

TABLE X.A—1.—TOTAL AND AVERAGE COMPLIANCE COSTS BY SUBCATEGORY AND OPTION—Continued

Option	Total costs (\$000)			Average costs (\$000)		
	Capital	Post-tax annualized	Pre-tax annualized	Capital	Post-tax annualized	Pre-tax annualized
Option 4	104,090	31,418	47,627	2,669.0	805.6	1,221.2
Subcategory K (118 facilities)						
Option 2	18,856	6,656	8,333	159.8	56.4	70.6
Option 2.5	74,219	13,321	16,329	629.0	112.9	138.4
Option 2 + P	65,644	29,683	38,999	556.3	251.6	330.5
Option 2.5 + P	99,509	34,743	45,492	843.3	294.4	385.5
Option 4	299,178	65,400	83,368	2,535.4	554.2	706.5

b. National Loadings

Table X.A–2 shows estimated pollutant reductions for each treatment option. The conventional pollutant loadings (*i.e.* 5-Day Biological Oxygen

Demand, Total Suspended Solids and Oil and Grease) removed for Options 2, 2+P, 2.5 and 2.5+P are identical for Subcategories A through D and Subcategory K, respectively. Options 2+P, 2.5 and 2.5+P represent additional

removals of nutrients, not conventional pollutants, over Option 2. Option 4 provides additional removals of both nutrients and conventional pollutants relative to other options.

TABLE X.A–2.—REMOVAL OF SPECIFIED POLLUTANTS BY SUBCATEGORY AND OPTION ¹

Subcategory	Pollutant	Removals (pounds per year)				
		Option 2	Option 2.5	Option 2+P	Option 2.5+P	Option 4
A through D	5-Day Biochemical Oxygen Demand.	755,213	755,213	755,213	755,213	795,121
	Total Suspended Solids	1,058,991	1,058,991	1,058,991	1,058,991	1,236,504
	Chemical Oxygen Demand	0	0	0	0	0
	Carbonaceous Biochemical Oxygen Demand.	633,168	633,168	633,168	633,168	633,168
	Ammonia as Nitrogen	2,717,147	2,717,147	2,717,147	2,717,147	2,789,738
	Total Nitrogen	0	27,688,678	0	27,688,678	31,331,318
	Total Phosphorus	0	0	5,128,793	5,128,793	5,659,799
	Nitrate/Nitrite	0	26,910,414	0	26,910,414	28,762,544
	Total Kjeldahl Nitrogen	2,669,042	2,669,042	2,669,042	2,669,042	2,690,827
	Oil & Grease (HEM)	0	0	0	0	0
K	5-Day Biochemical Oxygen Demand.	646,527	646,527	646,527	646,527	846,484
	Total Suspended Solids	1,420,573	1,420,573	1,420,573	1,420,573	2,728,104
	Chemical Oxygen Demand	6,278,429	6,278,429	6,278,429	6,278,429	10,788,159
	Carbonaceous Biochemical Oxygen Demand.	707,270	707,270	707,270	707,270	707,270
	Ammonia as Nitrogen	469,249	469,249	469,249	469,249	664,527
	Total Nitrogen	0	3,509,950	0	3,509,950	14,427,113
	Total Phosphorus	0	0	3,830,011	3,830,011	4,363,815
	Nitrate/Nitrite ²	0	6,156,008	0	6,156,008	13,325,056
	Total Kjeldahl Nitrogen	307,004	307,004	307,004	307,004	975,539
	Oil & Grease (HEM)	320,986	320,986	320,986	320,986	346,840

¹ Incremental to baseline of current performance. Current performance based on summarized 1999 DMR data provided in response to detailed surveys. Pollutant loading for various treatment options based on sampling data, survey information, and DMR data. (See Section IV for discussion of loadings methodology).

² EPA recognizes that, in theory, total nitrogen should be less than nitrate/nitrite as nitrogen because total nitrogen is the sum of nitrate/nitrite as nitrogen and total kjeldahl nitrogen. However, the target effluent concentrations were taken from different sets of facilities (*i.e.* those that provided total nitrogen data and those that provided nitrate/nitrite as nitrogen data). EPA anticipates regulating total nitrogen, not nitrate/nitrite nitrogen for the final rule.

c. Closure Analysis

A facility (or company) forecast to have a negative net present value (NPV) of net income under at least 3 of 5 methods (described in Section VI.A) prior to regulatory costs are called “baseline closures.” In Subcategories A through D there are two baseline closures; in Subcategory K there are 10

baseline closures. The economic impact of the rule on “baseline closures” cannot be assessed using the closure model. Under the sensitivity analysis, in which a negative NPV under only 1 method is sufficient to project a closure, EPA estimates that 7 facilities are baseline closures in Subcategories A–D and 15 facilities are baseline closures in Subcategory K.

In the facility level closure analysis, no facility closures are projected under any options for Subcategories A through D under the primary analysis for the 18 out of 39 facilities analyzed and 1 facility closure is projected for all options under the sensitivity analysis. For Subcategory K, under either the primary or sensitivity analysis seven facilities from the 34 facilities out of the