

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV)

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV)

**1(b) Short Characterization/Abstract**

This supporting statement addresses information collection activities that will be imposed by amendments to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Publicly Owned Treatment Works, 40 CFR part 63, subpart VVV. The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) were proposed on December 1, 1998, promulgated on October 26, 1999, and most-recently amended on December 22, 2008. These regulations apply to both existing and new publicly owned treatment works (POTWs) located at a major source of hazardous air pollutants (HAPs), or to industrial POTWs that are either area or major sources. New facilities include those that either commenced construction or re-construction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart VVV.

This ICR includes the burden for activities that will be conducted in the first three years following promulgation of the POTW NESHAP amendments. These activities include reading the rule, developing an inspection and maintenance program, developing a program to demonstrate compliance with the requirements in the rule, and monitoring, recordkeeping, and reporting requirements.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, 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.

The term “Affected Public” applies to owners and operators of POTWs and their “burden” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (RTR). All of the facilities are owned and operated by either state, local, or tribal governments. 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 – NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (RTR).

Over the next three years, approximately six respondents per year will be subject to these

standards. No additional respondents per year will become subject to these same standards.

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 CAA Section 112, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants (HAP). These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, CAA Section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from POTWs either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart VVV.

### **2(b) Practical Utility/Users of the Data**

The information will be used by Designated Administrators' enforcement personnel to ensure that the requirements are being implemented and are complied with on a continuous basis. Specifically, the information will be used by the Designated Administrator to: (1) identify sources subject to the standards; (2) ensure that the POTW NESHAP is being properly applied; (3) ensure that the POTW NESHAP is being complied with; and (4) ensure, on a continuous basis, that the operating parameters established during performance tests are not exceeded.

In addition, records and reports are necessary to enable the Designated Administrator to identify POTW facilities that may not be in compliance with the standards. Based on reported information, the Designated Administrator can decide which facilities should be inspected and

what records or processes should be inspected. The records that facilities maintain would indicate to the Designated Administrator whether the personnel are operating and maintaining control equipment properly and whether they have met the qualification requirements.

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 the 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 either 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, that leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

The required annual 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 63, Subpart VVV.

#### **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, no duplication exists.

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

A public notice of this collection is provided in the Federal Register notice of rulemaking published for the POTW NESHAP RTR.

#### **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 the standard, 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.

Industry trade associations and other interested parties were provided with an opportunity to comment on the burden associated with the standard when it was being developed and further amended, and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. For the RTR, EPA contacted the National Association of Clean Water Agencies, at (202) 833-9106.

### **3(d) Effects of Less Frequent Collection**

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

### **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.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to these standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to either the destruction or nonexistence of essential records.

### **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 owners and operators of POTWs. The North American Industry Classification System code for the respondents affected by the standard is 221320 (Sewage Treatment Facilities), which corresponds to the United States Standard Industrial Classification code 4952 (Sewerage Systems).

### 4(b) Information Requested

#### (i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV).

A source must make the following notifications:

<b>Notifications</b>	
Initial notification	63.9(b), 63.1591(a)
Request for extension of compliance	63.9(c)
Notification of special compliance requirements	63.9(d)
Notification of initial performance tests	63.7(b), 63.9(e), 63.1590(b), 63.1591(b)
Additional notification requirements for sources with CMS	63.9(g)
Notification of compliance status	63.9(h), 63.1590(b)
Notification of adjustments to time periods for submitting required communications	63.9(i)
Notification of changes to information provided	63.9(j)

A source must make the following reports:

<b>Reports</b>	
Compliance Status	63.1591(b)
Initial performance test report	63.10(d)(2), 63.1590(b)
Inspection and monitoring plan	63.1590(e), 63.1590(f)
HAP fraction emitted report	63.1590(a)(2)
Pretreatment reports	63.1590(g)

A source must keep the following records:

<b>Recordkeeping</b>	
Record of annual inspections	63.1589 (a)(1)
Records of defects detected	63.1589(a)(2)
Records of defect repair delays	63.1589(a)(3)
Records of control devices covered by other NESHAPS	63.1590(a)(4)
Records of methods used to calculate annual HAP emissions	63.1589(b)(1)
Record of methods and data used to determine if POTW meets fraction emitted standard	63.1589(b)(2)
Records of methods and data that demonstrates POTW is in continuous compliance	63.1589(b)(3)
Pretreatment records	63.1589(c)
Maintain records for five years	63.10(b)(1)

### 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**

<b>Respondent Activities</b>
Familiarization with regulatory requirements.
Write the notifications and reports listed above.
Prepare required plans and perform initial performance test, if required.
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 the 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:

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests 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 Integrated Compliance Information System (ICIS) and Enforcement and Compliance History Online (ECHO).

### **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 annual 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 five years.

### **5(c) Small Entity Flexibility**

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

### **5(d) Collection Schedule**

In the first year following promulgation of the POTW NESHAP RTR owners or operators would read the rule and are required to submit an initial notification. We also anticipate the one-time and annual activities to include reading the rule, developing an inspection and maintenance program, developing a program to demonstrate compliance with the requirements in the rule, monitoring, recordkeeping, and reporting requirements, and the notification of compliance status (including performance tests results and operating parameter values) will occur for facilities starting in the first year.

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (RTR).

## **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 not conduct or 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 99 (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP 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	\$143.26 (\$68.21 + 110%)
Technical	\$108.61 (\$51.72 + 110%)
Clerical	\$52.88 (\$25.18 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics,

September 2016, “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 only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are no capital/startup or operation and maintenance (O&M) costs.

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

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or O&M 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 activities such 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 \$1,922.

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

Managerial	\$64.16 (GS-13, Step 5, \$40.10 + 60%)
Technical	\$47.61 (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 – NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (RTR).

### **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 six existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is six per year.

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

years covered by this ICR:

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(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	6	0	0	0	6
2	0	6	0	0	6
3	0	6	0	0	6
Average	2	4	0	0	6

<sup>1</sup> New respondents include 6 existing sources with new reporting requirements under the amended rule..

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 six.

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

<b>Total Annual Responses</b>				
(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
Initial notification	0	1	0	0
Notification of compliance status	6	1	0	6
Request for extension of compliance	0	1	0	0
Notification of special	0	1	0	0

<b>Total Annual Responses</b>				
compliance requirements				
Notification of initial performance test	0	1	0	0
Additional notification requirements for sources with CMS	0	1	0	0
Notification of adjustments to time periods	0	1	0	0
Notification of changes to information provided	0	1	0	0
Initial performance test report	0	1	0	0
Inspection and monitoring plan	0	1	0	0
Annual report	0	1	0	0
Excess emissions report	0	1	0	0
Initial report on compliance approach	6	1	0	6
			Total	12

CMS - Continuous Monitoring System

The number of Total Annual Responses is 12.

The total annual labor costs are \$10,530 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (RTR).

### **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 99 hours at a cost of \$10,530 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (RTR).

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 8.25 hours per response.

There are neither annual capital/startup nor O&M costs to this regulated entity.

### **(ii) The Agency Tally**

The average annual Agency burden and cost over the next three years is estimated to be 41 labor hours at a cost of \$1,922. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (RTR).

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 increase in the respondent burden from the most recently approved ICR. This increase is due to changes in the rule including a requirement for existing sources to meet a HAP fraction emitted limit, to develop a compliance plan for demonstrating compliance with the HAP fraction emitted limit, and to annually report the HAP fraction emitted.

There is also an increase in respondent and Agency burden costs from the most recently approved ICR due to the use of updated labor rates. This ICR references labor rates from the Bureau of Labor Statistics to calculate respondent burden costs, and references labor rates from OPM to calculate Agency burden costs.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 8.25 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 not conduct or 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-OAR-2016-0490. 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-2014-0071 and OMB Control Number 2060-0428 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 – NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (RTR)**

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarization with rule requirements <sup>c</sup>	0.5	1	1	6	3	0.2	0.3	363
B. Required activities								
Initial notification	2	1	2	0	0	0	0	0
Notification of compliance status <sup>d</sup>	2	1	2	6	12	1	1	1,453
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write reports								
Request for extension of compliance	2	1	2	0	0	0	0	0
Notification of special compliance requirements	2	1	2	0	0	0	0	0
Notification of initial performance test <sup>d</sup>	N/A							
Additional notification requirements for source with CMS	2	1	2	0	0	0	0	0
Notification of adjustments to time periods	2	1	2	0	0	0	0	0
Notification of changes to information provided	2	1	2	0	0	0	0	0
Initial performance test report <sup>d</sup>	N/A							
Inspection and monitoring plan <sup>d</sup>	N/A							
Annual report	1	2	2	0	0	0.0	0.0	0

Excess emissions report	2	1	2	0	0	0	0	0
HAP fraction emitted report	4	1	4	6	24	1	2	2,905
Initial report on compliance approach	4	1	4	6	24	1	2	2,905
<b>Reporting Subtotal</b>						<b>72</b>		<b>7,627</b>
4. Recordkeeping								
A. Familiarization with rule requirements	See 3A							
B. Plan activities	See 3E							
C. Implement activities	See 3E							
D. Develop record system	See 3E							
E. Time to enter information								
Records of annual inspections <sup>d</sup>	2	1	2	0	0	0	0	0
Records of inspections, defects, and repair delays <sup>d</sup>	2	1	2	0	0	0	0	0
Methods and data used to determine compliance and emissions <sup>d</sup>	2	1	4	6	24	1	2	2,905
F. Time to transmit or disclose information	N/A							
G. Time to train personnel	N/A							
H. Time for audits	N/A							
<b>Recordkeeping Subtotal</b>						<b>27</b>		<b>2,905</b>
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED) <sup>e</sup></b>						<b>99</b>		<b>10,530</b>
<b>TOTAL ANNUAL CAPITAL AND O&amp;M COST (SEE SECTION 6(b)(iii))</b>								<b>0</b>
<b>GRAND TOTAL (LABOR, CAPITAL, AND O&amp;M) <sup>e</sup></b>								<b>10,530</b>

CMS - Continuous Monitoring System

N/A - Not Applicable

**Assumptions:**

a EPA estimates six existing sources will now be subject to reporting requirements. We do not expect any new sources will become subject to the rule over the next three years.

b This ICR uses the following labor rates: \$108.61 (technical), \$143.26 (managerial), and \$52.88 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2016, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<http://www.bls.gov/news.release/ecec.t02.htm>

c This burden represents the time existing respondents spend familiarizing themselves with the rule amendments.

d The proposed rule revisions now require additional recordkeeping and reporting from 4 existing, non-industrial POTWs and from 2 existing, industrial POTWs.

e Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Publicly Owned Treatment Works (40 CFR Part 63, Subpart VVV) (RTR)**

Burden item	A	B	C	D	E	F	G	H
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>
Initial performance test <sup>c</sup>	N/A							
Repeat initial performance test <sup>c</sup>	N/A							
Report review								
Initial notification	2	1	2	0	0	0	0	0
Notification of compliance status <sup>c</sup>	2	1	2	6	12	1	1	641
Request for extension of compliance	0.5	1	1	0	0	0	0	0
Notification of special compliance requirements	2	1	2	0	0	0	0	0
Notification of initial performance test <sup>c</sup>	2	1	2	0	0	0	0	0
Additional notification requirements for sources with CMS	2	1	2	0	0	0	0	0
Notification of adjustments to time periods	2	1	2	0	0	0	0	0
Notification of changes to information provided	2	1	2	0	0	0	0	0
Initial performance test report <sup>c</sup>	N/A							
Inspection and monitoring plan <sup>c</sup>	N/A							
Annual report	1	2	2	0	0	0.0	0.0	0.00
Excess emissions report	N/A							
HAP fraction emitted report	2	1	2	6	12	1	1	641
Initial report on compliance approach	2	1	2	6	12	1	1	641
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED) <sup>d</sup></b>						<b>41</b>		<b>1,922</b>

CMS - Continuous Monitoring System

N/A - Not Applicable

**Assumptions:**

- a EPA estimates an average of six existing sources will be subject to the standard. We do not expect any new sources will become subject to the rule over the next three years.
- <sup>b</sup> This ICR uses the following labor rates: \$47.60 (technical), \$64.16 (managerial), and \$25.76 (clerical). 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.
- c Existing sources are now subject to rule emission limits and related performance testing (if applicable), plan development, and reporting activities.
- d Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.