Burden item	(A) Hours per Occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting requirements					
A. Familiarization with Regulatory Requirements	1	1	1	23	23
B. Required activities					
Initial performance test for Eb <sup>c, d, e</sup>	24	1	24	0.33	7.92
Repeat performance test for Eb e, f	24	1	24	0.07	1.68
Demonstration/CEMS for Eb <sup>c, d</sup>	24	1	24	0.33	7.92
Repeat CEM demonstration Eb <sup>f</sup>	24	1	24	0.07	1.68
Annual compliance test for Ea g, i	24	1	24	18	432
Annual compliance test for Eb e, h	24	1	24	5	120
Appendix F audit for Ea (in-situ)	125	8	1,000	0	0
Appendix F audit for Ea (extractive)	36	8	288	0	0
C. Create Information	See 3B				
D. Gather information  E. Write report	See 3B				
Notification of construction/reconstruction for Ea	2	1	2	0	0
Notification of actual startup – Ea	2	1	2	0	0
Notification of initial performance test – Ea	2	1	2	0	0
Notification of CMS demonstration – Ea	2	1	2	0	0
Notification of construction/reconstruction – Eb <sup>c, d</sup>	2	1	2	0.33	0.66
Notification of initial performance test – Eb <sup>c, d</sup>	2	1	2	0.33	0.66
Notification of CMS demonstration – Eb <sup>c,d</sup>	2	1	2	0.33	0.66
Annual compliance reports for Ea	16	1	16	18	288
Annual opacity report of no excess emission for Ea <sup>j</sup>	8	1	8	14.4	115.2
Annual opacity report for excess emission for Ea <sup>j</sup>	16	1	16	3.6	57.6
Report of daily weight of MSW and fuel for Ea	34	4	136	18	2448
Appendix F reports for Ea	11	4	44	18	792
Initial compliance report for Eb <sup>c,d</sup>	40	1	40	0.33	13.2
Annual compliance report for Eb	40	1	40	5	200
Semiannual excess emission report Eb k	17	2	34	5	170
Appendix F reports for Eb <sup>1</sup>	11	4	44	5	220
Initial site selection analysis/report for Eb <sup>c, d</sup>	270	1	270	0.33	89
Public meeting and comment response for Eb <sup>c,d</sup>	140	1	140	0.33	46.2
Subtotal for Reporting Requirements					
4. Recordkeeping requirements					
A. Familiarization with Regulatory Requirements	See 3A				

B. Plan activities	See 4E				
C. Implement activities	See 4E				
D. Develop record system	See 4E				
E. Time to enter information					
Records of SSM for Ea <sup>m</sup>	1.5	104	156	18	2,808
Record emission measurements Ea $^{\rm m}$	1.5	104	156	18	2,808
Record of employee review of operation for Ea <sup>n</sup>	4	2	8	18	144
Record of emission rates, and computation tests for Eb $^{\circ}$	1.5	94	141	5	705
Record of SSM for Eb °	1.5	94	141	5	705
Record of employee review of operation for Eb <sup>n</sup>	4	2	8	5	40
Record amount of sorbent for Hg control for Eb	0.1	94	9.4	5	47
F. Train personnel	See 4E				
G. Audits	See 4E				
Subtotal for Recordkeeping Requirements					
TOTAL LABOR BURDEN AND COST (rounded) <sup>p</sup>					
TOTAL CAPITAL AND O&M COST (rounded) <sup>p</sup>					
GRAND TOTAL (rounded) <sup>p</sup>					

- <sup>a</sup> On average, EPA estimates 23 existing sources will be subject to the NESHAP, including 13 sources subject to Ea, and 2019 which will become subject to Subpart Eb.
- <sup>b</sup> This ICR uses the following labor rates: \$112.98 (technical), \$149.35 (managerial), and \$54.81 (clerical). These rates at June 2017, "Table 2. Civilian workers, by occupational and industry group." The rates are from column 1, "Total compen packages available to those employed by private industry. We have estimated that the contractors' rate for emission testing
- <sup>c</sup> Applies to new or reconstructed sources only.
- <sup>d</sup> EPA assumes one existing facility will implement process changes over the next 3 years.
- <sup>e</sup> We have assumed that it will take an emission testing contractor 1,053 hours to perform both initial performance test and repeat perfo
- <sup>f</sup> We have assumed that 20 percent of the respondents will have to repeat a performance test or CEMS demonstration for I
- <sup>g</sup> We have assumed that all of the 18 respondents for subpart Ea will have to complete an annual compliance test.
- <sup>h</sup> We have assumed that all 5 respondents for subpart Eb will have to complete an annual compliance test.
- <sup>1</sup> We have assumed that it will take an emission testing contractor 826 hours to complete an annual compliance test for Eb.
- <sup>j</sup> We have assumed that 80 percent of respondents will file an opacity report of no excess emission for Ea and will submit an opacity report of excess emission for Ea and submit periodic reports on a quarterly basis.
- <sup>k</sup> We have assumed that 5 of the respondents will be required to write semiannual excess emission report for Eb two times per year.
- <sup>1</sup>We have assumed that 5 of the respondents will write the appendix F reports four times per year.
- <sup>m</sup> We have assumed that all 18 respondents for subpart Ea will each take 104 hours to complete task.
- <sup>n</sup>We have assumed that all 18 respondents for subpart Ea and all 5 respondents for subpart Eb will each take 4 hours two t
- ° We have assumed that each of the 5 respondents subject to Eb will take 1.5 hours 94 times per year to enter information.
- <sup>p</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

149.35	54.81			
(F) Manageme nt person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Emission Test Person- Hours per Occurrence	(I) Emission Testing Contractor Person-Hours per Year (HxD)	(J) Total Cost per year <sup>b</sup>
1.15	2.3	1	23	\$4,736.36
0.40	0.79	1,053	347	\$28,796.55
0.08	0.17	1,053	73.71	\$6,108.36
0.40	0.79	470	155.1	\$13,405.35
0.08	0.17	470	32.9	\$2,843.56
21.6	43.2	826	14,868	\$1,243,841.11
6	12	1,053	5,265	\$436,311.42
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0.03	0.07	0	0	\$83.11
0.03	0.07	0	0	\$83.11
0.03	0.07	0	0	\$83.11
14.4	28.8	0	0	\$36,267.41
5.76	11.52	0	0	\$14,506.96
2.88	5.76	0	0	\$7,253.48
122.4	244.8	0	0	\$308,272.97
39.6	79.2	0	0	\$99,735.37
0.66	1.32	0	0	\$1,662.26
10	20	0	0	\$25,185.70
8.5	17	0	0	\$21,407.85
11	22	0	0	\$27,704.27
4.455	8.91	0	0	\$11,220.23
2.31	4.62	0	0	\$5,817.90
5,791			20,765	
	26,556		\$2,295,326	

140.4	280.8	0	0	\$353,607.23
140.4	280.8	0	0	\$353,607.23
7.2	14.4	0	0	\$18,133.70
		0		
35.25	70.5		0	\$88,779.59
		0		
35.25	70.5		0	\$88,779.59
2	4	0	0	\$5,037.14
2.35	4.7	0	0	\$5,918.64
8,346			0	
	8,350			\$914,000
	34,900			\$3,210,000
				\$226,000
				\$3,440,000

hr/resp 167 No. response 209

5 sources subject to Eb. EPA estimates one plant (respondent) to startup in

re from the United States Department of Labor, Bureau of Labor Statistics, sation." They have been increased by 110 percent to account for the benefit  $\xi$  would be \$80.00 per hour.

rmance tests for subpart Eb.  $\Xi b$ .

periodic reports on a semiannual basis, and 20 percent of respondents will file

imes per year to record employee review of operations.

## Capital/Startu

Α
CEMs for
subpart Ea
CEMs for
subpart Eb
Total

up vs. O&M Costs

В		С	D	E	F	G
	\$60,000	0	\$0	\$8,972	18	\$161,496
	\$60,000	0.33	\$20,000	\$8,972	5	\$44,860
			\$20,000			\$206,000

\$226,000

## **Assumptions:**

<sup>a</sup> On average, EPA estimates 23 existing sources will be subject to the NESHAP, including 13 sources subject to Ea, and 5 sources subject to (respondent) to startup in 2019 which will become subject to Subpart Eb.

5

24

5

24

1

1

5

0.33

25

7.92

1.25

0.40

1,610

- <sup>b</sup> This ICR uses the following labor rates: \$64.80 per hour for Managerial (GS-13, Step 1, \$30.05 + 60%); \$48.08 per hour for Technical la \$26.02 per hour for Clerical (GS-6, Step 3, \$16.26 + 60%). The rates have been increased by 60 percent to account for the benefit packages
- <sup>c</sup> Applies to new or reconstructed sources only.

Review annual compliance reports for Eb

Review siting requirements study for Eb c

TOTAL ANNUAL BURDEN AND COST (rounded)

- <sup>d</sup> We have assumed that 20 percent of the respondents will repeat performance test for Eb.
- <sup>e</sup> We have assumed that 80 percent of respondents will file an opacity report of no excess emission for Ea.
- <sup>f</sup> We have assumed that 20 percent of respondents will file an opacity report of excess emission for Ea.
- <sup>g</sup> We have assumed that 18 of the respondents will write the appendix F reports four times per year for Ea.

- <sup>h</sup> We have assumed that 5 of the respondents will be required to write semiannual excess emission report for Eb two times per year.
- $^{\scriptscriptstyle \mathrm{i}}$  We have assumed that 5 of the respondents will write the appendix F reports four times per year.

<sup>&</sup>lt;sup>j</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

## 26.02

26.02	
(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ b
0	\$0
5.94	\$3,202.97
0	\$0
0.792	\$427.06
0	\$0
0.08	\$45.29
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
11.52	\$6,211.81
0.72	\$388.24
3.6	\$1,941.19
57.6	\$31,059.07
32.4	\$17,470.73
0.07	\$35.59
0.26	\$142.35
0.17	\$88.97
1.32	\$711.77
12	\$6,470.64
10	\$5,392.20
2.5	\$1,348.05
0.79	\$427.06
	\$75,400

to Eb. EPA estimates one plant

bor (GS-12, Step 3, \$16.26 + 60%), and available to government employees.

Table 1b: Annual Respondent Burden and Cost Breakdown by Affected Sector- NSPS for Municipal Solid Waste ( CFR Part 60, Subparts Ea and Eb) (Renewal)

Affected Sector	Number of Responses	Labor Hours			Labor Cost
		Reporting			
Private	90	11,419	3,591	15,000	\$1,380,300
Public (State/Local/Tribal)	119	15,137	4,760	19,900	\$1,829,700
Total	209	26,556	8,350	34,900	3,210,000

<sup>\*</sup>Assumes 57% of respondents are public sector owned by state or local entities and privately operated. The ren are owned and operated by the private sector. There are no Federally-owned facilities.

## Combustors (40

Capital and O&M Cost
\$97,180
\$128,820
226,000

naining facilities

# of facilities

	Ea	Eb	Total	Percent by Sector	
Public-Owned	8	5	13	57%	
Private-Owned	10	0	10	43%	
	18	5	23		