

Burden item	(A) Hours per Occurrence	(B) No. of occurrences per respondent per year	(C) Hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical hours per year (E=CxD)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting requirements					
A. Familiarization with Regulatory Requirements	1	1	1	22	22
B. Required activities					
Initial performance test for Eb ^{c, d, e}	24	1	24	0	0
Repeat performance test for Eb ^{e, f}	24	1	24	0	0
Demonstration/CEMS for Eb ^{c, d}	24	1	24	0	0
Repeat CEM demonstration Eb ^f	24	1	24	0	0
Annual compliance test for Ea ^{g, i}	24	1	24	17	408
Annual compliance test for Eb ^{e, h}	24	1	24	5	120
Appendix F audit for Ea (in-situ)	125	8	1,000	0	0
Appendix F audit for Ea (extractive)	36	8	288	0	0
C. Create Information	See 3B				
D. Gather information	See 3B				
E. Write report					
Notification of construction/reconstruction for Ea	2	1	2	0	0
Notification of actual startup – Ea	2	1	2	0	0
Notification of initial performance test – Ea	2	1	2	0	0
Notification of CMS demonstration – Ea	2	1	2	0	0
Notification of construction/reconstruction – Eb ^{c, d}	2	1	2	0	0
Notification of initial performance test – Eb ^{c, d}	2	1	2	0	0
Notification of CMS demonstration – Eb ^{c, d}	2	1	2	0	0
Annual compliance reports for Ea	16	1	16	17	272
Annual opacity report of no excess emission for Ea ^j	8	1	8	13.6	108.8
Annual opacity report for excess emission for Ea ^j	16	1	16	3.4	54.4
Report of daily weight of MSW and fuel for Ea	34	4	136	17	2312
Appendix F reports for Ea	11	4	44	17	748
Initial compliance report for Eb ^{c, d}	40	1	40	0	0
Annual compliance report for Eb	40	1	40	5	200
Semiannual excess emission report Eb ^k	17	2	34	5	170
Appendix F reports for Eb ^l	11	4	44	5	220
Initial site selection analysis/report for Eb ^{c, d}	270	1	270	0	0
Public meeting and comment response for Eb ^{c, d}	140	1	140	0	0
Subtotal for Reporting Requirements					
4. Recordkeeping requirements					
A. Familiarization with Regulatory Requirements	See 3A				
B. Plan activities	See 4E				
C. Implement activities	See 4E				

D. Develop record system	See 4E				
E. Time to enter information					
Records of SSM for Ea ^m	1.5	104	156	17	2,652
Record emission measurements Ea ^m	1.5	104	156	17	2,652
Record of employee review of operation for Ea ⁿ	4	2	8	17	136
Record of emission rates, and computation tests for Eb ^o	1.5	94	141	5	705
Record of SSM for Eb ^o	1.5	94	141	5	705
Record of employee review of operation for Eb ⁿ	4	2	8	5	40
Record amount of sorbent for Hg control for Eb	0.1	94	9.4	5	47
F. Train personnel	See 4E				
G. Audits	See 4E				
Subtotal for Recordkeeping Requirements					
TOTAL LABOR BURDEN AND COST (rounded)^p					
TOTAL CAPITAL AND O&M COST (rounded)^p					
GRAND TOTAL (rounded)^p					

^a On average, EPA estimates 22 existing sources will be subject to the NESHAP, including 17 sources subject to Ea, and 5 sources subject to Eb over the next three years.

^b This ICR uses the following labor rates: \$122.66 (technical), \$149.84 (managerial), and \$60.88 (clerical). These rates are from the Bureau of Economic Analysis, September 2020, “Table 2. Civilian workers, by occupational and industry group.” The rates are from column 1, “Total compensation including benefit packages available to those employed by private industry. We have estimated that the contractors’ rate for emission testing is \$100 per hour.

^c Applies to new or reconstructed sources only.

^d EPA assumes no existing facilities will implement process changes over the next 3 years.

^e We have assumed that it will take an emission testing contractor 1,053 hours to perform both initial performance test and repeat performance test for 17 sources.

^f We have assumed that 20 percent of the respondents will have to repeat a performance test or CEMS demonstration for 17 sources.

^g We have assumed that all of the 17 respondents for subpart Ea will have to complete an annual compliance test.

^h We have assumed that all 5 respondents for subpart Eb will have to complete an annual compliance test.

ⁱ We have assumed that it will take an emission testing contractor 826 hours to complete an annual compliance test for Eb.

^j We have assumed that 80 percent of respondents will file an opacity report of no excess emission for Ea and will submit an opacity report of excess emission for Ea and submit periodic reports on a quarterly basis.

^k We have assumed that 5 of the respondents will be required to write semiannual excess emission report for Eb two times per year.

^l We have assumed that 5 of the respondents will write the appendix F reports four times per year.

^m We have assumed that all 17 respondents for subpart Ea will each take 104 hours to complete task.

ⁿ We have assumed that all 17 respondents for subpart Ea and all 5 respondents for subpart Eb will each take 4 hours two times per year to complete task.

^o We have assumed that each of the 5 respondents subject to Eb will take 1.5 hours 94 times per year to enter information.

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

149.84

60.88

80

(F) Management hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.1)	(H) Emission Test Hours per Occurrence	(I) Emission Testing Contractor Hours per Year (HxD)	(J) Total Cost per year ^b
1.1	2.2	1	22	\$4,757.28
0	0	1,053	0	\$0
0	0	1,053	0	\$0
0	0	470	0	\$0
0	0	470	0	\$0
20.4	40.8	826	14,042	\$1,178,945.92
6	12	1,053	5,265	\$437,548.80
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
13.6	27.2	0	0	\$37,057.28
5.44	10.88	0	0	\$14,822.91
2.72	5.44	0	0	\$7,411.46
115.6	231.2	0	0	\$314,986.88
37.4	74.8	0	0	\$101,907.52
0	0	0	0	\$0
10	20	0	0	\$27,248.00
8.5	17	0	0	\$23,160.80
11	22	0	0	\$29,972.80
0	0	0	0	\$0
0	0	0	0	\$0
5,330			19,329	
24,659				\$2,177,820

132.6	265.2	0	0	\$361,308.48
132.6	265.2	0	0	\$361,308.48
6.8	13.6	0	0	\$18,528.64
35.25	70.5	0	0	\$96,049.20
35.25	70.5	0	0	\$96,049.20
2	4	0	0	\$5,449.60
2.35	4.7	0	0	\$6,403.28
7,978			0	
7,980				\$945,000
32,600				\$3,120,000
				\$197,000
				\$3,320,000

Capital/Startu

A
CEMs for subpart Ea
CEMs for subpart Eb
Total

hr/resp 159
 No. response 205

5 sources subject to Eb. EPA estimates no plant (respondent) to startup over

re from the United States Department of Labor, Bureau of Labor Statistics, compensation.” They have been increased by 110 percent to account for the n testing would be \$80.00 per hour.

ormance tests for subpart Eb.
 Eb.

periodic reports on a semiannual basis, and 20 percent of respondents will file

imes per year to record employee review of operations.

up vs. O&M Costs

B	C	D	E	F	G
\$60,000	0	\$0	\$8,972	17	\$152,524
\$60,000	0	\$0	\$8,972	5	\$44,860
		\$0			\$197,000

\$197,000

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (AxB)	(D) Plants per year ^a	(E) Technical person-hours per year (CxD)	(F) Management person-hours per year (Ex0.05)
Initial performance tests for Ea	180	1	180	0	0	0
Initial performance tests for Eb ^c	180	1	180	0	0	0
Review report of initial performance test for Ea	24	1	24	0	0	0
Review report of initial performance test for Eb ^c	24	1	24	0	0	0
Repeat performance test for Ea	12	1	12	0	0	0
Repeat performance test for Eb ^d	12	1	12	0	0	0
Report review for Ea						
Notification of construction	2	1	2	0	0	0
Notification of actual startup	2	1	2	0	0	0
Notification of initial test	2	1	2	0	0	0
Notification of CMS demonstration	12	1	12	0	0	0
Review of CEMS demonstration for Ea	96	1	96	0	0	0
Review excess emission reports for Ea						
No excess emission report ^e	8	1	8	13.6	108.8	5.44
Excess emission report ^f	2	1	2	3.4	6.8	0.34
Review quarterly appendix F reports for Ea ^g	0.5	4	2	17	34	1.7
Review quarterly compliance report for Ea	8	4	32	17	544	27.2
Review annual compliance tests for Ea	18	1	18	17	306	15.3
Report review for Eb ^d						
Notification of construction ^c	2	1	2	0	0	0
Notification of initial performance test ^c	8	1	8	0	0	0
Notification of CEMS demonstration ^c	5	1	5	0	0	0
Review CEMS demonstration for Eb ^c	40	1	40	0	0	0
Review semiannual excess emission reports for Eb ^h	12	2	24	5	120	6
Review of quarterly Appendix F reports for Eb ⁱ	5	4	20	5	100	5
Review annual compliance reports for Eb	5	1	5	5	25	1.25
Review siting requirements study for Eb ^c	24	1	24	0	0	0
TOTAL ANNUAL BURDEN AND COST (rounded)^j						1,430

Assumptions:

^a On average, EPA estimates 22 existing sources will be subject to the NESHAP, including 17 sources subject to Ea, and 5 sources subject to Eb (respondent) to startup in 2019 which will become subject to Subpart Eb.

^b This ICR uses the following labor rates: \$69.04 per hour for Managerial (GS-13, Step 1, \$43.15 + 60%); \$51.23 per hour for Technical labor (GS-11, Step 1, \$31.49 + 60%); \$27.73 per hour for Clerical (GS-6, Step 3, \$17.33 + 60%). The rates have been increased by 60 percent to account for the benefit packages.

^c Applies to new or reconstructed sources only.

^d We have assumed that 20 percent of the respondents will repeat performance test for Eb.

^e We have assumed that 80 percent of respondents will file an opacity report of no excess emission for Ea.

^f We have assumed that 20 percent of respondents will file an opacity report of excess emission for Ea.

^g We have assumed that 17 of the respondents will write the appendix F reports four times per year for Ea.

^h We have assumed that 5 of the respondents will be required to write semiannual excess emission report for Eb two times per year.

ⁱ We have assumed that 5 of the respondents will write the appendix F reports four times per year.

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

27.73

(G) Clerical person- hours per year (Ex0.1)	(H) 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
10.88	\$6,251.10
0.68	\$390.69
3.4	\$1,953.47
54.4	\$31,255.52
30.6	\$17,581.23
0	\$0
0	\$0
0	\$0
0	\$0
12	\$6,894.60
10	\$5,745.50
2.5	\$1,436.38
0	\$0
	\$71,500

to Eb. EPA estimates one plant

bor (GS-12, Step 3, \$32.02 + 60%), and
available to government employees.

Table 1b: Annual Respondent Burden and Cost Breakdown by Affected Sector– NSPS for Municipal Solid Waste (CFR Part 60, Subparts Ea and Eb) (Renewal)

Affected Sector	Number of Responses	Labor Hours			Labor Cost
		Reporting	Recordkeeping	Total	
Private	84	10,110	3,272	13,380	\$1,279,200
Public (State/Local/Tribal)	121	14,549	4,708	19,255	\$1,840,800
Total	205	24,659	7,980	32,600	3,120,000

*Assumes 59% of respondents are public sector owned by state or local entities and privately operated. The remainder are owned and operated by the private sector. There are no Federally-owned facilities.

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(BxC)+D$
Notification of initial performance test for Ea	0	0	N/A	0
Notification of CMS demonstration for Ea	0	0	N/A	0
Compliance reports for Ea	17	1	N/A	17
Opacity reports for Ea (no excess emission)	13.6	1	N/A	13.6
Opacity reports for Ea (excess emission)	3.4	1	N/A	3.4
Report of daily weight of municipal solid waste (MSW) and fuel for Ea	17	4	N/A	68
Appendix F reports for Ea	17	4	N/A	68
Notification of construction/reconstruction for Eb	0	1	N/A	0
Notification of initial performance test for Eb	0	1	N/A	0
Notification of CMS demonstration for Eb	0	1	N/A	0

Initial compliance reports for Eb	0	1	N/A	0
Annual compliance reports for Eb	5	1	N/A	5
Semiannual excess emission reports Eb	5	2	N/A	10
Appendix F quarterly reports for Eb	5	4	N/A	20
Initial report on site selection analysis for Eb	0	1	N/A	0
Public meetings and comment responses for Eb	0	1	N/A	0

Total

205

Combustors (40

Capital and O&M Cost
\$80,770
\$116,230
197,000

aining facilities

of facilities

	Ea	Eb	Total	Percent by Sector
Public-Owned	8	5	13	59%
Private-Owned	9	0	9	41%
	17	5	22	