0	33
<i>Data in lieu of the initial comprehensive performance test</i>	6	0	6
<i>Notification of performance test and CMS performance evaluation and approval of test plan</i>	97	0	97
<i>Notification of compliance and time extension</i>	66	0	66
<i>Waiver of performance tests and request for time extension</i>	12	0	12
<i>Feedstreams Analysis Plan</i>	0	0	0
<i>Alternative compliance monitoring requirements for standards other than those monitored with a CEMS</i>	6	0	6
<i>Use of CEMS in lieu of OPLs; or alternative methods in lieu of CEMS</i>	0	0	0

<i>Mercury, request to extrapolate feedrate limits and semivolatile metal and low volatile metal feedrate limits</i>	12	0	12
<i>Dioxins and furans, operating records</i>	0	0	0
<i>Total chlorine, CMS quality control plan and operating records</i>	6	0	6
<i>Operating under different modes of operation</i>	0	30	30
<i>Notification of performance evaluation</i>	30	0	30
<i>Additional notification requirements for CMS</i>	30	0	30
<i>Submission of site-specific performance evaluation test plan</i>	36	0	36
<i>Reporting results of CMS performance evaluations</i>	36	0	36
<i>Notice of intent to comply</i>	5	0	5
<i>Initial notification, applications of construction and reconstruction</i>	3	0	3
<i>Adjustment to time periods or postmark deadlines</i>	15	0	15
<i>Request to reduce frequency of excess emissions and continuous monitoring system performance results</i>	6	0	6
<i>Periodic and immediate startup, shutdown, and malfunction reports</i>	21	0	21
<i>Excess emissions and monitoring system performance report and summary report</i>	60	0	60
<i>Request for approval to use data compression techniques</i>	15	0	15
<i>Extension of the compliance date</i>	12	0	12
<i>Performance Evaluation Report</i>	0	0	0
<i>Request to use an alternative CEMS span</i>	0	0	0
<i>Request for alternative risk-based chlorine standards</i>	15	0	15
<i>General recordkeeping requirements 63.10(b)</i>	0	60	60
<i>Additional recordkeeping requirements for source with CMS</i>	0	60	60
<i>Waiver of recordkeeping and reporting requirements</i>	1	0	1
<i>Documentation of Compliance</i>	0	60	60
<i>Quality control (QC) requirements</i>	0	60	60
<i>Quality assurance (QA) requirements</i>	0	60	60
<i>Calibration drift (CD) and zero drift (ZD) assessment and daily system audit</i>	0	120	120
		Total	1,555

The number of Total Annual Responses is 1,555.

The total annual labor costs are \$6,670,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) (Renewal).

6(e) Bottom Line Burden Hour and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 62,500 hours (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) (Renewal).

Labor hour estimates are provided for technical, managerial, and clerical tasks. The burdens for managerial tasks include the time for managers to review and approve reports. Clerical burdens include time to proofread reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 40 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$2,890,000. 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 8,420 labor hours at a cost of \$421,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) (Renewal).

Labor hour estimates are provided for technical, managerial, and clerical tasks. The burdens for managerial tasks include the time for managers to review and approve reports. Clerical burdens include time to proofread reports, make copies and maintain records.

6(f) Reasons for Change in Burden

There is an adjustment decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The adjustment decrease in burden is due to a decrease in the number of respondents based on more accurate estimates of the number of existing and new respondents as provided by the Agency and industry consultations. The decrease in burden is also a result of the removal of burden items related to requirements that are not associated with: these standards, testing and installation activities that are not information collection activities, submittal of certain conditional or optional information that is not required by the rule, and one-time activities that have been completed. These changes are further discussed below. These changes also result in an adjustment decrease in the number of responses. The number of responses also reflects updates to clarify those responses related to reporting and that related to recordkeeping activities where reports are not submitted.

There is an adjustment increase in the total capital and O&M costs based on the revised estimates of the number of new respondents. As discussed below, because this ICR assumes one new HWC unit per year, we have included capital and O&M costs for CO and O₂ CEMS, PM CEMS, COMs, and CMS. These items were not included in the previously-approved ICR because it was assumed that existing sources had the equipment required to meet the standards already installed.

There have been a number of additional revisions to this ICR from the most recently-approved ICR. These revisions include updates to the supporting statement and burden tables to conform to the Agency's standardized ICR format. The updates to the supporting statement focus on streamlining the information included in this ICR to focus on the relevant recordkeeping and reporting requirements, and minor textual revisions to clarify the Agency's information collection process.

For example, we have clarified Section 3(a) “Nonduplication” and Section 3(c) “Consultations” to clarify the Agency’s processes to avoid duplication of the information collected under this ICR, and to provide a description of the Agency’s processes for conducting consultations and the information received. We have also revised Section 3(d) “Effects of Less Frequent Collection” to clarify the rationale for the current collection frequency and outline the impacts of less frequent collection. We have corrected Section 3(e) “General Guidelines” to reflect that these standards include a five-year records retention requirement.

Section 4(b) “Information Requested” has been substantially revised to reduce the long form description of the standards included in the most recently approved ICR and to condense the data item requirements into separate tables for “Notifications”, “Reports”, and “Recordkeeping”, consistent with the Agency’s standardized ICR format. Respondent activities are similarly listed in a new table in Section 4(b)(ii). The data items and activities listed in these tables are based on the information included in the most recently approved ICR and continue to correspond with the notification, reporting, and recordkeeping requirements detailed below in Table 1: Annual Respondent Burden and Cost - NESHAP for Hazardous Waste Combustors (40 CFR 63, Subpart EEE) Renewal. These edits help provide succinct references to the rule requirements and ease the readability of the information collection.

Section 5(a) “Agency Activities” has also been revised to remove the long form descriptions of agency responsibilities and to replace these descriptions with a simplified table of activities. The activities previously listed in the most recently approved ICR are instead summarized in a revised table and correspond with the agency review activities detailed below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) (Renewal). We have also updated Section 5(b) “Collection Methodology and Management” to clarify how the information collected is reported by state and local governments to the Agency’s ICIS Air database for management.

Section 6 of the previously-approved ICR has been updated to conform to the Agency’s standardized ICR format and explain changes to the labor rates, number of respondents, calculation of capital and operation and maintenance costs, and bottom line burden hours and costs. As discussed in Section 6(b), the labor rates used in this ICR include updated Managerial, Technical, and Clerical rates from the Bureau of Labor Statistics. To conform the labor hours included in the previously-approved ICR with these updated labor rates, we have consolidated hours included for additional labor categories, including Legal and Consultant hours, into the Managerial and Technical hours, respectively. The consolidation of Legal to Managerial and Consultant to Technical hours preserves the hourly labor assumptions for individual burden items and assigns a similar labor rate. We have also removed a reference to separate labor rates for respondent activities for State agencies which were previously assigned to burden associated with agency review of information, as there is no requirement to calculate burden separately for State agency review activities.

We have revised Section 6(b)(ii) and (iii) to delineate the capital and operation maintenance costs for respondents in a table to conform to the Agency’s standardized ICR format. The “Capital/Startup vs. Operation and Maintenance (O&M) Costs” table clearly delineates the elements of “burden” with capital or O&M costs. Because the revised inventory

of respondents assumes a growth rate of one new HWC unit per year, we have included capital and O&M costs for CO and O₂ CEMS, PM CEMS, COMs, and CMS, which were not included in the previously approved ICR.

Section 6(c) “Estimating Agency Burden and Cost” has been revised to update the labor rates to include updated Managerial, Technical, and Clerical rates from the Bureau of Labor Statistics. To conform the labor hours included in the previously-approved ICR with these updated labor rates, we have consolidated hours included for additional labor categories, including Legal and Consultant hours, into the Managerial and Technical hours, respectively.

We have revised Section 6(d) to clarify how the number of respondents is calculated over the three-year period of this ICR. We have also added a table that provides the number of responses, and that clarify the responses related to reporting burden and those related to recordkeeping activities unrelated to the submittal of reports. We have streamlined this section to remove a lengthy text description which discussed the type and number of sources for which each of the specific ICR requirements is estimated to apply; these assumptions are now included in Table 1: Annual Respondent Burden and Cost – NESHAP for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) (Renewal).

We have reformatted and revised Table 1: Annual Respondent Burden and Cost – NESHAP for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) (Renewal) to streamline the requirements for respondents. The revised table is formatted to delineate the requirements and associated burden by the type of reporting or recordkeeping activity, separate out capital and operation and maintenance costs (now provided in Section 6(b)), consolidate labor hours for Managerial, Technical, and Clerical tasks as discussed above, and adjust the number of respondents to reflect changes in inventory and expected activities. We have analyzed each burden item to classify the item as a recordkeeping and reporting requirement and remove requirements that are not considered information collection activities under the Paperwork Reduction Act. For example, we removed line items or labor hours that were designated as “complying with the applicable operating parameter limit” for various pollutants because compliance with the standards is not a recordkeeping or reporting activity, and there is no actual “burden” associated with this. We have also removed burden related to the conduct of performance tests or the installation of CEMS, COMs, or CPMS, because these testing and installation activities are not recordkeeping or reporting requirements, and are included in the capital and operation and maintenance costs. Similarly, we removed several line items for burden associated with the preparation and submittal of “additional relevant information, if requested by the EPA”. These line items were removed because they were related to either conditional or optional information that are not required by the rule; “burden” is not typically calculated for this type of submittal. We removed a one-time requirement that allowed for facilities to use previous DRE test results to document compliance with the DRE standard. We also removed the “burden” for requirements for storage and transfer from the HCl Production Furnace NESHAP (40 CFR Part 63 Subpart NNNNN), because these requirements are not associated with 40 CFR Part 63, Subpart EEE). Finally, we updated the number of respondents for some burden items based on mathematical errors and discrepancies identified between the prior table and the assumptions detailed in the supporting statement.

Similarly, we revised Table 2: Average Annual EPA Burden and Cost – NESHAP for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) (Renewal) to streamline the requirements for the federal government. As discussed above, we removed separate Agency burden estimates for activities for State agencies which were previously associated with Agency review of information, as there is no requirement to calculate burden separately for State agency review activities. The revised table consolidates labor hours for Managerial, Technical, and Clerical tasks as discussed above; adjusts the number of respondents to reflect changes in inventory; and revises the burden activities to correspond to the changes to Table 1.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 40 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 neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA’s regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on EPA '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–2018–0130. 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-2018-0130 and OMB Control Number 2050-0171 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 – NESHAP for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) (Renewal)

INFORMATION COLLECTION ACTIVITY	Person Hours Per Year (by Labor Category)			Total Person Hours Per Respondent	Total Labor Costs Per respondent	Total Hours and Costs		
	Manager \$149.35	Technical \$112.98	Clerical \$54.81			# of Respondents ^a	Total Hours	Total Labor Cost ^b
1. Applications								
2. Survey and Studies								
3. Reporting requirements								
A. Familiarization with the rule^c	0.0	4.0	0.0	4.0	\$451.92	50.9	203.5	\$22,987.88
B. Required Activities								
Operation and maintenance plan (63.1206 (c)(7))								
Request for approval for establishing set points with extrapolation for PM detectors ^d	0.0	10.0	1.0	11.0	\$1,184.61	1	11	\$1,184.61
Recommend alternative OPLs for units with ESP or IWSs ^e	0.0	10.0	1.0	11.0	\$1,184.61	6	66	\$7,107.66
Feedstreams Analysis Plan (63.1209(c)(2)) ^f								
Monitor and record feedrates	0.0	0.5	0.0	0.5	\$56.49	1	1	\$56.49
Perform waste analysis four time annually (non-commercial facilities)	0.0	8.0	0.0	8.0	\$903.84	1	8	\$903.84
Perform waste analysis 50 times annually (commercial facilities)	0.0	100.0	0.0	100.0	\$11,298.00	1	100	\$11,298.00
Quality control program (63.1209(d) and 63.8(d)) ^g								
Develop and implement a CMS QC program	5.0	64.0	10.0	79.0	\$8,525.58	30	2,370	\$255,767.40
Conduct of performance evaluation and performance evaluation dates (63.1209(d) and 63.8(e)(4)) ^h								
Conduct a CMS performance evaluation	4.0	40.0	4.0	48.0	\$5,335.85	36	1,728	\$192,090.53
Quality control (QC) requirements (63, Subpart EEE Appendix, Section 1.1) ⁱ								
Develop and implement a QC program	8.0	140.0	12.0	160.0	\$17,669.74	30	4,800	\$530,092.08
Revise program, if necessary	1.0	8.0	1.0	10.0	\$1,108.00	6	60	\$6,648.01
Quality assurance (QA) requirements (63, Subpart EEE Appendix, Section 1.1) ^j								
Develop and implement a QA program	8.0	120.0	12.0	140.0	\$15,410.14	60	8,400	\$924,608.16
Revise or update plan, if necessary	1.0	8.0	1.0	10.0	\$1,108.00	6.6	66	\$7,312.81
Performance Evaluation (Appendix EEE, Section 5) ^k								
Conduct ACA, RATA, or interference response test as applicable	0.0	0.0	0.0	0.0	\$0.00	0	0	\$0
C. Create Information								

D. Gather Information									
E. Write Report									
Cement kilns with in-line raw mills (63.1220(d)) ^l									
Prepare and submit notification of compliance using the emission averaging requirements for cement kilns with in-line raw mills	1.0	3.0	1.0	5.0	\$543.10	1	5	\$543.10	
Extension of compliance with emission standards (63.1206(b)(4), 63.6(i), 63.1213, and 63.9(c)) ^m									
Prepare and submit the request for an extension of compliance	2.0	10.0	4.0	30.0	\$1,647.74	10	162.8	\$16,763.20	
Prepare and submit a progress report, as applicable	1.0	5.0	2.0	15.0	\$823.87	10	81.4	\$8,381.60	
Changes in design, operation, or maintenance (63.1206(b)(5)) ⁿ									
Prepare and submit a notification of change in design, operation, or maintenance	2.0	52.0	8.0	62.0	\$6,612.14	30	1,860	\$198,364.32	
Compliance with alternative MACT standards when not burning Hazardous Waste(63.1206(b)(1)(ii)) ⁿ									
Revise, as necessary, the performance test plan, Documentation of Compliance, and start-up, shutdown, and malfunction plan to reflect changes that will not adversely affect compliance with emission standards or operating requirements.	1.0	6.0	4.0	11.0	\$1,046.47	30	330	\$31,394.16	
Applicability of particulate matter and opacity standards during particulate matter CEMS correlation tests (63.1206(b)(8)) ^o									
Prepare and submit a particulate matter CEMS correlation test plan	2.0	16.0	2.0	20.0	\$2,216.00	13	260	\$28,808.05	
Request additional time extension for waiving PM and Opacity stnds	0.0	0.1	0.0	0.1	\$11.30	0	0	\$0	
Alternative hydrocarbon monitoring location for short cement kilns burning haz waste at location other than hot end of kiln ^p									
Prepare and submit a petition for alternative monitoring location and emission standards	1.0	18.0	0.5	19.5	\$2,210.40	0	0	\$0	
Startup, shutdown, and malfunction plan (63.1206(c)(2) and 63.6(e)(3)) ^q									
Submit for review and approval by EPA	1.0	10.0	2.0	13.0	\$1,388.77	7	91	\$9,721.40	
Excessive emissions reporting	3.0	11.0	1.0	15.0	\$1,745.65	6	90	\$10,473.88	
Automatic waste feed cutoff (63.1206(c)(3)) ^q									
Develop and submit a written report documenting excessive exceedances and result of the investigation and corrective measures taken	2.0	16.0	0.5	18.5	\$2,133.79	6	111	\$12,802.73	
ESV openings (63.1206(c)(4)) ^r									

Develop and submit a written report documenting the ESV opening and result of the investigation and corrective measures taken, and whether ESV event caused non-compliance	2.0	16.0	0.5	18.5	\$2,133.79	39	712.3	\$82,150.88
Combustion system leaks (63.1206(c)(5)) ^s								
Prepare and submit a request to use an alternative means of control to provide control of combustion system leaks	0.5	10.0	0.5	11.0	\$1,231.88	30	330	\$36,956.43
Operation and maintenance plan (63.1206 (c)(7)) ^t								
Notify EPA if alarm limit is exceeded more than 5% of the time in a 6-month block period	5.0	40.0	0.0	45.0	\$5,265.96	11.3	510	\$59,680.88
Comprehensive performance test requirements (63.1207(b)(1)) ^{h, u, v}								
Submittal of comprehensive performance test no later than 61 months after the date of commencing the previous comprehensive performance test	2.0	40.0	4.0	46.0	\$5,037.14	36	1,656	\$181,337.18
Submittal of one-time D/F testing for units w/out numerical D/F stnd	0.5	10.0	1.0	11.5	\$1,259.29	1	11.5	\$1,259.29
Request 60-day extension to complete testing	1.0	1.0	1.0	3.0	\$317.14	12	36	\$3,805.70
Request additional time for waiving OPLs for pretesting	1.0	1.0	1.0	3.0	\$317.14	6	18	\$1,902.85
Confirmatory performance test requirements (63.1207(b)(2)) ^w								
Perform the confirmatory performance test no later than 31 months after the date of commencing the previous comprehensive performance test	2.0	40.0	4.0	46.0	\$5,037.14	33	1,518	\$166,225.75
Data in lieu of the initial comprehensive performance test (63.1207(c)(2)) ^x								
Prepare and submit a request that previous emissions test data serve as documentation of conformance with emission standards	1.0	8.0	2.0	11.0	\$1,162.81	6	66	\$6,976.87
Notification of performance test and CMS performance evaluation and approval of test plan CMS performance evaluation plan (63.1207(e)) ^{k, y}								
Prepare and submit a notification of intention to conduct a performance test	1.0	4.0	1.0	6.0	\$656.08	36	216	\$23,618.95
Prepare and submit the rescheduled notification of intent to conduct a performance test, if test is postponed	1.0	4.0	1.0	6.0	\$656.08	3.6	21.6	\$2,361.90
Prepare and submit a site-specific comprehensive performance test plan	7.0	110.0	12.0	129.0	\$14,130.98	36.0	4,644	\$508,715.42
Prepare and submit the site-specific confirmatory performance test plan	2.0	30.0	10.0	42.0	\$4,236.20	21.6	907.2	\$91,502.01

Notification of compliance (63.1207(j), 63.9(h), 63.7(g), 63.10(d)(2) and 63.1210(d)) ^z								
Prepare and submit a notification of compliance	10.0	104.0	16.0	130.0	\$14,120.40	60	7,800	\$847,224
Prepare and submit a written request for a time extension, if necessary	0.5	0.0	1.0	1.5	\$129.49	6	9	\$776.92
Waiver of performance tests and request for time extension (63.1207(h) and 63.1207(m)) ^z								
Prepare and submit a request for a 6-month time extension for conducting a performance test if test plan has not been approved	2.0	24.0	2.0	28.0	\$3,119.84	6	168	\$18,719.06
Notify public of request for time extension	3.0	2.0	1.0	6.0	\$728.83	6	36	\$4,372.96
Feedstreams Analysis Plan (63.1209(c)(2))								
Submit the plan for review and approval, if requested by the EPA	0.0	0.0	0.5	0.5	\$27.41	0	0	\$0.00
Alternative compliance monitoring requirements for standards other than those monitored with a CEMS (63.1209(g)(1)) ^{aa}								
Prepare and submit an application for use of an alternative monitoring method	8.0	100.0	10.0	118.0	\$13,040.92	6	708	\$78,245.50
Prepare and submit an application to waive an operating limit	4.0	24.0	2.0	30.0	\$3,418.55	0	0	\$0
Use of CEMS in lieu of OPLs; or alternative methods in lieu of CEMS (63.1209(a)(5)) ^{aa}								
Prepare and submit an application for use of an alternative monitoring method	8.0	100.0	10.0	118.0	\$13,040.92	0	0	\$0
Prepare and submit an application to waive an operating limit	4.0	24.0	2.0	30.0	\$3,418.55	0	0	\$0
Prepare and submit request to extrapolate mercury feedrate limits ^{bb}	0.5	4.0	1.0	5.5	\$581.41	6	33	\$3,488.44
Prepare and submit request to extrapolate semivolatile metal and low volatile metal feedrate limits ^{bb}	0.5	4.0	1.0	5.5	\$581.41	6	33	\$3,488.44
Submit the CMS quality control program for inspection, if requested by the EPA ^{cc}	0.0	0.0	0.5	0.5	\$27.41	6	3	\$164.43
Notification of performance evaluation (63.1209(d), 63.8(e)(2)) ^g								
Prepare and submit a notification of CMS performance evaluation	1.0	4.0	1.0	6.0	\$656.08	30	180	\$19,682.46
Additional notification requirements for CMS (63.9(g)(2) and (3)) ^g								
Prepare and submit additional notification requirements for source with CMS	1.0	4.0	1.0	6.0	\$656.08	30	180	\$19,682.46
Submission of site-specific performance evaluation test plan (63.1209(d) and 63.8(e)(3)) ^h								
Develop and submit a CMS site-specific performance evaluation test plan	10.0	44.0	8.0	62.0	\$6,903.12	36	2,232	\$248,512.32

Reporting results of CMS performance evaluations (63.10(e)(2)) ^h								
Prepare and submit a written report of the results of the CMS performance evaluation	1.0	36.0	6.0	43.0	\$4,545.49	36	1,548	\$163,637.71
Prepare and submit written reports of the results of the COMS performance evaluation, as applicable ^{dd}	1.0	18.0	4.0	23.0	\$2,402.23	0	0	\$0
Notice of intent to comply 63.1206(b)-(d) ^{ee}								
Prepare draft NIC	9.0	45.0	3.0	57.0	\$6,592.70	1	57	\$6,592.70
Notify public about meeting and draft NIC	1.0	3.0	2.0	6.0	\$597.91	1	6	\$597.91
Conduct public meeting	4.0	20.0	3.0	27.0	\$3,021.44	1	27	\$3,021.44
Prepare and submit final NIC	2.0	35.0	3.0	40.0	\$4,417.43	1	40	\$4,417.43
Prepare progress report	3.0	30.0	3.0	36.0	\$4,001.89	1	36	\$4,001.89
Initial notification 63.9(b) and 63.5(d) ^{ff}								
Prepare and submit initial notification	2.0	8.0	1.0	11.0	\$1,257.35	1	11	\$1,257.35
Prepare and submit an application of approval of construction as applicable	7.0	32.0	0.5	39.5	\$4,688.23	1	39.5	\$4,688.23
Prepare and submit an application of approval of reconstruction as applicable	7.0	32.0	0.5	39.5	\$4,688.23	1	39.5	\$4,688.23
Adjustment to time periods or postmark deadlines for submittal and review of required communications 63.9(j) ^{gg}								
Prepare and submit a request for an adjustment to a time period or postmark deadline	0.3	2.0	0.5	2.8	\$290.70	15	41.3	\$4,360.55
Request to reduce frequency of excess emissions and continuous monitoring system performance results 63.10(e)(3)(ii) ^{hh}								
Prepare and submit a request to reduce the frequency of excess emissions and CMS performance reports	0.3	2.0	0.5	2.8	\$290.70	6	16.5	\$1,744.22
Waiver of recordkeeping and reporting requirements ⁱⁱ								
Prepare and submit a waiver of recordkeeping and reporting	0.3	2.0	0.5	2.8	\$290.70	0.6	1.7	\$174.42
Startup, shutdown, and malfunction reports 63.10(d)(5)(i) and (ii) ^{jj}								
Prepare and submit a periodic startup, shutdown, and malfunction report, as applicable	0.3	5.0	1.0	6.3	\$657.05	15	93.8	\$9,855.72
Prepare and submit an immediate startup, shutdown, and malfunction report, as applicable	0.3	5.0	1.0	6.3	\$657.05	6	37.5	\$3,942.29
Excess emissions and continuous monitoring system performance report and summary report 63.10(e)(3) ^{kk}								
Prepare and submit an excess emissions and monitoring system performance report and summary report	0.3	4.0	2.0	6.3	\$598.88	60	375	\$35,932.68
Data compression ^{ll}								

Prepare and submit request for approval to use data compression techniques to record data on a less frequent basis than required by Section 63.1209	0.3	2.0	0.5	2.8	\$290.70	15	41.3	\$4,360.55
Extension of the compliance date to install pollution prevention or waste minimization controls (63.1213) ^{mm}								
Prepare and submit the request for an extension of compliance date due to installation of pollution prevention controls	4.0	24.0	2.0	30.0	\$3,418.55	6	180	\$20,511.29
Prepare and submit the request for an extension of compliance date due to waste minimization controls	4.0	24.0	2.0	30.0	\$3,418.55	6	180	\$20,511.29
Performance Evaluation (Appendix EEE, Section 5) ^k								
Prepare and submit a written report of the results of the performance evaluation	0.3	1.0	0.0	1.3	\$150.32	0	0	\$0
Use of alternative CEMS spans (63, Subpart EEE Appendix, Section 6.3.5) ⁿⁿ								
Prepare and submit a request to use an alternative CEMS span	0.5	25.0	1.0	26.5	\$2,953.99	0	0	\$0
Alternative risk based chlorine standards ^{oo}								
Make request to use risk based chlorine stnds	2.0	40.0	5.0	47.0	\$5,091.95	15	705	\$76,379.31
Subtotal for Reporting Requirements							46,309	\$5,058,836
4. Recordkeeping requirements								
A. Familiarization with Regulatory Requirements (see 3A)								
B. Plan activities (see 3B)								
C. Implement activities (see 3B)								
D. Develop record system								
E. Time to enter information								
Document in operating record compliance with the emission averaging requirements for cement kilns with in-line raw mills ^l	0.0	0.5	0.5	1.0	\$83.90	1	1	\$83.90
Compliance with alternative MACT standards when not burning Hazardous Waste(63.1206(b)(1)(ii)) ^{pp}								
Document in the operating record compliance with applicable CAA requirements in lieu of the requirements of Subpart EEE	0.0	4.0	0.0	4.0	\$451.92	3	12	\$1,355.76
Document design, operation, or maintenance change in operating record if it is determined that the change will not adversely affect compliance with emission standards or operating requirements ⁿ	0.0	1.0	0.0	1.0	\$112.98	30	30	\$3,389.40
Hazardous waste residence time ^{qq}								
Document hazardous waste residence time in operating	0.0	4.0	0.5	4.5	\$479.33	1	4.5	\$479.33

record								
Startup, shutdown, and malfunction plan (63.1206(c)(2) and 63.6(e)(3)) ^q								
Develop or revise a startup, shutdown, and malfunction plan	6.0	82.0	8.0	96.0	\$10,598.95	7	672	\$74,192.66
Automatic waste feed cutoff (63.1206(c)(3)) ^r								
Investigate the cause of any AWFCO, take appropriate corrective measures to minimize future AWFCOs, and record the findings and corrective measures in the operating record	2.0	16.0	0.5	18.5	\$2,133.79	120	2,220	\$256,054.68
Test the AWFCO system and associated alarms weekly and document and record AWFCO operability test procedures and result in the operating record	0.0	1.5	0.0	1.5	\$169.47	30	45	\$5,084.10
Document in the operating record that weekly inspections will unduly restrict or upset operations	0.0	0.5	0.0	0.5	\$56.49	30	15	\$1,694.70
Test the AWFCO system monthly, and record results in operating record	0.0	1.5	0.0	1.5	\$169.47	30	45	\$5,084.10
Document in the operating record the operating and maintenance plan ramp down procedures, as applicable	0.5	6.0	1.0	7.5	\$807.37	120	900	\$96,883.92
ESV openings (63.1206(c)(4)) ^t								
Develop an ESV operating plan and keep it in the operating record	2.0	20.0	1.0	23.0	\$2,613.11	12.8	295.2	\$33,534.96
Investigate the cause of the ESV opening, take appropriate corrective measures to minimize such future ESV openings, record the findings and corrective measures in the operating record, and determine if ESV caused non-compliance	2.0	16.0	0.5	18.5	\$2,133.79	39	712.3	\$82,150.88
Combustion system leaks (63.1206(c)(5)) ^s								
Specify in the comprehensive test workplan and the notification of compliance the methods used to control combustion system leaks	0.0	0.3	0.0	0.3	\$28.25	30	7.5	\$847.35
Operation and maintenance plan (63.1206 (c)(7)) ^{ss, t}								
Prepare an operation and maintenance plan and put in the operating record	5.0	295.0	10.0	310.0	\$34,623.96	7	2,170	\$242,367.72
Document alarm limit exceedances and corrective action taken.	5.0	40.0	0.0	45.0	\$5,265.96	11.3	510	\$59,680.88
Feedstreams Analysis Plan (63.1209(c)(2)) ^f								
Develop and implement a feedstream analysis plan and put plan in the operating record	1.0	5.0	1.0	7.0	\$769.06	1	7	\$769.06
Dioxins and furans (63.1209(k)) ^{tt}								
Document in the operating record procedures used to ensure carbon bed lifetime is being sufficiently monitored								

and controlled	0.0	0.3	0.0	0.3	\$28.25	0	0	\$0
Document in the operating record that replacement carbon will provide the same level of control as original carbon used during the performance test	0.0	0.3	0.0	0.3	\$28.25	0	0	\$0
Document in the operating record that replacement inhibitor will provide the same level of control as the original inhibitor used during the performance test	0.0	0.3	0.0	0.3	\$28.25	0	0	\$0
Total chlorine (hydrochloride and chlorine gas) (63.1209(o)) ^{tt}								
Document in the operating record that replacement sorbent will provide the same level of control as the original sorbent used during the performance test	0.0	0.3	0.0	0.3	\$28.25	0	0	\$0
Operating under different modes of operation (63.1207(g) and 63.1209(r)) ^{g, uu}								
Document the mode of operation in the operating record, if a source has tested under two or more operating modes	0.0	0.3	0.0	0.3	\$28.25	30	7.5	\$847.35
Keep the CMS quality control program on record for the life of the affected source or until the affected source is no longer subject to the provisions of 40 CFR Part 63	0.0	0.0	0.5	0.5	\$27.41	30	15	\$822.15
General recordkeeping requirements 63.10(b) ^{vv}								
Retain files of all information (including all reports and notifications) for at least 5 years	0.0	0.0	40.0	40.0	\$2,192.40	60	2,400	\$131,544
Additional recordkeeping requirements for source with CMS (63.10(c)) ^{vv}								
Maintain additional records for continuous monitoring systems	0.0	0.0	20.0	20.0	\$1,096.20	60	1,200	\$65,772
Documentation of Compliance 63.1211(d) ^{www}								
Develop a Documentation of Compliance and include it in the operating record	1.0	10.0	2.0	13.0	\$1,388.77	60	780	\$83,326.32
Quality control (QC) requirements (63, Subpart EEE Appendix, Section 1.1) ^j								
Record program in operating record	0.0	20.0	0.0	20.0	\$2,259.60	60	1,200	\$135,576
Quality assurance (QA) requirements (63, Subpart EEE Appendix, Section 1.1) ^j								
Record plan in the operating record	0.0	10.0	0.0	10.0	\$1,129.80	60	600	\$67,788
Calibration drift (CD) and zero drift (ZD) assessment and daily system audit (63, Subpart EEE Appendix, Section 4) ^j								
Check, record, and quantify the ZD and the CD at least once daily (330 times per year)	0.0	0.0	0.0	0.0	\$0.00	60	0	\$0
Retain all CEMS measurements in the operating record for at least 5 years	0.0	1.0	0.0	1.0	\$112.98	60	60	\$6,778.80

F. Train personnel								
Operator training and certification (63.1206(c)(6)) ^{yy}								
Develop an operator training and certification program	6.8	136.0	13.6	156.4	\$17,126.29	6	938.4	\$102,757.74
Implement an operator training and certification program	0.6	12.0	1.2	13.8	\$1,511.14	60	828	\$90,668.59
Keep a record of the plan and records of certification and training activities	0.4	8.0	0.8	9.2	\$1,007.43	60	552	\$60,445.73
G. Audits								
<i>Subtotal for Recordkeeping Requirements</i>							16,227	\$1,609,980
TOTAL LABOR BURDEN AND COSTS (ROUNDED) ^z							62,500	\$6,670,000
TOTAL CAPITAL AND O&M COST (ROUNDED) ^{zz}								\$2,890,000
GRAND TOTAL (ROUNDED) ^{zz}								\$9,560,000

- ^a The total number of respondents estimated over the next three years is based on approximately 177 existing units at 153 facilities that are subject to the standard, with one new unit per year over the same period. The overall average number of respondents submitting reports in each year is calculated as one-third of the total respondents and is 60 respondents per year.
- ^b This ICR uses the following labor rates: \$149.35 per hour for Executive, Administrative, and Managerial labor; \$112.98 per hour for Technical labor, and \$54.81 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017 "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.
- ^c Assumes respondents take 4 hours to refamiliarize themselves with rule requirements each year.
- ^d Assumes 1 respondent per year will request approval for establishing set points with extrapolation for PM detectors.
- ^e It is estimated that of the sources reporting annually with ESPs or IWSs, 90% will request to use operating parameter limits instead of continuous particulate detectors.
- ^f Provides for one-time requirement for development and implementation of feedstream analysis plans for new respondents.
- ^g As part of the comprehensive performance test, HWCs will submit a CMS quality control program, notification of performance evaluation and additional notification requirements; we estimate that 50% of sources have submitted a CMS quality control program at this time.
- ^h HWCs are also required to submit a performance evaluation test plan, and conduct a CMS performance test. We estimate 60% of sources would submit test plans and conduct performance testing along with their comprehensive performance testing.
- ⁱ Assumes that respondents will develop and implement a QC program for 50% of units, and 10% will submit a revised QC program.
- ^j All sources must meet the QA requirements for CEMS. Assumes all sources will develop a QA program and 11% will submit a revised QA program.
- ^k Burden for performance evaluations is included in the notification of performance test and CMS performance evaluations.
- ^l We estimate that 1 cement kiln with an in-line kiln raw mill will comply with the emission averaging requirements for kilns of this type. Thus, they will conduct a performance test when the raw mill is on-line and when the mill is off-line, and include the averaging procedures in their Notification of Compliance and operating record.
- ^m Assumes 20% of all facilities operating an HWC will apply for an extension each year.
- ⁿ It is estimated that 50% of the sources reporting annually will be making design, operation, and maintenance changes to comply with the MACT rule and document change in operating record.
- ^o It is anticipated that 39 sources (among all HWC) will conduct PM CEMS correlation testing over the 3-year period of this ICR and request a waiver of PM and opacity standards during the testing. It is estimated that none of these sources will request an extension of the 96 hours allowed for the waiver.
- ^p Assumes no respondents will petition for an alternative monitoring location or emission standards.
- ^q Assumes 1 new respondent and 10% of existing respondents reporting annually will develop or revise the SSM plan and resubmit the plan for approval, and 10% of respondents would be required to submit excess emissions reports.
- ^r It is estimated that 50% of hazardous waste incinerators reporting annually have ESVs, and will develop an ESV operating plan. On average, each unit will have 3 ESV openings per year.

s It is estimated that respondents will request approval for 50% of all sources for use of an alternative means to provide control of combustion system leaks (control through a positively sealed combustion chamber).

t Assumes all units with fabric filters (about 34 sources) will have to purchase, install, and operate bag leak detection systems over the three year period of this ICR.

u Assumes 1 new respondent will submit one-time D/F testing for units without a numerical D/F standard.

v Assumes 20% of sources will request an extension of the comprehensive performance test and 10% of sources will request additional time for waiving OPLs for pretesting.

w It is assumed that 60% of units with PCDD/PCDF limits would be required to test over the three-year period of this ICR.

x It is estimated that 10% of all sources reporting annually will submit a request to use previous emissions test data to serve as documentation of compliance with emission standards.

y Assumes 60% of respondents must conduct a comprehensive performance test every 3 years and 60% of respondents must conduct a confirmatory performance every 5 years. It is estimated that 10% of these sources would reschedule the test.

z All facilities will submit a Notification of Compliance. It is estimated that 10% of facilities conducting the comprehensive performance test will apply for a waiver or time extension.

aa It is estimated that 10% of all facilities will apply for and receive approval to use alternative monitoring requirements to document compliance with the emission standards of Subpart EEE other than CO or HC which are monitored with a CEMS. It is estimated that no facilities will make a request to use alternative operating parameters or methods to CEMS or CEMS in lieu of operating parameters.

bb It is estimated that no existing sources will chose to use a CEMS for compliance monitoring and that 10% of sources will make a request to set feedrate limits with extrapolation.

cc It is estimated that EPA will request additional relevant information for the site-specific CMS performance test plan from 10% of the sources performing the test.

dd This requirement only applies to cement kilns without bag leak systems and PM detectors. It is estimated that all existing sources have these systems in place.

ee Assumes one respondent will prepare a draft NIC, notify the public about a NIC meeting, conduct the NIC meeting, prepare a final NIC with meeting comments, submit the NIC to EPA, and complete the progress report for one new HWC.

ff Assumes one respondent will submit initial notifications for a new HWC.

gg We estimate that 25% of all facilities will submit a request for an adjustment to a time period or postmark deadline.

hh It is estimated that 10% of facilities will submit a request to reduce frequency of excess emissions and continuous system performance reports from a quarterly (or more frequent basis).

ii It is estimated that 1% of all facilities reporting annually will submit a waiver of recordkeeping or reporting requirements.

jj It is anticipated that 25% of facilities will take actions during a startup, shutdown, or malfunction that are consistent with the procedures specified in the facility's startup, shutdown, or malfunction plan. These facilities are required to submit a periodic startup, shutdown, and malfunction report. Another 10% of facilities will take actions that are not consistent with procedures specified in their plans. These facilities acquired to submit an immediate startup, shutdown, and malfunction report.

kk It is anticipated that all facilities will submit an excess emissions and continuous monitoring system performance report and summary report.

ll It is estimated that 25% of facilities will submit a request for approval to use data compression techniques.

mm It is estimated that 10% of sources will submit a one-time request for a compliance extension due to the installation of controls, and that another 10% will submit a one-time request for a compliance extension for waste minimization purposes.

nn It is estimated that no source will submit requests to use an alternative CEMS span.

oo It is estimated that 25% of facilities will request to comply with the alternative risk based chlorine standards.

pp Assumes 5% of all respondents will document in the operating record compliance with alternative applicable Clean Air Act requirements and standards.

qq Assumes one respondent will document the hazardous waste residence time in the operating record for a new HWC.

rr It is estimated that all sources (units) will have 2 AWFCO per year. We assume 50% of units will conduct weekly AWFCO system inspections, while 50% will conduct monthly system testing;

ss Assumes 10% of existing respondents are updating an O&M plan and 1 new respondent is developing the plan.

tt It is estimated that no facilities will make a request to use alternative operating parameters or methods to CEMS.

uu It is estimated that 50% of all facilities will perform the comprehensive performance test under two or more operating modes. These facilities will be required to document what operating mode they are in during subsequent on-going day to day operations.

- wv It is estimated that it will take 40 hours each year for each of the HWC facilities to maintain copies of all required information (information must be retained for five years). All sources will need to maintain copies of all required information for continuous monitoring systems.
- ww It is anticipated that all facilities will develop a Documentation of Compliance to be included in their operating records
- yy Assumes 10% of respondents will update or develop the operator training and certification program each year. Assumes all respondents are conducting annual training.
- zz Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) (Renewal)

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent or Activity					Total Hours and Costs		
	Manager	Technical	Clerical	Total Person Hrs Per Respondent	Total Labor Cost Per Respondent	# Of Respondents ^a	Total Labor Hours	Total Costs ^b
Operation and Maintenance Plan ^c								
Review request to use alternative OPLs for ESP and ISWs	0.3	8.0	0.0	8.3	\$400.84	6.0	49.5	\$2,405.04
Notify applicants of EPA's determination	0.3	0.0	0.3	0.5	\$22.70	6.0	3.0	\$256.22
Analysis of feedstream ^d								
Request feedstream analysis plan	0.8	10.0	0.3	11.0	\$535.90	0.0	0.0	\$0
Extension of the compliance date to install pollution prevention waste minimization controls ^e								
Review requests for an extension of compliance date	1.0	4.0	0.3	5.3	\$263.62	12.0	63.0	\$3,175.49
Extension of compliance with emission standards ^f								
Review requests for extension of the compliance date	0.5	4.0	0.0	4.5	\$224.72	10.2	45.8	\$2,286.17
Review progress reports, if required by EPA	0.5	1.0	0.0	1.5	\$80.48	10.2	15.3	\$818.76
Notify applicants of EPA's determination	0.3	0.0	0.3	0.5	\$22.70	10.2	5.1	\$281.84
Changes in design, operation, or maintenance ^g								
Review notifications of changes in design, operation, or maintenance	3.0	15.0	0.0	18.0	\$915.60	30.0	540.0	\$27,468
Notify applicants of EPA's determination	0.3	0.0	0.3	0.5	\$22.70	30.0	15.0	\$711.12
Applicability of particulate matter and opacity standards during PM CEMS correlation tests ^h								
Review of PM CEMS correlation test plans	0.3	10.0	0.0	10.3	\$497.00	13.0	133.3	\$6,461.00
Notify applicants of EPA' determination	0.3	0.0	0.3	0.5	\$22.70	13.0	6.5	\$308.15
Alternative particulate matter standard for liquid fuel boilers with low feedrates of metals ⁱ								
Review petitions for alternative particulate matter standard for liquid boilers with low feedrates of metals	0.5	15.0	0.0	15.5	\$753.60	6.0	93.0	\$4,521.60
Notify applicants of EPA' determination	0.3	0.0	0.3	0.5	\$22.70	6.0	3.0	\$136.22
Startup, shutdown, and malfunction plan ^j								
Review startup, shutdown, and malfunction plans, notify applicant of results of review	0.5	5.0	0.0	5.5	\$272.80	7.0	38.5	\$1,916.60

Automatic waste feed cutoff ^k								
Review excessive exceedance reports	0.3	5.0	0.1	5.4	\$259.20	6.0	32.1	\$1,555.21
Notify applicants of EPA's determination	0.3	0.0	0.3	0.5	\$22.70	6.0	3.0	\$142.22
ESV openings ^l								
Review ESV openings report	0.3	5.0	0.1	5.4	\$259.20	38.5	206.0	\$9,979.26
Notify applicants of EPA's determination	0.3	0.0	0.3	0.5	\$22.70	38.5	19.3	\$912.60
Combustion system leaks ^m								
Review requests for approval of alternative means of combustion system leak control	0.5	2.0	0.0	2.5	\$128.56	30.0	75.0	\$3,856.80
Notify applicants of EPA' determination	0.3	0.0	0.3	0.5	\$22.70	30.0	15.0	\$711.12
Data in lieu of the initial comprehensive performance test ⁿ								
Review requests to base initial compliance data in lieu of a comprehensive performance test	2.0	20.0	0.0	22.0	\$1,091.20	6.0	132.0	\$6,547.20
Notify applicants of the EPA's determination	0.3	0.0	0.3	0.5	\$22.70	6.0	3.0	\$142.22
Notification of performance test and CMS performance evaluation and approval of test plan and CMS performance evaluation plan ^o								
Review notifications of intention to conduct a performance test	0.3	0.3	0.0	0.5	\$28.22	36.0	18.0	\$1,015.92
Review notifications of delay in conducting a performance test	0.3	0.3	0.0	0.5	\$28.22	3.6	1.8	\$101.59
Review site-specific comprehensive performance test plans	5.0	50.0	0.0	55.0	\$2,728.00	36.0	1980.0	\$98,208
Review site-specific confirmatory performance test plans	2.0	10.0	0.0	12.0	\$610.40	21.6	259.2	\$13,184.64
Notify applicants of the EPA's determination	0.3	0.0	0.3	0.5	\$22.70	36.0	18.0	\$1,537.34
Notification of compliance ^p								
Review notifications of compliance	3.0	40.0	0.0	43.0	\$2,117.60	60.0	2580.0	\$127,056
Review requests for a time extension for Notification of Compliance	0.3	4.0	0.0	4.3	\$208.52	6.0	25.5	\$1,251.12
Notify applicants of the EPA' s determination	0.3	0.0	0.3	0.5	\$22.70	6.0	3.0	\$136.22
Waiver of performance tests ^p								
Review requests to waive a performance test	1.0	4.0	0.0	5.0	\$257.12	6.0	30.0	\$1,542.72
Notify applicants of EPA' s determination	0.3	0.0	0.3	0.5	\$22.70	6.0	3.0	\$136.22
Time extension for subsequent performance tests ^p								
Review requests for an extension for conducting a performance test (other than the initial comprehensive performance test)	4.0	16.0	0.0	20.0	\$1,028.48	6.0	120.0	\$6,170.88
Notify applicants of the EPA's determination	0.3	0.0	0.3	0.5	\$22.70	6.0	3.0	\$142.22
Alternative compliance, monitoring requirements for standards other than those monitored with a CEMS ^q								

Review requests for approval of alternative monitoring methods, except for standards that must be monitored with a CEMS	0.5	10.0	0.0	10.5	\$513.20	6.0	63.0	\$3,079.20
Review requests for approval of a waiver of an operating parameter limit	1.0	10.0	0.0	11.0	\$545.60	0.0	0.0	\$0
Notify applicants of the EPA's determination for approval of alternative monitoring requirements	0.3	0.0	0.3	0.5	\$22.70	6.0	3.0	\$142.22
Notify applicants of the EPA's determination for approval of a waiver of an operating parameter limit	0.3	0.0	0.3	0.5	\$22.70	0.0	0.0	\$0
Dioxins and furans ^q								
Review requests for approval to substitute a different brand or type of carbon	0.5	2.0	0.0	2.5	\$128.56	0.0	0.0	\$0
Review requests for approval to substitute a different brand or type of inhibitor	0.5	2.0	0.0	2.5	\$128.56	0.0	0.0	\$0
Notify applicants of the EPA's determination for approval to substitute a different brand or of carbon	0.5	0.3	0.0	0.8	\$44.42	0.0	0.0	\$0
Notify applicants of the EPA's determination for approval to substitute a different brand or type of inhibitor	0.5	0.3	0.0	0.8	\$44.42	0.0	0.0	\$0
Mercury ^{q,r}								
Review requests for approval to use a CEMS in lieu of operating parameter limits	0.3	2.0	0.0	2.3	\$112.36	0.0	0.0	\$0
Review requests to extrapolate mercury feedrate limits	0.3	2.0	0.0	2.3	\$112.36	6.0	13.5	\$674.16
Notify applicants of the EPA's determination to extrapolate mercury feedrate limits	0.3	0.0	0.3	0.5	\$22.70	6.0	3.0	\$142.22
Notify applicants of the EPA's determination for approval to use a CEMS	0.3	0.0	0.3	0.5	\$22.70	0.0	0.0	\$0
Semivolatile and low semivolatile metals ^{q,r}								
Review requests for approval to use a CEMS in lieu of operating parameter limits	0.3	2.0	0.0	2.3	\$112.36	0.0	0.0	\$0
Review requests to extrapolate semivolatile metal and low volatile metal feedrate limits	0.3	2.0	0.0	2.3	\$112.36	6.0	13.5	\$674.16
Notify applicants of the EPA's determination to extrapolate SVM and LVM feedrates	0.3	0.0	0.3	0.5	\$22.70	6.0	3.0	\$142.22
Notify applicants of the EPA's determination for approval to use a CEMS	0.3	0.0	0.3	0.5	\$22.70	0.0	0.0	\$0
Total chlorine (hydrogen chloride and chlorine gas) ^q								
Review requests for approval to substitute a different brand or type of sorbent	0.3	2.0	0.0	2.3	\$112.36	6.0	13.5	\$674.16
Review requests for approval to use a CEMS in lieu of operating parameter limits	0.3	2.0	0.0	2.3	\$112.36	0.0	0.0	\$0
Notify applicants of the EPA's determination for approval to substitute a different brand or type	0.3	0.0	0.3	0.5	\$22.70	6.0	3.0	\$142.22

Notify applicants of the EPA's determination for approval to use a CEMS	0.3	0.0	0.3	0.5	\$22.70	0.0	0.0	\$0
Quality control program ^s								
Review CMS quality control program	0.3	10.0	0.0	10.3	\$497.00	6.0	61.5	\$2,982.00
Notify applicants of EPA's determination	0.3	0.0	0.3	0.5	\$22.70	6.0	3.0	\$388.22
Notification of performance evaluation ^t								
Review notifications of CMS performance evaluation	0.0	0.3	0.1	0.4	\$14.62	30.0	10.5	\$438.65
Additional notification requirements for sources with continuous monitoring systems ^t								
Review additional notification requirements for source with CMS	0.3	1.0	0.0	1.3	\$64.28	30.0	37.5	\$1,928.40
Submission of site-specific performance evaluation test plan ^u								
Review site-specific performance evaluation test plans	1.0	10.0	0.0	11.0	\$545.60	36.0	396.0	\$19,641.60
Notify applicants of the EPA's determination	0.3	0.0	0.3	0.5	\$22.70	36.0	18.0	\$1,537.34
Reporting results of continuous monitoring system performance evaluations ^u								
Review written reports of the results of the CMS performance evaluation	0.5	5.0	0.0	5.5	\$272.80	36.0	198.0	\$9,820.80
Notice of Intent to Comply ^v								
Review draft and final NIC	2.0	30.0	0.0	32.0	\$1,572.00	1.0	32.0	\$1,592.00
Attend public meeting	0.0	10.0	0.0	10.0	\$480.80	1.0	10.0	\$480.80
Initial notification ^w								
Review initial notifications	0.3	1.0	0.0	1.3	\$64.28	1.0	1.3	\$64.28
Review applications of approval of construction	0.3	10.0	0.0	10.3	\$497.00	1.0	10.3	\$497.00
Review applications of approval of reconstruction, as applicable	0.3	1.0	0.0	1.3	\$64.28	1.0	1.3	\$64.28
Notify applicants of the EPA's determination	0.3	0.0	0.3	0.5	\$22.70	1.0	0.5	\$23.70
Adjustment to time periods or postmark deadlines for submittal and review of equipped communications ^x								
Review requests for an adjustment to time periods or postmark deadlines for submittal and review of required information	0.5	1.0	0.0	1.5	\$80.48	15.0	22.5	\$1,207.20
Notify applicants of the EPA's determination	0.3	0.0	0.3	0.5	\$22.70	15.0	7.5	\$355.56
Request to reduce frequency of excess emissions an continuous monitoring system performance results ^y								
Review requests to reduce the frequency of excess emissions and CMS performance reports	0.5	1.0	0.0	1.5	\$80.48	6.0	9.0	\$482.88
Notify applicants of the EPA's determination	0.3	0.0	0.3	0.5	\$22.70	6.0	3.0	\$142.22
Waiver of record keeping and reporting requirements ^z								

Review waivers of recordkeeping or reporting	0.5	1.0	0.0	1.5	\$80.48	0.6	0.9	\$48.29
Notify applicants of the EPA's determination	0.3	0.0	0.3	0.5	\$22.70	0.6	0.3	\$14.22
Startup shutdown and malfunction reports ^{aa}								
Review startup, shutdown, and malfunction report, as applicable	0.3	5.0	0.0	5.3	\$256.60	15	78.8	\$3,849.00
Review immediate startup, shutdown, and malfunction report, as applicable	0.3	1.0	0.0	1.3	\$64.28	6	7.5	\$385.68
Excess emissions and continuous monitoring system performance report and summary report ^{bb}								
Review excess emissions and monitoring system performance reports and summary reports	0.3	5.0	0.0	5.3	\$256.60	60.0	315.0	\$15,396.00
Notify applicants of EPA's determination	0.3	0.0	0.3	0.5	\$22.70	60.0	30.0	\$1,422.24
Data compression ^{cc}								
Review requests for approval to use data compression techniques to record data on a less frequent basis	0.5	1.0	0.0	1.5	\$80.48	15.0	22.5	\$1,207.20
Notify applicants of the EPA's determination	0.3	0.0	0.3	0.5	\$22.70	15.0	7.5	\$355.56
Performance Evaluation ^{dd}								
Review data collected from CEMS performance evaluation	0.5	5.0	0.0	5.5	\$272.80	0.0	0.0	\$0
Notify applicants of EPA's determination	0.3	0.0	0.3	0.5	\$22.70	0.0	0.0	\$0
Use of alternative CEMS spans ^{ee}								
Review requests for approval to use alternative CEMS spans and ranges	1.0	4.0	0.0	5.0	\$257.12	0.0	0.0	\$0
Notify applicants of the EPA's determination	0.3	0.0	0.3	0.5	\$22.70	0.0	0.0	\$0
Alternative Risk Based Chlorine Standards ^{ff}								
Review request for use of alternative risk based chlorine standards	3.0	20.0	2.0	25.0	\$1,208.03	15.0	375.0	\$18,135.48
Compliance with alternative MACT standards ^{gg}								
Review operating record documenting compliance with all applicable CAA requirements and standards when not burning hazardous waste	0.5	2.0	0.0	2.5	\$128.56	3.0	7.5	\$385.68
Notify applicants of EPA's determination	0.3	0.0	0.3	0.5	\$22.70	3.0	1.5	\$71.11
Hazardous waste residence time ^{hh}								
Review determination of hazardous waste residence time	0.3	2.0	0.0	2.3	\$112.36	1.0	2.3	\$112.36
Notify applicants of EPA's determination	0.3	0.0	0.3	0.5	\$22.70	1.0	0.5	\$23.70
Operator training and certification ⁱⁱ								
Review operator training and certification programs	0.3	15.0	0.0	15.3	\$737.40	6.0	91.5	\$4,424.40
Notify applicants of EPA's determination	0.3	0.0	0.3	0.5	\$22.70	6.0	3.0	\$256.22
Additional mailing materials and postage costs (non-								\$2,290

labor)		
TOTAL ANNUAL BURDEN AND COST (ROUNDED)ⁱⁱ		8,420 \$421,000

- a The total number of respondents estimated over the next three years is based on approximately 177 existing units at 153 facilities that are subject to the standard, with one new unit per year over the same period. The overall average number of respondents submitting reports in each year is calculated as one-third of the total respondents and is 60 respondents per year.
- b Labor cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$64.80 for Managerial (GS-13, Step 5, \$40.50 x 1.6), \$48.08 for Technical (GS-12, Step 1, \$30.05 x 1.6) and \$26.02 Clerical (GS-6, Step 3, \$16.26 x 1.6). These rates are from the Office of Personnel Management (OPM), 2017 General Schedule, which excludes locality rates of pay.
- c It is estimated that of the sources reporting annually with ESPs or IWSs, 90% will request to use operating parameter limits instead of continuous particulate detectors.
- d Assumes all HWCs have already developed and implemented feedstream analysis plans under current RCRA requirements (referred to as the waste analysis plan). There is no incremental burden for this requirement.
- e It is estimated that 10% of sources will submit a one-time request for a compliance extension due to the installation of controls, and that another 10% will submit a one-time request for a compliance extension for waste minimization purposes.
- f Assumes 20% of all facilities operating an HWC will apply for an extension each year.
- g It is estimated that 50% of the sources reporting annually will be making design, operation, and maintenance changes to comply with the MACT rule.
- h It is anticipated that 39 sources (among all HWC) will conduct PM CEMS correlation testing over the 3-year period of this ICR and request a waiver of PM and opacity standards during the testing.
- i Assumes 10% of respondents will submit a petition for an alternative particulate matter standard for liquid fuel boilers with low feedrates.
- j Assumes 1 new respondent and 10% of existing respondents reporting annually will develop or revise the SSM plan and resubmit the plan for approval.
- k Assumes 10% of respondents will submit AWFCO excessive exceedance reports.
- l It is estimated that 50% of hazardous waste incinerators reporting annually have ESVs, and will develop an ESV operating plan. On average, each unit will have 3 ESV openings per year.
- m It is estimated that respondents will request approval for 50% of all sources for use of an alternative means to provide control of combustion system leaks (control through a positively sealed combustion chamber).
- n It is estimated that 10% of all sources reporting annually will submit a request to use previous emissions test data to serve as documentation of compliance with emission standards.
- o Assumes 60% of respondents must conduct a comprehensive performance test every 3 years and 60% of respondents must conduct a confirmatory performance every 5 years.
- p All facilities will submit a Notification of Compliance. It is estimated that 10% of facilities conducting the comprehensive performance test will apply for a waiver or time extension.
- q It is estimated that 10% of all facilities will apply for and receive approval to use alternative monitoring requirements to document compliance with the emission standards of Subpart EEE other than CO or HC which are monitored with a CEMS. It is estimated that no facilities will make a request to use alternative operating parameters or methods to CEMS or CEMS in lieu of operating parameters.
- r It is estimated that no existing sources will chose to use a CEMS for compliance monitoring and that 10% of sources will make a request to set feedrate limits with extrapolation.
- s It is estimated that EPA will request additional relevant information for the site-specific CMS performance test plan from 10% of the sources performing the test.
- t As part of the comprehensive performance test, HWCs will submit a CMS quality control program, notification of performance evaluation and additional notification requirements; we estimate that 50% of sources have submitted a CMS quality control program at this time.
- u HWCs are also required to submit performance evaluation test plan, and conduct a CMS performance test. We estimate 60% of sources would submit test plans and conduct performance testing along with their comprehensive performance testing.
- v Assumes one respondent will prepare a draft NIC, notify the public about a NIC meeting, conduct the NIC meeting, prepare a final NIC with meeting comments, submit the NIC to EPA, and complete the progress report for one new HWC.
- w Assumes one respondent will submit initial notifications for a new HWC.
- x We estimate that 25% of all facilities will submit a request for an adjustment to a time period or postmark deadline.
- y It is estimated that 10% of facilities will submit a request to reduce frequency of excess emissions and continuous system performance reports from a quarterly (or more frequent basis).

- z It is estimated that 1% of all facilities reporting annually will submit a waiver of recordkeeping or reporting requirements.
- aa It is anticipated that 25% of facilities will take actions during a startup, shutdown, or malfunction that are consistent with the procedures specified in the facility's startup, shutdown, or malfunction plan. These facilities are required to submit a periodic startup, shutdown, and malfunction report. Another 10% of facilities will take actions that are not consistent with procedures specified in their plans. These facilities acquired to submit an immediate startup, shutdown, and malfunction report.
- bb It is anticipated that all facilities will submit an excess emissions and continuous monitoring system performance report and summary report.
- cc It is estimated that 25% of facilities will submit a request for approval to use data compression techniques.
- dd Burden for performance evaluations is included in the notification of performance test and CMS performance evaluations.
- ee It is estimated that no source will submit requests to use an alternative CEMS span.
- ff It is estimated that 25% of facilities will request to comply with the alternative risk based chlorine standards.
- gg Assumes 5% of all respondents will document in the operating record compliance with alternative applicable Clean Air Act requirements and standards.
- hh Assumes one respondent will document the hazardous waste residence time in the operating record for a new HWC.
- ii Assumes 10% of respondents will update or develop the operator training and certification program each year.
- jj Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.