Table 1: Annual Respondent Burden and Cost - NSPS for Other Solid Waste Incineration Units (40 Cl

		·	ı
Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarize with rule requirements ^c	40	1	40
B. Required activities			
1) Initial performance test and reports			
a) Initial performance tests (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg) ^c	24	1	24
b) Repeat of initial performance tests ^{c,d}	24	1	24
2) CEMS demonstration (CO, O2)			
a) Initial demonstration	229	1	229
3) Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg) ^f	24	1	24
4) Daily calibration and operation ^e	1	250	250
5) Waste management plan ^c	20	1	20
C. Create information	See 3B		
D. Gather existing information	See 3E		
E. Write Report			
1) Preconstruction report ^c	8	1	8
2) Startup notification ^c	2	1	2
3) Initial test report ^c	40	1	40
4) Annual compliance reports ^f	40	1	40
5) Semiannual deviation reports ⁱ	24	2	48
Subtotal for Reporting Requirements			
4. Recordkeeping requirements			
A. Familiarize with rule requirementsc	See 3A		
B. Plan activities	See 3B		
C. Implement activities	See 3B		
D. Develop record system	N/A		
E. Record information			
1) Records of SSM ^g	1.5	52	78
2) Records of emission rate computations, all emission exceedances and periods when there is no data ^{g, i}	1.5	52	78
Records of employee review of operations manual	4	1	4

4) Record of control devices operating parameters ^g	1.5	52	78		
F. Perform Audits	N/A				
Subtotal for Recordkeeping Requirements					
TOTAL LABOR BURDEN AND COST (rounded) ^h					
TOTAL Capital and O&M Cost (rounded) ^h					
GRAND TOTAL (Labor Cost + Capital/O&M)h					

Assumptions:

- ^a On average, EPA expects 55 new units to be constructed or in operation per year over the next three years. Th American Samoa. Puerto Rico. Virgin Islands. and Northern Mariana Islands.
- ^b This ICR uses the following labor rates: \$117.92 (technical), \$147.40 (managerial), and \$57.02 (clerical). Th June 2018, "Table 2. Civilian workers, by occupational and industry group." The rates are from column 1, "To packages available to those employed by private industry.
- ^c We have assumed that this is a one-time only cost for new respondents. Note that the waste management plan
- $^{
 m d}$ We have assumed that only 20% of respondents would be required to repeat a performance test.
- ^e We have assumed that each respondent will take 1 hour 250 times per year to record daily calibration and ope
- $^{\rm f}$ Average number of existing respondents for the three-year period expect to submit an annual report ((0 + 55 months following the initial test report. Therefore, no new respondents are anticipated to submit an annual com
- ^g We have assumed that each respondent will record information 52 times per year.
- ^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
- ⁱWe have assumed that 10 percent of the average number of respondents (110 x 0.10) will report exceedances.

117.92

147.4

57.02

	Person-hours per year			
(D) Respondents per year ^a	(E) Technical	(F) Management person hours per year (Ex0.05)	(G)	(H) Total Cost per year ^b
55	2200	110	220	\$288,182.40
55	1320	66	132	\$172,909.44
11	264	13.2	26.4	\$34,581.89
55	12595	629.75	1259.5	\$1,649,844.24
55	1320	66	132	\$172,909.44
110	27500	1375	2750	\$3,602,280.00
55	1100	55	110	\$144,091.20
55	440	22	44	\$57,636.48
55	110	5.5	11	\$14,409.12
55	2200	110	220	\$288,182.40
55	2200	110	220	\$288,182.40
11	528	26.4	52.8	\$69,163.78
		59,544		\$6,782,373
110	8580	429	858	\$1,123,911.36
11	858	42.9	85.8	\$112,391.14
110	440	22	44	\$57,636.48

110	8580	429	858	\$1,123,911.36
	21,227			\$2,417,850
	80,800		\$9,200,000	
				\$2,720,000
				\$11,900,000

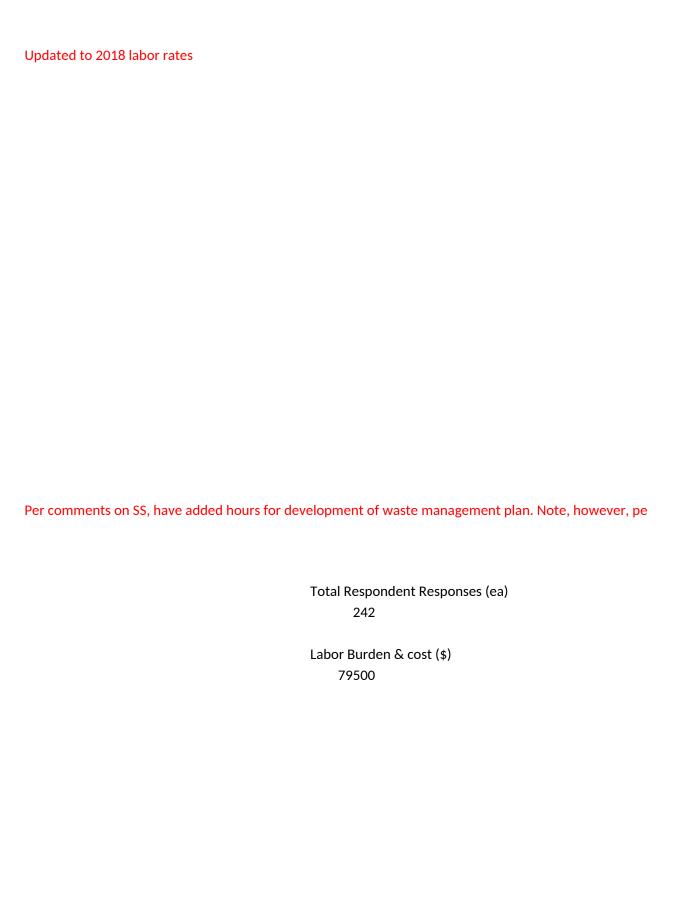
is assumption is based on one new unit per state or U.S. protectorate per year, including

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

ι is submitted as part of the preconstruction report.

eration.

+ 110)/3 = 55). Annual testing and compliance reports are required to be submitted 12 pliance report in the first year of reporting.



242 respones 334 hrs/response

See response to comments in supporting statement, but we have pulled Total Annual Response table into file to c origin of respor Owens, Katharine:

Why is Labor Burden & Cost used in this calculation? How do we arrive at hours when we're diving dollars by # of reports?



note that larify

Table 2: Average Annual EPA Burden and Cost - NSPS for Other Solid Waste Incineration Units (40 CFR Part 60, 5

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year ^a
1. Applications	N/A			
2. Familiarization with the regulatory requirements	16	1	16	55
3. Required activities				
A. Create information	N/A			
B. Gather information	See 3A & 3F			
C. Report reviews				
1) Notification of final compliance ^c	1.5	1	1.5	55
2) Review initial compliance test report ^c	40	1	40	55
3) Review annual compliance report ^d	40	1	40	55
4) Review semiannual deviation reports ^e	16	2	32	11
5) Review waste management plan ^c	16	1	16	55
D. Annual summary report ^f	4	1	4	55
TOTAL ANNUAL BURDEN AND COST (rounded) ^g	•	•		•

Assumptions:

^a On average, EPA expects 55 new units to be constructed or in operation per year over the next three years. This assumption including American Samoa, Puerto Rico, Virgin Islands, and Northern Mariana Islands.

^b This ICR uses the following labor rates: \$48.75 (technical), \$65.71 (managerial), and \$26.38 (clerical). These rates are fror Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit package.

^c We have assumed that this is a one-time only cost.

^d Average number of existing respondents for the three-year period expect to submit an annual report. Annual testing and cor the initial test report. Therefore, no new respondents are anticipated to submit an annual compliance report in the first year of

^eWe have assumed that 10 percent of the average number of respondents (110 x 0.10) will report exceedances.

^f We have assumed that all affected facilities will be required to prepare an annual summary plan.

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

Subpart EEEE)(Renewal).

48.75	65.71	26.38	
(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, \$ ^b
			410.115.00
880	44	88	\$48,112.68
			4
82.5	4.125	8.25	\$4,510.56
2200	110	220	\$120,281.70
2200	110	220	\$120,281.70
352	17.6	35.2	\$19,245.07
880	44	88	\$48,112.68
220	11	22	\$12,028.17
	7,840		\$373,000

 ι is based on one new unit per state or U.S. protectorate per year,

n the Office of Personnel Management (OPM), 2018 General ges available to government employees.

npliance reports are required to be submitted 12 months following f reporting.

Capital/Startup vs. Operation and Maintenance (O&M)						
	(B) Capital/Startup Cost for One Respondent			(E) Annual O&M Costs for One Respondent		
Continuous emission monitoring system	\$44,445	55	\$2,444,000	\$5,000		

osts	
(F)	(G)
Number of Respondents with O&M	Total O&M,
	(E X F)
55	\$275,000

Total Annual Responses							
(A)	(B)	(C)	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses			
Information Collection Activity	Number of Respondents	Number of Responses	Not Subilit Reports	E=(BxC)+D			
Notification to commence construction	55	1	0	55			
Notification of initial startup	55	1	0	55			
Initial test report	55	1	0	55			
Annual compliance reports	55	1	0	55			
Semiannual deviation reports ^a	11	2	0	22			
			Total	242			