

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal),
EPA ICR Number 1063.13, OMB Control Number 2060-0035

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) were proposed on August 17, 1971, promulgated on December 23, 1971, and amended on: October 6, 1975; November 10, 1977; October 6, 1988; October 17, 2000; and most-recently amended on February 27, 2014. The 2014 amendment revises the reference to Method 209F to reference the newer version of the method, Method 2540G. These regulations apply to each incinerator which combusts wastes that contain more than 10 percent sewage sludge (dry basis) produced by municipal sewage treatment plants or each incinerator which charges more than 1,000 kg (2,205 lb) per day municipal sewage sludge (dry basis). New facilities include those that commenced construction, modification, or reconstruction after the date of proposal. These standards set emission limitation for particulate matter (PM). This information is being collected to assure compliance with 40 CFR Part 60, Subpart O.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents, and retain the file for at least two years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

All of the sewage sludge treatment plants are owned by either state, local, or tribal governments (the "Affected Public"). None of the facilities in the United States are owned by the Federal Government. The "burden" to the "Affected Public" may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal). The "burden" to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Treatment Plants

(40 CFR Part 60, Subpart O) (Renewal).

Based on our consultations with industry representatives, there are an average of 2 affected units (86 facilities with 170 units) at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 86¹ respondents per year will be subject to these standards, and 0.4 additional respondents per year will become subject to these same standards due to modification or reconstruction. This is based on the assumption that two existing facilities will be either modified or reconstructed over the next five years (0.4 facility per year).

The Office of Management and Budget (OMB) approved the currently-active ICR without any “Terms of Clearance”.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

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

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(1).

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

In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control

¹ The number of sources for this ICR is based on the source count estimates for the upcoming Federal Plan Requirements for Sewage Sludge Incineration Units. EPA verified the source inventory for the final federal plan by reviewing information submitted by public commenters and communicating with each state to verify if the state was aware of any necessary revisions to the source inventory. The reduction in respondents since the previous ICR has occurred due to several facilities shutting down their incinerator units.

equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, PM emissions from sewage sludge treatment plants either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart O.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with these emission standards. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired and that the standards are being met. The performance test may also be observed.

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

3. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart O.

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does

not exist.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (81 FR 26546) on May 3, 2016. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the National Association of Clean Waters (NACWA), at chornback@nacwa.org; and 2) the Water Environment Federation (WEF), at cternieden@wef.org.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

3(d) Effects of Less-Frequent Collection

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less-frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made

will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are sewage sludge treatment plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 4952, which corresponds to the North American Industry Classification System (NAICS) 221320 for Sewage Treatment Facilities.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O).

A source must make the following reports:

Notifications and Reports	
Notification and application of construction or modification	60.7(a)(1)
Notification of actual startup	60.7(a)(3)
Notification of physical or operational change which may increase the emission rate	60.7(a)(4)
Notification of initial performance tests	60.8(d)
Demonstration of continuous monitoring system	60.7(a)(5)
Date upon which demonstration of continuous monitoring system performance commences	60.7(a)(5)
Report of initial performance test	60.8(a)

Notifications and Reports	
Owner or operator of any multiple hearth, fluidized bed, or electric sludge incinerator shall submit a semiannual report which contains the following: scrubber pressure drop measurements, oxygen content, temperatures, rate of sludge charged, moisture and volatile solids of daily grab sample of sludge charged to the incinerator, and a record of control device operation measurements for other than a wet scrubber.	60.155(a), 60.155(b), 60.155(c)

A source must keep the following records:

Recordkeeping	
Startups, shutdowns, or malfunctions periods where the continuous monitoring system is inoperative.	60.7(b)
Maintain a file of all measurements including, performance test measurements, and all other information required by this subpart recorded in a permanent file suitable for inspection.	60.7(f)
Recording of daily charging rates and hours of operations	60.153(a)(1)
Install, calibrate, maintain and operate weighing device for determination of the mass of any municipal solid waste charged to the incinerator.	60.153(a)(3)
Install, calibrate, maintain and operate a monitoring device that continuously measures and records the pressure drop of gas flow through the wet scrubbing device.	60.153(b)(1)
Install, calibrate, maintain and operate a monitoring device that continuously measures and records the oxygen content of the incinerator exhaust gas.	60.153(b)(2)
Install, calibrate, maintain and operate temperature measuring devices. The temperature monitoring devices shall be operated continuously and data recorded during all periods of operation of the incinerator.	60.153(b)(3)
Install, calibrate, maintain and operate a device for measuring the fuel flow to the incinerator. The fuel flow measuring device shall be operated continuously and data recorded during all periods of operation of the incinerator.	60.153(b)(4)

Recordkeeping	
Collect and analyze a grab sample of the sludge fed to the incinerator once per day.	60.153(b)(5)
Test methods and procedures for performance tests.	60.154
Install, calibrate, maintain, and operate continuous monitoring system.	60.13
Owner or operator of any multiple hearth, fluidized bed, or electric sludge incinerator subject to the provisions of this subpart, shall retain the following information and make it available for inspection for a minimum of two years: the measured pressure drop of the gas flow through the wet scrubbing device, a record of the measured oxygen content of the incinerator exhaust gas, record of the rate of sludge charged to the incinerator, the measured temperatures of the incinerator, the fuel flow to the incinerator, and the total solids and volatile solids content of the sludge charges to the incinerator.	60.153(c)(1)-(3)
The owner or operator of any sludge incinerator other than a multiple hearth, fluidized bed, or electric incinerator or any sludge incinerator equipped with a control device other than a wet scrubber shall submit for approval a plan for monitoring and recording incinerator and control device operation parameters.	60.153(e)
Maintain records for two years.	60.7(f)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.

Respondent Activities
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for wet scrubber.
Perform initial performance test, Reference Method 5, 9, and Method 2540G test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

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

Agency Activities
Observe initial performance tests and repeat performance test if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for two years.

5(c) Small Entity Flexibility

There are no small entities (i.e., small businesses) affected by this regulation.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping

and reporting requirements is estimated to be 9,690 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$138.43 (\$65.92+ 110%)
Technical	\$106.45 (\$50.69 + 110%)
Clerical	\$52.77 (\$25.13 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Particulate	\$100,000	0.4	\$40,000	\$35,000	86	\$3,010,000

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

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

The total capital/startup costs for this ICR are \$40,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$3,010,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$3,050,000. These are recordkeeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes such activities as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$74,400.

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

Managerial	\$64.16 (GS-13, Step 5, \$40.10 + 60%)
Technical	\$47.62 (GS-12, Step 1, \$29.76 + 60%)
Clerical	\$25.76 (GS-6, Step 3, \$16.10 + 60%)

These rates are from the Office of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal).

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next three years, approximately 86 existing respondents will be subject to the standard. The Agency estimated the total number of sources using data for the upcoming Federal Plan Requirements for Sewage Sludge Incineration Units. It is estimated that an additional 0.4 respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 86 per year.

The number of respondents is calculated using the following table that addresses the three

years covered by this ICR:

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0.4	86	0	0.4	86
2	0.4	86	0	0.4	86
3	0.4	86	0	0.4	86
Average	0.4	86	0	0.4	86

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 86.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	0.4	1	N/A	0.4
Notification of physical and operational changes	0.4	1	N/A	0.4
Notification of demonstration of CMS	0.4	1	N/A	0.4
Notification of actual startup	0.4	1	N/A	0.4
Notification of initial performance test	0.4	1	N/A	0.4
Semiannual report of excess emissions	86	2	N/A	172
			Total	174

The number of Total Annual Responses is 174.

The total annual labor costs are \$1,000,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

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

(i) Respondent Tally

The total annual labor hours are 9,690 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 56 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$3,050,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 1,600 labor hours at a cost of \$74,400. See below in Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

6(f) Reasons for Change in Burden

There is an adjustment decrease in the total estimated burden and O&M costs as currently

identified in the OMB Inventory of Approved Burdens. This decrease is not due to any program changes. The change in the burden and cost estimates occurred because the number of respondents has decreased as compared to the most-recently approved ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 56 hours per response. “Burden” means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2013-0310. An electronic version of the public docket is available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2013-0310 and OMB Control Number 2060-0035 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal)

Burden Items	(A) Person hours per Occurrence	(B) Number of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Number of respondents per year^a	(E) Technical person hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.1)	(H) Total costs per year^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with regulatory requirements ^{c,d}	1	1	1	86	86	4.3	8.6	\$10,203.77
B. Required Activities								
i. Initial performance test ^d	72	1	72	0.4	28.8	1.44	2.88	\$3,417.08
ii. Demonstration of monitoring system	See 3B(i)							
iii. Repeat of performance test ^e	72	1	72	0.08	5.76	0.29	0.58	\$683.42
C. Create Information	See 3B							
D. Gather Existing Information	N/A							
E. Write Report								
i. Notification of construction/ reconstruction ^d	2	1	2	0.4	0.8	0.04	0.08	\$94.92
ii. Notification of physical and operational changes ^f	2	1	2	0.4	0.8	0.04	0.08	\$94.92
iii. Notification of demonstration of CMS ^d	40	1	40	0.4	16	0.8	1.6	\$1,898.38
iv. Notification of actual startup ^d	2	1	2	0.4	0.8	0.04	0.08	\$94.92
v. Notification of initial performance test ^d	2	1	2	0.4	0.8	0.04	0.08	\$94.92
vi. Performance test report	See 3B							

vii. Semiannual reports of excess emissions ^g	40	2	80	86	6,880	344	688	\$816,301.68
Subtotal for Reporting Requirements					8,073			\$832,884
4. Recordkeeping Requirements								
A. Familiarize with regulatory requirements	See 3A							
B. Plan Activities	See 4E							
C. Implement Activities	See 4E							
D. Develop Record System	N/A							
E. Time to Enter Information								
i. Record of daily production rate and hours of operation ^h	8	1	8	86	688	34.4	68.8	\$81,630.17
ii. Records of startup, shutdown and malfunction	8	1	8	86	688	34.4	68.8	\$81,630.17
iii. Records of performance test data ^{d,i}	80	1	80	0.4	32	1.6	3.2	\$3,796.75
Subtotal for Recordkeeping Requirements					1,619			\$167,057
TOTAL LABOR BURDEN AND COST (rounded)^j					9,690			\$1,000,000
CAPITAL AND O&M COST (rounded)^j								\$3,050,000
GRAND TOTAL (rounded)^j								\$4,050,000

Assumptions:

^a This ICR assumes that there are 170 existing units at 86 facilities (respondents) and that 1.2 new, modified or reconstructed units will be constructed over the next three years (0.4 per year)

^b This ICR uses the following labor rates: \$138.43 per hour for Executive, Administrative, and Managerial labor; \$106.45 per hour for Technical labor, and \$52.77 per hour for Clerical labor. These rates are the United States Department of Labor, Bureau of Labor Statistics, September 2015, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rate has been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c This ICR assumes all existing facilities will have to re-familiarize with regulatory requirements each year

^d Assume that this is a one-time-only cost.

^e Assume that 20 percent would have to repeat the performance testing due to failure.

^f Assume that 0.4 facility will have a physical or operational change.

^g Assume that it will take 40 hours to write semiannual reports.

^h Assume that it will take eight hours per year to record daily gathering of monitoring data (which have been automatically recorded).

ⁱ Assume that it will take 80 hours per year to record performance test data.

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

Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Treatment Plants (40 CFR Part 60, Subpart O) (Renewal)

Activity	(A) EPA hours per occurrence	(B) No of occurrences per Plant per Year	(C) EPA Hours per Year (C=AxB)	(D) Plants per Year ^a	(E) Technical Hours per Year (E=CxD)	(F) Management Hours per Year (F=E \times 0.05)	(G) Clerical Hours per Year (G=E \times 0.1)	(H) Costs per Year ^b
Initial Performance Test ^c	24	1	24	0.4	9.6	0.48	0.96	\$512.68
Repeat initial performance test								
Retesting preparation ^{c,d}	24	1	24	0.08	1.92	0.10	0.19	\$102.54
Report Review								
Notification of construction/ reconstruction ^c	2	1	2	0.4	0.8	0.04	0.08	\$42.72
Notification of physical and operational changes ^e	2	1	2	0.4	0.8	0.04	0.08	\$42.72
Notification of actual startup ^c	0.5	1	0.5	0.4	0.2	0.01	0.02	\$10.68
Initial test ^c	0.5	1	0.5	0.4	0.2	0.01	0.02	\$10.68
Repeat performance test	8	1	8	0.4	3.2	0.16	0.32	\$170.89
Semiannual reports ^f	8	2	16	86	1,376	68.8	137.6	\$73,483.90
TOTAL LABOR BURDEN and COST (rounded)^g						1,600		\$74,400

Assumptions:

^a This ICR assumes that there are 170 existing units at 86 facilities (respondents) and that 1.2 new, modified or reconstructed units will be constructed over the next three years (0.4 per year)

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$64.16 for Managerial (GS-13, Step 5, \$40.10 x 1.6), \$47.62 for Technical (GS-12, Step 1, \$29.76 x 1.6) and \$25.76 Clerical (GS-6, Step 3, \$16.10 x 1.6). These rates are from the Office of Personnel Management (OPM) "2016 General Schedule" which excludes locality rates of pay.

^c Assume that this is a one-time-only cost.

^d Assume that 20 percent would have to repeat the performance testing due to failure.

^e Assume that 0.4 source will have a physical or operational change.

^f Assume that it will take eight hours to review semiannual reports.

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