

**ICR Summary Information**

Hours Per Response	269
Number of Respondents	19
Total Estimated Burden Hours	13,200
Total Estimated Costs	\$2,150,000
Annualized Capital O&M	\$339,000
Form Number	N/A

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

Burden item	A Person-hours per occurrence	B Annual occurrences per respondent	C Person-hours per respondent per year (AxB)	D Respondents per year <sup>a</sup>	E Technical hours per year (Cx D)	F Management hours per year (Ex0.05)	G Clerical hours per year (Ex0.10)	H 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	\$5,985.25
B. Required activities								
Performance evaluation test (CMS certification)	13	6	78	1	78	4	8	\$12,286
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	\$1,260.05
Pre-compliance report <sup>c</sup>	40	1	40	1	40	2	4	\$6,300
Notification of initial performance test <sup>c</sup>	2	1	2	1	2	0.10	0.20	\$315
Notification of repeat performance test <sup>c</sup>	2	1	2	0.1	0.10	0.01	0.01	\$16
Notification of initial CMS performance evaluation <sup>c</sup>	2	1	2	1	2	0	0	\$315
CMS evaluation with performance test <sup>c, e</sup>	80	1	80	0.9	72	4	7	\$11,340
CMS evaluation without performance test <sup>c, f</sup>	120	1	120	0.1	12	1	1	\$1,890
Periodic reporting								
Semiannual report <sup>g</sup>	8	2	16	17	272	13.6	27.2	\$42,841.77
Quarterly report <sup>h</sup>	24	4	96	2	192	9.6	19.2	\$30,241.25
Emissions averaging plan <sup>i</sup>	40	1	40	2	80	4	8	\$12,600.52
PRD reporting <sup>k</sup>	5.5	2	11	19	209	10.5	20.9	\$32,918.86
LDAR reporting <sup>k</sup>	94	2	188	19	3,572	178.6	357.2	\$562,613.22
<b>Subtotal for Reporting Requirements</b>					<b>5,264</b>			<b>\$720,923</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	\$6,300
E. Develop QA/QC plan for CMS <sup>c</sup>	40	1	40	1	40	2	4	\$6,300
F. Time to enter information								
Records of excess emissions	1.5	52	78	1	78	4	8	\$12,286
Records of CMS data								
Record continuously monitored parameters <sup>j</sup>	1	320	320	19	6,080	304	608	\$957,639.52
Enter/verify information for periodic report	16	2	32	19	608	30.4	60.8	\$95,763.95

G. CMS calibration <sup>c</sup>	48	1	48	1	48	2	5	\$7,560
H. Train personnel <sup>c</sup>	40	1	40	1	40	2	4	\$6,300
I. Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>					<b>7,974</b>			<b>\$1,092,000</b>
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED)<sup>i</sup></b>					<b>13,200</b>			<b>\$1,810,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>i</sup></b>								<b>\$339,000</b>
<b>GRAND TOTAL (rounded)<sup>i</sup></b>								<b>\$2,150,000</b>

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<sup>a</sup> 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. However, based on comments received from Corteva, we assume one existing source per year will install a new process unit.

**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 become three-year period of this ICR. However, based on previous comments received from Corteva, we assume one exist new process unit.

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

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

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

(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>
TOTAL	
	<b>\$339,000</b>

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Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>a</sup>	(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

<sup>a</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

<b>Total Annual Responses</b>				
(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 report	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