

Table 1: Annual Respondent Burden and Cost – NESHAP for Hydrochloric Acid Production (

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
A. Familiarize with rule requirements ^c	4	1	4	19
B. Gather information ^c	4	1	4	0
C. Write reports				
Initial notification ^c	2	1	2	0
Application for construction ^c	2	1	2	0
Notification of intent to conduct performance test	2	1	2	3.8
Notification of compliance status ^c	19.5	1	19.5	0
First compliance report ^{c, d}	8.5	1	8.5	0
Semiannual compliance report ^e	4.5	2	9	19
Subsequent performance test reports ^f	4	1	4	0
Startup, shutdown, malfunction report ^g	2	10	20	0
Subtotal for Reporting Requirements				
4. Recordkeeping Requirements				
A. Plan activities ^{c, h}	10	1	10	0
B. Implement activities				
Record startups, shutdown, malfunctions ⁱ	1	10	10	19
Conduct performance test	48.5	1	48.5	3.8
Record CPMS measurements ^j	1	365	365	19
CMPS calibration and maintenance ^k	3.9	50	195	19
Check for and repair leaks ^l	1	365	365	19
C. Develop record system				
Startup, shutdown, malfunction plan ^c	40	1	40	0
Site-specific monitoring plan ^c	20	1	20	0
Site-specific test plan ^c	20	1	20	0
Leak detection and repair plan ^c	40	1	40	0
Record maintenance activities ^o	1	4	4	19
D. Time to train personnel			0	
CPMS acquisition and installation ^c	20	1	20	0
CPMS inspection and monitoring ^c	4	1	4	0
E. Store, file, and maintain records ^m	20	1	20	19

F. Retrieve records/reports ⁿ	20	1	20	19
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded)				
Capital and O&M Cost^p				
Grand TOTAL^p				

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 19. There will be n will become subject to the rule over the three-year period of this ICR.
- ^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$11 \$57.02 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Sta Civilian Workers, by Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The r Account for the benefit packages available to those employed by private industry.
- ^c This is a one-time only activity for each facility and only sources that started up prior to April 17, 2003 are required
- ^d We have assumed that no new respondents will prepare the first compliance report.
- ^e We have assumed that it will take each respondent 4.5 hours two times per-year to prepare the semiannual compliar
- ^f We have assumed that no facilities will take 4 hours to perform tests after the initial compliance determination , by e by significantly increasing its production.
- ^g We have assumed that it will take each new respondents two hours ten times a year to prepare a SSM report.
- ^h We have assumed that it will take each respondent 10 hours to record plan activities.
- ⁱ We have assumed that each respondent will have to implement SSM activities 10 times per-year.
- ^j We have assumed that respondents will have to record CPMS measurements 365 time per year.
- ^k We have assumed that respondents will have to implement CPMS calibration and maintenance activities 50 times pe
- ^l We have assumed that respondents are required to check for and repair leaks 365 times per-year.
- ^m We have assumed that each respondent will take 20 hours once per-year to store, file and maintain records.
- ⁿ We have assumed that it will take respondent 20 hours to retrieve records/reports once per-year.
- ^o We have assumed respondents will average 4 maintenance activites per year based on commer
- ^p Totals have been rounded to 3 significant figures. Figures may not round exactly due to rounding.

40 CFR Part 63, Subpart NNNNN) (Amendments)

117.92

147.4

57.02

(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, \$^b
76	3.8	7.6	\$9,955.39
0	0	0	\$0.00
0	0	0	\$0.00
0	0	0	\$0.00
7.6	0.38	0.76	\$995.54
0	0	0	\$0.00
0	0	0	\$0.00
171	8.55	17.1	\$22,399.63
0	0	0	\$0.00
0	0	0	\$0.00
293			\$33,351
0	0	0	\$0.00
190	9.5	19	\$24,888.48
184.3	9.22	18.43	\$24,141.83
6,935	346.75	693.5	\$908,429.52
3,705	185.25	370.5	\$485,325.36
6,935	346.75	693.5	\$908,429.52
0	0	0	\$0.00
0	0	0	\$0.00
0	0	0	\$0.00
0	0	0	\$0.00
76	3.8	7.6	\$9,955.39
	0	0	\$0.00
0	0	0	\$0.00
0	0	0	\$0.00
380	19	38	\$49,776.96

380	19	38	\$49,776.96
21,603			\$2,460,724
22,000			\$2,500,000
			\$162,000
			\$2,700,000

to additional new sources that

.7.92 per hour for Technical labor, and

tistics, June 2018, “Table 2.

ates have been increased by 110% to

.to submit initial notification

ice report.

either bringing a new product on line or

er year.

nts submitted by industry. See EPA-HQ-OAR-2018-0417-01

134 at pages 19-20.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Hydrochloric Acid Production

Activity	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)
Review initial notification ^c	4	1	4
Review application for construction ^c	4	1	4
Review notification of intent to conduct test ^d	4	1	4
Review notification of compliance status ^c	20	1	20
Review first compliance report ^e	20	1	20
Review semiannual compliance report ^e	20	2	40
Review subsequent performance test report ^f	10	1	10
Review startup, shutdown, malfunction report ^g	8	10	80
Attend performance test	20	1	20
TOTAL ANNUAL BURDEN AND COST (rounded) ^h			

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 19. There will become subject to the rule over the three-year period of this ICR.
- ^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 x 1.6), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 x 1.6), and \$16.49 x 1.6). These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” v
- ^c This is a one-time only activity for each facility and only sources that started up prior to April 17, 2003 are req
- ^d We have assumed that each respondent will take 4 hours to review notification of intent to conduct test.
- ^e We have assumed that each respondent will take 20 hours to review the first compliance report (applies only to report twice per year
- ^f We have assumed that no facilities will perform tests after the initial compliance determination.
- ^g We have assumed that it will take each new respondents eight hours to review the SSM report.
- ^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ction (40 CFR Part 63, Subpart NNNNN) (Amendments)

48.75 65.71 26.38

(D) Respondents per year ^a	(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, \$ ^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
19	760	38	76	\$41,551.86
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
874				\$41,600

be two additional new sources per year that

it for government overhead expenses:

1.6), and Clerical rate of \$26.38 (GS-6, Step 3, which excludes locality rates of pay.

quired to submit initial notification.

new respondents) once per year and 20 hours to review the semiannual compliance

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

(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F)
Continuous monitoring systems (CMS)	\$712 N/A	2 N/A	\$1,424 N/A	\$8,473 \$16,385	19 (existing) 0 (new)	\$160,987 \$0
Total			\$1,420			\$161,000