

### ICR Summary Information

Hours per Response	52
Number of Respondents	35
Total Estimated Burden Hours	2,840
Total Estimated Costs	\$4,690,000
Annualized Capital O&M	\$4,330,000
Total Annual Responses	55
Form Number	Not Applicable

**Table 1: Annual Respondent Burden and Cost – NSPS for Nitric Acid Plants (40 CFR Part 60, Sub**

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=AxB)	(D) Number of Respondents per Year <sup>a</sup>
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
<b>Sources Constructed or Modified after 10/14/2011 – Subpart Ga</b>				
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	11
B. Required Activities				
Initial performance test	180	1	180	1.2
Demonstration of CERMS	180	1	180	1.2
Repeat performance test <sup>d</sup>	180	1	180	0.24
Daily monitoring of CERMS	0.5	330	165	1.2
C. Create Information	See 3B			
D. Gather Existing Information	See 3E			
E. Write Report				
Notification of construction/reconstruction	2	1	2	1.2
Notification of actual startup	2	1	2	1.2
Notification of initial performance test	2	1	2	1.2
Notification of demonstration of CERMS	2	1	2	1.2
Report of performance test	2	1	2	1.2
Report of noncompliance with NOX emission standard <sup>e</sup>	2	1	2	1.1
<b>Subtotal for Reporting Requirements - Subpart Ga</b>				
<b>Existing Sources – Subpart G</b>				
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	24
B. Write Report				
Notification of physical/operational changes <sup>f</sup>	See 3E			
Semiannual reports <sup>g</sup>	8	2	16	24
<b>Subtotal for Reporting Requirements- Subpart G</b>				
<b>Total Reporting Requirements for Subparts G and Ga</b>				
4. Recordkeeping Requirements				
A. Familiarize with regulatory requirements	See 3A			
B. Plan activities	See 3B			
C. Implement activities	See 3B			
D. Develop record system	N/A			
<b>Subpart Ga: Sources Constructed or Modified after 10/14/2011</b>				
E. Time to Enter Information				
Records of noncompliance <sup>e</sup>	0.5	1	0.5	1.1
Daily production and flow rates	8	1	8	11
Data collection	0.13	330	41.25	11
Records of occurrence of startup, shutdown and malfunctions	8	1	8	11
F. Time to Train Personnel				
Train personnel for CERMS maintenance	16	2	32	11

<b>Subtotal for Recordkeeping Requirements - Subpart Ga</b>				
<b>Subpart G: Existing Sources</b>				
E. Time to Enter Information				
Records of daily production rates and hours of operation	8	1	8	24
Records of occurrence of startup, shutdown and malfunctions	8	1	8	24
Records of performance test data	80	1	80	0
G. Audits	N/A			
<b>Subtotal for Recordkeeping Requirements - Subpart G</b>				
<b>Total Recordkeeping Requirements for Subparts G and Ga</b>				
<b>Total Labor Burden and Cost for Subpart Ga (rounded)<sup>h</sup></b>				
<b>Total Labor Burden and Cost for Subpart G (rounded)<sup>h</sup></b>				
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>h</sup></b>				
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>h</sup></b>				
<b>GRAND TOTAL (rounded)<sup>h</sup></b>				

### Assumptions

- <sup>a</sup> We have assumed there are approximately 35 respondents (24 subject to Subpart G and 11 subject to Subpart Ga), with 1.2 respondents per year over the next three years.
- <sup>b</sup> This ICR uses the following labor rates: \$130.28 for technical, \$163.17 for managerial, and \$65.71 for clerical labor. These rates are based on the Bureau of Labor Statistics, September 2022, "Table 2. Civilian Workers, by occupational and industry group." The rates have been increased by 110 percent to account for varying industry wage rates and the additional overhead business costs, including business expenses associated with hiring, training, and equipping their employees.
- <sup>c</sup> We have assumed that each respondent will have to familiarize with regulatory requirements each year.
- <sup>d</sup> We assume that 20% of sources will have to repeat performance tests.
- <sup>e</sup> We assume 10% of sources will report non-compliance.
- <sup>f</sup> We assume 1 existing facility will be reconstructed or modified over the next 5 years (0.2 respondents per year).
- <sup>g</sup> We assume it will take 8 hours to write semiannual reports.
- <sup>h</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Parts G and Ga) (Renewal)**

130.28      163.17      65.71

(E) Technical Hours per Year (E=CxD)	(F) Management Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Total Labor Costs per Year, <sup>b</sup>
11	0.55	1.1	\$1,595.10
216	10.8	21.6	\$31,322.05
216	10.8	21.6	\$31,322.05
43.2	2.16	4.32	\$6,264.41
198	9.9	19.8	\$28,711.88
2.4	0.12	0.24	\$348.02
2.4	0.12	0.24	\$348.02
2.4	0.12	0.24	\$348.02
2.4	0.12	0.24	\$348.02
2.4	0.12	0.24	\$348.02
2.2	0.11	0.22	\$319.02
<b>803</b>			<b>\$101,275</b>
24	1.2	2.4	\$3,480.23
384	19.2	38.4	\$55,683.65
<b>469</b>			<b>\$59,164</b>
<b>1,270</b>			<b>\$160,000</b>
0.55	0.03	0.06	\$79.76
88	4.4	8.8	\$12,760.84
453.75	22.69	45.38	\$65,798.06
88	4.4	8.8	\$12,760.84
352	17.6	35.2	\$51,043.34

<b>1130</b>			<b>\$142,443</b>
192	9.6	19.2	\$27,841.82
192	9.6	19.2	\$27,841.82
0	0	0	\$0
<b>442</b>			<b>\$55,684</b>
<b>1571</b>			<b>\$198,100</b>
<b>1,930</b>			<b>\$244,000</b>
<b>911</b>			<b>\$115,000</b>
<b>2,840</b>			<b>\$359,000</b>
			<b>\$4,330,000</b>
			<b>\$4,690,000</b>

52 hrs per response

new sources per year becoming subject to the rule

rates are from the United States Department of  
 es are from column 1, "Total compensation." The  
 s of employing workers beyond their wages and

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

54.51

Burden Item	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Respondent per Year (C=AxB)	(D) Number of Respondents per Year <sup>a</sup>	(E) Technical Hours per Year (E=CxD)
<b>Subpart Ga<sup>a</sup></b>					
Required Activities					
Observe initial performance test	24	1	24	1.2	28.8
Repeat performance test <sup>c</sup>	24	0.2	4.8	0.24	1.15
Report Review					0
Notification of construction/reconstruction	2	1	2	1.2	2.4
Notification of actual startup	0.5	1	0.5	1.2	0.6
Notification of initial performance test	0.5	1	0.5	1.2	0.6
Review test results	8	1	8	1.2	9.6
Review test NOX noncompliance reports <sup>d</sup>	8	1	8	1.1	8.8
<b>Subtotal for Subpart Ga</b>					
<b>Subpart G</b>					
Report Review					
Semiannual reports <sup>a</sup>	2	2	4	24	96
<b>Subtotal for Subpart G</b>					
<b>TOTAL ANNUAL BURDEN and COST (rounded)<sup>e</sup></b>					

**Assumptions**

a We have assumed there are approximately 35 respondents (24 subject to Subpart G and 11 subject to Subpart Ga), with 1 subject to the rule over the next three years.

b This ICR uses the following average hourly labor rates: \$73.46 for managerial (GS-13, Step 5, \$45.91 + 60%), \$54.51 (G technical and \$29.50 (GS-6, Step 3, \$18.44 + 60%) for clerical. These rates are from the Office of Personnel Management which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available.

c We assume that 20% of new sources will have to repeat performance tests.

d We assume 10% of sources will report non-compliance.

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

**Subparts G and Ga) (Renewal)**

73.46      29.50

(F) Managem ent Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Total Labor Costs per Year, <sup>b</sup>
1.44	2.88	\$1,760.63
0.06	0.12	\$70.43
0	0	\$0.00
0.12	0.24	\$146.72
0.03	0.06	\$36.68
0.03	0.06	\$36.68
0.48	0.96	\$586.88
0.44	0.88	\$537.97
<b>60</b>		<b>\$3,176</b>
4.8	9.6	\$5,868.77
<b>110</b>		<b>\$5,870</b>
<b>170</b>		<b>\$9,050</b>

.2 new sources per year becoming

S-12, Step 1, \$34.07 + 60%) for (OPM), 2023 General Schedule, able to government employees.

<b>Capital/Startup vs. Operation and Maintenance</b>			
<b>(A)</b>	<b>(B)</b>	<b>(C)</b>	<b>(D)</b>
<b>Continuous Monitoring Device</b>	<b>Capital/Startup Cost for One Respondent<sup>d</sup></b>	<b>Number of New Respondents</b>	<b>Total Capital/Startup Cost, (B X C)</b>
<b>Subpart G</b>			
NOx CMS	\$105,611	0	\$0
<b>Subpart Ga</b>			
NOx CERMS <sup>a,b</sup>	\$163,226	1.2	\$195,871
CERMS testing	\$21,603	1.2	\$25,924
Flow meter testing	\$8,960	1.2	\$10,752
File cabinets	\$1,126	1.2	\$1,352
<b>Totals (rounded)<sup>c</sup></b>			<b>\$234,000</b>

<sup>a</sup> We estimate an annual capital cost of \$163,226 for NOx CERMS and \$1,126 for file cabinets for all respondent capital cost by 1.2 new respondents.

<sup>b</sup> On average over the three-year period of this ICR, we estimate an average 11 respondents per year will be subject to testing.

<sup>c</sup> Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

<sup>d</sup> Costs have been updated to 2022 \$ using the CEPCI Equipment Cost Index.



<b>(O&amp;M) Costs</b>		
<b>(E)</b>	<b>(F)</b>	<b>(G)</b>
<b>Annual O&amp;M Costs for One Respondent <sup>d</sup></b>	<b>Number of Respondents with O&amp;M</b>	<b>Total O&amp;M, (E X F)</b>
\$155,310	24	\$3,727,446
\$33,785	11	\$371,635
NA	0	NA
NA	0	NA
NA	0	NA
		<b>\$4,100,000</b>

\$4,330,000

lents. The capital cost per respondent is calculated by dividing the total

subject to Subpart Ga (a growth rate of 1.2 respondents per year).

816 2022 CE Index Value

567.3 2013 CE Index Value

525.4 2007 CE Index Value

<b>Number of Respondents</b>				
	<b>Respondents That Submit Reports</b>		<b>Respondents That Do Not Submit Any Reports</b>	
	<b>(A)</b>	<b>(B)</b>	<b>(C)</b>	<b>(D)</b>
<b>Year</b>	<b>Number of New Respondents <sup>a</sup></b>	<b>Number of Existing Respondents</b>	<b>Number of Existing Respondents that keep records but do not submit reports</b>	<b>Number of Existing Respondents That Are Also New Respondents</b>
1	1.2	33	0	0.2
2	1.2	34	0	0.2
3	1.2	35	0	0.2
Average	1.2	34	0	0

<sup>a</sup> New respondents include sources with constructed, reconstructed and modified affected facilities. In this standard existing initial notifications.

<b>(E)</b>
<b>Number of Respondents (E=A+B+C-D)</b>
34
35
36
<b>35</b>

g respondents submit

<b>Total Annual Responses</b>				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents <sup>a</sup>	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
<b>Subpart Ga</b>				
Notification of construction/reconstruction	1.2	1	0	1.2
Notification of actual startup	1.2	1	0	1.2
Notification of initial performance test	1.2	1	0	1.2
Notification of CERMS demonstration	1.2	1	0	1.2
Report of performance test	1.2	1	0	1.2
Report of noncompliance with NOx emission standard	1.1	1	0	1.1
<b>Subpart G</b>				
Notification of physical/operational changes	0	1	0	0
Semiannual reports	24	2	0	48
			<b>Total</b>	<b>55</b>