

### Number of Respondents

Year	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A) Number of New Respondents	(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	1	19	0	1	19
2	1	19	0	1	19
3	1	19	0	1	19
Average	1	19	0	1	19

### 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	1	0	0
Notification of applicability	0	1	0	0
Notification of anticipated startup	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of process changes	1	1	0	1
Pre-compliance plan	1	1	0	1
Notification of initial performance test	1	1	0	1
Notification of initial CMS performance evaluation	1	1	0	1
CMS evaluation with performance test	0.9	1	0	0.9
CMS evaluation without performance test	0.1	1	0	0.1
Semiannual report	17	2	0	34
Quarterly report	2	4	0	8
Emissions averaging plan	2	1	0	2
			Total	49

**Table 1: Annual Respondent Burden and Cost – NESHAP for Pesticide Active Ingredient Production (40 CFR Part 63, Subpart MMM) (Renewal)**

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual Cost (\$) <sup>b</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarization with Regulatory Requirements	2	1	2	19	38	2	4	\$5,169.08
B. Required activities								
Performance evaluation test (CMS certification)	13	6	78	1	78	4	8	\$10,610
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
Notification and application of construction/reconstruction <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of applicability <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of anticipated startup <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of actual startup <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of process changes <sup>d</sup>	8	1	8	1	8	0.4	0.8	\$1,088.23
Pre-compliance report <sup>c</sup>	40	1	40	1	40	2	4	\$5,441
Notification of initial performance test <sup>c</sup>	2	1	2	1	2	0	0	\$272
Notification of initial CMS performance evaluation <sup>c</sup>	2	1	2	1	2	0	0	\$272
CMS evaluation with performance test <sup>e</sup>	80	1	80	0.9	72	4	7	\$9,794
CMS evaluation without performance test <sup>e, f</sup>	120	1	120	0.1	12	1	1	\$1,632
Periodic reporting								
Semiannual report <sup>g</sup>	8	2	16	17	272	13.6	27.2	\$36,999.75
Quarterly report <sup>h</sup>	24	4	96	2	192	9.6	19.2	\$26,117.47
Emissions averaging plan <sup>i</sup>	40	1	40	2	80	4	8	\$10,882.28
PRD reporting <sup>k</sup>	5.5	2	11	19	209	10.5	20.9	\$28,429.96
LDAR reporting <sup>k</sup>	94	2	188	19	3,572	178.6	357.2	\$485,893.80
<b>Subtotal for Reporting Requirements</b>						<b>5,264</b>		<b>\$622,602</b>
4. Recordkeeping requirements								
A. Familiarization with Regulatory Requirements	See 3A							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system <sup>c</sup>	40	1	40	1	40	2	4	\$5,441
E. Develop QA/QC plan for CMS <sup>c</sup>	40	1	40	1	40	2	4	\$5,441
F. Time to enter information								
Records of excess emissions	1.5	52	78	1	78	4	8	\$10,610
Records of CMS data								
Record continuously monitored parameters <sup>j</sup>	1	320	320	19	6,080	304	608	\$827,053.28
Enter/verify information for periodic report	16	2	32	19	608	30.4	60.8	\$82,705.33
G. CMS calibration <sup>c</sup>	48	1	48	1	48	2	5	\$6,529
H. Train personnel <sup>c</sup>	40	1	40	1	40	2	4	\$5,441
I. Audits	N/A							

<i>Subtotal for Recordkeeping Requirements</i>					7,974	\$943,000
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED)<sup>1</sup></b>					<b>13,200</b>	<b>\$1,570,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>1</sup></b>						<b>\$339,000</b>
<b>GRAND TOTAL (rounded)<sup>1</sup></b>						<b>\$1,910,000</b>

269 hrs/resp

a On average, EPA estimates 19 existing sources will be subject to the NESHAP. No new sources will become subject to the standard over the three-year period of this ICR.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Pesticide Active Ingredient Production (40 CFR Part 63, Subpart MMM) (Renewal)**

	A	B	C	D	E	F	G	H
Burden item	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>				
(A)	(B)	(C)	(D)	(E)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents <sup>a</sup>	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent
PRD Electronic Indicators <sup>b</sup>	\$11,632	1	\$11,632	\$2,825
Performance Tests	\$52,200	1	\$52,200	\$0
Process Vents CMS <sup>c</sup>	\$15,920	1	\$15,920	\$1,220
Wastewater CMS <sup>d</sup>	\$10,690	1	\$10,690	\$9,038
<b>Total (rounded)</b>			<b>\$90,400</b>	

<sup>a</sup> On average, EPA estimates 19 existing sources will be subject to the NESHAP and no new sources will be added over the three-year period of this ICR. However, based on comments received from Corteva, we assume that Corteva will install a new process unit.

<sup>b</sup> Based on comments received from Corteva, we assume a cost of \$2,825 annually per respondent for a

<sup>c</sup> Based on comments received from Corteva, we assume approximately 10 hours of technical labor for instrumentation, and calibrations, or \$1,220 per respondent annually.

<sup>d</sup> Based on comments received from Corteva, we assume a cost of \$9,038 annually per respondent for the treatment device and associated control devices and operating parameters.

<b>Costs</b>	
(F)	(G)
Number of Respondents with O&M	Total O&M, (E X F)
19	\$53,675
0	\$0
19	\$23,180
19	\$171,722
	<b>\$249,000</b>

\$339,000

will become subject to the standard  
 of one existing source per year

annual PRD monitoring.

programming time, correct

calibration and maintenance for