

Table 5 - Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements for the Phosphoric Acid and Phosphate Fertilizers NESHAP - Year 1

Burden Item	(A) Number of Occurrences Per Year	(B) EPA Hours Per Occurrence	(C) Tech Hours Per Year (C=A x B)	(D) Management Hours Per Year (D = C x 0.05)	(E) Clerical Hours Per Year (E = C x 0.1)	(F) EPA Cost Per Year	Footnotes
1. Applications	not applicable						
2. Read and Understand Rule Requirements	10	20	200	10	20	\$10,364	a
3. Required Activities							
A. Observe stack tests	2	16	32	2	3	\$1,658	b
B. Excess emissions -- Enforcement Activities	1	24	24	1	2	\$1,244	c
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews							
1. Review performance test report	7	5	35	2	4	\$1,814	d
2. Review monitoring plan	23	10	230	12	23	\$11,919	
3. Review gypsum stack and cooling pond management	12	8	96	5	10	\$4,975	
F. Prepare annual summary report	1	10	10	1	1	\$518	e
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =				\$881	per trip	\$1,763	
TOTAL			627	31	63	\$34,255	

Footnotes:

- a Number of occurrences is the number of states where affected sources will exist and each EPA Region (6 states + 4 EPA regions = 10 respondents).
- b Assumes EPA personnel attend 20 percent of the stack tests; only considers facilities with new emission points.
- c Assume 10 percent of the facilities will exceed emissions; only considers facilities with new emission points.
- d Estimate based on only the hours to review new requirements.
- e Estimate based on only the hours to add additional information.

Table 6 - Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements for the Phosphoric Acid and Phosphate Fertilizers NESHAP - Year 2

Burden Item	(A) Number of Occurrences Per Year	(B) EPA Hours Per Occurrence	(C) Tech Hours Per Year (C=A x B)	(D) Management Hours Per Year (D = C x 0.05)	(E) Clerical Hours Per Year (E = C x 0.1)	(F) EPA Cost Per Year	Footnotes
1. Applications	not applicable						
2. Read and Understand Rule Requirements	0	20	0	0	0	\$0	a
3. Required Activities							
A. Observe stack tests	2	16	32	2	3	\$1,658	b
B. Excess emissions -- Enforcement Activities	1	24	24	1	2	\$1,244	c
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews							
1. Review performance test report	7	5	35	2	4	\$1,814	d
2. Review monitoring plan	0	7	0	0	0	\$0	
3. Review gypsum stack and cooling pond management	0	5	0	0	0	\$0	
F. Prepare annual summary report	1	10	10	1	1	\$518	e
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =				\$881	per trip	\$1,763	
TOTAL			101	5	10	\$6,997	

Footnotes:

- a Number of occurrences is the number of states where affected sources will exist and each EPA Region (6 states + 4 EPA regions = 10 respondents).
- b Assumes EPA personnel attend 20 percent of the stack tests; only considers facilities with new emission points.
- c Assume 10 percent of the facilities will exceed emissions; only considers facilities with new emission points.
- d Estimate based on only the hours to review new requirements.
- e Estimate based on only the hours to add additional information.

Table 7 - Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements for the Phosphoric Acid and Phosphate Fertilizers NESHAP - Year 3

Burden Item	(A) Number of Occurrences Per Year	(B) EPA Hours Per Occurrence	(C) Tech Hours Per Year (C=A x B)	(D) Management Hours Per Year (D = C x 0.05)	(E) Clerical Hours Per Year (E = C x 0.1)	(F) EPA Cost Per Year	Footnotes
1. Applications	not applicable						
2. Read and Understand Rule Requirements	0	20	0	0	0	\$0	a
3. Required Activities							
A. Observe stack tests	3	16	48	2	5	\$2,487	b
B. Excess emissions -- Enforcement Activities	1	24	24	1	2	\$1,244	c
C. Create Information	not applicable						
D. Gather Information	not applicable						
E. Report Reviews							
1. Review performance test report	8	5	40	2	4	\$2,073	d
2. Review monitoring plan	0	7	0	0	0	\$0	
3. Review gypsum stack and cooling pond management	0	5	0	0	0	\$0	
F. Prepare annual summary report	1	10	10	1	1	\$518	e
4. Travel expenses: (1 person * 30 hours per year / 8 hours per day * \$75 per diem) + (\$600 per round trip) =				\$881	per trip	\$2,644	
TOTAL			122	6	12	\$8,966	

Footnotes:

- a Number of occurrences is the number of states where affected sources will exist and each EPA Region (6 states + 4 EPA regions = 10 respondents).
- b Assumes EPA personnel attend 20 percent of the stack tests; only considers facilities with new emission points.
- c Assume 10 percent of the facilities will exceed emissions; only considers facilities with new emission points.
- d Estimate based on only the hours to review new requirements.
- e Estimate based on only the hours to add additional information.

Table 8 - Summary of Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements for the Phosphoric Acid and Phosphate Fertilizers NESHAP

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs	Total Costs
1	627	31	63	721	\$34,255	\$0	\$34,255
2	101	5	10	116	\$6,997	\$0	\$6,997
3	122	6	12	140	\$8,966	\$0	\$8,966
Total	850	43	85	978	\$50,218	\$0	\$50,218
Average	283	14	28	326	\$16,739	\$0	\$16,739