

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal), EPA ICR Number 2403.04, OMB Control Number 2060-0661.

1(b) Short Characterization/Abstract

The Emission Guidelines for Sewage Sludge Incinerators (SSI) for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) were proposed on October 14, 2010, and promulgated on March 21, 2011. These regulations apply to the administrators of air quality programs in a state or U.S. protectorate with one or more SSI units that commenced construction either on or before the date of proposal. States may choose to incorporate the model rule text directly in their state plan. If a State does not develop, adopt, and submit an approvable State plan, the Environmental Protection Agency (EPA) must develop a Federal plan to implement the emission guidelines. These regulations do not directly apply to SSI unit owners and operators. However, SSI unit owners and operators must comply with the state plan to implement the emission guidelines contained in this Subpart. This ICR presents the ‘burden’ to both respondents (owners or operators of SSI units) and the Designated Administrator (either state or Federal government) to implement the emission guidelines imposed by the State plans. These standards only affect existing units constructed on or before October 14, 2010; therefore, no new units will become subject to these same standards. This information is being collected to assure compliance with 40 CFR Part 60, Subpart M.

In general, all emission guidelines 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 emission guidelines.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents, and retain the file for at least five 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.

The “Affected Public” are owners and operators of existing SSI units. All of the respondents are publicly-owned by either state, local, or tribal governments. None of the SSI

facilities in the United States are owned by the private sector. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal). The Federal Government’s “burden” 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 – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal).

Based on our consultations with industry representatives, there are an average of 1.98 affected facilities 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 170 SSI units per year at 86 facilities will be subject to these standards, and 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 section 111(d)(1) of the Clean Air Act (CAA), as amended, to:

. . . prescribe regulations which shall establish a procedure similar to that provided by section 110 under which each State shall submit to the Administrator a plan which (A) establishes standards of performance for any existing source for any air pollutant (i) for which air quality criteria have not been issued or which is not included on a list published under section 108(a) . . . but (ii) to which a standard of performance under this section would apply if such existing source were a new source, and (B) provides for the implementation and enforcement of such standards of performance.

The EPA is required under section 129 of the Act, to establish guidelines for existing stationary sources that reflect the maximum achievable control technology (MACT) for achieving continuous emission reductions:

Section 129(a)(1)(A) states:

The Administrator shall establish performance standards and other

requirements pursuant to section 111 and this section for each category of solid waste incineration units. Such standards shall include emissions limitations and other requirements applicable to new units and guidelines (under section 111(d) and this section) and other requirements applicable to existing units.

Section 129(a)(2) states:

Standards applicable to solid waste incineration units promulgated under section 111 and this section shall reflect the maximum degree of reduction in emissions of air pollutants listed under section (a)(4) that the Administrator, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable for new or existing units in each category.

Section 129(b)(1) states:

Performance standards under this section and section 111 for solid waste incineration units shall include guidelines promulgated pursuant to section 111(d) and this section applicable to existing units. Such guidelines shall include, as provided in this section, each of the elements required by subsection (a) (emissions limitations, notwithstanding any restriction in section 111(d) regarding issuance of such limitations), subsection (c) (monitoring), subsection (d) (operator training), subsection (e) (permits), and subsection (h)(4) (residual risk).

Subpart B of 40 CFR part 60 requires State plans to include monitoring, recordkeeping, and reporting provisions consistent with the emission guidelines. In addition, section 114(a)(1) states that:

the Administrator may require any person who owns or operates any emission source, who manufactures emission control equipment or process equipment, who the Administrator believes may have information necessary for the purposes set forth in this subsection, or who is subject to any requirement of this Act (other than a manufacturer subject to the provisions of section 206(c) or 208 with respect to a provision of title II) on a one-time, periodic or continuous basis to -

- (A) establish and maintain such records;
- (B) make such reports;
- (C) install, use, and maintain such monitoring

equipment, and use such audit procedures, or methods;

(D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods and in such manner as the Administrator shall prescribe);

(E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical;

(F) submit compliance certifications in accordance with section 114(a)(3); and

(G) provide such other information, as the Administrator may reasonably require;

In the Administrator's judgment, particulate matter (PM), hydrogen chloride (HCl), carbon monoxide (CO), dioxin/furan, mercury (Hg), oxides of nitrogen (NO_x), sulfur dioxide (SO₂), cadmium, lead, and fugitive emissions from SSI either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the emission guidelines were promulgated for this source category at 40 CFR Part 60, Subpart M.

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 the emission standards. Continuous emission monitors are used to ensure compliance with these standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in 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 these standards are being met. The performance test may also be observed.

The required annual and 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 MMMM.

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 (82 FR 29552) on June 29, 2017. 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 reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the National Association of Clean Water Agencies (NACWA), at (202) 833-2672; and 2) the National Waste & Recycling Association (NWRA), at (202) 244-4700.

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.

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 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 these standards 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 SSI units. The United States Standard Industrial Classification (SIC) codes for the respondents affected by these standards and the corresponding North American Industry Classification System (NAICS) codes can be found in the table below.

40 CFR Part 60, Subpart M	SIC Codes	NAICS Codes
Water Supply and Irrigation Systems	4941	221310
Sewage Treatment Facilities	4952	221320

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M).

A source must make the following reports:

Notifications/Reports	
Increments of progress report	60.5235(a)
Initial compliance report including initial performance test result, CMS performance evaluation, site-specific operating limits, documentation of installation of bag leak detection system for fabric filter, and results of air pollution control device inspection	60.5235(b)
Annual compliance report	60.5235(c)
Deviation reports	60.5235(d)
Notification of qualified operator deviation	60.5235(e)(i)
Status report of qualified operator deviation	60.5235(e)(ii)
Notification of a force majeure	60.5235(f)
Notification for intent to start or stop use of a CMS	60.5235(g)
Notification of intent to conduct a performance test	60.5235(g)
Notification of intent to reschedule a performance test	60.5235(g)

A source must keep the following records:

Recordkeeping	
5-year retention of records.	60.5230
Calendar date of each record.	60.5230(a)
Records of increments of progress. Includes copies of the final control plan and any additional notifications.	60.5230(b)
Records of site-specific information and incinerator operation	60.5230(c)(1)

Recordkeeping	
procedures.	
Records of names of persons who have completed review of the site-specific information and incinerator operating procedures in 60.5230(c)(1).	60.5230(c)(2)
Records of names of persons who have completed the operator training requirements. Includes documentation of the training and the dates of the training.	60.5230(c)(2)
Records showing the periods when no qualified operators were accessible for more than 8 hours, but less than two weeks.	60.5230(c)(3)
Records showing the periods when no qualified operators were accessible for two weeks or more.	60.5230(c)(4)
Records of control device inspections.	60.5230(d)
Records of initial performance tests, annual performance tests, and any subsequent performance tests.	60.5230(e)
Records of all continuous monitoring data; includes continuous emissions monitors, continuous automated sampling systems, and continuous parameter monitors.	60.5230(f)
Records of other info for continuous monitoring systems.	60.5230(g)
Records of days when a deviation from the operating limits have occurred. Includes a description of the deviation and a description of the corrective actions taken.	60.5230(h)
Equipment vendor specifications for the incinerator, emission controls, and monitoring equipment.	60.5230(i)
Records of calibration of any monitoring devices.	60.5230(j)
Records of monitoring plan and performance evaluations.	60.5230(k)
Records of less frequent testing.	60.5230(l)
Records of use of bypass stack.	60.5230(m)
Record of malfunctions.	60.5230(n)

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.

As of January 1, 2012, respondents must submit relative accuracy test audit (i.e., reference method) data and performance test (i.e., compliance test) data, except opacity data, electronically to EPA's Central Data Exchange (CDX) by using the Electronic Reporting Tool (ERT) or other compatible electronic spreadsheet. Only data collected using test methods compatible with ERT are subject to this requirement, which is to be submitted electronically into EPA's WebFIRE database.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, CO, PM, or for continuous parameter monitoring (including CEMS).
Perform initial performance test, Reference Method 5, 6, 6C, 7, 7E, 10, 10A, 10B, 22, 23, 26A, 29, 30B tests, 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.
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
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 standards, 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 and 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 five years.

5(c) Small Entity Flexibility

A 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 these regulations. The emission guidelines do not contain any provisions reserved exclusively for the benefit of small entities. However, the emission guidelines do contain provisions that reduce the impact on all regulated entities, which would include any small entities. The owner or operator is allowed to conduct performance tests once every three years to show compliance if certain criteria are met. Deviation reports are required only if there is a deviation, otherwise reporting is annual, and operating parameter monitoring is required, instead of continuous emissions monitoring systems (CEMS).

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

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (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 32,800 hours (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of these regulations, Agency knowledge and experience with the emission guidelines 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	\$144.33 (\$68.73+ 110%)
Technical	\$108.28 (\$51.56 + 110%)
Clerical	\$53.34 (\$25.40 + 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 type of industry costs associated with the information collection activities in the subject standards are both labor costs, which are addressed elsewhere in this ICR, and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to these regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and 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)
Fluidized Bed ^a						
PBS parameter monitors	\$24,300	0	\$0	\$5,600	6	\$33,600
SNCR monitors	\$10,300	0	\$0	\$3,200	2	\$6,400
Initial and annual stack test ^b	\$61,740	0	\$0	\$21,348	18	\$384,264
Multiple Hearth ^a						
PBS parameter monitors	\$24,300	0	\$0	\$5,600	8	\$44,800
Initial and annual stack test ^b	\$61,740	0	\$0	\$23,302	38	\$885,476
Total ^c			\$0			\$1,350,000

^a There are a total of 55 fluidized bed units and 114 multiple hearth units.

^b Facilities may test every three years if certain requirements are met, thus annual testing is divided by three to give a per year cost. It is assumed most facilities would meet the requirements. Annual fluidized bed tests = $55 / 3 = 18.33$, rounded to 18 tests per year. Annual multiple hearth tests = $114 / 3 = 38$ tests per year.

^c 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 \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$1,350,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$1,350,000. 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 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 \$157,000.

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

Managerial	\$64.80 (GS-13, Step 5, \$40.50 + 60%)
Technical	\$48.08 (GS-12, Step 1, \$30.05 + 60%)
Clerical	\$26.02 (GS-6, Step 3, \$16.26 + 60%)

These rates are from the Office of Personnel Management (OPM), 2017 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 – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart Mmmm) (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 these standards. It is estimated that no additional respondents per year will become subject to these same standards. 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	86	0	0	86

Number of Respondents					
2	0	86	0	0	86
3	0	86	0	0	86
Average	0	86	0	0	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 performance test	0	1	0	0
Notification of CMS demonstration	0	1	0	0
Final control plan	0	1	0	0
Initial compliance report	0	1	0	0
Annual stack test ^a	56	1	0	56
Annual compliance report ^b	170	1	0	170
Qualified operator notification ^c	9	1	0	9
Qualified operator status report ^c	9	2	0	18
Semiannual Deviation Report ^d	9	2	0	18
			Total	271

^a Facilities may test every three years if certain requirements are met, thus annual testing is divided by three to give a per year cost. It is assumed most facilities would meet the requirements. Number of tests per year = $170 / 3 = 56.1$, rounded to 56 tests per year.

^b Based on the number of SSI units.

^c Assumed that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year. We assumed that this required only two status reports. $86 \text{ facilities} \times 10\% = 8.6$, rounded to 9 facilities.

^d Assumed that 10 percent of the facilities would have an exceedance during the year. $86 \text{ facilities} \times 10\% = 8.6$, rounded to 9 facilities.

The number of Total Annual Responses is 271.

The total annual labor costs are \$3,440,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – Emission Guidelines for Sewage

Sludge Incinerators (40 CFR Part 60, Subpart M) (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 in Tables 1 and 2 below, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 32,800 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (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 121 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$1,350,000. 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 3,110 labor hours at a cost of \$157,000; see below in Table 2: Average Annual EPA Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (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 increase in the labor hours and costs as compared to the previously-approved ICR. The increase is not due to any program changes. Instead, the increase in labor burden and costs occurred for two reasons: 1) this ICR assumes all respondents will have to familiarize with the regulatory requirements each year; and 2) this ICR fixes an error in the previous ICR, which did not include recordkeeping burden for operating parameters.

However, there is an adjustment decrease in the total capital and O&M costs and number of responses as compared to the previous ICR. The decrease occurred for two reasons: 1) the total number of SSI units has decreased since the previous ICR; and 2) this ICR assumes fixes an error in the previous ICR to correctly reflect the assumption that all facilities will meet the requirements to perform testing on a reduced schedule (every three years) rather than annual testing.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 121 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-2013-0311. 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-2013-0311 and OMB Control Number 2060-0661 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 – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart MMMM) (Renewal)

Burden Item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Respondent Hours per Occurrence	Number of Occurrences Per Respondent Per Year	Hours Per Respondent Per Year (C=AxB)	Number of Respondents Per Year ^a	Technical Hours Per Year (E=CxD)	Management Hours Per Year (F=Ex0.05)	Clerical Hours Per Year (G=Ex0.1)	Total Costs, \$ ^b
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with the regulatory requirements ^{c, d}	40	1	40	86	3,440	172	344	\$415,657
B. Required Activities								
1) Initial stack test and report ^e	40	1	40	0	0	0	0	\$0
2) Annual stack test and test report ^{f, g}	40	0.33	13.2	170	2,244	112.2	224.4	\$271,143.64
3) Operator training and qualification								
a) Establish and teach operator qualification course ^{d, e}	64	1	64	0	0	0	0	\$0
b) Obtain operator qualification ^{d, e}	72	1	72	0	0	0	0	\$0
c) Annual refresher course ^{d, f}	12	1	12	86	1,032	51.6	103.2	\$124,697.08
d) Initial review of site-specific information	See 3B 3) a)							
e) Annual review of site-specific information ^{d, f}	8	1	8	86	688	34.4	68.8	\$83,131.38
4) Establish operating parameters (maximum and minimum) ^e	40	1	40	0	0	0	0	\$0
5) Continuous parameter monitoring (including CEMS)								
a) Initial monitoring ^e	11	1	11	0	0	0	0	\$0
b) Annual monitoring ^f	11	1	11	170	1,870	93.5	187	\$225,953.04

C. Create Information	See 3B							
D. Gather Information	See 3E							
E. Report Preparation								
1) Notification of initial performance test ^e	2	1	2	0	0	0	0	\$0
2) Notification of initial CMS Demonstration ^{d,e}	2	1	2	0	0	0	0	\$0
3) Final Control Plan ^e	20	1	20	0	0	0	0	\$0
4) Initial Compliance Report ^e	40	1	40	0	0	0	0	\$0
5) Report for site-specific parameter petition ^{e,h}	14	1	14	0	0	0	0	\$0
6) Annual Compliance Report	40	1	40	170	6,800	340	680	\$821,647.40
7) Notification for operators that are off-site for more than 2 weeks ⁱ	8	1	8	9	72	3.6	7.2	\$8,699.80
8) Status report for operators that are off-site for more than 2 weeks ⁱ	8	2	16	9	144	7.2	14.4	\$17,399.59
9) Semiannual Deviation Report ^j	24	2	48	9	432	21.6	43.2	\$52,198.78
Subtotal for Reporting Requirements						19,230		\$2,020,528
4. Recordkeeping Requirements								
A. Familiarize with the regulatory requirements	See 3A							
B. Plan Activities	N/A							
C. Implement Activities	N/A							
D. Develop Record System	N/A							
E. Record Information								
1) Records of operating parameters	2	52	104	86	8,944	447.2	894.4	\$1,080,708
2) Records of exceedances of the operating parameters ^j	2	1	2	9	18	0.9	1.8	\$2,174.95
3) Records of stack tests ^s	2	0.33	0.66	86	56.76	2.84	5.68	\$6,858.34
4) Records of persons who have reviewed operating procedures	2	1	2	86	172	8.6	17.2	\$20,782.85
5) Records of persons who have completed operator training	2	1	2	86	172	8.6	17.2	\$20,782.85

6) Records of persons who meet operator qualification criteria	2	1	2	86	172	8.6	17.2	\$20,782.85
7) Records of monitoring device calibration	2	1	2	86	172	8.6	17.2	\$20,782.85
8) Records of site-specific documentation	24	1	24	86	2,064	103.2	206.4	\$249,394.15
F. Personnel Training	See 3B							
G. Time for Audits	N/A							
Subtotal for Recordkeeping Requirements						13,536		\$1,422,267
TOTAL ANNUAL BURDEN AND COST (rounded) ^k						32,800		\$3,440,000
TOTAL CAPITAL AND O&M COST (rounded) ^k								\$1,350,000
GRAND TOTAL (rounded) ^k								\$4,790,000

Assumptions:

^a We have assumed that there will be an average of 170 units at 86 facilities that will be subject to the rule. Because the standard only affects existing units constructed on or before October 14, 2010; there will be no new units subject to the rule.

^b This ICR uses the following labor rates: \$144.33 per hour for Executive, Administrative, and Managerial labor; \$108.28 per hour for Technical labor, and \$53.34 per hour for Clerical labor. 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.

^c We have assumed that all existing respondents will have to familiarize with the regulatory requirements each year.

^d Cost incurred by a facility regardless of the number of affected units at the plant.

^e This is a one-time only costs.

^f Annual costs are not incurred until the second year of operation.

^g Facilities may test every three years if certain requirements are met, thus annual testing is divided by three to give a per year cost. It is assumed most facilities would meet the requirements.

^h Assumed that none of the facilities will petition for site-specific parameters.

ⁱ Assumed that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year ($86 \times 10\% = 8.6$, rounded to 9 facilities). Assumed that this required only two status reports.

^j Assumed that 10 percent of the facilities would have an exceedance during the year ($86 \times 10\% = 8.6$, rounded to 9 facilities).

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

Table 2: Average Annual EPA Burden and Cost – Emission Guidelines for Sewage Sludge Incinerators (40 CFR Part 60, Subpart M) (Renewal)

Burden Item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA Hours per Occurrence	Number of Occurrences Per Respondent Per Year	EPA Hours Per Respondent Per Year (C=AxB)	Number of Respondents Per Year ^a	Technical Hours Per Year (E=CxD)	Management Hours Per Year (F=Ex0.05)	Clerical Hours Per Year (G=Ex0.1)	Total Costs, \$ ^b
1. Applications	N/A							
2. Read and Understand Rule Requirements	40	1	40	0	0	0	0	\$0
3. Required Activities								
A. Observe stack tests ^a	48	1	48	11	528	26.4	52.8	\$28,470.82
B. Excess emissions -- Enforcement Activities ^b	24	1	24	9	216	10.8	21.6	\$11,647.15
C. Create Information	N/A							
D. Gather Information	N/A							
E. Report Reviews								
1) Review initial notifications	20	1	20	0	0	0	0	\$0
2) Review initial compliance report	40	1	40	0	0	0	0	\$0
3) Review annual compliance report	8	1	8	170	1,360	68	136	\$73,333.92
4) Review semiannual excess emission and parameter exceedance report ^b	16	2	32	9	288	14.4	28.8	\$15,529.54
5) Review notification and status reports for operators off-site ^c	4	3	12	9	108	5.4	10.8	\$5,823.58
F. Prepare annual summary report	200	1	200	1	200	10	20	\$10,784.40
5. Travel expenses: (1 person * 48 hours per trip / 8 hours per day * \$75 per diem) + (\$600 per round trip) = \$1,050 per trip (\$1,050 per trip x 11 trips) = \$11,550								\$11,550.00
TOTAL ANNUAL BURDEN AND COST (rounded)^d						3,110		\$157,000

Assumptions:

- ^a We assume that EPA personnel attends 20 percent of the stack tests. Facilities may test every three years if certain requirements are met, thus annual testing is divided by three to give a per year cost. It is assumed most facilities would meet the requirements. $(170 \text{ units per year} \times 0.33 \text{ stack test/unit} \times 20\%) = 11.33$, rounded to 11 stack tests per year)
- ^b We assume that 10 percent of the facilities would have an exceedance during the year $(86 \times 10\% = 8.6$, rounded to 9 facilities).
- ^c We assume that 10 percent of the facilities would not have a qualified operator available for more than two weeks at least once a year. We assume that this will require only two status reports, resulting in a total of 3 reports (1 notification and 2 status reports).
- ^d Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.