

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Grain Elevators (40 CFR Part 60, Subpart DD) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NSPS for Grain Elevators (40 CFR Part 60, Subpart DD) (Renewal),  
EPA ICR Number 1130.11, OMB Control Number 2060-0082.

**1(b) Short Characterization/Abstract**

The New Source Performance Standards (NSPS) for Grain Elevators (40 CFR Part 60, Subpart DD) were proposed on January 18, 1977, promulgated on August 3, 1978, and amended on October 17, 2000 (65 *FR* 61759). These regulations apply to the following facilities in grain elevators: each truck unloading station, truck loading station, railcar unloading station, railcar loading station, grain dryer, and all grain handling operations commencing construction, modification or reconstruction after August 3, 1978. This information is being collected to assure compliance with 40 CFR Part 60, Subpart DD. On July 9, 2014, EPA proposed to amend the NSPS for Grain Elevators; the proposed changes will be addressed in a new subpart DDa and covered under a separate ICR.

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 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.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 200 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standard. This estimate is based on the Agency's estimate from a previous ICR renewal.

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (ICR) with the following Terms of Clearance (TOC):

Before this ICR is renewed, the agency should update the universe and burden estimates.

The Agency addressed the TOC by consulting with industry trade associations to verify the current number of facilities and industry growth rate. In addition, the ICR burden estimates has been updated to reflect the latest labor rates.

All of the grain elevators in the United States are owned and operated by the grain elevators industry (the “Affected Public”), which is a privately-owned, for-profit business industry. None of these facilities in the United States are owned by either state, local, tribal or the Federal government. The “burden” to the Affected Public is listed below in Table 1: Annual Respondent Burden and Cost – NSPS for Grain Elevators (40 CFR Part 60, Subpart DD) (Renewal). The Federal government’s “burden” associated with the review of reports submitted by the respondent is shown below in Table 2: Average Annual EPA Burden and Cost– NSPS for Grain Elevators (40 CFR Part 60, Subpart DD) (Renewal).

## **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 eight 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, particulate matter emissions from grain elevators facilities 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, Subpart DD.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in the 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. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

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, that leaks are being detected and repaired, and the standard is being met. The performance test may also be observed.

The required annual summary 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**

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart DD.

### **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 (80 FR 32120) 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 associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the National Grain and Feed Association (NGFA), at (202)289-0873; and the Grain Elevator and Processing Society, at (763) 999-4300. NGFA responded in September 2015 on behalf of a coalition of national trade associations for which it serves as chair, i.e., the NSPS Subpart DD Coalition, which includes the Corn Refiners Association, National Council of Farmer Cooperatives, National Grain and Feed Association, National Oilseed Processors Association, North American Millers' Association and USA Rice Federation.

The Coalition agreed with the Agency's estimate of zero growth over the three-year period of this ICR, and stated that it has no information to confirm the estimate of 200 respondents. Further, the Coalition noted that the current ICR indicates an "annual summary report" is required under 40 CFR Section 60.7(d), however, Subpart DD itself does not actually require continuous monitoring. In this ICR, we have removed the "annual summary report" line item to accurately reflect the regulatory requirement.

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 grain elevators. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, and the corresponding North American Industry Classification System (NAICS) codes, are listed below.

<b>Standard (40 CFR, Part 60, Subpart DD)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Farm Product Warehouse and Storage	4221	493130
Grain and Field Beans (Agents and Brokers)	5153	425120
Grain and Field Beans (Business to Business Electronic Markets)	5153	425110

### **4(b) Information Requested**

#### **(i) Data Items**

In this ICR, all the data that is recorded or reported is required by the NSPS for Grain Elevators (40 CFR Part 60, Subpart DD).

A source must make the following reports:

<b>Notifications</b>	
Notification of construction or reconstruction	60.7(a)(1)
Notification of actual startup	60.7(a)(3)
Notification of initial performance test	60.8(d)
Initial performance test results	60.8(a)
Repeat performance tests	60.7(a)(4)

A source must keep the following records:

<b>Recordkeeping</b>	
Startup, shutdown, or malfunction period where the continuous monitoring system is inoperative	60.7(b)
Records are required to be retained for two years and kept onsite	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**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Perform initial performance test, Reference Method 2, 5, 7, and 9, and repeat performance test if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.

<b>Respondent Activities</b>
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.
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.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., continuous parameter monitoring system). Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

## **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.

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests if necessary.
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 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 and note the operating conditions under which compliance was achieved. 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**

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. 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 to be the minimum requirements 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 Grain Elevators (40 CFR Part 60, Subpart DD) (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.

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 record-keeping and reporting requirements is estimated to be 460 hours (Total Labor Hours from Table 1 below). 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 only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are neither capital/startup nor operation and maintenance costs.

#### **(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs**

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance 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 \$0.

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 Grain Elevators (40 CFR Part 60, Subpart DD) (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 200 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 200 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(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	0	200	0	200
2	0	0	200	0	200
3	0	0	200	0	200
Average	0	0	200	0	200

<sup>1</sup> 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 200.

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

<b>Total Annual Responses</b>				
(A)	(B)	(C)	(D)	(E)

<b>Total Annual Responses</b>				
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of initial performance test	0	1	0	0
Report of performance tests results	0	1.2	0	0
Records of SSM	0	0	200	200
			Total	200

The number of Total Annual Responses is 200.

The total annual labor costs are \$46,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Grain Elevators (40 CFR Part 60, Subpart DD) (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 460 hours. Details regarding these estimates may be found below in Table 1. Annual Respondent Burden and Cost – NSPS for Grain Elevators (40 CFR Part 60, Subpart DD) (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 2 hours per response.

There are no capital/startup or operation and maintenance costs.

#### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 0 labor hours at a cost of \$0. See Table 2: Average Annual EPA Burden and Cost – NSPS for Grain Elevators (40 CFR Part 60, Subpart DD) (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 a decrease in the respondent and Agency burden in this ICR compared to the previous ICR. This is not due to program changes. The burden and cost decrease because we corrected the burden estimates by removing the annual summary report line item to more accurately reflect the Subpart DD regulatory requirements. The current Subpart DD NSPS does not impose any ongoing monitoring or reporting requirement.

#### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 2 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-2011-0239. 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-2011-0239 and OMB Control Number 2060-0082 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 Grain Elevators (40 CFR Part 60, Subpart DD) (Renewal)**

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year	Respondents per year <sup>a</sup>	Technical person-hours per year	Management person hours per year	Clerical person hours per year	Total Cost per year <sup>b</sup>
			(C=AxB)		(E=CxD)	(Ex0.05)	(Ex0.1)	
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read and understand rule requirement	1	1	1	200	200	10	20	\$23,129
B. Required activities								
Initial performance tests <sup>c</sup>	28	1	28	0	0	0	0	\$0
Repeat performance tests <sup>d</sup>	28	0.2	5.6	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
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 results	2	1	2	0	0	0	0	\$0
Notification of repeat performance test results	See 3B							
Report of performance test results	8	1.2	9.6	0	0	0	0	\$0
Annual summary report <sup>e</sup>	8	1	8	0	0	0	0	\$0
<b>Subtotal for Reporting Requirements</b>						<b>230</b>		<b>\$23,129</b>

4. Recordkeeping requirements								
A. Read and understand rule requirement	See 3A							
B. Plan activities	See 3B							
C. Implement Activities	See 3B							
D. Develop record system	N/A							
E. Time to enter and transmit information								
Records of startup, shutdown, malfunction <sup>f</sup>	1	1	1	200	200	10	20	\$23,129
F. Time to train personnel	N/A							
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>230</b>		<b>\$23,129</b>
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>g</sup></b>						<b>460</b>		<b>\$46,000</b>
Capital and O&M Cost								\$0
<b>GRAND TOTAL</b>								<b>\$46,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 200 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years.

<sup>b</sup> This ICR uses the following labor rates: \$129.93 per hour for Executive, Administrative, and Managerial labor; \$103.97 per hour for Technical labor, and \$51.79 per hour for Clerical labor. 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.

<sup>c</sup> We have assumed that it will take twenty-eight hours for each new respondent to perform the initial performance test.

<sup>d</sup> We have assumed that 20 percent of respondents would repeat performance test due to failure.

<sup>e</sup> We have assumed that all respondents will each take eight hours to write the annual summary report.

<sup>f</sup> We have assumed that each respondent will take one hour to record information on startup, shutdown, malfunction.

<sup>g</sup> 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 Grain Elevators (40 CFR Part 60, Subpart DD) (Renewal)**

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrence per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year <sup>a</sup>	(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, \$ <sup>b</sup>
Initial performance tests <sup>c</sup>	24	1	24	0	0	0	0	\$0
Repeat performance test <sup>d</sup>	24	0.2	4.8	0	0	0	0	\$0
Report Review								
Notification of construction	2	1	2	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
Review annual summary report <sup>e</sup>	4	1	4	0	0	0	0	\$0
<b>TOTAL ANNUAL BURDEN AND COST (rounded) <sup>f</sup></b>					<b>0</b>			<b>\$0</b>

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 200 respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years.

<sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.90 for Managerial (GS-13, Step 5, \$39.31 x 1.6), \$46.67 for Technical (GS-12, Step 1, \$29.17 x 1.6) and \$25.25 Clerical (GS-6, Step 3, \$15.78 x 1.6). These rates are from the Office of Personnel Management (OPM) “2014 General Schedule” which excludes locality rates of pay.

<sup>c</sup> We have assumed that it will take twenty-four hours for each new respondent to perform the initial performance test.

<sup>d</sup> We have assumed that 20 percent of respondents would repeat performance test due to failure.

<sup>e</sup> We have assumed that each respondent will take four hours to review the annual summary report.

<sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.