

**Table 1: Annual Respondent Burden and Cost – NSPS for Sulfuric Acid Plants (40 CFR Part**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C = A x B)	(D) Respondents per year <sup>a</sup>
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting requirements				
A. Familiarization with rule requirements <sup>c</sup>	1	1	1	53
B. Required activities				
Initial performance tests <sup>d</sup>	300	1	300	0
Reference Method 9 test <sup>e</sup>	4	1	4	0
Repeat of performance tests <sup>f</sup>	300	1	300	0
C. Create information	See 3B			
D. Gather existing information	See 3B			
E. Write Report				
Application of construction or modification	2	1	2	0
Notification of actual startup	2	1	2	0
Notification of physical or operational change	2	1	2	0
Notification of demonstration of CMS	2	1	2	0
Notification of initial performance test	2	1	2	0
Semiannual report of excess emissions <sup>g</sup>	40	2	80	53
<b>Subtotal for Reporting Requirements</b>				
4. Recordkeeping requirements				
A. Familiarization with rule requirements	See 3A			
B. Plan activities	See 3A			
C. Implement Activities	See 3A			
D. Develop record system	N/A			
E. Time to enter information				
Records of operating parameters <sup>h</sup>	0.25	350	87.5	53
Record of conversion factors/calculation <sup>j,k</sup>	0.05	1,050	52.5	53
F. Time to train personnel	N/A			
G. Time for audits	N/A			
<b>Subtotal for Recordkeeping Requirements</b>				
<b>Total Labor Burden and Costs (rounded) <sup>j</sup></b>				
<b>Total Capital and O&amp;M Cost (rounded) <sup>j</sup></b>				
<b>GRAND TOTAL (rounded) <sup>j</sup></b>				

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 53 respondents, with no additional new or reconstructed sources becom

<sup>b</sup> This ICR uses the following labor rates: \$122.66 (technical), \$149.84 (managerial), and \$60.88 (clerical). These rates Labor Statistics, September 2020, “Table 2. Civilian workers, by occupational and industry group.” The rates are from 110 percent to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed that it will take one hour for each respondent to read instructions.

<sup>d</sup> We have assumed that it will take 300 hours for each respondent to complete an initial performance test.

- <sup>e</sup> We have assumed that it will take four hours for each respondent to complete a reference Method 9 test.
- <sup>f</sup> We have assumed that it will take 300 hours to repeat performance test due to failures.
- <sup>g</sup> We have assumed that it will take 40 hours, twice a year, for each respondent to write an excess emission report.
- <sup>h</sup> We have assumed that each respondent will enter information on records of operating parameters 350 times per year.
- <sup>i</sup> We have assumed that records of conversion factors will be recorded three times daily, at 350 days per year, for a total of 1050 times.
- <sup>j</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

t 60, Subpart H) (Renewal)

(E) Technical person- hours per year (E = C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per year <sup>b</sup>
53	2.65	5.3	\$7,220.72
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
4,240	212	424	\$577,657.60
<b>4,937</b>			<b>\$584,878</b>
4637.5	231.88	463.75	\$631,813.00
2782.5	139.13	278.25	\$379,087.80
<b>8,533</b>			<b>\$1,010,901</b>
<b>13,500</b>			<b>\$1,600,000</b>
			<b>\$309,000</b>
<b>13,500</b>			<b>\$1,900,000</b>

Labor Rates	
Management	\$149.84
Technical	\$122.66
Clerical	\$60.88

Responses	106
Hours/response	127

ming subject to the rule over the next three years.  
 ; are from the United States Department of Labor, Bureau of  
 column 1, "Total compensation." They have been increased by

al of  $3 \times 350 = 1,050$  times per year.

**Table 2: Average Annual EPA Burden and Cost - NSPS for Sulfuric Acid Plants (40 CFR Part 60, )**

Activity	(A)	(B)	(C)	(D)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>
New facility				
Initial performance test <sup>c</sup>	50	1	50	0
Repeat performance test/observed <sup>d</sup>	24	1	24	0
Review reports				
Notification of construction	2	1	2	0
Notification of actual startup	0.5	1	0.5	0
Notification of initial test	0.5	1.2	0.6	0
Review test results	8	1.2	9.6	0
Notification of CMS demonstration	0.5	1	0.5	0
Existing facility	0.5	1	0.5	0
Excess emission reports <sup>e</sup>	4	2	8	53
<b>TOTAL (rounded)<sup>f</sup></b>				

**Assumptions:**

- <sup>a</sup> We have assumed that there are approximately 53 respondents, with no additional new or reconstructed sources becoming sul
- <sup>b</sup> This ICR uses the following labor rates: \$51.23 (technical), \$69.04 (managerial), and \$27.73 (clerical). These rates are from Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit package:
- <sup>c</sup> We have assumed that it will take fifty hours for Agency observation of the initial performance test.
- <sup>d</sup> We have assumed that it will take twenty-four hours for Agency observation of a repeat of the performance test due to failure
- <sup>e</sup> We have assumed that it will take four hours, twice per year, to review the excess emission reports.
- <sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Subpart H) (Renewal)**

<b>(E)</b>	<b>(F)</b>	<b>(G)</b>	<b>(H)</b>
<b>Technical person- hours per year (E=CxD)</b>	<b>Management person-hours per year (Ex0.05)</b>	<b>Clerical person-hours per year (Ex0.1)</b>	<b>Cost, \$<sup>b</sup></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	0	\$0
0	0	0	\$0
424	21.2	42.4	\$24,360.92
488			\$24,400

<b>Labor Rates</b>	
Management	\$69.04
Technical	\$51.23
Clerical	\$27.73

bject to the rule over the next three years.

the Office of Personnel Management (OPM), 2021 General  
s available to government employees.

!:

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent <sup>a</sup>	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent <sup>a</sup>	Number of Respondents with O&M	Total O&M, (ExF)
CMS	\$155,703	0	\$0	\$5,839	53	\$309,459
SO <sub>2</sub> testing	\$10,380	0	\$0			
<b>Total</b>			<b>\$0</b>			<b>\$309,000</b>

a Capital/Startup and Annual O&M costs have been updated from 2005 to 2019 using the CEPCI Index.

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents <sup>a</sup>	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
1	0	53	0	0	53
2	0	53	0	0	53
3	0	53	0	0	53
<b>Average</b>	<b>0</b>	<b>53</b>	<b>0</b>	<b>0</b>	<b>53</b>

<b>Total Annual Responses</b>				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Notification of construction or modification	0	1	N/A	0
Notification of actual startup	0	1	N/A	0

Notification of physical or operational change	0	1	N/A	0
Notification of demonstration of CMS	0	1	N/A	0
Notification of initial performance test	0	1	N/A	0
Semiannual report of excess emissions	53	2	N/A	106
			<b>Total</b>	<b>106</b>



CEPCI Index	
Year	Index
2005	468.2
2019	607.5