

Burden Item	A	B	C
	Person Hours Per Occurrence	Number of Occurrences Per Respondent Per Year	Person Hours Per Respondent Per Year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting Requirements			
A. Familiarization with rule requirements	1	1	1
B. Required activities			
New Sources			
Initial Performance Test			
AOCA Method 9 tests ^c	29.7	1	29.7
Reference Method 13A or 13B tests ^d	4	1	4
Repeat performance test ^e	4	0.2	0.8
C. Create Information	See 3B		
D. Gather existing information	See 3E		
E. Write Report			
New Sources			
Notification of construction/reconstruction	2	1	2
Notification of actual startup	2	1	2
Notification of initial performance test	2	1	2
Notification of CMS demonstration	2	1	2
Report of initial performance test	See 3B		
Site-specific methodology plan ^f	2	1	2
Existing Sources			
Notification of operational change ^g	2	1	2
Semiannual report of exceedances ^h	2	2	4
Subtotal Reporting Requirements			
4. Recordkeeping Requirements			
A. Read and understand rule requirements	See 3A		
B. Plan activities	See 3B		
C. Implement activities	See 3B		
D. Develop record system	N/A		
E. Time to enter information			
Records of operation parameters and emissions ⁱ	0.25	350	87.5
Subtotal Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded)^j			
TOTAL CAPITAL AND O&M Costs (rounded)^j			
GRAND TOTAL (rounded)^j			

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 13. There will be a one year period of this ICR.

- ^b This ICR uses the following labor rates: Technical \$117.92 (\$56.15 + 110%); Managerial \$147.40 (\$70.19 + 110%). Source: U.S. States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by occupation and hours." Rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry, and Clerical hours are 10 percent of Technical hours.
- ^c As specified in the general provisions, each performance test shall consist of three separate runs using the appropiate molybdovanadophosphate method (AOAC) Method 9 published in the 11 Edition of the Official Methods of Analysis. The P_2O_5 feed rate. No sources are anticipated to conduct an initial performance test because there are no new sources anticipated over the period of this ICR.
- ^d As specified in the general provisions, each performance test shall consist of three separate runs using the appropiate conditions specific in the applicable rule. For these rules, the total fluoride concentration and volumetric flow rate, sampling time and a sample volume for each run of at least 60 minutes and 0.85 dscm (30 dscf). No sources are anticipated over the period of this ICR.
- ^e We assume that 20 percent of initial performance tests must be repeated due to failure.
- ^f Only sources that have a granular triple superphosphate storage facility are required to submit this initial plan. No sources are anticipated over the period of this ICR.
- ^g We assume that 15 percent of the sources would be attributed to operational changes.
- ^h We assume that each source will submit a semiannual report due to excess emission and monitoring systems if operation is 350 days per year as specified in the NSPS review document.
- ⁱ Sources are required to maintain a daily record of operating parameters (e.g., determine equivalent P_2O_5 content). No sources are anticipated over the period of this ICR.
- ^j Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

117.92

147.4

57.02

D	E	F	G	H
Respondents Per Year ^a	Technical Person-Hours Per Year (E=CxD)	Management Person Hours Per Year (E x 0.05)	Clerical Person Hours Per Year (E x 0.10)	Total Costs Per Year (\$) ^b
13	13	0.65	1.3	\$1,702.90
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
2	4	0.2	0.4	\$523.97
13	52	2.6	5.2	\$6,811.58
		79		\$9,038
13	1137.5	56.88	113.75	\$149,003.40
		1,308		\$149,003
		1,390		\$158,000
				\$320,000
				\$478,000

ll be no additional new sources that will become subject to the rule over the three-

.10%); and Clerical \$57.02 (\$27.15 + 110%). These rates are from the United
l and industry group.” The rates are from column 1, “Total compensation.” The
vate industry. This ICR assumes that Managerial hours are 5 percent of Technical

licable test method. Sources are required to use the spectrophotometric
nalysis of the Association of Official Analytical Chemists dated 1970, to determine
urces anticipated over the period of this ICR.

licable test method. Each run shall be conducted for the time and under the
ate of the effluent gas shall be determined by Method 13 which requires a
: anticipated to conduct an initial performance test because there are no new

No sources are anticipated to submit this plan because there are no new sources

performance over the three-year period.

nt and total pressure drop across the scrubbing system). We assume that the

W and X) (Renewal)

Burden Item	A	B	C
	EPA Hours per Occurrence	Number of Occurrences Per Year	EPA Person Hours Per Year (A x B)
Report Review			
New Plants			
Notification of construction/reconstruction	2	1	2
Notification of initial startup	0.5	1	0.5
Notification of actual startup	0.5	1	0.5
Notification of initial test	0.5	1.2	0.6
Review test results	8	1.2	9.6
Notification of CMS demonstration	0.5	1	0.5
Existing Plants			
Semiannual report ^c	1	2	2
TOTAL COST (rounded)^d			

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 13. There will be 13 of this ICR.

^b This cost is based on the average hourly labor rate as follows: Technical \$48.75 (GS-12, Step 1, \$30.47 + 60%); Managerial \$16.49 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours (OPM), 2018 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to reflect inflation.

^c We have assumed that it will take one hour twice per year to review the semiannual reports.

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

48.75 65.71 26.38

D	E	F	G	H
Plants Per Year ^a	Technical Hours Per Year (C x D)	Management Hours Per Year (E x 0.05)	Clerical Hours Per Year (E x 0.10)	Total Cost Per Year (\$) ^b
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
13	26	1.3	2.6	\$1,421.51
	30			\$1,420

no additional new sources that will become subject to the rule over the three-year period

anagerial \$65.71 (GS-13, Step 5, \$41.07 + 60%); and Clerical \$26.38 (GS-6, Step 3, percent of Technical hours. These rates are from the Office of Personnel Management) account for the benefit packages available to government employees.