

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for the Phosphate Fertilizer Industry

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for the Phosphate Fertilizer Industry (40 CFR part 60, subparts T, U, V, W, and X)
(Renewal)

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for the regulations published at 40 CFR part 60, subparts T, U, V, W, and X were proposed on October 22, 1974, and promulgated on August 6, 1975. These standards apply to each wet-process phosphoric acid plant, each superphosphoric acid plant, each granular diammonium phosphate plant, and each triple superphosphate plant, having a design capacity of more than 15 tons of equivalent phosphorous pentoxide (P₂O₅) feed per calendar day. These standards also apply to granular triple superphosphate storage facilities. These standards establish fluoride emission limitations as a measure of phosphorus-bearing feed material at affected facilities. The affected facilities may include a combination of reactors, filters, evaporators, hot wells, acid sumps, cooling tanks, granulators, dryers, coolers, screens, mills, mixers, curing belts (dens), cookers, and facilities which store run-of-pile triple superphosphate, depending on the type of plant.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports. Owners or operators 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 sources subject to NSPS.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two 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 United States Environmental Protection Agency (EPA) regional office.

Approximately 13 sources are currently subject to the regulation, and it is estimated that no new sources will become subject to the regulation over the next three years. In order to comply with the recordkeeping and reporting requirements standard, the respondents will expend approximately 1,194 hours and \$320,000 per year.

These figures are based on queries conducted on the AIRS Facility Subsystem through the Online Tracking Information System (OTIS), data from the Profile of the Agricultural Chemical, Pesticide, and Fertilizer Industry Sector Notebook published by EPA's Office of

Compliance, and the Technical Support Document for Phosphoric Acid Manufacturing and Phosphate Fertilizers Production, queries conducted on the Missouri State Government/Business Entity Database; consultations with the Florida State Government/Office of the Environment and a number of fertilizer companies.

We used the most recent data available on the AIRS Facility Subsystem (AFS) database for the NSPS program associated with the United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards. We also used the most recent data on wages from the United States Department of Labor, Bureau of Labor Statistics, March 2001, ATable 10. Private industry, by occupational and industry group, @ and the guidance provided by the Agency's Office of Information and the Office of Management and Budget to calculate the respondent burden. Accordingly, the wage rate obtained from the table has been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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 four years.

In addition, Section 114(a) states that the Administrator may require any owner or 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 where 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 emissions from the ammonium sulfate manufacturing industry cause or contributed to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, NSPS were promulgated for this source category at 40 CFR part 60, subparts T, U, V, W, and X.

2(b) Practical Utility/Users of the Data

Source data and information requirements for phosphate fertilizer plants are outlined in Section 4(b)(i). These standards require the initial reports in accordance with the general provisions of 40 CFR section 60.7. These initial reports include notification of construction or modification, reconstruction, and startup, shutdown, or malfunction. The standards also require recordkeeping to document information relating to the daily feed rate and storage of equivalent P_2O_5 . Semiannual compliance reporting is also required by the general provisions.

Amounts of P_2O_5 are determined from Continuous Monitoring System (CMS) records of phosphate-bearing feed material or accounts for triple superphosphate stored. The standards are defined in terms of grams of fluorides emitted per metric ton of equivalent P_2O_5 processed.

The standards limits total fluoride emission to 100 grams per megagram (Mg) of equivalent P_2O_5 feed as measured in Mg/hour. Therefore, the regulations require the hourly recording of data and the maintenance of daily records for purposes of determining the feed rate used in the standard. Such records must be retained at the facility for a minimum of two (2) years.

The information generated by the monitoring, recordkeeping, and reporting requirements described above is used by the Agency to ensure that facilities affected by the NSPS continue to operate and control equipment used to achieve compliance with the NSPS. Notification of construction and startup indicates to enforcement personnel when a new affected facility has been constructed and, therefore, is subject to the standards. Under the standard, data collected by an affected facility is retained at the source for a minimum of two years and made available for inspection by the Administrator.

If the information required by the standards were not collected, the Agency would have no means of ensuring that compliance with the NSPS is achieved and maintained by new, modified, or reconstructed sources subject to the regulations. Under these circumstances, an owner or operator could elect to reduce operating expenses by not installing, maintaining, or otherwise operating the control technology required by the standards. In the absence of the information collection requirements, compliance with the standards could be ensured only through continuous on-site inspections by regulatory Agency personnel. Consequently, not collecting the information would result in either greatly increased expenditures of resources, or the inability to ensure compliance with the standards. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with the applicable regulations, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also

used for targeting inspections, and is of sufficient quality to be used as evidence in court.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 60, subparts T, U, V W, and X.

3(a) Nonduplication

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 their 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

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (71 FR 35652) on June, 21, 2006. No comments were received on the burden published in the Federal Register.

3(c) Consultations

For this information collection, we conducted a number of queries. We first reviewed the information available from the Office of Compliance Sector Notebook “Profile of the Agricultural Chemical, Pesticide, and Fertilizer Industry.” Then we accessed the most recent data available on the AIRS Facility Subsystem (AFS) database of the Aerometric Information Retrieval System as maintained by Office of Air Quality Planning and Standards (OAQPS). We also reviewed information from the “Technical Support Document for Phosphoric Acid Manufacturing and Phosphate Fertilizers Production,” published by the Office of Air Quality Planning and Standards, and gathered information from Florida State Government/Office of the Environment, Missouri State Government/Business Entity Database and a number of fertilizer companies listed in our queries.

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 likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR 1320.5.

3(f) Confidentiality

The required information has been determined not to be confidential. However, 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

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are phosphate fertilizer facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standard is 2874, and the North American Industry Classification System (NAICS) code is 325312.

4(b) Information Requested

(i) Data Items

All data in this ICR that is recorded and/or reported is required by NSPS for the Phosphate Fertilizer Industry (40 CFR part 60, subparts T, U, V, W, and X).

A source must make the following reports:

Reports for 40 CFR part 60, subparts T, U, V, W, and X	
Notification of construction/reconstruction.	60.7(a)(1)
Notification of initial startup including compliance method.	60.7(a)(3)
Initial performance test results.	60.8(a)
Initial performance test.	60.8(d)
Demonstration of continuous monitoring system.	60.7(a)(5)
Physical or operational change.	60.7(a)(4)
Semiannual or as indicated by the Administrator reports of exceedances or monitoring systems performance.	60.7(c)

Reports for 40 CFR part 60, subparts T, U, V, W, and X	
Site-specific methodology plan for demonstrating compliance with standards for fluorides.	60.242(a), 60.243(d)

A source must maintain the following records:

Recordkeeping for 40 CFR part 60, subparts T, U, V, W, and X	
Startups, shutdowns or malfunctions, periods where the continuous monitoring system is inoperative.	60.7(b)
A file with records of all data measured during performance tests to demonstrate compliance with the standard including the equipment operating parameters and records of periods of operations during which the parameters were established. The file shall be retained for two years following the date of such measurements, maintenance, reports, and records.	60.7(f)
Daily record of equivalent P_2O_5 feed rate.	60.203(b), 60.213(b) 60.223(b), 60.233
Daily record of equivalent P_2O_5 feed rate and storage.	60.243(b)
Other records specified in an EPA approved site-specific plan.	60.243(d)

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate monitoring devices that continuously measures the total pressure drop across the process scrubbing system.
Install, calibrate, maintain, and operate a flow monitoring device which can be used to determine the mass flow of phosphorus bearing feed material to the process.
As part of the performance test, determine the phosphorus pentoxide content in megagrams per hour (R_p) of the feed, using the Association of Official Analytical Chemists (AOAC) Method 9 and Method 13A or 13b to determine the total fluoride concentration of volumetric flow rate of the effluent gas from each of the emission points.
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.

Respondent Activities
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parametric data in an automated way (e.g., pressure drop and volumetric flow rate). Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronic reporting systems are still not widely used by the regulatory agencies.

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

5(a) Agency Activities

EPA conducts no activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, and quarterly reports of excess emissions reports or semiannual reports of no excess emission, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the AIRS (Aerometric Information Retrieval System) Facility Subsystem (AFS) database.

5(b) Collection Methodology and Management

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 EPA regional office. Notifications are used to inform the Agency or delegated authority when a source becomes subject to the standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports of exceedances are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into AIRS Facility Subsystem (AFS) which is operated and maintained by EPA's Office of Compliance. AFS is the EPA database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for over 100,000 industrial and government-owned facilities. EPA uses AFS for tracking air pollution compliance and enforcement activity 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 or operator for two years.

5(c) Small Entity Flexibility

Currently the number of employees at a typical fertilizer plant exceeds the criterion for small business, and no new facilities are expected within the next three years. 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 requirements the minimum needed to ensure compliance and, therefore cannot reduce them further for small entities.

The specific frequency for each information collection activity within this request is shown in Table 2: Annual Industry Burden - NSPS for the Phosphate Fertilizer Industry (40 CFR part 60, subparts T, U, V, W and X).

6. Estimating the Burden and Cost of the Collection

Table 2 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subparts 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 1,194 hours (Total Labor Hours from Table 2). 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 a Technical Labor Rate of \$57.12 per hour. This rate is from the United States Department of Labor, Bureau of Labor Statistics, March 2001, "Table 10. Private industry, by occupational and industry group." The rates are from column 1, "Total compensation." The wage 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 activity in the regulations is labor and continuous emission monitoring (CEM). There are no capital/startup costs since we have assumed that no new sources will become subject to this rule over the three-year period of this ICR. 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 and other costs such as photocopying and postage which are itemized in the following table.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Startup Cost for One Source	(C) Number of New Sources to Startup	(D) Total Startup (B X C)	(E) Annual O&M Costs for One Source	(F) Number of Existing Sources with O&M	(G) Total O&M (E X F)
Pressure drop monitor	\$27,720	0	\$ 0	\$24,630	13	\$320,190

As indicated above, there are no capital/startup costs for this ICR. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR is \$320,190. This is the total of column G.

The total respondent non-labor costs in block 14 have been calculated as the addition of the capital/startup costs, and the annual operation and maintenance costs. 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 \$320,000 (rounded).

The increase in burden from the most recently approved ICR is an adjustment. We have determined that the increase in burden is primarily due to the annual operation and maintenance costs (O&M) which are ongoing expenses that covers the maintenance of the monitors and other recordkeeping costs. The information for the costs could be found in the AIEPA Air Pollution Control Cost Manual@ dated October 2000. The cost data can be found on pages 4-19, Table 4.6: Cost Summary for Pressure Drop across Wet Scrubber.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. Publication and distribution of the information are part of the AFS program. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of EPA's overall compliance and enforcement program.

The average annual Agency cost during the three years of the ICR is estimated to be \$996 (see Table 1: Average Annual EPA Burden - NSPS for the Phosphate Fertilizer Industry (40 CFR part 60, subpart T, U, V, W, and X). This cost is based on the average hourly labor rate at a GS-12, Step 1, times a 1.6 benefits multiplication factor to account for government overhead expenses for a total of \$38.30. This rate is from the Office of Personnel Management (OPM) "2002 General Schedule" which excludes locality rates of pay.

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

Respondent Universe and Number of Responses Per Year						
Regulation Citation	(A) Average Number of New Respondents per Year	(B) Number of Reports for New Sources	(C) Number of Existing Respondents	(D) Number of Reports for Existing Sources	(F) Number of Respondents that keep records but do not submit reports	(E) Total Annual Responses (AxB)+(CxD)+F
40 CFR Part 60, Subparts T, U, V, W, and X	0	6	13	2	0	26

The number of total respondents is 13. This number is the sum of column A and column C of the Respondent Universe and Number of Responses Per Year table. This represents the number of existing sources plus the number of new sources averaged over the three-year period.

The number of Total Annual Responses is 26. This is the number in column E of the Respondent Universe and Number of Responses Per Year table.

The total annual labor costs are \$68,173. Details upon which this estimate is based appear in Table 2: Annual Respondents Burden - NSPS for the Phosphate Fertilizer Industry, (40 CFR part 60, subparts T, U, V, W, and X).

The total annual capital and O&M costs to the regulated entity are \$320,000 (rounded). These costs are detailed in Section 6(b)(iii), Capital/Startup vs. Operating and Maintenance (O&M) Costs.

6(e) Bottom Line Burden Hours and Cost Tables

The bottom line burden hours and cost tables for both the Agency and the respondents are attached.

6(f) Reasons for Change in Burden

There is no change in hours in the total estimated burden currently identified in the OMB Inventory of Approved ICR Burdens. We have assumed that the number of sources subject to the rules addressed by this ICR is 13, with no new additional sources over the three years period of this ICR.

There was no change in the capital/startup and operations and maintenance (O&M) costs from the previous ICR, since there were no new sources expected over the three years of this ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 46 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 currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

An 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. The OMB control numbers for EPA's regulations are listed in 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-2006-0439. 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), EPA West, Room B102, 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-2006-0439 and OMB Control Number 2060-0037 in any correspondence.

Note: The EPA Docket Center suffered damage due to flooding during the last week of June 2006. The Docket Center is continuing to operate. However, during the cleanup, there will be temporary changes to Docket Center telephone numbers, addresses, and hours of operation by people who wish to visit the Public Reading Room to view documents. Consult EPA's Federal Register notice at 71 FR 38147 (July 15, 2006) or the EPA website www.epa.gov/epahome/dockets.htm for current information on docket status; locations and telephone numbers.

Part B of the Supporting Statement

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

TABLE 1: AVERAGE ANNUAL EPA BURDEN - NSPS for the PHOSPHATE FERTILIZER INDUSTRY (40 CFR PART 60, SUBPARTS T, U, V, W, and X)

plant/year Burden Items	(A) EPA hrs/ Occurrences	(B) Occurrence year	(C) EPA hr hrs/year (A x B)	(D) Plants/	(E) EPA (C x D)
1. Required Activities					
New Plant ^a					
Initial performance tests ^b	24	1	24	0	0
Repeat performance tests ^c	24	0.2	4.8	0	0
2. Report Review					
New Plant					
Notification of construction	2				
2 0 0					
Notification of initial startup	0.5	1	0.5	0	0
Notification of actual startup	0.5	1	0.5	0	
0					
Notification of initial test	0.5	1.2	0.6	0	
0					
Review test results	8	1.2	9.6	0	
0					
Notification of demonstration of CMS		0.5		0.5	0
Existing Plants					
Semiannual report of exceedances	1	2	2	13	26
TOTAL ANNUAL HOUR				13	26

Salary ^d
 (1 person x 26 hrs/year x \$38.30/hrs) = \$ 996. (rounded)

TOTAL ANNUAL BURDEN = \$996. (rounded)

Assumptions:

- a. Assume that there will be no new sources (respondents) over the 3 years period of this information collection request (ICR).
b. Assume EPA personnel attend all initial performance tests.
c. Assume 20 percent of initial performance tests are repeated due to failure.
d. The cost is based on the average hourly labor rate at a GS-12, Step 1, times a 1.6 benefits multiplication factor to account for government overhead expenses for a total of \$38.30.

TABLE 2: ANNUAL INDUSTRY BURDEN - NSPS for the PHOSPHATE FERTILIZER INDUSTRY (40 CFR PART 60, SUBPARTS (T, U, V, W, AND X))

Burden Items	(A) Hours per Occurrence	(B) Occurrences Respondent/ Year	(C) Hours Respondent/ Year (A x B)	(D) Respondents/ per Year	(E) Hours per Year (C x D)	(F) Cost, \$ Year ^a
1. RECORDKEEPING REQUIREMENTS	N/A					
2. SURVEY AND STUDIES	N/A					
3. REPORTING REQUIREMENTS						
New Sources ^b						
A. <u>Read Instructions</u>	1	1	1	0	0	0
B. <u>Required Activities</u>						
New Sources ^b						
Initial performance test						
AOCA Method 9 tests ^c	29.7	1	29.7	0	0	0
Reference Method 13A or 13B tests ^d	4	1	4	0	0	0
Repeat performance test ^e	4	0.2	0.8	0	0	0
C. Create Information	Included in 3B					
A. Gather Existing Information	Included in 3E					
B. <u>Write Report</u>						
New Sources						
Notification of construction/reconstruction	2	1	2	0	0	0
Notification of actual startup	2	1	2	0	0	0
Notification of initial performance test		2	1	2	0	0

Notification of CMS demonstration	2	1	2	0	0	0
Report of initial performance test	Included in 3B					
Site-Specific methodology plan ^f	2	1	2	0	0	0
Existing Sources						
Notification of operational change ^g	2	1	2	2	4	228.48
Semiannual report of exceedances ^h	2	2	4	13	52	2,970.24
SUBTOTAL					56	3,198.72
4. RECORDKEEPING REQUIREMENTS						
A. <u>Read Instructions</u>	Included in 3A					
A. <u>Plan Activities</u>	Included in 3B					
C. <u>Implement Activities</u>	Included in 3B					
B. <u>Develop Record System</u>	N/A					
A. <u>Time to Enter Information</u>						
Records of operating parameters and emissions ⁱ	0.25	350	87.5	13	1,137.5	\$64,974.00
TOTAL ANNUAL BURDEN					1,194	\$68,173

F.

Assumptions:

- a. Assume a technical labor rate of \$57.12 from the United States Department of Commerce Bureau of Labor Statistics, March 2001, Table 2: Employment Costs of Civilian Workers by Occupational and Industry Group. The rates are from column 1: Total compensation. The wage rate obtained from the table has been increased by 110% to account for the benefit packages available to those employed by private industry.
- b. Assume that there will be no new sources (respondents) over the 3 years period of this ICR.
- c. As specified in the general provisions each performance test shall consist of three separate runs using the applicable test method. Sources are required to use the spectrophotometric molybdovanadophosphate method (AOAC) Method 9 published in the 11 Edition of the Official Methods of Analysis of the Association of Official Analytical Chemists dated 1970, to determine the P₂O₅ feed rate.
- d. As specified in the general provisions, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specific in the applicable rule. For these rules, the total fluoride concentration and volumetric flow rate of the effluent gas shall be determined by Method 13 which requires a sampling time and a sample volume for each run of at least 60 minutes and 0.85 dscm (30 dscf).
- e. Assume 20 percent of initial performance tests must be repeated due to failure.
- f. Only sources that have a granular triple superphosphate storage facility are required to submit this initial plan.
- g. Assume that 15% of the source would be attributed to operational changes.
- h. Assume each source will submit a semiannual report due to excess emission and monitoring systems performance over the three year period.
- i. Sources are required to maintain a daily record of operating parameters (e.g., determine equivalent P₂O₅ content, and total pressure drop across the

scrubbing system).

Assume operation 350 days per year as specified in the NSPS review document.