

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M MMMM)  
(Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M MMMM) (Renewal), EPA ICR Number 2403.06, OMB Control Number 2060-0661.

**1(b) Short Characterization/Abstract**

The Emission Guidelines and Compliance Times for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M MMMM) were proposed on October 14, 2010, and promulgated on March 21, 2011. These regulations apply to the administrators of air quality programs in either a state or local agency or in an U.S. protectorate with one or more sewage sludge incineration (SSI) units that commenced construction either on or before the date of proposal. States may choose to incorporate the model rule text directly in their state plan. If either a State or Local Agency does not develop, adopt, and submit an approvable State plan, then facilities in that state are subject to the Federal Plan (Federal Plan Requirements for Sewage Sludge Incineration Units Constructed on or Before October 14, 2010 (40 CFR Part 62, Subpart LLL)), which was adopted on April 29, 2016, at 81 FR 26040. The Federal Plan implements the emission guidelines in jurisdictions that have not developed an approved State Plan. These regulations do not directly apply to SSI unit owners and operators. However, SSI unit owners and operators must comply with the state plan to implement the emission guidelines contained in this Subpart. This ICR presents the ‘burden’ to both respondents (owners or operators of SSI units) and the Designated Administrator (either state/local agencies or the Federal government) to implement the emission guidelines imposed by the State plans. These standards only affect existing units constructed either on or before October 14, 2010; therefore, no new units will become subject to these same standards. This information is being collected to assure compliance with 40 CFR Part 60, Subpart M MMMM.

In general, all emission guidelines 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 emission guidelines.

The sewage sludge incinerator emission guidelines under Subpart M MMMM are implemented through either State plans or a Federal Plan that EPA has developed for sewage sludge incinerators located in states and in Indian country that did not develop a state or tribal plan. States directly implement and enforce their State plan. The EPA implements and enforces the Federal Plan.

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.

EPA estimates that 170 SSI units at 86 facilities will be subject to the regulation in the next three years. The “Affected Public” are owners or operators of existing SSI units. 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 1A: Annual Respondent Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart MMMM) (Renewal).

This ICR adjusts the number of respondents subject to the requirements of Subpart MMMM which are implemented under State plans and a Federal Plan. For SSI units covered by a State plan, both State and local agencies are the “implementing agency,” and will incur a burden through the review of reports submitted to them in accordance with the State plan. We assume that 48 facilities and 102 incinerator units are subject to State plans, and that 9 State and local agencies will enforce the State plans.<sup>1</sup> The “burden” to State and local agencies is attributed entirely to work performed by either State and/or local employees, and is provided at the end of this document in Table 1B: Average Annual State/Local Agency Burden and Cost – Annual Respondent Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart MMMM) (Renewal).

For SSI units covered by a Federal plan, the EPA is the implementing agency. The Federal Plan was finalized at 40 CFR Part 62, Subpart LLL on April 29, 2016 (81 FR 26040). We assume that 38 facilities and 68 incinerator units located in 15 states will operate under the Federal Plan.<sup>2</sup> 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 – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart MMMM and Federal Plan) (Renewal).

Based on our consultations with industry representatives, there are an average of 1.98 affected facilities at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 170 SSI units per year at 86 facilities will be subject to these standards and no additional new respondents per year will become subject to these same standards. Because 40 CFR Part 60, Subpart MMMM only affects existing units constructed either on or before October 14, 2010, there will be no new units subject to the rule.

The Office of Management and Budget (OMB) approved the currently-active ICR without any “Terms of Clearance”.

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1 As of June 3, 2020, EPA data and approved State Plans in the eCFR indicate that 9 State and local agencies enforce the State plans.

2 EPA data indicates that there are 68 incinerator units in the 15 states not covered by State Plans.

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under section 111(d)(1) of the Clean Air Act (CAA), as amended, to:

. . . prescribe regulations which shall establish a procedure similar to that provided by section 110 under which each State shall submit to the Administrator a plan which (A) establishes standards of performance for any existing source for any air pollutant (i) for which air quality criteria have not been issued or which is not included on a list published under section 108(a) . . . but (ii) to which a standard of performance under this section would apply if such existing source were a new source, and (B) provides for the implementation and enforcement of such standards of performance.

The EPA is required under section 129 of the Act, to establish guidelines for existing stationary sources that reflect the maximum achievable control technology (MACT) for achieving continuous emission reductions:

Section 129(a)(1)(A) states:

The Administrator shall establish performance standards and other requirements pursuant to section 111 and this section for each category of solid waste incineration units. Such standards shall include emissions limitations and other requirements applicable to new units and guidelines (under section 111(d) and this section) and other requirements applicable to existing units.

Section 129(a)(2) states:

Standards applicable to solid waste incineration units promulgated under section 111 and this section shall reflect the maximum degree of reduction in emissions of air pollutants listed under section (a)(4) that the Administrator, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable for new or existing units in each category.

Section 129(b)(1) states:

Performance standards under this section and section 111 for solid waste incineration units shall include guidelines promulgated pursuant to section 111(d) and this section applicable to existing

units. Such guidelines shall include, as provided in this section, each of the elements required by subsection (a) (emissions limitations, notwithstanding any restriction in section 111(d) regarding issuance of such limitations), subsection (c) (monitoring), subsection (d) (operator training), subsection (e) (permits), and subsection (h)(4) (residual risk).

Subpart B of 40 CFR part 60 requires State plans to include monitoring, recordkeeping, and reporting provisions consistent with the emission guidelines. In addition, section 114(a)(1) states that:

the Administrator may require any person who owns or operates any emission source, who manufactures emission control equipment or process equipment, who the Administrator believes may have information necessary for the purposes set forth in this subsection, or who is subject to any requirement of this Act (other than a manufacturer subject to the provisions of section 206(c) or 208 with respect to a provision of title II) on a one-time, periodic or continuous basis to -

- (A) establish and maintain such records;
- (B) make such reports;
- (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods;
- (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods and in such manner as the Administrator shall prescribe);
- (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical;
- (F) submit compliance certifications in accordance with section 114(a)(3); and
- (G) provide such other information, as the Administrator may reasonably require; . . . .

In the Administrator's judgment, particulate matter (PM), hydrogen chloride (HCl), carbon monoxide (CO), dioxin/furan, mercury (Hg), oxides of nitrogen (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), cadmium, lead, and fugitive emissions from SSI either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the emission guidelines were promulgated for this source category at 40 CFR Part 60, Subpart M. . . .

## **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 these emission standards. Continuous emission monitors are used to ensure compliance with the standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

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

The EPA is requiring that owners or operators of affected sources would submit electronic copies of relative accuracy test audit and performance test reports through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI).

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of relative accuracy test audit and performance tests. The EPA is also requiring that 40 CFR Part 60, Subpart M performance test reports be submitted through the EPA's ERT.

## **3. Non-duplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart M.

### **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* (86 FR 8634) on February 8, 2021. 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 these standards, 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 86 respondents will be subject to these standards over the three-year period covered by this ICR.

This ICR also adjusts the number of respondents subject to the requirements of Subpart MMMM which are implemented under State plans and a Federal Plan. The Federal Plan was finalized at 40 CFR Part 62, Subpart MMMM on April 29, 2016 at 81 FR 26040. The EPA assumes that 48 facilities and 102 incinerator units are subject to State plans and that 9 State and local agencies enforce the State plans. The remainder of these SSI Units will be covered by the Federal Plan (40 CFR Part 62, Subpart LLL).

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 Waste & Recycling Association, at (202) 244-4700, and the National Association of Clean Water Agencies, at (202) 833-2672.

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, no comments were received.

### **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 emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

### **3(e) General Guidelines**

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

These 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. The 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 either 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 SSI units. The United States Standard Industrial Classification (SIC) codes for the respondents affected by these standards and the corresponding North American Industry Classification System (NAICS) codes can be found in the table below:

| <b>40 CFR Part 60, Subpart MMMM</b> | <b>SIC Codes</b> | <b>NAICS Codes</b> |
|-------------------------------------|------------------|--------------------|
| Water Supply and Irrigation Systems | 4941, 4971       | 221310             |
| Sewage Treatment Facilities         | 4952             | 221320             |

## 4(b) Information Requested

### (i) Data Items

In this ICR, all the data that are recorded or reported is required by the Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M).

A source must make the following reports:

| <b>Notifications</b>                                    |                |
|---|----------------|
| Notification of qualified operator deviation            | §60.5235(e)(i) |
| Notification of a force majeure                         | §60.5235(f)    |
| Notification for intent to start or stop use of a CMS   | §60.5235(g)    |
| Notification of intent to conduct a performance test    | §60.5235(g)    |
| Notification of intent to reschedule a performance test | §60.5235(g)    |

| <b>Reports</b>  |                 |
|---|-----------------|
| Increments of progress report   | §60.5235(a)     |
| Initial compliance report including initial performance test result, CMS performance evaluation, site-specific operating limits, documentation of installation of bag leak detection system for fabric filter, and results of air pollution control device inspection | §60.5235(b)     |
| Annual compliance report  | §60.5235(c)     |
| Deviation reports   | §60.5235(d)     |
| Status report of qualified operator deviation   | §60.5235(e)(ii) |

A source must keep the following records:

| <b>Recordkeeping</b>   |                |
|--|----------------|
| 5-year retention of records.   | §60.5230       |
| Calendar date of each record.  | §60.5230(a)    |
| Records of increments of progress. Includes copies of the final control plan and any additional notifications.                 | §60.5230(b)    |
| Records of site-specific information and incinerator operation procedures.   | §60.5230(c)(1) |
| Records of names of persons who have completed review of the site-specific information and incinerator operating procedures in | §60.5230(c)(2) |

| <b>Recordkeeping</b>   |                |
|--|----------------|
| 60.5230(c)(1).   |                |
| Records of names of persons who have completed the operator training requirements. Includes documentation of the training and the dates of the training.             | §60.5230(c)(2) |
| Records showing the periods when no qualified operators were accessible for more than 8 hours, but less than two weeks.  | §60.5230(c)(3) |
| Records showing the periods when no qualified operators were accessible for two weeks or more.   | §60.5230(c)(4) |
| Records of control device inspections.   | §60.5230(d)    |
| Records of initial performance tests, annual performance tests, and any subsequent performance tests.  | §60.5230(e)    |
| Records of all continuous monitoring data; includes continuous emissions monitors, continuous automated sampling systems, and continuous parameter monitors.         | §60.5230(f)    |
| Records of other info for continuous monitoring systems.   | §60.5230(g)    |
| Records of days when a deviation from the operating limits have occurred. Includes a description of the deviation and a description of the corrective actions taken. | §60.5230(h)    |
| Equipment vendor specifications for the incinerator, emission controls, and monitoring equipment.  | §60.5230(i)    |
| Records of calibration of any monitoring devices.  | §60.5230(j)    |
| Records of monitoring plan and performance evaluations.  | §60.5230(k)    |
| Records of less frequent testing.  | §60.5230(l)    |
| Records of use of bypass stack.  | §60.5230(m)    |
| Record of malfunctions.  | §60.5230(n)    |

### 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.

As of January 1, 2012, respondents are required to use the EPA's Electronic Reporting Tool (ERT) to develop relative accuracy test audit (i.e., reference method) data and performance test (i.e., compliance test) data, except opacity data, through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). Only data collected using test methods compatible with ERT are subject to this requirement, which is to be submitted electronically into EPA's

WebFIRE database. The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. For purposes of this ICR, it is assumed that there is no additional burden associated with the proposed requirement for respondents to submit the reports electronically.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

**(ii) Respondent Activities**

| <b>Respondent Activities</b>   |
|--|
| Familiarization with the regulatory requirements.  |
| Install, calibrate, maintain, and operate CMS for opacity, CO, PM, or for continuous parameter monitoring (including CEMS).                                |
| Perform initial performance test, Reference Method 5, 6, 6C, 7, 7E, 10, 10A, 10B, 22, 23, 26A, 29, 30B tests, 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:

| <b>Agency Activities</b>  |
|---|
| Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry. |
| Audit facility records.   |
| 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 standard, 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 annual and 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. The 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**

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of these regulations. The emission guidelines do not contain any provisions reserved exclusively for the benefit of small entities. However, the emission guidelines do 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).

The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

## **5(d) Collection Schedule**

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

## **6. Estimating the Burden and Cost of the Collection**

Table 1A 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.

Table 1B documents the computation of annual burden for State and local agencies that implement and enforce the State plan. State and local agency ‘burden’ is expressed under standardized headings, which are believed to be consistent with the concept of ‘Burden’ under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified in the table. On average, 9 State/local agencies will be enforcing State plans that cover 102 SSI units affected by State plans. State and local agencies conduct the same activities as EPA.

In total, the emission guidelines for SSI units are estimated to affect an average of 170 incinerators. Of these, 68 are affected by the Federal Plan and 102 are affected by State plans.

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 recordkeeping and reporting requirements is estimated to be 32,800 hours (Total Labor Hours from Table 1A below). The average annual burden to State and local agencies that implement and enforce State plans is 1,880 hours (Total Labor Hours from Table 1B below). State and local agencies conduct the same activities as the EPA. These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the emission guidelines 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 for employees at incinerators:

|            |                           |
|------------|---------------------------|
| Managerial | \$149.84 (\$71.35 + 110%) |
| Technical  | \$122.66 (\$58.41 + 110%) |

Clerical \$60.88 (\$28.99 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry. For respondents (i.e., operators of incinerators), it was assumed that the work performed will be completed by private contractors. Details upon which this estimate is based appear in Table 1A: Annual Respondent Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal).

For public-sector respondents (i.e., state or local agencies), EPA applied the same Federal government employee labor rates as EPA agency staff, which are presented in Section 6(c). Details upon which this estimate is based appear in Table 1B: Average Annual State/Local Agency Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal).

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

The type of industry costs associated with the information collection activities in the subject standards 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 these regulations. 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**

| <b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b> |  |                                  |  |  |                                       |                           |
|--|--|----------------------------------|--|--|---------------------------------------|---------------------------|
| (A)<br>Continuous Monitoring Device                                  | (B)<br>Capital/Startup Cost for One Respondent | (C)<br>Number of New Respondents | (D)<br>Total Capital/Startup Cost, (B X C) | (E)<br>Annual O&M Costs for One Respondent | (F)<br>Number of Respondents with O&M | (G)<br>Total O&M, (E X F) |
| <b>Fluidized Bed <sup>a</sup></b>                                    |  |                                  |  |  |                                       |                           |
| PBS parameter monitors   | \$24,300                                       | 0                                | \$0  | \$5,600                                    | 6                                     | \$33,600                  |
| SNCR monitors  | \$10,300                                       | 0                                | \$0  | \$3,200                                    | 2                                     | \$6,400                   |
| Initial and annual stack test <sup>b</sup>                           | \$61,740                                       | 0                                | \$0  | \$21,348                                   | 18                                    | \$384,264                 |
| <b>Multiple Hearth <sup>a</sup></b>                                  |  |                                  |  |  |                                       |                           |
| PBS parameter monitors   | \$24,300                                       | 0                                | \$0  | \$5,600                                    | 8                                     | \$44,800                  |
| Initial and annual stack test <sup>b</sup>                           | \$61,740                                       | 0                                | \$0  | \$23,302                                   | 38                                    | \$885,476                 |
| <b>Total <sup>c</sup></b>  |  |                                  | <b>\$0</b>                                 |  |                                       |                           |

| <b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b> |  |  |  |  |  |                    |
|--|--|--|--|--|--|--------------------|
|  |  |  |  |  |  | <b>\$1,350,000</b> |

<sup>a</sup> There are a total of 55 fluidized bed units and 114 multiple hearth units.

<sup>b</sup> Facilities may test every three years if certain requirements are met, thus annual testing is divided by three to give a per year cost. It is assumed most facilities would meet the requirements. Annual fluidized bed tests =  $55 / 3 = 18.33$ , rounded to 18 tests per year. Annual multiple hearth tests =  $114 / 3 = 38$  tests per year.

<sup>c</sup> 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 \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$1,350,000. 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 \$1,350,000. These are the O&M recordkeeping costs,

### **6(c) Estimating Agency Burden and Cost**

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA's overall compliance and enforcement program includes such activities 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 \$78,800. This cost is based on the average hourly labor rate as follows:

|            |  |
|------------|--|
| Managerial | \$69.04 (GS-13, Step 5, \$43.15 + 60%) |
| Technical  | \$51.23 (GS-12, Step 1, \$32.02 + 60%) |
| Clerical   | \$27.73 (GS-6, Step 3, \$17.33 + 60%)  |

These rates are from the Office of Personnel Management (OPM), 2021 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 – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (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 86 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 86 per year.

The number of respondents is calculated using the following table that addresses the three

years covered by this ICR:

| <b>Number of Respondents</b> |   |                                       |   |   |  |
|------------------------------|---|---------------------------------------|---|---|--|
|                              | Respondents That Submit Reports               |                                       | Respondents That Do Not Submit Any Reports  |   |  |
| Year                         | (A)<br>Number of New Respondents <sup>1</sup> | (B)<br>Number of Existing Respondents | (C)<br>Number of Existing Respondents that keep records but do not submit reports | (D)<br>Number of Existing Respondents That Are Also New Respondents | (E)<br>Number of Respondents (E=A+B+C-D) |
| 1                            | 0   | 86                                    | 0   | 0   | 86                                       |
| 2                            | 0   | 86                                    | 0   | 0   | 86                                       |
| 3                            | 0   | 86                                    | 0   | 0   | 86                                       |
| Average                      | 0   | 86                                    | 0   | 0   | 86                                       |

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

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 86.

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

| <b>Total Annual Responses</b>                 |                              |                            |   |   |
|---|------------------------------|----------------------------|---|---|
| (A)<br>Information Collection Activity        | (B)<br>Number of Respondents | (C)<br>Number of Responses | (D)<br>Number of Existing Respondents That Keep Records But Do Not Submit Reports | (E)<br>Total Annual Responses E=(BxC)+D |
| Notification of performance test              | 0                            | 1                          | 0   | 0                                       |
| Notification of CMS demonstration             | 0                            | 1                          | 0   | 0                                       |
| Final control plan                            | 0                            | 1                          | 0   | 0                                       |
| Initial compliance report                     | 0                            | 1                          | 0   | 0                                       |
| Annual stack test <sup>a</sup>                | 56                           | 1                          | 0   | 56                                      |
| Annual compliance report <sup>b</sup>         | 170                          | 1                          | 0   | 170                                     |
| Qualified operator notification <sup>c</sup>  | 9                            | 1                          | 0   | 9                                       |
| Qualified operator status report <sup>c</sup> | 9                            | 2                          | 0   | 18                                      |
| Semiannual Deviation Report <sup>d</sup>      | 9                            | 2                          | 0   | 18                                      |
|   |                              |                            | <b>Total</b>  | <b>271</b>                              |

<sup>a</sup> Facilities may test every three years if certain requirements are met, thus annual testing is divided by three to give a per year cost. It is assumed most facilities would meet the requirements. Number of tests per year =  $170 / 3 = 56.1$ , rounded to 56 tests per year.

<sup>b</sup> Based on the number of SSI units.

<sup>c</sup> Assumed that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year. We assumed that this required only two status reports. 86 facilities x 10% = 8.6, rounded to 9 facilities.

<sup>d</sup> Assumed that 10 percent of the facilities would have an exceedance during the year. 86 facilities x 10% = 8.6, rounded to 9 facilities.

The number of Total Annual Responses is 271.

The total annual labor costs for respondents are \$3,880,000. Details regarding these estimates may be found at the end of this document in Table 1A: Annual Respondent Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal).

The total annual labor costs for State and local agencies are \$106,000. Details regarding these estimates may be found at the end of this document in Table 1B: Average Annual State/Local Agency Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal).

### **6(e) Bottom Line Burden Hours and Cost Tables**

The detailed bottom line burden hours and cost calculations for the respondents, State and local agencies, and the Agency are shown in Tables 1A, 1B, and 2 at the end of this document, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours for respondents are 32,800 hours. Details regarding these estimates may be found in Table 1A: Annual Respondent Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal).

The total annual labor hours for State and local agencies is 1,880. Details regarding these estimates may be found in Table 1B: Average Annual State/Local Agency Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (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 121 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$1,350,000. 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 1,350 labor hours at a cost of \$78,800; see below in Table 2: Average Annual EPA Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M and Federal Plan) (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 no change in ‘burden’ from the most recently-approved ICR as currently identified in the OMB Inventory of Approved Burdens. This situation is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for this industry is very low or non-existent, so there is no significant change in the overall burden. Since there are no changes in the regulatory requirements and there is no significant industry growth, there are also no changes in the capital/startup or operation and maintenance (O&M) costs. There is a slight increase in costs, which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (September 2020) to calculate respondent burden costs.

This ICR also adjusts the number of respondents subject to the requirements of Subpart M which are implemented under State plans and a Federal Plan to incorporate the burden associated with the Federal Plan. The Federal Plan was finalized at 40 CFR Part 62, Subpart L on April 29, 2016. As of June 3, 2021, EPA data and the listing of approved State plans in the eCFR indicates that 9 State and local agencies enforce the State plans and the remainder of these SSI units will be covered by the Federal Plan. The burden on State and local agencies is included in respondent burden in this ICR, and is similar to the Agency burden in the previous ICR.

#### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 121 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 use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2020-0669. 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. Due to COVID-19 precautions, entry to the Reading Room is available by appointment only. Please contact personnel in the Reading Room to schedule an appointment. 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-OAR-2020-0669 and OMB Control Number 2060-0661 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 1A: Annual Respondent Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal)**

| Burden Item  | (A)                             | (B)   | (C)                                   | (D)   | (E)                              | (F)                                  | (G)                               | (H)                          |
|--|---------------------------------|---|---------------------------------------|---|----------------------------------|--------------------------------------|-----------------------------------|------------------------------|
|  | Respondent Hours per Occurrence | Number of Occurrences Per Respondent Per Year | Hours Per Respondent Per Year (C=AxB) | Number of Respondents Per Year <sup>a</sup> | Technical Hours Per Year (E=CxD) | Management Hours Per Year (F=Ex0.05) | Clerical Hours Per Year (G=Ex0.1) | Total Costs, \$ <sup>b</sup> |
| 1. Applications  | N/A                             |   |                                       |   |                                  |                                      |                                   |                              |
| 2. Surveys and Studies   | N/A                             |   |                                       |   |                                  |                                      |                                   |                              |
| 3. Reporting Requirements  |                                 |   |                                       |   |                                  |                                      |                                   |                              |
| A. Familiarize with the regulatory requirements <sup>c,d</sup>       | 40                              | 1   | 40                                    | 86  | 3,440                            | 172                                  | 344                               | \$468,666                    |
| B. Required Activities   |                                 |   |                                       |   |                                  |                                      |                                   |                              |
| 1) Initial stack test and report <sup>e</sup>                        | 40                              | 1   | 40                                    | 0   | 0                                | 0                                    | 0                                 | \$0                          |
| 2) Annual stack test and test report <sup>f,g</sup>                  | 40                              | 0.33  | 13.2                                  | 170   | 2,244                            | 112.2                                | 224                               | \$305,722.56                 |
| 3) Operator training and qualification                               |                                 |   |                                       |   |                                  |                                      |                                   |                              |
| a) Establish and teach operator qualification course <sup>d,e</sup>  | 64                              | 1   | 64                                    | 0   | 0                                | 0                                    | 0                                 | \$0                          |
| b) Obtain operator qualification <sup>d,e</sup>                      | 72                              | 1   | 72                                    | 0   | 0                                | 0                                    | 0                                 | \$0                          |
| c) Annual refresher course <sup>d,f</sup>                            | 12                              | 1   | 12                                    | 86  | 1,032                            | 51.6                                 | 103                               | \$140,599.68                 |
| d) Initial review of site-specific information                       | See 3B                          |   |                                       |   |                                  |                                      |                                   |                              |
| e) Annual review of site-specific information <sup>d,f</sup>         | 8                               | 1   | 8                                     | 86  | 688                              | 34.4                                 | 68.8                              | \$93,733.12                  |
| 4) Establish operating parameters (maximum and minimum) <sup>e</sup> | 40                              | 1   | 40                                    | 0   | 0                                | 0                                    | 0                                 | \$0                          |
| 5) Continuous parameter monitoring (including CEMS)                  |                                 |   |                                       |   |                                  |                                      |                                   |                              |
| a) Initial monitoring <sup>e</sup>                                   | 11                              | 1   | 11                                    | 0   | 0                                | 0                                    | 0                                 | \$0                          |
| b) Annual monitoring <sup>f</sup>                                    | 11                              | 1   | 11                                    | 170   | 1,870                            | 93.5                                 | 187                               | \$254,768.80                 |
| C. Create Information  | See 3B                          |   |                                       |   |                                  |                                      |                                   |                              |
| D. Gather Information  | See 3E                          |   |                                       |   |                                  |                                      |                                   |                              |
| E. Report Preparation  |                                 |   |                                       |   |                                  |                                      |                                   |                              |
| 1) Notification of initial performance test <sup>e</sup>             | 2                               | 1   | 2                                     | 0   | 0                                | 0                                    | 0                                 | \$0                          |

| Burden Item   | (A)                             | (B)   | (C)                                   | (D)   | (E)                              | (F)                                  | (G)                               | (H)                          |
|---|---------------------------------|---|---------------------------------------|---|----------------------------------|--------------------------------------|-----------------------------------|------------------------------|
|   | Respondent Hours per Occurrence | Number of Occurrences Per Respondent Per Year | Hours Per Respondent Per Year (C=AxB) | Number of Respondents Per Year <sup>a</sup> | Technical Hours Per Year (E=CxD) | Management Hours Per Year (F=Ex0.05) | Clerical Hours Per Year (G=Ex0.1) | Total Costs, \$ <sup>b</sup> |
| 2) Notification of initial CMS Demonstration <sup>d, e</sup>                        | 2                               | 1   | 2                                     | 0   | 0                                | 0                                    | 0                                 | \$0                          |
| 3) Final Control Plan <sup>e</sup>  | 20                              | 1   | 20                                    | 0   | 0                                | 0                                    | 0                                 | \$0                          |
| 4) Initial Compliance Report <sup>e</sup>   | 40                              | 1   | 40                                    | 0   | 0                                | 0                                    | 0                                 | \$0                          |
| 5) Report for site-specific parameter petition <sup>e, h</sup>                      | 14                              | 1   | 14                                    | 0   | 0                                | 0                                    | 0                                 | \$0                          |
| 6) Annual Compliance Report   | 40                              | 1   | 40                                    | 170   | 6,800                            | 340                                  | 680                               | \$926,432.00                 |
| 7) Notification for operators that are off-site for more than 2 weeks <sup>i</sup>  | 8                               | 1   | 8                                     | 9   | 72                               | 3.6                                  | 7.2                               | \$9,809.28                   |
| 8) Status report for operators that are off-site for more than 2 weeks <sup>i</sup> | 8                               | 2   | 16                                    | 9   | 144                              | 7.2                                  | 14.4                              | \$19,618.56                  |
| 9) Semiannual Deviation Report <sup>j</sup>   | 24                              | 2   | 48                                    | 9   | 432                              | 21.6                                 | 43.2                              | \$58,855.68                  |
| <b>Subtotal for Reporting Requirements</b>  |                                 |   |                                       |   |                                  | <b>19,230</b>                        |                                   | <b>\$2,278,205</b>           |
| 4. Recordkeeping Requirements   |                                 |   |                                       |   |                                  |                                      |                                   |                              |
| A. Familiarize with the regulatory 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                                   | 86  | 8,944                            | 447                                  | 894                               | \$1,218,531                  |
| 2) Records of exceedances of the operating parameters <sup>j</sup>                  | 2                               | 1   | 2                                     | 9   | 18                               | 0.9                                  | 1.8                               | \$2,452.32                   |
| 3) Records of stack tests <sup>g</sup>  | 2                               | 0.33  | 0.66                                  | 86  | 56.76                            | 2.84                                 | 5.68                              | \$7,732.98                   |
| 4) Records of persons who have reviewed operating procedures                        | 2                               | 1   | 2                                     | 86  | 172                              | 8.6                                  | 17.2                              | \$23,433.28                  |
| 5) Records of persons who have completed operator training                          | 2                               | 1   | 2                                     | 86  | 172                              | 8.6                                  | 17.2                              | \$23,433.28                  |
| 6) Records of persons who meet operator qualification criteria                      | 2                               | 1   | 2                                     | 86  | 172                              | 8.6                                  | 17.2                              | \$23,433.28                  |
| 7) Records of monitoring device calibration   | 2                               | 1   | 2                                     | 86  | 172                              | 8.6                                  | 17.2                              | \$23,433.28                  |
| 8) Records of site-specific documentation   | 24                              | 1   | 24                                    | 86  | 2,064                            | 103                                  | 206                               | \$281,199.36                 |

| Burden Item   | (A)                             | (B)   | (C)                                   | (D)   | (E)                              | (F)                                  | (G)                               | (H)                          |
|---|---------------------------------|---|---------------------------------------|---|----------------------------------|--------------------------------------|-----------------------------------|------------------------------|
|   | Respondent Hours per Occurrence | Number of Occurrences Per Respondent Per Year | Hours Per Respondent Per Year (C=AxB) | Number of Respondents Per Year <sup>a</sup> | Technical Hours Per Year (E=CxD) | Management Hours Per Year (F=Ex0.05) | Clerical Hours Per Year (G=Ex0.1) | Total Costs, \$ <sup>b</sup> |
| F. Personnel Training                                       | See 3B                          |   |                                       |   |                                  |                                      |                                   |                              |
| G. Time for Audits  | N/A                             |   |                                       |   |                                  |                                      |                                   |                              |
| <b>Subtotal for Recordkeeping Requirements</b>              |                                 |   |                                       |   |                                  | 13,536                               |                                   | \$1,603,648                  |
| <b>Total Labor Burden and Costs (rounded)<sup>k</sup></b>   |                                 |   |                                       |   |                                  | 32,800                               |                                   | \$3,880,000                  |
| <b>Total Capital and O&amp;M Cost (rounded)<sup>k</sup></b> |                                 |   |                                       |   |                                  |                                      |                                   | \$1,350,000                  |
| <b>GRAND TOTAL (rounded)<sup>k</sup></b>                    |                                 |   |                                       |   |                                  |                                      |                                   | \$5,230,000                  |

**Assumptions:**

<sup>a</sup> We have assumed that there will be an average of 170 units at 86 facilities that will be subject to the rule. Because the standard only affects existing units constructed on or before October 14, 2010; there will be no new units subject to the rule.

<sup>b</sup> This ICR uses the following labor rates: \$149.84 per hour for Executive, Administrative, and Managerial labor; \$122.66 per hour for Technical labor, and \$60.88 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, “Table 2. Civilian Workers, by Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed that all existing respondents will have to familiarize with the regulatory requirements each year.

<sup>d</sup> Cost incurred by a facility regardless of the number of affected units at the plant.

<sup>e</sup> This is a one-time only cost.

<sup>f</sup> Annual costs are not incurred until the second year of operation.

<sup>g</sup> Facilities may test every three years if certain requirements are met, thus annual testing is divided by three to give a per year cost. It is assumed most facilities would meet the requirements.

<sup>h</sup> Assumed that none of the facilities will petition for site-specific parameters.

<sup>i</sup> Assumed that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year (86 x 10% = 8.6, rounded to 9 facilities). Assumed that this required only two status reports.

<sup>j</sup> Assumed that 10 percent of the facilities would have an exceedance during the year (86 x 10% = 8.6, rounded to 9 facilities).

<sup>k</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 1B: Average Annual State/Local Agency Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal)**

| Burden Item   | (A)                                     | (B)   | (C)  | (D)   | (E)                              | (F)                                  | (G)                               | (H)                                 |
|---|---|---|--|---|----------------------------------|--------------------------------------|-----------------------------------|-------------------------------------|
|   | State/Local Agency Hours per Occurrence | Number of Occurrences Per Respondent Per Year | State/Local Agency Hours Per Respondent Per Year (C=AxB) | Number of Respondents Per Year <sup>a</sup> | Technical Hours Per Year (E=CxD) | Management Hours Per Year (F=Ex0.05) | Clerical Hours Per Year (G=Ex0.1) | Annual Costs (\$/year) <sup>b</sup> |
| 1. Applications   | N/A                                     |   |  |   |                                  |                                      |                                   |                                     |
| 2. Read and Understand Rule Requirements  | 40                                      | 1   | 40   | 0   | 0                                | 0                                    | 0                                 | \$0                                 |
| 3. Required Activities  |   |   |  |   |                                  |                                      |                                   |                                     |
| A. Observe stack tests <sup>c</sup>   | 48                                      | 1   | 48   | 7   | 336                              | 16.8                                 | 33.6                              | \$19,304.88                         |
| B. Excess emissions -- Enforcement Activities <sup>d</sup>  | 24                                      | 1   | 24   | 5   | 120                              | 6                                    | 12                                | \$6,894.60                          |
| C. Create Information   | N/A                                     |   |  |   |                                  |                                      |                                   |                                     |
| D. Gather Information   | N/A                                     |   |  |   |                                  |                                      |                                   |                                     |
| E. Report Reviews   |   |   |  |   |                                  |                                      |                                   |                                     |
| 1) Review initial notifications   | 20                                      | 1   | 20   | 0   | 0                                | 0                                    | 0                                 | \$0                                 |
| 2) Review initial compliance report   | 40                                      | 1   | 40   | 0   | 0                                | 0                                    | 0                                 | \$0                                 |
| 3) Review annual compliance report  | 8                                       | 1   | 8  | 102   | 816                              | 40.8                                 | 81.6                              | \$46,883.28                         |
| 4) Review semiannual excess emission and parameter exceedance report <sup>d</sup>   | 16                                      | 2   | 32   | 5   | 160                              | 8                                    | 16                                | \$9,192.80                          |
| 5) Review notification and status reports for operators off-site <sup>e</sup>   | 4                                       | 3   | 12   | 5   | 60                               | 3                                    | 6                                 | \$3,447.30                          |
| F. Prepare annual summary report <sup>f</sup>   | 3                                       | 1   | 3  | 48  | 144                              | 7.2                                  | 14.4                              | \$8,273.52                          |
| 5. Travel expenses: (1 person * 48 hours per trip / 8 hours per day * \$75 per diem) + (\$600 per round trip) = \$1,050 per trip (\$1,050 per trip x 11 trips) = \$11,550 |   |   |  |   |                                  |                                      |                                   | \$11,550                            |
| <b>TOTAL (rounded)<sup>g</sup></b>  |   |   |  |   |                                  | <b>1,880</b>                         |                                   | <b>\$106,000</b>                    |

**Assumptions**

<sup>a</sup> We have assumed that there will be an average of 170 units at 86 facilities that will be subject to the rule. We assume that 9 states/local jurisdictions (consisting of 48 facilities and 102 incinerator units) have been delegated authority by EPA and that 15 states/local jurisdictions (consisting of 38 facilities and

68 incinerator units) will operate under the Federal Plan.

<sup>b</sup> This cost is based on the following labor rates: Managerial rate of \$69.04 (GS-13, Step 5, \$43.15 + 60%), Technical rate of \$51.23 (GS-12, Step 1, \$32.02 + 60%), and Clerical rate of \$27.73 (GS-6, Step 3, \$17.33 + 60%). The rates have been increased by 60 percent to account for the benefit packages available to government employees. These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay.

<sup>c</sup> We assume that State/local agency personnel attends 20 percent of the stack tests. Facilities may test every three years if certain requirements are met, thus annual testing is divided by three to give a per year cost. It is assumed most facilities would meet the requirements.  $(102 \text{ units per year} \times 0.333 \text{ stack test/unit} \times 20\%) = 6.79$ , rounded to 7 stack tests per year)

<sup>d</sup> We assume that 10 percent of the 48 facilities would have an exceedance during the year  $(48 \times 10\% = 4.8)$ , rounded to 5 facilities).

<sup>e</sup> 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 assume that this will require only two status reports, resulting in a total of 3 reports (1 notification and 2 status reports).

<sup>f</sup> We assume that the 9 states/local agencies that have been delegated authority will take 3 hours per SSI facility to prepare the annual summary report for the 48 sewage sludge incinerator facilities in state/local jurisdictions.

<sup>g</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 2: Average Annual EPA Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M and Federal Plan) (Renewal)**

| Burden Item   | (A)                      | (B)   | (C)                                       | (D)   | (E)                              | (F)                                  | (G)                               | (H)                                 |
|---|--------------------------|---|---|---|----------------------------------|--------------------------------------|-----------------------------------|-------------------------------------|
|   | EPA Hours per Occurrence | Number of Occurrences Per Respondent Per Year | EPA Hours Per Respondent Per Year (C=AxB) | Number of Respondents Per Year <sup>a</sup> | Technical Hours Per Year (E=CxD) | Management Hours Per Year (F=Ex0.05) | Clerical Hours Per Year (G=Ex0.1) | Annual Costs (\$/year) <sup>b</sup> |
| 1. Applications   | N/A                      |   |   |   |                                  |                                      |                                   |                                     |
| 2. Read and Understand Rule Requirements  | 40                       | 1   | 40  | 0   | 0                                | 0                                    | 0                                 | \$0                                 |
| 3. Required Activities  |                          |   |   |   |                                  |                                      |                                   |                                     |
| A. Observe stack tests <sup>c</sup>   | 48                       | 1   | 48  | 5   | 240                              | 12                                   | 24                                | \$13,789.20                         |
| B. Excess emissions -- Enforcement Activities <sup>d</sup>  | 24                       | 1   | 24  | 4   | 96                               | 4.8                                  | 9.6                               | \$5,515.68                          |
| C. Create Information   | N/A                      |   |   |   |                                  |                                      |                                   |                                     |
| D. Gather Information   | N/A                      |   |   |   |                                  |                                      |                                   |                                     |
| E. Report Reviews   |                          |   |   |   |                                  |                                      |                                   |                                     |
| 1) Review initial notifications   | 20                       | 1   | 20  | 0   | 0                                | 0                                    | 0                                 | \$0                                 |
| 2) Review initial compliance report   | 40                       | 1   | 40  | 0   | 0                                | 0                                    | 0                                 | \$0                                 |
| 3) Review annual compliance report  | 8                        | 1   | 8   | 68  | 544                              | 27.2                                 | 54.4                              | \$31,255.52                         |
| 4) Review semiannual excess emission and parameter exceedance report <sup>d</sup>   | 16                       | 2   | 32  | 4   | 128                              | 6.4                                  | 12.8                              | \$7,354.24                          |
| 5) Review notification and status reports for operators off-site <sup>e</sup>   | 4                        | 3   | 12  | 4   | 48                               | 2.4                                  | 4.8                               | \$2,757.84                          |
| F. Prepare annual summary report <sup>f</sup>   | 3                        | 1   | 3   | 38  | 114                              | 5.7                                  | 11.4                              | \$6,549.87                          |
| 5. Travel expenses: (1 person * 48 hours per trip / 8 hours per day * \$75 per diem) + (\$600 per round trip) = \$1,050 per trip (\$1,050 per trip x 11 trips) = \$11,550 |                          |   |   |   |                                  |                                      |                                   | \$11,550                            |
| <b>TOTAL (rounded)<sup>g</sup></b>  |                          |   |   |   |                                  | <b>1,350</b>                         |                                   | <b>\$78,800</b>                     |

**Assumptions**

<sup>a</sup> We have assumed that there will be an average of 170 units at 86 facilities that will be subject to the rule. We assume that 9 states/local jurisdictions (consisting of 48 facilities and 102 incinerator units) have been delegated authority by EPA and that 15 states/local jurisdictions (consisting of 38 facilities and 68 incinerator units) will operate under the Federal Plan.

<sup>b</sup> This cost is based on the following labor rates: Managerial rate of \$69.04 (GS-13, Step 5, \$43.15 + 60%), Technical rate of \$51.23 (GS-12, Step 1, \$32.02 + 60%), and Clerical rate of \$27.73 (GS-6, Step 3, \$17.33 + 60%). The rates have been increased by 60 percent to account for the benefit packages available to government employees. These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay.

<sup>c</sup> We assume that EPA personnel attends 20 percent of the stack tests. Facilities may test every three years if certain requirements are met, thus annual testing is divided by three to give a per year cost. It is assumed most facilities would meet the requirements.  $(68 \text{ units per year} \times 0.333 \text{ stack test/unit} \times 20\%) = 4.53$ , rounded to 5 stack tests per year)

<sup>d</sup> We assume that 10 percent of the 38 facilities would have an exceedance during the year  $(38 \times 10\% = 3.8)$ , rounded to 4 facilities).

<sup>e</sup> 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 assume that this will require only two status reports, resulting in a total of 3 reports (1 notification and 2 status reports).

<sup>f</sup> We assume that EPA will take 3 hours per SSI facility to prepare the annual summary report for the 38 sewage sludge incinerator facilities operating under the Federal Plan.

<sup>g</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.