

Overview - Number of Facilities and CEMS/CPMS Subject to ICR

Cells highlighted in blue denote values updated by ERG. All other cells use values EPA provided from calcula

Number of Facilities Subject to ICR	2137.06		
	Year 1	Year 2	Year 3
Existing Facilities	1,244	1,246	1,248
New Facilities	2	2	2

Number of CEMS/CPMS Subject to ICR	HAP	2137.06		
		Year 1	Year 2	Year 3
A. Existing CEMS	PM	N/A	N/A	N/A
	HCl	N/A	N/A	N/A
	Hg	700	700	700
	HF	N/A	N/A	N/A
	Total Existing CEMS/CPMS	700	700	700
B. New CEMS	PM	1,246	1,248	1,250
	HCl	255	257	259
	Hg	397	399	401
	HF	0	0	0
	Total New CEMS/CPMS	1,898	1,904	1,910
C. Total CEMS in Operation	PM	1,246	1,248	1,250
	HCl	255	257	259
	Hg	1,097	1,099	1,101
	HF	0	0	0
	Total CEMS/CPMS	2,598	2,604	2,610

Average CEMS/CPMS per Facility	2.09	2.09	2.09
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Supporting Information

Calculations for 2137.06	ICR Year	EGU Type	New	Existing
	Year 1	Coal-fired >8,300	2	1,046
	Coal-fired <8,300	0	36	
	IGCC	0	2	
	liq oil-fired	0	149	
	solid oil-fired	0	11	
	Total	2	1,244	

	Year 2	Coal-fired >8,300	2	1,048
		Coal-fired <8,300	0	36
		IGCC	0	2
		liq oil-fired	0	149
		solid oil-fired	0	11
		Total	2	1,246
	Year 3	Coal-fired >8,300	2	1,050
		Coal-fired <8,300	0	36
		IGCC	0	2
		liq oil-fired	0	149
		solid oil-fired	0	11
		Total	2	1,248
Calculations for 2137.07	Year 1	Coal-fired >8,300	2	1,052
		Coal-fired <8,300	0	36
		IGCC	0	2
		liq oil-fired	0	149
		solid oil-fired	0	11
		Total	2	1,250
	Year 2	Coal-fired >8,300	2	1,054
		Coal-fired <8,300	0	36
		IGCC	0	2
		liq oil-fired	0	149
		solid oil-fired	0	11
		Total	2	1,252
Year 3	Coal-fired >8,300	2	1,056	
	Coal-fired <8,300	0	36	
	IGCC	0	2	
	liq oil-fired	0	149	
	solid oil-fired	0	11	
	Total	2	1,254	
Calculations for 2137.08	Year 1	Coal-fired >8,300	0	630
		Coal-fired <8,300	0	26
		IGCC	0	3
		liq oil-fired	0	60
		solid oil-fired	0	8
		Total	0	727
	Year 2	Coal-fired >8,300	0	630
		Coal-fired <8,300	0	26
		IGCC	0	3
		liq oil-fired	0	60
		solid oil-fired	0	8
		Total	0	727
Year 3	Coal-fired >8,300	0	630	
	Coal-fired <8,300	0	26	
	IGCC	0	3	
	liq oil-fired	0	60	

		solid oil-fired	0	8
		Total	0	727
Calculations for 2137.12 (2024)	Year 1	Coal-fired >8,300	62	301
		Coal-fired <8,300	3	13
		IGCC	0	0
		liq oil-fired	11	51
		solid oil-fired	1	7
		Total	77	372
	Year 2	Coal-fired >8,300	62	301
		Coal-fired <8,300	3	13
		IGCC	0	0
		liq oil-fired	11	51
		solid oil-fired	1	7
		Total	77	372
	Year 3	Coal-fired >8,300	62	301
		Coal-fired <8,300	3	13
		IGCC	0	0
liq oil-fired		11	51	
solid oil-fired		1	7	
Total		77	372	
Calculations for 2137.12 (2025)	Year 1	Coal-fired >8,300	0	301
		Coal-fired <8,300	0	13
		IGCC	0	0
		liq oil-fired	0	51
		solid oil-fired	0	7
		Total	0	372
	Year 2	Coal-fired >8,300	0	301
		Coal-fired <8,300	0	13
		IGCC	0	0
		liq oil-fired	0	51
		solid oil-fired	0	7
		Total	0	372
	Year 3	Coal-fired >8,300	0	301
		Coal-fired <8,300	0	13
		IGCC	0	0
liq oil-fired		0	51	
solid oil-fired		0	7	
Total		0	372	

Year 1

PM CEMS Units

Total facilities

PM CEMS units

new PM
CEMS units

0

0 private

0 public
units

new PM CEMS

Total
facilities
with new
PM CEMS
per year

0

0 private

0 public
facilities

new PM CEMS

Total EGUs
per year

372

310 private

62 public
EGUs

existing

tions for the previous ICR.

2137.07			2137.08		
Year 1	Year 2	Year 3	Year 1	Year 2	Year 3
1,250	1,252	1,254	727	727	727
2	2	2	0	0	0

2137.07			2137.08		
Year 1	Year 2	Year 3	Year 1	Year 2	Year 3
1,250	1,252	1,254	723	723	723
259	261	263	607	607	607
1,101	1,103	1,105	555	555	555
0	0	0	0	0	0
2,610	2,616	2,622	1,884	1,884	1,884
2	2	2	0	0	0
2	2	2	0	0	0
2	2	2	0	0	0
0	0	0	0	0	0
6	6	6	0	0	0
1,252	1,254	1,256	723	723	723
261	263	265	607	607	607
1,103	1,105	1,107	555	555	555
0	0	0	0	0	0
2,616	2,622	2,628	1,884	1,884	1,884

2.09	2.09	2.09	2.59	2.59	2.59
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PM			HCl	SO2	Hg	HF
M5, M202	M29	M29	M320	M6A	M30B	M320
1,048	1,048	0	255	0	1,048	
36	36	0	0	0	36	
2	2		0		2	
149	0	0	0		0	
11	11	0	0	0	11	
1,246	1,097	0	255	0	1,097	0

1,050	1,050	0	257	0	1,050	
36	36	0	0	0	36	
2	2		0		2	
149	0	0	0		0	
11	11	0	0	0	11	
1,248	1,099	0	257	0	1,099	0
1,052	1,052	0	259	0	1,052	
36	36	0	0	0	36	
2	2		0		2	
149	0	0	0		0	
11	11	0	0	0	11	
1,250	1,101	0	259	0	1,101	0
1,054	1,054	0	261	0	1,054	
36	36	0	0	0	36	
2	2		0		2	
149	0	0	0		0	
11	11	0	0	0	11	
1,252	1,103	0	261	0	1,103	0
1,056	1,056	0	263	0	1,056	
36	36	0	0	0	36	
2	2		0		2	
149	0	0	0		0	
11	11	0	0	0	11	
1,254	1,105	0	263	0	1,105	0
1,058	1,058	0	265	0	1,058	
36	36	0	0	0	36	
2	2		0		2	
149	0	0	0		0	
11	11	0	0	0	11	
1,256	1,107	0	265	0	1,107	0
630	630	0	580	0	529	
22	22	0	20	0	22	
3	3		0		0	
60	0	0	0		0	
8	8	0	7	0	4	
723	663	0	607	0	555	0
630	630	0	580	0	529	
22	22	0	20	0	22	
3	3	0	0		0	
60	60	0	0		0	
8	8	0	7	0	4	
723	723	0	607	0	555	0
630	630	0	580	0	529	
22	22	0	20	0	22	
3	3		0		0	
60	60	0	0		0	

8	8	0	7	0	4	
723	723	0	607	0	555	0
						0
						0
						0
						0
						0
						0
						0
						0
						0
						0

141

309

283

192

160 private
32 public
facilities

1.94

Updated formulas to address changes to cells E70:M87 (changes to existing inventory per OAQPS)
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Updated formulas to address changes to cells E70:M87 (no new sources)
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Notes
M5 and M202 are most expensive for total PM; HCl testing more expensive than SO2; Hg testing is required
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All sources must use M29 for Hg; assumed would use for total HAP metals as well; M320 required for HF and HCl; no SO2 required
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M5 and M202 are most expensive for total PM; HCl testing more expensive than SO2; Hg testing is required
All sources must use M29 for Hg; assumed would use for total HAP metals as well; M320 required for HF and HCl; no SO2 required
M5 and M202 are most expensive for total PM; HCl testing more expensive than SO2; Hg testing is required

Updated existing unit counts based on data provided by OAQPS for RTR, with no new units for next 3 year prd
Revised # of units with CEMS/CPMS based on data provided by OAQPS, see %CEMSCPMSvstesting tab

Not really new sources but units that are required to install PM CEMS divided by 3; all units must install PM CEMS over the course of 3 years
For unit counts, assuming 96% of total 314 coal-fired units are >8,300 and 4% are <8,300

For unit counts, assuming 88% of total 58 O/G steam units are liquid oil fired and 12% are solid oil-fired

Change in rule to no longer require the installation of PM CEMS

For unit counts, assuming 96% of total 314 coal-fired units are >8,300 and 4% are <8,300

For unit counts, assuming 88% of total 58 O/G steam units are liquid oil fired and 12% are solid oil-fired

0.966912

50

8%

0.960366

1.477304 0.004127

0.882353

e of this ICR (32% of units)

314

58

372

372

314

58

372

372

Table 1a: Annual Respondent Burden and Cost for Private Facilities - NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU)

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year *	Technical hours per year (ExD.05)	Management hours per year (ExD.10)	Clerical hours per year (ExD.10)	Total cost per year (\$) ¹
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	160.6	1	160.6	0	0	0	0	0
4. Report requirements								
A. Familiarization with regulatory requirements	1	1	1	160	160	8.0	16.0	\$27,810.77 ^{facility}
B. Required activities								
Existing sources								
Annual performance test (PM, Method 5) ²	27.8	1	27.8	192	5,341	267	534	928,734 ^{EGU}
Annual performance test (HCl, Method 320) ³	26.4	1	26.4	58	1,391	70	139	241,829 ^{EGU}
Annual performance test (Hg, Method 30B) ⁴	27.8	1	27.8	74	2,068	103	207	359,510 ^{EGU}
CEMS quarterly inspections ⁵	2.5	4	10	257	2,572	129	257	444,232 ^{EGU}
CEMS daily calibration drift tests ⁶	0.4	365	146	257	37,553	1,877.6	3,755.3	\$6,529,590 ^{EGU}
CEMS daily monitoring ⁷	0.25	365	91.25	257	23,470	1,173.52	2,347.0	\$4,080,994 ^{EGU}
All CEMS must follow appropriate performance specifications ⁸	14	1	14	257	3,601	180.0	360.1	\$626,125.11 ^{EGU}
PM CEMS sources								
Initial performance test (PM, Method 5)	27.8	1	27.8	0	0	0	0	0 ^{EGU}
Initial performance test (HCl, Method 320)	26.4	1	26.4	0	0	0	0	0 ^{EGU}
Initial performance test (Hg, Method 30B)	27.8	1	27.8	0	0	0	0	0 ^{EGU}
CEMS quarterly inspections	2.46	4	9.84	0	0	0	0	0 ^{EGU}
CEMS daily calibration drift tests	0.12	365	43.8	0	0	0	0	0 ^{EGU}
CEMS daily monitoring	0	365	0	0	0	0	0	0 ^{EGU}
All CEMS must follow appropriate performance specifications	7.3	365	2664.5	0	0	0	0	0 ^{EGU}
C. Create information	See 4B							
D. Gather existing information	See 4E							
E. Write Report								
Existing sources								
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	5	1	5	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	4	1	4	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	31.0	310	15.5	31.0	\$53,880 ^{EGU}
Semianual compliance report	6	2	12	130	40,286	2,014	4,029	\$7,024,840 ^{EGU}
Site-specific performance evaluation test plan	20	1	20	310	6,198	310	620	1,077,668 ^{EGU}
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	31.0	155	8	15	26,942 ^{EGU}
PM CEMS sources								
Initial notification	3	1	3	0	0	0	0	0 ^{EGU}
Notification of CEMS demonstration	5	1	5	0	0	0	0	0 ^{EGU}
Notification of initial performance test	4	1	4	0	0	0	0	0 ^{EGU}
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0 ^{EGU}
Quality assurance program certification	3	1	3	0	0	0	0	0 ^{EGU}
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	0.0	0	0	0	0 ^{EGU}
Semianual compliance report	75	2	150	0	0	0	0	0 ^{EGU}
Site-specific performance evaluation test plan	20	1	20	0	0	0	0	0 ^{EGU}
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	0.0	0	0	0	0 ^{EGU}
Subtotal for Reporting Requirements						141,570		\$21,405,161
5. Recordkeeping requirements								
A. Familiarization with regulatory requirements	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Record data	N/A							
E. Time to transmit or disclose information								
Existing sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	31.0	372	18.6	37.2	\$64,660 ^{EGU}
Records of startups, shutdowns, malfunctions, etc.	1	12	12	31.0	372	18.6	37.2	\$64,660 ^{EGU}
Records of monthly fuel use	2	12	24	310	7,437	371.9	743.7	\$1,293,202 ^{EGU}
PM CEMS sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	0.0	0	0	0	0 ^{EGU}
Records of startups, shutdowns, malfunctions, etc.	1	12	12	0.0	0	0	0	0 ^{EGU}
Records of monthly fuel use	2	12	24	0	0	0	0	0 ^{EGU}
F. Time to train personnel	80	1	80	0	0	0	0	0 ^{facility}
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					9,408			\$1,422,522
TOTAL LABOR BURDEN AND COSTS (ROUNDED) ⁹						151,000		\$22,800,000
TOTAL CAPITAL AND O&M COST (ROUNDED) ¹⁰								\$43,100,000
Grand Total (ROUNDED) ¹¹								\$64,000,000

Footnotes:
a EPA estimates an average of 372 units at 192 existing facilities per year will be subject to the NESHAP over the next 3 years. Of these, 83.3% are owned by private industry. 83.3% of 192 facilities are private facilities = 160. 83.3% of 372 units are at private facilities = 310 units; 62% of 310 previously had PM CEMS or conducted PM stack tests = 192. The remaining 118 units had PM CEMS.
b This ICR uses the following labor rates: \$157.25 (technical), \$181.99 (managerial), and \$75.31 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2024, "Table 2. Civilian workers, by occupational and industry group." The rates are from column 1, "Total compensation," https://www.bls.gov/news.release/eccc.t02.htm. They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
c Estimates are based on the number privately-owned EGU's complying with annual testing requirements for PM, HCl, and Hg, in lieu of CEMS/CPMS monitoring for these pollutants and includes 192 EGU's conducting Method 5 testing, 53 EGU's conducting Method 320 testing, and 74 EGU's conducting Method 30B testing.
d Assumes that 309 EGU's use HCl or SO2 CEMS and 83.3% of those are privately-owned = 257.
e Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Assumptions and calculation area:

Respondent Labor Rates	Loaded	Unloaded	Rate (110%)
Technical (Management, professional, and related; Professional and related)	\$157.25	\$74.88	2.1
Managerial (Management, professional, and related; Management, business and financial)	\$181.99	\$86.66	2.1
Clerical (Sales and office; Office and administrative support)	\$75.31	\$35.84	2.1

Average Annual Capital Costs for Performance Testing			
Test Method	Cost per Test	Number of Tests	Total Cost
PM-PS-11 using MS	\$5,167	192	\$992,761
HCl Method 320	\$20,444	53	\$1,077,038
Hg Method 30B	\$20,006	74	\$1,487,929
Total	\$45,617	319	\$3,557,727

Average Annual Capital Costs for CEMS Installation (Labor and Other Direct Costs)			
CEM	Cost per Installation	Number of Installations	Total Cost
new PM CEMS/PM	\$7,941	0	\$0
new HCl CEMS/HCl	\$111,045	0	\$0
new Hg CEMS/Hg	\$174,002	0	\$0
Total	\$292,987	0	\$0
Total Capital Cost:			\$3,557,727

Average Annual Operation and Maintenance (O&M) Costs					
CEM	Costs per Monitor			Number of Monitors	Total Annual Cost
	Labor	Testing	ODC's		
PM	\$0	\$14,210	\$13,893	\$27,963	\$3,295,251
HCl	\$14,789	\$10,932	\$15,897	441,618	\$10,704,557
Hg	\$19,959	\$40,012	\$40,035	236	\$23,553,232
Total					\$37,553,039

CRF 0.1097946247 (1-(1+)^n) 7% interest and 15 year life
(1+)^n -1
0.193122079
1.7590315407
0.1097946247

\$41,110,766
\$8,239,319
\$49,350,085

relative response audit (RRA) and response correlation audit (RCA)

PM stack test

1340574 0.69278853 277.333038
247390 0.91673849 53.9167515
411476 0.87370842 85.1246476

Method of testing used for response correlation audits, RRAs and RCAs.

Table 1a: Annual Respondent Burden and Cost for Private Facilities - NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU)

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Eo.05)	Clerical hours per year (Ex.10)	Total cost per year (\$) ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	160.6	1	160.6	0	0	0	0	0
4. Report requirements								
A. Familiarization with regulatory requirements	1	1	1	160	160	8.0	16.0	\$27,810.79
B. Required activities								
Existing sources								
Annual performance test (PM, Method 5) ^c	27.8	1	27.8	192	5,341	267	534	928,734
Annual performance test (HCl, Method 320) ^d	26.4	1	26.4	53	1,391	70	139	241,829
Annual performance test (Hg, Method 308) ^e	27.8	1	27.8	74	2,068	103	207	359,510
CEMS quarterly inspections ^f	2.5	4	10	257	2,572	129	257	\$447,232
CEMS daily calibration drift tests ^g	0.4	365	146	257	37,553	1,877.6	3,755.3	\$6,529,590
CEMS daily monitoring	0.23	365	84.3	257	23,470	1,173.52	2,347.0	\$4,080,994
All CEMS must follow appropriate performance specifications ^h	14	1	14	257	3,601	180.0	360.1	\$626,125
New PM CEMS sources								
Initial performance test (PM, Method 5)	27.8	1	27.8	0	0	0	0	0
Initial performance test (HCl, Method 320)	26.4	1	26.4	0	0	0	0	0
Initial performance test (Hg, Method 308)	27.8	1	27.8	0	0	0	0	0
CEMS quarterly inspections	2.46	4	9.84	0	0	0	0	0
CEMS daily calibration drift tests	0.12	365	43.8	0	0	0	0	0
CEMS daily monitoring	0	365	0	0	0	0	0	0
All CEMS must follow appropriate performance specifications	7.3	1	7.3	0	0	0	0	0
C. Create information	See 4B							
D. Gather existing information	See 4E							
E. Write Report								
Existing sources								
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	3	1	3	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	4	1	4	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	310	310	15.5	31.0	\$53,883
Semiannual compliance report	65	2	130	310	40,286	2,014	4,029	\$7,004,842
Site-specific performance evaluation test plan	20	1	20	310	6,198	310	620	1,077,668
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	31.0	155	8	15	26,942
New PM CEMS sources								
Initial notification	3	1	3	0	0	0	0	0
Notification of CEMS demonstration	3	1	3	0	0	0	0	0
Notification of initial performance test	4	1	4	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	3	1	3	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	0	0	0	0	0
Semiannual compliance report	75	2	150	0	0	0	0	0
Site-specific performance evaluation test plan	20	1	20	0	0	0	0	0
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	0	0	0	0	0
Subtotal for Reporting Requirements						441,570	0	\$21,405,161
5. Recordkeeping requirements								
A. Familiarization with regulatory requirements	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Record data	N/A							
E. Time to transmit or disclose information								
Existing sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	310	372	18.6	37.2	\$64,660
Records of startups, shutdowns, malfunctions, etc.	1	12	12	310	372	18.6	37.2	\$64,660
Records of monthly fuel use	2	12	24	310	7,437	371.9	743.7	\$1,293,202
New sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	0	0	0	0	0
Records of startups, shutdowns, malfunctions, etc.	1	12	12	0	0	0	0	0
Records of monthly fuel use	2	12	24	0	0	0	0	0
F. Time to train personnel	80	1	80	0	0	0	0	0
C. Time for audits	N/A					9,408		\$1,422,522
Subtotal for Recordkeeping Requirements						151,000		\$22,800,000
TOTAL LABOR BURDEN AND COSTS (ROUNDED) ^a								\$41,100,000
TOTAL CAPITAL AND O&M COST (ROUNDED) ^a								\$64,000,000
GRAND TOTAL (ROUNDED) ^a								\$105,100,000

Footnotes:
a EPA estimates an average of 372 units at 192 existing facilities per year will be subject to the NESHAP over the next 3 years. Of these, 83.3% are owned by private industry. 83.3% of 192 facilities are private facilities = 160. 83.3% of 372 units are at private facilities = 310 units; 62% of 310 previously had PM CEMS or conducted PM stack tests = 192. The remaining 118 units had PM CEMS.
b This ICR uses the following labor rates: \$157.25 (technical), \$181.99 (managerial), and \$75.31 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2024, "Table 2. Civilian workers, by occupational and industry group." The rates are from column 1, "Total compensation." https://www.bls.gov/news.release/occc102.htm They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
c Estimates are based on the number privately-owned EGU's complying with annual testing requirements for PM, HCl, and Hg, in lieu of CEMS/CPMS monitoring for these pollutants and includes 192 EGU's conducting Method 5 testing, 53 EGU's conducting Method 320 testing, and 74 EGU's conducting Method 308 testing.
d Assumes that 309 EGU's use HCl or SO2 CEMs and 83.3% of those are privately-owned = 257.
e Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Assumptions and calculation area:

Respondent Labor Rates	Loaded	Unloaded	Rate (110%)
Technical (Management, professional, and related; Professional and related)	\$157.25	\$74.88	2.1
Managerial (Management, professional, and related; Management, business and financial)	\$181.99	\$86.66	2.1
Clerical (Sales and office; Office and administrative support)	\$75.31	\$35.86	2.1

Average Annual Capital Costs for Performance Testing				
Test Method	Cost per Test	Number of Tests	Total Cost	
PM/PS 11 using M5	\$5,167	192	\$992,761	
HCl/Method 320	\$20,444	53	\$1,077,038	
Hg/Method 308	\$20,006	74	\$1,487,929	
Total	\$45,617	319	\$3,557,727	
Average Annual Capital Costs for CEMS Installation (Labor and Other Direct Costs)				
Equipment	CEM	Cost per Installation	Number of Installations	Total Cost
new PM CEMS/PM		\$7,741	0	\$0
new FIR CEMS/HCl		\$111,045	0	\$0
new Hg CEMS/Hg		\$174,002	0	\$0
Total		\$292,987	0	\$0
Total Capital Cost: \$3,557,727				

Average Annual Operation and Maintenance (O&M) Costs						
CEM	Costs per Monitor			Number of Monitors	Total Annual Cost	
	Labor	Testing	ODC's			
PM	\$0	\$14,290	\$13,693	\$27,983	118	\$3,295,231
HCl	\$14,789	\$10,932	\$15,897	\$41,618	257	\$10,704,557
Hg	\$19,959	\$40,012	\$40,038	\$100,006	236	\$23,553,232
Total						\$37,553,019

\$41,110,766

\$8,239,319

\$49,350,085

relative response audit (RRA) and response correlation audit (RCA)

PM stack test

1340574 0.69278853 277.333038
247590 0.97673049 53.9367515
411476 0.87370842 85.1246476

Method 5 would only be used for initial correlations, RRAs and RCAs.

Table 1a: Annual Respondent Burden and Cost for Private Facilities - NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU)

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Eo.05)	Clerical hours per year (Ex.10)	Total cost per year (\$) ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	160.6	1	160.6	0	0	0	0	0
4. Report requirements								
A. Familiarization with regulatory requirements	1	1	1	160	160	8.0	16.0	\$27,810.79
B. Required activities								
Existing sources								
Annual performance test (PM, Method 5) ^c	27.8	1	27.8	192	5,341	267	534	928,734
Annual performance test (HCl, Method 320) ^d	26.4	1	26.4	53	1,391	70	139	241,829
Annual performance test (Hg, Method 308) ^e	27.8	1	27.8	74	2,068	103	207	359,510
CEMS quarterly inspections ^f	2.5	4	10	257	2,572	129	257	\$447,232
CEMS daily calibration drift tests ^g	0.4	365	146	257	37,553	1,877.6	3,755.3	\$6,529,590
CEMS daily monitoring	0.23	365	84.23	257	23,470	1,173.52	2,347.0	\$4,080,994
All CEMS must follow appropriate performance specifications ^h	14	1	14	257	3,401	180.0	360.1	\$626,125
New PM CEMS sources								
Initial performance test (PM, Method 5)	27.8	1	27.8	0	0	0	0	0
Initial performance test (HCl, Method 320)	26.4	1	26.4	0	0	0	0	0
Initial performance test (Hg, Method 308)	27.8	1	27.8	0	0	0	0	0
CEMS quarterly inspections	2.46	4	9.84	0	0	0	0	0
CEMS daily calibration drift tests	0.12	365	43.8	0	0	0	0	0
CEMS daily monitoring	0	365	0	0	0	0	0	0
All CEMS must follow appropriate performance specifications	7.3	365	2664.5	0	0	0	0	0
C. Create information	See 4B							
D. Gather existing information	See 4E							
E. Write Report								
Existing sources								
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	3	1	3	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	4	1	4	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	310	310	15.5	31.0	\$53,883
Semiannual compliance report	65	2	130	310	40,286	2,014	4,029	\$7,004,842
Site-specific performance evaluation test plan	20	1	20	310	6,198	310	620	1,077,668
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	31.0	155	8	15	26,942
New sources								
Initial notification	3	1	3	0	0	0	0	0
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	4	1	4	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	3	1	3	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	0	0	0	0	0
Semiannual compliance report	75	2	150	0	0	0	0	0
Site-specific performance evaluation test plan	20	1	20	0	0	0	0	0
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	0	0	0	0	0
Subtotal for Reporting Requirements						141,570	0	\$21,405,161
5. Recordkeeping requirements								
A. Familiarization with regulatory requirements	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Record data	N/A							
E. Time to transmit or disclose information								
Existing sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	310	372	18.6	37.2	\$64,660
Records of startups, shutdowns, malfunctions, etc.	1	12	12	310	372	18.6	37.2	\$64,660
Records of monthly fuel use	2	12	24	310	7,437	371.9	743.7	\$1,293,202
New PM CEMS sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	0	0	0	0	0
Records of startups, shutdowns, malfunctions, etc.	1	12	12	0	0	0	0	0
Records of monthly fuel use	2	12	24	0	0	0	0	0
F. Time to train personnel	80	1	80	0	0	0	0	0
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						9,408		\$1,422,522
TOTAL LABOR BURDEN AND COSTS (ROUNDED) ^a						151,000		\$22,800,000
TOTAL CAPITAL AND O&M COST (ROUNDED) ^a								\$41,100,000
GRAND TOTAL (ROUNDED) ^a								\$64,000,000

Footnotes:
a EPA estimates an average of 372 units at 192 existing facilities per year will be subject to the NESHAP over the next 3 years. Of these, 83.3% are owned by private industry. 83.3% of 192 facilities are private facilities = 160. 83.3% of 372 units are at private facilities = 310 units; 62% of 310 previously had PM CEMS or conducted PM stack tests = 192. The remaining 118 units had PM CEMS.
b This ICR uses the following labor rates: \$157.25 (technical), \$181.99 (managerial), and \$75.31 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2024, "Table 2. Civilian workers, by occupational and industry group." The rates are from column 1, "Total compensation," https://www.bls.gov/news.release/eccc.t02.htm. They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
c Estimates are based on the number privately-owned EGU's complying with annual testing requirements for PM, HCl, and Hg, in lieu of CEMS/CPMS monitoring for these pollutants and includes 192 EGU's conducting Method 5 testing, 53 EGU's conducting Method 320 testing, and 74 EGU's conducting Method 308 testing.
d Assumes that 309 EGU's use HCl or SO2 CEMS and 83.3% of those are privately-owned = 257.
e Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Assumptions and calculation area:

Respondent Labor Rates	Loaded	Unloaded	Rate (110%)
Technical (Management, professional, and related; Professional and related)	\$157.25	\$74.88	2.1
Managerial (Management, professional, and related; Management, business and financial)	\$181.99	\$86.66	2.1
Clerical (Sales and office; Office and administrative support)	\$75.31	\$35.86	2.1

Average Annual Capital Costs for Performance Testing			
Test Method	Cost per Test	Number of Tests	Total Cost
PM/PS 11 using M5	\$5,167	192	\$992,761
HCl/Method 320	\$20,444	53	\$1,077,038
Hg/Method 308	\$20,006	74	\$1,487,929
Total	\$45,617	319	\$3,557,727

Average Annual Capital Costs for CEMS Installation (Labor and Other Direct Costs)			
Equipment	CEM	Cost per Installation	Number of Installations
new PM CEMS/PM		\$7,941	0
new HCl CEMS/HCl		\$111,045	0
new Hg CEMS/Hg		\$174,002	0
Total		\$292,987	0

Total Capital Cost: \$3,557,727

Average Annual Operation and Maintenance (O&M) Costs						
CEM	Costs per Monitor				Number of Monitors	Total Annual Cost
	Labor	Testing	ODC's	Total		
PM	\$0	\$14,290	\$13,493	\$27,783	138	\$3,295,251
HCl	\$14,789	\$10,932	\$15,897	\$41,618	257	\$10,704,557
Hg	\$19,959	\$40,012	\$40,035	\$100,006	236	\$23,553,232
Total						\$37,553,039

\$41,110,766

\$8,239,319

\$49,350,085

relative response audit (RRA) and response correlation audit (RCA)

PM stack test

1340574 0.69278853 277.333038
247590 0.97673049 53.9367515
411476 0.87370842 85.1246476

Method 5 would only be used for initial correlations, RRAs and RCAs.

Table 1a: Annual Respondent Burden and Cost for Private Facilities - NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU)

	A	B	C	D	E	F	G	H
Burden Item	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year *	Technical hours per year (GD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) 1
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	160.6	1	160.6	0	0	0	0	0
4. Report requirements								
A. Familiarization with regulatory requirements	1	1	1	160	160	8.0	16.0	27,811
B. Required activities								
Existing sources								
Annual performance test (PM, Method 5) 1	27.8	1	27.8	192	5,341	267	534	928,734
Annual performance test (HCl, Method 320) 1	26.4	1	26.4	53	1,391	70	139	241,829
Annual performance test (Hg, Method 308) 1	27.8	1	27.8	74	2,068	103	207	359,510
CEMS quarterly inspections 4	2.5	4	10	257	2,572	129	257	447,232
CEMS daily calibration drift tests 4	0.4	365	146	257	37,553	1,877.6	3,755.3	6,529,590
CEMS daily monitoring 4	0.25	365	91.25	257	23,470	1,173.52	2,347.0	4,080,994
All CEMS must follow appropriate performance specifications 4	14	1	14	257	3,601	180.0	360.1	626,125
New PM CEMS sources								
Initial performance test (PM, Method 5)	27.8	1	27.8	0	0	0	0	0
Initial performance test (HCl, Method 320)	26.4	1	26.4	0	0	0	0	0
Initial performance test (Hg, Method 308)	27.8	1	27.8	0	0	0	0	0
CEMS quarterly inspections	2.5	4	10	0	0	0	0	0
CEMS daily calibration drift tests	0.12	365	43.8	0	0	0	0	0
CEMS daily monitoring	0	365	0	0	0	0	0	0
All CEMS must follow appropriate performance specifications	7.3	1	7.3	0	0	0	0	0
C. Create information	See 4B							
D. Gather existing information	See 4E							
E. Write Report								
Existing sources								
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	3	1	3	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	4	1	4	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	31.0	310	15.5	31.0	53,883
Semiannual compliance report	63	2	130	310	40,286	2,014	4,029	7,004,842
Site-specific performance evaluation test plan	20	1	20	310	6,198	310	620	1,077,668
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	31.0	155	8	15	26,942
New sources								
Initial notification	3	1	3	0	0	0	0	0
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	4	1	4	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	3	1	3	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	0.0	0	0	0	0
Semiannual compliance report	75	2	150	0	0	0	0	0
Site-specific performance evaluation test plan	20	1	20	0	0	0	0	0
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	0.0	0	0	0	0
Subtotal for Reporting Requirements						140,000		21,405,181
5. Recordkeeping requirements								
A. Familiarization with regulatory requirements	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Record data	See 4B							
E. Time to transmit or disclose information	N/A							
Existing sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	31.0	372	18.6	37.2	64,660
Records of startups, shutdowns, malfunctions, etc.	1	12	12	31.0	372	18.6	37.2	64,660
Records of monthly fuel use	2	12	24	310	7,437	371.9	743.7	1,293,202
New sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	0.0	0	0	0	0
Records of startups, shutdowns, malfunctions, etc.	1	12	12	0.0	0	0	0	0
Records of monthly fuel use	2	12	24	0	0	0	0	0
F. Time to train personnel	80	1	80	0	0	0	0	0
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						9,400		\$1,422,526
TOTAL LABOR BURDEN AND COSTS (ROUNDED) *						149,000		\$22,800,000
TOTAL CAPITAL AND O&M COST (ROUNDED) *								\$41,100,000
GRAND TOTAL (ROUNDED) *								\$64,000,000

relative response audit (RRA) and response correlation audit (RCA)

PM stack test

1540574 0.69278853 277.333038
247590 0.97872049 53.9267515
411476 0.87370842 85.1246476

Method 5 would only be used for initial correlations, RRAs and RCAs.

179,000 \$24,500,000
\$49,300,000

Footnotes:

- a EPA estimates an average of 372 units at 192 existing facilities per year will be subject to the NESHAP over the next 3 years. Of these, 83.3% are owned by private industry. 83.3% of 192 facilities are private facilities = 160. 83.3% of 372 units are at private facilities = 310 units; 62% of 310 previously had PM CEMS or conducted PM stack tests each year = 192. The remaining 118 units had PM CEMS.
- b This ICR uses the following labor rates: \$157.25 (technical), \$181.99 (managerial), and \$75.31 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2024, "Table 2. Civilian workers, by occupational and industry group." The rates are from column 1, "Total compensation." https://www.bls.gov/news.release/ecoc.t02.htm They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- c Estimates are based on the number privately-owned EGU's complying with annual testing requirements for PM, HCl, and Hg, in lieu of CEMS/CPMS monitoring for these pollutants and includes 192 EGU's conducting Method 5 testing, 53 EGU's conducting Method 320 testing, and 74 EGU's conducting Method 308 testing.
- d Assumes that 309 EGU's use HCl or SO2 CEMS and 83.3% of those are privately-owned = 257.
- e Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Assumptions and calculation area:

Respondent Labor Rates	Loaded	Unloaded	Rate (110%)
Technical (Management, professional, and related; Professional and related)	\$157.25	\$74.88	2.1
Managerial (Management, professional, and related; Management, business and financial)	\$181.99	\$86.66	2.1
Clerical (Sales and office; Office and administrative support)	\$75.31	\$35.86	2.1

Average Annual Capital Costs for Performance Testing			
Test Method	Cost per Test	Number of Tests	Total Cost
HAP PS-11 using M5	\$5,167	192	\$992,761
HCl Method 320	\$20,444	53	\$1,077,038
Hg Method 308	\$20,054	74	\$1,482,929
Total	\$45,617	319	\$3,557,727

Average Annual Capital Costs for CEMS Installation (Labor and Other Direct Costs)			
CEM	Cost per Installation	Number of Installations	Total Cost
new PM CEMS	\$7,941	0	\$0
new FTIR CEMS	\$111,045	0	\$0
new Hg CEMS	\$174,002	0	\$0
Total	\$292,987	0	\$0
Total Capital Cost:			\$3,557,727

Average Annual Operation and Maintenance (O&M) Costs					
CEM	Labor	Costs per Monitor		Number of Monitors	Total Annual Cost
		Testing	ODC's		
PM	\$0	\$14,290	\$13,693	227,983	\$3,295,251
HCl	\$14,789	\$10,932	\$15,897	257	\$10,704,557
Hg	\$19,959	\$40,012	\$40,035	238	\$23,553,238
Total					\$37,553,039

\$41,110,766
\$8,239,319
\$49,350,085

Table 1b: Annual Respondent Burden and Cost for Public Facilities - NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU)

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year *	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^a
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	160.6	1	160.6	0	0	0	0	0
4. Report requirements								
A. Familiarization with regulatory requirements	1	1	1	32	32	1.6	3.2	\$2,051.74
B. Required activities								
Existing sources								
Annual performance test (PM, Method 5) ^c	27.8	1	27.8	39	1,070	54	107	68,517
Annual performance test (HCl, Method 320) ^c	26.4	1	26.4	11	279	14	28	17,841
Annual performance test (Hg, Method 308) ^c	27.8	1	27.8	15	414	21	41	26,523
CEMS quarterly inspections ^d	2.5	4	10	52	515	26	52	\$32,994.56
CEMS daily calibration drift tests ^d	0.4	365	146	52	7,526	376.3	752.6	\$481,720.63
CEMS daily monitoring ^d	0.25	365	91.25	52	4,704	235.19	470.4	\$301,075.40
All CEMS must follow appropriate performance specifications ^e	14	1	14	52	722	36.1	72.2	\$46,192.39
New PM CEMS sources								
Initial performance test (PM, Methods 5 and 202)	27.8	1	27.8	0	0	0	0	0
Initial performance test (HCl, Method 320)	26.4	1	26.4	0	0	0	0	0
Initial performance test (Hg, Method 308)	27.8	1	27.8	0	0	0	0	0
CEMS quarterly inspections	2.46	4	9.84	0	0	0	0	0
CEMS daily calibration drift tests	0.12	365	43.8	0	0	0	0	0
CEMS daily monitoring	0	365	0	0	0	0	0	0
All CEMS must follow appropriate performance specifications	7.3	365	2664.5	0	0	0	0	0
C. Create information	See 4B							
D. Gather existing information	See 4E							
E. Write Report								
Existing sources								
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	3	1	3	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	4	1	4	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	6	62	3.1	6.2	\$3,975.25
Semiannual compliance report	65	2	130	62	8,074	404	807	\$516,782.33
Site-specific performance evaluation test plan	20	1	20	62	1,242	62	124	79,505
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	6	31	2	3	1,988
New sources								
Initial notification	3	1	3	0	0	0	0	0
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	4	1	4	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	3	1	3	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	0.0	0	0	0	0
Semiannual compliance report	75	2	150	0	0	0	0	0
Site-specific performance evaluation test plan	20	1	20	0	0	0	0	0
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	0.0	0	0	0	0
Subtotal for Reporting Requirements						28,373		\$1,579,166
5. Recordkeeping requirements								
A. Familiarization with regulatory requirements	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Record data	N/A							
E. Time to transmit or disclose information								
Existing sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	6.2	75	3.7	7.5	\$4,770.30
Records of startups, shutdowns, malfunctions, etc.	1	12	12	6.2	75	3.7	7.5	\$4,770.30
Records of monthly fuel use	2	12	24	62	1,491	74.5	149.1	\$95,405.97
New PM CEMS sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	0.0	0	0	0	0
Records of startups, shutdowns, malfunctions, etc.	1	12	12	0.0	0	0	0	0
Records of monthly fuel use	2	12	24	0	0	0	0	0
F. Time to train personnel	80	1	80	0	0	0	0	0
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						1,886		\$104,947
TOTAL LABOR BURDEN AND COSTS (ROUNDED) ^a						30,000		\$1,700,000
TOTAL CAPITAL AND O&M COST (ROUNDED) ^a								\$8,200,000
GRAND TOTAL (ROUNDED) ^a						32,000		\$9,900,000

PM stack test

45735 1.73838359 35.7273426

Footnotes:

^a EPA estimates an average of 372 units at 192 existing facilities per year will be subject to the NESHAP over the next 3 years. Of these, 16.7% are public facilities. 16.7% of 192 facilities are public facilities = 32. 16.7% of 372 units at public facilities = 62. 62% of 62 previously had PM CPMS or conducted PM stack tests = 39. The remaining 24 units had PM CEMS.

^b This ICR uses the following labor rates: \$57.07 (technical), \$76.91 (managerial), and \$30.88 (clerical). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, effective January 2023, which excludes locality rates of pay: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/GS_h.pdf. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

^c Estimates are based on the number of publicly owned EGUs complying with annual testing requirements for PM, HCl, and Hg, in lieu of CEMS/CPMS monitoring for these pollutants and includes 39 EGUs conducting Method 5 testing, 11 EGUs conducting Method 320 testing, and 15 EGUs conducting Method 308 testing.

^d Assumes that 309 EGUs use HCl or SO2 CEMs and 16.7% of those are publicly-owned = 52.

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

Assumptions and calculation area:

Respondent Labor Rates	Loaded	Multiplier	Unloaded	Updated to agency rates
Technical (Grade 12, Step 1)	\$57.07	1.6	\$35.67	
Managerial (Grade 13, Step 5)	\$76.91	1.6	\$48.07	
Clerical (Grade 6, Step 3)	\$30.88	1.6	\$19.30	

Average Annual Capital Costs for Performance Testing			
HAP	Test Method	Cost per Test	Number of Tests
PM	PS-11 using M5	\$5,167	39
HCl	Method 320	\$20,444	11
Hg	Method 308	\$20,006	15
Total		\$45,617	64

Average Annual Capital Costs for CEMS Installation (Labor and Other Direct Costs)			
Equipment	CEM	Cost per Installation	Number of Installations
new beta gauge PM CEMS	PM	\$7,941	0
new FTIR CEMS	HCl	\$111,045	0
new Hg CEMS	Hg	\$174,002	0
Total		\$292,987	0
Total Capital Cost:			\$713,031

Average Annual Operation and Maintenance (O&M) Costs						
CEM	Labor	Costs per Monitor			Number of Monitors	Total Annual Cost
		Testing	ODC's	Total		
PM	\$0	\$14,290	\$13,693	\$27,983	24	\$660,426.05
HCl	\$14,789	\$10,932	\$15,899	\$41,618	52	\$2,143,381
Hg	\$19,959	\$40,032	\$40,035	\$100,006	47	\$4,720,481
Total						\$7,526,288

\$8,239,319

Table 1b: Annual Respondent Burden and Cost for Public Facilities - NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU)

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	160.6	1	160.6	0	0	0	0	0
4. Report requirements								
A. Familiarization with regulatory requirements	1	1	1	32	32	1.6	3.2	\$2,051.74
B. Required activities								
Existing sources								
Annual performance test (PM, Method 5) ^c	27.8	1	27.8	39	1,070	54	107	68,517
Annual performance test (HCl, Method 320) ^c	26.4	1	26.4	11	279	14	28	17,841
Annual performance test (Hg, Method 308) ^c	27.8	1	27.8	15	414	21	41	26,523
CEMS quarterly inspections ^d	2.5	4	10	52	515	26	52	\$32,994.56
CEMS daily calibration drift tests ^d	0.4	365	146	52	7,526	376.3	752.6	\$481,720.63
CEMS daily monitoring ^e	0.25	365	91.25	52	4,704	235.19	470.4	\$301,075.40
All CEMS must follow appropriate performance specifications ^e	14	1	14	52	722	36.1	72.2	\$46,192.39
New PM CEMS sources								
Initial performance test (PM, Methods 5 and 202)	27.8	1	27.8	0	0	0	0	0
Initial performance test (HCl, Method 320)	26.4	1	26.4	0	0	0	0	0
Initial performance test (Hg, Method 308)	27.8	1	27.8	0	0	0	0	0
CEMS quarterly inspections	2.46	4	9.84	0	0	0	0	0
CEMS daily calibration drift tests	0.12	365	43.8	0	0	0	0	0
CEMS daily monitoring	0	365	0	0	0	0	0	0
All CEMS must follow appropriate performance specifications	7.3	365	2664.5	0	0	0	0	0
C. Create information	See 4B							
D. Gather existing information	See 4E							
E. Write Report								
Existing sources								
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	3	1	3	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	4	1	4	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	6	62	3.1	6.2	\$3,975.25
Semiannual compliance report	65	2	130	62	8,074	404	807	\$516,782.33
Site-specific performance evaluation test plan	20	1	20	62	1,242	62	124	79,505
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	6	31	2	3	1,988
New PM CEMS sources								
Initial notification	3	1	3	0	0	0	0	0
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	4	1	4	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	3	1	3	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	0.0	0	0	0	0
Semiannual compliance report	75	2	150	0	0	0	0	0
Site-specific performance evaluation test plan	20	1	20	0	0	0	0	0
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	0.0	0	0	0	0
Subtotal for Reporting Requirements						28,373		\$1,579,166
5. Recordkeeping requirements								
A. Familiarization with regulatory requirements	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Record data	N/A							
E. Time to transmit or disclose information								
Existing sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	6.2	75	3.7	7.5	\$4,770.30
Records of startups, shutdowns, malfunctions, etc.	1	12	12	6.2	75	3.7	7.5	\$4,770.30
Records of monthly fuel use	2	12	24	62	1,491	74.5	149.1	\$95,405.97
New PM CEMS sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	0.0	0	0	0	0
Records of startups, shutdowns, malfunctions, etc.	1	12	12	0.0	0	0	0	0
Records of monthly fuel use	2	12	24	0	0	0	0	0
F. Time to train personnel	80	1	80	0	0	0	0	0
G. Time for audits	N/A					1,886		\$104,947
Subtotal for Recordkeeping Requirements								
TOTAL LABOR BURDEN AND COSTS (ROUNDED) ^a						30,000		\$1,700,000
TOTAL CAPITAL AND O&M COST (ROUNDED) ^a								\$8,200,000
GRAND TOTAL (ROUNDED) ^a						32,000		\$9,900,000

45735 1.73838359 95.7279426

PM stack test

Footnotes:

- a EPA estimates an average of 372 units at 192 existing facilities per year will be subject to the NESHAP over the next 3 years. Of these, 16.7% are public facilities. 16.7% of 192 facilities are public facilities = 32. 16.7% of 372 units at public facilities = 63; 62% of 63 previously had PM CPMS or conducted PM stack tests = 39.
- b This ICR uses the following labor rates: \$57.07 (technical), \$76.91 (managerial), and \$30.88 (clerical). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, effective January 2023, which excludes locality rates of pay: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/GS_h.pdf. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
- c Estimates are based on the number of publicly owned EGUs complying with annual testing requirements for PM, HCl, and Hg. In lieu of CEMS/CPMS monitoring for these pollutants and includes 39 EGUs conducting Method 5 testing, 11 EGUs conducting Method 320 testing, and 15 EGUs conducting Method 308 testing.
- d Assumes that 309 EGUs use HCl or SO2 CEMs and 16.7% of those are publicly-owned = 52.
- e Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Assumptions and calculation area:

Respondent Labor Rates	Loaded	Multiplier	Unloaded	Updated to agency rates
Technical (Grade 12, Step 1)	\$57.07	1.6	\$35.67	
Managerial (Grade 13, Step 5)	\$76.91	1.6	\$48.07	
Clerical (Grade 6, Step 3)	\$30.88	1.6	\$19.30	

Average Annual Capital Costs for Performance Testing			
Test Method	Cost per Test	Number of Tests	Total Cost
PM-11 using MS	\$5,167	39	\$198,967
HCl Method 320	\$20,444	11	\$224,884
Hg Method 308	\$20,006	15	\$299,090
Total	\$45,617	64	\$713,031

Average Annual Capital Costs for CEMS Installation (Labor and Other Direct Costs)				
Equipment	CEM	Cost per Installation	Number of Installations	Total Cost
new beta gauge PM CEMS	PM	\$7,941	0	\$0
new FTIR CEMS	HCl	\$111,045	0	\$0
new Hg CEMS	Hg	\$174,002	0	\$0
Total		\$292,987	0	\$0
Total Capital Cost:				\$713,031

Average Annual Operation and Maintenance (O&M) Costs						
CEM	Costs per Monitor				Number of Monitors	Total Annual Cost
	Labor	Testing	ODC's	Total		
PM	\$0	\$14,290	\$13,693	\$27,983	24	\$660,426.05
HCl	\$14,789	\$10,932	\$15,897	\$41,618	52	\$2,145,381
Hg	\$19,959	\$40,012	\$40,035	\$100,006	47	\$4,720,481
Total						\$7,526,288

\$8,239,319

Table 1b: Annual Respondent Burden and Cost for Public Facilities - NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU)

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (ExD.05)	Clerical hours per year (E.x10)	Total cost per year (\$) ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	160.6	1	160.6	0	0	0	0	0
4. Report requirements								
A. Familiarization with regulatory requirements	1	1	1	32	32	1.6	3.2	\$2,051.74
B. Required activities								
Existing sources								
Annual performance test (PM, Method 5) ^c	27.8	1	27.8	39	1,070	54	107	68,517
Annual performance test (HCl, Method 320) ^d	26.4	1	26.4	11	279	14	28	17,841
Annual performance test (Hg, Method 308) ^d	27.8	1	27.8	15	414	21	41	26,523
CEMS quarterly inspections ^e	2.5	4	10	52	515	26	52	\$32,994.56
CEMS daily calibration drift tests ^d	0.4	365	146	52	7,526	376.3	752.6	\$481,720.63
CEMS daily monitoring ^d	0.25	365	91.25	52	4,704	235.19	470.4	\$301,075.40
All CEMS must follow appropriate performance specifications ^d	14	1	14	52	722	36.1	72.2	\$46,192.39
New PM CEMS sources								
Initial performance test (PM, Methods 5 and 202)	27.8	1	27.8	0	0	0	0	0
Initial performance test (HCl, Method 320)	26.4	1	26.4	0	0	0	0	0
Initial performance test (Hg, Method 308)	27.8	1	27.8	0	0	0	0	0
CEMS quarterly inspections	2.46	4	9.84	0	0	0	0	0
CEMS daily calibration drift tests	0.12	365	43.8	0	0	0	0	0
CEMS daily monitoring	0	365	0	0	0	0	0	0
All CEMS must follow appropriate performance specifications	7.3	365	2664.5	0	0	0	0	0
C. Create information	See 4B							
D. Gather existing information	See 4E							
E. Write Report								
Existing sources								
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	3	1	3	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	4	1	4	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	6	62	3.1	6.2	\$3,975.25
Semiannual compliance report	65	2	130	62	8,074	404	807	\$516,782.33
Site-specific performance evaluation test plan	20	1	20	62	1,242	62	124	79,505
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	6	31	2	3	1,988
New PM CEMS sources								
Initial notification	3	1	3	0	0	0	0	0
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	4	1	4	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	3	1	3	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	0.0	0	0	0	0
Semiannual compliance report	75	2	150	0	0	0	0	0
Site-specific performance evaluation test plan	20	1	20	0	0	0	0	0
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	0.0	0	0	0	0
Subtotal for Reporting Requirements						28,373		\$1,579,166
5. Recordkeeping requirements								
A. Familiarization with regulatory requirements	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Record data	N/A							
E. Time to transmit or disclose information								
Existing sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	6.2	75	3.7	7.5	\$4,770.30
Records of startups, shutdowns, malfunctions, etc.	1	12	12	6.2	75	3.7	7.5	\$4,770.30
Records of monthly fuel use	2	12	24	62	1,491	74.5	149.1	\$95,405.97
New PM CEMS sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	0.0	0	0	0	0
Records of startups, shutdowns, malfunctions, etc.	1	12	12	0.0	0	0	0	0
Records of monthly fuel use	2	12	24	0	0	0	0	0
F. Time to train personnel	80	1	80	0	0	0	0	0
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						1,886		\$104,967
TOTAL LABOR BURDEN AND COSTS (ROUNDED) ^a						30,000		\$1,700,000
TOTAL CAPITAL AND O&M COST (ROUNDED) ^a								\$8,200,000
GRAND TOTAL (ROUNDED) ^a						32,000		\$9,900,000

45735 1.78838359 35.7273426

PM stack test

Footnotes:
 a EPA estimates an average of 372 units at 192 existing facilities per year will be subject to the NESHAP over the next 3 years. Of these, 16.7% are public facilities.
 16.7% of 192 facilities are public facilities = 32.
 16.7% of 372 units at public facilities = 65; 62% of 63 previously had PM CPMS or conducted PM stack tests = 39.

b This ICR uses the following labor rates: \$57.07 (technical), \$76.91 (managerial), and \$30.88 (clerical). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, effective January 2023, which excludes locality rates of pay: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/GS_h.pdf. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
 c Estimates are based on the number of publicly owned units complying with testing requirements for PM, HCl, and Hg. If not all CEMS are PM monitoring for these pollutants and instead of CEMS conducting Method 308 testing, all CEMS conducting Method 308 testing, and 15 EGU's conducting Method 308 testing.
 d Assumes that 309 EGUs use HCl or SO2 CEMS and 16.7% of those are publicly-owned = 52.
 e Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Assumptions and calculation area:

Respondent Labor Rates	Loaded	Multiplier	Unloaded	Updated to agency rates
Technical (Grade 12, Step 3)	\$57.07	1.6	\$35.67	
Managerial (Grade 13, Step 5)	\$76.91	1.6	\$48.07	
Clerical (Grade 6, Step 3)	\$30.88	1.6	\$19.30	

Average Annual Capital Costs for Performance Testing			
Test Method	Cost per Test	Number of Tests	Total Cost
PM PS-11 using M5	\$5,167	39	\$198,967
HCl Method 320	\$20,444	11	\$215,857
Hg Method 308	\$20,006	15	\$298,207
Total	\$45,617	64	\$713,031

Average Annual Capital Costs for CEMS Installation (Labor and Other Direct Costs)			
CEM	Cost per Installation	Number of Installations	Total Cost
new beta gauge PM CEMS	\$7,941	0	\$0
new FTIR CEMS	\$111,045	0	\$0
new Hg CEMS	\$174,002	0	\$0
Total	\$292,987	0	\$0
Total Capital Cost:			\$713,031

Average Annual Operation and Maintenance (O&M) Costs						
CEM	Costs per Monitor				Number of Monitors	Total Annual Cost
	Labor	Testing	ODC's	Total		
PM	\$0	\$14,290	\$13,693	\$27,983	24	\$660,426.05
HCl	\$14,789	\$10,932	\$15,897	\$41,618	52	\$2,145,381
Hg	\$19,959	\$40,012	\$40,035	\$100,006	47	\$4,720,481
Total						\$7,526,288

\$8,239,319

Table 1b: Annual Respondent Burden and Cost for Public Facilities - NESHAP for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU)

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year *	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	160.6	1	160.6	0	0	0	0	0
4. Report requirements								
A. Familiarization with regulatory requirements	1	1	1	32	32	1.6	3.2	2,052
B. Required activities								
Existing sources								
Annual performance test (PM, Method 5) ^c	27.8	1	27.8	39	1,070	54	107	68,517
Annual performance test (HCl, Method 320) ^d	26.4	1	26.4	11	279	14	28	17,841
Annual performance test (Hg, Method 308) ^d	27.8	1	27.8	15	414	21	41	26,523
CEMS quarterly inspections ^e	2.5	4	10	52	515	26	52	32,995
CEMS daily calibration drift tests ^e	0.4	365	146	52	7,526	376.3	752.6	481,721
CEMS daily monitoring ^e	0.25	365	91.25	52	4,704	235.19	470.4	301,075
All CEMS must follow appropriate performance specifications ^e	14	1	14	52	722	36.1	72.2	46,192
New PM CEMS sources								
Initial performance test (PM, Methods 5 and 202)	27.8	1	27.8	0	0	0	0	0
Initial performance test (HCl, Method 320)	26.4	1	26.4	0	0	0	0	0
Initial performance test (Hg, Method 308)	27.8	1	27.8	0	0	0	0	0
CEMS quarterly inspections	2.46	4	9.84	0	0	0	0	0
CEMS daily calibration drift tests	0.12	365	43.8	0	0	0	0	0
CEMS daily monitoring	0	365	0	0	0	0	0	0
All CEMS must follow appropriate performance specifications	7.3	365	2664.5	0	0	0	0	0
C. Create information	See 4B							
D. Gather existing information	See 4E							
E. Write Report								
Existing sources								
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	3	1	3	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	4	1	4	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	6	62	3.1	6.2	3,975
Semiannual compliance report	45	2	130	62	8,074	404	807	516,782
Site-specific performance evaluation test plan	20	1	20	62	1,242	62	124	79,505
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	6	31	2	3	1,988
New PM CEMS sources								
Initial notification	3	1	3	0	0	0	0	0
Notification of CEMS demonstration	5	1	5	0	0	0	0	0
Notification of initial performance test	4	1	4	0	0	0	0	0
Performance test report	See 4B							
Notification of compliance status	16.5	1	16.5	0	0	0	0	0
Quality assurance program certification	3	1	3	0	0	0	0	0
Startup, shutdown, and malfunction report (10% of respondents)	10	1	10	0.0	0	0	0	0
Semiannual compliance report	75	2	150	0	0	0	0	0
Site-specific performance evaluation test plan	20	1	20	0	0	0	0	0
Request to use alternative monitoring procedure (10% of respondents)	5	1	5	0.0	0	0	0	0
Subtotal for Reporting Requirements						28,000		1,579,166
5. Recordkeeping requirements								
A. Familiarization with regulatory requirements	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Record data	N/A							
E. Time to transmit or disclose information								
Existing sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	6.2	75	3.7	7.5	4,770
Records of startups, shutdowns, malfunctions, etc.	1	12	12	6.2	75	3.7	7.5	4,770
Records of monthly fuel use	2	12	24	62	1,491	74.5	149.1	95,406
New sources								
Records of CEMS malfunctions (10% of respondents)	1	12	12	0.0	0	0	0	0
Records of startups, shutdowns, malfunctions, etc.	1	12	12	0.0	0	0	0	0
Records of monthly fuel use	2	12	24	0	0	0	0	0
F. Time to train personnel	80	1	80	0	0	0	0	0
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						1,900		\$105,000
TOTAL LABOR BURDEN AND COSTS (ROUNDED) ^a						30,000		\$1,700,000
TOTAL CAPITAL AND O&M COST (ROUNDED) ^a								\$8,200,000
GRAND TOTAL (ROUNDED) ^a								\$9,900,000

PM stack test

45735 1.73838359 35.7273426

30,000

Footnotes:
^a EPA estimates an average of 372 units at 192 existing facilities per year will be subject to the NESHAP over the next 3 years. Of these, 16.7% are public facilities.
 16.7% of 192 facilities are public facilities = 32
 16.7% of 372 units at public facilities = 63; 62% of 63 previously had PM CPMS or conducted PM stack tests = 39.

^b This ICR uses the following labor rates: \$57.07 (technical), \$76.91 (managerial), and \$30.88 (clerical). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, effective January 2024, which excludes locality rates of pay: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/GS_h.pdf. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

^c Estimates are based on the number of publicly owned EGUs complying with annual testing requirements for PM, HCl, and Hg, in lieu of CEMS/CPMS monitoring for these pollutants and includes 39 EGUs conducting Method 5 testing, 11 EGUs conducting Method 320 testing, and 15 EGUs conducting Method 308 testing.

^d Assumes that 309 EGUs use HCl or SO2 CEMS and 16.7% of those are publicly-owned = 52.

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

Assumptions and calculation area:

Respondent Labor Rates	Loaded	Multiplier	Unloaded
Technical (Grade 12, Step 1)	\$57.07	1.6	\$35.67
Managerial (Grade 13, Step 5)	\$76.91	1.6	\$48.07
Clerical (Grade 6, Step 3)	\$30.88	1.6	\$19.30

Average Annual Capital Costs for Performance Testing			
HAP	Test Method	Cost per Test	Number of Tests
PM	PM-11 using MS	\$5,167	39
HCl	Method 320	\$20,444	11
Hg	Method 308	\$20,006	15
Total		\$45,617	64
Total Cost: \$713,031			

Average Annual Capital Costs for CEMS Installation (Labor and Other Direct Costs)			
Equipment	CEM	Cost per Installation	Number of Installations
new beta gauge PM CEMS	PM	\$7,941	0
new FTIR CEMS	HCl	\$111,045	0
new Hg CEMS	Hg	\$174,002	0
Total		\$292,987	0
Total Capital Cost: \$713,031			

\$4,270,758

Average Annual Operation and Maintenance (O&M) Costs						
CEM	Costs per Monitor				Number of Monitors	Total Annual Cost
	Labor	Testing	ODC's	Total		
PM	\$0	\$14,290	\$13,693	\$27,983	24	\$660,426
HCl	\$14,789	\$10,932	\$15,897	\$41,618	52	\$2,145,381
Hg	\$19,959	\$40,012	\$40,035	\$100,006	47	\$4,720,481
Total						\$7,526,288

\$8,239,319

Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – NESHAP for Coal- and

Affected Sector	Number of Responses	Labor Hours			Labor Cost
		Reporting	Recordkeeping	Total	
Private	1,311	141,570	9,408	150,979	\$22,800,000
Public (State/Local/Tribal)	263	28,373	1,886	30,259	\$1,700,000
Total (rounded)	1,574	169,943	11,294	181,237	\$24,500,000

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

2011 Final Rule		% by sector	Current		% by sector
Total # facilities:	575		Total # of facilities :	192	
Total private sector:	479	83.3%	Total private sector	160	83.3%
Total public sector:	96	16.7%	Total public sector	32	16.7%

1.9375 Units per facility (f

Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU)

Capital Cost	O&M Cost	Total Cost
\$3,557,727	\$37,553,039	\$63,910,766
\$713,031	\$7,526,288	\$9,939,319
\$4,270,758	\$45,079,327	\$73,850,085

115 hrs/response

372
310
62

0.454161 191.6559

ootprint)

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Private	1,311	141,570	9,408	150,979	\$22,800,000
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\$4,270,758	\$45,079,327	\$73,850,085

115 hrs/response

372

310

62

ootprint)

Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector - NESHA

Affected Sector	Number of Responses	Labor Hours		
		Reporting	Recordkeeping	Total
Private	1,311	142,000	9,400	151,000
Public (State/Local/Tribal)	263	28,400	1,900	30,000
Total (rounded)	1,574	170,000	11,300	181,000

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

2011 Final Rule		% by sector	Current	
Total # facilities:	575		Total # of facilities :	192
Total private sector:	479	83.3%	Total private sector	160
Total public sector:	96	16.7%	Total public sector	32

1.9375

P for Coal- and Oil-Fired Electric Utility Steam Generating Units (40 CFR Part 63, Subpart UUUUU)

Labor Cost	Capital Cost	O&M Cost	Total Cost
\$ 22,800,000	\$ 3,600,000	\$ 37,600,000	\$ 63,900,000
\$ 1,700,000	\$ 700,000	\$ 7,500,000	\$ 9,900,000
\$ 24,500,000	\$ 4,300,000	\$ 45,100,000	\$ 73,800,000

115 hrs/response

% by sector
83.3%
16.7%

372

0.454161

310

62

Units per facility (footprint)

Difference from 2137.12 (2024 version)

Labor	Capital and O	Total
\$ (26,300,000)	\$ (3,300,000)	\$ (29,700,000)
\$ (2,300,000)	\$ (700,000)	\$ (3,100,000)
\$ (28,600,000)	\$ (4,000,000)	\$ (32,800,000)

Difference from 2137.10

Labor	
\$	(1,900,000)
\$	(400,000)
\$	(2,300,000)

191.6559

Capital and O&MTotal

\$ (43,600,000) \$ (46,100,000)
\$ (8,800,000) \$ (9,200,000)
\$ (52,600,000) \$ (55,200,000)

Table 2a -- Agency Year 1

Burden Item	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
Observe initial performance test ^c	24	1	24	0	0	0	0	0
Observe repeat performance test ^d	24	0.2	4.8	0	0	0	0	0
Review initial notification	0.5	1	0.5	0	0	0	0	0
Review notification of CEMS demonstration	0.5	1	0.5	0	0	0	0	0
Review notification of initial performance test	0.5	1	0.5	0	0	0	0	0
Review performance test report	8	1	8	0	0	0	0	0
Review quality assurance program certification	0.5	1	0.5	0	0	0	0	0
Review startup, shutdown, and malfunction report (10% of respondents)	8	1	8	37.2	298	14.88	29.76	\$19,048
Review semiannual compliance report	8	1	8	372	2,976	148.8	297.6	\$190,481
Review notification of compliance status	0.5	1	0.5	0	0	0	0	0
Review site-specific performance evaluation test plan	8	1	8	372	2,976	149	298	190,481
Review request to use alternative monitoring procedure (10% of respondents)	0.5	1	0.5	37.2	19	1	2	1,191
Travel Expenses ^e								\$0
TOTAL (ROUNDED) ^f						7,210		\$401,000

Footnotes:

a EPA estimates 372 existing EGUs will be subject to the NESHAP each year.

b This ICR uses the following labor rates: \$57.07 (technical), \$76.91 (managerial), and \$30.88 (clerical). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, effective January 2024, which excludes locality rates of pay: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/GS_h.pdf. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

c EPA estimates it will observe 20% of initial performance tests.

d EPA assumes 20% of initial performance tests must be repeated due to failure.

e EPA estimates annual travel expenses to be \$400 per plant and assumes EPA will visit 0 plants per year = (1 person x 0 plants/year x 3 days/plant x \$50 per diem) + (\$250 round trip/plant x 18 plants/year) = \$0/year.

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

Assumptions and calculation area:

Agency Labor Rates	Unloaded Labor Rate	Multiplier	Loaded Labor Rate
GS-12 Step 1 Technical	\$35.67	1.6	\$57.07
GS-13 Step 5 Managerial	\$48.07	1.6	\$76.91
GS-06 Step 3 Clerical	\$19.30	1.6	\$30.88
Travel Expenses			
\$ 400			

Table 2a -- Agency Year 1

Burden Item	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
Observe initial performance test ^c	24	1	24	0	0	0	0	0
Observe repeat performance test ^d	24	0.2	4.8	0	0	0	0	0
Review initial notification	0.5	1	0.5	0	0	0	0	0
Review notification of CEMS demonstration	0.5	1	0.5	0	0	0	0	0
Review notification of initial performance test	0.5	1	0.5	0	0	0	0	0
Review performance test report	8	1	8	0	0	0	0	0
Review quality assurance program certification	0.5	1	0.5	0	0	0	0	0
Review startup, shutdown, and malfunction report (10% of respondents)	8	1	8	37.2	298	14.88	29.76	\$19,048
Review semiannual compliance report	8	1	8	372	2,976	148.8	297.6	\$190,481
Review notification of compliance status	0.5	1	0.5	0	0	0	0	0
Review site-specific performance evaluation test plan	8	1	8	372	2,976	149	298	190,481
Review request to use alternative monitoring procedure (10% of respondents)	0.5	1	0.5	37.2	19	1	2	1,191
Travel Expenses ^e								\$0
TOTAL (ROUNDED) ^f						7,210		\$401,000

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	Travel Expenses		
SALARY TABLE 20	\$ 400		

Table 2a -- Agency Year 1

Burden Item	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
Observe initial performance test ^c	24	1	24	0	0	0	0	0
Observe repeat performance test ^d	24	0.2	4.8	0	0	0	0	0
Review initial notification	0.5	1	0.5	0	0	0	0	0
Review notification of CEMS demonstration	0.5	1	0.5	0	0	0	0	0
Review notification of initial performance test	0.5	1	0.5	0	0	0	0	0
Review performance test report	8	1	8	0	0	0	0	0
Review quality assurance program certification	0.5	1	0.5	0	0	0	0	0
Review startup, shutdown, and malfunction report (10% of respondents)	8	1	8	37.2	298	14.88	29.76	\$19,048
Review semiannual compliance report	8	1	8	372	2,976	148.8	297.6	\$190,481
Review notification of compliance status	0.5	1	0.5	0	0	0	0	0
Review site-specific performance evaluation test plan	8	1	8	372	2,976	149	298	190,481
Review request to use alternative monitoring procedure (10% of respondents)	0.5	1	0.5	37.2	19	1	2	1,191
Travel Expenses ^e								\$0
TOTAL (ROUNDED) ^f						7,210		\$401,000

Footnotes:

a EPA estimates 372 existing EGUs will be subject to the NESHAP each year.

b This ICR uses the following labor rates: \$57.07 (technical), \$76.91 (managerial), and \$30.88 (clerical). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, effective January 2024, which excludes locality rates of pay: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/GS_h.pdf. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

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Travel Expenses			
SALARY TABLE 20 \$	400		

Table 2a -- Agency Year 1

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Observe repeat performance test ^d	24	0.2	4.8	0	0	0	0	0
Review initial notification	0.5	1	0.5	0	0	0	0	0
Review notification of CEMS demonstration	0.5	1	0.5	0	0	0	0	0
Review notification of initial performance test	0.5	1	0.5	0	0	0	0	0
Review performance test report	8	1	8	0	0	0	0	0
Review quality assurance program certification	0.5	1	0.5	0	0	0	0	0
Review startup, shutdown, and malfunction report (10% of respondents)	8	1	8	37.2	298	14.88	29.76	\$19,048
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Review notification of compliance status	0.5	1	0.5	0	0	0	0	0
Review site-specific performance evaluation test plan	8	1	8	372	2,976	149	298	190,481
Review request to use alternative monitoring procedure (10% of respondents)	0.5	1	0.5	37.2	19	1	2	1,191
Travel Expenses ^e								\$0
TOTAL (ROUNDED) ^f						7,210		\$401,000

Footnotes:

a EPA estimates 372 existing EGUs will be subject to the NESHAP each year.

b This ICR uses the following labor rates: \$57.07 (technical), \$76.91 (managerial), and \$30.88 (clerical). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, effective January 2024, which excludes locality rates of pay: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/GS_h.pdf. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

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GS-06 Step 3 Clerical	\$19.30	1.6	\$30.88
	Travel Expenses		
SALARY TABLE 20	\$ 400		

Table 1d -- Respondent Summary

	B	C	D	E	F	G	H
2							
3	Total Annual Responses						
4	(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses per year	(D) Number of Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D		
5	Existing Sources						
6	Notification of CEMS demonstration	0	1	0	0		
7	Notification of initial performance test	0	1	0	0		
8	Performance test report	383	1	0	383		
9	Notification of compliance status	0	1	0	0		
10	Quality assurance program certification	0	1	0	0		
11	Startup, shutdown, and malfunction report (10% of respondents)	37.2	1	0	37.2		
12	Semiannual compliance report	372	2	0	744		
13	Site-specific performance evaluation test plan	372	1	0	372		
14	Request to use alternative monitoring procedure (10% of respondents)	37.2	1	0	37.2		
15	New PM CEMS Sources						

Table 1d -- Respondent Summary

	B	C	D	E	F	G	H
2							
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4	(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses per year	(D) Number of Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D		
5	Existing Sources						
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	B	C	D	E	F	G	H
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6	Notification of CEMS demonstration	0	1	0	0		
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9	Notification of compliance status	0	1	0	0		
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12	Semiannual compliance report	372	2	0	744		
13	Site-specific performance evaluation test plan	372	1	0	372		
14	Request to use alternative monitoring procedure (10% of respondents)	37.2	1	0	37.2		
15	New PM CEMS Sources						

No. Release Pts	Hg Compliance Method		
610	All	Counts	%
372	Hg CMS*	283	76
	Stack Test	89	24

PM Compliance I	
All Units	Counts
PM CMS**	372
Stack Test	0

No. Release Pts	C	Counts	%
522	C	Counts	%
0.85573770491803	Hg CMS*	264	84
314			
	Stack Test	50	16

C	Counts
PM CMS**	314
Stack Test	0

Lignite Coal

No. Release Pts	L	Counts	%
23	L	Counts	%
0.04406130268199	Hg CMS*	14	83
16			
	Stack Test	3	17

L	Counts
PM CMS**	16
Stack Test	0

IGCC

No. Release Pts	PTC	Counts	%
3	PTC	Counts	%
0.1304347826087	Hg CMS*	0	0
49			
	Stack Test	49	100

PTC	Counts
PM CMS**	49
Stack Test	0

Oil: Oil, Diesel Oil, Residual Oil, Other Oil

No. Release Pts	OIL	Counts	%
56	OIL	Counts	%
0.09180327868852	Hg CMS*	0	0
34			
	Stack Test	34	100

OIL	Counts
PM CMS**	34
Stack Test	0

Petroleum Coke

No. Release Pts	PTC	Counts	%
6	PTC	Counts	%
0.10714285714286	Hg CMS*	20	50
40			
	Stack Test	20	50

PTC	Counts
PM CMS**	40
Stack Test	0

* Hg CEMS or Hg sorbent traps

** PM CEMS or PM CPI

Method
%
100
0

AG Compliance Method		
All Units	Counts	%
HCI CEMS	4	1
SO2 CEMS	305	82
Stack Test	63	17

Average % Units Usin
0.863
Average % Units Testi
0.137

%		C	Counts	%
100		HCI CEMS	3	1
		SO2 CEMS	286	91
0		Stack Test	25	8

Average % Units Test
0.363

%		L	Counts	%
100		HCI CEMS	0	0
		SO2 CEMS	13	78
0		Stack Test	4	22

%		PTC	Counts	%
100		HCI CEMS	0	0
0		Stack Test	49	100

%		OIL	Counts	%
100		HCI CEMS		0
			0	
0		Stack Test	34	100

%		PTC	Counts	%
100		HCI CEMS	7	17
	6.64	SO2 CEMS	26	66
0		Stack Test	7	17

MS

		PM Compliance Method			This number of existing units with	
3 years		All Units	Counts	%	3 years	
					Year 1	
g CEMS	47.12	PM CEMS	141	38%	PM CEMS	141
	2.48	PM CPMS	7	2.0%	PM CPMS	7.4400
ing	74.4	Stack Test	223	60%	Stack Test	223

		C			This number of new PM CEMS units each year	
		Counts	%	PM CEMS		
					Year 1	
		PM CMS*	113	36		0
		Stack Test	201	64	Private PM CEMS	118
					Public PM CEMS	24

ing from 2137.10

Lignite Coal

		L	Counts	%		
		PM CMS*	4	22	Private PM stack test	192
					Public PM stack test	39
		Stack Test	13	78		

IGCC

		PTC	Counts	%		
		PM CMS*	0	0	private Hg CEMS	236
					public Hg CEMS	47
		Stack Test	49	100	private HCl/SO2 stack test	53
					public HCl/SO2 stack test	11

Oil: Oil, Diesel Oil, Residual

		OIL	Counts	%		
		PM CMS*	2	7	private Hg stack test	74
					public Hg stack test	15
		Stack Test	32	93		

Petroleum Coke

		PTC	Counts	%		
		PM CMS*	7	17	private HCl/SO2 CEMS	257
					public HCl/SO2 CEMS	52
		Stack Test	33	83		

** PM CEMS or PM CPMS

air compliance

Year 2	Year 3
141	141
7.4400	7.4400
223	223

r

0	0
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Private new PM CEMS	0.000
Public new PM CEMS	0.000

Year 2	Year 3
118	118
24	24

192	192
39	39

236	236
47	47

53	53
11	11

74	74
15	15

257	257
52	52

No. Release Pts	Hg Compliance Method		
610	All	Counts	%
372	Hg CMS*	283	76
	Stack Test	89	24

PM Compliance I	
All Units	Counts
PM CMS**	372
Stack Test	0

No. Release Pts	C	Counts	%
522	C	Counts	%
0.85573770491803	Hg CMS*	264	84
314			
	Stack Test	50	16

C	Counts
PM CMS**	314
Stack Test	0

Lignite Coal

No. Release Pts	L	Counts	%
23	L	Counts	%
0.04406130268199	Hg CMS*	14	83
16			
	Stack Test	3	17

L	Counts
PM CMS**	16
Stack Test	0

IGCC

No. Release Pts	PTC	Counts	%
3	PTC	Counts	%
0.1304347826087	Hg CMS*	0	0
49			
	Stack Test	49	100

PTC	Counts
PM CMS**	49
Stack Test	0

Oil: Oil, Diesel Oil, Residual Oil, Other Oil

No. Release Pts	OIL	Counts	%
56	OIL	Counts	%
0.09180327868852	Hg CMS*	0	0
34			
	Stack Test	34	100

OIL	Counts
PM CMS**	34
Stack Test	0

Petroleum Coke

No. Release Pts	PTC	Counts	%
6	PTC	Counts	%
0.10714285714286	Hg CMS*	20	50
40			
	Stack Test	20	50

PTC	Counts
PM CMS**	40
Stack Test	0

* Hg CEMS or Hg sorbent traps

** PM CEMS or PM CPI

Method
%
100
0

AG Compliance Method		
All Units	Counts	%
HCI CEMS	4	1
SO2 CEMS	305	82
Stack Test	63	17

Average % Units Usin
0.863
Average % Units Testi
0.137

%		C	Counts	%
100		HCI CEMS	3	1
		SO2 CEMS	286	91
0		Stack Test	25	8

Average % Units Test
0.363

%		L	Counts	%
100		HCI CEMS	0	0
		SO2 CEMS	13	78
0		Stack Test	4	22

%		PTC	Counts	%
100		HCI CEMS	0	0
0		Stack Test	49	100

%		OIL	Counts	%
100		HCI CEMS		0
			0	
0		Stack Test	34	100

%		PTC	Counts	%
100		HCI CEMS	7	17
	6.64	SO2 CEMS	26	66
0		Stack Test	7	17

MS

		PM Compliance Method			This number of existing units with	
3 years		All Units	Counts	%	Year 1	
g CEMS	47.12	PM CEMS	141	38%	PM CEMS	218
	2.48	PM CPMS	7	2.0%	PM CPMS	4.9600
ing	74.4	Stack Test	223	60%	Stack Test	149

		C			This number of new PM CEMS units each year	
ing from 2137.10		C	Counts	%	Year 1	
		PM CEMS*	113	36	PM CEMS	76.88
		Stack Test	201	64	Private PM CEMS	182
					Public PM CEMS	36

		Lignite Coal				
		L	Counts	%		
		PM CEMS*	4	22	Private PM stack test	124
					Public PM stack test	25
		Stack Test	13	78		

		IGCC				
		PTC	Counts	%		
		PM CEMS*	0	0	private Hg CEMS	236
					public Hg CEMS	47
		Stack Test	49	100	private HCl/SO2 stack test	53
					public HCl/SO2 stack test	11

		Oil: Oil, Diesel Oil, Residual				
		OIL	Counts	%		
		PM CEMS*	2	7	private Hg stack test	74
					public Hg stack test	15
		Stack Test	32	93		

		Petroleum Coke				
		PTC	Counts	%		
		PM CEMS*	7	17	private HCl/SO2 CEMS	257
					public HCl/SO2 CEMS	52
		Stack Test	33	83		

** PM CEMS or PM CPMS

air compliance

Year 2	Year 3
295	372
2.4800	0
74	0

r

76.88 76.88

Private new PM CEMS 64.044

Public new PM CEMS 12.836

Year 2	Year 3
246	310
49	62

62 0
12 0

236 236
47 47

53 53
11 11

74 74
15 15

257 257
52 52