

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Phosphate Fertilizer Industry (40 CFR Part 60, Subparts T, U, V, W and X)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Phosphate Fertilizer Industry (40 CFR Part 60, Subparts T, U, V, W, and X)
(Renewal), EPA ICR Number 1061.13, OMB Control Number 2060-0037.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Phosphate Fertilizer Industry (40 CFR Part 60 Subparts T, U, V, W, and X) were proposed on October 22, 1974, promulgated on August 6, 1975, and amended on August 19, 2015. These regulations apply to both existing and new facilities that engage in the manufacture of phosphate fertilizers (wet-process phosphoric acid plants, superphosphoric acid plants, diammonium phosphate plants, and triple superphosphate plants), and have a design capacity of more than 15 tons of equivalent phosphorous pentoxide (P_2O_5) feed per calendar day. These standards also apply to new and existing facilities that store granular triple superphosphate. These standards establish fluoride emission limitations as a measure of phosphorus-bearing feed material at affected facilities. The affected facilities may include a combination of reactors, filters, evaporators, hot wells, acid sumps, cooling tanks, granulators, dryers, coolers, screens, mills, mixers, curing belts (dens), coolers, and facilities which store run-of-pile triple superphosphate, depending on the type of plant. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 60, Subpart T, U, V, W, and X.

The August 2015 Phosphoric Acid Manufacturing and Phosphate Fertilizer Production NSPS rule amendments require owners and operators to establish an allowable range for the pressure drop through the process scrubbing system, keep records of the daily average pressure drop through the process scrubbing system, and keep records of deviations. The amendments did not result in any changes to the estimated burden in this ICR, because the requirements only apply to new sources constructed, modified, or reconstructed after November 7, 2014, and there are no projected new sources. In addition, most, if not all, new sources will be exempt from NSPS compliance due to the likelihood of the new source being subject to the NESHAP for Phosphoric Acid Manufacturing (40 CFR Part 63, Subpart AA) or Phosphate Fertilizer Production (40 CFR Part 63, Subpart BB).

In general, all NSPS standards require initial notifications, 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 five 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.

The “burden” to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Phosphate Fertilizer Industry (40 CFR Part 60, Subparts T, U, V, W and X) (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 Phosphate Fertilizer Industry (40 CFR Part 60, Subparts T, U, V, W and X) (Renewal).

Over the next three years, 13 respondents per year will be subject to the standard, and no additional respondents per year will become subject to these same standards.

The Office of Management and Budget (OMB) approved the currently active 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, fluoride emissions from the phosphate fertilizer industry either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subparts T, U, V, W, and X.

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 standards. Continuous emission monitors are used to ensure compliance with the standards at all times.

The notifications required in the standards 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, and the standards are being met. The performance test may also be observed.

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

The standards require recordkeeping to document information relating to the daily feed rate and storage of equivalent P_2O_5 . Amounts of P_2O_5 are determined from continuous monitoring system (CMS) records of phosphate-bearing feed material or accounts for triple superphosphate stored. The standards also limit total fluoride emission to 100 grams per megagram (Mg) of equivalent P_2O_5 feed as measured in Mg/hour. Therefore, the regulations require the hourly recording of data and the maintenance of daily records for purposes of determining the feed rate used in the standard. The information generated by the monitoring and recordkeeping requirements described above is used by the Agency to ensure that facilities affected by the NSPS continue to operate and control equipment used to achieve compliance with the NSPS.

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

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subparts T, U, V, W, and X.

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, no duplication exists.

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 (80 FR 32116) on June 5, 2015. No comments were received on the burden published in the Federal Register.

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 the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade association and other interested parties were provided an opportunity to comment on the burden associated with the standards as they were being developed and the standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) The Fertilizer Institute, at (202) 515-2701; and 2) the Florida Industrial and Phosphate Research Institute (FIPR Institute), at (863) 534-7160. In this case, no comments were received.

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.

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 Part 1320, Section 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 phosphate fertilizer facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2874, which corresponds to the North American Industry Classification System (NAICS) 325312 for Phosphatic 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 Phosphate Fertilizer Industry (40 CFR Part 60, Subparts T, U, V, W, and X).

A source must make the following reports:

Notifications	
Notification of construction/reconstruction.	60.7(a)(1)

Notifications	
Notification of initial startup including compliance method.	60.7(a)(3)
Physical or operational change.	60.7(a)(4)
Demonstration of continuous monitoring system.	60.7(a)(5)

Reports	
Initial performance test results.	60.8(a)
Initial performance test.	60.8(d)
Semiannual or as indicated by the Administrator reports of exceedances or monitoring systems performance.	60.7(c)
Site-specific methodology plan for demonstrating compliance with standards for fluorides.	60.243(d)

A source must keep the following records:

Recordkeeping	
Startups, shutdowns or malfunctions, periods where the continuous monitoring system is inoperative.	60.7(b)
A file with records of all data measured during performance tests to demonstrate compliance with the standard including the equipment operating parameters and records of periods of operations during which the parameters were established. The file shall be retained for at least five years following the date of such measurements, maintenance, reports, and records.	60.7(f), 60.205
Daily record of equivalent P_2O_5 feed rate.	60.203(b), 60.213(b), 60.223(b), 60.233(b), 60.243(b)
Total pressure drop across any process absorber.	60.203(c), 60.205(a), 60.213(c), 60.215(a), 60.223(c), 60.225(a), 60.233(c), 60.235(a), 60.243(c), 60.245(a)
Records of deviations	60.205(b), 60.215(b), 60.225(b), 60.235(b), 60.245(b)

Recordkeeping	
Mass of granular triple superphosphate in storage.	60.243(a)
Other records specified in an EPA approved site-specific plan.	60.243(d)

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 CMS for the total pressure drop across the process absorber.
Install, calibrate, maintain, and operate a flow monitoring device which can be used to determine the mass flow of phosphorus bearing feed material to the process.
As part of the performance test, determine the P ₂ O ₅ content in megagrams per hour (Rp) of the feed, using the Association of Official Analytical Chemists (AOAC) Method 9 and Method 13A or 13b to determine the total fluoride concentration of volumetric flow rate of the effluent gas from each of the emission points.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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
Review notifications and reports, including performance test reports and semiannual reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

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 semiannual reports 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

The majority of the respondents are large entities (i.e. large businesses) as the number of employees at a typical fertilizer plant currently exceeds the criterion for small business. Due to technical considerations involving the process operations 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 businesses 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 Phosphate Fertilizer Industry (40 CFR Part 60, Subparts T, U, V, W and X) (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 each of the subparts 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. Wherever 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 average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 1,390 hours (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 standards 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 monitors 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)
Pressure drop monitor	\$27,720	0	\$ 0	\$24,630	13	\$320,000
TOTAL						\$320,000

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

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$320,000. 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 \$320,000. These are the 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. 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 \$1,360.

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 Phosphate Fertilizer Industry (40 CFR Part 60, Subparts T, U, V, W and X) (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 13 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 13 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	0	13	0	0	13
2	0	13	0	0	13
3	0	13	0	0	13
Average	0	13	0	0	13

¹ New respondents include sources with constructed, reconstructed 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 13.

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

Total Annual Responses				
(A)	(B)	(C)	(D) Number of Existing Respondents That	(E) Total Annual Responses

Total Annual Responses				
Information Collection Activity	Number of Respondents	Number of Responses	Keep Records But Do Not Submit Reports	E=(BxC)+D
Notification of Operational Change	2	1	N/A	2
Semiannual Report	13	2	N/A	26
			Total	28

The number of Total Annual Responses is 28.

The total annual labor costs are \$140,000 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Phosphate Fertilizer Industry (40 CFR Part 60, Subparts T, U, V, W and X) (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 below, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 1,390 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Phosphate Fertilizer Industry (40 CFR Part 60, Subparts T, U, V, W and X) (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 50 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$320,000. 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 30 labor hours at a cost of \$1,360. See below Table 2: Average Annual EPA Burden and Cost – NSPS for Phosphate Fertilizer Industry (40 CFR Part 60, Subparts T, U, V, W and X) (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

The increase in burden from the most-recently approved ICR is due to accounting for the assumption that all sources will spend one hour annually reviewing and understanding the rule requirements. Previously, the assumption was that only new sources would incur this burden.

There is a small decrease in O&M cost in this ICR due to rounding of all calculated values to three significant digits. In addition, there is an increase of two annual responses due to a minor correction. The previous ICR did not account for notifications of operational changes in calculating the number of responses.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 50 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–2012–0533. 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-2012-0533 and OMB Control Number 2060-0037 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 Phosphate Fertilizer Industry (40 CFR Part 60, Subparts T, U, V, W and X) (Renewal)

Burden Item	A	B	C	D	E	F	G	H
	Person Hours Per Occurrence	Number of Occurrences Per Respondent Per Year	Person Hours Per Respondent Per Year (C=AxB)	Respondents Per Year ^a	Technical Person-Hours Per Year (E=CxD)	Management Person Hours Per Year (E x 0.05)	Clerical Person Hours Per Year (E x 0.10)	Total Costs Per Year (\$) ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read and understand rule requirements	1	1	1	13	13	0.65	1.3	\$1,503.39
B. Required activities								
New Sources								
Initial Performance Test								
AOCA Method 9 tests ^c	29.7	1	29.7	0	0	0	0	\$0
Reference Method 13A or 13B tests ^d	4	1	4	0	0	0	0	\$0
Repeat performance test ^e	4	0.2	0.8	0	0	0	0	\$0
C. Create Information	See 3B							
D. Gather existing information	See 3E							
E. Write Report								
New Sources								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Notification of CMS demonstration	2	1	2	0	0	0	0	\$0
Report of initial performance test	See 3B							
Site-specific methodology plan ^f	2	1	2	0	0	0	0	\$0

Burden Item	A	B	C	D	E	F	G	H
	Person Hours Per Occurrence	Number of Occurrences Per Respondent Per Year	Person Hours Per Respondent Per Year (C=AxB)	Respondents Per Year ^a	Technical Person-Hours Per Year (E=CxD)	Management Person Hours Per Year (E x 0.05)	Clerical Person Hours Per Year (E x 0.10)	Total Costs Per Year (\$) ^b
Existing Sources								
Notification of operational change ^g	2	1	2	2	4	0.2	0.4	\$462.58
Semiannual report of exceedances ^h	2	2	4	13	52	2.6	5.2	\$6,013.57
Subtotal Reporting Requirements						79		\$7,980
4. Recordkeeping Requirements								
A. Read and understand rule requirements	See 3A							
B. Plan activities	See 3B							
C. Implement activities	See 3B							
D. Develop record system	N/A							
E. Time to enter information								
Records of operation parameters and emissions ⁱ	0.25	350	87.5	13	1137.5	56.88	113.75	\$131,546.76
Subtotal Recordkeeping Requirements						1,308		\$131,547
TOTAL LABOR BURDEN AND COST (rounded)^j						1,390		\$140,000
Total Capital/O&M Costs (rounded)^j								\$320,000
Grand Total (Labor and Capital/O&M Costs)(rounded)^j								\$460,000

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 13. There will be no additional new sources that will become subject to the rule over the three-year period of this ICR.

^b This ICR uses the following labor rates: Technical \$103.97 (\$49.51 + 110%); Managerial \$129.93 (\$61.87+ 110%); and 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. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

- ^c As specified in the general provisions, each performance test shall consist of three separate runs using the applicable test method. Sources are required to use the spectrophotometric molybdovanadophosphate method (AOAC) Method 9 published in the 11 Edition of the Official Methods of Analysis of the Association of Official Analytical Chemists dated 1970, to determine the P₂O₅ feed rate.
- ^d As specified in the general provisions, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specific in the applicable rule. For these rules, the total fluoride concentration and volumetric flow rate of the effluent gas shall be determined by Method 13 which requires a sampling time and a sample volume for each run of at least 60 minutes and 0.85 dscm (30 dscf).
- ^e We assume that 20 percent of initial performance tests must be repeated due to failure.
- ^f Only sources that have a granular triple superphosphate storage facility are required to submit this initial plan.
- ^g We assume that 15 percent of the source would be attributed to operational changes.
- ^h We assume that each source will submit a semiannual report due to excess emission and monitoring systems performance over the three-year period.
- ⁱ Sources are required to maintain a daily record of operating parameters (e.g., determine equivalent P₂O₅ content and total pressure drop across the scrubbing system). We assume that the operation is 350 days per year as specified in the NSPS review document.
- ^j Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NSPS for Phosphate Fertilizer Industry (40 CFR Part 60, Subparts T, U, V, W and X) (Renewal)

Burden Item	A	B	C	D	E	F	G	H
	EPA Hours per Occurrence	Number of Occurrences Per Year	EPA Person Hours Per Year (A x B)	Plants Per Year ^a	Technical Hours Per Year (C x D)	Management Hours Per Year (E x 0.05)	Clerical Hours Per Year (E x 0.10)	Total Cost Per Year (\$) ^b
Report Review								
New Plants								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of initial startup	0.5	1	0.5	0	0	0	0	\$0
Notification of actual startup	0.5	1	0.5	0	0	0	0	\$0
Notification of initial test	0.5	1.2	0.6	0	0	0	0	\$0
Review test results	8	1.2	9.6	0	0	0	0	\$0
Notification of CMS demonstration	0.5	1	0.5	0	0	0	0	\$0
Existing Plants								
Semiannual report ^c	1	2	2	13	26	1.3	2.6	\$1,360.84
TOTAL ANNUAL BURDEN AND COST (rounded)^d						30		\$1,360

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 13. There will be no additional new sources that will become subject to the rule over the three-year period of this ICR.

^b This cost is based on the average hourly labor rate as follows: Technical \$46.67 (GS-12, Step 1, \$29.17 + 60%); Managerial \$62.90 (GS-13, Step 5, \$39.31 + 60%); and Clerical \$25.25 (GS-6, Step 3, \$15.78 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the 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.

^c We have assumed that each plant will take one hour twice per year to review semiannual report.

^dTotals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.