

Table 1: Annual Respondent Burden and Cost – NSPS for Sewage Sludge Incineration U

Burden Item	A	B	C
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting Requirements			
A. Familiarize with regulation requirements			
1) New sources ^c	40	1	40
2) Existing sources ^d	4	1	4
B. Required activities			
1) Initial stack test and report (new sources) ^c	40	1	40
2) Annual stack test and test report (existing sources) ^{d, e}	40	0.33	13.2
3) Operator training and qualification			
a) Establish and teach operator qualification course ^{c, f}	64	1	64
b) Obtain operator qualification ^{c, f}	72	1	72
c) Annual refresher course ^d	12	1	12
d) Initial review of site-specific information	See 3A		
e) Annual review of site-specific information (existing sources) ^d	8	1	8
4) Establish maximum and minimum operating parameters (new sources) ^c	40	1	40
5) Continuous parameter monitoring (including CEMS) ^d	11	1	11
C. Create Information	See 3B		
D. Gather Existing Information	See 3E		
E. Write report			
1) Notification of construction (includes siting analysis) ^c	160	1	160
2) Notification of start-up (includes monitoring plan) ^c	40	1	40
3) Notification of initial performance test ^c	2	1	2
4) Notification of initial CMS Demonstration ^c	2	1	2
5) Initial Compliance Report	40	1	40
6) Annual Compliance Report	40	1	40
7) Status report for operators that are off-site for more than 2 weeks ^g	8	1	8
8) Corrective action summary for operators that are off-site for more than 2 weeks ^g	8	2	16
9) Semiannual Deviation Report ^h	24	2	48
Subtotal for Reporting Requirements			
4. Recordkeeping Requirements			
A. Familiarize with regulation 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
2) Records of exceedances of the operating parameters ^h	2	1	2
3) Records of stack tests	2	1	2
4) Records of siting analysis	2	1	2
5) Records of persons who have reviewed operating procedures	2	1	2
6) Records of persons who have completed operator training	2	1	2
7) Records of persons who meet operator qualification criteria	2	1	2
8) Records of monitoring device calibration	2	1	2
9) Records of site-specific documentation	24	1	24
F. Time to train personnel	See 3B		
G. Time for audits	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COSTS (rounded)ⁱ			
TOTAL CAPITAL AND O&M COSTS (rounded)ⁱ			
GRAND TOTAL (rounded)ⁱ			

Assumptions:

^a We assume there are 7 existing facilities with 6 incineration units each. Burden estimates are based on a "per re total of 2 new sources and 1 modified source over the next three-year period, averaging to 1 new respondent per y

^b This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical lal 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to acc

^c One-time only costs for new sources.

^d Annual Costs for existing sources. Annual costs are not incurred until the second year of operation.

^e Existing facilities may test every three years if certain requirements are met, and it is assumed that all facilities year (7 x 0.33 = 2.31) perform annual testing following the initial performance test.

^f Costs incurred by a facility regardless of the number of affected units at the plant.

^g We assume that 10 percent of the facilities would not have a qualified operator available for more than two wee two corrective action summaries.

^h We assume that 10 percent of the facilities would have an exceedance during the year.

ⁱ Totals are rounded to 3 significant figures. Figures may not add exactly due to rounding.

Units (40 CFR Part 60, Subpart LLLL) (Renewal)

D	E	F	G	H
Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex 0.05)	Clerical hours per year (Ex 0.10)	Total cost per year ^b
1	40	2	4	\$2,217.84
7	28	1.4	3	\$1,552.49
1	40	2	4	\$2,217.84
2.3	30	1.5	3	\$1,690.66
1	64	3	6	\$3,548.54
1	72	4	7	\$3,992.11
7	84	4	8	\$4,657.46
7	56	3	6	\$3,104.98
1	40	2	4	\$2,217.84
7	77	4	8	\$4,269.34
1	160	8	16	\$8,871.36
1	40	2	4	\$2,217.84
1	2	0.1	0.2	\$110.89
1	2	0.1	0.2	\$110.89
1	40	2	4	\$2,217.84
7	280	14	28	\$15,524.88
0.7	5.6	0.3	0.6	\$310.50
0.7	11.2	0.6	1.1	\$621.00
0.7	34	1.7	3.4	\$1,862.99
	1,272			\$61,317

2019 Labor Rates	
Technical	\$49.44
Management	\$66.62
Clerical	\$26.75

Table 2: Average Annual EPA Burden and Cost – NSPS for Sewage Sludge Incineration Units (LLLL) (Renewal)

Burden Item	A	B	C	D	E
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)
1. Applications	N/A				
2. Required Activities					
A. Observe stack tests ^c	48	1	48	0.5	23.832
B. Excess emissions - Enforcement activities	24	1	24	1	24
C. Create Information	N/A				
D. Gather Information	N/A				
E. Report Reviews					
1) Review initial notifications ^d	40	2	80	1	80
2) Review initial compliance report	40	1	40	1	40
3) Review annual compliance report	8	1	8	7	56
4) Review semi-annual excess emission and parameter exceedance report	16	2	32	0.7	22.4
5) Review status reports and corrective action summary for operators off-site	4	1	4	0.7	2.8
F. Prepare annual summary report ^e	4	1	4	7	28
TOTAL COST (rounded) ^f					

Assumptions:

^a We assume there are 7 existing facilities with 6 incineration units each. Burden estimates are based on a "per respondent" basis. We assume that there will be a total of 2 new sources and 1 modified source over the next three-year period, averaging to 1 new source based on EPA's 2016 SSI Inventory.

^b This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical labor. The Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60% to reflect packages available to government employees.

^c Assumes EPA personnel attend 15 percent of the stack tests. New facilities do stack testing. Existing facilities may test or be met, and it is assumed that all facilities would meet the requirements. (((1 new facility + (7 existing facilities x 0.33)))

^d Includes notification of construction, notification of start-up for new units, notification of initial performance test, and reporting.

^e We assume four hours per state to write annual summary report.

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

(40 CFR Part 60, Subpart

F	G	H
Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year^b
1.1916	2.3832	\$1,321.39
1.2	2.4	\$1,330.70
4	8	\$4,435.68
2	4	\$2,217.84
2.8	5.6	\$3,104.98
1.12	2.24	\$1,241.99
0.14	0.28	\$155.25
1.4	2.8	\$1,552.49
319		\$15,400

Labor Rates	
Technical	\$49.44
Management	\$66.62
Clerical	\$26.75

it" basis, not a "per unit" basis. We
 ew respondent per year. Estimates are

se rates are from the Office of Personnel
 percent to account for the benefit

every three years if certain requirements
 x 0.15) = 0.5 tests observed per year)

notification of initial CMS demonstration.

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

(A)	(B)	(C)	(D)	(E)	(F)
Item	Capital/Startup Cost for One Respondent	Number of New Respondents ^a	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M
CEMS/CPMS ^b	\$226,946	1	\$226,946	\$81,160	7
Stack testing ^c	\$61,350	1	\$61,350	\$61,350	2.31
Filing cabinet ^d	\$100	1	\$100		
Total			\$288,000		

^a We assume that there are 7 existing facilities with an average of 6 incinerator units. Burden estimates are based on a "1" basis. We assume that there will be a total of 2 new sources and 1 modified source over the next three-year period, average estimates are based on EPA's 2016 SSI Inventory

^b Based on estimated monitoring costs provided in regulatory support documentation.

^c Total estimated cost for initial stack test, including Method 5 (PM), Method 9 (opacity), Method 10 (CO), Method 26 (CDD/CDF), Method 7E (NO_x), and Method 6C (SO₂). Existing facilities may test every three years if certain requirements would meet the requirements. Thus, on average 2.31 existing sources per year ($7 * 0.33 = 2.31$) perform annual test.

^d Assumed \$100 for purchase of filing cabinet to store copy of rule, records, and report copies.

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

Number of Respondents

Year	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A) Number of New Respondents ^a	(B) Number of Existing Respondents ^b	(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	1	6	0	0	7
2	1	7	0	0	8
3	1	8	0	0	9
Average	1	7	0	0	8

^a We assume there will be 2 new sources and 1 modified source over the next three years, averaging to 1 new respondent per year.

^b Assumed there are 7 existing facilities with 6 units each on average. Based on EPA's 2016 SSI Inventory.

Total Annual Responses

(A) Information Collection Activity	(B) Average 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	1	1	0	1
Notification of Start-up	1	1	0	1
Notification of Initial Performance Test	1	1	0	1
Notification of Initial CMS Demonstration	1	1	0	1
Initial Compliance Report	1	1	0	1
Annual Compliance Report ^a	7	1	0	7
Status report for operators that are off-site for more than 2 weeks ^b	0.7	1	0	0.7
Corrective action summary for operators that are off-site for more than 2 weeks ^b	0.7	2	0	1.4
Semiannual Deviation Report ^c	0.7	2	0	1.4
			Total (rounded)	16

^a Facilities may test every three years if certain requirements are met, and it is assumed most facilities would meet the requirements. However, annual compliance reports must be submitted regardless of whether a performance test is conducted during the reporting period.

^b 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 further assume this would require only two corrective action summaries.

^c We assume that 10 percent of the existing facilities ($7 * 0.1 = 0.7$) have excess emissions and submit semiannual deviation reports.

(G)			
Total O&M, (E X F)			
\$568,120	\$243,480		
\$141,719	60,737	\$304,217	
	total		
\$710,000	\$998,000		

per respondent" basis, not a "per unit"
 going to 1 new respondent per year.

HCl), Method 29 (metals), Method 23
 ents are met, and it is assumed most
 testing following the initial performance