

## SUPPORTING STATEMENT

### NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR AREA SOURCES: PREPARED FEEDS MANUFACTURING

#### PART A

##### 1.0 Identification of the Information Collection

(a) *Title and Number of the Information Collection.*

“National Emission Standards for Hazardous Air Pollutants for Area Sources: Prepared Feeds Manufacturing.” This is a new information collection request (ICR), and the EPA tracking number is 2354.02.

(b) *Short Characterization.*

This ICR covers information collection requirements in the final area source rule for Prepared Feeds Manufacturing (40 CFR part 63, subpart DDDDDDD). The information collected will be used by EPA and delegated state and local agencies to determine the compliance status of sources subject to the rule.

The potential respondents are owners or operators of any existing or new area source prepared feed manufacturing facility that adds chromium compounds or manganese compounds to their products. A prepared feed manufacturing facility is a facility that produces feed for animals (other than dogs and cats). We believe there are approximately 1,800 facilities currently operating that would be subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) for the Prepared Feeds Manufacturing Area Source Category. The affected source category is prepared feeds manufacturers (except for cat and dog food) who add chromium compounds or manganese compounds to their product. The final standards include both management practices and equipment requirements. The final management practices include general requirements to perform housekeeping measures to minimize excess dust and to maintain and operate all process equipment in a manner to minimize dust creation. The final regulation would require that all facilities with daily production rates greater than 50 tons per day install, operate, and maintain a capture system that collects the emissions from the pelleting operations and conveys the collected emissions to a cyclone. This cyclone must be designed to achieve at

least 95 percent efficiency in the removal of PM. Existing area source prepared feed manufacturers currently control particulate emissions as a result of permitting requirements, and/or management practices already used by the industry to reduce particulate matter. These controls and management practices also result in the reduction of chromium and manganese emissions. We estimate that the impacts associated with the compliance requirements of the final rule (monitoring, reporting, and recordkeeping) will average approximately \$980 per facility. The information collection requirements for existing and new sources in the Prepared Feeds Manufacturing Area Source Category are listed in Attachment 1.

## **2. Need For and Use of the Collection**

### *(a) Need/Authority for the Collection.*

Section 112 of the Clean Air Act (CAA) requires EPA to establish NESHAP for both major and area sources of HAP that are listed for regulation under CAA section 112(c). An area source is a stationary source that is not a major source (i.e., an area source does not emit and does not have the potential to emit more than 10 tons per year [tpy] of any single HAP and more than 25 tpy of any combination of HAP). Requirements for area sources in CAA sections 112(c) (3) and 112(k) direct EPA to (1) identify at least 30 air toxics that present the greatest potential health threat in the largest number of urban areas and (2) to identify sufficient area source categories to ensure that sources representing 90 percent or more of the emissions of the 30 “listed” HAP are subject to regulation. EPA implements these requirements through the Integrated Urban Air Toxics Strategy (64 FR 38715, July 19, 1999). We added the source category to the Integrated Urban Air Toxics Strategy Area Source Category list on November 22, 2002 (67 FR 70427). Regulation of prepared feeds manufacturing is necessary for EPA to meet the 90 percent requirement for chromium compounds and manganese compounds. Both of these HAP metals are on the list of 30 HAP identified in the 1999 strategy.

Under CAA section 112(d)(5), EPA may elect to promulgate HAP standards for area sources based on the use of generally available control technology or management practices (i.e., “GACT”) used by the sources. EPA can consider costs and economic impacts in determining GACT, which is particularly important when developing regulations for source categories that may have few establishments and many small businesses, or when determining whether

additional control is needed for sources that are already well-controlled as a result of other air emissions standards.

Certain records and reports are necessary for the Administrator to confirm the compliance status of area sources, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the Clean Air Act (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions. The recordkeeping and reporting requirements for title V permits are contained in 40 CFR 70.6 and 40 CFR 71.6. Under parts 63 and 70 or 71, the owner or operator must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

*(b) Use/Users of the Data.*

The information will be used by the delegated authority (state agency, or Regional Administrator if there is no delegated state agency) to ensure that the standards and other requirements are being achieved. Based on review of the recorded information at the site and the reported information, the delegated permitting authority can identify facilities that may not be in compliance and decide which facilities, records, or processes may need inspection.

**3. Nonduplication, Consultations, and Other Collection Criteria**

*(a) Nonduplication.*

A computer search of EPA’s ongoing ICRs revealed no duplication of information-gathering efforts

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

This section is not applicable because this is a rule-related ICR.

*(c) Consultations.*

The final rule was developed in consultation with individual companies and trade organizations. The key non-EPA persons consulted on the information collection activities are identified in Table 1.

TABLE 1. PERSONS CONSULTED ON THE INFORMATION COLLECTION ACTIVITIES

Contact	Organization	Email address/Phone Number
Lauren Barker	ADM Alliance Nutrition	<a href="mailto:Lauren_Barker@admworld.com">Lauren_Barker@admworld.com</a>

Contact	Organization	Email address/Phone Number
John Jones	Cargill Animal Nutrition	<a href="mailto:john_d_jones@cargill.com">john_d_jones@cargill.com</a>
Keith Epperson	American Feed Industry Assoc. (AFIA)	703-558-3568
Rebecca Ranck	Wegner Feeds	717-361-4269
Gary Brown	Flint River Mills, Inc.	<a href="mailto:brownge@f-r-m.com">brownge@f-r-m.com</a>
Mark Willhite	DeKalb Feeds Inc.	<a href="mailto:markwillhite@dekalbfeeds.com">markwillhite@dekalbfeeds.com</a>
Mike Murphy	DeKalb Feeds Inc.	<a href="mailto:mikemurphy@dekalbfeeds.com">mikemurphy@dekalbfeeds.com</a>
James D. Seley	Feed Commodities, L.L.C.	<a href="mailto:jseley@feedcomm.com">jseley@feedcomm.com</a>
Gary Zurinski	Quality Liquid Feeds	<a href="mailto:gary@qlf.com">gary@qlf.com</a>
David Parker	Koch Foods	<a href="mailto:davpar@kochfoods.com">davpar@kochfoods.com</a>
Ron Krebs	Airlance	<a href="mailto:rkrebs@airlance.com">rkrebs@airlance.com</a>
Bob Orr	Bateman	<a href="mailto:Bob.orr@bateman-bet.com">Bob.orr@bateman-bet.com</a>
Don Lear	Kice Industries	<a href="mailto:dlear@kice.com">dlear@kice.com</a>
Bruce Dokurno	Differential Pressure Plus	203-481-2545
	Omega Engineering Inc.	<a href="http://www.Omega.com">www.Omega.com</a>
	Dwyer Instruments	<a href="http://www.dwyer-inst.com">www.dwyer-inst.com</a>

(d) *Effects of Less Frequent Collection.*

If the relevant information were collected less frequently, the delegated permitting authority (State or EPA) will not be reasonably assured that a facility is in compliance with the standards.

(e) *General Guidelines.*

None of the guidelines in 5 CFR 1320.6 are being exceeded.

(f) *Confidentiality.*

All 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 (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

(g) *Sensitive Questions.*

This section is not applicable because this ICR does not involve matters of a sensitive nature.

#### **4. The Respondents and the Information Requested**

##### *(a) Respondents/NAICS Codes.*

Potential respondents under Subpart DDDDDDD are owners or operators of any existing or new area source prepared feed manufacturing facility that adds chromium or manganese to their products. The North American Industry Classification System (NAICS) code for Prepared Feeds Manufacturing is 311119. We estimate that approximately 1,800 area source facilities will be subject to the NESHAP; no new area sources are projected during the 3 year period of this ICR.

##### *(b) Information Requested.*

*(i) Data Items, Including Recordkeeping Requirements.* Attachment 1, Information Requirements, summarizes the data items, including recordkeeping and reporting requirements, for the Prepared Feeds Manufacturing Area Source NESHAP.

Sources would be required to use 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 and we estimate that only a small percentage currently use electronic reporting systems.

*(ii) Respondent Activities.* The respondent activities that will be required by the final Prepared Feeds Manufacturing Area Source NESHAP are identified in Table 2 (located at the end of this supporting statement) and are introduced in section 6(a).

#### **5. The Information Collected—Agency Activities, Collection Methodology, and Information Management**

##### *(a) Agency Activities.*

The Agency activities associated with the final Prepared Feeds Manufacturing Area Source NESHAP are provided in Table 3 (located at the end of this supporting statement) and are introduced in section 6(c).

*(b) Collection Methodology and Management.*

Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs of the delegated permitting authority. The notifications of compliance status and annual compliance certifications required under the final rule are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. EPA is the permitting authority until the state agency is delegated authority to implement the final rule. Therefore, information contained in the reports submitted to the Regional Administrator will be entered into the Air Facility System (AFS), which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS 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.

*(c) Small Entity Flexibility.*

The Small Business Administration defines a small entity as one that meets the Small Business Administration size standards for small businesses found at 13 CFR 121.201 as one having less than 500 employees for NAICS 311119. We estimate that a significant portion of the facilities are small entities. However, our analysis indicates that the final rule would not impose a significant adverse impact on any facilities, large or small, since these costs are less than 0.1 percent of revenues.

*(d) Collection Schedule.*

The specific frequency for each information collection activity within this request is shown in Table 3 for Prepared Feeds Manufacturing Area Source Category.

## **6. Estimating the Burden and Cost of the Collection**

*(a) Estimating Respondent Burden.*

The annual burden estimates for the final Prepared Feeds Manufacturing Area Source NESHAP are shown in Table 2. These numbers were derived from estimates based on EPA's experience with other standards. No burden estimates are provided for new area sources because no new facilities are expected to become affected sources during the 3year period of this ICR.

(b) *Estimating Respondent Costs.*

The information collection activities for the final Prepared Feeds Manufacturing Area Source NESHAP are presented in Table 2. Because the data are already collected by respondents as part of normal operations, no respondent development costs are associated with the information collection activities.

(i) *Estimating Labor Costs.* We used May 2007 labor rates from the Bureau of Labor Statistics for Animal Food Manufacturing (NAICS 311100).<sup>1</sup> Wages for occupational groups are used as the basis for the labor rates with hourly rates of \$32.10/hour for technical, \$35.64/hour for managerial, and \$14.65/hour for clerical. To these rates we added fringe benefits calculated at 29 percent of hourly earnings and an overhead rate of 110 percent. The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$82.65, management at \$96.55, and clerical at \$38.94. Loading factors (i.e., fringe benefits and overhead rates) were calculated using methodologies referenced in promulgated regulations and their accompanying Information Collection Requests (ICRs), particularly those used in New Source Review (NSR) regulations.

(ii) *Estimating Capital and Operations and Maintenance (O&M) Costs.* The final Prepared Feeds Manufacturing Area Source NESHAP would require that every existing and new facility with a daily production level greater than 50 tons per day install and operate a cyclone to reduce emissions from pelleting operations. These facilities are required to install a device on the cyclone to monitor inlet flow rate, inlet velocity, pressure drop, or amperage. We estimate that none of the 1,284 facilities with daily production levels greater than 50 tons per day already have the required monitoring equipment. Therefore, all would be required to purchase and operate monitoring equipment. We estimate that a monitoring device could be purchased for \$295 (based on the average of the costs obtained from Dwyer, Differential Pressure Plus, and Omega). We assumed an annual operation and maintenance of 10 percent of the initial capital cost, or \$29 per year. Therefore, the annual operation and maintenance costs would be \$37,236 per year for the 1,284 facilities. These costs would only be incurred in the 3<sup>rd</sup> year of the period.

---

<sup>1</sup> May 2006 National Industry-Specific Occupational Employment and Wage Estimates. Located [http://www.bls.gov/oes/current/naics4\\_331100.htm](http://www.bls.gov/oes/current/naics4_331100.htm)

(iii) *Annualizing Capital Costs.* These capital costs were annualized assuming an interest rate of 7 percent and a life of 15 years, resulting in an annualized capital cost of \$32 per year per facility. The total annualized capital cost for all 1,284 facilities would be \$41,088 per year.

(c) *Estimating Agency Burden and Cost.*

Because the information collection requirements were developed as an incidental part of standards development, no costs can be attributed to the development of the information collection requirements. Because reporting and recordkeeping requirements on the part of the respondents are required under the operating permits rules in 40 CFR part 70 or part 71 and the part 63 NESHAP General Provisions, no operational costs will be incurred by the Federal Government. Publication and distribution of the information are part of the Compliance Data System, with the result that no Federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of sources that is part of EPA's overall compliance and enforcement program, and, therefore, is not attributable to the ICR. The only costs that the Federal government will incur are user costs associated with the analysis of the reported information, as presented in Table 3.

The Agency labor rates are from the Office of Personnel Management (OPM) 2007 General Schedule which excludes locality rates of pay. These rates can be obtained from Salary Table 2007-GS available on the OPM website, [http://www.opm.gov/oca/07tables/html/gs\\_h.asp](http://www.opm.gov/oca/07tables/html/gs_h.asp). The government employee labor rates are \$14.60/hour for clerical (GS-6, Step 3), \$26.98 for technical (GS-12, Step 1), and \$36.36/hr for management (GS-13, Step 5). These rates were increased by 60 percent to include fringe benefits and overhead. The fully-burdened wage rates used to represent Agency labor costs are: clerical at \$23.36; technical at \$43.17, and management at \$58.18.

(d) *Estimating the Respondent Universe and Total Burden and Costs.*

There are an estimated 1,800 existing facilities that will be subject to the Prepared Feeds Manufacturing Area Source NESHAP. No new sources are expected during the next 3 years. Consequently, the average annual number of prepared feed facilities estimated during the 3-year period of this ICR is 1,800.



For the final Prepared Feeds Manufacturing Area Source NESHAP, the components of the total annual responses attributable to this ICR in the first three years are one-time initial notifications and one-time notifications of compliance status for the 1,800 facilities that will be subject to the rule.

The number of total annual responses for subpart DDDDDDD is estimated at 1,200. This is the number of initial notifications and notifications of compliance for each of the 1,800 facilities (3,600) divided by the three year period of the ICR.

*(e) Bottom Line Burden Hours and Cost Tables.*

*(i) Respondent tally.* The bottom line respondent burden hours and costs, presented in Table 2 are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column. The average annual burden for the recordkeeping and reporting requirements in subpart DDDDDDD for the 1,800 existing facilities that are subject to the Prepared Feeds Manufacturing Area Source NESHAP is 12 person-hours, with an annual labor average cost of around \$980, which includes annualized capital costs and O&M costs of around \$61.

*(ii) The Agency tally.* The average annual Federal Government cost is \$48 for 1 hour for subpart DDDDDDD. The bottom line Agency burden hours and costs presented in Table 3 (located at the end of this supporting statement) are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column.

*(iii) Variations in the annual bottom line.* This section does not apply since no significant variation is anticipated.

*(f) Reasons for Change in Burden.*

We are requesting an increase in burden of 387 hours due to implementation of this new regulation.

*(g) Burden Statement*

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 1 hour per response. The average annual respondent burden for the final Prepared Feeds Manufacturing Area Source NESHAP is estimated at 15 hours per year.

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 in 40 CFR part 63 are listed in 40 CFR part 9.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggestions for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2008-0080, which is available for online viewing at <http://www.regulations.gov>, or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA 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 Air Docket is (202) 566-1742. An electronic version of the public docket is available at <http://www.regulations.gov>. This site can be used to submit or view public comments, access the index listing of the contents of the public 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 Numbers identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17<sup>th</sup> Street, NW, Washington, DC 20503, Attention Desk Officer for EPA. Please include the relevant Docket ID Number (EPA-HQ-OAR-2008-0080) in any correspondence.

**PART B**

This section is not applicable because statistical methods are not used in data collection associated with the final rule.

TABLE 2A. Year 1 ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS OF THE PROPOSED STANDARD

	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost,\$ (a)
1. Applications								
2. Survey and Studies								
3. Acquisition, Installation, & Utilization of Tech. & Systems								
4. Reporting Requirements								
A. Read instructions (b)	1.00	1.0	1.0	1800.0	1800.0	90.0	180.0	\$ 164,471
B. Required activities								
i. Quarterly control equipment inspection	1.00	4	4.0	0		0	0	\$ -
ii. Daily cyclone performance measures	0.10	365	36.5	0		0	0	\$ -
C. Create information								
D. Gather existing information								
E. Write report								
Initial Notification (b)	0.50	1.0	0.5	1800.0	900.0	45.0	90.0	\$ 82,236
Notification of Compliance Status (c)	1.00	1.0	1.0	0.0	0.0	0.0	0.0	\$ -
Annual Compliance Certification (c)	1.00	1.0	1.0	0.0	0.0	0.0	0.0	\$ -
5. Recordkeeping Requirements								
A. Read instructions								
B. Plan activities								
C. Implement activities								
D. Develop record system								
E. Time to enter information								
F. Time to train personnel								
G. Time to transmit or disclose information	0.10	1.0	0.1	0.0	0.0	0.0	0.0	\$ -
I. Time for audits								
TOTAL ANNUAL BURDEN AND COST (SALARY)					2700.0	135.0	270.0	\$ 246,707
TOTAL ANNUAL NUMBER OF RESPONSES (i)								1,800
ANNUAL CAPITAL COSTS:	0.00							\$ -
ANNUALIZED CAPITAL COSTS:								
Total annualized capital	0.00							\$ -
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								\$ -

(a) Costs are based on the following hourly rates: technical at \$82.65, management at \$96.55, and clerical at \$38.94.

(b) One-time activity. There are an estimated 1,800 existing facilities and no new facilities are expected.

(c) Two years proposed to comply with rule means year three for the Notification of Compliance Status and no Annual Compliance Certifications during the period.

TABLE 2B. Year 3<sup>1</sup> ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS OF THE PROPOSED STANDARD

<sup>1</sup> There are no requirements for year 2 so the burden is zero.

	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondent s per year	(E) Technical person-hours per year (E=CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost,\$ (a)
1. Applications								
2. Survey and Studies								
3. Acquisition, Installation, & Utilization of Tech. & Sys.								
4. Reporting Requirements								
A. Read instructions (b)	1.00	1.0	1.0	0.0	0.0	0.0	0.0	\$ -
B. Required activities								
i. Monthly control equipment inspection	1.00	4	4.0	1,284	5136.0	257	514	\$469,292
ii. Daily cyclone performance measures	0.10	365	36.5	1,284	46866.0	2,343	4,687	\$4,282,288
C. Create information								
D. Gather existing information								
E. Write report								
Initial Notification (b)	1.00	1.0	1.0	0.0	0.0	0.0	0.0	\$ -
Notification of Compliance Status (c)	1.00	1.0	1.0	1800.0	1800.0	90	180	\$164,471
Annual Compliance Certification (c)	1.00	1.0	1.0	0.0	0.0	0.0	0.0	\$ -
5. Recordkeeping Requirements								
A. Read instructions	0.50	1.0	0.5	516.0	258.0	13	26	\$23,574
B. Plan activities								
C. Implement activities								
D. Develop record system								
E. Time to enter information								
F. Time to train personnel								
G. Time to transmit or disclose information (d)								
I. Time for audits	0.10	1.0	0.1	1800.0	180.0	9.0	18.0	\$16,447
TOTAL ANNUAL BURDEN AND COST (SALARY)					54240.0	2712.0	5424.0	\$4,956,073
TOTAL ANNUAL NUMBER OF RESPONSES								1,800
ANNUAL CAPITAL COSTS:								
ANNUALIZED CAPITAL COSTS: (e)								
Total annualized capital (f)	0.00							\$41, 529
Total annual O&M (f)								\$37,825
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs) <sup>(e)</sup>								\$79,354

(a) Costs are based on the following hourly rates: technical at \$82.65, management at \$96.55, and clerical at \$38.94.

(b) One-time activity completed during year one.

(c) One-time activity. Two years proposed to comply with rule means year three for the Notification of Compliance Status and no Annual Compliance Certifications during the period.

(d) Information related to requirements under 4B.

(e) monitoring device- \$295 each capital, # = 1,284 - to monitor cyclone performance.

(f) Annualized cost of monitoring device - \$32/year, # = 1,284 (7%. 15 years). O&M – 10% of capital cost/year - \$29, # - 1,284.

TABLE 3. ANNUAL BURDEN AND COST TO THE FEDERAL GOVERNMENT OF THE PROPOSED STANDARDS

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year	(E) Technical person- hours per year (E=CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost,\$ (a)
Report Review								
Initial Notification (b)	1.0	1.0	1.0	600.0	600.0	30.0	60.0	\$29,048
Notification of Compliance Status (c)	2.0	1.0	2.0	600.0	1200.0	60.0	120.0	\$58,095
Annual Compliance Certification (d)	2.0	1.0	2.0	0.0	0.0	0.0	0.0	\$0
								\$0
<b>TOTAL BURDEN AND COST (SALARY)</b>					1800.0	90.0	180.0	\$87,143

(a) Costs are based on the following hourly rates: technical at \$43.17, management at \$58.18, and clerical at \$23.36. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

(b) All 1,800 plants will submit the initial notification, leading to an average annual burden of 3 plants/yr.

(c) All 1,800 plants will submit the notification of compliance status, leading to an average annual burden of 3 plants/yr.

(d) All no plants will submit an annual compliance certification during the period since they have two years to comply.

Total  
hours 2,070

**ATTACHMENT 1. INFORMATION REQUIREMENTS--NESHAP FOR PREPARED FEEDS MANUFACTURING AREA SOURCES**

<b>Requirement</b>	<b>Citation for existing sources</b>	<b>Citation for new sources</b>	<b>General Provisions citation</b>
<b><i>Monitoring</i></b>	§63.11622	§63.11622	N/A
<b><i>Notifications</i></b>			
Notification of applicability	§63.1164(a)(1)	§63.1164(a)(1)	40 CFR 63.9(b)(2)
Notification of construction/reconstruction	N/A	N/A	40 CFR 63.9(b)(5)
Notification of special compliance requirements	N/A	N/A	40 CFR 63.9(d)
Notification of compliance status	§63.11624(a)(2)	§63.11624(a)(2)	40 CFR 63.9(h)
Notification of changes in information	N/A	N/A	40 CFR 63.9(j)
<b><i>Plans</i></b>	N/A	N/A	N/A
<b><i>Records</i></b>			
Records of notifications	§63.11624(c)(1)	§63.11624(c)(1)	40 CFR 63.10
Records that demonstrate continuous compliance	§63.11624(c)(2) – (5)	§63.11624(c)(2) – (5)	40 CFR 63.10
Monitoring information	§63.11624(c)(5)	§63.11624(c)(5)	40 CFR 63.10
<b><i>Reports</i></b>			
CMS performance evaluation/report	N/A	N/A	40 CFR 63.8(e)(5)
SSM reports	N/A	N/A	40 CFR 63.6(e)(3)
Excess emissions reports	N/A	N/A	40 CFR 63.10(e)(3)
Annual compliance certifications	§63.11624(b)	§63.11624(b)	N/A