

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
Year	(A) Number of New Respondents	(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
1	0.33	12	0	0
2	0.33	12.3	0	0
3	0.33	12.7	0	0
Average	0.33	12.3	0	0

(E) Number of Respondents
(E=A+B+C-D)
12.3
12.7
13.0
12.7

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Initial notification	0.33	1	0	0.33
Notification of compliance status	0.33	1	0	0.33
Request for extension of compliance	0.33	1	0	0.33
Notification of special compliance requirements	0.33	1	0	0.33
Notification of initial performance test	0	1	0	0
Additional notification requirements for sources with CMS	0	1	0	0
Notification of adjustments to time periods	0.33	1	0	0.33
Notification of changes to information provided	0.33	1	0	0.33
30-day notification of excess emissions	0.33	1	0	0.33
Initial performance test report	0	1	0	0
Inspection and monitoring plan	0.33	1	0	0.33
Annual report	0.33	1	0	0.33
Annual excess emissions report	0.33	1	0	0.33
Initial report on compliance approach	0.33	1	0	0.33
			Total	3.6

CMS - Continuous Monitoring System

hrs/response: 4.4

Assumes the new/reconstructed source to demonstrate compliance using the HAP fraction emitted standard, utilizing a combination of pretreatment and wastewater treatment plant modifications to achieve this performance standard. This compliance option does not require performance testing or a CMS.

Added burden item because this is an existing requirement for new sources only that was missing in the last ICR table.

Revised from semiannual to annual per RTR. Does not apply to existing sources.

Revised from semiannual to annual per RTR. Does not apply to existing sources.

Table 1: Annual Respondent Burden and Cost – NESHAP for Publicly Owned Treatment Works

Labor Rates:

Burden item	A	B	C	D
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a
1. Applications	N/A			
2. Surveys and studies	N/A			
3. Reporting requirements				
A. Familiarization with regulatory requirements ^c	0.5	1	1	12
B. Required activities				
Initial notification ^d	2	1	2	0.33
Notification of compliance status ^d	2	1	2	0.33
C. Create information	See 3B			
D. Gather existing information	See 3B			
E. Write reports				
Request for extension of compliance	2	1	2	0.33
Notification of special compliance requirements	2	1	2	0.33
Notification of initial performance test ^d	N/A			
Additional notification requirements for source with CMS ^d	N/A			
Notification of adjustments to time periods	2	1	2	0.33
Notification of changes to information provided	2	1	2	0.33
30-day notification of excess emissions ^d	1	1	1	0.33
Initial performance test report ^d	N/A			
Inspection and monitoring plan ^d	2	1	2	0.33
Annual report ^d	1	1	1	0.33
Annual excess emissions report ^d	2	1	2	0.33
Initial report on compliance approach ^{d,e}	2	1	2	0.33
Reporting Subtotal				
4. Recordkeeping				
A. Familiarization with regulatory requirements	See 3A			
B. Plan activities	See 3E			
C. Implement activities	See 3E			
D. Develop record system	See 3E			
E. Time to enter information				
Records of annual inspections ^d	2	1	2	0.33
Records of inspections, defects, and repair delays ^d	2	1	2	0.33
F. Time to transmit or disclose information	N/A			

G. Time to train personnel	N/A			
H. Time for audits	N/A			
Recordkeeping Subtotal				
TOTAL LABOR BURDEN AND COSTS (rounded)^f				
TOTAL CAPITAL AND O&M COSTS (rounded)^f				
GRAND TOTAL (rounded)^f				

CMS - Continuous Monitoring System

N/A - Not Applicable

Assumptions:

^a EPA estimates 12 existing sources and one new/reconstructed source will be subject to the standard over the three-

^b This ICR uses the following labor rates for publicly owned facilities: \$48.08 (technical), \$64.80 (managerial), and Personnel Management (OPM), 2017 General Schedule, which excludes locality rates of pay. The rates have been in packages available to government employees.

^c This burden represents the time existing respondents spend familiarizing themselves with the regulatory requireme

^d New sources must install covers and controls, or comply with the HAP fraction emitted standard. Assumes one ne using the HAP fraction emitted standard over the next three years, utilizing a combination of pretreatment and waste performance standard. This compliance option does not require performance testing or a CMS, but does require initi

^e The NESHAP specifies that existing facilities are subject to the initial report; however, all existing facilities previc submit an initial report.

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

Works (40 CFR Part 63, Subpart VVV) (Renewal)

\$48.08 \$64.80 \$26.02

E	F	G	H
Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
6	0.3	0.6	\$323.53
0.66	0.03	0.07	\$35.50
0.66	0.03	0.07	\$35.50
0.66	0.03	0.07	\$35.50
0.66	0.03	0.07	\$35.50
0.66	0.03	0.07	\$35.50
0.66	0.03	0.07	\$35.50
0.66	0.03	0.07	\$35.50
0.66	0.03	0.07	\$35.50
0.33	0.02	0.03	\$17.94
0.66	0.03	0.07	\$35.50
0.33	0.02	0.03	\$17.94
0.66	0.03	0.07	\$35.50
0.66	0.03	0.07	\$35.50
14.5			\$678.91
0.66	0.03	0.07	\$35.50
0.66	0.03	0.07	\$35.50

Source Type	No.
Existing	12.0
New (other sectors)	0.33

1.5			\$71.00
16			\$750
			\$0
			\$750

-year period of this ICR.

\$26.02 (clerical). These rates are from the Office of increased by 60 percent to account for the benefit

ents.

w/reconstructed source will demonstrate compliance
 water treatment plant modifications to achieve this
 al notifications, monitoring, recordkeeping and reporting.

ously submitted the required information, so none will

Agency Rates

Source: Office of Personnel Management (OPM), 2017 General Schedule

<u>Labor Type</u>	<u>Total Compensation (\$/hr)</u>	<u>Loaded Rate</u> (Rate + 110%rate)
(GS- 13, step 5) - Mgmt.	40.5	\$64.80
(GS- 12, step 1) - Tech.	30.05	\$48.08
(GS-6, step 3) - Cler.	16.26	\$26.02

Table 2: Average Annual EPA Burden and Cost – NESHAP for Publicly Owned Treatment Work

Labor Rates: \$48.08

Burden item	A	B	C	D	E
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)
Initial performance test ^c	N/A				
Repeat initial performance test ^c	N/A				
Report review					
Initial notification	2	1	2	0.33	0.66
Notification of compliance status ^c	2	1	2	0.33	0.66
Request for extension of compliance	0.5	1	1	0.33	0.17
Notification of special compliance requirements ^c	2	1	2	0.33	0.66
Notification of initial performance test ^c	2	1	2	0	0
Additional notification requirements for sources with CMS ^c	2	1	2	0	0
Notification of adjustments to time periods ^c	2	1	2	0.33	0.66
Notification of changes to information provided	2	1	2	0.33	0.66
30-day notification of excess emissions	2	1	2	0.33	0.66
Initial performance test report ^c	2	1	2	0	0
Inspection and monitoring plan ^c	2	1	2	0.33	0.66
Annual report ^c	1	1	1	0.33	0.33
Annual excess emissions report ^c	1	1	1	0.33	0.33
Initial report on compliance approach ^c	2	1	2	0.33	0.66
TOTAL^d					

CMS - Continuous Monitoring System

N/A - Not Applicable

Assumptions:

^a EPA estimates 12 existing sources and one new/reconstructed source will be subject to the standard over the three-year period.

^b This ICR uses the following labor rates: \$48.08 (technical), \$64.80 (managerial), and \$26.02 (clerical). These rates are from (OPM), 2017 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for government employees.

^c Existing sources have no notification and reporting activities under this NESHAP and demonstrate compliance with the rule that meet all requirements specified in the appropriate industrial NESHAP(s). New sources are subject to rule emission limits, performance testing, plan development, and reporting activities. There is one new source expected to be subject to these requirements.

^d Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.

s (40 CFR Part 63, Subpart VVV) (Renewal)

\$64.80 \$26.02

F	G	H
Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
0.03	0.07	\$35.50
0.03	0.07	\$35.50
0.01	0.02	\$9.34
0.03	0.07	\$35.50
0	0	\$0
0	0	\$0
0.03	0.07	\$35.50
0.03	0.07	\$35.50
0.03	0.07	\$35.50
0	0	\$0
0.03	0.07	\$35.50
0.02	0.03	\$17.94
0.02	0.03	\$17.94
0.03	0.07	\$35.50
7		\$329

Agency Rates

Source: Office of Personnel Management (OPM), 2017 General Schedule

	Hourly Mean Wage	With Fringe & Overhead
(GS- 12, step 1) - Tech.	30.05	\$48.08
(GS- 13, step 5) - Mgmt.	40.5	\$64.80
(GS-6, step 3) - Cler.	16.26	\$26.02

Revised to annual report. Not required of existing sources.
 Revised to annual report. Not required of existing sources.

iod of this ICR.

m the Office of Personnel Management
 t for the benefit packages available to

e by operating treatment and control devices
 s, control requirements, and related
 irements over the three-year period of this

Capital/Startup vs. Operation and Maintenance (O&M) Costs

EPA expects the new/reconstructed source to demonstrate compliance using the HAP fraction emitted standard, utilizing a combination of pretreatment and wastewater treatment plant modifications to achieve this performance standard. No new control or monitoring equipment (CMS) is expected.