

ICR Summary Information

Hours per Response	156
Number of Respondents	13
Total Estimated Burden Hours	2,800
Total Estimated Costs	\$512,000
Annualized Capital O&M	\$176,000
Total Annual Responses	18

Table 1: Annual Respondent Burden and Cost – NSPS for Commercial and Industrial Solid Waste Treatment, Storage, and Landfill (CCLP) (Renewal)

Burden Item	(A) Technical person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical person-hours per respondent per year (C=AxB)	(D) Respondents per year ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
A. Familiarize with regulatory requirements ^{c, d}	16	1	16	13
B. Required Activities				
1) Initial requirements ^e				
a) Initial stack test and report (PM, dioxins/furans, opacity, HCl, Cd, Pb, Hg, CO, NO _x , and SO ₂)	24	1	24	0
b) Establish and teach operator qualification course	64	1	64	0
c) Obtain operator qualification	72	1	72	0
d) Establish operating parameters (maximum and minimum)	160	1	160	0
e) Continuous parameter monitoring initial costs (including by-pass stack) ^{d, f}	8	1	8	0
f) Initial review of site-specific information	See 3B			
2) Periodic requirements ^g				
a) Annual stack test and test report (PM, HCl, and opacity)	12	1	12	13
b) Annual refresher operator training course	12	1	12	13
c) Annual review of site-specific information	8	1	8	13
d) Continuous parameter monitoring (including by-pass stack) annual costs ^h	83	1	83	13
C. Create Information	See 3B			
D. Gather Information	See 3E			
E. Report Preparation				
1) Report prior to construction (includes siting analysis) ^e	160	1	160	0
2) Report prior to initial start-up ^{e, i}				
a) With site-specific parameter petition	6	1	6	0
b) Without site-specific parameter petition	14	1	14	0
3) Report of initial performance test	See 3B			
4) Siting analysis for new units only (establishes values for site-specific operating parameters) ^e	8	1	8	0
5) Waste management plan ^e	160	1	160	0

6) Annual Report				
a) Site-specific operating parameters	8	1	8	13
b) Emissions/parameter exceedances and malfunctions ^j	See 3E(9)			
c) Results of stack tests conducted during the year	See 3B			
d) Statement of no exceedances ^j	8	1	8	12
e) Documentation of use of by-pass stack	See 3B			
f) Documentation for periods when all qualified operators were unavailable for more than 8 hours	8	1	8	13
7) Status report for operators that are off-site for more than 2 weeks ^k	8	1	8	1
8) Corrective action summary for operators that are off-site for more than 2 weeks ^k	8	2	16	1
9) Semiannual report of emissions/parameter exceedances ^j	12	2	24	1
Subtotal for Reporting Requirements				
4. Recordkeeping Requirements				
A. Familiarize with regulatory requirements	See 3A			
B. Plan Activities	See 3B			
C. Implement Activities	See 3B			
D. Develop Record System	N/A			
E. Record Information				
1) Records of operating parameters	See 3B			
2) Records of periods for which minimum amount of data on operating parameters were not obtained ^j	0.5	52	26	1
3) Records of malfunction of the unit ^j	1.5	1	1.5	1
4) Records of exceedances of operating parameters ^j	1.5	1	1.5	1
5) Records of stack tests	See 3E			
6) Records of siting analysis	See 3E			
7) Records of persons who have reviewed operating procedures	1	1	1	13
8) Records of persons who have completed operator training	1	1	1	13
9) Records of persons who meet operator qualification criteria	1	1	1	13
10) Records of monitoring device calibration	See 3B			
11) Records of site-specific documentation	24	1	24	13
F. Personnel Training	See 3B			
G. Time for Audits	N/A			
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Costs (rounded)^l				
Total Capital and O&M Cost (rounded)^l				
Grand Total (rounded)^l				

Assumptions:

- ^a We estimate that 13 existing respondents and zero new respondents per year will be subject to the rule over the three-year period.
- ^b This ICR uses the following labor rates: Managerial \$157.61 (\$75.05 + 110%); Technical \$123.94 (\$59.02 + 110%); and Unskilled \$75.05. Source: United States Department of Labor, Bureau of Labor Statistics, September 2021, "Table 2. Civilian Workers, by occupation, by sex, race, and hispanic or latino ethnicity, 2019." The rates have been increased by 110 percent to account for varying industry wage rates and the addition of wages and benefits, including business expenses associated with hiring, training, and equipping their employees.
- ^c We assume that all respondents will have to familiarize themselves with the regulatory requirements each year.
- ^d Cost is incurred by a facility regardless of the number of affected units at the plant.
- ^e One-time only cost.
- ^f Based on memorandum titled "Revised Testing and Monitoring Options and Costs for Medical Waste Incinerators (MWIs)." MWIs have assumed \$500 and \$300 for planning and selection, respectively. $(\$500 + \$300) / \$100.23 \text{ per hour} = 8 \text{ hours}$.
- ^g Annual costs are not incurred until the second year that units are in operation.
- ^h We assume 83 technical labor hours for reporting, based on memorandum titled "Revised Testing and Monitoring Options Methodology and Assumptions," A-91-61, IV-B-66.
- ⁱ We assume that new sources will petition for site-specific parameters.
- ^j We assume that exceedances and malfunctions each will account for 10 percent of existing facilities. $10\% \times 13 \text{ facilities} = 1.3 \text{ exceedances}$ and 1.3 malfunctions .
- ^k We assume that 10 percent of facilities will not have a qualified operator available for more than two weeks at least once per year.
- ^l Totals have been rounded to 3 significant figures. Totals may not add exactly due to rounding.

aste Incineration Units (40 CFR Part 60, Subpart

(E) Technical hours per year (E=CxD)	(F) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.10)	(H) Total cost per year (\$) ^b
208	10.4	20.8	\$28,719.08
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
156	7.8	15.6	\$21,539.31
156	7.8	15.6	\$21,539.31
104	5.2	10.4	\$14,359.54
1079	54	107.9	\$148,980.23
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0

Labor Rates	
Management	\$157.61
Technical	\$123.94
Clerical	\$62.52

104	5.2	10.4	\$14,359.54
96	4.8	9.6	\$13,254.96
104	5.2	10.4	\$14,359.54
8	0.4	0.8	\$1,104.58
16	0.8	1.6	\$2,209.16
24	1.2	2.4	\$3,313.74
2,363			\$283,739
26	1.3	2.6	\$3,589.89
1.5	0.08	0.15	\$207.11
1.5	0.08	0.15	\$207.11
13	0.65	1.3	\$1,794.94
13	0.65	1.3	\$1,794.94
13	0.65	1.3	\$1,794.94
312	15.6	31.2	\$43,078.62
437			\$52,468
2,800			\$336,000
			\$176,000
			\$512,000

Hours/response:

156

ar period of this ICR.

d Clerical \$62.52 (\$29.77 + 110%). These rates are from the
onal and industry group." The rates are from column 1, "Total
al overhead business costs of employing workers beyond their

/Is) - Methodology and Assumptions," A-91-61, IV-B-66. We

ons and Costs for Medical Waste Incinerators (MWIs) -

; = 1 facilities. The remaining 12 facilities would submit a

e a year, and that two corrective action summaries will be

Table 2: Average Annual EPA Burden and Cost – NSPS for Commercial and Industrial Solid Waste Incinerators, Subpart CCCC (Renewal)

Burden Item	(A)	(B)	(C)	(D)	(E)
	EPA Hours per Occurrence	Number of Occurrences Per Respondent Per Year	EPA Hours Per Respondent Per Year (C=AxB)	Number of Respondents Per Year ^a	Technical Hours Per Year (E=CxD)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting Requirements					
A. Observe initial stack tests (PM, dioxins/furans, opacity, HCl, Cd, Pb, Hg, CO, NOx, and SO ₂) ^{c,d}	48	1	48	0	0
B. Create Information	N/A				
C. Gather Information	N/A				
D. Report Reviews					
1) Review control plan ^d	8	1	8	0	0
2) Review notification of final compliance ^d	8	1	8	0	0
3) Review waste management plan ^d	8	1	8	0	0
4) Review initial stack test report ^d	40	1	40	0	0
5) Review annual compliance report	8	1	8	13	104
6) Review semi-annual excess emission and parameter exceedance report	16	2	32	1	32
7) Review status reports and corrective action summary for operators off-site	4	2	8	1	8
F. Prepare annual summary report ^e	4	1	4	50	200
TOTAL (rounded)^f					

Assumptions:

^a We estimate that 13 existing respondents and zero new respondents per year will be subject to the rule over the three

^b This cost is based on the average hourly labor rate as follows: Managerial \$70.56 (GS-13, Step 5, \$44.10 + 60%); Technical \$32.73 + 60%); and Clerical \$28.34 (GS-6, Step 3, \$17.17 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2021 General locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

^c We estimate initial stack test observations will take 48 hours per plant.

^d One-time only cost.

^e We assume that each state (i.e., 50 respondents) will prepare an annual summary of progress for implementing state

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

ation (CISWI) Units (40 CFR Part

(F)	(G)	(H)
Management Hours Per Year (F=Ex0.05)	Clerical Hours Per Year (G=Ex0.1)	Total Costs, \$ ^b
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
5.2	10.4	\$6,108
1.6	3.2	\$1,879
0.4	0.8	\$470
10	20	\$11,746
396		\$20,200

Labor Rates	
Management	\$70.56
Technical	\$52.37
Clerical	\$28.34

-year period of this ICR.

Technical \$52.37 (GS-12, Step 1, percent of Technical hours, and Clerical pay Schedule, which excludes government employees.

plans.

Capital/Startup vs. Operation and Maintenance			
(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents ^a	Total Capital/Startup Cost, (B X C)
Wet Scrubber ^a	\$77,413	0	\$0
Totals (rounded) ^b			\$0

^a The total O&M cost is \$13,517, and includes the O&M cost of parameter monitoring equipment (\$211) and We estimate stack testing will require 125 contractor hours per respondent at a rate of \$106.45 per hour.

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

(O&M) Costs

(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M^b	Total O&M, (E X F)
\$13,517	13	\$175,721
		\$176,000

\$176,000

the contractor labor cost associated with annual stack testing (\$13,306).

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents ^a	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Preconstruction Report	0	1	0	0
Report prior to initial startup	0	1	0	0
Notification of initial performance test	0	1	0	0
Notification of initial CMS Demonstration	0	1	0	0
Report of initial performance test	0	1	0	0
Report established values for site-specific operating parameters	0	1	0	0
Waste management plan	0	1	0	0
Annual Report ^a	13	1	0	13
Deviation Report ^b	1	2	0	2
Qualified Operator Deviation Notification ^b	1	1	0	1
Qualified Operator Report ^b	1	2	0	2
			Total	18

^a We estimate 13 existing respondents have to submit annual reports.

^b We assume that these activities will apply to 10 percent of facilities.

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ^a	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents
1	0	13	0	0
2	0	13	0	0
3	0	13	0	0
Average	0	13	0	0

^a New respondents include sources with constructed, reconstructed, and modified affected facilities.

(E)
Number of Respondents (E=A+B+C-D)
13
13
13
13