

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (Renewal), EPA ICR Number 1066.08, OMB Control Number 2060-0032.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) were proposed on February 4, 1980, promulgated on November 12, 1980, and amended on October 17, 2000. These regulations apply to ammonium sulfate dryers located at both existing and new ammonium sulfate manufacturing plants in the caprolactam by-product, synthetic, and coke oven by-products sectors of the ammonium sulfate manufacturing industry. 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 PP.

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 retain a file containing these notifications, reports, and records for at least two years following the date of these documents. 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 Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (Renewal). The Federal Government’s “burden” 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 Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (Renewal).

Over the next three years, an average of two respondents will be subject to these standards, and due to the static nature of the industry, it is estimated that no additional respondents per year will become subject to these same standards. The industry is dominated by

facilities that have been operating prior to the proposed date of the rule (February 4, 1980), and there has been either a long-term static or declining market for the product both domestically and globally.

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, particulate matter emissions from the ammonium sulfate manufacturing industry 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 PP.

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. 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 these 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, leaks are being detected and repaired, and the standard is 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.

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

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

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 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 The Fertilizer Institute, (TFI), at (202) 962-0490; and the American Chemical Society (ACS), at (800) 227-5558.

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. In this case, no comments were received.

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 ammonium sulfate manufacturing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 2873, 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 Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP).

A source must make the following reports:

Notifications	
Notification of construction or modification	60.7(a)(1)
Notification of initial startup	60.7(a)(3)
Notification of initial performance test	60.8(d)

Reports	
Semiannual report	60.7(c)

A source must keep the following records:

Recordkeeping	
Initial performance test results	60.8(a)
Startup, shutdowns, and malfunctions	60.8(c)
Control device operating parameters (continuous)	60.423
Records should be retained for two years	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 a flow monitoring device to determine the mass-flow of ammonium sulfate feed material to the process.
Install, calibrate, maintain, and operate CMS for particulate matter (PM) and a CMS for pressure drop across the emission control system.
Perform initial performance test, Reference Methods 9 and 5 tests, and repeat performance tests if necessary.
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

Agency Activities
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. 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

There are no small entities (i.e., small businesses) affected by this regulation. 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 Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (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 recordkeeping and reporting requirements is estimated to be 286 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 only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are no capital/startup or 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 such activities 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 \$1,670.

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 Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (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 two 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 two 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	2	0	0	2
2	0	2	0	0	2
3	0	2	0	0	2
Average	0	2	0	0	2

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 two.

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=(BxC)+D
Semiannual Reports	2	2	0	4
			Total	4

The number of Total Annual Responses is 4.

The total annual labor costs are \$28,700. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (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 286 hours. Details regarding these estimates may be found below in Table 1. Annual Respondent Burden and Cost – NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (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 72 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. 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 37 labor hours at a cost of \$1,670. See (below) Table 2: Average Annual EPA Burden and Cost – NSPS for Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (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 increase of two labor hours from the most recently approved ICR due to a change in assumptions. The previous ICR assumed that only new respondents would spend time to read and review the regulatory requirements. This ICR assumes that each respondent will spend one hour annually re-familiarizing themselves with the rule.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 72 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-2012-0655. 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-2012-0655 and OMB Control Number 2060-0032 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 Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (Renewal)

Burden Items	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Respondent Hours per Occurrence	Number of Occurrences per Respondent per Year	Hours per Respondent per Year (A x B)	Number of Respondents per Year ^a	Technical Hours per Year (C x D)	Management Hours per Year (E x 0.05)	Clerical Hours per Year (Ex0.1) ^a	Total Labor Costs per Year, \$ ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
New Sources								
A. Read and understand rule requirements ^c	1	1	1	2	2	0.1	0.2	\$231.29
B. Required Activities								
Initial performance test								
Ref Method 9 tests ^d	29.7	4	118.8	0	0	0	0	\$0
Ref Method 5 ^d	4	1	4	0	0	0	0	\$0
Repeat performance test ^e	4	0.2	0.8	0	0	0	0	\$0
Existing sources								
Monitoring of operations and emissions	See 4E							
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 demonstration of CMS	2	1	2	0	0	0	0	\$0
Report of initial performance test	See 3B							

Burden Items	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Respondent Hours per Occurrence	Number of Occurrences per Respondent per Year	Hours per Respondent per Year (A x B)	Number of Respondents per Year ^a	Technical Hours per Year (C x D)	Management Hours per Year (E x 0.05)	Clerical Hours per Year (Ex0.1) ^a	Total Labor Costs per Year, \$ ^b
Existing Sources								
Notification of operational change	2	1	2	0	0	0	0	\$0
Semiannual reports ^f	16	2	32	2	64	3.2	6.4	\$7,401.31
Subtotal for Reporting Requirements						76		\$7,633
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 _g								
Records of operating parameters ^g	0.25	365	91.25	2	182.5	9.13	18.25	\$21,105.30
F. Audits	N/A							
Subtotal for Recordkeeping Requirements						210		\$21,105
TOTAL ANNUAL BURDEN and COST (rounded)						286		\$28,700
Capital/O&M Costs								\$0
Grand Total (Labor and Capital/O&M Costs)(rounded)^h								\$28,700

Assumptions:

^a. We have assumed that there are approximately 2 respondents subject to the rule, with no new sources expected over the next three-years 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. We assumed that each respondent will spend one hour each year to read and understand the rule requirements.

^d. 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 Method 9 published in the 11th edition of the Official Methods of analysis of the Association of Official analytical Chemists dates 1970. Each run shall be conducted for the time and under the conditions specified in the applicable rule. The particulate matter concentration and volumetric flow rate of the effluent gas shall be determined by Method 5 which requires a sampling time and a sample volume for each run of at least 60 minutes and 1.50 dscm (53 dscf).

^e. We assume that 20 percent of initial performance tests must be repeated due to failure.

^f. We have assumed that it will take each respondent 16 hours twice per year to complete the semiannual reports.

^g. Sources are required to maintain a daily record of operating parameters. We assume records will be recorded 365 days per year.

^h. 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 Ammonium Sulfate Manufacturing Plants (40 CFR Part 60, Subpart PP) (Renewal)

Burden Items	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA Hours per Occurrence	Occurrences per Plant per Year	EPA Hours per Plant per Year (AxB)	Plants per Year ^a	Technical EPA Hours per Year (Cx D)	Managerial Hours per Year (Ex0.05)	Clerical Hours per Year (Ex0.1)	Cost per year, \$ ^b
Required Activities								
New Plant								
Initial performance tests ^c	24	1	24	0	0	0	0	\$0
Repeat performance tests ^d	24	0.2	4.8	0	0	0	0	\$0
Report Review								
New Plant								
Notification of construction	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 demonstration of CMS	0.5	1	0.5	0	0	0	0	\$0
Existing Plants								
Semiannual reports ^e	8	2	16	2	32	1.6	3.2	\$1,674.88
TOTAL ANNUAL BURDEN and COST (rounded)^f						37		\$1,670

Assumptions:

^a We have assumed that there are approximately 2 respondents subject to the rule, with no new sources expected over the next three-years 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 assume that EPA personnel will attend initial performance tests.

^d. We assume that 20 percent of initial performance test must be repeated due to failure.

^e. We have assumed that it will take 8 hours to review each semiannual report.

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