

### ICR Summary Information

|                              |          |
|------------------------------|----------|
| Hours per Response           | 4.7      |
| Number of Respondents        | 13.7     |
| Total Estimated Burden Hours | 17       |
| Total Estimated Costs        | \$865    |
| Annualized Capital O&M       | \$0      |
| Total Annual Responses       | 3.6      |
| Form Number                  | 5900-603 |

**Table 1: Annual Respondent Burden and Cost – NESHAP for Publicly Owned Treatment V**

Labor Rates:

| Burden item   | A                           | B                                 | C  | D                                 |
|---|-----------------------------|-----------------------------------|--|-----------------------------------|
|   | Person-hours per occurrence | Annual occurrences per respondent | Person-hours per respondent per year (AxB) | Respondents per year <sup>a</sup> |
| 1. Applications   | N/A                         |                                   |  |                                   |
| 2. Surveys and studies  | N/A                         |                                   |  |                                   |
| 3. Reporting requirements   |                             |                                   |  |                                   |
| A. Familiarization with regulatory requirements <sup>c</sup>          | 0.5                         | 1                                 | 1  | 13.6                              |
| B. Required activities  |                             |                                   |  |                                   |
| Initial notification <sup>d</sup>                                     | 2                           | 1                                 | 2  | 0.33                              |
| Notification of compliance status <sup>d</sup>                        | 2                           | 1                                 | 2  | 0.33                              |
| C. Create information   | See 3B                      |                                   |  |                                   |
| D. Gather existing information  | See 3B                      |                                   |  |                                   |
| E. Write reports  |                             |                                   |  |                                   |
| Request for extension of compliance                                   | 2                           | 1                                 | 2  | 0.33                              |
| Notification of special compliance requirements                       | 2                           | 1                                 | 2  | 0.33                              |
| Notification of performance test <sup>d</sup>                         | N/A                         |                                   |  |                                   |
| Additional notification requirements for source with CMS <sup>d</sup> | N/A                         |                                   |  |                                   |
| Notification of adjustments to time periods                           | 2                           | 1                                 | 2  | 0.33                              |
| Notification of changes to information provided                       | 2                           | 1                                 | 2  | 0.33                              |
| 30-day notification of excess emissions <sup>d</sup>                  | 1                           | 1                                 | 1  | 0.33                              |
| Performance test report <sup>d</sup>                                  | N/A                         |                                   |  |                                   |
| Inspection and monitoring plan <sup>d</sup>                           | 2                           | 1                                 | 2  | 0.33                              |
| Annual report <sup>d</sup>  | 1                           | 1                                 | 1  | 0.33                              |
| Annual excess emissions report <sup>d</sup>                           | 2                           | 1                                 | 2  | 0.33                              |
| Initial report on compliance approach <sup>d,e</sup>                  | 2                           | 1                                 | 2  | 0.33                              |
| <b>Reporting Subtotal</b>   |                             |                                   |  |                                   |
| 4. Recordkeeping  |                             |                                   |  |                                   |
| A. Familiarization with regulatory requirements                       | See 3A                      |                                   |  |                                   |
| B. Plan activities  | See 3E                      |                                   |  |                                   |
| C. Implement activities   | See 3E                      |                                   |  |                                   |
| D. Develop record system  | See 3E                      |                                   |  |                                   |
| E. Time to enter information  |                             |                                   |  |                                   |
| Records of annual inspections <sup>d</sup>                            | 2                           | 1                                 | 2  | 0.33                              |
| Records of inspections, defects, and repair delays <sup>d</sup>       | 2                           | 1                                 | 2  | 0.33                              |
| F. Time to transmit or disclose information                           | N/A                         |                                   |  |                                   |

|  |     |  |  |  |
|--|-----|--|--|--|
| G. Time to train personnel                                   | N/A |  |  |  |
| H. Time for audits   | N/A |  |  |  |
| <b>Recordkeeping Subtotal</b>                                |     |  |  |  |
| <b>TOTAL LABOR BURDEN AND COSTS (rounded)<sup>f</sup></b>    |     |  |  |  |
| <b>TOTAL CAPITAL AND O&amp;M COSTS (rounded)<sup>f</sup></b> |     |  |  |  |
| <b>GRAND TOTAL (rounded)<sup>f</sup></b>                     |     |  |  |  |

CMS - Continuous Monitoring System

N/A - Not Applicable

**Assumptions:**

<sup>a</sup> EPA estimates approximately 13 existing sources and one new/reconstructed source will be subject to the standard

<sup>b</sup> This ICR uses the following labor rates for publicly owned facilities: \$52.37 (technical), \$70.56 (managerial), and Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of pay. The rates have been in available to government employees.

<sup>c</sup> This burden represents the time existing respondents spend familiarizing themselves with the regulatory requirements

<sup>d</sup> New sources must install covers and controls, or comply with the HAP fraction emitted standard. Assumes one new source using the HAP fraction emitted standard over the next three years, utilizing a combination of pretreatment and wastewater performance standard. This compliance option does not require performance testing or a CMS, but does require initial

<sup>e</sup> The NESHAP specifies that existing facilities are subject to the initial report; however, all existing facilities previously submit an initial report.

<sup>f</sup> Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.

**Works (40 CFR Part 63, Subpart VVV) (Renewal)**

\$52.37      \$70.56      \$28.34

| <b>E</b>                               | <b>F</b>                                  | <b>G</b>                                | <b>H</b>                             |
|--|---|---|--------------------------------------|
| <b>Technical hours per year (Cx D)</b> | <b>Management hours per year (Ex0.05)</b> | <b>Clerical hours per year (Ex0.10)</b> | <b>Annual cost (\$) <sup>b</sup></b> |
|  |   |   |                                      |
|  |   |   |                                      |
|  |   |   |                                      |
| 7                                      | 0.3                                       | 0.7                                     | \$400.41                             |
|  |   |   |                                      |
| 0.66                                   | 0.03                                      | 0.07                                    | \$38.66                              |
| 0.66                                   | 0.03                                      | 0.07                                    | \$38.66                              |
|  |   |   |                                      |
|  |   |   |                                      |
| 0.66                                   | 0.03                                      | 0.07                                    | \$38.66                              |
| 0.66                                   | 0.03                                      | 0.07                                    | \$38.66                              |
|  |   |   |                                      |
|  |   |   |                                      |
| 0.66                                   | 0.03                                      | 0.07                                    | \$38.66                              |
| 0.66                                   | 0.03                                      | 0.07                                    | \$38.66                              |
|  |   |   |                                      |
|  |   |   |                                      |
| 0.66                                   | 0.03                                      | 0.07                                    | \$38.66                              |
| 0.66                                   | 0.03                                      | 0.07                                    | \$38.66                              |
|  |   |   |                                      |
|  |   |   |                                      |
| 0.33                                   | 0.02                                      | 0.03                                    | \$19.54                              |
|  |   |   |                                      |
| 0.66                                   | 0.03                                      | 0.07                                    | \$38.66                              |
| 0.33                                   | 0.02                                      | 0.03                                    | \$19.54                              |
| 0.66                                   | 0.03                                      | 0.07                                    | \$38.66                              |
| 0.66                                   | 0.03                                      | 0.07                                    | \$38.66                              |
| <b>15.4</b>                            |   |   | <b>\$787.43</b>                      |
|  |   |   |                                      |
|  |   |   |                                      |
|  |   |   |                                      |
|  |   |   |                                      |
|  |   |   |                                      |
|  |   |   |                                      |
| 0.66                                   | 0.03                                      | 0.07                                    | \$38.66                              |
| 0.66                                   | 0.03                                      | 0.07                                    | \$38.66                              |
|  |   |   |                                      |

| <b>Source Type</b>  | <b>No.</b> |
|---------------------|------------|
| Existing            | 13.3       |
| New (other sectors) | 0.33       |

|            |  |  |                |
|------------|--|--|----------------|
|            |  |  |                |
|            |  |  |                |
| <b>1.5</b> |  |  | <b>\$77.32</b> |
| <b>17</b>  |  |  | <b>\$865</b>   |
|            |  |  | <b>\$0</b>     |
|            |  |  | <b>\$865</b>   |

over the three-year period of this ICR.

\$28.34 (clerical). These rates are from the Office of increased by 60 percent to account for the benefit packages

nts.

v/reconstructed source will demonstrate compliance water treatment plant modifications to achieve this il notifications, monitoring, recordkeeping and reporting.

usly submitted the required information, so none will

**Agency Rates**

Source: Office of Personnel Management (OPM), 2022 General Schedule

| <u>Labor Type</u>        | <u>Total Compensation (\$/hr)</u> | <u>44.1</u> |
|--------------------------|-----------------------------------|-------------|
| (GS- 13, step 5) - Mgmt. | 44.1                              | \$70.56     |
| (GS- 12, step 1) - Tech. | 32.73                             | \$52.37     |
| (GS-6, step 3) - Cler.   | 17.71                             | \$28.34     |

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Publicly Owned Treatment Work**

Labor Rates: \$52.37

| Burden item  | A                               | B                                 | C  | D                                 | E                               |
|--|---------------------------------|-----------------------------------|--|-----------------------------------|---------------------------------|
|  | EPA person-hours per occurrence | Annual occurrences per respondent | EPA person-hours per respondent per year (AxB) | Respondents per year <sup>a</sup> | Technical hours per year (Cx D) |
| Performance test <sup>c</sup>  | N/A                             |                                   |  |                                   |                                 |
| Repeat performance test <sup>c</sup>                                   | N/A                             |                                   |  |                                   |                                 |
| Report review  |                                 |                                   |  |                                   |                                 |
| Initial notification   | 2                               | 1                                 | 2  | 0.33                              | 0.66                            |
| Notification of compliance status <sup>c</sup>                         | 2                               | 1                                 | 2  | 0.33                              | 0.66                            |
| Request for extension of compliance                                    | 0.5                             | 1                                 | 1  | 0.33                              | 0.17                            |
| Notification of special compliance requirements <sup>c</sup>           | 2                               | 1                                 | 2  | 0.33                              | 0.66                            |
| Notification of performance test <sup>c</sup>                          | 2                               | 1                                 | 2  | 0                                 | 0                               |
| Additional notification requirements for sources with CMS <sup>c</sup> | 2                               | 1                                 | 2  | 0                                 | 0                               |
| Notification of adjustments to time periods <sup>c</sup>               | 2                               | 1                                 | 2  | 0.33                              | 0.66                            |
| Notification of changes to information provided                        | 2                               | 1                                 | 2  | 0.33                              | 0.66                            |
| 30-day notification of excess emissions                                | 2                               | 1                                 | 2  | 0.33                              | 0.66                            |
| Performance test report <sup>c</sup>                                   | 2                               | 1                                 | 2  | 0                                 | 0                               |
| Inspection and monitoring plan <sup>c</sup>                            | 2                               | 1                                 | 2  | 0.33                              | 0.66                            |
| Annual report <sup>c</sup>   | 1                               | 1                                 | 1  | 0.33                              | 0.33                            |
| Annual excess emissions report <sup>c</sup>                            | 1                               | 1                                 | 1  | 0.33                              | 0.33                            |
| Initial report on compliance approach <sup>c</sup>                     | 2                               | 1                                 | 2  | 0.33                              | 0.66                            |
| <b>TOTAL <sup>d</sup></b>  |                                 |                                   |  |                                   |                                 |

CMS - Continuous Monitoring System

N/A - Not Applicable

**Assumptions:**

<sup>a</sup> EPA estimates approximately 13 existing sources and one new/reconstructed source will be subject to the standard over the

<sup>b</sup> This ICR uses the following labor rates: \$52.37 (technical), \$70.56 (managerial), and \$28.34 (clerical). These rates are from (OPM), 2022 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account government employees.

<sup>c</sup> Existing sources have no notification and reporting activities under this NESHAP and demonstrate compliance with the rule that meet all requirements specified in the appropriate industrial NESHAP(s). New sources are subject to rule emission limits, performance testing, plan development, and reporting activities. There is one new source expected to be subject to these requirements.

<sup>d</sup> Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.

is (40 CFR Part 63, Subpart VVV) (Renewal)

\$70.56                  \$28.34

| F   | G                                       | H                                    |
|---|---|--------------------------------------|
| <b>Management hours per year (Ex0.05)</b> | <b>Clerical hours per year (Ex0.10)</b> | <b>Annual cost (\$) <sup>b</sup></b> |
|   |   |                                      |
|   |   |                                      |
| 0.03                                      | 0.07                                    | \$38.66                              |
| 0.03                                      | 0.07                                    | \$38.66                              |
| 0.01                                      | 0.02                                    | \$10.17                              |
| 0.03                                      | 0.07                                    | \$38.66                              |
| 0   | 0                                       | \$0                                  |
| 0   | 0                                       | \$0                                  |
| 0.03                                      | 0.07                                    | \$38.66                              |
| 0.03                                      | 0.07                                    | \$38.66                              |
| 0.03                                      | 0.07                                    | \$38.66                              |
| 0   | 0                                       | \$0                                  |
| 0.03                                      | 0.07                                    | \$38.66                              |
| 0.02                                      | 0.03                                    | \$19.54                              |
| 0.02                                      | 0.03                                    | \$19.54                              |
| 0.03                                      | 0.07                                    | \$38.66                              |
| <b>7</b>                                  |   | <b>\$359</b>                         |

**Agency Rates**

Source: Office of Personnel Management (OPM), 2022 General Schedule

|                          | Hourly Mean Wage | With Fringe & Overhead |
|--------------------------|------------------|------------------------|
| (GS- 12, step 1) - Tech. | 32.73            | \$52.37                |
| (GS- 13, step 5) - Mgmt. | 44.1             | \$70.56                |
| (GS-6, step 3) - Cler.   | 17.71            | \$28.34                |

: three-year period of this ICR.

m the Office of Personnel Management  
it for the benefit packages available to

e by operating treatment and control devices  
s, control requirements, and related  
irements over the three-year period of this



**Capital/Startup vs. Operation and Maintenance (O&M) Costs**

EPA expects the new/reconstructed source to demonstrate compliance using the HAP fraction emitted standard, utilizing a combination of pretreatment and wastewater treatment plant modifications to achieve this performance standard. No new control or monitoring equipment (CMS) is expected. The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance costs.

| <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<br>E=(BxC)+D |
| Initial notification                                      | 0.33                         | 1                          | 0   | 0.33                                       |
| Notification of compliance status                         | 0.33                         | 1                          | 0   | 0.33                                       |
| Request for extension of compliance                       | 0.33                         | 1                          | 0   | 0.33                                       |
| Notification of special compliance requirements           | 0.33                         | 1                          | 0   | 0.33                                       |
| Notification of performance test                          | 0                            | 1                          | 0   | 0  |
| Additional notification requirements for sources with CMS | 0                            | 1                          | 0   | 0  |
| Notification of adjustments to time periods               | 0.33                         | 1                          | 0   | 0.33                                       |
| Notification of changes to information provided           | 0.33                         | 1                          | 0   | 0.33                                       |
| 30-day notification of excess emissions                   | 0.33                         | 1                          | 0   | 0.33                                       |
| Performance test report                                   | 0                            | 1                          | 0   | 0  |
| Inspection and monitoring plan                            | 0.33                         | 1                          | 0   | 0.33                                       |
| Annual report   | 0.33                         | 1                          | 0   | 0.33                                       |
| Annual excess emissions report                            | 0.33                         | 1                          | 0   | 0.33                                       |
| Initial report on compliance approach                     | 0.33                         | 1                          | 0   | 0.33                                       |
|   |                              |                            | Total   | 3.6  |

CMS - Continuous Monitoring System

hrs/response: 4.7

Assumes the new/reconstructed source to demonstrate compliance using the HAP fraction emitted standard, utilizing a combination of pretreatment and wastewater treatment plant modifications to achieve this performance standard. This compliance option does not require performance testing or a CMS.

| <b>Number of Respondents</b> |                                  |                                       |   |   |
|------------------------------|----------------------------------|---------------------------------------|---|---|
|                              | Respondents That Submit Reports  |                                       | Respondents That Do Not Submit Any Reports  |   |
| Year                         | (A)<br>Number of New Respondents | (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 |
| 1                            | 0.33                             | 13                                    | 0   | 0   |
| 2                            | 0.33                             | 13.3                                  | 0   | 0   |
| 3                            | 0.33                             | 13.7                                  | 0   | 0   |
| Average                      | 0.33                             | 13.3                                  | 0   | 0   |

|                                 |
|---------------------------------|
|                                 |
|                                 |
| (E)<br>Number of<br>Respondents |
| (E=A+B+C-D)                     |
| 13.3                            |
| 13.7                            |
| 14.0                            |
| 13.7                            |