

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Lime Manufacturing (40 CFR Part 60, Subpart HH) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NSPS for Lime Manufacturing (40 CFR part 60, subpart HH) (Renewal), EPA ICR 1167.09, OMB Control Number 2060-0063

**1(b) Short Characterization/Abstract**

The New Source Performance Standards (NSPS), for the regulations published at 40 CFR part 60, subpart HH were proposed on May 3, 1977, promulgated on April 26, 1984, and amended on October 17, 2000 (65 FR 61760). These regulations apply to each rotary lime kiln used in the manufacturing of lime, which commenced construction or modification after May 3, 1977. The standards do not apply to facilities used in the manufacture of lime at kraft pulp mills. This information is being collected to assure compliance with 40 CFR part 60, subpart HH.

In general, all NSPS 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 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 NSPS.

Any owner/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.

Based on our consultations with industry representatives, there are an average of 2.47 affected facilities at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Approximately 41 respondents are currently subject to the regulation, and it is estimated that no additional respondents per year will become subject to the regulation in the next three years.

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

The burden to the "Affected Public" may be found in Table 1: Annual Respondent Burden and Cost - NSPS for Lime Manufacturing (40 CFR Part 60, Subpart HH) (Renewal). The burden to

the “Federal Government” is attributed entirely to work performed by federal employees or government contractors; this burden may be found in Table 2: Average Annual EPA Burden - NSPS for Lime Manufacturing (40 CFR Part 60, Subpart HH) (Renewal).

## **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)(1).

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/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 rotary lime kilns 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 HH.

### **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 ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standards are 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. Non-duplication, Consultations, and Other Collection Criteria**

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

#### **3(a) Non-duplication**

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 (73 FR 31088) on May 30, 2008. No comments were received on the burden published in the Federal Register.

#### **3(c) Consultations**

For the information collection, past consultations included referencing the most recent ICR, consultation with the preparer of the active ICR, and use of other resources to obtain the most recent data available. Information from the United States Census Bureau, U.S. Department of the Interior, U.S. Geological Survey, the Air facility System (AFS), and websites covering lime manufacturing plants was reviewed; additionally, EPA's Office of Air Quality Planning and standards, Information Transfer, the Program Integration Division, and the National Lime Association were consulted.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the First Federal Register Notice. In this case, 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 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 lime manufacturing plants. The United States Standard Industrial Classification (SIC), codes for the respondent affected by the standards are SIC 3274, which corresponds to the North American Industry Classification System (NAICS) 327410 for Lime Manufacturing.

### **(b) Information Requested**

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

#### **(i) Data Items**

All data in this ICR that is recorded and/or reported is required by NSPS Lime Manufacturing (40 CFR part 60, subpart HH).

A source must make the following reports:

<b>Notifications</b>	<b>Standard Citation by Sections</b>
Notification of construction/reconstruction	60.7(a)(1)
Notification of actual startup	60.7(a)(3)
Notification of any physical or operational change	60.7(a)(4)
Notification of demonstration of continuous monitoring system (CMS)	60.7(a)(5)
Notification of the anticipated date of the performance test	60.7(a)(6)
Notification that continuous monitoring system data will be used to determine compliance	60.7(a)(7)
Initial performance test results	60.8(a)
Semiannual excess emissions report	60.7(c)

A source must make the following reports:

<b>Recordkeeping</b>	
Record of startup, shutdown, and malfunctions	60.7(b)
Records are required to be retained for two years	60.7(f)
Observe and record Method 9 opacities	60.344(b)(4) and 60.11(b)

Electronic Reporting

At the present, respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must evaluate the data, this internal automation has significantly reduced the burden associated with monitoring and recordkeeping at the 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**

<b>Respondent Activities</b>
Read instructions.

<b>Respondent Activities</b>
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for wet scrubber.
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.

## **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.

<b>Agency Activities</b>
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/operator for two 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. The number of small entities affected by this rule could not be determined, based on review of the following sources: the promulgated rule notice in the Federal Register; the *Standards Support and Environmental Impact Statement Volume I: Proposed Standards of Performance for Lime Manufacturing Plants* (1977); and a search of publicly available current data sources. The Environmental Impact Statement document concludes that the trend is toward new plants with production greater than 300 tons per day; plant size has been increasing steadily and should continue to do so.

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 Industry Burden for NSPS for Lime Manufacturing (40 CFR Part 60, Subpart HH).

## **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 3,773 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of this 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	\$97.46	(\$46.41 + 110%)
Technical	\$83.71	(\$39.86 + 110%)
Clerical	\$42.55	(\$20.26 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 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 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 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 monitor and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(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)
Continuous Opacity Monitor	\$15,000	0	\$0	\$1,500	41	\$61,500

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



The total operation and maintenance (O&M) costs for this ICR are \$61,500. 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 \$61,500.

### **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 \$15,292.

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

Managerial	\$56.02	(GS-13, Step 5, \$35.01 x 1.6)
Technical	\$41.57	(GS-12, Step 1, \$25.98 x 1.6)
Clerical	\$22.50	(GS-6, Step 3, \$14.06 x 1.6)

These rates are from the Office of Personnel Management (OPM) "2005 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: NSPS for Lime Manufacturing (40 CFR Part 60, Subpart HH) (Renewal), attached.

### **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 41 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below is 41 per year.

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

<b>Number of Respondents</b>					
	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	0	41	0	0	41
2	0	41	0	0	41
3	0	41	0	0	41
Average	0	41	0	0	41

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 41.

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

<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 actual startup	0	1	0	0
Notification of initial performance test	0	1	0	0
Notification of any physical or operational changes	0	1	0	0
Notification of demonstration of CMS	0	1	0	0
Notification that continuous monitoring system (CMS)	0	1	0	0
Semiannual excess emission report	41	2	0	82
			Total	82

The number of Total Annual Responses is 82.

### **6(e) Bottom Line 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 \$304,556. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NSPS for Lime Manufacturing (40 CFR Part 60, Subpart HH) (Renewal), attached. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 46 hours per response

The total annual capital/startup and O&M costs to the regulated entity are \$61,500. 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 377 labor hours at a cost of \$15,292. See Table 2: Annual Agency Burden and Cost, NSPS for Lime Manufacturing (40 CFR Part 60, Subpart HH) (Renewal), attached.

### **6(f) Reasons for Change in Burden**

There is no change in the labor hours or cost to the respondents 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 respondents is very low, negative, or non-existent. Therefore, the labor hours and cost figures in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR. Apparent differences of less than \$500 are attributable to rounding; in previous years, O&M costs were rounded to the nearest thousand; this ICR presents more exact figures.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 46 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, 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-2008-0363. 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) 566-1927. 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-2008-0363 and OMB Control Number 2060-0063 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 Lime Manufacturing (40 CFR Part 60, Subpart HH) (Renewal)**

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 <sup>a</sup>	(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, \$ <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read instructions	1	1	1	0	0	0	0	\$0
B. Required activities:								
Initial performance tests <sup>c</sup>	280	1	280	0	0	0	0	\$0
Reference Method 9 Test <sup>d</sup>	4	1.2	4.8	0	0	0	0	\$0
Repeat of performance test <sup>e</sup>	280	0.2	56	0	0	0	0	\$0
C. Create information	Included in 3B							
D. Gather Existing Information	Included in 3B							
E. Write report								
Notification of construction / reconstruction	2	1	2	0	0	0	0	\$0

<b>Burden item</b>	<b>(A) Person- hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>	<b>(C) Person- hours per respondent per year (C=AxB)</b>	<b>(D) Respondents per year <sup>a</sup></b>	<b>(E) Technical person- hours per year (E=CxD)</b>	<b>(F) Management person-hours per year (Ex0.05)</b>	<b>(G) Clerical person- hours per year (Ex0.1)</b>	<b>(H) Cost, \$ <sup>b</sup></b>
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Notification of any physical or operational change	2	1	2	0	0	0	0	\$0
Notification of demonstration of continuous monitoring system	2	1	2	0	0	0	0	\$0
Notification that continuous monitoring system (CMS)	2	1	2	0	0	0	0	\$0
Semiannual excess emissions <sup>f</sup> reports	8	2	16	41	656	32.8	65.6	\$60,901.73
Performance test results	Included in 3B							
SUBTOTAL Reporting						754.4		\$60,901.73
4. Recordkeeping requirements								
A. Read instructions	Included in 3A							
B. Plan activities	Included in 3B							
C. Implement activities	Included in 3B							
D. Develop record system	N/A							

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 <sup>a</sup>	(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, \$ <sup>b</sup>
E. Time to enter information								
Records of CMS operating <sup>g</sup> parameters	0.25	250	62.5	41	2,563	128.15	256.3	\$237,943.80
Records of startup, shutdown, malfunction	1.5	1	1.5	41	61.5	3.08	6.15	\$5,710.03
F. Time to train personnel	N/A							
G. Time for audits	N/A							
SUBTOTAL Recordkeeping					3,018.18			\$243,653.8
Subtotals Labor Burden and Cost					3,280.5	164.03	328.05	\$304,555.56
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>					3,773			\$304,556

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 41, and no additional new sources will become subject to the rule over the three-year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$97.46 per hour for Executive, Administrative, and Managerial labor; \$83.71 per hour for Technical labor, and \$42.55 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 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.

<sup>c</sup> We have assumed that it will take 280 hours to complete a performance test.

<sup>d</sup> It will take respondents 4 hours to conduct a reference Method 9 test.

<sup>e</sup> We have assumed that 20 percent of new respondents will have to repeat the performance test.

<sup>f</sup> We have assumed that it will take 8 hour two times per year for each respondent to complete the semiannual report of exceedances.

<sup>g</sup> We have assumed that it will take 250 days per year to record CMS operating parameters information.

<sup>h</sup> We have assumed that it will take 1.5 hours once a year to record information on startup, shutdown, malfunction.



**Table 2: Average Annual EPA Burden - NSPS for Lime Manufacturing (40 CFR Part 60, Subpart HH) (Renewal)**

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 <sup>a</sup>	(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, \$ <sup>b</sup>
Initial performance tests <sup>c</sup>	38	1	38	0	0	0	0	\$0
Repeat performance test <sup>d</sup>	38	0.2	7.6	0	0	0	0	\$0
Report Review:								
Notification of <sup>e</sup> construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of actual startup	0.5	1	0.5	0	0	0	0	\$0
Notification of physical or <sup>f</sup> operational change	0.5	1.2	0.6	0	0	0	0	\$0
Notification of demonstration of CMS	0.5	1	0.5	0	0	0	0	\$0
Notification of CMS data to determine compliance	0.5	1	0.5	0	0	0	0	\$0
Performance test results <sup>g</sup>	8	1.2	9.6	0	0	0	0	\$0
Semiannual report <sup>h</sup>	4	2	8	41	328	16.4	32.8	\$15,291.69
						377		

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 <sup>a</sup>	(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, \$ <sup>b</sup>
TOTAL ANNUAL BURDEN AND COST (rounded)								\$15,29 2

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 41 respondents currently operating in the United States which are subject to the regulation. It is estimated that no additional respondents will become subject to the regulation in the next three years based on information available on the sector. Therefore, the average number of respondents per year is estimated to be 41.

<sup>b</sup> 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 \$56.02 (GS-13, Step 5, \$35.01 x 1.6), Technical rate of \$41.57 (GS-12, Step 1, \$25.98 x 1.6), and Clerical rate of \$22.50 (GS-6, Step 3, \$14.06 x 1.6). These rates are from the Office of Personnel Management (OPM) “2005 General Schedule” which excludes locality rates of pay.

<sup>c</sup> We have assumed that it will take 38 hours to perform an initial performance test.

<sup>d</sup> We have assumed that 20 percent of new respondents will have to repeat the performance test.

<sup>e</sup> It will take 2 hours to review construction/reconstruction report.

<sup>f</sup> It will take 0.5 hours to review the physical or operational change review.

<sup>g</sup> We have that it will take 8 hours to review the performance test results report.

<sup>h</sup> We have assumed that it will take 4 hour two times per year for each respondent to review the semiannual report.