

Table 1: Annual Respondent Burden and Cost – NESHAP for Hydrochloric Acid Production (

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
A. Familiarize with rule requirements ^c	4	1	4	87
B. Gather information ^c	4	1	4	2
C. Write reports				
Initial notification ^c	2	1	2	0
Application for construction ^c	2	1	2	2
Notification of intent to conduct performance test	2	1	2	2
Notification of compliance status ^c	19.5	1	19.5	2
First compliance report ^{c, d}	8.5	1	8.5	2
Semiannual compliance report ^e	4.5	2	9	85
Subsequent performance test reports ^f	4	1	4	0
Startup, shutdown, malfunction report ^g	2	10	20	2
Subtotal for Reporting Requirements				
4. Recordkeeping Requirements				
A. Plan activities ^{c, h}	10	1	10	2
B. Implement activities				
Record startups, shutdown, malfunctions ⁱ	1	100	100	87
Conduct performance test	48.5	1	48.5	87
Record CPMS measurements ^j	1	365	365	87
CMPS calibration and maintenance ^k	3.9	50	195	87
Check for and repair leaks ^l	1	365	365	87
C. Develop record system				
Startup, shutdown, malfunction plan ^c	40	1	40	2
Site-specific monitoring plan ^c	20	1	20	2
Site-specific test plan ^c	20	1	20	2
Leak detection and repair plan ^c	40	1	40	2
D. Time to train personnel			0	
CPMS acquisition and installation ^c	20	1	20	2
CPMS inspection and monitoring ^c	4	1	4	2
E. Store, file, and maintain records ^m	20	1	20	87
F. Retrieve records/reports ⁿ	20	1	20	87

Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded)				
Capital and O&M Cost				
Grand TOTAL				

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 87. There will be 87 respondents that will become subject to the rule over the three-year period of this ICR.
- ^b This ICR uses the following labor rates: \$123.93 per hour for Executive, Administrative, and Managerial labor; \$105.79 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, “Occupational and Industry Group, by Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The rates do not account for the benefit packages available to those employed by private industry.
- ^c This is a one-time only activity for each facility and only sources that started up prior to April 17, 2003 are required to prepare a compliance report.
- ^d We have assumed that two new respondents will prepare the first compliance report.
- ^e We have assumed that it will take each respondent 4.5 hours two times per-year to prepare the semiannual compliance report.
- ^f We have assumed that some facilities will take 4 hours to perform tests after the initial compliance determination, but will take 8 hours by significantly increasing its production.
- ^g We have assumed that it will take each new respondents two hours ten times a year to prepare a SSM report.
- ^h We have assumed that it will take each respondent 10 hours to record plan activities.
- ⁱ We have assumed that each respondent will have to implement SSM activities 100 times per-year.
- ^j We have assumed that respondents will have to record CPMS measurements 365 time per year.
- ^k We have assumed that respondents will have to implement CMPS calibration and maintenance activities 50 times per year.
- ^l We have assumed that respondent are required to check for and repair leaks 365 times per-year.
- ^m We have assumed that each respondent will take 20 hours once per-year to store, file and maintain records.
- ⁿ We have assumed that it will take respondent 20 hours to retrieve records/reports once per-year.

40 CFR Part 63, Subpart NNNNN (Renewal)

103.97

123.93

51.79

(E) Technical Person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, \$^b
348	17.4	34.8	\$40,140.23
8	0.4	0.8	\$922.76
0	0	0	\$0.00
4	0.2	0.4	\$461.38
4	0.2	0.4	\$461.38
39	1.95	3.9	\$4,498.47
17	0.85	1.7	\$1,960.87
765	38.25	76.5	\$88,239.31
0	0	0	\$0.00
40	2	4	\$4,613.82
1409			\$141,298
20	1	2	\$2,306.91
8,700	435	870	\$1,003,505.85
4,219.5	210.98	421.95	\$486,700.34
31,755	1,587.75	3,175.5	\$3,662,796.35
16,965	848.25	1,696.5	\$1,956,836.41
31,755	1,587.75	3,175.5	\$3,662,796.35
80	4	8	\$9,227.64
40	2	4	\$4,613.82
40	2	4	\$4,613.82
80	4	8	\$9,227.64
	0	0	\$0.00
40	2	4	\$4,613.82
8	0.4	0.8	\$922.76
1,740	87	174	\$200,701.17
1,740	87	174	\$200,701.17

111,760			\$11,209,564
113,000			\$11,400,000
			\$754,000
			\$12,200,000

two additional new sources per year that

13.97 per hour for Technical labor, and

statistics, June 2014, "Table 2.

rates have been increased by 110% to

to submit initial notification

ice report.

by either bringing a new product on line or

er year.

571 hr/resp

Table 2: Average Annual EPA Burden and Cost – NESHAP for Hydrochloric Acid Production

46.67

Activity	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical Person-hours per year (E=CxD)
Review initial notification ^c	4	1	4	0	0
Review application for construction ^c	4	1	4	2	8
Review notification of intent to conduct test ^d	4	1	4	2	8
Review notification of compliance status ^c	20	1	20	2	40
Review compliance report ^e	20	2	40	2	80
Review subsequent performance test report ^f	10	1	10	0	0
Review startup, shutdown, malfunction report	8	10	80	2	160
Attend performance test	20	1	20	2	40
TOTAL ANNUAL BURDEN AND COST (rounded)					

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 87. There will be 87 respondents that will become subject to the rule over the three-year period of this ICR.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for Managerial rate of \$62.90 (GS-13, Step 5, \$39.31 x 1.6), Technical rate of \$46.67 (GS-12, Step 1, \$29.17 x 1.6), and \$15.78 x 1.6). These rates are from the Office of Personnel Management (OPM) “2014 General Schedule” which ex

^c This is a one-time only activity for each facility.

^d We have assumed that each respondent will take 4 hours to review notification of intent to conduct test.

^e We have assumed that each respondent will take twenty hours to review compliance report twice per year.

^f We have assumed that some facilities will take ten hours to perform tests after the initial compliance determination , or by significantly increasing its production.

^g We have assumed that it will take each new respondents eight hours to review the SSM report. This report will be d

(40 CFR Part 63, Subpart NNNNN) (Renewal)

62.9 25.25

(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$^b
0	0	\$0.00
0.4	0.8	\$418.72
0.4	0.8	\$418.72
2	4	\$2,093.60
4	8	\$4,187.20
0	0	\$0.00
8	16	\$8,374.40
2	4	\$2,093.60
386		\$17,600

wo additional new sources per year that

government overhead expenses:

l Clerical rate of \$25.25 (GS-6, Step 3,
cludes locality rates of pay.

by either brining a new product on line

one.