

ATTACHMENT 1
SUPPORTING STATEMENT

**National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustion
CFR Part 63, Subpart EEE) (Proposed Rule)**

TABLES 1, 2, and 3

Annual Respondent Burden and Cost of the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustion Exemptions and e-Reporting (40 CFR Part 63, Subpart EEE) (Proposed Rule) – (a) Publicly Owned and Operated

TABLE 4

Summary of Annual Respondent Burden and Cost of the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustion Malfunction Exemptions and e-Reporting (40 CFR Part 63, Subpart EEE) (Proposed Rule)

TABLES 5, 6, and 7

Annual Agency Burden and Cost of the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustion Exemptions and e-Reporting (40 CFR Part 63, Subpart EEE) (Proposed Rule) – Years 1-3

TABLE 8

Summary of Annual Agency Burden and Cost of the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustion Malfunction Exemptions and e-Reporting (40 CFR Part 63, Subpart EEE) (Proposed Rule)

TABLE 9

Burden Reduction due to e-reporting calculation

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Combustors Removal of Malfunction Exemptions and e-Reporting (40 CFR Part 261.10)

Exemptions from Hazardous Waste Combustors Removal of Malfunction
for (b) Privately Owned; Years 1-3

Exemptions for Air Pollutants from Hazardous Waste Combustors Removal of

Exemptions from Hazardous Waste Combustors Removal of Malfunction

Exemptions for Pollutants from Hazardous Waste Combustors Removal of

Industry Wages*

May 2022 National Industry-Specific Occupational Employment and Wage Estimates

NAICS 562200 - Waste Treatment and Disposal

Category	Occupation Code	Mean hourly rate (\$/hr)
Technical	17-2112	49.94
Management	11-9041	78.91
Clerical	43-9061	19.32

https://www.bls.gov/oes/current/naics4_562200.htm

*Labor rates are assumed to be comparable between private and public sector.

EPA Wages

	Hourly Mean Wage	With Fringe & Overhead
(GS- 12, step 1) - Tech.	34.07	\$54.51
(GS- 13, step 5) - Mgmt.	45.91	\$73.46
(GS-6, step 3) - Cler.	18.44	\$29.50

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/23Tables/html/GS_h.aspx

Facilities

	Number of Facilities	Number of Units
Existing	96	177
Proposed or unopened	0	4
<i>Municipality Owned*</i>	0	0
<i>Privately Owned*</i>	96	181

Number of sister units

23

Fringe Benefit Loading Rate	Overhead and Profit Rate	Loaded Rate (\$/hr)
1.5	1.4	104.87
1.5	1.4	165.71
1.5	1.4	40.57

Table 1: Annual Privately Owned Respondent Burden and Cost Year One - National Emission & Pollutants from Hazardous Waste Combustors Removal of Malfunction Exemptions and e-Repo (Proposed Rule)

\$104.87

Burden item ^a	(A)	(B)	(C)	(D)	(E)
	Person-hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)	Respondents per year ^b	Technical hours per year (E=CxD)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting requirements					
A. Familiarize with regulatory requirements	4	1	4	96	384
B. Required activities					
Initial performance test	N/A				
Repeat performance test	N/A				
CEMS demonstration	15	1	15	96	1440
Annual performance test	N/A				
C. Write report					
Notifications (construction/modification, start-up, initial/repeat performance test, CEMS demonstration, CEMS start/stop, exemptions)	5	1	5	96	480
Performance test reports (initial/repeat and annual compliance)	0.5	1	0.5	96	48
CEMS demonstration report	N/A				
Familiarize with CEDRI	4	1	4	96	384
Electronic data submittal	0.5	3	1.5	96	144
Subtotal for Reporting Requirements	29	8			
4. Recordkeeping requirements					
Record startups, shutdowns, and malfunctions	N/A				
Records of all emission rates, computations, tests	0	0	0	96	0
Records of employee review of operations manual	4	3	12	96	1152
Records of operating parameters for control devices	0	0	0	96	0
Subtotal for Recordkeeping Requirements	4	3			
TOTAL LABOR BURDEN AND COST (rounded)	33	11			
TOTAL CAPITAL AND O&M COST (rounded)					

GRAND TOTAL (rounded)					
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Assumptions:

- a These burden estimates are intended to be incremental. Requirements already established for existing HWCs are indicated
- b There are 173 HWC units at 94 facilities, all of which are privately owned. We have assumed that there will be 1 new resource
- c Refer to Inputs for sources for wage data

**Standards for Hazardous Air
 Reporting (40 CFR Part 63, Subpart EEE)**

\$165.71 (F)	\$40.57 (G)	(H)
Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) ^c
19.2	38.4	\$45,011
72	144	\$168,792
24	48	\$56,264
2.4	4.8	\$5,626
19.2	38.4	\$45,011
7.2	14.4	\$16,879
3,312		\$337,584
0	0	\$0.00
57.6	115.2	\$135,034
0	0	\$0.00
1,325		\$135,034
4,637		\$472,600

		\$472,600
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d as N/A in column (A) and already accounted for in the current HWC rule's ICR.
pendent each year over the three-year period of this ICR.

Table 2: Annual Privately Owned Respondent Burden and Cost Year Two - National Emission of Pollutants from Hazardous Waste Combustors Removal of Malfunction Exemptions and e-Repo (Proposed Rule)

\$104.87

Burden item ^a	(A)	(B)	(C)	(D)	(E)
	Person-hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)	Respondents per year ^b	Technical hours per year (E=CxD)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting requirements					
A. Familiarize with regulatory requirements	N/A				
B. Required activities					
Initial performance test	N/A				
Repeat performance test	N/A				
CEMS demonstration	N/A				
Annual performance test	N/A				
C. Write report					
Notifications (construction/modification, start-up, initial/repeat performance test, CEMS demonstration, CEMS start/stop, exemptions)	5	1	5	97	485
Performance test reports (initial/repeat and annual compliance)	0.5	1	0.5	1	0.5
CEMS demonstration report					
Familiarize with CEDRI	1	1	1	97	97
Electronic data submittal	0.5	3	1.5	97	145.5
Subtotal for Reporting Requirements	7	6			
4. Recordkeeping requirements					
Record startups, shutdowns, and malfunctions	N/A				
Records of all emission rates, computations, tests	0	0	0	97	0
Records of employee review of operations manual	2	3	6	97	582
Records of operating parameters for control devices	0	0	0	97	0
Subtotal for Recordkeeping Requirements	2	3			
TOTAL LABOR BURDEN AND COST (rounded)	9	9			
TOTAL CAPITAL AND O&M COST (rounded)					

GRAND TOTAL (rounded)					
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Assumptions:

- a These burden estimates are intended to be incremental. Requirements already established for existing HWCs are indicated
- b There are 173 HWC units at 94 facilities, all of which are privately owned. We have assumed that there will be 1 new resource
- c Refer to Inputs for sources for wage data

**Standards for Hazardous Air
 Reporting (40 CFR Part 63, Subpart EEE)**

\$165.71 \$40.57

(F)	(G)	(H)
Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) ^c
24.25	48.5	\$56,850
0.025	0.05	\$59
4.85	9.7	\$11,370.02
7.275	14.55	\$17,055
837		\$85,334
0	0	\$0.00
29.1	58.2	\$68,220
0	0	\$0.00
669		\$68,220
1,507		\$153,600

		\$153,600
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d as N/A in column (A) and already accounted for in the current HWC rule's ICR.
pendent each year over the three-year period of this ICR.

Table 3: Annual Privately Owned Respondent Burden and Cost Year Three - National Emission Pollutants from Hazardous Waste Combustors Removal of Malfunction Exemptions and e-Repo (Proposed Rule)

\$104.87

Burden item ^a	(A)	(B)	(C)	(D)	(E)
	Person-hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)	Respondents per year ^b	Technical hours per year (E=CxD)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting requirements					
A. Familiarize with regulatory requirements	N/A				
B. Required activities					
Initial performance test	N/A				
Repeat performance test	N/A				
CEMS demonstration	N/A				
Annual performance test	N/A				
C. Write report					
Notifications (construction/modification, start-up, initial/repeat performance test, CEMS demonstration, CEMS start/stop, exemptions)	5	1	5	98	490
Performance test reports (initial/repeat and annual compliance)	0.5	1	0.5	1	0.5
CEMS demonstration report					
Familiarize with CEDRI	1	1	1	98	98
Electronic data submittal	0.5	3	1.5	98	147
Subtotal for Reporting Requirements	7	6			
4. Recordkeeping requirements					
Record startups, shutdowns, and malfunctions	N/A				
Records of all emission rates, computations, tests	0	0	0	98	0
Records of employee review of operations manual	2	3	6	98	588
Records of operating parameters for control devices	0	0	0	98	0
Subtotal for Recordkeeping Requirements	2	3			
TOTAL LABOR BURDEN AND COST (rounded)	9	9			
TOTAL CAPITAL AND O&M COST (rounded)					

GRAND TOTAL (rounded)					
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Assumptions:

- a These burden estimates are intended to be incremental. Requirements already established for existing HWCs are indicated
- b There are 173 HWC units at 94 facilities, all of which are privately owned. We have assumed that there will be 1 new resource
- c Refer to Inputs for sources for wage data

**Standards for Hazardous Air
Polluting (40 CFR Part 63, Subpart EEE)**

\$165.71 \$40.57

(F)	(G)	(H)
Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) ^c
24.5	49	\$57,436
0.025	0.05	\$59
4.9	9.8	\$11,487.24
7.35	14.7	\$17,231
846		\$86,213
0	0	\$0.00
29.4	58.8	\$68,923
0	0	\$0.00
676		\$68,923
1,522		\$155,100

		\$155,100
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d as N/A in column (A) and already accounted for in the current HWC rule's ICR.
pendent each year over the three-year period of this ICR.

Table 4 - Summary of Annual Respondent Burden and Cost - National Emission Standards for I

Year	Total Labor Hours	Labor Costs	Non-Labor (Capital/Startup and O&M) Costs
1	4,637	\$472,618	\$0
2	1,507	\$153,554	\$0
3	1,522	\$155,136	\$0
Annual Burden Reduction due to e-reporting			\$3,890
Total (rounded)	7,670	\$781,000	\$0
Average (rounded)	2,560	\$260,000	\$0

Hazardous Air Pollutants from Hazardous Waste Combustors Removal of Malfunction Exemptic

Total Costs (includes annual burden reduction)
\$468,728
\$149,664
\$151,246
\$770,000
\$257,000

ons and e-Reporting (40 CFR Part 63, Subpart EEE) (Proposed Rule)

Table 5: Average Annual EPA Burden and Cost Year One - National Emission Standards f

Burden item ^a	(A)	(B)	(C)
	Person-hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)
Applications	N/A		
Notification of construction/ modification	N/A		
Notification of actual startup	N/A		
New excessive exceedance reports received due to SSM change	4	1	4
Notification of initial/repeat performance test	N/A		
Notification of CEMS update	2	1	2
Initial performance test	N/A		
Repeat performance test	N/A		
Semiannual report	N/A		
TOTAL (rounded)			

Assumptions:

a These burden estimates are intended to be incremental. Requirements already established for existing HWCs are in

b There are 173 HWC units at 94 facilities, all of which are privately owned. We have assumed that there will be 1 n

c Refer to Inputs for sources for wage data

for Hazardous Air Pollutants from Hazardous Waste Combustors Removal

\$54.51 \$73.46 \$29.50

(D)	(E)	(F)	(G)	(H)
Respondents per year ^b	Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) ^c
96	384	19.2	38.4	\$23,476
96	192	9.6	19.2	\$11,738
		662		\$35,210

indicated as N/A in column (A) and already accounted for in the current HWC rule's ICR.
 new respondent each year over the three-year period of this ICR.

l of Malfunction Exemptions and e-Reporting (40 CFR Part 63, Subpart EEE)

) (Proposed Rule)

Table 6: Average Annual EPA Burden and Cost Year Two - National Emission Standards for

Burden item ^a	(A)	(B)	(C)	(D)
	Person-hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)	Respondents per year ^b
Applications	N/A			
Notification of construction/ modification	N/A			
Notification of actual startup	N/A			
New excessive exceedance reports received due to SSM change	4	1	4	97
Notification of initial/repeat performance test	N/A			
Notification of CEMS update	2	0	0	0
Initial performance test	N/A			
Repeat performance test	N/A			
Semiannual report	N/A			
TOTAL (rounded) ^d				

Assumptions:

a These burden estimates are intended to be incremental. Requirements already established for existing HWCs are included.

b There are 173 HWC units at 94 facilities, all of which are privately owned. We have assumed that there will be 1 new unit per facility.

c Refer to Inputs for sources for wage data

r Hazardous Air Pollutants from Hazardous Waste Combustors Removal of Malfunction Exen

\$54.51 \$73.46 \$29.50

(E)	(F)	(G)	(H)
Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) ^c
388	19.4	38.8	\$23,720
0	0	0	\$0.00
446			\$23,720

cated as N/A in column (A) and already accounted for in the current HWC rule's ICR.
 v respondent each year over the three-year period of this ICR.

ptions and e-Reporting (40 CFR Part 63, Subpart EEE) (Proposed Rule)

Table 7: Average Annual EPA Burden and Cost Year Three - National Emission Standards f

Burden item ^a	(A)	(B)	(C)	(D)
	Person-hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C=AxB)	Respondents per year ^b
Applications	N/A			
Notification of construction/ modification	N/A			
Notification of actual startup	N/A			
New excessive exceedance reports received due to SSM change	4	1	4	98
Notification of initial/repeat performance test	N/A			
Notification of CEMS update	2	0	0	0
Initial performance test	N/A			
Repeat performance test	N/A			
Semiannual report	N/A			
TOTAL (rounded) ^d				

Assumptions:

a These burden estimates are intended to be incremental. Requirements already established for existing HWCs are indi

b There are 173 HWC units at 94 facilities, all of which are privately owned. We have assumed that there will be 1 nev

c Refer to Inputs for sources for wage data

or Hazardous Air Pollutants from Hazardous Waste Combustors Removal of Malfunction Exe

\$54.51 \$73.46 \$29.50

(E)	(F)	(G)	(H)
Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.1)	Total cost per year (\$) ^c
392	19.6	39.2	\$23,965
0	0	0	\$0.00
451			\$23,960

cated as N/A in column (A) and already accounted for in the current HWC rule's ICR.
 v respondent each year over the three-year period of this ICR.

Exemptions and e-Reporting (40 CFR Part 63, Subpart EEE) (Proposed Rule)

Table 8: Summary of Annual Agency Burden and Cost of the National Emission Standards for Hazardous

Year	Total Hours	Labor Costs	Non-Labor Costs	Total Costs
1	662	\$35,210	\$0	\$35,210
2	446	\$23,720	\$0	\$23,720
3	451	\$23,960	\$0	\$23,960
Total (Rounded)	1,559	\$82,890	\$0	\$82,890
Average (Rounded)	520	\$27,630	\$0	\$27,630

As Air Pollutants from Hazardous Waste Combustors Removal of Malfunction Exemptions and e-Repo

ring (40 CFR Part 63, Subpart EEE) (Proposed Rule)

Total Other Direct Costs to respondents: Burden Reduction due to e-reporting

Activity	Number of Respondents	Pages per report	Total Printing Costs
Comprehensive Performance Test	154	100	\$1,540.00
Confirmatory Performance Test	154	50	\$770.00
Excess Emission-CMS report	97	20	\$194.00
Notifications and infrequent reports	97	5	\$40.50

Cost of paper	\$0.10 per page	From CrF supporting statement
Shipping costs	\$8.90 per package	From CrF supporting statement
Time between tests	2.5 years	
Total	\$3,890.00	

Total Shipping Costs	Time between submissions (years)	Total	Annual costs
\$1,370.60	5	\$2,910.00	\$582.00
\$1,370.60	5	\$2,140.00	\$428.00
\$863.30	0.5	\$1,060.00	\$2,120.00
\$720.90	1	\$760.00	\$760.00

Notes

The number of respondents is the difference between the number of units and number of sister units

Refer to above comment

Assume these are grouped and sent on a per company and not a per unit basis.

Assume these are grouped and sent on a per company and not a per unit basis.

Summary of Total Annual Responses

(A)	(B)	(C)
Information Collection Activity	Number of Respondents	Number of Responses
Electronic data submittal	97	3

(D)	(E)
Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(B \times C)+D$
0	291
Subtotal (rounded)	291

Number of Respondents			
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports
	(A)	(B)	(C)
Year	Number of New Respondents	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports
1	0	96	0
2	1	96	0
3	1	97	0
Average	1	96	0

(D)	(E)
Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
0	96
0	97
0	98
0	97