

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 an average of 13 respondents that will be subject to the rule, and there will be no addition to this ICR.

^b This ICR uses the following labor rates: Managerial \$153.55 (\$73.12+ 110%); Technical \$122.20 (\$58.19 + 110%). The States Department of Labor, Bureau of Labor Statistics, March 2021, “Table 2. Civilian Workers, by occupation and hours, 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 will submit notifications of operational changes.

^h We assume that each source will submit a semiannual report due to excess emission and monitoring systems]

ⁱ Sources are required to maintain a daily record of operating parameters (e.g., determine equivalent P_2O_5 content). Plant operation is 350 days per year as specified in the NSPS review document.

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

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	\$1,768.37
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	\$544.11
13	52	2.6	5.2	\$7,073.48
		79		\$9,386
13	1,138	57	114	\$154,732.42
		1,308		\$154,732
		1,390		\$164,000
				\$320,000
				\$484,000

Labor Rat
Management
Technical
Clerical

ional new sources that will become subject to the rule over the three-year period of

110%); and Clerical \$61.51 (\$29.29 + 110%). These rates are from the United
national and industry group.” The rates are from column 1, “Total compensation.” The
private industry. This ICR assumes that Managerial hours are 5 percent of Technical

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

applicable test method. Each run shall be conducted for the time and under the
rate of the effluent gas shall be determined by Method 13 which requires a
is 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.

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

es
\$153.55
\$122.20
\$61.51

hrs/response

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			
Review notification of operational change ^c	0.5	1	2
Semiannual report ^d	1	2	2
TOTAL COST (rounded) ^e			

Assumptions:

^a We have assumed that an average of 13 respondents that will be subject to the rule, and there will be no additional r

^b This cost is based on the average hourly labor rate as follows: Managerial \$69.04 (GS-13, Step 5, \$43.15 + 60%); T \$17.33 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours (OPM), 2021 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to

^c We have assumed that it will take 0.5 hours twice per year to review the notification of operational change.

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

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

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
2	4	0.2	0.4	\$229.82
13	26	1.3	2.6	\$1,493.83
		35		\$1,720

Labor R
Management
Technical
Clerical

new sources that will become subject to the rule over the three-year period of this ICR.

Technical \$51.23 (GS-12, Step 1, \$32.02 + 60%); and Clerical \$27.73 (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.

ates
\$69.04
\$51.23
\$27.73

Capital/Startup vs. Operation and Maintenance (O&M) Costs					
(A)	(B)	(C)	(D)	(E)	(F)
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
Pressure drop monitor	\$27,720	0	\$0	\$24,630	13
TOTAL ^a					

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents ^a	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	13	0	0	13
2	0	13	0	0	13
3	0	13	0	0	13
Average	0	13	0	0	13

^a New respondents include sources with constructed, reconstructed and modified affected facilities.

Total Annual Responses				
(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 Operational Change	2	1	N/A	2
Semiannual Report	13	2	N/A	26
			Total	28

(G)
Total O&M, (E x F)
\$320,190
\$320,000