SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NSPS for Portland Cement Plants (40 CFR part 60, subpart F) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Portland Cement Plants (40 CFR part 60, subpart F) (Renewal)

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for the regulations published at 40 CFR part 60, subpart F were proposed on August 17, 1971, promulgated on December 23, 1971, and revised on December 14, 1988. These regulations apply to the following facilities in portland cement plants: kilns, clinker coolers, raw mill systems, raw mill dryers, raw material storage, clinker storage, finished product storage, conveyor transfer points, bagging and bulk loading and unloading systems. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 60, subpart F.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction 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 sources subject to NSPS.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two 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.

Approximately 118 sources are currently subject to the regulation, and it is estimated that no new sources will become subject to the regulation in the next three years. However, we do expect that a small percentage of existing sources will undergo modifications or reconstruction such that they will have to do the initial notifications and performance testing required by the standard. We estimate that two (2) existing sources per year over the next three years will be required to resubmit notifications and retest as a result of a modification or reconstruction.

The previous ICR had the following Terms of Clearance (TOC):

"When this ICR is resubmitted for renewal, EPA should review the estimates of annual respondent burden hours and verify that they reflect actual respondent burden, particularly the burden hours associated with filing semi-annual reports."

EPA has addressed each item of concern in the TOC by reviewing the estimates of annual respondent burden hours to verify that they reflect actual respondent burden, particularly the burden hours associated with filing semi-annual reports. Based on its knowledge of the industry, EPA considers the estimates representative of the actual burden hours encountered by facilities undertaking compliance with the rule. The semiannual report is merely the reporting of information already collected under the recordkeeping requirements for the rule. Therefore, 24 hours is a reasonable estimate of the time needed to write the report. For this ICR renewal, EPA also contacted Mr. Andy O'Hare of the Portland Cement Association, trade organization for the industry, on July 12, 2007, to request voluntary assistance in providing information related to the burden associated with this ICR. However, no comments were received.

The term, "Affected Public", applies to private sector businesses or other for-profits that manufacture portland cement. The burden to the "Affected Public" may be found in Table 1: Annual Respondent Burden and Cost, NSPS for Portland Cement Plants (attached). The burden to the "Federal Government" is attributed entirely to work performed by federal employees or government contractors, and may be found in Table 2: Annual Agency Burden and Cost, NSPS for Portland Cement Plants (attached).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

> **. . .** application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(l).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

In addition, section 114(a) states that the Administrator may require any owner or 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, particulate matter emissions from portland cement plants cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart F.

2(b) Practical Utility/Users of the Data

The control of particulate matter emissions from portland cement plants requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of particulate matter from portland cement plants are the result of the operation of the affected facilities. The subject standards are achieved by the capture of particulate emissions using a baghouse or electrostatic precipitator.

The notifications required in the applicable regulations 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 regulations are being met. Performance test reports are needed, as these are the Agency's record of a source's initial capability to comply with the emission standards, and serve as a record of the operating conditions under which compliance was achieved.

The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the standard continue to operate the control equipment in compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with the applicable regulations, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 60, subpart F.

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 (72 FR 10735) on March 9, 2007. No comments were received on the burden published in the Federal Register.

3(c) Consultations

In estimating the burden associated with this standard, EPA reviewed economic information available on the Portland Cement Association website (www.pca.org). In addition, we conducted a data query of portland cement plants included in EPA's Enforcement and Compliance History Online (ECHO). Based on the information available from both PCA and ECHO, we estimate that there are 118 existing sources subject to this regulation and that no new source will be subject to this standard over the next three years. However, we do estimate that two (2) existing sources will be modified or reconstructed such that the sources will be required to resubmit initial notifications and retest. The estimated increase in the number of existing plants and the estimated decrease in the growth rate compared to the previous ICR are due to the availability of more reliable data.

For this ICR renewal, EPA also contacted Mr. Andy O'Hare of the Portland Cement Association, trade organization for the industry, on July 12, 2007, to request voluntary assistance in providing information related to the burden associated with this ICR. However, no comments were received.

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 likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

3(e) General Guidelines

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

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. (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

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are portland cement plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is 3241, which corresponds to the North American Industry Classification System (NAICS) 327310 for portland cement plants.

4(b) Information Requested

(i) Data Items

All data in this ICR that are recorded and/or reported are required by NSPS for Portland Cement Plants (40 CFR part 60, subpart F).

A source must make the following reports:

Notification Reports	
Notification of construction/reconstruction.	60.7(a)(1)
Notification of actual startup.	60.7(a)(3)
Notification of physical or operational change that may increase the emission rate.	60.7(a)(4)
Notification of demonstration of continuous monitoring system.	60.7(a)(5)
Notification of initial performance tests.	60.8(d)

Reports	
Report on initial performance test.	60.8(a)
Semiannual report on excess emissions.	60.7(c)
Semiannual malfunction report	60.65(c)

A source must keep the following records:

Recordkeeping	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative.	60.7(b)
Record daily production and kiln feed rates	60.63(a)
Records of exceedance	60.65(a) and (b)
Records are required to be retained for two (2) years.	60.7(f)

Electronic Reporting

Currently, sources are using monitoring equipment that provides automated parameter data, e.g., continuous opacity monitoring. Although personnel at the affected facility must evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronic reporting systems are still not widely used by the regulatory agencies. 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 Continuous Monitoring System (CMS) for opacity.
Perform initial performance test, Reference Methods 5 (particulate matter concentration) and Method 9 (opacity), 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.
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.
Transmit, or otherwise disclose the information.

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 might 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 or operator for two (2) years.

5(c) Small Entity Flexibility

A majority of the affected facilities are large entities (e.g., 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 requirements the minimum 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 Respondent Burden and Cost, NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F).

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 13,806 hours [Total Labor Hours from Table 1: Annual Respondent Burden and Cost, NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F), attached]. These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS 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	$95.32	($45.39 + 110%)
Technical	$64.60	($30.76 + 110%)
Clerical	$40.09	($19.09 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2003, “Table 10. Private industry, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent 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 standards 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[1]	(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)
Continuous Opacity Monitor	$18,500	2	$37,000	$4,200	118	$495,600

[1] Cost estimates were obtained from Environmental Monitor Services, Inc. (EMS), a manufacturer of NSPS compliant continuous opacity monitors (COMS). EMS estimates the cost of a COMS to be approximately $18,500 with an average operation and maintenance (O&M) cost of $4,200.

The total capital/startup costs for this ICR are $37,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $495,600. This is the total of column G.

The total respondent costs 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 are estimated to be $533,000 (Rounded). The continuous monitoring costs that are included in this section consist only of those capital/startup and O&M costs that a source incurs as a result of the standard. Some continuous monitoring costs may not be included in this section. For instance, if a particular industry typically utilizes a control device that must have a continuous monitor (e.g., temperature, pressure drop, etc.) to function properly, and the recordation of additional measurements beyond the minimum are required by the standard, then there is no capital/startup or O&M cost, but there is a labor cost to record the additional readings. Such a cost would not appear in this section, but in the industry burden Section 6(d) below.

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 $46,943.

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

Managerial	$54.66	(GS-13, Step 5, $34.16 x 1.6)
Technical	$40.56	(GS-12, Step 1, $25.35 x 1.6)
Clerical	$21.95	(GS-6, Step 3, $13.72 x 1.6)

These rates are from the Office of Personnel Management (OPM) "2004 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Annual Agency Burden and Cost, NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F).

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

Based on our research for this ICR, approximately 118 existing sources are currently subject to the standard. It is estimated that no new source will become subject to the standard over the next three years. However, we do estimate that two (2) existing sources will be modified or reconstructed such that they will be required to resubmit initial notifications and retest.

Number of respondents is calculated using the following table, which 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[1]	(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	2	118	0	2	118

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[1]	(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	2	118	0	2	118
3	2	118	0	2	118
Average	2	118	0	2	118

[1] We estimate that two (2) existing sources will undergo a modification or reconstruction such that they will be required to resubmit initial notifications and retest.

As shown above, the average Number of Respondents over the three-year period of this ICR is 118 when rounded.

The total number of annual responses per year is calculated using the following table:

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 construction/reconstruction	2	1	N/A	2
Notification of actual startup	2	1	N/A	2
Notification of physical or operational change	2	1	N/A	2
Notification of demonstration of continuous monitoring system (CMS)	2	1	N/A	2
Notification of initial performance tests	2	1	N/A	2
Report of performance test	2	1	N/A	2
Semiannual report	118	2	N/A	236
			Total	248

The number of Total Annual Responses is 248.

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 the attached Tables 1 and 2, respectively, and are summarized on the following page.

(i) Respondent Tally

The Total Hours Requested are 13,806 hours. The total annual labor costs are $880,911. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F), attached. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 56 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $533,000. 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 1,187 labor hours at a cost of $46,943. See Table 2: Annual Agency Burden and Cost, NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F), attached.

6(f) Reasons for Change in Burden

There is no change in the labor hours or cost in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden.

Since there are no changes in the regulatory requirements and there is no significant industry growth, the labor hours and cost figures in the previous ICR are used in this ICR and there is no change in burden to industry.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 56 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-2007-0032. An electronic version of the public docket is available at http://www.regulations.gov/ which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the 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 in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, 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 docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2007-0032 and OMB Control Number 2060-0025 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

NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F)

REPORTING/RECORDKEEPING REQUIREMENT			Hours/ Occurence (A)	Occurences/ Plant/Year (B)	Total Hours/Year (C)	Plants/Year (D)	Technical Hours/Yr (E)	Mgt. Hours/Yr (F) (E x .05)	Clerical Hours/Yr (G) (E x .1)	Total Hours (H)	Total Cost/ Year (I)
1.	APPLICATIONS										
2.	SURVEY AND STUDIES										
3.	REPORTING REQUIREMENTS										
a.	Read Instructions		1	1	1	2	2	0.10	0.20	2.30	$147
b.	Required Activities										
		Initial Performance Tests	24	1	24	2	48	2.40	4.80	55.20	$3,522
		Reference Method 9 Tests	4	1	4	2	8	0.40	0.80	9.20	$587
		Repeat of Performance Tests	24	0.2	4.8	2	9.6	0.48	0.96	11.04	$704
c.	Create Information										
d.	Gather Existing Information										
e.	Write Report										
		Notification of Construction/Reconstruction	2	1	2	2	4	0.20	0.40	4.60	$294
		Notification of Actual Startup	2	1	2	2	4	0.20	0.40	4.60	$294
		Notification of Physical or Operational change	2	1	2	2	4	0.20	0.40	4.60	$294
		Notification of Demonstration of CMS	2	1	2	2	4	0.20	0.40	4.60	$294
		Notification of Initial Performance Test	2	1	2	2	4	0.20	0.40	4.60	$294
		Report of Performance Test		----------Included in 3b----------							
		Report of Semiannual Reports	16	2	32	118	3776	188.80	377.60	4,342.40	$277,064
4.	RECORDKEEPING REQUIREMENTS										
a.	Read Instructions			----------Included in 3a----------							
b.	Plan Activities			----------Included in 4c----------							
c.	Implement Activities			----------Included in 3b----------							
d.	Develop Record System		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
e.	Time to Enter Information										
		Daily Production and Kiln Feed Rates	0.125	300	37.5	118	4,425	221.25	442.50	5,088.75	324,684
		Data Collection	0.1	300	30.0	118	3,540	177.00	354.00	4,071.00	259,748
		Records of Startups, Shutdowns, Malfunctions, etc.	1.5	1	1.5	118	177	8.85	17.70	203.55	12,987
f.	Train Personnel		16	2	32	0	0	0	0	0	0
g.	Audits		16	1	16	0	0	0	0	0	0
TOTAL ANNUAL BURDEN										13,806 (Rounded)	$880,911 (Rounded)

Assumptions	
Number of existing sources	118
Number of new plants	0
Number of existing plants that undergo modification or reconstruction requiring resubmittal or notifications and retesting.	2
Rate of failed performance tests	20%
Time required to performance test (hours)	24
Time require to prepare notification (hours)	2
Exceedance data collection (hours)	0.1
Time required to record startup, shutdowns, and malfunctions (hours)	1.5
Time required to record daily production and kilnfeed rates	0.125
Estimated days of operation	300
Time required to develop semiannual report (hours)	24
Technical labor rate	$64.60
Management labor rate	$95.32
Clerical labor rate	$40.09

TABLE 2 Annual Agency Burden and Cost

NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F)

REPORTING/RECORDKEEPING REQUIREMENT	EPA Hours/ Occurence (A)	Occurences/ Plant/Year (B)	Total Hours/Year (C)	Plants/Year (D)	Technical Hours/Yr (E)	Management Hours/Yr (F) (E x .05)	Clerical Hours/Yr (G) (E x .10)	Total Hours (H)	Total Cost / Year (I)
INITIAL PERFORMANCE TESTS									
New or Modified Facility	24	1	24	2	48	2.40	4.80	55.20	$2,183
REPEAT PERFORMANCE TEST									
New or Modified Facility	24	0.2	4.8	2	9.6	0.48	0.96	11.04	$437
REPORT REVIEW									
New or Modified Facility									
Notification of Construction/Reconstruction	2	1	2	2	4	0.20	0.40	4.60	$182
Notification of Actual Startup	0.5	1	0.5	2	1	0.05	0.10	1.15	$45
Notification fo Physical and Operational Change	2	1	2	2	4	0.20	0.40	4.60	$182
Notification of Demonstration of CMS	0.5	1	0.5	2	1	0.05	0.10	1.15	$45
Notification of Initial Performance Test	0.5	1.2	0.6	2	1.2	0.06	0.12	1.38	$55
Review Test Results	8	1.2	9.6	2	19.2	0.96	1.92	22.08	$873
Review of Semiannual Reports	4	2	8	118	944	47.20	94.40	######	$42,941
TOTAL ANNUAL BURDEN								1,187	$46,943
								(Rounded)	Rounded)

Assumptions	
Number of new plants	0
Number of existing plants that undergo modification or reconstruction requiring resubmittal or notifications and retesting.	2
Rate of failed performance tests	20%
Time required to participate with performance test (per plant)	24
Time require to review construction notification (hours)	2
Time required to review startup and initial test notifications (hours)	0.5
Time required to review performance test results (hours)	8
Time required to review exceedance and malfunction reports	4
Time required to review notification of demonstration of CMS (hours)	0.5
Technical labor rate	$40.56