

**SUPPORTING STATEMENT FOR  
OMB CONTROL NO. 2050-0073  
"INFORMATION REQUIREMENTS FOR BOILERS AND INDUSTRIAL  
FURNACES"**

**SHORT CHARACTERIZATION/ABSTRACT**

On February 21, 1991 and August 25, 1992, EPA promulgated regulations at 40 CFR Parts 260, 261, 264, 265, 266, and 270 covering boilers and industrial furnaces (BIFs) burning hazardous waste. Specifically, 40 CFR Part 266, Subpart H establishes standards for the burning of hazardous waste in BIFs. 40 CFR Part 270.22 establishes Part B application information requirements for BIFs burning hazardous waste, and 40 CFR Part 270.66 establishes permit requirements for BIFs. Owners and operators of BIF facilities must comply with these regulations in addition to those regulations applicable to all hazardous waste facilities, as mentioned above.

On September 30, 1999, EPA amended the above regulations with the following provisions:

- Comparable fuel specification: Under 40 CFR Part 261.38, wastes that meet the comparable fuel specification can be excluded from the definition of solid waste. Generators claiming the exclusion must demonstrate that the waste meets the specification by submitting a one-time notice. The notice must claim the exclusion, and demonstrate the development and implementation of a waste sampling and analysis plan that supports the comparable fuel specification.
- Lead recovery furnace exemption: Under 40 CFR Part 266.100(h), lead recovery furnaces that process hazardous waste for the recovery of lead and that are subject to Secondary Lead Smelting National Emissions Standards for Hazardous Air Pollutants Regulations, may apply for a conditional exemption from 40 CFR Part 266 regulations. To claim the exemption, the facility owner or operator must submit a one-time notice identifying each hazardous waste burned and demonstrating that the waste burned has a total concentration of organic compounds (Listed in 40 CFR Part 261, Appendix VIII) of less than 500 ppm by weight.
- Regulation of residues: Under 40 CFR Part 266.112(b)(2)(i), in complying with 40 CFR Part 268.43 F039 nonwastewater levels for polychlorinated dibenzodioxins and polychlorinated dibenzo-furans, analyses must be performed for total hexachlorodibenzodioxins, total hexachlorodibenzofurans, total pentachlorodibenzodioxins, total pentachlorodibenzofurans, total tetrachlorodibenzodioxins, and total tetrachlorodibenzofurans.

On April 8, 2015, EPA eliminated the Comparable Fuel Exclusion because of a vacatur ordered by the U.S. Court of Appeals for the D.C. Circuit Court.

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section**

**of each statute and regulation mandating or authorizing the collection of information.**

Regulations covering BIFs and general hazardous waste facilities are promulgated under authority of Sections 1006, 2002, 3001 through 3007, 3010, and 7004 of RCRA, as amended. And codified in 40 CFR Parts 261, 264, 265, 266, and 270 as described in the table below.

<b>CFR citation (40 CFR Part)</b>	<b>Brief Description of Requirements</b>
261.38	Allows owners and operators to claim the comparable fuel exclusion by submitting a one-time notice.
264.12-17	Requires the owner or operator of a treatment facility to obtain a detailed chemical and physical analysis of a representative sample of the waste that will be received and develop and follow a written waste analysis plan that describes the procedures to be used in obtaining a detailed chemical and physical analysis of the waste. Also requires the owner or operator of a facility to record inspections in an inspection log or summary and maintain copies of personnel training documents and records at the facility.
265.12-17	Same as above for interim status facilities.
264.51-56	Requires owners and operators of hazardous waste facilities to prepare and maintain contingency plans, and to notify State and local authorities and prepare emergency reports whenever an imminent or actual emergency situation occurs.
265.51-56	Same as above for interim status facilities.
264.73-74	Requires owners or operators of TSDFs to maintain a written operating record at the facility.
265.73-74	Same as above for interim status facilities.
264.113	Allows owners and operators to prepare demonstrations in support of certain extensions and allowances during the closure period.
265.113	Same as above for interim status facilities.
264.142-150	Requires owners and operators of TSDFs to maintain a detailed written estimate of the cost of facility closure care until closure of the facility.
265.142-150	Same as above for interim status facilities.
266.100-112	Allows owners and operators of certain BIF units to apply for an exemption from BIF regulations.
270.22	Establishes Part B application information requirements for BIFs burning hazardous waste.
270.66	Establishes permit requirements for BIFs. Owners and operators of BIF facilities must comply with these regulations in addition to those regulations applicable to all hazardous waste facilities.
270.14	Allows owners and operators to petition EPA for relief from submission of information prescribed in Part B on a case-by-case

	basis by demonstrating that such information cannot be provided to the extent required.
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**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

**Foreign Shipment Import Report, Notice of Appropriate Permits, and Notice of Part 264 or 265, and Part 270 Requirements**

EPA uses foreign shipment import reports to determine the quantities and types of hazardous wastes being imported from abroad. Information in the foreign shipment import report also allows EPA to determine whether hazardous wastes will be safely transported and managed.

Generators use notices of appropriate permits to ensure that their waste is being managed by a permitted facility. Owners and operators of a treatment, storage, or disposal facility (TSDFs) must keep the notices in the operating record, and these notices may be reviewed by EPA during facility inspections.

New owners and operators use the notice of Part 264 and Part 270 requirements to improve their understanding of applicable regulations.

**Waste Analysis, Waste Analysis Plan, Inspection Schedule, and Documentation of Compliance**

The waste analysis and waste analysis plan, as well as the inspection schedule and documentation of compliance for ignitable or incompatible wastes, are primarily designed to ensure that a facility is complying with the BIF regulations and can adequately handle incoming waste as demonstrated during the trial burn or compliance testing. Information associated with these requirements is also used to ensure that the incoming waste is really what the generator claims it to be, and to prevent unauthorized releases of pollutants during burning of hazardous waste on-site. Much of the information in the waste analysis plan will also be used to provide a quality assurance check on both the generator and the owners' and operators' facilities.

**Personnel Training**

Both EPA and owners and operators use information in the personnel training records to ensure that personnel acquire the necessary expertise to perform their jobs. During inspections, EPA reviews job descriptions and training documents to determine whether each person is receiving a level of training that is commensurate with the person's duties and responsibilities as well as the ability to respond to any emergency situations at the facility.

**Recordkeeping Requirements**

The facility owner or operator uses information included in the operating record and waste disposal location and quantity records to prevent the facility from receiving or placing in proximity wastes that are incompatible or that are likely to ignite or explode. If an unanticipated release of hazardous waste occurs, the owner or operator may review information in the operating record to determine the composition of the

waste. Reviewing information in the operating record facilitates the owner's or operator's selection of an appropriate corrective action and cleanup measure. By providing facility-specific data, the operating record also enables EPA compliance officials to determine whether operating requirements can be better tailored to the needs of a particular site.

### **Contingency Plan and Emergency Procedures**

Local emergency response teams, certain hazardous waste generators, treatment, storage, and disposal facility owners or operators, and EPA use information included in the contingency plan to assure an appropriate response to any unplanned release of hazardous waste or hazardous waste constituents. EPA reviews information in the contingency plan and emergency report to determine whether additional site-specific emergency provisions are necessary.

### **Closure Requirements**

EPA uses information contained in closure plans to determine whether an owner or operator's planned closure activities will comply with environmental regulations. EPA officials use information contained in closure certifications to ensure that the owner or operator closed his/her facility according to the specifications outlined in the approved closure plan. EPA uses information contained in demonstrations to ensure that any activities taking place during the closure period are protective of human health and the environment.

### **Financial Requirements**

The closure care and liability coverage financial instruments submitted by the owner or operator are reviewed by EPA to determine compliance with the applicable Subpart H regulations. This review involves determinations of the validity of the instrument, acceptability of the financial assurance provider, adequacy of the instrument amount, and fulfillment of the other regulatory requirements. The information is also used to direct funds for closure care and liability coverage in the event of default or bankruptcy of a facility owner or operator.

### **Conditions Applicable to All Permits**

EPA uses data collected from permitted facilities to evaluate compliance with the terms of the permit and to decide whether cause exists for modifying, revoking and reissuing, or terminating the permit. By collecting this information, EPA ensures that permitted facilities are operating in a manner protective of human health and the environment.

### **Exemptions from the BIF Regulations**

EPA uses information collected under 40 CFR Parts 266.100 and 266.108 to determine whether a facility complies with the conditions that allow an exemption from BIF regulations.

### **Permit Standards**

EPA uses monitoring and inspection information to ensure that a facility is complying with all the terms of its permit and all applicable standards and conditions, including standards covering the control of organic emissions (40 CFR Part 266.104), particulate matter (40 CFR Part 266.105), metals emissions (40 CFR Part 266.106), HCl and Cl<sub>2</sub> gas emissions (40 CFR Part 266.107).

### **Standards to Control Organic Emissions**

EPA uses information submitted in support of an alternative POHC designation to evaluate whether the proposed POHC can serve as an effective indicator of combustion efficiency.

### **Standards to Control Metals Emissions**

EPA uses information submitted in support of an alternative implementation approach to evaluate whether the proposed approach can be used effectively and safely.

### **Direct Transfer Requirements**

EPA uses information concerning the direct transfer of waste to evaluate the equipment used and to ensure that waste is being transferred in a manner that minimizes the likelihood of a release.

### **Regulation of Residues**

EPA uses information submitted in support of an exclusion of residue from being classified as a hazardous waste to evaluate whether such an exclusion is warranted. EPA uses information submitted in support of the use of an alternative statistical approach and an approach for the handling of nondetect data points to ensure that the approaches used are supported by valid data and assumptions.

### **General Part B Information Requirements for BIFs**

EPA uses the information requirements in 40 CFR Parts 264 and 270 for owners and operators submitting Part B applications to evaluate compliance with various elements of the regulations. For example, the general facility standards informational requirements provide EPA with information demonstrating compliance with standards regarding the facility's contingency plan, the inspection schedule, and security procedures. EPA uses the financial assurance information requirements to evaluate the facility owner's financial ability to close the facility, to maintain the facility after closure, and to respond to any contingencies. Owners and operators use schedules of compliance to develop a list of activities needed to come into compliance with the applicable regulations. EPA uses performance test plans and documentation of compliance to ensure that design and operating procedures are in accordance with air emissions standards.

### **Specific Part B Information Requirements for BIFs**

#### **Fugitive Emissions**

EPA uses information submitted in support of an alternative means of fugitive emissions control to ensure that the proposed method will perform effectively.

#### **Requirements Relating to the Pre-Trial Burn, Trial Burn, and Post-Trial Burn Periods**

EPA uses information relating to the various permit operating periods to evaluate whether the BIF unit can meet the standards set forth in 40 CFR Part 266, Subpart H. EPA uses information submitted in the trial burn plan to evaluate whether a facility's plans are adequate. EPA uses trial burn results to determine whether a facility can meet applicable standards and to set permit conditions. These requirements contribute to EPA's goal of ensuring that facilities can meet the standards set forth in 40 CFR Part 266, Subpart H.

### **Waivers of the Trial Burn**

EPA uses information submitted in support of a waiver of a trial burn to evaluate whether the proposed waiver should be granted, based on human health and environmental considerations.

### **Alternative HC Limit for Industrial Furnaces with Organic Matter in Raw Materials**

EPA uses information submitted in support of an alternative HC limit to evaluate whether the limit will be protective of human health and the environment.

### **Alternative Metals Implementation Approach**

EPA uses information submitted in support of an alternative implementation approach, as described at 40 CFR Parts 266.103(b), 266.106(f), and appendix IX, section 10, to evaluate whether the proposed approach will work effectively and safely.

### **Automatic Hazardous Waste Feed Cutoff System**

EPA uses information on the automatic hazardous waste feed cutoff system to evaluate whether the system has been installed and is being operated correctly.

### **Direct Transfer Requirements**

EPA uses information collected on direct transfer equipment to evaluate and ensure that the integrity of the equipment and its maintenance and operation minimizes the likelihood of a release.

### **Regulation of Residues**

EPA uses information submitted in support of an exclusion of residue from classification as a hazardous waste to evaluate whether the residue meets the required conditions for exclusion. EPA needs to collect this information to ensure that residue generated during the combustion of hazardous waste in BIFs is managed in a manner protective of human health and the environment.

### **Permit Modifications for BIFs**

#### **Permit Modifications**

EPA uses permit information to evaluate the initial permit applications and any subsequent requests for modifications. The public may also use draft EPA permit and permit modification determinations which incorporate data submitted by facilities to assess hazardous waste management facilities being developed in their communities.

## **Expiration and Continuation of Permits**

EPA uses permit renewal applications to ensure that the terms of the facility permit remain protective of human health and the environment.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The information collected, as described above, can be kept in an electronic format and reports can be submitted to the State and/or Region electronically.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The information collections covered in this ICR are not available from sources other than the respondents. EPA's Office of Solid Waste is the only office within the Agency collecting this information, and no other Federal agency or department collects this information. In addition, the Office of Solid Waste has systematically reorganized its ICR structure to eliminate gaps or duplication.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

In response to concerns regarding the burden placed on facilities that burn small quantities of hazardous waste, EPA has provided for an exemption under Section 3004(q)(2)(B) of RCRA. The Agency has carefully evaluated the risks posed by small quantity burning and concluded that a conditional exemption for small quantity burners should be allowed where hazardous waste combustion poses an insignificant risk. This small quantity burner exemption would therefore reduce the burden placed on small entities.

In addition, EPA expects that in certain cases, respondents of small organizations will be able to complete recordkeeping, reporting, and application requirements in less time than large organizations because the permits will not be as detailed, or they will not be required to conduct as many monitoring activities or submit as many reports, because they have fewer activities requiring monitoring and reporting. However, a parallel does not always exist between the size of an organization and the amount of time needed to maintain records or submit reports. EPA has taken steps to minimize the burdens for all facilities, regardless of the size of the business.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

EPA has carefully considered the burden imposed upon the regulated community by the specific unit and special waste processes and types regulations. Consequently, EPA is confident that those activities required of respondents are necessary, and to the extent possible, minimize the burden imposed. EPA believes strongly that if the minimum requirements specified under the regulations are not met, EPA will be unable to fulfill its Congressional mandate to protect public health and the environment.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This ICR adheres to the guidelines stated in the 1995 Paperwork Reduction Act as amended, OMB's implementing regulations, OMB's Information Collection Request Handbook (EPA, February 1999), and other applicable OMB guidance, except for the records retention period. The BIF regulations require that records be retained until closure of the facility.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation**

**in a specific situation. These circumstances should be explained.**

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the *Federal Register* on March 26, 2020 (85 FR 17056), and provided a 60 day comment period. One comment was received but it was about the upcoming election and not about the ICR.

In compliance with the PRA of 1995, EPA consulted with three companies: Eco Services, Eastman Chemical Co. and Chemical. There were no responses from these consultations.

EPA proposes to collect information only to the extent necessary for the implementation of the promulgated rule and does not intend to collect any information related to trade secrets of the stakeholders. Section 3007(b) of RCRA and 40 CFR Part 2, Subpart B define EPA's general policy on the public disclosure of information, and contain provisions for confidentiality of business information. EPA protects from public disclosure all Confidential Business Information (CBI) obtained under RCRA, and has provided businesses with procedures to claim confidentiality for such CBI. EPA makes extra efforts to protect the confidentiality of this CBI.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No questions of a sensitive nature are included in any of the information collection requirements. This ICR complies with the Privacy Act of 1974 and OMB Circular A-130.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government'.**

The following is a list of Standard Industrial Classification (SIC) codes and corresponding North American Industrial Classification System (NAICS) codes associated with facilities most likely affected by the information requirements covered in this ICR. <b>Industry Sector</b>	<b>SIC Code(s)</b>	<b>NAICS Code(s)</b>
Mining: Nonmetallic Minerals, Except Fuels: Miscellaneous Nonmetallic Minerals, not elsewhere classified	1499	212399
Commercial Printing, Lithographic	2752	323110
All Other Miscellaneous Chemical Product and Preparation Manufacturing	2819, 2899	325998
Plastics Material and Resin Manufacturing	2821	325211
Paints and Allied Products	2851	
All Other Basic Organic Chemical Manufacturing	2869	325199
Petroleum Refineries	2911	32411
Manufacturing: Stone, Clay and Glass Products: Cement, Hydraulic	3241	32731
Manufacturing: Stone, Clay and Glass Products: Concrete Block and Brick	3271	327331
Manufacturing: Stone, Clay and Glass Products: Ready-Mixed Concrete	3273	32732
Manufacturing: Stone, Clay and Glass Products: Minerals, Ground or Treated	3295	21232, 21239
Manufacturing: Stone, Clay and Glass Products: Non-metallic Mineral Products, not elsewhere classified	3299	327999
Plating and Polishing	3471	332813
Industrial Machinery	3599	333999
Electronic Components	3679	334419
Motor Vehicle Parts and Accessories	3714	3363
Local Trucking Without Storage	4212	48411, 56211
Electric Systems	4911	2211
Sewerage Systems	4952	22132
Waste Treatment and Disposal	4953	5622
Petroleum Bulk Stations and Terminals	5171	42271
New and Used Car Dealers	5511	4411
Gasoline Service Stations	5541	4471
General Automotive Repair Shops	7538	811111

In the attached excel file, exhibits 1 – 4 provide a detailed breakdown of the respondent burden hours and cost associated with all of the information collections requirements covered this ICR. These exhibits show the average number of hours required to conduct the information collection activity and the average cost associated with each requirement. Table 2 below summarizes the total respondent burden and costs and provides annual bottom-line burden and costs associated with all information collection requirements applicable to facilities with BIF units.

The estimated burden and cost represents the average burden and cost incurred by a facility with BIF units. In developing these estimates, EPA recognizes that the burden for each facility will vary,

depending on the number, capacity, and complexity of the BIF units at the facility. Consequently, the burden estimates included in this ICR neither supersede existing technical guidance nor constitute new guidance on the frequency or cost of complying with the information collection requirements associated with the BIF regulations.

For purposes of this analysis, EPA estimates an average hourly respondent labor cost of \$170.23 for legal staff, \$121.96 for managerial staff, \$67.86 for technical staff, and \$39.02 for clerical staff. These wage rates are based on salaries, overhead and fringe benefits for the industries listed the table above titled “Respondent NAICS Codes”, according to the Bureau of Labor Statistics labor rates for 2020.

Based on data compiled from the EPA Regions, EPA estimated that, over the three-year period covered by ICR 1361.18, there will be, on average, 36 BIF facilities in operation or in the process of closing.

**Table 1**  
**Number of Facilities with Operating BIFs**

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The annualized burden to is estimated to be 39,758 hours, and 900 responses. The average response burden works out to 44 hours per response. For additional information please see the excel sheet for calculations and a detailed breakdown.

**13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).**

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out**

**information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

Capital costs usually include any produced physical good needed to provide the needed information, such as machinery, computers, and other equipment. Capital costs incurred by respondents in this ICR include the cost to buy a monitor, sampling system, and data acquisition system for respondents required to conduct monitoring and inspections of hazardous waste.

Operation and maintenance (O&M) costs are those costs associated with a paperwork requirement incurred continually over the life of the ICR. They are defined by the PRA as “the recurring dollar amount of costs associated with O&M or purchasing services.” O&M costs covered in this ICR include the following:

- Mailing or long-distance phone call (estimated at \$4.40 per response);
- Photocopying and document storage overhead (estimated at \$.15 per page); and
- Laboratory analysis (varies).

The total annualized capital/start-up cost is \$0 and the O&M is \$2,823,121. For additional information please see the excel sheet for calculations and a detailed breakdown.

**14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

EPA estimates an average hourly Agency labor cost of \$83.84 for legal staff, \$60.32 for managerial staff, \$42.32 for technical staff, and \$25.73 for clerical staff. EPA used the 2020 Federal Pay Schedule salary figures, adjusted by 1.6 for overhead, to estimate annual compensation of Regional legal, managerial, technical, and clerical staff. For purposes of this ICR, EPA assigned Regional staff the following government service levels:

Legal staff	GS-15, Step 1
Managerial staff	GS-13, Step 1
Technical staff	GS-11, Step 1
Clerical staff	GS-06, Step 1

In the attached excel file, exhibits 5 – 7 provide a detailed breakdown of the Agency burden hours and cost associated with all of the information collections requirements covered this ICR. Table 3 below is a summary table of the bottom line Agency burden and cost.

The annual burden to the Agency under the BIF requirements is estimated to be 2,872 hours, at a total cost of \$136,624.

**15. Explain the reasons for any program changes or adjustments reported on the burden worksheet (in hour or cost burden.)**

The previously approved ICR estimated an annual respondent burden of 271,137 hours. This renewal estimates an annual respondent burden of hours, which is a decrease of 231,379 hours. The reason for this decrease is a decrease in the size of the universe, from 105 facilities to 36 facilities. This decrease is due partly to closures of boilers in both permitted and interim status facilities, but is mostly due to a clean up of the data, because previously there had been double-counting of facilities as being both permitted and interim status. The reason for the double-counting was that one facility could have both permitted boilers and non-permitted boilers (i.e., in interim status). Currently, however, there are no boilers in interim status; they are either permitted or they have been closed.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

No collection of information will be published.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

Not seeking to not display the expiration date.

**18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”**

No exception to the topics of the certification statement.



Table 2  
BIF ICR  
TOTAL RESPONDENT BURDEN AND COST

	Labor Costper Year	Capital/ Startup Cost	O & M Cost	Total Hours PerYear	Total Cost PerYear
<b>Exhibit 1</b>					
(A) General Facility Operating Requirements	\$394,512.79	\$0.00	\$224,596.00	5,870.75	\$619,108.79
(B) Recordkeeping Requirements	\$245,842.00	\$0.00	\$240.00	4,536.00	\$246,082.00
(C) Contingency Plan and Emergency Procedures	\$12,834.25	\$0.00	\$84.80	218.00	\$12,919.05
(D) Closure Requirements	\$9,524.16	\$0.00	\$0.00	126.00	\$9,524.16
(E) Financial Requirements	\$43,698.39	\$0.00	\$268.40	655.00	\$43,966.79
(F) Conditions Applicable to All Permits	\$29,146.64	\$0.00	\$325.60	422.50	\$29,472.24
<b>Exhibit 2</b>					
Specific Unit Requirements for BIFs	\$1,800,171.11	\$0.00	\$2,212,086.88	26,129.66	\$4,012,257.99
<b>Exhibit 3</b>					
(A) General Part B Information Requirements	\$0.00	\$0.00	\$0.00	0.00	\$0.00
(B) Specific Part B Information Requirements	\$8,911.16	\$0.00	\$14,800.00	126.00	\$23,711.16
(C) Part B Modification Requirements	\$131,336.55	\$0.00	\$369,938.80	1,673.85	\$501,275.35
<b>Exhibit 4</b>					
Operating and Maintenance Costs for Maintaining All Records	\$0.00	\$0.00	\$780.12	0.00	\$780.12
<b>TOTAL</b>	<b>\$2,675,977.05</b>	<b>\$0.00</b>	<b>\$2,823,120.60</b>	<b>39,757.76</b>	<b>\$5,499,097.65</b>

Table 3  
BIF ICR  
TOTAL AGENCY BURDEN AND COST

	Labor Costper Year	Capital/ Startup Cost	O & M Cost	Total Hours PerYear	Total Cost PerYear
<b>Exhibit 5</b>					
(A) General Facility Operating Requirements	\$10,580.00	varies	varies	250	\$10,580.00
(B) Recordkeeping Requirements	\$2,623.84	varies	varies	62	\$2,623.84
(C) Contingency Plan and Emergency Procedures	\$761.76	\$0.00	\$0.00	18	\$761.76
(D) Closure Requirements	\$0.00	\$0.00	\$0.00	0	\$0.00
(E) Financial Requirements	\$7,173.24	\$0.00	\$0.00	170	\$7,173.24
(F) Conditions Applicable to All Permits	\$9,873.46	\$0.00	\$0.00	234	\$9,873.46
<b>Exhibit 6</b>					
Specific Unit Requirements for BIFs	\$46,923.38	\$0.00	\$0.00	1,076	\$46,923.38
<b>Exhibit 7</b>					
(A) General Part B Information Requirements	\$0.00	\$0.00	\$0.00	0	\$0.00
(B) Specific Part B Information Requirements	\$1,621.24	\$0.00	\$0.00	37	\$1,621.24
(C) Part B Modification Requirements	\$57,067.10	\$0.00	\$0.00	1,026	\$57,067.10
<b>TOTAL</b>	<b>\$136,624.02</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>2,872</b>	<b>\$136,624.02</b>