

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Phosphate Rock Plants

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Phosphate Rock Plants (40 CFR part 60, subpart NN (Renewal))

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS), for the regulations published at 40 CFR 60, Subpart NN, were proposed on September 21, 1979, and promulgated on April 16, 1982. These regulations apply to the following new facilities at phosphate rock plants with capacities greater than 4 tons per hour: dryers, calciners, grinders, and ground rock handling and storage facilities, except those facilities producing or preparing phosphate rock solely for consumption in elemental phosphorus production. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 60, subpart NN.

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.

Based on our consultations with industry representatives, there is an average of one affected facility 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, an average of thirteen facilities per year will be subject to the standard, and it is estimated that one additional source will become subject to the standard in the next three years.

There are approximately thirteen phosphate rock plants in the United States, which are all publicly owned and operated by the phosphate rock industry. None of the thirteen plants in the United States are owned by either state, local, tribal or the Federal Government. They are all owned and operated solely by privately owned for-profit businesses. You can find the burden to

the “Affected Public” listed below in Table 1: Annual Industry Burden and Cost - NSPS for Phosphate Rock Plants (40 CFR part 60, subpart NN). The Federal government burden does not include work performed by Federal employees only work performed by contractors, which could be found listed below in Table 2: Average Annual EPA Burden - NSPS for Phosphate Rock Plants (40 CFR part 60, subpart NN).

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

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

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

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

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every 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 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) emissions from phosphate rock plants cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS was promulgated for this source category at 40 CFR part 60, subpart NN.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard 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 standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance tests, 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 the standard 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 ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standard is being met. The performance test may also be observed.

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

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 60, subpart NN.

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 (72 FR 10735) on March 9, 2007. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The

primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 13 respondents will be subject to the standard over the three year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

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.

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.

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

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 source category

description. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 1475, which corresponds to the North American Industry Classification System (NAICS) 212392 for source category description. The respondents to the recordkeeping and reporting requirements are electric utility steam generating units.

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

In this ICR, all the data recorded or reported is required by the New Source Performance Standards for Phosphate Rock Plants (40 CFR part 60, subpart NN).

A source must make the following reports:

Notifications	
Notification of construction or reconstruction	60.7(a)(1)
Notification of actual startup	60.7(a)(3)
Notification of physical or operational change which may increase the emission rate	60.7(a)(4)
Notification of demonstration of continuous monitoring system	60.7(a)(5)
Notification of initial performance test	60.8(d)
Report on initial performance test	60.8(a)
Semiannual report on excess emissions	60.7(c)

A source must keep the following records:

Recordkeeping	
Maintain records of startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	60.7(b)
Maintain all records for two years	60.7(f)

Electronic Reporting

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

Also, regulatory agencies in cooperation with the respondents continue to create reporting

systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate continuous monitoring system (CMS) for opacity, or for pressure drop and liquid supply pressure for wet scrubber.
Perform initial performance test, Reference Methods 5, and 9, and repeat performance tests if necessary.
Write the notification and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install and utilize technology and systems for the purpose of disclosing and providing information.
Adjust 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.

Currently, sources are using monitoring equipment that provides parameter data in an automated way e.g., continuous parameter monitoring system. 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.

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

5(a) Agency Activities

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

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

5(b) Collection Methodology and Management

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

Information contained in the reports is entered into OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is an EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS 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 or operator for two 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

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Industry Burden, NSPS for Phosphate Rock Plants (40 CFR part 60, subpart NN).

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. Wherever 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 1,602 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$95.32	(\$45.39 + 110%)
Technical	\$64.60	(\$30.76 + 110%)
Clerical	\$40.09	(\$19.09 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2003, ATable 2. Civilian Workers, by occupational and industry group.© The rates are from column 1, ATotal compensation.© The rates have been increased by 110% 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. The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor 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)
Continuous Opacity Monitor	\$37,000	0.33	\$12,210	\$8,4000	13.33	\$111,972

The total capital/startup costs for this ICR are \$12,210. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$111,972. 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 \$124,182.

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 \$5,523.

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

Managerial	\$54.66 (GS-13, Step 5, \$34.16 + 1.6)
Technical	\$40.56 (GS-12, Step 1, \$25.35 + 1.6)
Clerical	\$21.95 (GS-6, Step 3, \$13.72 + 1.6)

These rates are from the Office of Personnel Management (OPM) 2004 General Schedule which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden, NSPS for Phosphate Rock Plants (40 CFR part 60, subpart NN), below.

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 13 existing respondents will be subject to the standard. It is estimated that one additional respondent will become subject to the standard over the next three years.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR.

Number of Respondents					
Year	(A) Number of New Respondents	(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	0.33	13	0	0	13.33
2	0.33	13	0	0	13.33
3	0.33	13	0	0	13.33
Average	0.33	13	0	0	13.33

¹ New respondent include sources with constructed, reconstructed and modified affected facilities. In this standard existing respondents submit initial notifications.

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 13.33 or 13 when rounded.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC) +D
Notification of construction or modification	0.33	1	n/a	0.33
Notification of actual startup	0.33	1	n/a	0.33
Notification of physical or operational change which may increase the emission rate	0.33	1	n/a	0.33
Notification of demonstration of CMS	0.33	1	n/a	0.33
Notification of initial performance tests	0.33	1	n/a	0.33
Report of initial performance test	0.33	1	n/a	0.33
Semiannual report on excess emissions	13.33	2	n/a	26.66
			Total (rounded)	29

The number of total respondents is 13.

The number of Total Annual Responses is 29. This is the number in column E of the Respondent Universe and Number of Responses per year in table above.

The total annual labor costs are \$102,245. Details regarding these estimates may be found in Table 1: Annual Industry Burden, NSPS for Phosphate Rock Plants (40 CFR part 60, subpart NN), below.

6(e) Bottom Line Burden Hours 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, respectively, and summarized below.

(i) Respondent Tally

The total annual labor costs are \$102,245. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NSPS for Phosphate Rock Plants (40 CFR Part 60, Subpart NN), below. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 55.2 hours per response.

The total annual capital/startup and O&M cost to the regulated entity are \$124,182.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 140 labor hours at a cost of \$5,523. See Table 2. Annual Agency Burden and Cost: NSPS for Phosphate Rock Plants (40 CFR part 60, subpart NN), below.

6(f) Reasons for Change in Burden

There is no change in the labor hours in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change to the overall labor hours.

There is however, a change in the cost estimate. The previous ICR used a total cost figure of \$124,000 for Capital Startup (CSU) costs and Operating and Maintenance (O&M) costs. . This ICR uses the exact cost figure \$124,182 resulting in a small cost increase.

Since there are no changes in the regulatory requirements and there is no significant industry growth, the labor hours in the previous ICR are used in this ICR and there is no change in the labor hours to industry.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 55.2 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's 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-2007-0045. 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 content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search" than 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 3334, 1301 Constitution Avenue, N.W., 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 Enforcement and Compliance Docket and Information Center Docket 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, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2007-0045 and OMB Control Number 2060-0111 in any correspondence.

Part B of the Supporting Statement

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

Record operating parameters ^g	0.25	350	87.5	13.3	1,163.75	58.19	116.38	\$85,390.16
F. Time to transmit or disclose Information	N/A							
D. Train personnel	N/A							
E. Audits	N/A							
Subtotal					1,393.46	69.66	139.37	\$102,245.14
TOTAL ANNUAL BURDEN AND COST (rounded)					1,602			\$102,245

Assumptions:

- ^{a.} We have assumed that the average number of respondents that will be subject to the rule will be 13.33. It is estimated that one new source will become subject to the rule over the three-year period of this ICR.
- ^{b.} This ICR uses the following labor rates: \$95.32 per hour for Executive, Administrative, and Managerial labor; \$64.60 per hour for Technical labor, and \$40.09 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2003, "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 20 percent of initial performance test will be repeated due to failure.
- ^{d.} We have assumed that no facility will be engaged in physical or operational changes.
- ^{e.} We have assumed that it will take each respondent 2 hours each to write CMS notification report.
- ^{f.} We have assumed that each respondent will take 8 hours two times per year to write semiannual report on excess emissions.
- ^{g.} We have assumed that each respondent will take 15 minutes per day to record operating parameters information.

Table 2: Average Annual EPA Burden – NSPS for Phosphate Rock Plants (40 CFR part 60, subpart NN)

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Activity	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year (a)	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost {\$} (b)
Initial performance tests								
New or modified facility	24	1	24	0.33	7.92	0.40	0.79	\$360.26
Repeat performance test								
New or modified facility ^c	24	1	24	0.07	1.58	0.16	1.82	\$72.05
Report Review								
New or modified facility								
Notification of construction/reconstruction	2	1	2	0.33	0.66	0.03	0.07	\$30.02
Notification of actual startup	2	1	2	0.33	0.66	0.03	0.07	\$30.02
Notification of a physical or operational change which may increase the emission rate ^d	2	1	2	0	0	0	0	\$0
Notification of demonstration of CMS ^e	2	1	2	0.33	0.66	0.03	0.07	\$30.02
Notification of initial performance test	2	1	2	0.33	0.66	0.03	0.07	\$30.02
Report on initial performance test	8	1	8	0.33	2.64	0.13	0.26	\$120.09
^f Semiannual report on excess emissions	4	2	8	13.33	106.64	5.33	10.66	\$4,850.84
Subtotal					121.42	6.14	13.81	\$5,523.32
TOTAL ANNUAL BURDEN AND COST (rounded)						140		\$5,523

Assumptions:

^a. We have assumed that the average number of respondents that will be subject to the rule will be 13.33. It is estimated that one new source will become subject to the rule over the three-year period of this ICR

^b. The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses. Managerial rates of \$54.66 (GS-13, Step 5, \$34.16x1.6), Technical rate of \$40.56 (GS-12, Step 1, \$25.35 x 1.6), and Clerical rate of \$21.95 (GS-6, Step 3, \$13.72 x 1.6). These rates are from the Office of Personnel Management (OPM) "2004 General Schedule" which excludes locality rates of pay.

^c. We have assumed that 20 percent of initial performance test will be repeated due to failure.

^d. We have assumed that no facility will be engaged in physical or operational changes.

^e. We have assumed that it will take each respondent 2 hours each to review CMS notification report.

f. We have assumed that each respondent will take 8 hours two times per year to review semiannual report on excess emissions.