

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**Standards of Performance for Grain Elevators
(40 CFR part 60, Subpart DDa)
January 2014**

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

“Recordkeeping and Reporting Requirements for Grain Elevators (40 CFR Part 60, Subpart DDa).” The EPA ICR tracking number is 2497.01.

1(b) Characterization of Information Collection

The New Source Performance Standards (NSPS) for grain elevators (40 CFR part 60, subpart DD) were promulgated on August 3, 1978. This information collection request is for a new subpart DDa, which will apply to grain elevators which commence construction, modification, or reconstruction after the date of proposal. Particulate matter (PM) is the pollutant regulated under this subpart. The grain elevators NSPS regulates affected facilities at grain storage elevators and grain terminal elevators storing corn, wheat, sorghum, rice, rye, oats, barley, and soybeans constructed or modified after August 3, 1978. Affected facilities at grain elevators include grain handling equipment, grain dryers, and grain loading and unloading facilities (for trucks, railcars, and barges/ships). This information is being collected to assure compliance with 40 CFR part 60, subpart DDa.

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. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NSPS. This information collection request documents the additional recordkeeping and reporting burden due to the proposed subpart DDa only, burden which facilities already incur due to subpart DD is not included. The additional requirements include opacity testing, PM testing, weekly visual inspections, and fabric filter inspections.

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 2 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.

This ICR presents the burden to respondents and the Designated Administrator (State or Federal Government) that will be imposed by the plans developed to implement the standards of

performance for new grain elevators. Respondents are owners or operators of new or modified grain elevators.

The requirements described below are the minimum requirements established by the standards of performance for grain elevators. Although the Designated Administrator may choose to impose more stringent requirements, it is assumed for this burden estimate that the implemented plans mirror the NSPS.

Potential respondents are owners or operators of new, reconstructed, or modified grain elevators. It is estimated that an additional 2 newly constructed grain elevators with 22 affected facilities and 71 modified or reconstructed grain elevators with 113 affected facilities will become subject to the regulation in the next three years. The cost of this Information Collection Request (ICR), based on these 73 grain elevators, will be \$1.1 million.

The burden to the “Affected Public” for each grain elevator may be found in Tables 1 - 4 in Attachment 1. The burden to the “Designated Administrator” is attributed entirely to work performed by federal employees or government contractors; this burden may be found in Tables 5 - 8 of Attachment 2.

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 system of emission reduction which (taking into account the cost of achieving such reduction and 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 system of emission reduction (BSER). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight 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, PM emissions from grain elevators cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS will be proposed for this source category at 40 CFR part 60, subpart DDa.

2(b) Use/Users of the Data

The information will be used by Designated Administrators' enforcement personnel to ensure that the requirements of the State (or Federal) plan are being implemented and are complied with on a continuous basis. Specifically, the information will be used by the Designated Administrator to: (1) identify new, modified, and reconstructed sources subject to the NSPS; (2) ensure that the NSPS is being properly applied; and (3) ensure that the emission limits are being complied with.

In addition, records and reports are necessary to enable the Designated Administrator to identify grain elevators that may not be in compliance with the NSPS. Based on reported information, the Designated Administrator will decide which facilities should be inspected and what records or units should be inspected at the facilities. The records that grain elevators maintain will indicate to the Designated Administrator whether facility personnel are properly operating and maintaining the incinerator and control equipment and whether facility personnel have met the qualification requirements.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

The requested recordkeeping and reporting will be required under (40 CFR part 60, subpart DDa).

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 prior to ICR submission to OMB

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

3(c) Consultations

During development of the proposed revisions, EPA held meetings and conference calls with a coalition representing grain elevator owners and operators. We estimate that approximately 73 grain elevators will be constructed, modified, or reconstructed, or expanded over the next 3 years.

3(d) Effects of Less Frequent Data Collection

The NSPS require initial and periodic performance tests and weekly visual monitoring. The frequency of these activities was chosen by EPA as the period that will provide an adequate margin of assurance that affected facilities will not operate for extended periods in violation of the NSPS.

Less frequent information collection would decrease the margin of assurance that plants are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and 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

Some respondents may consider grain throughput data to be confidential. Any such 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

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements are grain elevators. The North American Industry Classification System (NAICS) code for respondents affected by the standards are 49313 (grain elevators, storage), and 424510 (grain elevators, merchants and wholesalers).

Based on the assumed distribution of new or modified facilities, there are 73 grain elevators which will be affected. Of these, 100 percent are assumed to be located in the private sector.

4(b) Information Requested

(i) Data Items, Including Recordkeeping Requirements.

All data in this ICR that is recorded and/or reported is required by the NSPS for Grain Elevators (40 CFR part 60, subpart DDa).

A source must make the following reports:

Reports for 40 CFR part 60, subpart DDa	
Notification of construction or modification application	60.6(a)
Notification of construction/reconstruction	60.7(a)(1)
Initial notifications	60.7(a)(3)
Notification of actual startup	60.7(a)(3)
Physical or operational change	60.7(a)(4)
Notification of demonstration of continuous monitoring system	60.7(a)(5)
PM and opacity test results	60.8(a), 60.306a(a), 60.306a(b)
Compliance status	60.7(a)(7)
Malfunction report	60.7(b), 60.306a(d)

A source must maintain the following records:

Records for 40 CFR part 60, subpart DDa	
Records are required to be retained for two (2) years	60.7(f)
Records of ongoing monitoring	60.7(f)
Records of grain storage capacity and annual throughput	60.305a(a) and (b)
Physical or operational change	60.7(a)(4)
Notification of demonstration of continuous monitoring system	60.7(a)(5)
Initial performance test results	60.8(a)
Records of visual inspections	60.305a(e)
Records of baghouse and fabric filter inspections	60.305a(d)
Records of opacity tests	60.305a(f)
Records when an affected source failed to meet the standard	60.305a(c)

(ii) Respondent Activities

The respondent activities required by subpart DDa are listed in the following table.

Respondent Activities

Read instructions
Write the notifications and reports listed above
Enter information required to be recorded above
Train personnel to be able to respond to a collection of information
Transmit or otherwise disclose the information

This ICR captures the additional costs due to the proposed NSPS subpart DDa, as compared to the requirements of NSPS subpart DD. The additional activities include conducting opacity tests, PM tests, weekly visual inspections, and fabric filter inspections. Opacity tests must be conducted for affected dryers, grain loading stations, grain unloading stations, and grain handling operations, PM and opacity tests must be conducted for facilities that exceed the storage capacity threshold due to the use of temporary storage facilities.

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 opacity and PM tests.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.

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. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The reports of noncompliance 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 the AIRS Facility Subsystem (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 and annual emission inventory data for over 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.

The records required by this regulation must be retained by the owner or operator for two years.

5(c) Small Entity Flexibility

In the proposed rule, we have provided flexibility to all grain elevators, including small entities, by requiring only the minimum frequency of testing, and recordkeeping and reporting that will also ensure compliance with the rules. The rule does not require monitoring equipment that would result in capital and operating costs, but instead proposes visual inspection of equipment at the minimum frequencies needed to ensure compliance.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Tables 1 through 3: Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Grain Elevators (40 CFR Part 60, Subpart DDa) for the first three years of the information collection.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

Tables 1 through 3: Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Grain Elevators (40 CFR Part 60, Subpart DDa) document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for each of the first 3 years. Table 4 contains a summary of the respondent burden costs and hours detailed in Tables 1 through 3.

The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified; responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The baseline population of 73 new or modified grain elevators is based upon past growth in consideration with the requirements of the NSPS rule.

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 3,300 hours. These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge, and experience with the NSPS program, and any comments received.

6(b) Estimating Respondent Costs

The information collection activities for sources subject to these requirements are presented in Tables 1 through 3 of Attachment 1. The total cost for each respondent activity includes labor costs, capital/startup costs, and operating and maintenance (O&M) costs.

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$78.06 (\$37.17 + 110%)
Technical	\$30.28 (\$14.42 + 110%)
Clerical	\$26.75 (\$12.74 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2011, “National Industry-Specific Occupational Employment and Wage Estimates, NAICS 424500.” The rates are from column 8, mean hourly wage. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Start-up and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the grain elevator NSPS are both labor costs, which are addressed elsewhere in this ICR, and the costs associated with opacity testing, PM testing, and reading the rule. The capital/startup costs are onetime costs when a facility becomes subject to the regulation (i.e., reading the rule). The annual operation and maintenance costs are the ongoing costs to perform testing and other costs such as photocopying and postage.

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

Below are the estimated capital and startup costs and O&M costs for the affected grain elevators for the first 3 years after proposal.

Capital/Startup vs. Operation and Maintenance (O&M) Costs				
	(B) Number of Respondents (facilities)	(C) Total Capital/Startup Costs	(D) Total Annualized Capital/Start-up and O&M over 3 years	(E) Average Annual Capital/Startup and O&M Costs
Grain Elevators	73	\$13,000	\$795,000	\$265,000

The total capital/startup costs for this ICR are \$13,000.

The total annualized capital/startup and O&M costs for this ICR are \$794,000, or an average of \$264,000 per year. These are recordkeeping costs.

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'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 \$54,000.

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

Managerial	\$62.27 (GS-13, Step 5, \$38.92+ 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88+ 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2010 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for overhead and fringe benefit costs. Details on the line item estimates used to calculate these burdens are presented in Tables 5 through 8 of Attachment 2.

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

The total number of respondents is also referred to as the respondent universe. The respondent universe for this ICR is based upon past growth in consideration with the requirements of the NSPS rule. Industry burden is calculated based on the number of units and the anticipated controls and monitoring that each unit will most likely utilize to comply with the proposed NSPS.

Additional estimates regarding the respondent universe are included in the industry burden determination. The EPA estimates that 73 respondents (grain elevators) will read the rule over the course of three years, perform initial and annual opacity tests with a report, conduct weekly visual monitoring, and conduct fabric filter inspections.

Total Annual Responses			
(A) Unit Type	(B) Number of Respondents (facilities)	(C) Total Number Responses for 3-year Period	(D) Average Annual Number of Responses
Grain Elevators	73	279	93

The number of average annual responses is 93.

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. The annual public reporting and recordkeeping burden for this collection of information is estimated to average 36 hours per response.

(i) The Respondent Tally

A breakdown for each of the collection, reporting, and recordkeeping activities required by the NSPS is presented in Tables 1 through 4 of Attachment 1. Tables 1, 2, and 3 show the costs for grain elevators in years 1, 2, and 3. Table 4 summarizes the costs for the three year period. The estimate of total annual hours requested from the respondents was based on the assumptions outlined in section 6(d) of this ICR. The respondent burden is estimated for the first 3 years after adoption of the NSPS by totaling the hours per year for technical, managerial, and clerical staff at the plant. This total was then divided by 3 to arrive at the annualized burden (see Table 4). A similar approach was taken for estimating annual labor costs. For the first three years after the adoption of subpart DDa, it is estimated that industry would expend 3,300 hours annually at a cost of \$110,000 per year to meet the monitoring, recordkeeping, and reporting requirements. The annual non-labor costs are estimated at \$260,000, which include the annual costs associated with initial and annual opacity and PM testing.

(ii) The Designated Administrator

The bottom line Designated Administrator burden hours and costs, presented in Tables 5 through 7 of Attachment 2, were calculated by totaling the hours per year for technical, managerial, and clerical staff, and by totaling the cost column. Table 8 of Attachment 2 summarizes the annual agency burden for each of the first three years and calculates the average annual burden by dividing the three year total by three. The estimated average annual burden over the first 3 years for the Designated Administrator would be 810 hours at a cost of \$54,000 per year.

(iii) Variations in the annual bottom line

The total respondent costs for years 1, 2, and 3 are \$195,000, \$345,000, and \$573,000. The corresponding total respondent hours over these periods are 1800, 3200, and 4900 (see Tables 1 through 4 of Attachment 1). Activities include reading and understanding the rule, annual opacity and PM testing and writing a corresponding report, weekly visual monitoring, fabric filter inspections, and all recordkeeping.

During the first 3 years, the Designated Administrators will be reviewing the regulation, observing opacity tests, and reviewing test reports. In years 1, 2, and 3, the Designated Administrators will expend 1000, 560, and 870 total hours in labor, respectively. The corresponding costs for each year are \$54,000, \$42,000, and \$65,000 (see Tables 5 through 8 of Attachment 2).

6(f) Reasons for change in burden

There is no change in burden because this is a new Information Collection for subpart

DDa.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to be 36 hours per response. Burden means total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

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-OAR-2010-0706. 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 Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1927. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2010-0706 in any correspondence.

PART B OF THE SUPPORTING STATEMENT

This section is not applicable because statistical methods are not used in data collection associated with this regulation.

ATTACHMENT 1

TABLES 1, 2, 3, and 4

Tables 1 - 3: Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Grain Elevators, Subpart DDa – Years 1-3

Table 4: Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Grain Elevators, Subpart DDa

Table 1 - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Grain Elevators - Subpart DDa - Year 1

Burden Item	(A) Respondent Hours Per Occurrence (Technical hours)	(B) Non- Labor Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Technical Hours Per Respondent Per Year (A x D)	(E) Number of Respondents Per Year	(F) Technical Hours Per Year (D x E)	(G) Clerical Hours Per Year (F x 0.1)	(H) Management Hours Per Year (F x .05)	(I) Total Labor Costs Per Year	(J) Total Non- Labor Capital Costs Per Year [(B+C)xD xF]	(K) Total Number of Responses Per Year (D x F)	Footnotes
1. Applications	n/a											
2. Surveys and Studies	n/a											
3. Reporting Requirements												
A. Read and Understand Rule Requirements	5	\$0	1	5	25	123	12	6	\$4,515	\$0	0	a
B. Required Activities												
1. Opacity Test	0	\$2,540	1	0	49	0	0	0	\$0	\$123,443	0	b
2. Visual Inspection	0.25	\$0	52	13	49	632	63	32	\$23,288	\$0	0	b
3. Fabric Filter Inspections	1	\$0	2	2	24	48	5	2	\$1,769	\$0	0	b
4. PM Test	1	\$12,192	1	0	1	0	0	0	\$0	\$12,192	0	c
C. Create Information	n/a											
D. Gather Information	n/a											
E. Report Preparation												
1. Opacity Test Results	5	\$0	1	5	49	243	24	12	\$8,957	\$0	49	b
2. PM Test Results	5	\$0	1	5	1	5	1	0	\$184	\$0	1	c
<i>Reporting Subtotal</i>						1,050	105	53	\$38,714	\$135,635	50	
4. Recordkeeping Requirements												
A. Read Instructions	Inc. in 3.A											
B. Implement Activities	n/a											
C. Develop Record System	n/a											
D. Record Information												
1. Records of Opacity Testing	2	\$0	1	2	49	97	10	5	\$3,583	\$0	0	b
2. Records of Visual Inspection	0.17	\$0	52	9	49	430	43	21	\$15,836	\$0	0	b
3. Records of Fabric Filter Inspections	0.5	\$0	2	1	24	24	2	1	\$885	\$0	0	b
4. Records of PM Testing	2	\$0	2	4	1	4	0	0	\$147	\$0	0	c
E. Personnel Training	n/a											
F. Time for Audits	n/a											
<i>Recordkeeping Subtotal</i>						555	55	28	\$20,451	\$0	0	
TOTAL						1,605	161	80	\$59,165	\$135,635	50	

- a. One-time cost for each grain elevator or affected facility, occurs in year facility is applicable.
- b. Based on number of affected facilities which start compliance in year 1.
- c. Based on number of facilities that exceed capacity thresholds due to use of TSF.

Table 2 - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Grain Elevators - Subpart DDa - Year 2

Burden Item	(A) Respondent Hours Per Occurrence (Technical hours)	(B) Non- Labor Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Technic al Hours Per Respondent Per Year (A x D)	(E) Number of Respondents Per Year	(F) Technica l Hours Per Year (D x E)	(G) Clerical Hours Per Year (F x 0.1)	(H) Managem ent Hours Per Year (F x .05)	(I) Total Labor Costs Per Year	(J) Total Non- Labor Capital Costs Per Year [(B+C)xD xF]	(K) Total Number of Respon ses Per Year (D x F)	Footnotes
1. Applications	n/a											
2. Surveys and Studies	n/a											
3. Reporting Requirements												
A. Read and Understand Rule Requirements	5	\$0	1	5	24	118	12	6	\$4,331	\$0	0	a
B. Required Activities												
1. Opacity Test	0	\$2,540	1	0	86	0	0	0	\$0	\$218,946	0	b
2. Visual Inspection	0.25	\$0	52	13	86	1,121	112	56	\$41,306	\$0	0	b
3. Fabric Filter Inspections	1	\$0	2	2	45	90	9	5	\$3,317	\$0	0	b
4. PM Test	1	\$12,192	1	0	2	0	0	0	\$0	\$24,384	0	c
C. Create Information	n/a											
D. Gather Information	n/a											
E. Report Preparation												
1. Opacity Test Results	5	\$0	1	5	86	431	43	22	\$15,887	\$0	86	b
2. PM Test Results	5	\$0	1	5	2	10	1	1	\$369	\$0	2	c
<i>Reporting Subtotal</i>						1,769	177	88	\$65,209	\$243,329	88	
4. Recordkeeping Requirements												
A. Read Instructions	Inc. in 3.A											
B. Implement Activities	n/a											
C. Develop Record System	n/a											
D. Record Information												
1. Records of Opacity Testing	2	\$0	1	2	86	172	17	9	\$6,355	\$0	0	b
2. Records of Visual Inspection	0.17	\$0	52	9	86	762	76	38	\$28,088	\$0	0	b
3. Records of Fabric Filter Inspections	0.5	\$0	2	1	45	45	5	2	\$1,659	\$0	0	b
4. Records of PM Testing	2	\$0	2	4	2	8	1	0	\$295	\$0	0	c
E. Personnel Training	n/a											
F. Time for Audits	n/a											
<i>Recordkeeping Subtotal</i>						987	99	49	\$36,396	\$0	0	
TOTAL						2,757	276	138	\$101,606	\$243,329	88	

- a. One-time cost for each grain elevator or affected facility, occurs in year facility is applicable.
- b. Based on number of affected facilities which start compliance in year 2 plus year 1.
- c. Based on number of facilities that exceed capacity thresholds due to use of TSF.

Table 3 - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Grain Elevators - Subpart DDa - Year 3

Burden Item	(A) Respondent Hours Per Occurrence (Technical hours)	(B) Non- Labor Costs Per Occurrence	(C) Number of Occurrences Per Respondent Per Year	(D) Technic al Hours Per Respondent Per Year (A x D)	(E) Number of Respondents Per Year	(F) Technica l Hours Per Year (D x E)	(G) Clerical Hours Per Year (F x 0.1)	(H) Managem ent Hours Per Year (F x .05)	(I) Total Labor Costs Per Year	(J) Total Non- Labor Capital Costs Per Year [(B+C)xD xF]	(K) Total Number of Respon ses Per Year (D x F)	Footnotes
1. Applications	n/a											
2. Surveys and Studies	n/a											
3. Reporting Requirements												
A. Read and Understand Rule Requirements	5	\$0	1	5	25	123	12	6	\$4,515	\$0	0	a
B. Required Activities												
1. Opacity Test	0	\$2,540	1	0	135	0	0	0	\$0	\$342,388	0	b
2. Visual Inspection	0.25	\$0	52	13	135	1,752	175	88	\$64,594	\$0	0	b
3. Fabric Filter Inspections	1	\$0	2	2	70	140	14	7	\$5,160	\$0	0	b
4. PM Test	1	\$12,192	1	0	6	0	0	0	\$0	\$73,151	0	c
C. Create Information	n/a											
D. Gather Information	n/a											
E. Report Preparation												
1. Opacity Test Results	5	\$0	1	5	135	674	67	34	\$24,844	\$0	135	b
2. PM Test Results	5	\$0	1	5	6	30	3	2	\$1,106	\$0	6	c
<i>Reporting Subtotal</i>						2,719	272	136	\$100,219	\$415,539	141	
4. Recordkeeping Requirements												
A. Read Instructions	Inc. in 3.A											
B. Implement Activities	n/a											
C. Develop Record System	n/a											
D. Record Information												
1. Records of Opacity Testing	2	\$0	1	2	135	270	27	13	\$9,938	\$0	0	b
2. Records of Visual Inspection	0.17	\$0	52	9	135	1,192	119	60	\$43,924	\$0	0	b
3. Records of Fabric Filter Inspections	0.5	\$0	2	1	70	70	7	4	\$2,580	\$0	0	b
4. Records of PM Testing	2	\$0	2	4	6	24	2	1	\$885	\$0	0	c
E. Personnel Training	n/a											
F. Time for Audits	n/a											
<i>Recordkeeping Subtotal</i>						1,555	156	78	\$57,326	\$0	0	
TOTAL						4,274	427	214	\$157,546	\$415,539	141	

- a. One-time cost for each grain elevator or affected facility, occurs in year facility is applicable.
- b. Based on number of affected facilities which start compliance in year 3 plus years 1 and 2.
- c. Based on number of facilities that exceed capacity thresholds due to use of TSF.

Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Grain Elevators - Subpart DDa

Year	Technical Hours	Clerical Hours	Management Hours	Total Hours	Labor Costs	Non-Labor (Annualized Capital/Startup and O&M) Costs	Total Costs
1	1,605	161	80	1,846	\$59,165	\$135,635	\$194,800
2	2,757	276	138	3,170	\$101,606	\$243,329	\$344,935
3	4,274	427	214	4,915	\$157,546	\$415,539	\$573,085
Total	8,636	864	432	9,931	\$318,316	\$794,503	\$1,112,820
Average	2,879	288	144	3,310	\$106,105	\$264,834	\$370,940

ATTACHMENT 2

TABLES 5, 6, 7, and 8

Tables 5 - 7: Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Grain Elevators, Subpart DDa - Years 1-3

Table 8: Summary of Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Grain Elevators, Subpart DDa

Table 5 - Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Grain Elevators - Subpart DDa - Year 1

Burden Item	(A) EPA hours per occurrence	(B) Number of occurrences per year	(C) Technical Hours Per Year (AxB)	(D) Management Hours Per Year (Cx0.05)	(E) Clerical Hours Per Year (Cx0.1)	EPA Cost Per Year	Footnotes
1. Read and Understand Rule Requirements	10	60	600	30	60	\$31,095	a
2. Enter and Update Information Into Agency Recordkeeping System	2	0	0	0	0	\$0	b
3. Required Activities							
A. Observe Performance Test	5	10	50	3	5	\$2,591	c
B. Excess Emissions Enforcement Activities	24	5	120	6	12	\$6,219	d
4. Reporting Requirements							
A. Review Opacity Test Reports	2	49	97.2	5	10	\$5,037	e
B. Review PM Test Reports	2	1	2	0	0	\$104	f
5. Travel Expenses for Tests Attended: 2 days * (\$110 hotel + \$58 meals/incidentals) + (\$600 round trip) = \$936 per trip						\$9,360	
Total			869.2	43	87	\$54,406	

- a. Number of occurrences is the number of states where affected sources will exist and each EPA Region (50 states + 10 EPA regions = 60 respondents).
- b. Information will not need to be updated as a result of subpart DDa.
- c. Assumes EPA personnel attend 20 percent of the opacity and PM tests.
- d. Number of occurrences is based on the assumption that of the units that test, 10% of them will have exceedances and need enforcement.
- e. Number of occurrences is the number of units which must perform opacity tests.
- f. Number of occurrences is the number of units which perform PM tests.

Table 6 - Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Grain Elevators - Subpart DDa - Year 2

Burden Item	(A) EPA hours per occurrence	(B) Number of occurrences per year	(C) Technical Hours Per Year (AxB)	(D) Management Hours Per Year (Cx0.05)	(E) Clerical Hours Per Year (Cx0.1)	EPA Cost Per Year	Footnotes
1. Read and Understand Rule Requirements	10	0	0	0	0	\$0	a
2. Enter and Update Information Into Agency Recordkeeping System	2	0	0	0	0	\$0	b
3. Required Activities							
A. Observe Performance Test	5	18	90	5	9	\$4,664	c
B. Excess Emissions Enforcement Activities	24	9	216	11	22	\$11,194	d
4. Reporting Requirements							
A. Review Opacity Test Reports	2	86	172.4	9	17	\$8,935	e
B. Review PM Test Reports	2	2	4	0	0	\$207	f
5. Travel Expenses for Tests Attended: 2 days * (\$110 hotel + \$58 meals/incidentals) + (\$600 round trip) = \$936 per trip						\$16,848	
Total			482.4	24	48	\$41,848	

- a. Number of occurrences is the number of states where affected sources will exist and each EPA Region (50 states + 10 EPA regions = 60 respondents).
- b. Information will not need to be updated as a result of subpart DDa.
- c. Assumes EPA personnel attend 20 percent of the opacity and PM tests.
- d. Number of occurrences is based on the assumption that of the units that test, 10% of them will have exceedances and need enforcement.
- e. Number of occurrences is the number of units which must perform opacity tests.
- f. Number of occurrences is the number of units which perform PM tests.

Table 7 - Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Grain Elevators - Subpart DDa - Year 3

Burden Item	(A) EPA hours per occurrence	(B) Number of occurrences per year	(C) Technical Hours Per Year (AxB)	(D) Management Hours Per Year (Cx0.05)	(E) Clerical Hours Per Year (Cx0.1)	EPA Cost Per Year	Footnotes
1. Read and Understand Rule Requirements	10	0	0	0	0	\$0	a
2. Enter and Update Information Into Agency Recordkeeping System	2	0	0	0	0	\$0	b
3. Required Activities							
A. Observe Performance Test	5	28	140	7	14	\$7,255	c
B. Excess Emissions Enforcement Activities	24	14	336	17	34	\$17,413	d
4. Reporting Requirements							
A. Review Opacity Test Reports	2	135	269.6	13	27	\$13,972	e
B. Review PM Test Reports	2	6	12	1	1	\$622	f
5. Travel Expenses for Tests Attended: 2 days * (\$110 hotel + \$58 meals/incidentals) + (\$600 round trip) = \$936 per trip						\$26,208	
Total			757.6	38	76	\$65,470	

- a. Number of occurrences is the number of states where affected sources will exist and each EPA Region (50 states + 10 EPA regions = 60 respondents).
- b. Information will not need to be updated as a result of subpart DDa.
- c. Assumes EPA personnel attend 20 percent of the opacity and PM tests.
- d. Number of occurrences is based on the assumption that of the units that test, 10% of them will have exceedances and need enforcement.
- e. Number of occurrences is the number of units which must perform opacity tests.
- f. Number of occurrences is the number of units which perform PM tests.

Table 8 - Summary of Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements for the NSPS for Grain Elevators - Subpart DDa

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs	Total Costs
1	869	43	87	1,000	\$54,406	\$0	\$54,406
2	482	24	48	555	\$41,848	\$0	\$41,848
3	758	38	76	871	\$65,470	\$0	\$65,470
Total	2,109	105	211	2,426	\$161,724	\$0	\$161,724
Average	703	35	70	809	\$53,908	\$0	\$53,908