

Information Collection Request (ICR) Supporting Statement A

EXECUTIVE SUMMARY

Title: NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) (Renewal)

EPA ICR Number: 2369.06

OMB Control Number: 2060-0658

Abstract

The New Source Performance Standards (NSPS) for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL) were proposed on October 14, 2010; and promulgated on March 21, 2011. These regulations apply to new facilities with one or more sewage sludge incineration (SSI) units. New facilities are those that commenced construction after October 14, 2010 or commenced modification after September 21, 2011. Physical or operational changes made to the SSI unit to comply with the SSI Emission Guidelines at 40 CFR Part 60, Subpart M MMM do not qualify as a modification under this NSPS. This information is being collected to assure compliance with 40 CFR Part 60, Subpart LLLL.

In general, all NSPS standards 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 during 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 NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least two years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where either the delegated state or local authority can review them. If there is no such delegated authority, the EPA's regional offices can review them. All other reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the EPA's regional offices. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority, such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

The "Affected Public" are owners or operators of Sewage Sludge Incineration (SSI) facilities. The "burden" to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Incineration Units (Renewal). The "burden" to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Incineration Units (Renewal). There are

approximately 11 SSI facilities subject to these regulations, which are owned and operated by municipalities and local government. The burden to facilities owned by the Federal government and subject to this subpart is attributed to work performed by Federal government contractors. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there are an average of 6 affected units 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-year period, EPA estimates a total of 2 new sources and 1 modified source will become subject to these same standards, for an average of 1 new source per year. The overall average number of respondents is 11 per year. Each SSI facility has an average of 6 incinerator units onsite. These estimates are based on EPA's 2016 SSI Inventory.¹ The number of respondents has been updated from the prior ICR based on the estimated growth rate, as EPA identified no additional changes to industry growth or decline through consultations, public comment, or internal Agency knowledge. The estimated growth rate assumptions have also been retained for the three-year period of this ICR.

The active (previous) ICR had the following Terms of Clearance (TOC):

“Upon renewal of this collection, OMB requests that EPA submit the following as supplemental documents: the regulatory text that includes the ICR and the regulatory text that includes the submission instructions. Please also update to the standard 18 question SS-A format upon renewal.”

We updated this ICR to the standard 18 question format. We have created a supplementary document with this ICR renewal containing the requested regulatory text. Additionally, the method of submission is described in Section 4 below.

SUPPORTING STATEMENT A

1. NEED AND AUTHORITY FOR THE COLLECTION

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

... application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.

¹ For further information, see: <https://www.regulations.gov/document/EPA-HQ-OAR-2012-0319-0020>.

Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years.

In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act 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_x), sulfur dioxide (SO₂), cadmium, lead, and fugitive emissions from sewage sludge incineration units either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart LLLL.

2. PRACTICAL UTILITY/USERS OF THE DATA

The recordkeeping and reporting requirements in these 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 these same 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 the standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of these 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 these standards are being met. The performance test may also be observed.

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

Additionally, the EPA is requiring electronic reporting for certain notifications or reports. The EPA is requiring that owners or operators of affected sources would submit electronic copies of Relative Accuracy Test Audit (RATA) and performance test data 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 performance tests. The EPA is also requiring that 40 CFR Part 60, Subpart LLLL performance test reports be submitted through the EPA's ERT.

3. USE OF TECHNOLOGY

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.

Respondents are required to use the EPA's Electronic Reporting Tool (ERT) to develop performance test reports and submit them 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/>). 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. Respondents are also required to submit electronic copies of reference method and performance test data through EPA's CEDRI. For purposes of this ICR, it is assumed that there is no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically.

Electronic copies of records may also be maintained 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>.

4. EFFORTS TO IDENTIFY DUPLICATION

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as for state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for either reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, 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 either the delegated state or local agency. If a state or local agency has adopted its own 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.

5. MINIMIZING BURDEN ON SMALL ENTITIES

There are no small entities (i.e., small businesses) affected by this regulation. This NSPS does not contain any provisions reserved exclusively for the benefit of small entities. However, the NSPS does 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) for all pollutants, except for CO. The Agency considers these to be the minimum requirements needed to ensure compliance.

6. EFFECTS OF LESS FREQUENT COLLECTION

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet the 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.

7. 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. The 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.

8. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (88 FR 31748) on May 18, 2023. No comments were received on the notice published in the *Federal Register* for this renewal.

8b. 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 11 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade association(s) 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 Association of Clean Water Agencies, at (202) 833-2672, and the Water Environment Federation, at 1-800-666-0206.

9. PAYMENTS OR GIFTS TO RESPONDENTS

No payments of gifts are provided to respondents.

10. PROVISIONS FOR PROTECTION OF INFORMATION

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).

11. JUSTIFICATION FOR SENSITIVE QUESTIONS

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

12. ESTIMATE OF RESPONDENT BUDEN HOURS & LABOR COSTS

12a. Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements are owners and operators of sewage sludge incineration units. The North American Industry Classification System (NAICS) codes for the respondents affected by the standards are listed in the following table:

Standard (40 CFR Part 60, Subpart LLLL)	NAICS Codes
Sewage Treatment Facilities	221320
Solid Waste Combustors and Incinerators	562213

12b. Information Requested

In this ICR, all the data that are recorded or reported is required by the NSPS for Sewage Sludge Incineration Units (40 CFR Part 60, Subpart LLLL).

A source must make the following reports:

Notifications	
Notification of intent to construct, including anticipated date of commencement of construction, documentation for siting requirements, and anticipated date of initial startup.	§60.7(a), §60.4915(a)
Notification of actual startup, including maximum design dry sewage sludge burning capacity, anticipated maximum feed rate, petition for site-specific operating limits if applicable, and site-specific monitoring plan.	§60.7(a), §60.4915(b)
Notification of intent to start or stop use of a CMS.	§60.7(a), §60.4915(h)(1)
Notification of performance test.	§60.8(d), §60.4915(h)

Notifications	
	(2)
Notification to reschedule performance test.	§60.8(d), §60.4915(h) (3)

Reports	
Initial compliance report, no later than 60 days after initial performance test.	§60.7(a), §60.4915(c)
Annual compliance report.	§§60.7(c)-(d), §60.4915(d)
Deviation report if operating limits or emission limits are exceeded.	§§60.7(c), §60.4915(e)
Qualified operator deviation report.	§60.4915(f)
Report of force majeure event occurrences.	§60.8(a), §60.4915(g)
RATA (reference method) and performance test data (electronic submission).	§60.4915(i)
Performance test reports (electronic submission).	§60.4915(i)

A source must keep the following records:

Recordkeeping	
Maintain all records for five years.	§60.4910
Record calendar date of each record.	§60.7(f), §60.4910(a)
Maintain records of documentation of siting requirements.	§60.4910(b)
Maintain records of site-specific information and incinerator operation procedures and the names of persons who have completed review of this information.	§60.4910(c)(1)
Maintain records of names of persons who have completed the operator training requirements, including documentation of the training and the dates of the training.	§60.4910(c)(2)
Maintain records showing the periods when no qualified operators were accessible for more than 8 hours, but less than two weeks.	§60.4910(c)(3)
Maintain records showing the periods when no qualified operators were accessible for two weeks or more.	§60.4910(c)(4)
Maintain records of control device inspections.	§60.7(f), §60.4910(d)

Recordkeeping	
Maintain records of initial performance tests, annual performance tests, and any subsequent performance tests.	§60.7(f), §60.8(d), §60.4910(e)
Maintain records of all continuous monitoring data; includes continuous emissions monitors, continuous automated sampling systems, and continuous parameter monitors.	§§60.7(b)-(c), §60.7(f), §60.4910(f)
Maintain records of other information for continuous monitoring systems.	§§60.7(b)-(c), §60.7(f), §60.4910(g)
Maintain records of days when a deviation from the operating or emission limits have occurred, including a description of the deviation and a description of the corrective actions taken.	§60.7(b), §60.7(f), §60.4910(h), §§60.4915(e)-(f)
Maintain equipment vendor specifications for the incinerator, emission controls, and monitoring equipment.	§60.7(f), §60.4910(i)
Maintain records of calibration of any monitoring devices.	§60.7(f), §60.4910(j)
Maintain records of monitoring plan and performance evaluations.	§60.7(f), §60.4910(k)
Maintain records of less frequent testing.	§60.4910(l)
Maintain records of use of bypass stack.	§60.4910(m)

12c. Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for carbon monoxide, perform Method 22 test for opacity, and maintain operating parameters established during performance tests for your wet scrubber, fabric filter, electrostatic precipitator, or activated carbon injection.
Perform initial performance test, Reference Method 1, 3A or 3B, 5, 6 or 6C, 7 or 7E, 10, 10A, or 10B, 19, 22, 23, 26, 26A, 29, 30B test, 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.

Respondent Activities
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.

12d. Respondent Hour and Labor Burden

Table 1 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.

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 1,800 (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously-approved ICR, and any comments received.

This ICR uses the following labor rates: This cost is based on the average hourly labor rate as follows:

Managerial	\$73.46 (GS-13, Step 5, \$45.91 + 60%)
Technical	\$54.51 (GS-12, Step 1, \$34.07 + 60%)
Clerical	\$29.50 (GS-6, Step 3, \$18.44 + 60%)

These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

Based on our research for this ICR, on average over the next three years, approximately 10 existing respondents will be subject to these standards. It is estimated that 1 additional respondent per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 11 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	1	9	0	0	10
2	1	10	0	0	11
3	1	11	0	0	12
Average	1	10	0	0	11

^a New respondents include sources with constructed, reconstructed and modified affected facilities. We assume there will be 2 new sources and 1 modified source over the next three years, averaging to an estimated growth rate of 1 new respondent per year. This industry growth estimate is based on EPA's 2016 SSI Inventory for the Federal Plan (see Appendix A at <https://regulations.gov/document/EPA-HQ-OAR-2012-0319-0020>) and adjusted to reflect the estimated growth rate.

^b Estimates of the number of existing sources are based on the previous ICR (2369.05) and EPA's 2016 SSI Inventory.

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 11.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of Construction	1	1	0	1
Notification of Start-up	1	1	0	1
Notification of Initial Performance Test	1	1	0	1
Notification of Initial CMS Demonstration	1	1	0	1
Initial Compliance Report	1	1	0	1
Annual Compliance Report ^a	10	1	0	10
Status report for operators that are	1	1	0	1

Total Annual Responses				
off-site for more than 2 weeks ^b				
Corrective action summary for operators that are off-site for more than 2 weeks ^b	1	2	0	2
Semiannual Deviation Report ^c	1	2	0	2
			Total (rounded)	20

^a Facilities may test every three years if certain requirements are met, and it is assumed most facilities would meet the requirements. However, all facilities must submit annual compliance reports.

^b 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 further assume this would require only two corrective action summaries.

^c We assume that 10 percent of the existing facilities ($10 * 0.1 = 0.9$) have excess emissions and submit semiannual deviation reports.

The number of Total Annual Responses is 20.

The total annual labor costs are \$95,700. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Incineration Units (Renewal).

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

The total annual labor hours are 1,800 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Incineration Units (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 90 hours per response.

13. ESTIMATED RESPONDENT ANNUAL NON-LABOR COST (CAPITAL AND O&M)

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 monitor(s) and such other costs as photocopying and postage.

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
CEMS/CPMS ^b	\$321,842	1	\$321,842	\$115,097	10	\$1,150,966
Stack testing ^c	\$87,000	1	\$87,000	\$87,000	3.3	\$287,100
Filing cabinet ^d	\$100	1	\$100			
Total ^e			\$409,000			\$1,440,000

^a We assume that there are 7 existing SSI facilities with an average of 6 incinerator units. Burden estimates are based on a "per respondent" basis, not a "per unit" basis. We assume that there will be a total of 2 new sources and 1 modified source over the next three-year period, averaging in an estimated growth rate of 1 new respondent per year. The estimate for the number of facilities subject to NSPS Subpart LLLL is based on EPA's 2016 SSI Inventory for the Federal Plan (See Appendix A at <https://www.regulations.gov/document/EPA-HQ-OAR-2012-0319-0020>) and adjusted to reflect the estimated growth rate.

^b Based on estimated monitoring costs provided in Table 1 from the Supporting Statement for the Standards of Performance for New Stationary Sources: Sewage Sludge Incineration (SSI) Units (Subpart LLLL) from the March 21, 2011 final rule (see <https://www.regulations.gov/document/EPA-HQ-OAR-2009-0559-0168>). Monitoring costs have been updated from 2008 to 2022 values using the CEPCI CE Index.

^c Total estimated cost for initial stack test, including Method 5 (PM), Method 9 (opacity), Method 10 (CO), Method 26 (HCl), Method 29 (metals), Method 23 (CDD/CDF), Method 7E (NO_x), Method 6C (SO₂), and visible emissions testing are from "Burden Estimate Tables - Standards of Performance for New Stationary Sources Sewage Sludge Incineration (SSI) Units (Subpart LLLL)" spreadsheet at <https://www.regulations.gov/document/EPA-HQ-OAR-2009-0559-0168>. Testing costs have been updated to 2022 dollars using the CEPCI CE Index. Existing facilities may test every three years if certain requirements are met, and it is assumed that all facilities would meet the requirements. Thus, on average 3.3 existing sources per year (10 x 0.33 = 3.3) perform annual testing following the initial performance test.

^d Assumed \$100 for purchase of filing cabinet to store copy of rule, records, and report copies.

^e 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 \$409,000. This is the total of column D in the above table. The total operation and maintenance (O&M) costs for this ICR are \$1,440,000. 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 \$1,850,000. These are the recordkeeping costs.

14. AGENCY BURDEN ESTIMATES

The EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

Agency Activities

Attend performance tests.
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.

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 \$20,800.

This cost is based on the average hourly labor rate as follows:

Managerial	\$73.46 (GS-13, Step 5, \$45.91 + 60%)
Technical	\$54.51 (GS-12, Step 1, \$34.07 + 60%)
Clerical	\$29.50 (GS-6, Step 3, \$18.44 + 60%)

These rates are from the Office of Personnel Management (OPM), 2023 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 – NSPS for Sewage Sludge Incineration Units (Renewal).

The average annual Agency burden and cost over the next three years is estimated to be 381 labor hours at a cost of \$20,800; see below in Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Incineration Units (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.

15. CHANGE IN BURDEN

The increase in burden from the most-recently approved ICR is due to an increase in the number of new or modified sources. There is also an increase in costs due to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report

(September 2022) to calculate respondent burden costs. This ICR also adjusts the capital/startup and operation and maintenance costs from 2008 to 2022 values using the CEPCI CE Index.

16. PUBLICATION OF DATA

All non-CBI data submitted electronically to the Agency through CEDRI are available to the public for review and printing and are accessible using WebFIRE. Electronically submitted emissions data from performance testing or performance evaluations using the Electronic Reporting Tool or templates attached to CEDRI, as well as data from reports from regulations with electronic templates, are tabulated; data submitted as portable document format (PDF) files attached to CEDRI are neither tabulated nor subject to complex analytical techniques. Electronically submitted emissions data used to develop emissions factors undergo complex analytical techniques and the draft emissions factors are available on the Clearinghouse for Inventories and Emission Factors listserv at <https://www.epa.gov/chief/chief-listserv> for public review and printing. Electronically submitted emissions data, as well as other data, obtained from one-time or sporadic information collection requests often undergo complex analytical techniques; results of those activities are included in individual rulemaking dockets and are available at <https://www.regulations.gov/> for public review and printing.

17. DISPLAY OF OMB CONTROL NUMBER AND EXPIRATION DATE ON INSTRUMENTS

The Agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. CERTIFICATION STATEMENT

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.

Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Incineration Units (Renewal)

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with regulation requirements								
1) New sources ^c	40	1	40	1	40	2	4	\$2,445.42
2) Existing sources ^d	4	1	4	10	40	2	4	\$2,445.42
B. Required activities								
1) Initial stack test and report (new sources) ^c	40	1	40	1	40	2	4	\$2,445.42
2) Annual stack test and test report (existing sources) ^{d, e}	40	0.33	13.2	3.3	43.56	2.18	4.36	\$2,663.06
3) Operator training and qualification								
a) Establish and teach operator qualification course ^{c, f}	64	1	64	1	64	3	6	\$3,912.67
b) Obtain operator qualification ^{c, f}	10	1	10	1	10	0.5	1	\$611.35
c) Annual refresher course ^d	2	1	2	10	20	1	2.0	\$1,222.71
d) Initial review of site-specific information	See 3A							

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per responden t per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
e) Annual review of site-specific information (existing sources) ^d	8	1	8	10	80	4	8	\$4,890.83
4) Establish maximum and minimum operating parameters (new sources) ^c	40	1	40	1	40	2	4	\$2,445.42
5) Continuous parameter monitoring (including CEMS) ^d	11	1	11	10	110	5.5	11	\$6,724.89
C. Create Information	See 3B							
D. Gather Existing Information	See 3E							
E. Write report								
1) Notification of construction (includes siting analysis) ^c	160	1	160	1	160	8	16	\$9,781.66
2) Notification of start-up (includes monitoring plan) ^c	40	1	40	1	40	2	4	\$2,445.42
3) Notification of initial performance test ^c	2	1	2	1	2	0.1	0.2	\$122.27
4) Notification of initial CMS Demonstration ^c	2	1	2	1	2	0.1	0.2	\$122.27
5) Initial Compliance Report	40	1	40	1	40	2	4	\$2,445.42
6) Annual Compliance Report	40	1	40	10	400	20	40	\$24,454.16
7) Status report for operators that are off-site for more than 2 weeks ^g	8	1	8	1	8	0.4	0.8	\$489.08
8) Corrective action summary for operators that are off-site for	8	2	16	1	16	0.8	1.6	\$978.17

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
more than 2 weeks ^g								
9) Semiannual Deviation Report ^h	24	2	48	1	48	2.4	4.8	\$2,934.50
Subtotal for Reporting Requirements					1,384			\$73,580
4. Recordkeeping Requirements								
A. Familiarize with regulation requirements								
B. Plan activities	See 3A							
C. Implement activities:	N/A							
D. Develop record system	N/A							
E. Record Information	N/A							
1) Records of operating parameters	2	52	104	0	0	0	0	\$0
2) Records of exceedances of the operating parameters ^h	2	1	2	1	2	0.1	0.2	\$122.27
3) Records of stack tests	2	1	2	10	20	1	2	\$1,222.71
4) Records of siting analysis	2	1	2	10	20	1	2	\$1,222.71
5) Records of persons who have reviewed operating procedures	2	1	2	10	20	1	2	\$1,222.71
6) Records of persons who have completed operator training	2	1	2	10	20	1	2	\$1,222.71
7) Records of persons who meet operator qualification criteria	2	1	2	10	20	1	2	\$1,222.71

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
8) Records of monitoring device calibration	2	1	2	10	20	1	2	\$1,222.71
9) Records of site-specific documentation	24	1		10				
F. Time to train personnel	24	1	24	10	240	12	24	\$14,672.50
G. Time for audits	See 3B							
	N/A							
Subtotal for Recordkeeping Requirements						416		\$22,131
Total Labor Burden and Costs (rounded) ⁱ						1,800		\$95,700
Total Capital and O&M Cost (rounded) ⁱ								\$1,850,000
GRAND TOTAL (rounded) ⁱ								\$1,950,000

Assumptions:

^a We assume there are 10 existing facilities with 6 incineration units each. Burden estimates are based on a "per respondent" basis, not a "per unit" basis. We assume that there will be a total of 2 new sources and 1 modified source over the next three-year period, averaging to 1 new respondent per year. Estimates are based on EPA's 2016 SSI Inventory.

^b These rates are based on the average hourly labor rate as follows: Managerial \$73.46 (GS-13, Step 5, \$45.91 + 60%); Technical \$54.51 (GS-12, Step 1, \$34.07 + 60%); and Clerical \$29.50 (GS-6, Step 3, \$18.44 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

^c One-time only costs for new sources.

^d Annual Costs for existing sources. Annual costs are not incurred until the second year of operation.

^e Existing facilities may test every three years if certain requirements are met, and it is assumed that all facilities would meet the requirements. Thus, on average

3.3 existing sources per year ($10 \times 0.33 = 3.3$) perform annual testing following the initial performance test.

^f Costs incurred by a facility regardless of the number of affected units at the plant.

^g 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 further assume that this would require only two corrective action summaries.

^h We assume that 10 percent of the facilities would have an exceedance during the year.

ⁱ Totals are rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Incineration Units (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C = AxB)	(D) Respondents per year ^a	(E) Technical person hours per year (E = CxD)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Cost, \$ ^b
1. Applications	N/A							
2. Required Activities								
A. Observe stack tests ^c	48	1	48	0.65	30.96	1.55	3.10	\$2,450.05
B. Excess emissions - Enforcement activities	24	1	24	1	24	1.20	2.40	\$1,467.25
C. Create Information	N/A							
D. Gather Information	N/A							
E. Report Reviews								
1) Review initial notifications ^d	40	2	80	1	80	4	8	\$4,890.83
2) Review initial compliance report	40	1	40	1	40	2	4	\$2,445.42
3) Review annual compliance report	8	1	8	10	80	4	8	\$4,890.83
4) Review semi-annual excess emission and parameter exceedance report	16	2	32	1	32	2	3.2	\$1,956.33
5) Review status reports and corrective action summary for operators off-site	4	1	4	1	4	0.2	0.4	\$244.54
F. Prepare annual summary report ^e	4	1	4	10	40	2.0	4	\$2,445.42

TOTAL (rounded) ^h		381	\$20,800
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Assumptions:

^a We assume there are 10 existing facilities with 6 incineration units each. Burden estimates are based on a "per respondent" basis, not a "per unit" basis. We assume that there will be a total of 2 new sources and 1 modified source over the next three-year period, averaging to 1 new respondent per year. Estimates are based on EPA's 2016 SSI Inventory.

^b These rates are based on the average hourly labor rate as follows: Managerial \$73.46 (GS-13, Step 5, \$45.91 + 60%); Technical \$54.51 (GS-12, Step 1, \$34.07 + 60%); and Clerical \$29.50 (GS-6, Step 3, \$18.44 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

^c Assumes EPA personnel attend 15 percent of the stack tests. New facilities do stack testing. Existing facilities may test every three years if certain requirements are met, and it is assumed that all facilities would meet the requirements. $((1 \text{ new facility} + (10 \text{ existing facilities} \times 0.33)) \times 0.15) = 0.65 \text{ tests observed per year}$

^d Includes notification of construction, notification of start-up for new units, notification of initial performance test, and notification of initial CMS demonstration.

^e We assume four hours per state to write annual summary report.

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

^g We assume that it will take the agency 15 hours to review the semiannual reports and that the agency will review summary reports twice per year.

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