SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Lime Manufacturing (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Lime Manufacturing (40 CFR part 63, subpart AAAAA**)** (Renewal)

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP), for the regulations published at regulatory citation were proposed on December 20, 2002, (67 FR 78045), and promulgated on January 5, 2004, (69 FR 393). These regulations apply to each existing and new lime manufacturing plant (LMP) that emits or has the potential to emit any single hazardous air pollutant (HAP) at a rate of 9.07 megagrams (10 tons) or more per year or any combination of HAP at a rate of 22.68 megagrams (25 tons) or more per year from all emission sources at the plant site. This subpart applies to each existing and new lime kilns and their associated coolers, and processed stone handling (PSH) operations systems located at a LMP that is a major source. A new lime kiln is a lime kiln, and its associated lime cooler for which construction or reconstruction began after December 20, 2002, and a new PSH operations system is the equipment for which construction or reconstruction began after December 20, 2002. This information is being collected to assure compliance with 40 CFR part 63, subpart AAAAA.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction (SSM) in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP. Semiannual summary reports are also required. To demonstrate continuous compliance, plants must conduct repeat performance tests every five years (sixth year after effective date).

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Based on our consultations with industry representatives, there is an average of three effected facilities at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 44 respondents per year will be subject to the standard, with one additional respondent per year becoming subject to the regulation over the next three years.

The previous ICR indicated that the "Affected Public" included "State, Local or Tribal Government." This ICR only affects "Business or other for-profit" entities and such is corrected in this ICR.

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (ICR) without any "Terms of Clearance."

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

> (A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from lime manufacturing cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart AAAAA.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and leaks are being detected and repaired and the standard is being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under (40 CFR part 63, subpart AAAAA).

3(a) Nonduplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (71 FR 35652) on June 21, 2006. No comments were received on the burden published in the Federal Register.

3(c) Consultations

Consultation with a government agency and industry representatives was conducted to determine if there is anyway for EPA to reduce the recordkeeping and reporting burden or improve the language in the standard to make it easier to comply. Our contacts were U.S. Geological Survey, M. Michael Miller, (703) 648-7716, and the National Lime Association, Mr. Eric Males, (703) 243-5463.

We also reference the most recent ICR, consulted with the preparer of the active ICR, and used other resources to obtain the most recent data available. We reviewed information

available from the United States Census Bureau, the AIRS Facility Subsystem (AFS), which is the primary source of information regarding the number of existing sources, and websites covering lime manufacturing. We also consulted with EPA's Office of Air Quality Planning and Standards, Information Transfer and Program Integration Division.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are lime manufacturing facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, which corresponds to the North American Industry Classification System (NAICS) codes, are listed below for source category descriptions.

Standard (40 CFR part 63, subpart AAAAA)	SIC Codes	NAICS Codes
Lime Manufacturing	3274	327410
Iron and Steel Mills and Ferroalloy Manufacturing		33111
Nonferrous Metal (except Aluminum) Production and Processing		3314
Non-clay Refractory Manufacturing		327125

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

In this ICR, all the data that is recorded or reported is required by NESHAP for Lime Manufacturing (40 CFR part 63, subpart AAAAA).

A source must make the following reports:

Notifications	Standard Citation by Sections
Applicability	63.9(b), 63.7130(a)
Anticipated startup	63.9(b)(4), 63.7130(a)
Commencement of construction	63.9(b)(4), 63.7130(a)
Actual startup	63.9(b)(4), 63.7130(a)
Intention to construct/reconstruct	63.9(b)(4)-(5), 63.7130(a)
Compliance dates/extension	63.9(c), 63.7130(a)
Performance test/opacity observations	63.9(e), 63.7130(a)
Compliance status	63.9(g), 63.7130(a)

Reports	
Operation, maintenance, and monitoring plan	63.7100(d)

Reports	
Startup, shutdown, and malfunction plan	63.6(e)(3), 63.7100(e)
Semiannual compliance report	63.10(d)(2), 63.7131(b)
Emergency SSM reports, including where procedures were not followed	63.6(e)(3), 63.10(d)(5), 63.7131(b)

A source must keep the following records:

Recordkeeping	
Notifications and reports	63.10(b)(2)(xiv), 63.7132(a)(1)
Startup, shutdown, and malfunction plan/events	63.6(e)(3)(iii)-(v), 63.7132(a)(2)
Performance tests and opacity observations	63.10(b)(2)(viii), 63.7132(a)(3)
Records required to demonstrate continuous compliance	63.10(b)(2)(vii), 63.7132(c)
Visual observations	63.6(h)(6), 63.7132(b)
Records are required to be retained for five years	63.10(b)(1)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents, continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.

Respondent Activities
Perform initial performance test, Reference Method 9 test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using automated monitoring equipment that provides parameter data. Although personnel at the sources still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Air Facility System (AFS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual

reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into the AFS which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Industry Burden for NESHAP for Lime Manufacturing (40 CFR part 63, subpart AAAAA).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 10,212 hours (Total Labor Hours

from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	$100.99	($48.09 + 110%)
Technical	$87.97	($41.89 + 110%)
Clerical	$43.81	($20.86 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December, 2005, Table 2.Civilian Workers, by occupational and industry group. The rates are from column 1, Total compensation. The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

Capital/Startup vs. Operation and Maintenance (O&M) Costs

(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Bag leak detector	$3,330	1	$3,330	$3,968	43	$170,624

The total capital/startup costs for this ICR are $3,330. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $170,624. This is the total of column G.

The total respondent costs in block 14 have been calculated as the addition of the capital/startup costs, and the annual operation and maintenance costs. The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be $173,954.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be $31,257.

This cost is based on the average hourly labor rate as follows:

Managerial	$57.20	(GS-13, Step 5, $35.75 x 1.6)
Technical	$42.45	(GS-12, Step 1, $26.53 x 1.6)
Clerical	$22.96	(GS-6, Step 3, $14.35 x 1.6)

These rates are from the Office of Personnel Management (OPM) 2006 General Schedule which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden – NESHAP for Lime Manufacturing (40 CFR part 63, subpart AAAAA), below.

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next three years, approximately 44 existing respondents will be subject to the standard. It is estimated that one additional respondent per year will become subject. The overall average number of respondents, as shown in the table below is 44 per year

The number of respondents is calculated using the following table that addresses the three years covered by this ICR.

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents	(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	42	0	0	43

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents	(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)
2	1	43	0	0	44
3	1	44	0	0	45
Average	1	43	0	0	44

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 44.

Total Annual Responses				
(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 applicability	1	1	0	1
Notification of construction/ reconstruction	1	1	0	1
Notification of anticipated startup	1	1	0	1
Notification of actual startup	1	1	0	1
Notification of special compliance requirements	1	1	0	1
Compliance extension request	1	1	0	1
Notification of performance tests	1	1	0	1
Notification of opacity/VE observations	1	1	0	1
Operation, maintenance, and monitoring plans	1	1	0	1
Startup, shutdown, and malfunction plans	1	1	0	1
Site-specific test plan	1	1	0	1
Notification of compliance status	1	1	0	1
Notification of compliance status	1	1	0	1
Semiannual compliance reports	44	2	0	88
Emergency startup, shutdown, or malfunction reports	2	1	0	2
			Total	103

The number of Total Annual Responses is 103.

The total annual labor costs are $866,636. Details regarding these estimates may be

found in Table 1: Annual Respondent Burden and Cost, NESHAP for Lime Manufacturing (40 CFR part 63, subpart AAAAA), below.

The total annual capital/startup and O&M costs to the regulated entities are $173,954. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The average annual Agency burden and cost over next three years is estimated to be 750 labor hours at a cost of $31,257. See Table 2: Annual Agency Burden and Cost, NESHAP for Lime Manufacturing (40 CFR part 63, subpart AAAAA), below.

6(e) Bottom Line Burden Hours Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor costs are $866,636. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Lime Manufacturing (40 CFR part 63, subpart AAAAA), below. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 99 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $173,954. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 750 labor hours at a cost of $31,257. See Table 2: Annual Agency Burden and Cost, NESHAP for Lime Manufacturing (40 CFR part 63, subpart AAAAA), below.

6(f) Reasons for Change in Burden

The increase in burden from the most recently approved ICR is due to the fact that initial compliance has been achieved, and the initial costs to comply are different from the costs to comply continuously with the standard.

There is a decrease in the capital/startup and operation and maintenance cost, which was not due to any program change. During the past three years, the respondents completed those activities required to achieve initial compliance. Such activities are more burdensome than the burden associated with the rule requirements for continuing compliance as addressed by this ICR. Hence, there is a decrease in burden.

Based on the most recent information, there was also a decrease in the number of respondents from 56 to 44 with three additional sources expected over the three-year period of this ICR renewal.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 99 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.`

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA's regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2006-0431, which is available for online viewing at www.regulations.gov, or in person viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., N.W., Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1927. An electronic version of the public docket is available online at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2006-0431 and OMB Control Number 2060-0544 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

Table 1: Annual Respondent Burden and Cost – NESHAP for Lime Manufacturing (40 CFR Part 63, Subpart AAAAA)

Burden item	(A) Person-hours per occurrence	(B) No. 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)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, installation, and utilization of technology and systems [c]	40	1	40	1	40	2	4	$3,896.02
4. Reporting Requirements								
A. Read instructions [c]	2	1	2	1	2	0.1	0.2	$194.80
B. Required activities								
Performance test for kilns [e]				5.7				$14,250.00
Performance test for material handling [f]				5.7				$21,375.00
Repeat performance tests [d]	40	1	40	5.7	228	11.4	22.8	$22,207.32
Visible emission (VE) report for material handling [g]	8	1	8	43	344	17.2	34.4	$33,505.77
Annual inspection of capture, collection, and transport system [h]	8	1	8	43	344	17.2	34.4	$33,505.77
Inspection and maintenance of affected sources, control devices, and monitoring systems according to operation, maintenance, and monitoring plan [i]	4	1	4	43	172	8.6	17.2	$16,752.88
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write reports								
Notification of applicability [c]	2	1	2	1	2	0.1	0.2	$194.80
Notification of construction/ reconstruction [c]	2	1	2	1	2	0.1	0.2	$194.80
Notification of anticipated startup [c]	2	1	2	1	2	0.1	0.2	$194.80
Notification of actual startup [c]	2	1	2	1	2	0.1	0.2	$194.80

Burden item	(A) Person-hours per occurrence	(B) No. 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)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
Notification of special compliance requirements	N/A							
Compliance extension request [c]	2	1	2	1	2	0.1	0.2	$194.80
Notification of performance tests [c]	2	1	2	1	2	0.1	0.2	$194.80
Notification of opacity/VE observations [c]	2	1	2	1	2	0.1	0.2	$194.80
Operation, maintenance, and monitoring plans [c]	40	1	40	1	40	2	4	$3,896.02
Startup, shutdown, and malfunction plan [c]	40	1	40	1	40	2	4	$3,896.02
Site-specific test plan [c]	40	1	40	1	40	2	4	$3,896.02
Notification of compliance status [c]	8	1	8	1	8	0.4	0.8	$779.21
Waiver application	N/A							
Semiannual compliance reports [j]	8	2	16	43	688	34.4	68.8	$67,011.55
Emergency startup, shutdown, or malfunction reports [k, l]	8	1	8	2	16	0.8	1.6	$1,158.41
5. Recordkeeping requirements								
A. Read instructions	See 4A							
B. Plan activities	3	1	3	1	3	0.15	0.3	$292.20
C. Implement activities [m]	12	1	12	1	12	0.6	1.2	$1,168.80
D. Develop record system	3	1	3	1	3	0.15	0.3	$292.20
E. Time to enter information								
Records of all information required by standards [n]	3	52	156	43	6,708	335.4	670.8	$653,362.56
F. Time to train personnel [o]	3	1	3	1	3	0.15	0.3	$292.20
G. Time to adjust existing ways to comply with previously applicable requirements [p]	3	1	3	1	3	0.15	0.3	$292.20
H. Time to transmit or disclose information [q]	0.25	2	4	43	172	8.6	17.2	$16,752.88

Burden item	(A) Person-hours per occurrence	(B) No. 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)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
I. Time for audits	N/A							
Subtotals Labor Burden and cost					8,880	444	888	$866,635.66
TOTAL LABOR BURDEN AND COST (rounded)					10,212			$866,636

Assumptions:

[a] We have assumed that the average number of respondent that will be subject to the rule will be forty-three existing respondents. There will be one additional new source per year that will become subject to the rule over the three-year period of this ICR.

[b] This ICR uses the following labor rates: $100.99 per hour for Executive, Administrative, and Managerial labor; $87.97 per hour for Technical labor, and $43.81 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, ATable 2. Civilian Workers, by occupational
and industry group.@ The rates are from column 1, ATotal compensation.@ The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

[c] This is a one-time only activity.

[d] To demonstrate continuous compliance, plants must conduct performance tests every 5 years. The number of respondents to repeat performance test is 5.7 test/year (43 existing respondents/5years = 8.6 performance tests per year) starting in the second year of this ICR. Therefore the average number of tests is ([8.6 / 3] X 2)= 5.7 tests/year.

[e] We have assumed that there will be a total of three new kilns in production over the three year period of the ICR, which will average out to one unit per year. The annualized cost for a performance test is $2,500 per unit.

[f] We have assumed that each plant with material handling operations would incur a one-time cost of $3,750 to perform Method 5 performance tests. This cost is based on two particulate matter (PM) tests which are calculated as follows: 1*$2,500 + 1*$1,250 = $3,750 per plant.

[g] We have assumed that each respondent will take 8 hours to complete the annual visible emission (VE) tests for material handling.

[h] We have assumed that each respondent will take 8 hours to complete the annual inspection of the capture, collection, and transport system.

[i] We have assumed that each respondent will take 4 hours to complete the inspection and maintenance of affected sources, control devices, and monitoring systems according to operation, maintenance, and monitoring plan.

[j] We have assumed that it will take 8 hours each and two times per year to complete semiannual compliance reports.

[k] We have assumed that it will take 8 hours once a year to write the emergency startup, shutdown, or malfunction reports.

[l] We have assumed that 5 percent of respondents will have to complete the emergency startup, shutdown, or malfunction reports.

[m] We have assumed that it will take 12 hours to record activities implemented.

[n] We have assumed that all respondents will take 3 hours each to enter records of all the required information 52 times a year.
[o] We have assumed that it will take 3 hours to train each personnel.
[p] We have assumed that it will take 3 hours for each respondent to adjust existing ways to comply with previously applicable requirements.
[q] We have assumed that respondents are required to transmit/disclose information twice per year..

Table 2: Average Annual EPA Burden - NESHAP for Lime Manufacturing (40 CFR Part 63, Subpart AAAAA)

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (C=AxB)	(D) Plants per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
Initial performance tests	40	1	40	1	40	2	4	$2,075.22
Retesting preparation for repeat performance test [c]	2	1	2	5.7	11.4	0.57	1.14	$548.67
Repeat performance test [c, d]	40	1	40	5.7	228	11.4	22.8	$10,854.17
Report Review								
Notification of applicability	1	1	1	1	1	0.05	0.1	$47.61
Notification of construction/reconstruction	1	1	1	1	1	0.05	0.1	$47.61
Notification of anticipated startup	1	1	1	1	1	0.05	0.1	$47.61
Notification of actual startup	1	1	1	1	1	0.05	0.1	$47.61
Notification of special compliance requirements	N/A							
Notification of initial performance tests	1	1	1	1	1	0.05	0.1	$47.61
Notification of compliance status	4	1	4	1	4	0.2	0.4	$190.42
Review of repeat performance test report [c, e]	2	1	2	5.7	11.4	0.57	1.14	$593.18
Review of semiannual compliance report	4	2	8	43	344	17.2	34.4	$16,376.46
Review of waiver application	N/A							
Review of emergency startup, shutdown, and malfunction report	4	1	4	2	8	0.4	0.8	$380.85
Subtotals Labor Burden and cost					651.8	32.59	65.18	$31,257.02
TOTAL ANNUAL BURDEN AND COST (rounded)						750		$31,257

Assumptions:

[a] We have assumed that the average number of respondents that will be subject to the rule will be forty-three existing respondents. There will be one additional

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

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of $57.20 (GS-13, Step 5, $35.75 x 1.6), Technical rate of $42.45 (GS-12, Step 1, $26.53 x 1.6), and Clerical rate of $22.96 (GS-6, Step 3, $14.35 x 1.6). These rates are from the Office of Personnel Management (OPM) A2005 General Schedule@ which excludes locality rates of pay.

[c] To demonstrate continuous compliance, plants must conduct repeat performance tests every 5 years. The number of respondents to repeat performance test is 5.7
test/ year (43 existing respondents/5years = 8.6 performance tests per year) starting in the second year of this ICR. Therefore the average number of tests is $8.6x^2/3$ = tests/year.

[d] We have assumed that it will take 40 hours for respondents to repeat performance tests.

[e] We have assumed that it will take 2 hours for respondents to review repeat performance test report.