

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU) (Renewal), EPA ICR Number 2137.08, OMB Control Number 2060-0567.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU) were proposed on May 3, 2011, and promulgated on February 16, 2012. The rule was subsequently amended on: March 24, 2015 (80 FR 15510); April 6, 2016 (81 FR 20172); and April 6, 2017 (82 FR 16736).¹ These regulations apply to each individual or group of two or more new, reconstructed, or existing electric utility steam generating units (EGUs) within a contiguous area and under common control. An EGU is defined as a fossil fuel-fired combustion unit of more than 25 megawatts electric (MWe) that serves a generator that produces electricity for sale, or a fossil fuel-fired unit that cogenerates steam and electricity and supplies more than one-third of its potential electric output capacity and more than 25 MWe output to any utility power distribution system for sale. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart UUUUU.

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 the provisions of this part shall maintain a file containing these documents and retain the file for at least five years following the generation date of such maintenance 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. Environmental

¹ The amendments promulgated on March 24, 2015 (80 FR 15510), April 6, 2016 (81 FR 20172), and April 6, 2017 (82 FR 16736) included amendments to revise electronic reporting requirements by temporarily requiring affected sources to submit certain compliance reports using a PDF format through the Emissions Collection and Monitoring Plan System (ECMPS) Client Tool, in lieu of the Compliance and Emissions Data Reporting Interface (CEDRI), as well as technical corrections and clarifications to address conflicts or errors in the final rule. These amendments did not impose any new information collection burden because they did not change the information collection requirements.

Protection Agency (EPA) regional office.

The “Affected Public” are owners and operators of coal- and oil-fired electric utility steam generating units. The ‘burden’ to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU) (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 Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU) (Renewal).

There are approximately 727 coal- or oil-fired EGUs, which are owned and operated at 322 electric utilities. This estimate is based on adjustments for the shutdown and conversion of existing solid-fired (specifically coal-fired) units to gas-fired units since promulgation of the final rule. Based on the 2011 final rule, approximately 16.8% of facilities (54 facilities) are owned by either state, local, or tribal governments.² The remaining 83.2% (268) facilities are all assumed to be owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to all EPA inquiries.

Based on our consultations with industry representatives, there are an average of 2.25 affected facilities at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site). Over the next three years, approximately 322 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. This estimate is based on industry trends that suggest that no new fossil fuel-fired steam generating units will be constructed in the near future due to low electricity demand growth, competitive natural gas prices, and increases in the supply of renewable energy.

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. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

² The 2011 rule identified 575 facilities, of which 96 facilities (or approximately 16.6% of all sources) were owned by “state, municipal, and political subdivisions”. See *Regulatory Impact Analysis for the Final Mercury and Air Toxics Standards*, EPA-452/R-11-011, December 2011.

(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, hydrochloric acid (HCl), filterable particulate matter (PM), Hg, and organic hazardous air pollutants (HAPs) emissions from coal-fired EGUs and HCl, filterable PM, HF, and organic HAPs from oil-fired EGUs 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 source category at 40 CFR Part 63, Subpart UUUUU.

2(b) Practical Utility/Users of the Data

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

Performance tests are required to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with these same 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 the 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 the standards are being met. The performance test may also be observed.

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

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

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

UUUUU.

3(a) Non-duplication

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

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

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (82 FR 29552) on June 29, 2017. No comments were received on the burden published in the *Federal Register* for this renewal.

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. Approximately 322 respondents will be subject to these same standards over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were 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 Electric Power Research Institute, at 650-855-2121, and the Edison Electric Institute, at 202-508-5000.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as to those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

3(d) Effects of Less-Frequent Collection

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and that 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 the 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/SIC Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of fossil fuel-fired EGUs. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 4911 (Electric Services) which corresponds to the North American Industry Classification System (NAICS) 221100 (Electric Power Generation, Transmission, and Distribution).

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for

Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU).

A source must make the following reports:

Notifications	
Initial notification	§ 63.5(b)(4) § 63.5(d)(1) § 63.9(b) §§ 63.10030(a-c)
Notification of performance test/evaluation	§ 63.7(b), § 63.7(c)(2), § 63.8(e)(2), § 63.9(g)(1), §§ 63.10030(a and d)
Notification of compliance status	§ 63.7(g), § 63.9(h), § 63.10030(a), § 63.10030(e), § 63.10005(k), § 63.10011(e)
Notification of the date the source intends to commence or recommence operations in a manner that meet the definition of an EGU	§ 63.10030(f), § 63.10000(h)(2)
Notification of the date the source ceases to operate in a manner that meets the definition of an EGU	§ 63.10030(f) § 63.10000(i)(2)
Request to use alternative monitoring procedure	§ 63.8(f)

Reports	
Excess emissions	§ 63.10(e)(3), § 63.10021(g), §§ 63.10031(a and d)
Performance test/evaluation results	§ 63.8(e)(5), § 63.10(d)(2), § 63.10(e)(2), § 63.10031(f)
Startup/shutdowns periods and activities	§ 63.10011(g), § 63.10021(i)
Semi-annual compliance report	§§ 63.10031(a and c)

Reports	
Site-specific test plan	§ 63.7(c), § 63.10000(c)(2), § 63.10000(d)(1), § 63.10007(a)
Dates of tune-ups	§ 63.10021(e)

A source must keep the following records:

Recordkeeping	
Notifications and reports	§ 63.10032(a)(1)
Continuous monitoring system (CMS) tests, measurements, malfunctions, maintenance, exceedances	§ 63.7(g)(3), §§ 63.10(b)(2)(iii and vi-ix), § 63.10(c), § 63.10007(g), § 63.10032(a)(2), §§ 63.10032(b and c)
Monthly fuel use	§ 63.10032(d)(1)
Documentation showing that criteria are satisfied for non-hazardous secondary materials	§ 63.10032(d)(2)
Documentation showing continued qualification as a low emitting EGU (LEE)	§ 63.10032(d)(3)
Emissions averaging implementation plan (only for sources electing to average emissions)	§ 63.10032(e)
Startups and shutdowns	§ 63.10021(h), §§ 63.10032(f and i)
Malfunction periods and corrective actions taken to restore normal operation	§§ 63.10032(g and h)
Quarterly fuel use (only for sources qualifying as limited-use liquid oil-fired EGUs)	§ 63.10032(j)
Tune-up records (only for sources that conducted tune-ups prior to April 16, 2012)	§ 63.10005(f)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. Most emissions and monitoring information in the reports are reported in an electronic format using the Electronic Reporting Tool (ERT). The data will be extracted from the ERT files and can be viewed through EPA's Central Data Exchange. At this time, it is estimated that approximately 100 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for filterable PM, HCl, HF, Hg, or organic HAPs.
Perform initial performance test, Reference Methods 5, 6A, 19, 26, 26A, 29, 30B, or 320tests, 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 the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis,

storage, and distribution of the required information.

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

5(c) Small Entity Flexibility

The 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. During rulemaking, EPA conducted outreach to small entities and convened a Small Business Advocacy Review (SBAR) Panel to obtain advice and recommendations from representatives of small entities that would be subject to the rule. Agency discussions with the SBAR Panel included potential rulemaking approaches and alternatives that would decrease the rule's impact on small businesses. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. 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

The specific frequency for each information collection activity within this request is shown below in Tables 1a through 1c: Annual Respondent Burden and Cost – NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR 63, Subpart UUUUU) (Renewal).

6. Estimating the Burden and Cost of the Collection

Tables 1a and 1b document 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 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.

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 284,000 hours (Total Labor Hours from Tables 1a and 1b below; see also the summary of burden in Table 1c). 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

For private facilities, 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.

For Federal facilities, this ICR uses the following labor rates:

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.

(ii) Estimating Capital/Startup and Operation 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. These include the costs to conduct the initial performance tests for each EGU and startup costs for each CMS. The capital/startup costs are one-time costs when a facility becomes subject to the regulations. 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 (O&M) Costs

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Pollutant	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M ^a	(G) Total O&M, (E X F)
<i>Performance Testing</i>						
PM - Method 5 ^b	\$15,522	0	\$0	\$15,522	489	\$7,590,000
HCl - Method 320 ^b	\$20,444	0	\$0	\$20,444	120	\$2,460,000 ⁴

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
Hg - Method 30B ^b	\$20,006	0	\$0	\$20,006	172	\$3,450,000
<i>CEMS Installation & Operation</i>						
PM ^b	\$65,388	0	\$0	\$41,499	198	\$9,880,000
HCl ^b	\$111,045	0	\$0	\$41,618	505	\$25,200,000
Hg ^b	\$174,002	0	\$0	\$100,006	462	\$55,500,000
Total^c			\$0			\$104,000,000

^a Based on the number of units. EPA estimates an average of 727 units at 322 existing facilities.

^b Across all existing facilities, EPA estimates there will be annual testing conducted for a total of 489, 120, and 172 units for PM, HCl, and Hg, respectively. It is estimate that there are 198, 505, and 462 CEMS monitoring for PM, HCl, and Hg, respectively. The costs related to PM, HCl, and Hg were estimated using the CEMS Cost Model, which is available at www.epa.gov/ttn/emc/cem/cems.xls.

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

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

The total operation and maintenance (O&M) costs for this ICR are \$104,000,000. 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 \$104,000,000. 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 activities such 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 \$268,000.

This cost is based on the average hourly labor rates 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 Federal government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR 63, Subpart UUUUU) (Renewal).

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next three years, approximately 727 units at 322 existing facilities will be subject to these standards. It is estimated that no additional respondents will become subject to these same standards in the next three years. The overall average number of respondents, as shown in the table below, is 322 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents ²	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	322	0	0	322
2	0	322	0	0	322
3	0	322	0	0	322
Average	0	322	0	0	322

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

² Includes both public and private facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 322.

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

Total Annual Responses				
(A)	(B)	(C)	(D) Number of Existing	(E) Total Annual Responses

Total Annual Responses				
Information Collection Activity	Number of Respondents	Number of Responses	Respondents That Keep Records But Do Not Submit Reports	E=(BxC)+D
Existing Sources				
Notification of CEMS demonstration ¹	0	1	0	0
Notification of initial performance test ¹	0	1	0	0
Performance test report ²	489	1	0	489
Notification of compliance status ¹	0	1	0	0
Quality assurance program certification	0	1	0	0
Startup, shutdown, and malfunction report (10% of respondents)	32.2	1	0	32.2
Semiannual compliance report	322	2	0	644
Site-specific performance evaluation test plan ¹	264	1	0	264
Request to use alternative monitoring procedure (10% of respondents) ¹	26.4	1	0	26.4
New Sources				
Initial notification	0	1	0	0
Notification of CEMS demonstration ¹	0	1	0	0
Notification of initial performance test ¹	0	1	0	0
Performance test report ¹	0	1	0	0
Notification of compliance status ¹	0	1	0	0
Quality assurance program certification ¹	0	1	0	0
Startup, shutdown, and malfunction report (10% of respondents)	0	1	0	0
Semiannual compliance report	0	2	0	0

Total Annual Responses				
Site-specific performance evaluation test plan ¹	0	1	0	0
Request to use alternative monitoring procedure (10% of respondents) ¹	0	1	0	0
				1,456

¹ Reflects one-time only activities required for compliance with the rule.

The number of Total Annual Responses is 1,456.

The total annual labor costs are \$28,000,000. Details regarding these estimates may be found below in Tables 1a and 1b, and the summary information may be found below in Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector - NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown below in Tables 1a, 1b, respectively, and summarized in Table 1c. Table 2 presents the details of both the burden hours and cost calculations for the Federal government.

(i) Respondent Tally

The total annual labor hours are 284,000 hours. Details regarding these estimates may be found below in both Tables 1a and 1b: Annual Respondent Burden and Cost – NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR 63, Subpart UUUUU) (Renewal).

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

Furthermore, the annual respondent reporting and recordkeeping burden for this collection of information is estimated to average 195 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$104,000,000. 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 5,700 labor hours at a cost of \$268,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR 63, Subpart UUUUU) (Renewal).

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

6(f) Reasons for Change in Burden

There is an adjustment decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This change is not due to any program changes. The change in the burden and cost estimates occurred due to more accurate estimates of existing and anticipated new sources. The previous ICR reflected those burdens and costs associated with the initial activities for subject new facilities. This includes purchasing monitoring equipment, conducting performance test(s) and establishing recordkeeping systems. This ICR, by in large, reflects the on-going burden and costs for existing sources; there are no new sources anticipated for the period of this ICR. Activities for existing sources include the continuous monitoring of pollutants and the submission of semiannual reports. Revisions to account for these changes in activity also reduce the estimated number of responses. The overall result is a decrease in burden hours and labor costs.

However, there is an adjustment increase in the capital/start-up and O&M costs from the previous ICR. The prior ICR included capital/startup costs and O&M costs for new sources, but inadvertently removed O&M costs for existing sources. This ICR removes the capital/start-up costs for new sources, which reflects that activities that have been completed by respondents and no new respondents are anticipated for the period of this ICR. However, this ICR reincorporates O&M costs for existing respondents, which has an overall result of an increase in O&M costs and an overall increase in total (labor and O&M) costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 195 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 valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2014-0093. 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-2014-0093 and OMB Control Number 2060-0567 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
Initial performance test (PM, Methods 5 and 202)	27.8	1	27.8	0	0	0	0	\$0
Initial performance test (HCl, Method 320)	26.4	1	26.4	0	0	0	0	\$0
Initial performance test (Hg, Method 30B)	27.8	1	27.8	0	0	0	0	\$0
CEMS quarterly inspections	2.46	4	9.84	0	0	0	0	\$0
CEMS daily calibration drift tests	0.12	365	43.8	0	0	0	0	\$0
CEMS daily monitoring	0	365	0	0	0	0	0	\$0
All CEMS must follow appropriate performance specifications	7.3	365	2664.5	0	0	0	0	\$0
C. Create information	See 4B							
D. Gather existing information	See 4E							
E. Write Report								
Existing sources								
Notification of CEMS demonstration	5	1	5	0	0	0	0	\$0
Notification of initial performance test	3	1	3	0	0	0	0	\$0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	\$0
Quality assurance program certification	4	1	4	0	0	0	0	\$0
Startup, shutdown, and malfunction report	10	1	10	26.8	268	13.4	26.8	\$553,697.99

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
(10% of respondents)								
Semiannual compliance report	75	2	150	268	40,200	2,010	4,020	\$13,842.45
Site-specific performance evaluation test plan	20	1	20	220	4,397	220	440	\$553,697.99
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	22	110	5	11	\$13,842.45
New sources								
Initial notification	3	1	3	3	0	0	0	\$0
Notification of CEMS demonstration	5	1	5	5	0	0	0	\$0
Notification of initial performance test	4	1	4	4	0	0	0	\$0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	16.5	0	0	0	\$0
Quality assurance program certification	3	1	3	3	0	0	0	\$0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	10	0	0	0	\$0
Semiannual compliance report	75	2	150	150	0	0	0	\$0
Site-specific performance evaluation test plan	20	1	20	20	0	0	0	\$0
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	5	0	0	0	\$0

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
Subtotal for Reporting Requirements						224,328		\$24,564,630
5. Recordkeeping requirements								
A. Familiarization with Regulatory Requirements	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Record data	N/A							
E. Time to transmit or disclose information								
Existing sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	26.8	322	16.1	32.2	\$40,498.64
Records of startups, shutdowns, malfunctions, etc.	1	12	12	268	3,216	160.8	321.6	\$404,986.38
Records of monthly fuel use	2	12	24	268	6,432	321.6	643.2	\$809,972.76
New sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	0	0	0	0	\$0
Records of startups, shutdowns, malfunctions, etc.	1	12	12	0	0	0	0	\$0
Records of monthly fuel use	2	12	24	0	0	0	0	\$0
F. Time to train personnel	80	1	80	0	0	0	0	\$0

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						11,465		\$1,255,458
TOTAL LABOR BURDEN AND COST (ROUNDED)^c						236,000		\$25,800,000
TOTAL CAPITAL AND O&M COST (ROUNDED)^c								\$86,600,000
GRAND TOTAL (ROUNDED)^c								\$112,000,000

Footnotes:

^a EPA estimates an average of 727 units at 322 existing facilities and no new facilities per year will be subject to the NESHAP over the next 3 years. Of these, 268 facilities are owned by private industry.

^b This ICR uses the following labor rates: \$112.98 (technical), \$149.35 (managerial), and \$54.81 (clerical). 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." They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c Estimates are based on the number of privately-owned EGUs complying with annual testing requirements for PM, HCl, and Hg, in lieu of CEMS/CPMS monitoring for these pollutants and includes 407 EGUs conducting Method 5 and Method 202 testing, 100 EGUs conducting Method 320 testing, and 143 EGUs conducting Method 30B testing.

^d Assumes that 505 privately-owned EGUs use HCl or SO₂ CEMs.

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

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
Initial performance test (PM, Methods 5 and 202)	27.8	1	27.8	0	0	0	0	\$0
Initial performance test (HCl, Method 320)	26.4	1	26.4	0	0	0	0	\$0
Initial performance test (Hg, Method 30B)	27.8	1	27.8	0	0	0	0	\$0
CEMS quarterly inspections	2.46	4	9.84	0	0	0	0	\$0
CEMS daily calibration drift tests	0.12	365	43.8	0	0	0	0	\$0
CEMS daily monitoring	0	365	0	0	0	0	0	\$0
All CEMS must follow appropriate performance specifications	7.3	365	2664.5	0	0	0	0	\$0
C. Create information	See 4B							
D. Gather existing information	See 4E							
E. Write Report								
Existing sources								
Notification of CEMS demonstration	5	1	5	0	0	0	0	\$0
Notification of initial performance test	3	1	3	0	0	0	0	\$0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	\$0
Quality assurance program certification	4	1	4	0	0	0	0	\$0
Startup, shutdown, and malfunction report	10	1	10	5.4	54	2.7	5.4	\$2,911.77

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
(10% of respondents)								
Semiannual compliance report	75	2	150	54	8,100	405	810	\$436,764.96
Site-specific performance evaluation test plan	20	1	20	44	886	44	89	\$47,771.66
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	4	22	1	2	\$1,194.29
New sources								
Initial notification	3	1	3	0	0	0	0	\$0
Notification of CEMS demonstration	5	1	5	0	0	0	0	\$0
Notification of initial performance test	4	1	4	0	0	0	0	\$0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	\$0
Quality assurance program certification	3	1	3	0	0	0	0	\$0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	0	0	0	0	\$0
Semiannual compliance report	75	2	150	0	0	0	0	\$0
Site-specific performance evaluation test plan	20	1	20	0	0	0	0	\$0
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	0	0	0	0	\$0

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
Subtotal for Reporting Requirements					45,200			\$2,696,255
5. Recordkeeping requirements								
A. Familiarization with Regulatory Requirements	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Record data	N/A							
E. Time to transmit or disclose information								
Existing sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	5.4	65	3.2	6.5	\$3,494.12
Records of startups, shutdowns, malfunctions, etc.	1	12	12	54	648	32.4	64.8	\$34,941.20
Records of monthly fuel use	2	12	24	54	1,296	64.8	129.6	\$69,882.39
New sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	0	0	0	0	\$0
Records of startups, shutdowns, malfunctions, etc.	1	12	12	0	0	0	0	\$0
Records of monthly fuel use	2	12	24	0	0	0	0	\$0
F. Time to train personnel	80	1	80	0	0	0	0	\$0

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						2,310		\$108,318
TOTAL LABOR BURDEN AND COST (ROUNDED)^c						48,000		\$2,200,000
TOTAL CAPITAL AND O&M COST (ROUNDED)^c								\$17,500,000
GRAND TOTAL (ROUNDED)^c						48,000		\$19,700,000

Footnotes:

^a EPA estimates an average of 727 units at 322 existing facilities and no new units per year will be subject to the NESHAP over the next 3 years. Of these, 54 facilities are owned publicly.

^b This ICR uses the following labor rates for public facilities: \$64.80 (technical), \$48.08 (managerial), and \$26.02 (clerical). 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

^c Estimates are based on the number of publicly-owned EGUs complying with annual testing requirements for PM, HCl, and Hg, in lieu of CEMS/CPMS monitoring for these pollutants and includes 82 EGUs conducting Method 5 and Method 202 testing, 20 EGUs conducting Method 320 testing, and 29 EGUs conducting Method 30B testing.

^d Assumes that 102 publicly-owned EGUs use HCl or SO₂ CEMs.

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

Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU) (Renewal)

Affected Sector	Number of Responses	Labor Hours			Labor Cost	Capital and O&M Cost	Total Cost
		Reporting	Recordkeeping	Total			
Private	1212	224,328	11,465	236,000	\$25,800,000	\$86,600,000	\$112,000,000
Public (State/Local/Tribal)	244	45,200	2,310	47,500	\$2,200,000	\$17,500,000	\$19,700,000
Total (rounded)	1460	270,000	13,800	284,000	\$28,000,000	\$104,000,000	\$132,000,000

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

Current Inventory	% by sector	
Total # of facilities:	322	
Total private sector	268	83.2%
Total public sector	54	16.8%

Table 2: Average Annual EPA Burden and Cost – NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU) (Renewal)

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
Observe initial performance test ^c	24	1	24	0	0	0	0	\$0
Observe repeat performance test ^d	24	0.2	4.8	0	0	0	0	\$0
Review initial notification	0.5	1	0.5	0	0	0	0	\$0
Review notification of CEMS demonstration	0.5	1	0.5	0	0	0	0	\$0
Review notification of initial performance test	0.5	1	0.5	0	0	0	0	\$0
Review performance test report	8	1	8	0	0	0	0	\$0
Review quality assurance program certification	0.5	1	0.5	0	0	0	0	\$0
Review startup, shutdown, and malfunction report (10% of respondents)	8	1	8	32.2	257.6	12.88	25.76	\$13,890.20
Review semiannual compliance report	8	1	8	322	2,576	128.8	257.6	\$138,902.04
Review notification of compliance status	0.5	1	0.5	0	0	0	0	\$0
Review site-specific performance evaluation test plan	8	1	8	264	2,113	106	211	\$113,944.25
Review request to use alternative monitoring procedure (10% of respondents)	0.5	1	0.5	26	13	1	1	\$712.15
Travel Expenses ^e								\$400
TOTAL (ROUNDED)^f						5,700		\$268,000

Footnotes:

^a EPA estimates an average of 727 units at 322 existing facilities and no new units per year will be subject to the NESHAP over the next 3 years.

^b This ICR uses the following labor rates: \$48.08 (technical), \$64.80 (managerial), and \$26.02 (clerical). 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.

^c EPA estimates it will observe 20% of initial performance tests.

^d EPA assumes 20% of initial performance tests must be repeated due to failure.

^e EPA estimates annual travel expenses to be \$400 [(1 person x 1 plant/year x 3 days/plant x \$50 per diem) + (\$250 round trip/plant x 1 plant/year) = \$400/year].

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