ICR Summary Information	
Hours per Response	52
Number of Respondents	13
Total Estimated Burden Hours	2,200
Total Estimated Costs	$463,000
Annualized Capital O&M	$199,000
Total Annual Responses	43
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NESHAP for Phosphoric Acid Manufactu

Burden item	(A) Technical Hours per Occurrence	(B) Occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting Requirements			
A. Familiarize with regulatory requirements [c]	4	1	4
B. Required activities			
Initial performance test	28	1	28
Repeat initial performance test	28	0.1	2.8
Startup, shutdown, malfunction plan	40	1	40
Annual performance test	28	1	28
Repeat annual performance test [d]	28	0.2	5.6
Mercury testing - Calciners [e]	10	1	10
TF testing			
a. Oxidation Reactors [f]	10	1	10
b. Calciners [e]	10	1	10
C. Create information	See 3B		
D. Gather existing information	See 3B		
E. Write report			
Notification of applicability	N/A		
Notification of construction./ reconstruction	2	1	2
Notification of actual startup	N/A		
Notification of compliance requirements	N/A		
Notification of performance test	2	1	2
Notification of compliance status	4	1	4
Report of performance test	see 3B		
Report monitoring exceedances [g]	16	4	64
Report of no excess emissions [h]	8	2	16
Startup/ shutdown/ malfunction report [i]	8	1	8
Develop monitoring plan [j]	15	1	15
Prepare gypsum stack management [j]	20	1	20
Subtotal for Reporting			
4. Recordkeeping Requirements			
A. Familiarize with regulatory requirements	See 3A		
B. Plan activities	See 4E		
C. Implement activities	See 4E		
D. Develop record system	See 4E		
E. Time to enter information			
Records of operating parameters [k]	1.5	52	78
Records of Hg testing [e]	3	1	3

Records of TF testing [e, f]	3	1	3
Records of BLDS alarm [l]	5	1	5
F. Time to train personnel	See 3B		
G. Time to comply with applicable requirements	See 3B		
H. Time for audits	N/A		
Subtotal for Recordkeeping			
TOTAL ANNUAL BURDEN and COST (rounded) [m]			
CAPITAL AND O&M COST (rounded) [m]			
GRAND TOTAL (rounded) [m]			

Assumptions

[a] Based on data collected during the 2020 final rule and consultation with internal agency experts, we estimate that 12 phospho located at 13 facilities will be subject to the rule. No additional respondents will become subject the rule over the three-year per

[b] This ICR uses the following labor rates: Managerial $157.61 ($75.05+ 110%); Technical $123.94 ($59.02 + 110%); and Cler Department of Labor, Bureau of Labor Statistics, September 2021, "Table 2. Civilian Workers, by occupational and industry gr increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employing w with hiring, training, and equipping their employees.

[c] We assume that all respondents will have to familiarize with the regulatory requirements each year.

[d] We have assumed that 7 percent of respondents will fail the performance test and must repeat it.

[e] Based on the 2015 RTR and 2020 final rule, we estimate there are 6 phosphate rock calciners that are subject to Hg and TF te

[f] Based on the 2015 RTR and 2020 final rule, we estimate there are 3 oxidation reactors subject to TF testing.

[g] We have assumed that 10 percent of sources will report exceedances. Respondents are required to report quarterly.

[h] We have assumed that 90 percent of sources will report no excess emissions semiannually.

[i] No longer applies.

[j] This is a one-time activity from the 2015 final rule. We assume the burden was already incurred during the first year of the am

[k] We have assumed that it will take 1.5 hours per respondent to enter information and that information is entered one-time per

[l] Records of BLDS alarms must be kept, we assume each fabric filter will warrant 5 hours of documenting for this requirement

[m] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ıuring and Phosphate Fertilizers Production (40 CFR Part 63, Subparts AA and BB) (Renewal)

123.94 157.61 62.52

(D) Respondents per year [a]	(E) Technical person hours per year (E=CxD)	(F) Managerial person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost per Year ($) [b]
13	52	2.6	5.2	$7,179.77
0	0	0	0	$0
0	0	0	0	$0
0	0	0	0	$0
13	364	18.2	36.4	$50,258.39
0.91	5.10	0.25	0.5	$703.62
6	60	3	6	$8,284.35
3	30	1.5	3	$4,142.18
6	60	3	6	$8,284.35
0	0	0	0	$0
0	0	0	0	$0
0	0	0	0	$0
1.3	83.2	4.16	8.32	$11,487.63
11.7	187.2	9.36	18.72	$25,847.17
0	0	0	0	$0
0	0	0	0	$0
0	0	0	0	$0
	968			**$116,187**
13	1014	50.7	101.4	$140,005.52
6	18	0.9	1.8	$2,485.31

9	27	1.35	2.7	$3,727.96
3	15	0.75	1.5	$2,071.09
	1,235			**$148,290**
	2,200			**$264,000**
				$199,000
				$463,000

2,200
52 hr/response

ric acid units and 11 phosphate fertilizers, for a total of 23 processing units,
iod of this ICR.

ical $62.52 ($29.77 + 110%). These rates are from the United States
oup." The rates are from column 1, "Total compensation." The rates have been
orkers beyond their wages and benefits, including business expenses associated

sting.

endment.

week for 52 weeks per year.

.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Phosphoric Acid Manufacturing and Ph

52.37

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year [a]	(E) Technical person hours per year (E=CxD)
Initial performance test	40	1	40	0	0
Repeat initial performance test					
Retesting preparation	8	1	8	0	0
Retesting	40	1	40	0	0
Excess emissions enforcement activities	N/A				
Report review					
Notification of applicability	2	1	2	0	0
Notification of construction./reconstruction	N/A				
Notification of anticipated startup	N/A				
Notification of actual startup	N/A				
Notification of special compliance requirements	N/A				
Notification of initial performance test	2	1	2	0	0
Notification of compliance status	2	1	2	0	0
Observe stack tests [c]	20	1	20	3	60
Annual performance test	40	1	40	13	520
Repeat annual performance test [d]	40	1	40	0.91	36.4
Excess emissions report [e]	20	4	80	1.3	104
No excess emissions report [f]	20	2	40	11.7	468
Review monitoring plan [g]	10	1	10	0	0
Review gypsum stack and cooling pond management plan [g]	8	1	8	0	0
Waiver application	N/A				
Startup, shutdown, malfunction report [h]	20	1	20	0	0
TOTAL ANNUAL BURDEN AND COST (rounded) [i]					

Assumptions

[a] Based on data collected during the 2020 final rule and consultation with internal agency experts, we estimate that 12 phosphoric acid u processing units, located at 13 facilities will be subject to the rule. No additional respondents will become subject the rule over the three

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overh Step 5, $44.10 + 60%), Technical rate of $52.37 (GS-12, Step 1, $32.73 + 60%), and Clerical rate of $28.34 (GS-6, Step 3, $17.71 + 60% Management (OPM) “2022 General Schedule” which excludes locality rates of pay.

[c] Assumes EPA will attend 20 percent of stack tests. Only considers facilities with new emission points.

[d] We have assumed that 7 percent of respondents will fail the initial performance test and must repeat it.

e We have assumed that 10 percent of respondent will report exceedances. Respondents are required to report quarterly.

[f] We have assumed that 90 percent of existing respondents report no excess emissions semiannually.

[g] This is a one-time activity. We assume the burden was already incurred during the first year of the amendment.

[h] No longer applies.

[i] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ɔsphate Fertilizers Production (40 CFR Part 63, Subparts AA and BB) (Renewal)

70.56 28.34

(F) Managerial person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost per Year ($) [b]
0	0	$0
0	0	$0
0	0	$0
0	0	$0
0	0	$0
0	0	$0
3	6	$3,523.92
26	52	$30,540.64
1.82	3.64	$2,137.84
5.2	10.4	$6,108.13
23.4	46.8	$27,486.58
0	0	$0
0	0	$0
0	0	$0.00
1,370		**$69,800**

ınits and 11 phosphate fertilizers, for a total of 23
-year period of this ICR.

ead expenses: Managerial rate of $70.56 (GS-13,
%). These rates are from the Office of Personnel

Capital/Startup vs. Operation and Maintenance (O&M) Costs					
(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent[e]	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent[e]	Number of Respondents with O&M
Temperature monitoring device	$2,891	0	$0	$949	13
Mercury testing[a]	$0	0	$0	$8,566	6
TF testing[a,b]	$0	0	$0	$5,996	9
Performance evaluation[c]	$0	0	$0	$2,142	23
BLDS alarm[d]	$26,983	0	$0	$10,601	3
Total[f]			**$0**		

[a] Based on the 2015 RTR, we estimate there are 6 phosphate rock calciners that are subject to Hg and TF testing.

[b] Based on the 2015 RTR, we estimate there are 3 oxidation reactors subject to TF testing.

[c] Facilities must follow performance evaluation criteria (calibrations) for control devices. There are 23 process units at the

[d] Based on the 2015 RTR, we estimate there are 3 BLDS alarms. We assumed capital costs were incurred during the first y

[e] Costs have been adjusted from $2015 to $2020 using the annual Chemical Engineering Plant Cost Index (CEPCI).

[f] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

(G)
Total O&M, (E X F)
$12,333
$51,397
$53,966
$49,255
$31,802
$199,000

13 facilities.

'ear of the

2015 --> 2020 (CEPCI): 1.0708

2015 $	2020 $
(B)	(B)
Capital/Startup Cost for One Respondent	Capital/Startup Cost for One Respondent
$2,700	$2,891
$0	$0
$0	$0
$0	$0
$25,200	$26,983

2015 $	2020 $
(E)	(E)
Annual O&M Costs for One Respondent	Annual O&M Costs for One Respondent
$886	$949
$8,000	$8,566
$5,600	$5,996
$2,000	$2,142
$9,900	$10,601

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 construction/reconstruction	0	0	0	0
Notification of initial performance test	0	0	0	0
Notification of compliance status	0	0	0	0
Annual performance test report	13.9	1	0	13.9
Quarterly reports of excess emissions	1.3	4	0	5.2
Semiannual report of no excess emissions	11.7	2	N/A	23.4
			Total	**43**

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
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
1	0	13	0	0
2	0	13	0	0
3	0	13	0	0
Average	0	13	0	0

[a] New respondents include sources with constructed and reconstructed affected facilities.

(E)
Number of Respondents (E=A+B+C-D)
13
13
13
13