SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (Renewal)
EPA ICR Number 1066.06, OMB Control Number 2060-0032

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Ammonium Sulfate Manufacturing Plants were proposed on February 4, 1980, and promulgated on November 12, 1980. These standards apply to each ammonium sulfate dryer within an ammonium sulfate manufacturing plant in the caprolactam by-product, synthetic, and coke oven by-products sectors of the ammonium sulfate manufacturing industry for which construction, modification or reconstruction commenced after the date of the proposal.

Owners or operators of the affected facilities described must make the following one-time-only reports: notification of the date of construction or reconstruction; notification of the anticipated and actual dates of startup; notification of any physical or operational change to an existing facility which may increase the regulated pollutant emission rate; and the notification of the date of the initial performance test. 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. These notifications, reports and records are required, in general, of all sources subject to NSPS.

Recordkeeping requirements specific to the ammonium sulfate industry provides information on the amount of ammonium sulfate processed and the operation of the emission control device. Owners or operators of affected facilities are required to install, calibrate, maintain, and operate a flow monitoring device which can be used to determine the mass-flow of ammonium sulfate feed material to the process, and which has an accuracy of plus or minus 5 percent across its operating range. However, if the plant uses weight scales of the same accuracy to directly measure production rates of ammonium sulfate, the use of flow monitoring devices is not required. Owners or operators of all affected facilities will install, calibrate, maintain, and operate a monitoring device which continuously measures and permanently records the total pressure drop across the emission control system.

Therefore, the recordkeeping requirements for ammonium sulfate plants consist of the occurrence and duration of all startups and malfunctions as described, the initial performance test results, amount of ammonium sulfate feed material, and the pressure drop across the emission control system. Records of startups, shutdowns and malfunctions will be noted as they

occur. Records of the performance test should include information necessary to determine the conditions of the performance test, and performance test measurements (including pressure drop across the emission control system) and results. The continuous monitoring system (CMS) will record pressure drop across the scrubbers continuously and automatically.

The reporting requirements for this industry include the initial notifications listed and the initial performance test results. 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 Environmental Protection Agency (EPA) regional office. Notifications are used to inform the Agency or delegated authority when a source becomes subject to the standard. The reviewing authority may then inspect the source to ensure that the pollution control devices are properly installed and operated, and the standard is being met. Performance test records are needed as these are the Agency records of a source's initial capability to comply with the emission standard.

Owners or operators of the affected facilities described are required to adhere to reporting requirements specific to this rule, e.g., provide information on the operation of emissions control devices. Semiannual excess emissions and monitoring systems reports are required to be submitted by the respondents.

Any owner or operator subject to the provisions of this part will 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. These records and reports are essential in determining compliance and are required of all sources subject to NSPS.

Based on the pre-existing number of applicable sources, approximately two sources are currently subject to the regulations. Due to the static nature of the industry, it is estimated that no additional sources will become subject to the standard over the next three years. This information is based on discussions with EPA personnel knowledgeable about the ammonium sulfate industry. The industry is dominated by facilities that have been operating prior to the proposed date of the rule (February 4, 1980), and there has been a long-term static or declining market for the product both domestically and globally. The average annual cost to industry over the next three years of this Information Collection Request (ICR) is estimated to be $23,183.

The Office of Management and Budget (OMB) approved the current Information Collection Request (ICR) without any “Terms of Clearance.”

The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost, NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by Federal employees or government contractors; this burden may be found below in Table 2: Average Annual EPA Burden, NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (Renewal).

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)(l).

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 the Administrator's judgment, particulate emissions from the ammonium sulfate manufacturing industry causes or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart PP.

2(b) Practical Utility/Users of the Data

The control of emissions of particulate from ammonium sulfate facilities requires the installation of properly designed equipment and the operation and maintenance of that equipment. Emissions of particulate from ammonium sulfate facilities are the result of the operation of the affected facilities. The subject standards are achieved by the reduction of particulate emissions using control technology and leak detection and repair (LDAR) procedures. The notifications required in the applicable regulations 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 regulations are being met.

Performance test reports are needed as these are the Agency records of a source’s initial capability to comply with the emission standards, and serve as a record of the operating conditions under which compliance was achieved. The information generated by the monitoring, recordkeeping and reporting requirement described in this ICR is used by the Agency to ensure that facilities which are affected by NSPS continue to operate the control equipment in compliance with the regulation. Adequate monitoring, recordkeeping and reporting are necessary to ensure compliance with the applicable regulations, as required by the Clean Air Act. In addition, the information collected from recordkeeping and reporting requirements is used for targeting inspections, and is of sufficient quality to be used as evidence in court.

3. Non-duplication, Consultations, and Other Collection Criteria

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

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agencies 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 on July 30, 2009 (74 FR 38004). No comments were received on the burden published in the Federal Register.

3(c) Consultations

For this information collection, a previous ICR renewal was used to obtain burden estimates since this ICR renewal was processed under the "Expedited Approach (renew without change)" option. Per this guidance, all data and assumptions from the previous ICR renewal were used as the basis for estimating the hourly and cost burdens associated with this renewal.

The ICR renewal for the year 2003 used several different resources to obtain the most recent data available for ammonium sulfate manufacturing plants. The most recent ICR and preparer of the ICR were referenced. The most recent data available (October 30, 2003) on the Air Facility System (AFS) database, which is maintained by the Office of Compliance, was accessed. The Office of Compliance Sector Notebook "*Profile of the Inorganic Chemical Industry*", information from the United States Census Bureau internet website, as well as other web sites covering ammonium sulfate manufacturing were reviewed. The EPA Office of Air Quality Planning and Standards, Information Transfer and Program Integration Division was consulted. In addition, multiple consultations with industry were conducted: the American Agricultural Economics Association (AAEA), Kay Snopek, (515) 233-3202; American Chemical Society, Hank Whalen, (202) 872-8724; Costal Chemical, Ms. Barbara Cabot, (307) 637-2700; Agrium, Mr. Robert Williams, (559) 627-5553; Florida Department of Environmental Protection (FCEP), Ms. Cindy Phillips, (850) 921-9534; and BP Chemicals, Incorporated, Mr. Kevin Sprague, (419) 226-1200.

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 a useful technique 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 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 ammonium sulfate manufacturing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is 2873 which corresponds to the North American Industry Classification System (NAICS) code 325311 for ammonium sulfate manufacturing facilities.

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

All data in this ICR that is recorded and/or reported is required by NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR part 60, subpart PP).

A source must make the following reports:

Notification Reports	Standard Citation by Section
Notification of construction or modification	60.7(a)(1)
Notification of initial startup	60.7(a)(3)
Notification of initial performance test	60.8(d)

Periodic Reports	Standard Citation by Section
Semiannual report	60.7(c)

A source must make the following reports:

Recordkeeping	
Initial performance test results	60.8(a)
Startup, shutdowns, and malfunctions	60.8(c)
Control device operating parameters (continuous)	60.423
Records should be retained for two years	60.7(f)

Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., a 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. It is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate control devices for particulate matter (PM).
Perform initial performance test, Reference Methods 9 and 5, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.

Respondent Activities
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.

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, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Air Facility System (AFS).

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 operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and to 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.

Information contained in the reports is entered into the AFS which is operated and maintained by the EPA Office of Compliance. AFS is the EPA database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for more than 100,000 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. 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 ammonium sulfate plant exceeds the criterion for small business. 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 requirements to be the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost, NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burdens 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 247 (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	$114.77 ($54.65 + 110%)
Technical	$97.59 ($46.47 + 110%)
Clerical	$48.26 ($22.98 + 110%)

These rates are from the U. S. Department of Labor, Bureau of Labor Statistics, March 2009, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit

packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only types of industry cost associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance 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)
N/A	N/A	N/A	N/A	N/A	N/A	N/A

The total capital/startup costs for this ICR are zero. This is the total of column D in the above table.

The devices used to record operating parameters must be installed and maintained by the respondents in order to operate the processing plant efficiently. Therefore, the total operation and maintenance (O&M) costs for this ICR are zero. This is the total of column G.

The total respondent costs 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 cost to industry over the next three years of the ICR is estimated to be zero.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA 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 $3,010 (rounded).

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

Managerial $61.36 (GS-13, Step 5, $38.35 + 60%)

Technical	$45.52 (GS-12, Step 1, $28.45 + 60%)
Clerical	$24.64 (GS-6, Step 3, $15.40 + 60%)

These rates are from the Office of Personnel Management (OPM), 2009 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden, NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (Renewal).

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

Based on our research for this ICR, approximately four existing sources are currently subject to the standard. It is estimated that no additional sources will become subject to the regulation in the next three years.

Number of respondents is calculated using the following table which addresses the three years covered by this ICR.

Number of Respondents

	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents	(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	2	0	0	2
2	0	2	0	0	2
3	0	2	0	0	2
Average	0	2	0	0	2

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

Total Annual Responses

(A) Number of New Respondents	(B) Number of Reports for New Respondents	(C) Number of Existing Respondents	(D) Number of Reports for Existing Respondents	(F) Number of Existing Respondents That Keep Records but Do Not Submit Reports	(E) Total Annual Responses E=(AxB)+(CxD)+F
0	0	2	2	0	4

The number of Total Annual Responses is 4. The total annual labor costs are $23,183 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost, NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (Renewal).

Note that the total annual capital and O&M costs to the regulated entity are zero. These costs are detailed in Section 6(b)(iii), Capital/Startup vs. Operation 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 in Tables 1 and 2, respectively. The annual public reporting and recordkeeping burden for this collection of information are estimated to average 62 hours per response.

6(f) Reasons for Change in Burden

There is an apparent increase of one hour in the total labor hours for this ICR. Total labor hours for this ICR is 247 rather than 246 in the previous ICR, because the previous ICR did not round labor hours up to the nearest whole number. There is no change in the per-respondent 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 respondents is very low, negative or non-existent. Therefore, the labor hours in the previous ICR reflect the current burden to the respondents and are reiterated (with a correction for rounding) in this ICR.

There is an increase in both respondent and Agency costs resulting from labor rate increases from the year 2003 to the year 2009. This ICR uses the year 2009 labor rates because burden and cost calculations in Tables 1 and 2 of this ICR were expanded to include managerial and clerical labor rates, and the previous ICR only provided a technical labor rate for the year 2003. This ICR is, therefore, updated to present the most recent available labor rates for each of the three labor categories.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 62 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 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-2009-0527. 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 3334, 1301 Constitution Avenue, N.W., Washington, D.C. 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, N.W., Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0527 and OMB Control Number 2060-0032 in any correspondence.

Part B of the Supporting Statement

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

TABLE 1: Annual Respondent Burden and Cost, NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (Renewal)

Reporting / Recordkeeping	(A) Hours per Occurrence	(B) Occurrences / Respondent/ Year	(C) Hours/ Respondent/ Year (C=AxB)	(D) Respondents/ Year	(E) Total Hours/ Year (E=CxD)	(F) Managerial Hours/ Year [a]	(G) Technical Hours/ Year [a]	(H) Clerical Hours/ Year [a]	(I) Cost/ Year [b]
1. APPLICATIONS		Not Applicable							
2. SURVEY AND STUDIES		Not Applicable							
3. REPORTING REQUIREMENTS									
New Sources c									
A. Read Instructions	1	1	1	0	0	0	0.0	0.0	0
B. Required Activities									
New Sources [c]									
Initial performance test [d]									
Ref Method 9 tests [f]	29.7	4	118.8	0	0	0	0.0	0.0	0
Ref Method 5 [f]	4	1	4	0	0	0	0.0	0.0	0
Repeat performance test [e]	4	0.2	0.8	0	0	0	0.0	0.0	0
Existing sources									
Monitoring of operations and emissions		Included in 3F							
C. Create Information		Included in 3B							
D. Gather Existing Information		Included in 3E							
E. Write Report									
New Sources									
Notification of construction/reconstruction	2	1	2	0	0	0	0.0	0.0	0
Notification of actual startup	2	1	2	0	0	0	0.0	0.0	0
Notification of initial performance test	2	1	2	0	0	0	0.0	0.0	0
Notification of demonstration of CMS	2	1	2	0	0	0	0.0	0.0	0

TABLE 1: Annual Respondent Burden and Cost, NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (Renewal)

Reporting / Recordkeeping	(A) Hours per Occurrence	(B) Occurrences / Respondent/ Year	(C) Hours/ Respondent/ Year (C=AxB)	(D) Respondents/ Year	(E) Total Hours/ Year (E=CxD)	(F) Managerial Hours/ Year [a]	(G) Technical Hours/ Year [a]	(H) Clerical Hours/ Year [a]	(I) Cost/ Year [b]
Report of initial performance test		Included in 3B							
Existing Sources									
Notification of operational change	2	1	2	0	0	0	0.0	0.0	0
Semiannual reports	16	2	32	2	64	3	55.7	5.6	6,019.03
Subtotal Reporting					64				$6,019
4. RECORDKEEPING REQUIREMENTS									
A. Read Instructions		Included in 3A							
B. Plan Activities		Included in 3B							
C. Implement Activities		Included in 3B							
D. Develop Record System		Not Applicable							
E. Time to Enter Information									
Records of operating parameters [f]	0.25	365	91.25	2	182.5	8	158.7	15.9	17,163.65
F. Audits		Not Applicable							
Subtotal Recordkeeping					183				$17,164
TOTAL ANNUAL BURDEN (rounded)					247				$23,183

Assumptions

a. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

b. We assume a technical labor rate of $97.59, managerial rate $114.77, and clerical rate of $48.26 from the United States Department of Labor, Bureau of Labor Statistics, March 2009, "Table 2. Civilian Workers, by occupational and industry group."

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 percent to account for the benefit packages available to those employed by private industry.

c. We assume that there will be no new sources (respondents) over the 3-year period of this ICR.

d. 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 Method 9 published in the 11th Edition of the Official Methods of Analysis of the Association of Official Analytical Chemists dated 1970. 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. The particulate matter concentration and volumetric flow rate of the effluent gas shall be determined by Method 5 which requires a sampling time and a sample volume for each run of at least 60 minutes and 1.50 dscm (53 dscf).

e. We assume 20 percent of initial performance tests must be repeated due to failure.

f. Sources are required to maintain a daily record of operating parameters. We assume records will be recorded 365 days per year.

TABLE 2: Average Annual EPA Burden - NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (Renewal)

Burden Items	(A) EPA Hours per Occurrence	(B) Occurrences per Plant per Year	(C) EPA Hours per Plant per Year (C=AxB)	(D) Plants per Year	(E) Total EPA Hours per Year (E=CxD)	(F) Managerial Hours per Year [a]	(G) Technical Hours per Year [a]	(H) Clerical Hours per Year [a]
Required Activities								
New Plant [a]								
Initial performance tests [b]	24	1	24	0	0	0	0	0
Repeat performance tests [c]	24	0.2	4.8	0	0	0	0	0
Report Review								
New Plant								
Notification of construction	2	1	2	0	0	0	0	0
Notification of initial startup	0.5	1	0.5	0	0	0	0	0
Notification of actual startup	0.5	1	0.5	0	0	0	0	0
Notification of initial test	0.5	1.2	0.6	0	0	0	0	0
Review test results	8	1.2	9.6	0	0	0	0	0
Notification of demonstration of CMS	0.5	1	0.5	0	0	0	0	0
Existing Plants								
Semiannual reports	8	2	16	2	32	1.4	27.8	2.8
TOTAL					32			
Salary [d, e]								
(1 person x 1.4 hrs/year x $114.77/hrs) + (1 person x 27.8 hrs/year x $97.59/hrs) + (1 person x 2.8 hrs/year x $48.26/hrs) = $3,009.52								
TOTAL ANNUAL BURDEN = $3,010 (rounded)								

Assumptions:

a. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.
b. We assume that there will be no new sources (respondents) over the 3-year period of this ICR.
c. We assume that EPA personnel attend all initial performance tests.
d. There will be no travel expenses associated with this ICR since we have assumed that no new sources will become subject to this rule over the 3-year period of this ICR.
e. The cost a technical labor rate of $97.59, managerial rate $114.77, and clerical rate of $48.26 from the United States Department of Labor, Bureau of Labor Statistics, March 2009, "Table 2. Civilian Workers, by occupational and industry group."