

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments) EPA ICR Number 2028.10, OMB Control Number 2060-0551.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters were proposed on January 13, 2003 and promulgated on September 13, 2004. On June 19, 2007, the United States Court of Appeals for the District of Columbia Circuit vacated and remanded the Boilers NESHAP. On June 4, 2010 EPA issued a proposal in response to the vacatur, and in March 2011 EPA promulgated the rule in response to the vacatur. Also in March 2011, EPA issued a voluntary reconsideration of the final rule and then proposed its reconsideration of the rule in December 2011. The Boiler MACT reconsideration was finalized in January 2013. On January 21, 2015, EPA issued a proposal in response to certain issues raised in petitions of reconsideration on the January 13, 2013 final rule. EPA subsequently published a final rule and notice of action on reconsideration on November 20, 2015. The 2015 final rule did not increase any new recordkeeping and reporting burdens. Subsequently, the United States Court of Appeals for the District of Columbia Circuit, in a decision issued in July 2016, vacated several of the emission standards to EPA based on the court's review of EPA's approach to setting those standards. On December 23, 2016, the United States Court of Appeals for the District of Columbia Circuit granted EPA's motion for rehearing on remedy and remanded without vacatur these affected MACT standards. Therefore, these emission standards have remained in effect since the court's decision.

The proposed amendments change several emission limits as part of EPA's response to this remand. The changes result in more stringent emission limits in some cases, which is expected to require additional recordkeeping and reporting burden. This supporting statement addresses incremental information collection activities that will be imposed by the amendments to the NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters.

The NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters applies to existing and new industrial, commercial, and institutional boilers and process heaters located at major sources of HAP. New facilities include those that commenced construction or reconstruction after June 4, 2010. This information is being collected to assure compliance with 40 CFR Part 63, Subpart DDDDD.

In general, all NESHAP standards require initial notifications, performance tests (if

sources are using add-on controls to demonstrate compliance), 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 deviation from an emission limitation (either a numerical emission limit, an operating limit, or an equipment or work practice standard), 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 the NESHAP.

This Information Collection Request (ICR) presents the burden to respondents and the Designated Administrator (i.e., U.S. EPA or a delegated authority) to implement the proposed NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters amendments. Respondents are owners or operators of existing and new industrial, commercial, and institutional boilers and process heaters located at major sources of HAP. The requirements described below are the minimum requirements that would be established by the amended NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters, as proposed. Although the Designated Administrator may choose to impose more stringent requirements, it is assumed for this burden estimate that the implemented plans mirror the NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain the file for at least 5 years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the EPA regional office.

Based on our review of compliance data submitted to EPA Compliance and Emissions Data Reporting Interface (CEDRI) and WebFIRE, we estimate that 25 facilities operating 36 existing large solid-fuel boilers and 3 facilities operating 3 new large solid fuel boilers are going to incur burden from additional requirements under the proposed amendments to the NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters. These facilities are expected to install new pollution control and monitoring equipment or increase the efficiency of existing equipment. A discussion of how the impacts of the proposed amendments were estimated is available in the docketed memo: Revised (2019) Methodology for Estimating Impacts for Industrial, Commercial, Institutional Boilers and Process Heaters National Emission Standards for Hazardous Air Pollutants.

While emission limits changes are being proposed for other subcategories, the only subcategories expected to incur additional burden from these amendments are existing and new large solid fuel-fired boilers. All of the sources in these subcategories whose compliance data indicate they may incur additional burden are owned and operated by the private industry (the "Affected Public"). None of the affected facilities in the United States are owned by state, local, tribal or the Federal government. They are all privately owned, for-profit businesses. We assume that they will all respond.

Over the next 3 years, approximately 25 respondents operating existing large solid fuel-

fired boilers and 3 respondents operating new solid fuel-fired boilers will be impacted by the new requirements under the standard as a result of these amendments. The industry growth rate, based on compliance data, indicates approximately 0.33 new solid fuel (biomass) boilers per year will be impacted.

The “burden” to the Affected Public may be found below in Tables 1 through 7 of Attachment 1. The proposed cost of this ICR to sources that are impacted by the changes in emission limits is \$375,000 in labor costs and \$540,000 in annualized capital costs and annual operations and maintenance costs, or \$307,000 per year if averaged over the first 3 years after the amendments are final. The total Agency cost during the first 3 years of the ICR is estimated to be \$37,800 or \$12,600 per year. The “burden” to the Agency may be found below in Tables 8 through 11 of Attachment 1. The burden includes the cost to Federal EPA and state agencies to implement the proposed amendments.

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:

- (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, HAP emissions from industrial, commercial, and institutional boilers and process heaters 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 DDDDD.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the 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 in order to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with the 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, leaks are being detected and repaired, and the standards are being met. The performance test may also be observed.

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

3. Nonduplication, Consultations, and Other Collection Criteria

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

3(a) Nonduplication

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, no duplication exists.

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

A public notice of this collection was provided in the Federal Register notice of proposed rulemaking entitled, "National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters: Amendments." The ICR for the final rulemaking will respond to all comments received.

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 3 years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the compliance data submitted through EPA's WebFIRE, which contains reports submitted to the EPA using the Compliance and Emissions Data Reporting Interface (CEDRI), to identify changes to units following the November 20, 2015 rule. The growth rate for the industry is based on the number of boilers reporting to CEDRI since the rule was finalized in 2013 and the number of boilers anticipated to incur an impact as a result of the amended emission limits. Approximately 25 existing respondents and 3 new respondents will be impacted by the proposed changes over the three-year period covered by this ICR.

Industry trade associations and other interested parties were contacted and provided an opportunity to comment on the burden associated with the standard as it was being developed, and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

In developing this ICR, we are providing all interested parties the opportunity to review and comment on the revised burden estimated in this ICR as a result of the proposed amendments.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and 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 proposed standards require the respondents to maintain all records, including reports and notifications for at least 5 years. This is consistent with the General Provisions as applied to the standards. EPA believes that the 5-year records retention requirement is consistent with the Part 70 permit program and the 5-year statute of limitations on which the permit program is based. The retention of records for 5 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 5 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 (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 the standard 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 new and existing industrial, commercial, or institutional boilers and process heaters. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed below.

| Standard (40 CFR Part 63, Subpart DDDDD) | SIC Codes | NAICS Codes |
|---|---|--------------------|
| Extractors of crude petroleum or natural gas | 1311/3121/2819 | 211 |
| Wood product manufacturing | 2421/2426/2429/2491/2435/2436/ 2439/2493/2431/2441/2448/ 2449/2499/2451/2452/3131 | 321 |
| Pulp and paper mills | 2611/2621/2631/2653/2679/2657/2652/26 55/2656/2671/2672/2679/2673/2674/3497/ 2675/2677/2678/2676/3842 | 322 |
| Chemical manufacturers | 2865/2869/2813/2879/2851/2899/2891/28 44/2893/2892 | 325 |
| Petroleum refineries and manufacturers of coal products. | 2911 | 324 |
| Manufacturers of leather, rubber and miscellaneous plastic products | 3111/3999/3083/3086/3085/3052/3949/30 69/3993 | 316/326/339 |
| Primary metal manufacturing | 3317 | 331 |
| Fabricated metal product manufacturing | 3443/3559/3429/3499/3599 | 332 |
| Transportation equipment | 3711/3714/3292/2396/2399/ | 336 |

| | | |
|--------------------------------------|---|-----|
| manufacturing | 2531/3499/3465/3531/3743 | |
| Electric, gas, and sanitary services | 4923/4924/4925/4931/4932/4939/4941/4971/4952/4961 | 221 |
| Hospitals | 8062/8069/8063 | 622 |
| Educational services | 8211/8222/8221/8244/8243/8299/7231/7241/8249/7911/7999/8748 | 611 |

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD). The proposed amendments do not change any of the required reports or records that are approved in the current ICR (2028.09).

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 impacted by the proposed amendments will use electronic reporting.

(ii) Respondent Activities

The proposed amendments do not change any of the required activities that are approved in the current ICR (2028.09). However, since some of the emission limits have changed the type of activities that each source may complete may change. Some sources are anticipated to install new controls and those sources must install, operate, calibrate and maintain the continuous monitoring systems (CMS) for the new control type. For example, sources that add a wet scrubber to comply with more stringent HCl emission limits initiate a CMS for pressure drop and liquid supply pressure, while sources that add a fabric filter would initiate CMS for a bag leak detection.

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

5(a) Agency Activities

The proposed amendments do not change any of the required activities that are approved in the current ICR (2028.09). These proposed amendments are expected to result in incremental burden on EPA to review changes to monitoring plans and monitoring parameters that are resulting from changes to the emission limits.

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 standards. 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

While the 2013 final NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters has a substantial impact on a significant number of small entities, the impacts on small entities related to these amendments is minor. According to the compliance data used to assess the impact of the proposed amendments, only one of the impacted respondents is a small entity. More information on these small entity impacts is available in the Regulatory Impact Analysis for this proposal.

The Boilers NESHAP does not contain any provisions reserved exclusively for the benefit of small entities. However, the regulation does contain several provisions that reduce the impact on all regulated entities, which include small entities. For instance, operating parameter monitoring is required instead of CEMS. The rule provides an option to demonstrate compliance with fuel analysis in lieu of stack testing for boilers combusting fuels with mercury, TSM8, or chlorine contents less than their associated emission limit. In addition, providing a work practice standard for small and limited use boilers and process heaters firing all fuel types and for boilers of all sizes firing natural gas, refinery gas, or other gas 1 fuels, the EPA has substantially reduced the burden of the rule, including reducing the burden on small entities. For example, for small

entities with only small or limited use boilers and process heaters installed, the option to demonstrate compliance using an annual, biennial, or every five-year tune-up is a substantial savings compared with the requiring stack testing, parameter monitoring, and add-on air pollution control devices. Additionally, compliance flexibilities exist for boilers and process heaters burning ultra-low sulfur liquid fuels, by reducing the requirement for subsequent performance tests.

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 at the end of this document in Tables 1-3: Annual Respondent Burden and Cost for Existing Large Solid Fuel Units – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments) for Years 1 through 3, Tables 4-6: Annual Respondent Burden and Cost for New Large Solid Fuel Units – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments) for Years 1 through 3, and Table 7: Summary of Annual Respondent Burden and Cost – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments).

The EPA is proposing a three-year period for sources to comply with the revised emission limits. Until that point the existing limits will remain in effect. Since a three year compliance period is proposed, the incremental ICR burden for reading the rule is estimated to be incurred in year 1 and the burden for implementing the rule is estimated to be incurred in year 3 of this ICR period.

6. Estimating the Burden and Cost of the Collection

Tables 1 through 7 of Attachment 1 present an itemization of the burden on the respondents anticipated to be impacted by the NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters for the recordkeeping and reporting requirements in the first 3 years following promulgation of the proposed amendments to the NESHAP. Tables 8 through 11 of Attachment 1 present an itemization of the Agency burden in the first 3 years following promulgation of the proposed amendments to the NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters. The individual burdens in Tables 1 through 11 of Attachment 1 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.

We are proposing to modify several emission limits in this rule. Costs associated with more stringent emission limits were estimated as part of the reporting and recordkeeping costs and include time for additional recordkeeping and reporting burden resulting from additional control or monitoring equipment anticipated to be installed as a result of the proposed changes.

The Agency may not conduct or 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 1,080 labor hours per year, as shown in Tables 1-3: Annual Respondent Burden and Cost for Existing Large Solid Fuel Units – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments) for Years 1 through 3, Tables 4-6: Annual Respondent Burden and Cost for New Large Solid Fuel Units – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments) for Years 1 through 3, and Table 7: Summary of Annual Respondent Burden and Cost – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments). 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

| | |
|------------|---------------------------|
| Managerial | \$141.06 (\$67.17+ 110%) |
| Technical | \$120.27 (\$57.27 + 110%) |
| Clerical | \$58.67 (\$27.94 + 110%) |

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, “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.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the revised emission standards in the proposed amendments. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and includes the annualized capital recovery factor for the equipment and other costs such as photocopying and postage.

The proposed amendments will require some facilities to add or modify continuous monitoring requirements for new and existing large solid fuel-fired boilers in order to meet the more stringent limits set for HCl, mercury, particulate matter, and carbon monoxide. These sources get three years to demonstrate compliance with these revised emission limits. When facilities comply with the revised standards by using emission capture systems and add-on controls, they are required to install monitoring systems to verify the operation and performance of the control devices.

The estimated costs for installing new control devices and monitoring devices, as well as the annual operation and maintenance (O&M) cost is shown in the table in Section 6(b)(iii).

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

| Capital/Startup vs. Operation and Maintenance (O&M) Costs | | | | | | |
|--|----------------------|-----------------|------------------------------------|---|-----------------|--|
| (A) | (B) | (C) | (D) | (E) | (F) | (G) |
| Boiler Type & CPMS | Capital/Startup Cost | Number of Units | Total Capital/Startup Cost (B x C) | Annualized Capital Cost + Annual O&M Costs for One Unit | Number of Units | Total Annualized Capital Cost + Annual O&M Costs (E x F) |
| YEAR 1 | | | | | | |
| Existing Large Solid Units | | | | | | |
| Opacity | \$25,812 | 0 | \$0 | \$9,855 | 0 | \$0 |
| Scrubber System | \$25,054 | 0 | \$0 | \$5,774 | 0 | \$0 |
| Bag Leak Detection System | \$26,300 | 0 | \$0 | \$10,000 | 0 | \$0 |
| DIFF Monitor | \$44,858 | 0 | \$0 | \$31,500 | 0 | \$0 |
| CO CEMS | \$153,700 | 0 | \$0 | \$42,600 | 0 | \$0 |
| New Large Solid Units | | | | | | |
| Scrubber System | \$25,054 | 0 | \$0 | \$5,774 | 0 | \$0 |
| YEAR 2 | | | | | | |
| Existing Large Solid Units | | | | | | |
| Opacity | \$25,812 | 0 | \$0 | \$9,855 | 0 | \$0 |
| Scrubber System | \$25,054 | 0 | \$0 | \$5,774 | 0 | \$0 |
| Bag Leak Detection System | \$26,300 | 0 | \$0 | \$10,000 | 0 | \$0 |
| DIFF Monitor | \$44,858 | 0 | \$0 | \$31,500 | 0 | \$0 |
| CO CEMS | \$153,700 | 0 | \$0 | \$42,600 | 0 | \$0 |
| New Large Solid Units | | | | | | |
| Scrubber System | \$25,054 | 0 | \$0 | \$5,774 | 0 | \$0 |
| YEAR 3 | | | | | | |
| Existing Large Solid Units | | | | | | |
| Opacity | \$25,812 | 6 | \$154,872 | \$9,855 | 6 | \$59,130 |
| Scrubber System | \$25,054 | 3 | \$75,162 | \$5,774 | 3 | \$17,322 |

| | | | | | | |
|-------------------------------------|-----------|---|--------------------|----------|---|------------------|
| Bag Leak Detection System | \$26,300 | 8 | \$210,400 | \$10,000 | 8 | \$80,000 |
| DIFF Monitor | \$44,858 | 1 | \$44,858 | \$31,500 | 1 | \$31,500 |
| CO CEMS | \$153,700 | 8 | \$1,229,600 | \$42,600 | 8 | \$340,800 |
| New Large Solid Units | | | | | | |
| Scrubber System | \$25,054 | 2 | \$50,108 | \$5,774 | 2 | \$11,548 |
| | | | | | | |
| Total (Rounded) ^b | | | \$1,770,000 | | | \$540,000 |

^a This figure represents the annualized capital cost of the new equipment plus the annual O&M costs of the new equipment. For a detailed explanation of the annualized cost, see the memorandum *Revised (2019) Methodology for Estimating Control Costs for Industrial, Commercial, Institutional Boilers and Process Heaters National Emission Standards for Hazardous Air Pollutants – Major Source* in EPA Docket ID Number EPA-HQ-OAR-2002-0058.

^b 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 \$1,770,000. This is the total of column D in the above table.

The total of the annualized capital cost and the annual operation and maintenance (O&M) costs for this ICR are \$540,000. This is the total of column G.

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 \$12,600.

This cost is based on the average hourly labor rate as follows:

| | |
|------------|--|
| Managerial | \$66.62 (GS-13, Step 5, \$41.64 + 60%) |
| Technical | \$49.44 (GS-12, Step 1, \$30.90 + 60%) |
| Clerical | \$26.75 (GS-6, Step 3, \$16.72 + 60%) |

These rates are from the Office of Personnel Management (OPM), 2019 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. Details upon which this estimate is based appear in Tables 8 through 10 of Attachment 1: Average Annual EPA Burden and Cost – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments) for Years 1 through 3 and Table 11 - Summary of Annual Agency Burden and Cost - NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments).

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 25 existing respondents will be impacted by the proposed amendments. It is estimated that an additional 3 new respondents will be impacted by the proposed amendments over the three-year period of this ICR. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

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 | (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 | 0 | 0 | 0 | 0 |
| 2 | 0 | 0 | 0 | 0 | 0 |
| 3 | 3 | 25 | 0 | 0 | 28 |
| Average | 1 | 8 | 0 | 0 | 9 |

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

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 9.

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

| Total Annual Responses | | | | |
|---------------------------------|------------------------------------|----------------------------------|--|-------------------------------------|
| (A) | (B) | (C) | (D) | (E) |
| Information Collection Activity | Number of Respondents ^a | Number of Responses ^b | Number of Existing Respondents That Keep Records But Do Not Submit | Total Annual Responses E=(BxC)+D |

| | Existing Sources | New Sources | Existing Sources | New Sources | Reports | |
|---|------------------|-------------|------------------|-------------|--------------|-----------|
| Total Annual Responses, In Year One | | | | | | |
| Reporting: Update Site-specific monitoring plan | 0 | 0 | 0 | 0 | 0 | 0 |
| Reporting: CPMS: Opacity: Annual | 0 | 0 | 0 | 0 | 0 | 0 |
| Reporting: CPMS: Scrubber: Annual | 0 | 0 | 0 | 0 | 0 | 0 |
| Reporting: CPMS: Bag Leak Detection: Annual | 0 | 0 | 0 | 0 | 0 | 0 |
| Reporting: CPMS: DIFF Monitor: Annual | 0 | 0 | 0 | 0 | 0 | 0 |
| Reporting: CPMS: CO CEMS: Annual | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | Total | 0 |
| Total Annual Responses, In Year Two | | | | | | |
| Reporting: Update Site-specific monitoring plan | 0 | 0 | 0 | 0 | 0 | 0 |
| Reporting: CPMS: Opacity: Annual | 0 | 0 | 0 | 0 | 0 | 0 |
| Reporting: CPMS: Scrubber: Annual | 0 | 0 | 0 | 0 | 0 | 0 |
| Reporting: CPMS: Bag Leak Detection: Annual | 0 | 0 | 0 | 0 | 0 | 0 |
| Reporting: CPMS: DIFF Monitor: Annual | 0 | 0 | 0 | 0 | 0 | 0 |
| Reporting: CPMS: CO CEMS: Annual | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | Total | 0 |
| Total Annual Responses, In Year Three | | | | | | |
| Reporting: Update Site-specific monitoring plan | 25 | 3 | 1 | 1 | 0 | 28 |
| Reporting: CPMS: Opacity: Annual | 6 | 0 | 1 | 0 | 0 | 6 |
| Reporting: CPMS: Scrubber: Annual | 3 | 2 | 1 | 1 | 0 | 5 |
| Reporting: CPMS: Bag Leak Detection: Annual | 8 | 0 | 1 | 0 | 0 | 8 |
| Reporting: CPMS: DIFF Monitor: Annual | 1 | 0 | 1 | 0 | 0 | 1 |
| Reporting: CPMS: CO CEMS: Annual | 8 | 0 | 1 | 0 | 0 | 8 |
| | | | | | Total | 56 |

^a EPA estimates that, as a result of the proposed amendments, 26 continuous parameter monitoring systems (CPMS) on existing pollution control devices will be required to be installed. EPA also estimates that, as a result of the proposed amendments, 2 new sources will be required to install CPMS on scrubbers. Additionally, EPA estimates that 25 existing sources and 3 new sources will update site-specific monitoring plans as a result of the proposed changes to the emission limits.

^b Facilities have three years to come into compliance after the proposed amendments are promulgated. EPA assumes that all facilities will comply in year three. Therefore, all additional responses as a result of these amendments are assumed to occur in year three.

The number of total annual responses in year one is zero. The number of total annual responses in year two is zero. The number of total annual responses in year three is 56.

The average annual labor costs are \$125,000. Details regarding these estimates may be found in Tables 1-3: Annual Respondent Burden and Cost for Existing Large Solid Fuel Units – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments) for Years 1 through 3, Tables 4-6: Annual Respondent Burden and Cost for New Large Solid Fuel Units – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments) for Years 1 through 3, and Table 7: Summary of Annual Respondent Burden and Cost – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments).

6(e) Bottom Line Burden Hours and Cost Tables

(i) Respondent Tally

The average annual labor hour burden for all respondents, over next 3 years, is 973 hours (per year). Details regarding these estimates may be found in Tables 1-3: Annual Respondent Burden and Cost for Existing Large Solid Fuel Units – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments) for Years 1 through 3, Tables 4-6: Annual Respondent Burden and Cost for New Large Solid Fuel Units – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments) for Years 1 through 3, and Table 7: Summary of Annual Respondent Burden and Cost – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments).

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 public reporting and recordkeeping burden for this collection of information is estimated to average 58 hours per response.

The total of the annualized capital/startup costs and annual O&M costs to the regulated entity are \$540,000, beginning in the third year of this ICR. 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 the next three years is estimated to be 261 labor hours per year at an average annual cost of \$12,600. Details regarding these estimates may be found in Tables 8 through 10 of Attachment 1: Average Annual EPA Burden and Cost – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments) for Years 1 through 3 and Table 11 - Summary of Annual Agency Burden and Cost - NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments).

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 increase in the labor hours, number of respondents, capital costs, and annual O&M costs in this ICR as compared to the previous ICR. This increase is a result of additional monitoring and control devices anticipated to be installed to comply with the more stringent emission limits in the proposed amendments. This burden will mostly occur in year three, but a small amount of burden to familiarize with these regulatory changes is estimated to occur in year one.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 58 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 not conduct or 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-OAR-2002-0058. 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), EPA 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) 566-1927. 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-OAR-2002-0058 and OMB Control Number 2060-0551 in any correspondence.

Part B of the Supporting Statement

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

ATTACHMENT 1

TABLES 1, 2, 3, 4, 5, 6, and 7

- Tables 1 - 3: Annual Respondent Burden and Cost for Existing Large Solid Fuel Units – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments) - Years 1-3
- Tables 4 - 6: Annual Respondent Burden and Cost for New Large Solid Fuel Units – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments) - Years 1-3
- Table 7: Summary of Annual Respondent Burden and Cost – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments)

TABLES 8, 9, 10, and 11

- Tables 8 - 10: Average Annual EPA Burden and Cost – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments) - Years 1-3
- Table 11: Summary of Annual Agency Burden and Cost - NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) (Amendments)