

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (Renewal), EPA ICR Number 2369.05, OMB Control Number 2060-0658.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) were proposed on October 14, 2010, and promulgated on March 21, 2011. These regulations apply to new facilities with one or more sewage sludge incineration (SSI) units. New facilities are those that commenced construction after October 14, 2010 or commenced modification after September 21, 2011. Physical or operational changes made to the SSI unit to comply with the SSI Emission Guidelines at 40 CFR Part 60, Subpart MMMM do not qualify as a modification under this NSPS. This information is being collected to assure compliance with 40 CFR Part 60, Subpart LLLL.

In general, all NSPS 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 NSPS.

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 Protection Agency (EPA) regional office.

There are approximately 8 SSI facilities subject to the regulation, which are owned and operated by municipalities and local government (aka: the "Affected Public"). We assume that they will all respond to EPA inquiries. The 'burden' to the Affected Public may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (Renewal). The 'burden' to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found at the end of this document in Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (Renewal).

Over the next three years, approximately 7 existing respondents per year will be subject

to these standards. Over the next three-year period, EPA estimates a total of 2 new sources and 1 modified source will become subject to these same standards, for an average of 1 new source per year. The overall average number of respondents is 8 per year. Each SSI facility has an average of 6 incinerator units onsite. These estimates are based on EPA's 2016 SSI Inventory.¹ The number of respondents has been updated from the prior ICR based on the estimated growth rate, as EPA identified no additional changes to industry growth or decline through consultations, public comment, or internal Agency knowledge. The estimated growth rate assumptions have also been retained for the three-year period of this ICR.

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 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years.

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

¹ For further information, see: <https://www.regulations.gov/document?D=EPA-HQ-OAR-2012-0319-0020>

reasonably require.

In the Administrator's judgment, particulate matter (PM), hydrogen chloride (HCl), carbon monoxide (CO), dioxin/furan, mercury (Hg), oxides of nitrogen (NO_x), sulfur dioxide (SO₂), cadmium, lead, and fugitive emissions from sewage sludge incineration units either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart LLLL.

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 these 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 the 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 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 60, Subpart LLLL.

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* (84 FR 19777) on May 6, 2019. 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 the standard, 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 8 respondents will be subject to these standards over the three-year period covered by this ICR. The number of respondents has been updated based on the estimated growth rate from the prior ICR.

Industry trade associations 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 National Association of Clean Water Agencies (NACWA), at (202) 833-2672, and the Water Environment Federation, at (800) 666-0206.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, the Deputy CEO of the NACWA confirmed that our estimates (6 existing sources in the first year and one new source per year) seemed reasonable.²

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.

² In this ICR, we estimate that there will be 6 existing SSI facilities subject to the rule in the first year, 7 existing SSI facilities subject in the second year, and 8 existing SSI facilities subject in the third year, for an average of 7 existing SSI facilities subject to these standards over the three-year period of this ICR. We also assume that one new/modified source will become subject to these same standards each year over the three-year period of this ICR. This yields an average of 8 respondents subject to these standards.

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 these 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 and operators of sewage sludge incineration units. The United States Standard Industrial Classification (SIC) and North American Industry Classification System (NAICS) codes for the respondents affected by the standards are listed in the following table:

Standard (40 CFR Part 60, Subpart LLLL)	SIC Codes	NAICS Codes
Sewage Treatment Facilities	4952	221320
Solid Waste Combustors and Incinerators	4953	562213

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL).

A source must make the following reports:

Notifications	
Notification of intent to construct, including anticipated date of commencement of construction, documentation for siting requirements, and anticipated date of initial startup.	§60.7(a), §60.4915(a)
Notification of actual startup, including maximum design dry sewage sludge burning capacity, anticipated maximum feed rate, petition for site-specific operating limits if applicable, and site-specific monitoring plan.	§60.7(a), §60.4915(b)
Notification of intent to start or stop use of a CMS.	§60.7(a), §60.4915(h)
Notification of performance test.	§60.8(d), §60.4915(h)
Notification to reschedule performance test.	§60.8(d), §60.4915(h)

Reports	
Initial compliance report, no later than 60 days after initial performance test.	§60.7(a), §60.4915(c)
Annual compliance report.	§§60.7(c)-(d), §60.4915(d)
Deviation report if operating limits or emission limits are exceeded.	§§60.7(c), §60.4915(e)
Qualified operator deviation report.	§60.4915(f)
Report of force majeure event occurrences.	§60.8(a), §60.4915(g)

A source must keep the following records:

Recordkeeping	
Maintain all records for five years.	§60.4910
Record calendar date of each record.	§60.7(f), §60.4910(a)
Maintain records of documentation of siting requirements.	§60.4910(b)

Recordkeeping	
Maintain records of site-specific information and incinerator operation procedures and the names of persons who have completed review of this information.	§60.4910(c)(1)
Maintain records of names of persons who have completed the operator training requirements, including documentation of the training and the dates of the training.	§60.4910(c)(2)
Maintain records showing the periods when no qualified operators were accessible for more than 8 hours, but less than two weeks.	§60.4910(c)(3)
Maintain records showing the periods when no qualified operators were accessible for two weeks or more.	§60.4910(c)(4)
Maintain records of control device inspections.	§60.7(f), §60.4910(d)
Maintain records of initial performance tests, annual performance tests, and any subsequent performance tests.	§60.7(f), §60.8(d), §60.4910(e)
Maintain records of all continuous monitoring data; includes continuous emissions monitors, continuous automated sampling systems, and continuous parameter monitors.	§§60.7(b)-(c), §60.7(f), §60.4910(f)
Maintain records of other information for continuous monitoring systems.	§§60.7(b)-(c), §60.7(f), §60.4910(g)
Maintain records of days when a deviation from the operating or emission limits have occurred, including a description of the deviation and a description of the corrective actions taken.	§60.7(b), §60.7(f), §60.4910(h), §§60.4915(e)-(f)
Maintain equipment vendor specifications for the incinerator, emission controls, and monitoring equipment.	§60.7(f), §60.4910(i)
Maintain records of calibration of any monitoring devices.	§60.7(f), §60.4910(j)
Maintain records of monitoring plan and performance evaluations.	§60.7(f), §60.4910(k)
Maintain records of less frequent testing.	§60.4910(l)
Maintain records of use of bypass stack.	§60.4910(m)

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. Section 60.4915(i)(2) requires that sources submit relative accuracy test audit data and performance test data (except opacity data) electronically to EPA's Central Data Exchange (CDX) by using the Electronic Reporting Tool (ERT) (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>) or other compatible electronic spreadsheet. Only data collected using test methods compatible with ERT are subject to this requirement to be submitted

electronically into EPA's WebFIRE database.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for carbon monoxide, perform Method 22 test for opacity, and maintain operating parameters established during performance tests for your wet scrubber, fabric filter, electrostatic precipitator, or activated carbon injection.
Perform initial performance test, Reference Method 1, 3A or 3B, 5, 6 or 6C, 7 or 7E, 10, 10A, or 10B, 19, 22, 23, 26, 26A, 29, 30B, test, 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 collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for 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

The EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

Agency Activities
Attend performance tests
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.

Agency Activities
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 standards and note the operating conditions under which compliance was achieved. 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. The 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

There are no small entities (i.e., small businesses) affected by this regulation. This NSPS does not contain any provisions reserved exclusively for the benefit of small entities. However, the NSPS does contain provisions that reduce the impact on all regulated entities, which would include any small entities. The owner or operator is allowed to conduct performance tests once every three years to show compliance if certain criteria are met. Deviation reports are required only if there is a deviation, otherwise reporting is annual, and operating parameter monitoring is required instead of continuous emissions monitoring systems (CEMS) for all pollutants, except for CO. The Agency considers these to be the minimum requirements needed to ensure compliance.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1, at the end of this document, documents 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 record-keeping and reporting requirements is estimated to be 1,560 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously-approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

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.

(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 regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors 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) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents ^a	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
CEMS/CPMS ^b	\$239,607	1	\$239,607	\$81,160	7	\$599,814
Stack testing ^c	\$64,773	1	\$239,607	\$61,350	2.31	\$149,625
Filing cabinet ^d	\$100	1	\$100			
Total ^e			\$304,000			\$749,000

^a We assume that there are 7 existing SSI facilities with an average of 6 incinerator units. Burden estimates are based on a "per respondent" basis, not a "per unit" basis. We assume that there will be a total of 2 new sources and 1 modified source over the next three-year period, averaging in an estimated growth rate of 1 new respondent per year. The estimate for the number of facilities subject to NSPS Subpart LLLL is based on EPA's 2016 SSI Inventory for the Federal Plan (See Appendix A at <https://beta.regulations.gov/document/EPA-HQ-OAR-2012-0319-0020>) and adjusted to reflect the estimated growth rate.

^b Based on estimated monitoring costs provided in Table 1 from the Supporting Statement for the Standards of Performance for New Stationary Sources: Sewage Sludge Incineration (SSI) Units (Subpart LLLL) from the March 21, 2011 final rule (see <https://beta.regulations.gov/document/EPA-HQ-OAR-2009-0559-0168>). Monitoring costs have been updated from 2008 to 2019 values using the CEPCI CE Index.

^c Total estimated cost for initial stack test, including Method 5 (PM) (\$9,150), Method 9 (opacity) (\$2,464), Method 10 (CO) (\$4,927), Method 26 (HCl) (\$5,631), Method 29 (metals) (\$10,558), Method 23 (CDD/CDF) (\$20,412), Method 7E (NO_x) (\$5,631), Method 6C (SO₂) (\$5,631), and visible emissions testing (\$370) are from "Burden Estimate Tables - Standards of Performance for New Stationary Sources Sewage Sludge Incineration (SSI) Units (Subpart LLLL)" spreadsheet at <https://beta.regulations.gov/document/EPA-HQ-OAR-2009-0559-0168>. Testing costs have been updated to 2019 dollars using the CEPCI CE Index. Existing facilities may test every three years if certain requirements are met, and it is assumed that all facilities would meet the requirements. Thus, on average 2.31 existing sources per year (7 x 0.33 = 2.31) perform annual testing following the initial performance test.

^d Assumed \$100 for purchase of filing cabinet to store copy of rule, records, and report copies.

^e 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 \$304,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$749,000. 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 \$1,050,000.

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 \$15,400.

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 Federal government employees. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (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 7 existing respondents will be subject to these standards. It is estimated that one additional respondent per year will become subject to these same standards due to either new construction or modification. The overall average number of respondents, as shown in the table below, is 8 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 ^a	(B) Number of Existing Respondents ^b	(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	1	6	0	0	7
2	1	7	0	0	8
3	1	8	0	0	9
Average	1	7	0	0	8

^a New respondents include sources with constructed, reconstructed and modified affected facilities. We assume there will be 2 new sources and 1 modified source over the next three years, averaging to an estimated growth

rate of 1 new respondent per year. This industry growth estimate is based on EPA's 2016 SSI Inventory for the Federal Plan (see Appendix A at <https://beta.regulations.gov/document/EPA-HQ-OAR-2012-0319-0020>) and adjusted to reflect the estimated growth rate.

^b Estimates of the number of existing sources are based on the previous ICR (2369.04) and EPA's 2016 SSI Inventory.

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 8.

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

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
Notification of Construction	1	1	0	1
Notification of Start-up	1	1	0	1
Notification of Initial Performance Test	1	1	0	1
Notification of Initial CMS Demonstration	1	1	0	1
Initial Compliance Report	1	1	0	1
Annual Compliance Report ^a	7	1	0	7
Status report for operators that are off-site for more than 2 weeks ^b	0.7	1	0	0.7
Corrective action summary for operators that are off-site for more than 2 weeks ^b	0.7	2	0	1.4
Semiannual Deviation Report ^c	0.7	2	0	1.4
			Total (rounded)	16

^a Facilities may test every three years if certain requirements are met, and it is assumed most facilities would meet the requirements. However, all facilities must submit annual compliance reports.

^b We assume that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year. We further assume this would require only two corrective action summaries.

^c We assume that 10 percent of the existing facilities ($7 * 0.1 = 0.7$) have excess emissions and submit semiannual deviation reports.

The number of Total Annual Responses is 16.

The total annual labor costs are \$75,400. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (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 in Tables 1 and 2 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 1,560 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (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 public reporting and recordkeeping burden for this collection of information is estimated to average 101 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$1,050,000. 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 319 labor hours at a cost of \$15,400; see below in Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (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 increase in burden from the most recently-approved ICR as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The increase in burden from the most recently-approved ICR is due to an increase in the number of respondents subject to the rule. The estimated number of existing respondents has increased from 4 in the previous ICR to 7 in this ICR, with an attendant increase in labor hours. The estimated number of new or modified sources becoming subject to the rule remains at an average of one per year. The “per respondent” costs of annual performance testing and CEMS/CPMS monitoring have increased due to adjusting the monitoring and testing costs from 2008 to 2019 dollars using the CEPCI CE Index. The total stack testing and O&M costs have increased from the previous ICR renewal due to the increase in the number of existing

respondents complying with the requirements of the rule. The labor rates for the respondents in this ICR have been revised to reflect that SSI facilities are owned by government entities and pay their employees wage rates as shown in Office of Personnel Management (OPM) General Schedule.³ Wage rates for both respondents and Agency personnel have been revised to the rates from the Office of Personnel Management (OPM), 2019 General Schedule. The regulations have not changed over the past three years and are not anticipated to change over the next three years.

Several revisions were made to the calculation of respondent burden. The labor burden for facilities to familiarize with regulation requirements was revised from 40 hours per existing source per year to 40 hours for a new source and 4 hours for an existing source. This change more accurately reflects the burden that new and existing sources require to familiarize and re-familiarize with the rule. The ‘Number of Respondents’ that will complete the annual refresher course was revised from 1 to 7 to reflect that this is an annual requirement for operators at existing sources, per 40 CFR 60.4825. While the previous ICR rounded up the number of respondents for the Status Report and Corrective Action Summary to a whole number, this ICR calculates these figures as fractions.

One revision was made to the calculation of Agency burden. The labor burden for the regulatory agency to read and understand rule requirements, estimated at 40 hours for each existing respondent for each year, was removed. Any labor burden required for Agency personnel to either familiarize or re-familiarize themselves with the requirements of a particular regulation are already accounted for in the labor burden assigned for the other line items in the estimate of annual burden and costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 98 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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

³ <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2019/general-schedule/>

use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2013-0321. 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-2013-0321 and OMB Control Number 2060-0658 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (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
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with regulation requirements								
1) New sources ^c	40	1	40	1	40	2	4	\$2,217.84
2) Existing sources ^d	4	1	4	7	28	1.4	3	\$1,552.49
B. Required activities								
1) Initial stack test and report (new sources) ^c	40	1	40	1	40	2	4	\$2,217.84
2) Annual stack test and test report (existing sources) ^{d,e}	40	0.33	13.2	2.3	30	1.5	3	\$1,690.66
3) Operator training and qualification								
a) Establish and teach operator qualification course ^{c, f}	64	1	64	1	64	3	6	\$3,548.54
b) Obtain operator qualification ^{c, f}	72	1	72	1	72	4	7	\$3,992.11
c) Annual refresher course ^d	12	1	12	7	84	4	8	\$4,657.46
d) Initial review of site-specific information	See 3A							
e) Annual review of site-specific information (existing sources) ^d	8	1	8	7	56	3	6	\$3,104.98

4) Establish maximum and minimum operating parameters (new sources) ^c	40	1	40	1	40	2	4	\$2,217.84
5) Continuous parameter monitoring (including CEMS) ^d	11	1	11	7	77	4	8	\$4,269.34
C. Create Information	See 3B							
D. Gather Existing Information	See 3E							
E. Write report								
1) Notification of construction (includes siting analysis) ^c	160	1	160	1	160	8	16	\$8,871.36
2) Notification of start-up (includes monitoring plan) ^c	40	1	40	1	40	2	4	\$2,217.84
3) Notification of initial performance test ^c	2	1	2	1	2	0.1	0.2	\$110.89
4) Notification of initial CMS Demonstration ^c	2	1	2	1	2	0.1	0.2	\$110.89
5) Initial Compliance Report	40	1	40	1	40	2	4	\$2,217.84
6) Annual Compliance Report	40	1	40	7	280	14	28	\$15,524.88
7) Status report for operators that are off-site for more than 2 weeks ^g	8	1	8	0.7	5.6	0.3	0.6	\$310.50
8) Corrective action summary for operators that are off-site for more than 2 weeks ^g	8	2	16	0.7	11.2	0.6	1.1	\$621.00
9) Semiannual Deviation Report ^h	24	2	48	0.7	34	1.7	3.4	\$1,862.99
Subtotal for Reporting Requirements						1,272		\$61,317
4. Recordkeeping Requirements								
A. Familiarize with regulation requirements	See 3A							
B. Plan activities	N/A							
C. Implement activities:	N/A							
D. Develop record system	N/A							
E. Record Information								

1) Records of operating parameters	2	52	104	0	0	0	0	\$0
2) Records of exceedances of the operating parameters ^h	2	1	2	0.7	1.4	0.07	0.14	\$77.62
3) Records of stack tests	2	1	2	7	14	0.7	1.4	\$776.24
4) Records of siting analysis	2	1	2	7	14	0.7	1.4	\$776.24
5) Records of persons who have reviewed operating procedures	2	1	2	7	14	0.7	1.4	\$776.24
6) Records of persons who have completed operator training	2	1	2	7	14	0.7	1.4	\$776.24
7) Records of persons who meet operator qualification criteria	2	1	2	7	14	0.7	1.4	\$776.24
8) Records of monitoring device calibration	2	1	2	7	14	0.7	1.4	\$776.24
9) Records of site-specific documentation	24	1	24	7	168	8.4	17	\$9,314.93
F. Time to train personnel	See 3B							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						291		\$14,050
TOTAL LABOR BURDEN AND COSTS (rounded)ⁱ						1,560		\$75,400
TOTAL CAPITAL AND O&M COSTS (rounded)ⁱ								\$1,050,000
GRAND TOTAL (rounded)ⁱ								\$1,130,000

Assumptions:

^a We assume there are 7 existing facilities with 6 incineration units each. Burden estimates are based on a "per respondent" basis, not a "per unit" basis. We assume that there will be a total of 2 new sources and 1 modified source over the next three-year period, averaging to 1 new respondent per year. Estimates are based on EPA's 2016 SSI Inventory.

^b This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical labor. 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.

^c One-time only costs for new sources.

^d Annual Costs for existing sources. Annual costs are not incurred until the second year of operation.

^e Existing facilities may test every three years if certain requirements are met, and it is assumed that all facilities would meet the requirements. Thus, on average 2.31 existing sources per year ($7 \times 0.33 = 2.31$) perform annual testing following the initial performance test.

^f Costs incurred by a facility regardless of the number of affected units at the plant.

^g We assume that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year. We further assume that this would require only two corrective action summaries.

^h We assume that 10 percent of the facilities would have an exceedance during the year.

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

Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (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
1. Applications	N/A							
2. Required Activities								
A. Observe stack tests ^c	48	1	48	0.5	23.832	1.1916	2.3832	\$1,321.39
B. Excess emissions - Enforcement activities	24	1	24	1	24	1.2	2.4	\$1,330.70
C. Create Information	N/A							
D. Gather Information	N/A							
E. Report Reviews								
1) Review initial notifications ^d	40	2	80	1	80	4	8	\$4,435.68
2) Review initial compliance report	40	1	40	1	40	2	4	\$2,217.84
3) Review annual compliance report	8	1	8	7	56	2.8	5.6	\$3,104.98
4) Review semi-annual excess emission and parameter exceedance report	16	2	32	0.7	22.4	1.12	2.24	\$1,241.99
5) Review status reports and corrective action summary for operators off-site	4	1	4	0.7	2.8	0.14	0.28	\$155.25
F. Prepare annual summary report ^e	4	1	4	7	28	1.4	2.8	\$1,552.49
TOTAL COST (rounded) ^f						319		\$15,400

Assumptions:

- ^a We assume there are 7 existing facilities with 6 incineration units each. Burden estimates are based on a "per respondent" basis, not a "per unit" basis. We assume that there will be a total of 2 new sources and 1 modified source over the next three-year period, averaging to 1 new respondent per year. Estimates are based on EPA's 2016 SSI Inventory.
- ^b This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical labor. 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.
- ^c Assumes EPA personnel attend 15 percent of the stack tests. New facilities do stack testing. Existing facilities may test every three years if certain requirements are met, and it is assumed that all facilities would meet the requirements. $((1 \text{ new facility} + (7 \text{ existing facilities} \times 0.33)) \times 0.15) = 0.5 \text{ tests observed per year}$
- ^d Includes notification of construction, notification of start-up for new units, notification of initial performance test, and notification of initial CMS demonstration.
- ^e We assume four hours per state to write annual summary report.
- ^f Totals rounded to 3 significant figures. Figures may not add exactly due to rounding.