

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Phosphoric Acid Manufacturing and Phosphate Fertilizers Production
(40 CFR Part 63, Subparts AA and BB) (Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Phosphoric Acid Manufacturing and Phosphate Fertilizers Production (40 CFR Part 63, Subparts AA and BB) (Renewal), EPA ICR Number 1790.08, OMB Control Number 2060-0361

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Phosphoric Acid Manufacturing and Phosphate Fertilizers Production (40 CFR Part 63, Subparts AA and BB) were proposed on December 27, 1996, promulgated on June 10, 1999, and amended on: June 12, 2002; April 20, 2006; and August 19, 2015. These regulations apply to both new and existing phosphoric acid manufacturing facilities and phosphate fertilizers production facilities that are major sources of hazardous air pollutants (HAPs). The rule applies to component processes at these facilities and to any new, modified, or reconstructed sources. Component processes include the following facilities: wet process phosphoric acid plants, superphosphoric acid plants, purified phosphoric acid plants, phosphate rock dryers, phosphate rock calciners, diammonium and monoammonium phosphate plants, and granular triple superphosphate (GTSP) plants. The 2015 amendment sets forth the following changes: 1) emission limits for mercury and total fluoride from phosphate rock calciners were established; 2) work practice standards to control hydrogen fluoride emissions from gypsum dewatering stacks and cooling ponds were established; 3) startup, shutdown, and malfunction exemptions were removed and work practices standards added during periods of startup and shutdown; 4) modifications and correction to testing and monitoring provisions were made; and 5) that clarification was added to the applicability of the standards. 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 63, Subparts AA and BB.

In general, all NESHAP 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 NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents, and retain the file for at least five years following the generation date of such 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.

There are approximately 13 phosphoric acid manufacturing and phosphate fertilizer production facilities (aka: the “Affected Public”), which are both owned and operated by the private industry. None of the facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Phosphoric Acid Manufacturing and Phosphate Fertilizers Production (40 CFR Part 63, Subparts AA and BB) (Renewal). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors; this burden may be found below in Table 2: Average Annual EPA Burden and Cost - NESHAP for Phosphoric Acid Manufacturing and Phosphate Fertilizers Production (40 CFR Part 63, Subparts AA and BB) (Renewal).

Over the next three years, approximately 13 respondents (facilities) per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. At these 13 facilities, there are 12 phosphoric acid units and 11 phosphate fertilizer units, for a total of 23 process units.

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 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. 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, HAP emissions from phosphoric acid manufacturing and phosphate fertilizers production facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subparts AA and BB.

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 these 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 these standards are being met. The performance test may also be observed.

The required quarterly and 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 63, Subparts AA and BB.

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 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 associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these 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) 962-0490; and 2) the PotashCorp, at (847) 849-4200.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as to 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 these 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.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement

action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to either the destruction or nonexistence of essential records.

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 these standards 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 phosphoric acid manufacturing and phosphate fertilizers production 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 NESHAP for Phosphoric Acid Manufacturing and Phosphate Fertilizers Production (40 CFR Part 63, Subparts AA and BB).

A source must make the following reports:

Notifications	
Notification and application of construction/reconstruction	63.5(d)
Notification of initial startup	63.9(b), 63.607(a), 63.627(a)
Notification of initial performance test	63.7(b), 63.9(e), 63.607(a), 63.627(a)

Notifications	
Extension of compliance	63.607(a), 63.627(a), 63.9(c)
Special compliance requirements	63.607(a), 63.627(a), 63.9(d)
Waiver of performance testing	63.7(h)
Notification of compliance status	63.607(a), 63.627(a), 63.9(h)

Reports	
Initial performance test report	63.607(b)(2), 63.627(b)(2), 63.10(d)
Semiannual report	63.10(e), 63.607(b)(3), 63.607(b)(5), 63.627(b)(3), 63.627(b)(5)
Quarterly report	63.10(e), 63.607(b)(3), 63.627(b)(3)
Annual report	63.10(e), 63.607(b)(2), 63.627(b)(2)
Develop monitoring plan	63.608(c), 63.628(c)
Prepare gypsum stack management plan	63.602(d)-(e)

A source must keep the following records:

Recordkeeping	
Performance test report	63.607(b)(1), 63.627(b)(1), and 63.10(b)
Excess emissions report.	63.607(b)(1), 63.627(b)(1), and 63.10(b)
Summary report	63.607(b)(5), 63.627(b)(5), and 63.10(b)
Reports and notifications	63.10(b)
Records retained for 5 years	63.10(b)(1)

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 opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Methods 5 and 13 test, and repeat performance tests if necessary.
Perform annual performance test.
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.
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.

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
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 (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 five years.

5(c) Small Entity Flexibility

There are no small entities (i.e., small businesses) affected by this regulation. The Phosphoric Acid and Phosphate Fertilizer NESHAP does not contain any provisions reserved exclusively for the benefit of small entities; however, there are provisions that reduce the impact on all regulated entities, which would include any small entities. This includes requiring operating parameter monitoring instead of CEMS.

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 – NESHAP for Phosphoric Acid Manufacturing and Phosphate Fertilizers Production (40 CFR Part 63, Subparts AA and BB)

(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. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may neither conduct nor 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 2,200 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 NESHAP 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	\$138.43 (\$65.92+ 110%)
Technical	\$106.45 (\$50.69 + 110%)
Clerical	\$52.77 (\$25.13 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, "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 regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) 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)
Temperature monitoring device	\$2,700	0	\$0	\$886	13	\$11,518
Mercury testing ^a	\$0	0	\$0	\$8,000	6	\$48,000
TF testing ^{a, b}	\$0	0	\$0	\$5,600	9	\$50,400
Performance evaluation ^c	\$0	0	\$0	\$2,000	23	\$46,000
BLDS alarm ^d	\$25,200	0	\$0	\$9,900	3	\$29,700
		Total ^e	\$0		Total ^d	\$186,000

^a Based on the 2015 RTR, we estimate there are 6 phosphate rock calciners that are subject to Hg and TF testing.

^b Based on the 2015 RTR, we estimate there are 3 oxidation reactors subject to TF testing.

^c Facilities must follow performance evaluation criteria (calibrations) for control devices. There are 23 process units at the 13 facilities.

^d Based on the 2015 RTR, we estimate there are 3 BLDS alarms. We assumed capital costs were incurred during the first year of the amendment.

^e 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 \$186,000. 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 \$186,000. These are 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 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 \$63,000.

This cost is based on the average hourly labor rate as follows:

Managerial	\$64.16 (GS-13, Step 5, \$40.10 + 60%)
Technical	\$47.62 (GS-12, Step 1, \$29.76 + 60%)
Clerical	\$25.76 (GS-6, Step 3, \$16.10 + 60%)

These rates are from the Office of Personnel Management (OPM), 2016 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 – NESHAP for Phosphoric Acid Manufacturing and Phosphate Fertilizers Production (40 CFR Part 63, Subparts AA and BB) (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 to these same standards. 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) 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
Notification of construction/reconstruction	0	0	0	0
Notification of initial performance test	0	0	0	0
Notification of compliance status	0	0	0	0
Annual performance test report	13	1	0	13
Quarterly reports of excess emissions	1.3	4	0	5.2
Semiannual report of no excess emissions	11.7	2	N/A	23.4
			Total	41.6

The number of Total Annual Responses is 42 (rounded).

The total annual labor costs are \$227,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Phosphoric Acid Manufacturing and Phosphate Fertilizers Production (40 CFR Part 63, Subparts AA and BB) (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 below in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 2,200. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Phosphoric Acid Manufacturing and Phosphate Fertilizers Production (40 CFR Part 63, Subparts AA and BB) (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 52 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$186,000. 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 1,370 labor hours at a cost of \$63,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Phosphoric Acid Manufacturing and Phosphate Fertilizers Production (40 CFR Part 63, Subparts AA and BB) (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 adjustment increase in the total estimated cost, burden, number of responses, and capital and O&M costs as currently identified in the OMB Inventory of Approved Burdens. The change in burden for the new and existing facilities is due primarily to a program change in the regulation requiring: 1) mercury testing and total fluoride (TF) testing of phosphate rock calciners; and 2) TF testing of oxidation reactors. The Residual Risk and Technology Review (RTR) associated with this program change estimated 12 phosphoric acid units and 11 phosphate fertilizer units (a total of 23 process units) located at 13 facilities.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 52 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 neither conduct nor 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-2012-0676. 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-2012-0676 and OMB Control Number 2060-0361 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 – NESHAP for Phosphoric Acid Manufacturing and Phosphate Fertilizers Production (40 CFR Part 63, Subparts AA and BB) (Renewal)

Burden item	(A) Technical Hours per Occurrence	(B) Occurrence s per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person hours per year (E=CxD)	(F) Managerial person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost per Year (\$) ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with regulatory requirements ^c	4	1	4	13	52	2.6	5.2	\$6,169.72
B. Required activities								
Initial performance test	28	1	28	0	0	0	0	\$0
Repeat initial performance test	28	0.1	2.8	0	0	0	0	\$0
Startup, shutdown, malfunction plan	40	1	40	0	0	0	0	\$0
Annual performance test	28	1	28	13	364	18.2	36.4	\$43,188.05
Repeat annual performance test ^d	28	0.2	5.6	0.91	5.10	0.25	0.5	\$604.63
Mercury testing - Calciners ^e	10	1	10	6	60	3	6	\$7,118.91
TF testing								
a. Oxidation Reactors ^f	10	1	10	3	30	1.5	3	\$3,559.46
b. Calciners ^e	10	1	10	6	60	3	6	\$7,118.91
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Notification of applicability	N/A							
Notification of construction./reconstruction	2	1	2	0	0	0	0	\$0
Notification of actual startup	N/A							

GRAND TOTAL (rounded) ^m								\$413,000
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Assumptions

^a Based on the 2015 RTR, we estimate that 12 phosphoric acid units and 11 phosphate fertilizers, for a total of 23 processing units, located at 13 facilities will be subject to the rule. No additional respondents will become subject the rule over the three-year period of this ICR.

^b This ICR uses a labor rate of \$138.43 for managerial hours, \$106.45 for technical hours, and \$52.77 for clerical hours. We assume managerial hours are 5 percent of technical hours, and clerical hours are 10 percent of technical hours.

^c We assume that all respondents will have to familiarize with the regulatory requirements each year.

^d We have assumed that 7 percent of respondents will fail the performance test and must repeat it.

^e Based on the 2015 RTR, we estimate there are 6 phosphate rock calciners that are subject to Hg and TF testing.

^f Based on the 2015 RTR, we estimate there are 3 oxidation reactors subject to TF testing.

^g We have assumed that 10 percent of sources will report exceedances quarterly.

^h We have assumed that 90 percent of sources will report no excess emissions semiannually.

ⁱ No longer applies; SSM exemption was eliminated as part of the 2015 amendment.

^j This is a one-time activity. We assume the burden was already incurred during the first year of the amendment.

^k We have assumed that it will take 1.5 hours per respondent to enter information and that information is entered one-time per week for 52 weeks per year.

^l Records of BLDS alarms must be kept, we assume each fabric filter will warrant 5 hours of documenting for this requirement.

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

Table 2: Average Annual EPA Burden and Cost – NESHAP for Phosphoric Acid Manufacturing and Phosphate Fertilizers Production (40 CFR Part 63, Subparts AA and BB) (Renewal)

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person hours per year (E=CxD)	(F) Managerial person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost per Year (\$) ^b
Initial performance test	40	1	40	0	0	0	0	\$0
Repeat initial performance test								
Retesting preparation	8	1	8	0	0	0	0	\$0
Retesting	40	1	40	0	0	0	0	\$0
Excess emissions enforcement activities	N/A							
Report review								
Notification of applicability	2	1	2	0	0	0	0	\$0
Notification of construction./reconstruction	N/A							
Notification of anticipated startup	N/A							
Notification of actual startup	N/A							
Notification of special compliance requirements	N/A							
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Notification of compliance status	2	1	2	0	0	0	0	\$0
Observe stack tests ^c	20	1	20	3	60	3	6	\$3,204.24
Annual performance test	40	1	40	13	520	26	52	\$27,770.08
Repeat annual performance test ^d	40	1	40	0.91	36.4	1.82	3.64	\$1,943.91
Excess emissions report ^e	20	4	80	1.3	104	5.2	10.4	\$5,554.02
No excess emissions report ^f	20	2	40	11.7	468	23.4	46.8	\$24,993.07
Review monitoring plan ^g	10	1	10	0	0	0	0	\$0

Review gypsum stack and cooling pond management plan ^g	8	1	8	0	0	0	0	\$0
Waiver application	N/A							
Startup, shutdown, malfunction report ^h	N/A							
TOTAL ANNUAL BURDEN AND COST (rounded) ⁱ						1,370		\$63,000

Assumptions

^a Based on the 2015 RTR, we estimate that 12 phosphoric acid units and 11 phosphate fertilizers, for a total of 23 processing units, located at 13 facilities will be subject to the rule. No additional respondents will become subject the rule over the three-year period of this ICR.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$64.16 for Managerial, \$47.62 for Technical and \$25.76 for Clerical. These rates are from the Office of Personnel Management (OPM) “2016 General Schedule” which excludes locality rates of pay.

^c Assumes EPA will attend 20 percent of stack tests. Only considers facilities with new emission points.

^d We have assumed that 7 percent of respondents will fail the initial performance test and must repeat it.

^e We have assumed that 10 percent of respondent will report exceedances. Respondents are required to report quarterly.

^f We have assumed that 90 percent of existing respondents report no excess emissions semiannually.

^g This is a one-time activity. We assume the burden was already incurred during the first year of the amendment.

^h This requirement no longer applies.

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