

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Nitric Acid Plants for which Construction, Reconstruction or Modification
Commenced after October 14, 2011 (40 CFR Part 60, Subpart Ga) (Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Nitric Acid Plants for which Construction, Reconstruction or Modification Commenced after October 14, 2011 (40 CFR Part 60, Subpart Ga) (Renewal), EPA ICR Number 2445.03, OMB Control Number 2060-0674.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Nitric Acid Plants for which Construction, Reconstruction or Modification Commenced after October 14, 2011 (40 CFR Part 60, Subpart Ga) were proposed on October 14, 2011, and promulgated on August 14, 2012. These regulations apply to new nitric acid production units (NAPUs) that produce weak nitric acid by either the pressure or atmospheric pressure process. Nitrogen oxide (NO_x) is the pollutant regulated under this subpart. These standards limit nitrogen oxides, expressed as nitrogen dioxide (NO₂), to 0.50 lb per ton of 100 percent nitric acid produced. This information is being collected to assure compliance with 40 CFR Part 60, Subpart Ga.

In general, all NSPS standards require initial notification reports, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NSPS.

Any owner/operator subject to the provisions of this part shall 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. 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 U.S. Environmental Protection Agency (EPA) regional office.

Potential respondents are owners or operators of nitric acid production units constructed, modified, or reconstructed after October 14, 2011. The “burden” to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Nitric Acid Plants for which Construction, Reconstruction or Modification Commenced after October 14, 2011 (40 CFR Part 60, Subpart Ga) (Renewal). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and can be found below in Table 2: Average Annual EPA Burden and Cost – NSPS for Nitric Acid Plants for which Construction, Reconstruction or Modification Commenced after October 14, 2011 (40 CFR Part 60, Subpart Ga) (Renewal).

During rule development, we estimated that 5 newly-constructed nitric acid production units and 1 modified unit will become subject to the regulation in the five-year period after the rule effective date (1.2 new sources per year). Over the next three years, we estimate that 6 units per year will be subject to these standards, and 1.2 additional units per year will become subject to these standards. Plants can have more than one nitric acid production unit onsite.

The Office of Management and Budget OMB approved the currently-active Information Collection Requirements (ICR) without any “Terms of Clearance”.

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)(1).

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 addition, section 114(a) states that the Administrator may require any owner/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, NO_x emissions from nitric acid plants cause 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 Ga.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. For our analysis of these standards, we assume sources will rely on the reduction of NO_x by using Selective Catalytic Reduction (SCR).

The notifications required in the standard 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 check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the standards are being met. The performance test may also be observed.

The required noncompliance and malfunction reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

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

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 its 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, duplication does not exist.

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 (79 FR 30117) on May 27, 2014. One comment was received on the burden published in the Federal Register, and it is addressed in section 3(c) below.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is Enforcement and Compliance History Online (ECHO), which is operated and maintained by EPA's Office of Compliance. ECHO is EPA's database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both The Fertilizer Institute (TFI), at (202) 515-2701, and the American Chemistry Council, at (202) 249-7000. The EPA did not receive any comments from the consultations.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. The EPA received one comment in response to the first Federal Register notice, but the comment did not contain any substantive recommendations and did not result in changes to this ICR.

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 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 proper 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 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

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

questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are nitric acid plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2873, Nitrogenous Fertilizers, which corresponds to the North American Industry Classification System (NAICS) code 325311 for Nitrogenous Fertilizer Manufacturing.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Nitric Acid Plants for which Construction, Reconstruction or Modification Commenced after October 14, 2011 (40 CFR Part 60, Subpart Ga).

A source must make the following reports:

Notifications	
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)

Reports	
Initial and subsequent performance test results.	60.8(a), 60.77a(a)
Compliance status.	60.7(a)(7)
A report of noncompliance, including the time period, NO _x emission rates, reasons for noncompliance with the emission standard and a description of corrective actions taken.	60.77a(b)
A report summarizing times when the pollutant concentration or volumetric flow rate exceeds the high value of the monitoring	60.77a(c)

Reports	
equipment.	
Report of any modifications to CERMS which could affect the ability of the CERMS to comply with applicable performance specifications.	60.77a(d)
Initial performance test.	60.8(d), 60.73a(e)
Compliance status.	60.7(a)(7)

A source must keep the following records:

Recordkeeping	
For the NO _x emissions rate, results of the performance evaluations of the CEMs.	60.76a(a)
Daily production rate of nitric acid.	60.76a(b)(2)
30 operating day average NO _x emissions rate values	60.76a(b)(3)
Times of noncompliance with the emissions standards and when pollutant concentrations or flow rates exceed the full span of the monitoring equipment.	60.76a(c)
Reasons for periods of noncompliance and description of corrective actions taken.	60.76a(d)
Records of modifications to CEMS which could affect the ability of the CEMS to comply with performance specifications.	60.76a(e)
The occurrence and duration of malfunctions of operation or of the pollution control and monitoring equipment. Description of actions taken to minimize emissions during periods of malfunction and correction actions to restore normal operation.	60.76a(f)
Records are required to be retained for two (2) years.	60.7(f)
Records of ongoing monitoring.	60.7(f)

Electronic Reporting

Some of the respondents are using 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.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate Continuous Emissions Rate Monitoring Systems (CERMS), which include NO _x concentration and gas flow rate monitors
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.
Train personnel on CERMS operation and maintenance.

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.
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 Integrated Compliance Information System (ICIS) and ECHO.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could 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 reported by state and local governments in the ICIS Air database which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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/operator for two years.

5(c) Small Entity Flexibility

Most, if not all, of the anticipated new sources will be large entities (e.g., large businesses). However, the impact on potential small entities (i.e., small business) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operation 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 the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger business 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 Nitric Acid Plants for which Construction, Reconstruction or Modification Commenced after October 14, 2011 (40 CFR Part 60, Subpart Ga) (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 burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

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 1,370 (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	\$129.93 (\$61.87 + 110%)
Technical	\$103.97 (\$49.51 + 110%)
Clerical	\$51.79 (\$24.66 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2014, "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 type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) 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)
NOX CERMS and flow meter	\$136,174	1.2	\$163,409	\$9,787	6	\$58,720
Initial CERMS testing	\$15,019	1.2	\$18,023			
Initial flow meter testing	\$6,229	1.2	\$7,475			
File cabinet ¹				\$43	6	\$258
TOTAL (Rounded)			\$189,000			\$59,000

¹ Included as O&M because the cost is annualized using a 7 percent interest rate and a 15-year life (i.e., CRF of 0.1098).
Note: Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are \$189,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$59,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$248,000. These are the costs of recordkeeping.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. 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 \$2,320.

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

Managerial	\$62.90 (GS-13, Step 5, \$39.31 + 60%)
Technical	\$46.67 (GS-12, Step 1, \$29.17 + 60%)
Clerical	\$25.25 (GS-6, Step 3, \$15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2014 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 and Cost – NSPS for Nitric Acid Plants for which Construction, Reconstruction or Modification Commenced after October 14, 2011 (40 CFR Part 60, Subpart Ga) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 4.8 existing respondents will be subject to the standard. It is estimated that an additional 1.2 respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 6 per year.

The number of respondents is calculated using the following table that 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 ¹	(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	1.2	3.6	0	0	4.8
2	1.2	4.8	0	0	6
3	1.2	6	0	0	7.2
Average	1.2	4.8	0	0	6

¹ New respondents include sources with constructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 6.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(B \times C)+D$
Notification of construction / reconstruction	1.2	1	0	1.2
Notification of actual startup	1.2	1	0	1.2
Notification of physical or operational change	1.2	1	0	1.2
Notification of CERMS demonstration	1.2	1	0	1.2
Notification of initial performance test	1.2	1	0	1.2
Report of performance test	1.2	1	0	1.2
NOx noncompliance report	0.6	1	0	0.6
			Total	7.8

The number of Total Annual Responses is 8 (rounded).

The total annual labor costs are \$138,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Nitric Acid Plants for which Construction, Reconstruction or Modification Commenced after October 14, 2011 (40 CFR Part 60, Subpart Ga) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 1,370 hours, at a cost of \$138,000 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Nitric Acid Plants for which Construction, Reconstruction or Modification Commenced after October 14, 2011 (40 CFR Part 60, Subpart Ga) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties

of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 170 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$248,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 50 labor hours at a cost of \$2,320. See Table 2: Average Annual EPA Burden and Cost – NSPS for Nitric Acid Plants for which Construction, Reconstruction or Modification Commenced after October 14, 2011 (40 CFR Part 60, Subpart Ga) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

6(f) Reasons for Change in Burden

There is an adjustment increase in the respondent and Agency burden due to an increase in the estimated number of sources. Our research during the rule development indicated an average of 1.2 new sources per year will become subject to the rule. We assume the industry will continue to grow linearly at this rate. This also results in an increase in annual O&M costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 170 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-2014-0103. 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), WJC 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) 566-1752. 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-OECA-2014-0103 and OMB Control Number 2060-0674 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 Nitric Acid Plants for which Construction, Reconstruction or Modification Commenced after October 14, 2011 (40 CFR Part 60, Subpart Ga) (Renewal)

Item	(A) Hours per Occurrence	(B) Occurrences/ Respondent- Yr	(C) Hours/ Respondent- Yr (AxB)	(D) Respondents / Year	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)	(G) Clerical Hours/Year (E x 0.10)	(F) Cost/ Year
1. APPLICATIONS	N/A							
2. SURVEY AND STUDIES	N/A							
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS	N/A							
4. REPORT REQUIREMENTS								
A. Familiarization with the regulatory requirements								
All Sources	1	1	1	6	6	0.3	0.6	\$693.87
B. Required Activities								
New Sources - Initial Performance Test	180	1	180	1.2	216	10.8	21.6	\$24,979.43
New Sources – Demonstration of CERMS	180	1	180	1.2	216	10.8	21.6	\$24,979.43
New Sources - Daily monitoring (CERMS)	0.5	330	165	1.2	198	9.9	19.8	\$22,897.81
C. Create Information (Included in 4B)								
D. Gather Existing Information (Included in 4E)								
E. Write Report								
New Sources - Notification of construction/reconstruction	2	1	2	1.2	2.4	0.12	0.24	\$277.55
New Sources - Notification of actual startup	2	1	2	1.2	2.4	0.12	0.24	\$277.55
New Sources - Physical or operational change	2	1	2	1.2	2.4	0.12	0.24	\$277.55
New Sources - Notification of demonstration of CERMS	2	1	2	1.2	2.4	0.12	0.24	\$277.55

New Sources - Notification of initial performance test	2	1	2	1.2	2.4	0.12	0.24	\$277.55
New Sources - Report of performance test	2	1	2	1.2	2.4	0.12	0.24	\$277.55
NOx Noncompliance report	2	1	2	0.6	1.2	0.06	0.12	\$138.77
Subtotal for Reporting						749		\$75,355
5. RECORDKEEPING REQUIREMENTS								
A. Read Instructions (Included in 4A)								
B. Plan Activities (Included in 4B)								
C. Implement Activities (Included in 4B)								
D. Record Data (Not Applicable)								
Record of noncompliance	0.5	1	0.5	6	3	0.15	0.3	\$346.94
E. Time to Transmit or Disclose Information								
Daily production and flow rates	8	1	8	6	48	2.4	4.8	\$5,550.98
Data collection	0.125	330	41.25	6	247.5	12.375	24.75	\$28,622.26
Records of startups, shutdowns, malfunctions, etc	8	1	8	6	48	2.4	4.8	\$5,550.98
F. Time to Train Personnel								
Train Personnel for CERMS maintenance	16	2	32	6	192	9.6	19.2	\$22,203.94
G. Time for Audits (Not Applicable)								
Subtotal for Recordkeeping						619		\$62,275.10
TOTAL ANNUAL LABOR BURDEN AND COST (Rounded)						1,370		\$138,000
Capital and O&M								\$248,000
TOTAL COSTS								\$386,000

Note: Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NSPS for Nitric Acid Plants for which Construction, Reconstruction or Modification Commenced after October 14, 2011 (40 CFR Part 60, Subpart Ga) (Renewal)

Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Plant/Year	(C) EPA Hours/ Plant/Year (A x B)	(D) Plants/ Year	(E) EPA Technical Hours/ Year (C x D)	(F) EPA Managerial Hours/Year	(G) EPA Clerical Hours/Year	(H) Cost, \$
Observe Initial Performance Tests	24	1	24	1.2	28.8	1.44	2.88	\$1,507
Notification of construction/reconstruction commencement	2	1	2	1.2	2.4	0.12	0.24	\$126
Notification of actual startup	0.5	1	0.5	1.2	0.6	0.03	0.06	\$31
Notification of performance test	0.5	1	0.5	1.2	0.6	0.03	0.06	\$31
Review Test Results	8	1	8	1.2	9.6	0.48	0.10	\$481
Review NOX noncompliance reports	8	1	8	0.36	2.88	0.144	0.03	\$144
Total Annual Hours (Rounded)						50		\$2,320

Note: Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.