Table 1 - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Phosphoric Acid and Phosphate Fertilizers NESHAP - 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 Costs Per Year (B x C x E)	(K) Total Number of Responses per Year (C X E)	Footnotes
1. Applications	NA											
2. Surveys and Studies	NA											
3. Reporting Requirements												
A. Read Rule	20	$0	1	20	23	460	46	23	$43,471	$0	0	a
B. Required Activities												
1. Mercury testing	10	$6,400	1	10	0	0	0	0	$0	$0	0	b
2. Hydrogen fluoride testing												c
a. Incremental 320 Cost	0	$8,000	1	0	0	0	0	0	$0	$0	0	c
b. Oxidation Reactors, Defluorination Units, & Clarifiers	10	$15,000	1	10	0	0	0	0	$0	$0	0	c
3. TF testing: Oxidation, Defluorination, & Clarifiers	10	$5,600	1	10	8	80	8	4	$7,560	$44,800	0	i
4. Performance evaluation	0	$2,000	1	0	23	0	0	0	$0	$46,000	0	d
C. Create Information	Inc. in 3B											
D. Gather Information	Inc. in 3E											
E. Report Preparation												
1. Performance test report	10	$0	1	10	7	70	7	4	$6,615	$0	7	e
2. Develop monitoring plan	15	$0	1	15	23	345	35	17	$32,603	$0	23	f
3. Prepare gypsum stack management plan	20	$0	1	20	12	240	24	12	$22,681	$0	12	g
Reporting Subtotal						1195	120	60	$112,930	$90,800	42	
4. Recordkeeping Requirements												
A. Read Instructions	Inc. in 3A											
B. Implements Activities	NA											
C. Develop Record System	NA											
D. Record information												
1. Records of Hg testing	3	$0	1	3	0	0	0	0	$0	$0	0	
2. Records of HF/TF testing	3	$0	1	3	8	24	2	1	$2,268	$0	0	
3. Records of Hg control device	10	$0	1	10	0	0	0	0	$0	$0	0	h
E. Personnel Training	Inc. in 3B											
F. Time for Audits	NA											
Recordkeeping Subtotal						24	2	1	$2,268	$0	0	
TOTAL						1219	122	61	$115,198	$90,800	42	

	Total Hours	Labor	Non-Labor	Total
Summary of Respondent Burden	1,402	$115,198	$90,800	$205,998
Initial Capital and Startup			$43,471	
Annualized Capital/Start-up and O & M			$134,271	

Footnotes:

(a) Facilities must read Subparts AA and BB, first year only. There are 23 process units at the 13 facilities, 12 phosphoric acid units and 11 phophate fertilizer units.

(b) Facilities are not subject to annual Hg testing the first or second years, costs are provided in year 3.

(c) Facilities are not subject to annual HF testing the first year, costs are provided in years 2 and 3.

(d) Facilities must follow performance evaluation criteria (calibrations) for control devices. There are 23 process units at the 13 facilities, 12 phosphoric acid units and 11 phophate fertilizer units.

(e) Includes additional data submitted for Hg and HF tests, for emission points not currently tested. The facilities' emission points that currently conduct TF tests are not considered, as they must already report their data. No additional Hg and HF tests would be performed in year 1.

(f) Includes development of CPMS performance evaluations/calibration for scrubbers. There are 23 process units at the 13 facilities, 12 phosphoric acid units and 11 phophate fertilizer units.

(g) Includes preparation of gypsum stack and cooling pond management plan for the 12 phosphoric acid facilities. Assumed that each facility would already be employing one of the control measures, so additional costs to implement a control measure were not estimated.

(h) One facility will install a carbon adsorption system and must determine the carbon bed life; costs not applicable until year 3.

(i) There are 8 emission points (oxidation reactors, defluorination units, and clarifiers) that are currently not tested, but are applicable as noted in the subpart AA clarifications. These emissions points will conduct total fluoride tests in year 1, before transitioning to HF testing in years 2 and 3.

Table 2 - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Phosphoric Acid and Phosphate Fertilizers NESHAP - 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) 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 Costs Per Year (B x C x E)	(K) Total Number of Responses per Year (C X E)	Footnotes
1. Applications	NA											
2. Surveys and Studies	NA											
3. Reporting Requirements												
A. Read Rule	20	$0	1	20	0	0	0	0	$0	$0	0	a
B. Required Activities												
1. Mercury testing	10	$6,400	1	10	0	0	0	0	$0	$0	0	b
2. Hydrogen fluoride testing												c
a. Incremental 320 Cost	0	$8,000	1	0	78	0	0	0	$0	$624,000	0	c
b. Oxidation Reactors, Defluorination Units, & Clarifiers	10	$15,000	1	10	8	80	8	4	$7,560	$120,000	0	c
3. TF testing: Oxidation, Defluorination, & Clarifiers	10	$5,600	1	10	0	0	0	0	$0	$0	0	g
4. Performance evaluation	0	$2,000	1	0	23	0	0	0	$0	$46,000	0	d
C. Create Information	Inc. in 3B											
D. Gather Information	Inc. in 3E											
E. Report Preparation												
1. Performance test report	10	$0	1	10	7	70	7	4	$6,615	$0	7	e
2. Develop monitoring plan	15	$0	1	15	0	0	0	0	$0	$0	0	a
3. Prepare gypsum stack management plan	20	$0	1	20	0	0	0	0	$0	$0	0	a
Reporting Subtotal						150	15	8	$14,175	$790,000	7	
4. Recordkeeping Requirements												
A. Read Instructions	Inc. in 3A											
B. Implements Activities	NA											
C. Develop Record System	NA											
D. Record information												
1. Records of Hg testing	3	$0	1	3	0	0	0	0	$0	$0	0	
2. Records of HF testing	3	$0	1	3	8	24	2	1	$2,268	$0	0	
3. Records of Hg control device	10	$0	1	10	0	0	0	0	$0	$0	0	f
E. Personnel Training	Inc. in 3B											
F. Time for Audits	NA											
Recordkeeping Subtotal						24	2	1	$2,268	$0	0	
TOTAL						174	17	9	$16,443	$790,000	7	

Summary of Respondent Burden	Total Hours	Labor	Non-Labor	Total
	200	$16,443	$790,000	$806,443
Initial Capital and Startup			$0	
Annualized Capital/Start-up and O & M			$790,000	

Footnotes:

(a) Only applicable to first year.

(b) Facilities are not subject to annual Hg testing the first or second years, costs are provided in year 3.

(c) Must perform annual HF testing. For 78 emission points, the incremental cost for using Method 320 versus 13B are included ($8,000). There are 8 emission points (oxidation reactors, defluorination units, and clarifiers) that are currently not tested, but are applicable as noted in the subpart AA clarifications (they would incur the full Method 320 cost of $15,000).

(d) Facilities must follow performance evaluation criteria (calibrations) for control devices. There are 23 process units at the 13 facilities, 12 phosphoric acid units and 11 phophate fertilizer units.

(e) Includes additional data submitted for Hg and HF, for emission points not currently tested. The facilities' emission points that currently conduct TF tests are not considered, as they must already report their data. Only facilities that perform HF tests are included in year 2 costs.

(f) One facility will install a carbon adsorption system and must determine the carbon bed life; costs not applicable until year 3.

(g) Facilities will perform HF tests instead of TF tests from year 2 forward.

Table 3 - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Phosphoric Acid and Phosphate Fertilizers NESHAP - 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) 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 Costs Per Year (B x C x E)	(K) Total Number of Responses per Year (C X E)	Footnotes
1. Applications	NA											
2. Surveys and Studies	NA											
3. Reporting Requirements												
A. Read Rule	20	$0	1	20	0	0	0	0	$0	$0	0	a
B. Required Activities												
1. Mercury testing	10	$6,400	1	10	7	70	7	4	$6,615	$44,800	0	b
2. Hydrogen fluoride testing												c
a. Incremental 320 Cost	0	$8,000	1	0	78	0	0	0	$0	$624,000	0	c
b. Oxidation Reactors, Defluorination Units, & Clarifiers	10	$15,000	1	10	8	80	8	4	$7,560	$120,000	0	c
3. TF testing: Oxidation, Defluorination, & Clarifiers	10	$5,600	1	10	0	0	0	0	$0	$0	0	g
4. Performance evaluation	0	$2,000	1	0	23	0	0	0	$0	$46,000	0	d
C. Create Information	Inc. in 3B											
D. Gather Information	Inc. in 3E											
E. Report Preparation												
1. Performance test report	10	$0	1	10	8	80	8	4	$7,560	$0	8	e
2. Develop monitoring plan	15	$0	1	15	0	0	0	0	$0	$0	0	a
3. Prepare gypsum stack management plan	20	$0	1	20	0	0	0	0	$0	$0	0	a
Reporting Subtotal						230	23	12	$21,735	$834,800	8	
4. Recordkeeping Requirements												
A. Read Instructions	Inc. in 3A											
B. Implements Activities	NA											
C. Develop Record System	NA											
D. Record information												
1. Records of Hg testing	3	$0	1	3	7	21	2	1	$1,985	$0	0	
2. Records of HF testing	3	$0	1	3	8	24	2	1	$2,268	$0	0	
3. Records of Hg control device	10	$0	1	10	1	10	1	1	$945	$0	0	f
E. Personnel Training	Inc. in 3B											
F. Time for Audits	NA											
Recordkeeping Subtotal						55	6	3	$5,198	$0	0	
TOTAL						285	29	14	$26,933	$834,800	8	

	Total Hours	Labor	Non-Labor	Total
Summary of Respondent Burden	328	$26,933	$834,800	$861,733
Initial Capital and Startup			$0	
Annualized Capital/Start-up and O & M			$834,800	

Footnotes:

(a) Only applicable to first year.

(b) Must perform annual Hg testing, plus semi-annual testing on one representative carbon adsorber system (there are six phosphate rock calciners).

(c) Must perform annual HF testing. For 78 emission points, the incremental cost for using Method 320 versus 13B are included ($8,000). There are 8 emission points (oxidation reactors, defluorination units, and clarifiers) that are currently not tested, but are applicable as noted in the subpart AA clarifications (they would incur the full Method 320 cost of $15,000).

(d) Facilities must follow performance evaluation criteria (calibrations) for control devices. There are 23 process units at the 13 facilities, 12 phosphoric acid units and 11 phophate fertilizer units.

(e) Includes additional data submitted for Hg and HF, for emission points not currently tested. The facilities' emission points that currently conduct TF tests are not considered, as they must already report their data.

(f) One facility will install a carbon adsorption system and must determine the carbon bed life.

(g) Facilities will perform HF tests instead of TF tests from year 2 forward.

Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Phosphoric Acid and Phosphate Fertilizers NESHAP

Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Costs	Non-Labor (Annualized Capital/Startup and O&M) Costs	Total Costs
1	1,219	122	61	1,402	$115,198	$90,800	$205,998
2	174	17	9	200	$16,443	$790,000	$806,443
3	285	29	14	328	$26,933	$834,800	$861,733
Total	1,678	168	84	1,930	$158,574	$1,715,600	$1,874,174
Average	559	56	28	643	$52,858	$571,867	$624,725

Year	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours	Hours per Response
1	42	1,374	28	1,402	33
2	7	173	28	200	29
3	8	265	63	328	41
Total	57	1,811	118	1,930	34
Average	19	604	39	643	34