

Table 1: Annual Respondent Burden and Cost – NSPS for Nitric Acid Plants (40 CFR Part 60, Sub

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=AxB)	(D) Number of Respondents per Year ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
Sources Constructed or Modified after 10/14/2011 – Subpart Ga				
A. Familiarize with regulatory requirements ^c	1	1	1	5
B. Required Activities				
Initial performance test	180	1	180	1.2
Demonstration of CERMS	180	1	180	1.2
Repeat performance test ^d	180	1	180	0.24
Daily monitoring of CERMS	0.5	330	165	1.2
C. Create Information	See 3B			
D. Gather Existing Information	See 3E			
E. Write Report				
Notification of construction/reconstruction	2	1	2	1.2
Notification of actual startup	2	1	2	1.2
Notification of initial performance test	2	1	2	1.2
Notification of demonstration of CERMS	2	1	2	1.2
Report of performance test	2	1	2	1.2
Report of noncompliance with NOX emission standard ^e	2	1	2	0.5
Subtotal for Reporting Requirements - Subpart Ga				
Existing Sources – Subpart G				
A. Familiarize with regulatory requirements ^c	1	1	1	24
B. Write Report				
Notification of physical/operational changes ^f	8	1	8	0.2
Semiannual reports ^g	8	2	16	24
Subtotal for Reporting Requirements- Subpart G				
Total Reporting Requirements for Subparts G and Ga				
4. Recordkeeping Requirements				
A. Familiarize with regulatory requirements	See 3A			
B. Plan activities	See 3B			
C. Implement activities	See 3B			
D. Develop record system	N/A			
Subpart Ga: Sources Constructed or Modified after 10/14/2011				
E. Time to Enter Information				
Records of noncompliance ^e	0.5	1	0.5	0.5
Daily production and flow rates	8	1	8	5
Data collection	0.13	330	41.25	5
Records of occurrence of startup, shutdown and malfunctions	8	1	8	5

F. Time to Train Personnel				
Train personnel for CERMS maintenance	16	2	32	5
Subtotal for Recordkeeping Requirements - Subpart Ga				
Subpart G: Existing Sources				
E. Time to Enter Information				
Records of daily production rates and hours of operation	8	1	8	24
Records of occurrence of startup, shutdown and malfunctions	8	1	8	24
Records of performance test data	80	1	80	0
G. Audits	N/A			
Subtotal for Recordkeeping Requirements - Subpart G				
Total Recordkeeping Requirements for Subparts G and Ga				
Total Labor Burden and Cost for Subpart Ga (rounded) ^h				
Total Labor Burden and Cost for Subpart G (rounded) ^h				
TOTAL LABOR BURDEN AND COST (rounded) ^h				
TOTAL CAPITAL AND O&M COST (rounded) ^h				
GRAND TOTAL (rounded) ^h				

Assumptions

- ^a We have assumed there are approximately 29 respondents (24 subject to Subpart G and 5 subject to Subpart Ga), with 1.2 new respondents per year.
- ^b This ICR uses the following labor rates: \$106.45 for technical, \$138.43 for managerial, and \$52.77 for clerical labor. These rates are based on the 2014 Bureau of Economic Analysis (BEA) Survey of Professional and Technical Occupations (SPTO) data.
- ^c We have assumed that each respondent will have to familiarize with regulatory requirements each year.
- ^d We assume that 20% of sources will have to repeat performance tests.
- ^e We assume 10% of sources will report non compliance.
- ^f We assume 1 existing facility will be reconstructed or modified over the next 5 years (0.2 respondents per year).
- ^g We assume it will take 8 hours to write semiannual reports.
- ^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Parts G and Ga) (Renewal)

106.45 138.43 52.77

(E) Technical Hours per Year (E=CxD)	(F) Management Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Total Labor Costs per Year, ^b
5	0.25	0.5	\$593.24
216	10.8	21.6	\$25,628.08
216	10.8	21.6	\$25,628.08
43.2	2.16	4.32	\$5,125.62
198	9.9	19.8	\$23,492.40
2.4	0.12	0.24	\$284.76
2.4	0.12	0.24	\$284.76
2.4	0.12	0.24	\$284.76
2.4	0.12	0.24	\$284.76
2.4	0.12	0.24	\$284.76
1	0.05	0.1	\$118.65
795			\$82,010
24	1.2	2.4	\$2,847.56
1.6	0.08	0.16	\$189.84
384	19.2	38.4	\$45,561.02
443			\$45,751
1,240			\$128,000
0.25	0.01	0.03	\$29.66
40	2	4	\$4,745.94
206.25	10.31	20.63	\$24,471.25
40	2	4	\$4,745.94

160	8	16	\$18,983.76
513			\$52,977
192	9.6	19.2	\$22,780.51
192	9.6	19.2	\$22,780.51
0	0	0	\$0
442			\$45,561
955			\$98,500
1,310			\$135,000
885			\$91,300
2,190			\$226,000
			\$2,740,000
			\$2,970,000

new sources per year becoming subject to the rule over the next three years

rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2014, "Table 2. Civilian Workers, by c

occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by

7 110 percent to account for the benefit packages available to those employed by private industry.

Table 2: Average Annual EPA Burden and Cost – NSPS for Nitric Acid Plants (40 CFR Part 60,

47.62

Burden Item	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Respondent per Year (C=AxB)	(D) Number of Respondents per Year ^a	(E) Technical Hours per Year (E=CxD)
Subpart Ga ^a					
Required Activities					
Observe initial performance test	24	1	24	1.2	28.8
Repeat performance test ^c	24	0.2	4.8	1.2	5.76
Report Review					0
Notification of construction/reconstruction	2	1	2	1.2	2.4
Notification of actual startup	0.5	1	0.5	1.2	0.6
Notification of initial performance test	0.5	1	0.5	1.2	0.6
Review test results	8	1	8	1.2	9.6
Review test NOX noncompliance reports ^d	8	1	8	0.5	4
Subtotal for Subpart Ga					
Subpart G					
Report Review					
Semiannual reports ^a	2	2	4	24	96
Subtotal for Subpart G					
TOTAL ANNUAL BURDEN and COST (rounded) ^e					

Assumptions

- ^a We have assumed there are approximately 29 respondents (24 subject to Subpart G and 5 subject to Subpart Ga), with 1.2
- ^b This ICR uses the following average hourly labor rates: \$64.16 for managerial (GS-13, Step 5, \$40.10×1.6), \$47.62 (GS-
- ^c We assume that 20% of sources will have to repeat performance tests.
- ^d We assume 10% of sources will report non-compliance
- ^e Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Subparts G and Ga) (Renewal)

64.16 25.76

(F) Management Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Total Labor Costs per Year, ^b
1.44	2.88	\$1,538.04
0.29	0.58	\$307.61
0	0	\$0.00
0.12	0.24	\$128.17
0.03	0.06	\$32.04
0.03	0.06	\$32.04
0.48	0.96	\$512.68
0.2	0.4	\$213.62
60		\$2,764
4.8	9.6	\$5,126.78
110		\$5,127
170		\$7,890

new sources per year becoming subject to the rule over the next three years
 12, Step 1, \$29.76×1.6) for technical and \$25.76 (GS-6, Step 3, \$16.10×1.6) for clerical. These rates are from the Office

of Personnel Management (OPM), 2016 General Schedule, which excludes locality rates of pay. The rates have been in

creased by 60 percent to account for the benefit packages available to government employees.