

Category	Number of Respondents	Reporting Hours	Recordkeeping Hours	Total Respondent Labor Hours	Respondent Labor Cost
Private	19	75,951	8,653	84,600	\$9,640,000
State & Local Government	4	15,990	1,822	17,800	\$850,000
Total	23	92,000	10,000	102,000	\$10,500,000

Capital & O&M Cost	Number of Responses
\$857,000	49
\$180,000	10
\$1,040,000	59

1,729 hrs/response

Burden item	(A) Person-hours per occurrence	(B) No. of occurrence per respondent per year	(C)	(D)	(E)
			Person- hours per respondent per year (C=AxB)	Respondents per year ^{a, b}	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	4	1	4	19	76
B. Required Activities					
i. Initial performance tests and reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	775	1	775	0	0
ii. CEMS demonstration (SO ₂ , NO _x , opacity, CO, CO ₂ , O ₂)					
a. Installation of CEM units	225	1	225	0	0
b. Initial demonstration	450	1	450	0	0
iii. Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	775	1	775	19	14,725.00
iv. Quarterly Appendix F audits of CEMS (SO ₂ , NO _x , CO)					
a. RATA audit (one per year) ^d	350	2.35	822.5	19	15,627.50
b. RAA audit (three per year) ^e	130	7.05	916.5	19	17,413.50
c. Daily calibration and operation ^f	1	858	858	19	16,302.00
C. Create Information	See 3B				
D. Gather Information	See 3E				
E. Report Preparation					
i. Plant startup					
a. Plant Control Plan	40	1	40	0	0
b. Notification of Contract Awards	4	1	4	0	0
c. Notification of on-site construction start	4	1	4	0	0
d. Notification of construction completion	4	1	4	0	0
e. Notification of final completion	4	1	4	0	0
ii. Notification of initial performance tests	4	1	4	0	0
iii. Initial compliance reports	40	1	40	0	0
iv. Notification of CEMS demonstration	4	1	4	0	0
v. Initial CEMS demonstration report	90	1	90	0	0
vi. Annual compliance reports	40	2.3	92	19	1,748
vii. Semiannual excess emission reports ^g	40	2	80	1.9	152
Reporting Subtotal					
4. Recordkeeping Requirements					

A. Familiarization with Regulatory Requirements	See 3A				
B. Plan Activities	See 3B				
C. Implement Activities	See 3B				
D. Develop Record System	N/A				
E. Record information					
i. Record startups, shutdowns, and malfunctions ^h	4	47	188	19	3,572
ii. Records of all emission rates, computations, tests ^h	4	47	188	19	3,572
iii. Records of employee review of operations manual	4	1	4	19	76
iv. Record amount of sorbent used for Hg and dioxin/furan control	4	4	16	19	304
F. Personnel Training	N/A				
G. Time for audits	N/A				
Recordkeeping subtotal					
TOTAL LABOR BURDEN AND COST (Rounded):ⁱ					
Capital and O&M Cost (Rounded):ⁱ					
GRAND TOTAL (Rounded):ⁱ					

Assumptions:

^a Assumes an average of 19 private respondents and 2.35 affected facilities (i.e., sources or units) per respondent [54 facilities at

^b No additional facilities will become subject to the standard over the next three years.

Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, Table 2. Civil The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit not performed for three of the four quarterly audits. Audits of the diluent monitor (O₂ or CO₂) are not required because tests on SO

^e Relative accuracy audits (RAA) occur three times per year for each affected facility (3 x 2.35 = 7.05).

^f Daily calibration and operation data occurs daily [365 x 2.35 = 858 (Rounded)].

^g Assumes 10 percent of private sources (1.9) have affected facilities with excess emissions and must submit two semiannual reports

^h Assumes 47 weeks of operation (90 percent availability) per year per facility.

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

(F) Management person-hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost \$ ^c
3.8	7.6	\$9,954.97
0	0	\$0
0	0	\$0
0	0	\$0
736.25	1472.5	\$1,928,775.48
781.375	1,562.8	\$2,046,990.75
870.68	1,741.4	\$2,280,932.55
815.1	1630.2	\$2,135,341.11
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
87.4	174.8	\$228,964.31
7.6	15.2	\$19,909.94
75,951		\$8,650,869

Respondant Rates

(Source: <http://www.bls.gov/news.release/ecec.t02.htm>)

<u>Labor Type</u>	<u>Total Compensation (\$/hr)</u>	<u>Loaded Rate (Rate + 110%rate)</u>
Mgmt.	\$70.19	\$147.40
Tech.	\$56.15	\$117.92
Cler.	\$27.15	\$57.02

2.35

44.65

9.4

178.6	357.2	\$467,883.60
178.6	357.2	\$467,883.60
3.8	7.6	\$9,954.97
15.2	30.4	\$39,819.88
8,653		\$985,542
84,600		\$9,640,000
		\$857,000
		\$10,500,000

t 23 plants; 54/23 = 2.35].

ilian Workers, by occupational and industry group.
 packages available to those employed by private
 2 and CO monitors will incorporate the use of the

ports.

Burden item	(A) Person-hours per occurrence	(B) No. of occurrence per respondent per year	(C) Person- hours per respondent per year	(D) Respondents per year ^{a, b}	(E) Technical person- hours per year
			(C=AxB)		(E=CxD)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting Requirements					
A. Familiarization with Regulatory Requirements	4	1	4	4	16
B. Required Activities					
i. Initial performance tests and reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	775	1	775	0	0
ii. CEMS demonstration (SO ₂ , NO _x , opacity, CO, CO ₂ , O ₂)					
a. Installation of CEM units	225	1	225	0	0
b. Initial demonstration	450	1	450	0	0
iii. Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	775	1	775	4	3,100.00
iv. Quarterly Appendix F audits of CEMS (SO ₂ , NO _x , CO)					
a. RATA audit (one per year) ^d	350	2.35	822.5	4	3,290.00
b. RAA audit (three per year) ^e	130	7.05	916.5	4	3,666.00
c. Daily calibration and operation ^f	1	858	858	4	3,432.00
C. Create Information	See 3B				
D. Gather Information	See 3E				
E. Report Preparation					
i. Plant startup					
a. Plant Control Plan	40	1	40	0	0
b. Notification of Contract Awards	4	1	4	0	0
c. Notification of on-site construction start	4	1	4	0	0
d. Notification of construction completion	4	1	4	0	0
e. Notification of final completion	4	1	4	0	0
ii. Notification of initial performance tests	4	1	4	0	0
iii. Initial compliance reports	40	1	40	0	0
iv. Notification of CEMS demonstration	4	1	4	0	0
v. Initial CEMS demonstration report	90	1	90	0	0
vi. Annual compliance reports	40	2.3	92	4	368
vii. Semiannual excess emission reports	40	2	80	0.4	32
Reporting Subtotal					
4. Recordkeeping Requirements					
A. Familiarization with Regulatory Requirements	See 3A				

B. Plan Activities	See 3B				
C. Implement Activities	See 3B				
D. Develop Record System	N/A				
E. Record information					
i. Record startups, shutdowns, and malfunctions ^h	4	47	188	4	752
ii. Records of all emission rates, computations, tests ^h	4	47	188	4	752
iii. Records of employee review of operations manual	4	1	4	4	16
iv. Record amount of sorbent used for Hg and dioxin/furan control	4	4	16	4	64
F. Personnel Training	N/A				
G. Time for audits	N/A				
Recordkeeping subtotal					
TOTAL LABOR BURDEN AND COST (Rounded):					
Capital and O&M Cost (see Section 6(b)(iii)):					
TOTAL COST:					

Assumptions:

- ^a Assumes an average of 4 public respondents and 2.35 affected facilities (i.e., sources or units) per respondent [54 facilities at 2
- ^b No additional facilities will become subject to the standard over the next three years.
- Step 5, \$41.07 x 1.6), \$48.75 Technical rate (GS-12, Step 1, \$30.47 x 1.6), and \$26.38 Clerical rate (GS-6, Step 3, \$16.49 x 1.6) performed for three of the four quarterly audits. Audits of the diluent monitor (O₂ or CO₂) are not required because tests on SO
- ^e Relative accuracy audits (RAA) occur three times per year for each affected facility (3 x 2.35 = 7.05).
- ^f Daily calibration and operation data occurs daily [365 x 2.35 = 858 (Rounded)].
- ^g Assumes 10 percent of public sources (0.4) have affected facilities with excess emissions and must submit two semiannual rep
- ^h Assumes 47 weeks of operation (90 percent availability) per year per facility.
- ⁱ Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

(F) Management person-hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost \$ ^c
0.8	1.6	\$874.82
0	0	\$0
		\$0
0	0	\$0
0	0	\$0
155	310	\$169,495.60
164.5	329.0	\$179,884.04
183.30	366.6	\$200,442.22
171.6	343.2	\$187,648.03
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
18.4	36.8	\$20,120.77
1.6	3.2	\$1,749.63
15,990		\$760,215

Source: http://www.opm.gov/oca/11tables/html/g_s_h.asp

<u>Labor Type</u>	Hourly Mean Wage	With Fringe & Overhead
(GS- 12, step 1) - Tech.	30.47	\$48.75
(GS- 13, step 5) - Mgmt.	41.07	\$65.71
(GS-6, step 3) - Cler.	16.49	\$26.38

37.6	75.2	\$41,116.35
37.6	75.2	\$41,116.35
0.8	1.6	\$874.82
3.2	6.4	\$3,499.26
1,822		\$86,607
17,800		\$850,000
		\$180,000
		\$1,030,000

[3 plants; 54/23 = 2.35].

). These rates are from the Office of Personnel
 2 and CO monitors will incorporate the use of the

ports.

Activity	(A) No. occurrence per year	(B) EPA person- hours per occurrence	(C) Technical person- hours per year (C=AxB)	(D) Management person-hours per year (Ex0.05)	(E) Clerical person- hours per year (Ex0.1)	(H) Cost ^a \$
1. Applications	N/A					
2. Report Reviews ^{b, c}						
i. Review preliminary and final material separation plans and siting analysis	0	8	0	0	0	\$0
ii. Review notification of construction	0	2	0	0	0	\$0
iii. Review notification of startup	0	2	0	0	0	\$0
iv. Review notification of initial performance test	0	8	0	0	0	\$0
v. Review notification of initial CEMS demonstration	0	4	0	0	0	\$0
vi. Review initial performance test report	0	40	0	0	0	\$0
vii. Review initial CEMS demonstration report	0	40	0	0	0	\$0
viii. Review annual compliance report ^d	23	92	2,116	105.8	211.6	\$115,694.42
ix. Review semi-annual excess emission report ^e	4.6	16	73.6	3.68	7.36	\$4,024.15
3. Prepare annual summary report	1	200	200	10	20	\$10,935.20
TOTAL ANNUAL COST (rounded)^f				2,750		\$131,000

Assumptions:

Managerial rate (GS-13, Step 5, \$41.07 x 1.6), \$48.75 Technical rate (GS-12, Step 1, \$30.47 x 1.6), and \$26.38 Clerical rate (No additional sources will become subject to the standard over the next three years. We also assume affected air quality projects in U.S. territories have already submitted a State Plan and/or negative declaration.

^c Assumes 54 affected units at 23 plants.

^d Assumes four hours to review the annual compliance report for each plant (4 x 23 = 92).

^e Assumes submission of semiannual excess emission reports will be required for 10 percent of units (2.3); (2 x 2.3 = 4.6).

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

EPA

Source: http://www.opm.gov/oca/11tables/html/gs_h.asp

	Hourly Mean Wage	With Fringe & Overhead
(GS- 13, step 5) - Mgmt.	41.07	\$65.71
(GS- 12, step 1) - Tech.	30.47	\$48.75
(GS-6, step 3) - Cler.	16.49	\$26.38

GS-6, Step 3, \$16.49 x 1.6).
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