

Table 1: Annual Respondent Burden and Cost – Emission Guidelines for Other Solid Waste Incine

Burden item	(A) Person hours per occurrence	(B) Non-Labor Costs Per Occurrence	(C) No. of occurrences per respondent per year
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarize with rule requirements ^c	18	\$0	1
B. Required activities			
1) Initial performance test and reports			
a) Initial performance tests (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg) ^c	24	\$57,333	1
b) Repeat of initial performance tests ^{c,d}	24	\$11,467	1
c) Initial performance tests - Air Curtain Incinerators (opacity) ^c	3	\$3,000	1
d) Repeat of initial performance tests - Air Curtain Incinerators ^{c,d}	3	\$600	1
2) CEMS demonstration (CO, O2)			
a) Initial demonstration ^e	229	\$351,000	1
b) Annual Costs	See 3.B.5		
3) Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg) ^f	24	\$0	1
4) Annual performance tests and test reports - Air Curtain Incinerators (opacity) ^f	3	\$0	1
5) Quarterly Appendix F audits of CEMS (CO)			
a) RATA audit (one per year) ^{e,f}	4	1	4
b) RAA audit (three per year) ^{e,f}	4	3	12
c) Daily calibration and operation ^{e,f}	0.25	\$64,600	250
6) Waste management plan ^c	20	\$0	1
C. Create information	See 3B		
D. Gather existing information	See 3E		
E. Write Report			
1) Preconstruction report ^c	8	\$0	1
2) Startup notification ^c	2	\$0	1
3) Initial test report ^c			
a) Initial test report (non-ACI) ^c	40	\$0	1
b) Initial test report (ACI) ^c	10	\$0	1
4) Annual compliance reports			
a) Annual compliance report (non-ACI) ^g	28	\$0	1
b) Annual compliance report (ACI) ^g	10	\$0	1
5) Semiannual deviation reports ⁱ	24	\$0	2
6) Notification of final compliance	1	\$0	1
Subtotal for Reporting Requirements			

4. Recordkeeping requirements			
A. Familiarize with rule requirements ^c	See 3A		
B. Plan activities	See 3B		
C. Implement activities	See 3B		
D. Develop record system	N/A		
E. Record information			
1) Records of SSM ^h	1.5	\$0	52
2) Records of emission rate computations, all emission exceedances and periods when there is no data ^{i,k}	1.5	\$0	52
3) Records of employee review of operations manual	4	\$0	1
4) Record of control devices operating parameters ^{k,f}	1.5	\$25,900	52
5) Records of waste characterization ^k	0.5	\$0	52
F. Perform Audits	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL (rounded)^j			

Assumptions:

^a EPA estimates that there are 155 existing facilities subject to 40 CFR 60, Subpart FFFF: 29 air curtain incinerator (ACI) units with capacities that are less than 10 TPD that will be able to do initial testing, and the ACI facilities will be able to do initial compliance option that allows facilities to demonstrate compliance by requesting a substitute means of compliance demonstration. Non-ACI units will have no new initial testing requirements under the proposed rule, therefore, there are no incremental costs associated with initial testing.

^b This ICR uses the following labor rates: \$117.92 (technical), \$147.40 (managerial), and \$57.02 (clerical). These rates are based on the occupational and industry group. The rates are from column 1, "Total compensation." They have been increased by 10 percent to account for inflation.

^c We have assumed that this is a one-time only cost for existing respondents with units greater than 10 TPD or units less than 10 TPD. Facilities will test 78 units, and 63 remaining facilities will use the substitute means of compliance option in Year 1. No new testing requirements under the proposed rule for units with capacities greater than 10 TPD or ACI units, therefore, there are no incremental costs associated with testing.

^d We have assumed that no respondents would be required to repeat a performance test.

^e We have assumed that none of the existing units subject to FFFF have CEMS, all units are less than 10 TPD and will not have CEMS.

^f We have assumed that each respondent will use a substitute means of compliance demonstration; therefore, no respondents will have to report operating parameters.

^g We have assumed that non-ACI facilities will submit an initial test report in lieu of an annual compliance report in Year 1. There are no costs associated with this requirement.

^h The emission limits will apply at all times, including periods of SSM. Therefore, no facilities will have recordkeeping requirements during SSM.

ⁱ We have assumed that 10 percent of the respondents will report exceedances.

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

^k We have assumed that each respondent will record information 52 times per year. This includes 63 respondents with units less than 10 TPD.

ation Units (40 CFR Part 60, Subpart FFFF) - Year 1 Incremental Burden

117.92 147.4

57.02

		Person-hours per year				
(D) Person hours per respondent per year (C=AxB)	(E) Respondents per year ^a	(F) Technical person- hours per year (E=CxD)	(G) Management person hours per year (Ex0.05)	(H) Clerical person hours per year (Ex0.1)	(I) Total Hours per Year (F + G + H)	(J) Total Labor Cost per year ^b
18	155	2790	139.5	279	3208.5	\$365,467.68
24	63	1512	75.6	151.2	1738.8	\$198,059.90
24	0	0	0	0	0	\$0
3	0	0	0	0	0	\$0
3	0	0	0	0	0	\$0
229	0	0	0	0	0	\$0
24	0	0	0	0	0	\$0
3	0	0	0	0	0	\$0
16	0	0	0	0	0	\$0
48	0	0	0	0	0	\$0
62.5	0	0	0	0	0	\$0
20	0	0	0	0	0	\$0
8	0	0	0	0	0	\$0
2	0	0	0	0	0	\$0
40	63	2520	126	252	2898	\$330,099.84
10	0	0	0	0	0	\$0
28	0	0	0	0	0	\$0
10	0	0	0	0	0	\$0
48	0	0	0	0	0	\$0
1	126	126	6.3	12.6	144.9	\$16,504.99
		6,948	347	695	7,990	\$910,132

78	0	0	0	0	0	\$0
78	0	0	0	0	0	\$0
4	0	0	0	0	0	\$0
78	0	0	0	0	0	\$0
26	63	1638	81.9	163.8	1883.7	\$214,565
		1,638	82	164	1,884	\$214,565
		8,586	429	859	9,874	\$1,120,000

CI) facilities and 126 other OSWI facilities. EPA estimates that 63 non-ACI facilities are large facilities with units with initial testing. For the remaining 63 units with a capacity of less than 10 TPD, the proposed rule allows for an alternative demonstration test from their delegated authority. Units with a capacity of greater than or equal to 10 TPD and ACI units with these requirements.

These data are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian workers, by industry, 2017." 110 percent to account for the benefit packages available to those employed by private industry.

Units with a capacity less than 10 TPD that do not meet the substitute means of compliance requirements. We assume 63 respondents at large facilities that the waste management plan is submitted as part of the preconstruction report. There are no new initial testing or incremental costs associated with these requirements.

Facilities that use a substitute means of compliance demonstration; therefore no facilities will submit an initial demonstration report. Respondents are expected to conduct annual performance tests or record daily calibration and operation or control devices

Year 1. However, the requirement to submit an annual compliance report is not new, therefore there are no incremental

initial testing costs associated with SSM.

Units with capacities less than 10 TPD that will use the substitute means of compliance option.

\$0	0
\$0	0
\$0	0
\$0	0
\$0	3276
\$0	3,276
\$4,470,000	\$3,680

Table 2: Annual Respondent Burden and Cost – Emission Guidelines for Other Solid Waste Incine

Burden item	(A) Person hours per occurrence	(B) Non-Labor Costs Per Occurrence	(C) No. of occurrences per respondent per year
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarize with rule requirements ^c	18	\$0	1
B. Required activities			
1) Initial performance test and reports			
a) Initial performance tests (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg) ^c	24	\$57,333	1
b) Repeat of initial performance tests ^{c,d}	24	\$11,467	1
c) Initial performance tests - Air Curtain Incinerators (opacity) ^c	3	\$3,000	1
d) Repeat of initial performance tests - Air Curtain Incinerators ^{c,d}	3	\$600	1
2) CEMS demonstration (CO, O2)			
a) Initial demonstration ^e	229	\$351,000	1
b) Annual Costs	See 3.B.5		
3) Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg) ^f	24	\$57,333	1
4) Annual performance tests and test reports - Air Curtain Incinerators (opacity) ^f	3	\$3,000	1
5) Quarterly Appendix F audits of CEMS (CO)			
a) RATA audit (one per year) ^{e,f}	4	1	4
b) RAA audit (three per year) ^{e,f}	4	3	12
c) Daily calibration and operation ^{e,f}	0.25	\$64,600	250
6) Waste management plan ^c	20	\$0	1
C. Create information	See 3B		
D. Gather existing information	See 3E		
E. Write Report			
1) Preconstruction report ^c	8	\$0	1
2) Startup notification ^c	2	\$0	1
3) Initial test report ^c			
a) Initial test report (non-ACI) ^c	40	\$0	1
b) Initial test report (ACI) ^c	10	\$0	1
4) Annual compliance reports			
a) Annual compliance report (non-ACI) ^g	28	\$0	1
b) Annual compliance report (ACI) ^g	10	\$0	1
5) Semiannual deviation reports ⁱ	24	\$0	2
6) Notification of final compliance	1	\$0	1

Subtotal for Reporting Requirements			
4. Recordkeeping requirements			
A. Familiarize with rule requirements ^c	See 3A		
B. Plan activities	See 3B		
C. Implement activities	See 3B		
D. Develop record system	N/A		
E. Record information			
1) Records of SSM ^h	1.5	\$0	52
2) Records of emission rate computations, all emission exceedances and periods when there is no data ^{i,k}	1.5	\$0	52
3) Records of employee review of operations manual	4	\$0	1
4) Record of control devices operating parameters ^{k,f}	1.5	\$1,800	52
5) Records of waste characterization ^k	0.5	\$0	52
F. Perform Audits	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL (rounded)^h			

Assumptions:

^a EPA estimates that there are 155 existing facilities subject to 40 CFR 60, Subpart FFFF: 29 air curtain incinerator (ACI) capacities that are less than 10 TPD that will be able to do initial testing, and the ACI facilities will be able to do initial compliance option that allows facilities to demonstrate compliance by requesting a substitute means of compliance. There will be no new initial testing requirements under the proposed rule, therefore, there are no incremental costs associated with

^b This ICR uses the following labor rates: \$117.92 (technical), \$147.40 (managerial), and \$57.02 (clerical). These rates are occupational and industry group.” The rates are from column 1, “Total compensation.” They have been increased by

^c We have assumed that this is a one-time only cost for existing respondents with units greater than 10 TPD or units less than 10 TPD that will test, and 63 remaining facilities will use the substitute means of compliance option in Year 1. Note that this is not the case under the proposed rule for large units or ACI units, therefore, there are no incremental costs associated with these requirements.

^d We have assumed that no respondents would be required to repeat a performance test.

^e We have assumed that none of the existing units subject to FFFF have CEMS, all units are less than 10 TPD and will

^f We have assumed that each respondent will use a substitute means of compliance demonstration; therefore, no respondents will be required to submit operating parameters.

^g The requirement to submit an annual compliance report is not new, therefore there are no incremental costs associated with this requirement.

^h The emission limits will apply at all times, including periods of SSM. Therefore, no facilities will have recordkeeping requirements during SSM.

ⁱ We have assumed that 10 percent of the respondents will report exceedances.

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

^k We have assumed that each respondent will record information 52 times per year. This includes 63 respondents with

ration Units (40 CFR Part 60, Subpart FFFF) - Year 2 Incremental Burden

117.92

147.4

57.02

		Person-hours per year				
(D) Person hours per respondent per year (C=AxB)	(E) Respondents per year ^a	(F) Technical person- hours per year (E=CxD)	(G) Management person hours per year (Ex0.05)	(H) Clerical person hours per year (Ex0.1)	(I) Total Hours per Year (F + G + H)	(J) Total Labor Cost per year ^b
18	0	0	0	0	0	\$0
24	0	0	0	0	0	\$0
24	0	0	0	0	0	\$0
3	0	0	0	0	0	\$0
3	0	0	0	0	0	\$0
229	0	0	0	0	0	\$0
24	0	0	0	0	0	\$0
3	0	0	0	0	0	\$0.00
16	0	0	0	0	0	\$0
48	0	0	0	0	0	\$0
62.5	0	0	0	0	0	\$0
20	0	0	0	0	0	\$0
8	0	0	0	0	0	\$0
2	0	0	0	0	0	\$0
40	0	0	0	0	0	\$0
10	0	0	0	0	0	\$0
28	0	0	0	0	0	\$0.00
10	0	0	0	0	0	\$0.00
48	0	0	0	0	0	\$0.00
1	0	0	0	0	0	\$0.00

		<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>\$0</i>
78	0	0	0	0	0	\$0
78	0	0	0	0	0	\$0.00
4	0	0	0	0	0	\$0.00
78	0	0	0	0	0	\$0
26	126	3276	163.8	327.6	3767.4	\$429,130
		3,276	164	328	3,767	\$429,130
		3,276	164	328	3,767	\$430,000

CI) facilities and 126 other OSWI facilities. EPA estimates that 63 non-ACI facilities are large facilities with units with 1 testing. For the remaining 63 units with a capacity of less than 10 TPD, the proposed rule allows for an alternative nonstration test from their delegated authority. Units with a capacity of greater than or equal to 10 TPD and ACI units with these requirements.

s are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian workers, by 110 percent to account for the benefit packages available to those employed by private industry.

ss than 10 TPD that do not meet the substitute means of compliance requirements. We assume 63 respondents at large he waste management plan is submitted as part of the preconstruction report. There are no new testing requirements uirements.

use a substitute means of compliance demonstration; therefore no facilities will submit an initial demonstration report.

idents are expected to conduct annual performance tests or record daily calibration and operation or control devices

ed with this requirement.

g costs associated with SSM.

units with capacities less than 10 TPD that will use the substitute means of compliance option.

\$0	0
\$0	0
\$0	0
\$0	0
\$0	0
\$0	6552
\$0	6,552
\$0	13,104

Table 3: Annual Respondent Burden and Cost – Emission Guidelines for Other Solid Waste Inciner

Burden item	(A) Person hours per occurrence	(B) Non-Labor Costs Per Occurrence	(C) No. of occurrences per respondent per year
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarize with rule requirements ^c	18	\$0	1
B. Required activities			
1) Initial performance test and reports			
a) Initial performance tests (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg) ^c	24	\$57,333	1
b) Repeat of initial performance tests ^{c,d}	24	\$11,467	1
c) Initial performance tests - Air Curtain Incinerators (opacity) ^c	3	\$3,000	1
d) Repeat of initial performance tests - Air Curtain Incinerators ^{c,d}	3	\$600	1
2) CEMS demonstration (CO, O2)			
a) Initial demonstration ^e	229	\$351,000	1
b) Annual Costs	See 3.B.5		
3) Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg) ^f	24	\$57,333	1
4) Annual performance tests and test reports - Air Curtain Incinerators (opacity) ^f	3	\$3,000	1
5) Quarterly Appendix F audits of CEMS (CO)			
a) RATA audit (one per year) ^{e,f}	4	1	4
b) RAA audit (three per year) ^{e,f}	4	3	12
c) Daily calibration and operation ^{e,f}	0.25	\$64,600	250
6) Waste management plan ^c	20	\$0	1
C. Create information	See 3B		
D. Gather existing information	See 3E		
E. Write Report			
1) Preconstruction report ^c	8	\$0	1
2) Startup notification ^c	2	\$0	1
3) Initial test report ^c			
a) Initial test report (non-ACI) ^c	40	\$0	1
b) Initial test report (ACI) ^c	10	\$0	1
4) Annual compliance reports			
a) Annual compliance report (non-ACI) ^g	28	\$0	1
b) Annual compliance report (ACI) ^g	10	\$0	1
5) Semiannual deviation reports ⁱ	24	\$0	2
6) Notification of final compliance	1	\$0	1
Subtotal for Reporting Requirements			

4. Recordkeeping requirements			
A. Familiarize with rule requirements ^c	See 3A		
B. Plan activities	See 3B		
C. Implement activities	See 3B		
D. Develop record system	N/A		
E. Record information			
1) Records of SSM ^h	1.5	\$0	52
2) Records of emission rate computations, all emission exceedances and periods when there is no data ^{i,k}	1.5	\$0	52
3) Records of employee review of operations manual	4	\$0	1
4) Record of control devices operating parameters ^{k,f}	1.5	\$1,800	52
5) Records of waste characterization ^k	0.5	\$0	52
F. Perform Audits	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL (rounded)^h			

Assumptions:

^a EPA estimates that there are 155 existing facilities subject to 40 CFR 60, Subpart FFFF: 29 air curtain incinerator (ACI) capacities that are less than 10 TPD that will be able to do initial testing, and the ACI facilities will be able to do initial compliance option that allows facilities to demonstrate compliance by requesting a substitute means of compliance demonstration. Therefore, there are no new initial testing requirements under the proposed rule, therefore, there are no incremental costs associated with these requirements.

^b This ICR uses the following labor rates: \$117.92 (technical), \$147.40 (managerial), and \$57.02 (clerical). These rates are from column 1, "Total compensation." They have been increased by 10 percent to account for inflation.

^c We have assumed that this is a one-time only cost for existing respondents with units greater than 10 TPD or units less than 10 TPD that will test, and 63 remaining facilities will use the substitute means of compliance option in Year 1. Note that the proposed rule for large units or ACI units, therefore, there are no incremental costs associated with these requirements.

^d We have assumed that no respondents would be required to repeat a performance test.

^e We have assumed that none of the existing units subject to FFFF have CEMS, all units are less than 10 TPD and will use the substitute means of compliance demonstration, therefore, no respondents will be required to install CEMS or report operating parameters.

^g The requirement to submit an annual compliance report is not new, therefore there are no incremental costs associated with this requirement.

^h The emission limits will apply at all times, including periods of SSM. Therefore, no facilities will have recordkeeping requirements during SSM.

ⁱ We have assumed that 10 percent of the respondents will report exceedances.

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

^k We have assumed that each respondent will record information 52 times per year. This includes 63 respondents with units less than 10 TPD that will be able to do initial testing, and the ACI facilities will be able to do initial compliance option that allows facilities to demonstrate compliance by requesting a substitute means of compliance demonstration.

ation Units (40 CFR Part 60, Subpart FFFF) - Year 3 Incremental Burden

117.92

147.4

57.02

(D) Person hours per respondent per year (C=AxB)	(E) Respondents per year ^a	Person-hours per year			(I) Total Hours per Year (F + G + H)	(J) Total Labor Cost per year ^b
		(F) Technical person- hours per year (E=CxD)	(G) Management person hours per year (Ex0.05)	(H) Clerical person hours per year (Ex0.1)		
18	0	0	0	0	0	\$0
24	0	0	0	0	0	\$0
24	0	0	0	0	0	\$0
3	0	0	0	0	0	\$0
3	0	0	0	0	0	\$0
229	0	0	0	0	0	\$0
24	0	0	0	0	0	\$0
3	0	0	0	0	0	\$0.00
16	0	0	0	0	0	\$0
48	0	0	0	0	0	\$0
62.5	0	0	0	0	0	\$0
20	0	0	0	0	0	\$0
8	0	0	0	0	0	\$0
2	0	0	0	0	0	\$0
40	0	0	0	0	0	\$0
10	0	0	0	0	0	\$0
28	0	0	0	0	0	\$0.00
10	0	0	0	0	0	\$0.00
48	0	0	0	0	0	\$0.00
1	0	0	0	0	0	\$0.00
		0	0	0	0	\$0

78	0	0	0	0	0	\$0
78	0	0	0	0	0	\$0.00
4	0	0	0	0	0	\$0.00
78	0	0	0	0	0	\$0
26	126	3276	163.8	327.6	3767.4	\$429,130
		3,276	164	328	3,767	\$429,130
		3,276	164	328	3,767	\$430,000

CI) facilities and 126 other OSWI facilities. EPA estimates that 63 non-ACI facilities are large facilities with units with testing. For the remaining 63 units with a capacity of less than 10 TPD, the proposed rule allows for an alternative demonstration test from their delegated authority. Units with a capacity of greater than or equal to 10 TPD and ACI units with these requirements.

are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian workers, by 10 percent to account for the benefit packages available to those employed by private industry.

ss than 10 TPD that do not meet the substitute means of compliance requirements. We assume 63 respondents at large e waste management plan is submitted as part of the preconstruction report. There are no new testing requirements under nts.

use a substitute means of compliance demonstration; therefore no facilities will submit an initial demonstration report. ~~units are expected to conduct annual performance tests of record daily calibration and operation of control devices~~

d with this requirement.

g costs associated with SSM.

units with capacities less than 10 TPD that will use the substitute means of compliance option.

\$0	0
\$0	0
\$0	0
\$0	0
\$0	0
\$0	6552
\$0	6,552
\$0	13,104

Table 4 - Summary of Incremental Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements

Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Costs	Non-Labor (Capital/Startup and O&M) Costs
1	8,586	859	429	9,874	\$1,120,000	\$4,470,000
2	3,276	328	164	3,767	\$430,000	\$0
3	3,276	328	164	3,767	\$430,000	\$0
Total	15,138	1,514	757	17,409	\$1,980,000	\$4,470,000
Average	5,046	505	252	5,803	\$660,000	\$1,490,000

Year	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours	Hours per Response
1	126	189	7,990	1,884	9,874	52
2	126	0	0	3,767	3,767	0
3	126	0	0	3,767	3,767	0
Total	126	189	7,990	9,419	17,409	92
Average	126	63	2,663	3,140	5,803	92

ments - Emission Guidelines for Other Solid Waste Incineration Units (40 CFR Part 60, Subpart FFFF)

Total Costs
\$5,590,000
\$430,000
\$430,000
\$6,450,000
\$2,150,000
Hours Per Respondent
78
30
30
138
46

Table 5: Average Annual EPA Burden and Cost – Emission Guidelines for Existing Other Solid V

Activity	(A)	(B)	(C)	(D)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year ^a
1. Applications	N/A			
2. Familiarization with rule requirements	N/A			
3. Required activities				
A. Create information	N/A			
B. Gather information	See 3A			
C. Report reviews				
1) Notification of final compliance ^c	1.5	1	1.5	126
2) Review initial compliance test report				
a) Initial test report (non-ACI) ^c	40	1	40	63
b) Initial test report (ACI) ^c	10	1	10	0
3) Review annual compliance report				
a) Annual compliance report (non-ACI)	40	1	40	0
b) Annual compliance report (ACI)	10	1	10	0
4) Review semiannual deviation reports	16	2	32	0
5) Review waste management plan ^c	16	1	16	0
6) Review grant applications for initial testing ^f	20	1	20	10
D. Annual summary report ^d	4	1	4	0
TOTAL ANNUAL BURDEN AND COST (rounded)^e				

Assumptions:

^a EPA estimates that there are 155 existing facilities subject to 40 CFR 60, Subpart FFFF: 29 air curtain incinerator (ACI) facilities with units with capacities that are less than 10 TPD that will be able to do initial testing, and the ACI facilities will be able to do initial testing if the proposed rule allows for an alternative compliance option that allows facilities to demonstrate compliance by requesting a sulfur capacity of greater than or equal to 10 TPD and ACI units have no new initial testing requirements under the proposed rule, but they will not be able to do initial testing if the proposed rule does not allow for this alternative compliance option.

^b This ICR uses the following labor rates: \$48.08 (technical), \$64.80 (managerial), and \$26.02 (clerical). These rates are from the 2014 EPA Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit package.

^c We have assumed that this is a one-time only cost for existing respondents with units greater than 10 TPD or units less than 10 TPD that are not ACI units. We assume 63 non-ACI respondents will test in Year 1.

^d We have assumed that all affected facilities in the states will be required to prepare an annual summary plan.

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

^fWe have assumed that EPA will review one grant application per EPA Region.

Waste Incineration Units (40 CFR Part 60, Subpart FFFF) - Year 1 Incremental Burden

	48.08	64.8	26.02
(E)	(F)	(G)	(H)
Technical person- hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
189	9.45	18.9	\$10,191
2520	126	252	\$135,883
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
200	10	20	\$10,784.40
0	0	0	\$0
2,909	145	291	\$157,000

ilities and 126 other OSWI facilities. EPA estimates that 63 non-ACI facilities are large be able to do initial testing. For the remaining 63 units with a capacity of less than 10 TPD, the bstitute means of compliance demonstration test from their delegated authority. Units with a herefore, there are no incremental costs associated with these requirements.

m the Office of Personnel Management (OPM), 2017 General ges available to government employees.

10 TPD that do not meet the substitute means of compliance

Table 6: Average Annual EPA Burden and Cost – Emission Guidelines for Existing

Activity	(A)	(B)	(C)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)
1. Applications	N/A		
2. Familiarization with rule requirements	N/A		
3. Required activities			
A. Create information	N/A		
B. Gather information	See 3A		
C. Report reviews			
1) Notification of final compliance ^c	1.5	1	1.5
2) Review initial compliance test report			
a) Initial test report (non-ACI) ^c	40	1	40
b) Initial test report (ACI) ^c	10	1	10
3) Review annual compliance report			
a) Annual compliance report (non-ACI)	40	1	40
b) Annual compliance report (ACI)	10	1	10
4) Review semiannual deviation reports	16	2	32
5) Review waste management plan ^c	16	1	16
6) Review grant applications for initial testing ^f	20	1	20
D. Annual summary report ^d	4	1	4
TOTAL ANNUAL BURDEN AND COST (rounded)^e			

Assumptions:

^a EPA estimates that there are 155 existing facilities subject to 40 CFR 60, Subpart FFFF: 29 air curtain incinerators with units with capacities that are less than 10 TPD that will be able to do initial testing, and the ACP proposed rule allows for an alternative compliance option that allows facilities to demonstrate compliance by capacity of greater than or equal to 10 TPD and ACI units have no new initial testing requirements under the rule.

^b This ICR uses the following labor rates: \$48.08 (technical), \$64.80 (managerial), and \$26.02 (clerical). Title 40 CFR Part 101, Appendix A, Table 1, Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for inflation.

^c We have assumed that this is a one-time only cost for existing respondents with units greater than 10 TPD requirements. We assume 63 non-ACI respondents will test in Year 1.

^d We have assumed that all affected facilities in the states will be required to prepare an annual summary plan.

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

^fWe have assumed that EPA will review one grant application per EPA Region.

ital Burden

Table 7: Average Annual EPA Burden and Cost – Emission Guidelines for Existing

Activity	(A)	(B)	(C)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)
1. Applications	N/A		
2. Familiarization with rule requirements	N/A		
3. Required activities			
A. Create information	N/A		
B. Gather information	See 3A		
C. Report reviews			
1) Notification of final compliance ^c	1.5	1	1.5
2) Review initial compliance test report			
a) Initial test report (non-ACI) ^c	40	1	40
b) Initial test report (ACI) ^c	10	1	10
3) Review annual compliance report			
a) Annual compliance report (non-ACI)	40	1	40
b) Annual compliance report (ACI)	10	1	10
4) Review semiannual deviation reports	16	2	32
5) Review waste management plan ^c	16	1	16
6) Review grant applications for initial testing ^f	20	1	20
D. Annual summary report ^d	4	1	4
TOTAL ANNUAL BURDEN AND COST (rounded)^e			

Assumptions:

^a EPA estimates that there are 155 existing facilities subject to 40 CFR 60, Subpart FFFF: 29 air curtain incinerators with units with capacities that are less than 10 TPD that will be able to do initial testing, and the A proposed rule allows for an alternative compliance option that allows facilities to demonstrate compliance by capacity of greater than or equal to 10 TPD and ACI units have no new initial testing requirements under the

^b This ICR uses the following labor rates: \$48.08 (technical), \$64.80 (managerial), and \$26.02 (clerical). T1 Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for t

^c We have assumed that this is a one-time only cost for existing respondents with units greater than 10 TPD requirements. We assume 63 non-ACI respondents will test in Year 1.

^d We have assumed that all affected facilities in the states will be required to prepare an annual summary pla

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

^fWe have assumed that EPA will review one grant application per EPA Region.

Other Solid Waste Incineration Units (40 CFR Part 60, Subpart FFFF) - Year 3 Increment

	48.08	64.8	26.02	
(D)	(E)	(F)	(G)	(H)
Plants per year ^a	Technical person- hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
	0	0	0	\$0

erator (ACI) facilities and 126 other OSWI facilities. EPA estimates that 63 non-ACI facilities are large CI facilities will be able to do initial testing. For the remaining 63 units with a capacity of less than 10 TPD, they requesting a substitute means of compliance demonstration test from their delegated authority. Units with a proposed rule, therefore, there are no incremental costs associated with these requirements.

These rates are from the Office of Personnel Management (OPM), 2017 General Schedule (GS) pay rates and the benefit packages available to government employees.

for units less than 10 TPD that do not meet the substitute means of compliance

iii.

ital Burden

Table 8 - Summary of Incremental Annual Agency Burden and Cost of Recordkeeping and Reporting Requir

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs	Total Costs
1	2,909	145	291	3,345	\$157,000	\$0	\$157,000
2	0	0	0	0	\$0	\$0	\$0
3	0	0	0	0	\$0	\$0	\$0
Total	2,909	145	291	3,345	\$157,000	\$0	\$157,000
Average	970	48	97	1,115	\$52,333	\$0	\$52,333

ements for Emission Guidelines for Existing Other Solid Waste Incineration Units (40 CFR Part 60, Subpart FF

FF)

Capital/Startup vs. Operation and Maintenance (O&M)			
(A)	(B)	(C)	(D)
Initial Stack Test	Capital/Startup Cost for One Respondent	Number of New Respondents ^a	Total Capital/Startup Cost, (B X C)
Initial Stack Test (non-ACI Facility)	\$57,333	63	\$4,472,000
Initial Stack Test (ACI Facility)	\$3,000	0	\$0
Total			\$4,470,000

^a It is assumed that 63 facilities will test 78 units. Annual operation and maintenance costs are not

I) Costs

(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
\$0	0	\$0
\$0	0	\$0
		\$0

included, because it is assumed that all units will use a substitute means of compliance demonstrat

ion.