

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Refractory Products Manufacturing (40 CFR Part 63, Subpart SSSSS)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Refractory Products Manufacturing (40 CFR Part 63, Subpart SSSSS) (Renewal), EPA ICR Number 2040.04, OMB Control Number 2060-0515

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP), for Refractory Products Manufacturing were proposed on June 20, 2002 (67 FR 42107), and promulgated on April 16, 2003 (68 FR 18729). These regulations apply to each existing refractory products manufacturing which produces refractory bricks, refractory shapes, kiln furniture, crucibles, and other materials used as linings for boilers, kilns, and other processing units and equipment where extremes of temperature, corrosions, and abrasion would destroy other materials. The rule applies to facilities that manufacture refractory products and use organic hazardous air pollutant (HAP), chromium refractory, and clay refractory products. The new or reconstructed affected sources are shape dryers, curing ovens, and kilns that are used to manufacture refractory products that use organic HAP; shape preheaters, pitch working tanks, defumers, and coking ovens used to produce pitch-impregnated refractory products; kilns that are used to manufacture chromium refractory products; and kilns that are used to manufacture clay refractory products. This ICR is for Hazardous Air Pollutant (HAP) emission major sources in the refractory products manufacturing source category.

In general, all NESHAP standards require initial notifications, compliance status report, and performance tests 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.

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 one affected facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

An average of eight respondents will be subject to the regulation over the period covered by this ICR, and it is estimated that no additional respondents 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 – NESHAP for Refractory Products Manufacturing (40 CFR Part 63, Subpart SSSSS) (Renewal), attached below. 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 - NESHAP for Refractory Products Manufacturing (40 CFR Part 63, Subpart SSSSS) (Renewal), attached below.

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, particulate matter emissions from facilities in refractory products manufacturing cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for the source category at 40 CFR part 63, subpart SSSSS.

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 either the Agency or its 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, 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 63, subpart SSSSS.

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

Consultation with an industry representative (i.e., respondent) was previously 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; additionally, the most recent

ICR was referenced, the preparer of the active ICR consulted, and other references were used to obtain the most recent data available.

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 that 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.

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. Also, the retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. If records were retained for less than five years, EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of 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

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 refractory products manufacturing. 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 JJJJ)	SIC Codes	NAICS Codes
Clay refractory manufacturing	3255	327124
Nonclay refractory manufacturing	3297	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

All data in this ICR that are recorded and/or reported are required by NESHAP for Refractory Products Manufacturing (40 CFR part 63, subpart SSSSS).

A source must make the following reports:

Notifications	Standard Citation by Sections
Initial notification	63.9(b)(2) and (3), 63.5, 63.9812(b)-(c)
Notification of performance test	63.7(b)-(c), 63.9(e), and 63.9812(d)
Notification of compliance status	63.9(h), 63.10(d)(2), and 63.9812(e)
Notification of alternative fuel use	63.9812(f)
Startup, shutdown, malfunction	63.10(d)(5), 63.9814(c)(4)
No deviations/no continuous monitoring system (CMS) out of control	63.9814(c)(5)-(6)
Deviations/out of control CMS	63.9814(d)-(f)
Report of alternative fuel use	63.9841(g)

A source must make the following reports:

Recordkeeping	
Record of startup, shutdown, and malfunctions	63.6(e)(3), 63.10(b)(2), 63.9816(a)(2)

Recordkeeping	
Records of performance tests	63.10(b)(2)(viii), 63.9816(a)(3)
Initial notification or notification of compliance status	63.10(b)(2)(xiv), 63.9816(a)(1)
Record of each CMS	63.8(d)(3), 63.8(f)(6)(i), 63.8(g), 63.10(b)(2)(vi)- (xi), and 63.9816(c)
Records are required to be retained for five years	63.10(b)(1)

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

Respondent Activities
Read instructions.
Perform initial performance test, Reference Methods 25A 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 AIRS Facility Subsystem (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.

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. Both the EPA and its delegated Authorities can edit, store, retrieve and analyze this 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. 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 *Economic Impact Analysis of the Refractory Product Manufacturing NESHAP: Final Report* (2001); and a search of publicly available current data sources. The Economic Impact Analysis document states: "The Agency conducted a screening analysis to assess the impacts of the proposed rule on small businesses and to compare the impacts on small businesses with the impacts on large businesses." Of 80 total companies analyzed, 58 (72.5%) were considered small businesses.

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 NESHAP for Refractory Products Manufacturing (40 CFR part 63, subpart SSSSS) (Renewal), attached below.

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and the 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 338 (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 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	\$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 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 (O&M) 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) 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)
Continuous parameter monitoring system	\$16,820	0	\$0	\$380	8	\$3,040

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 \$3,040. 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 \$3,000 (rounded).

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 emission, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$7,273. 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: Average Annual EPA Burden, NESHAP for Refractory Products Manufacturing (40 CFR part 63, subpart SSSSS) (Renewal), attached 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 eight existing respondents will be subject to the standard. It is estimated that no additional respondent per year will become subject. The overall average number of respondents, as shown in the table below is eight per year.

The 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	(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	8	0	0	8
2	0	8	0	0	8
3	0	8	0	0	8
Average	0	8	0	0	8

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 eight.

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 applicability	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of anticipated startup	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test	0	1	0	0
Notification of compliance status	0	1	0	0
Notification of intent to use alternative fuel	3	1	0	3
Report of deviations	1	1	0	1

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 $E=(B \times C)+D$
Report of no deviations	7	2	0	14
Startup, shutdown, malfunction report	1	1	0	1
Report of alternative fuel use	3	1	0	3
			Total	22

The number of Total Annual Responses is 22.

6(e) Bottom Line Burden Hours Burden 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 \$27,304. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Refractory Products Manufacturing (40 CFR part 63, subpart SSSSS) (Renewal), attached below. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 15 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$3,040. 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 the next three years is estimated to be 179 labor hours at a cost of \$7,273. See Table 2: Annual Agency Burden and Cost, NESHAP for Refractory Products Manufacturing (40 CFR part 63, subpart SSSSS) (Renewal), attached below.

6(f) Reasons for Change in Burden

There is no change in the estimation methodology for 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.

The previous approved ICR renewal indicated 470 annual labor hours; after review of the burden tables, we have determined that the number of indicated hours was an error. A decimal was misplaced in Table 1: Subtotals Labor burden and cost ("147" in Column F should have been "14.7"). The slight decrease in burden is due to a correction in the labor hours from 470 to 338 per year.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 15 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-2008-0292. 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-2008-0292 and OMB Control Number 2060-0515 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 Refractory Products Manufacturing (40 CFR Part 63, Subpart SSSSS) (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 ^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. Reporting Requirements								
A. Read instructions	0.5	1	4	0	0	0	00	\$0
B. Required activities								
Startup, shutdown, malfunction plan	32	1	32	0	0	0	0	\$0
Operation, maintenance, monitoring plan	32	1	32	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Notification of applicability	2	1	2	0	0	0	0	\$0
Notification of construction/ reconstruction	2	1	2	0	0	0	0	\$0
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of performance test	2	1	2	0	0	0	0	\$0
Notification of compliance status	16	1	16	0	0	0	0	\$0
Notification of intent to use alternative fuel ^c	2	1	2	3	6	0.3	0.6	\$557.03
Report of deviations ^d	16	1	16	1	16	0.8	1.6	\$1,485.41
Report of no deviations ^e	8	2	16	7	112	5.6	11.2	\$10,397.86
Startup, shutdown, malfunction report ^f	8	1	8	1	8	0.4	0.8	\$742.70
Report of alternative fuel use ^g	4	1	4	3	12	0.6	1.2	\$1,114.06

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
SUBTOTAL Reporting					177.1		\$14,297	
4. Recordkeeping Requirements								
A. Read instructions ^h	4	1	4	8	32	1.6	3.2	\$2,970.82
B. Plan activities	See 4E							
C. Implement activities	See 4E							
D. Develop record system	See 4E							
E. Time to enter information								
Records of all information required by standards ⁱ	0.25	52	13	8	104	5.2	10.4	\$9,665.15
F. Time to train personnel	20	1	20	0	0	0	0	\$0
G. Time to adjust existing ways to comply with previously applicable requirements	N/A							
H. Time to transmit or disclose information ^j	0.25	2	0.5	8	4	0.2	0.4	\$371.35
I. Time for audits	N/A							
SUBTOTAL Recordkeeping					161		\$13,007.32	
Subtotals Labor Burden and cost					294	14.7	29.4	\$27,304.38
TOTAL LABOR BURDEN AND COST (rounded)					338		\$27,304	

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be eight. There will be no 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: \$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.

^c We have assumed that three respondent will use alternative fuel once per year and will have to submit notification of intent to use alternative fuel.

^d We have assumed that one respondent will report deviation once a year.

- ^e We have assumed that seven respondents will report no deviation on a semiannual basis.
- ^f It is assumed that one respondents will have a startup, shutdown, malfunction occur.
- ^g We have assumed that three respondents will report on alternative fuel usage once a year.
- ^h We have assumed that it will take 4 hours for each respondent to read instructions.
- ⁱ We have assumed that information will be recorded once per week for 52 weeks per year.
- ^j We have assumed that it will take 0.25 hours for information to be transmitted or disclosed.

Table 2: Average Annual EPA Burden - NESHAP for Refractory Products Manufacturing (40 CFR Part 63, Subpart SSSSS) (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 ^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
Attend initial performance test	40	1	40	0	0	0	0	\$0
Attend repeat performance test								
Retesting preparation	8	1	8	0	0	0	0	\$0
Retesting	40	1	40	0	0	0	0	\$0
Report Review								
Notification of applicability	2	1	2	0	0	0	0	\$0
Notification of construction/ reconstruction	2	1	2	0	0	0	0	\$0
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
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 compliance status	2	1	2	0	0	0	0	\$0
Notification of intent to use alternative fuel ^c	2	1	2	3	6	0.3	0.6	\$279.73
Repeat performance test report	40	1	40	0	0	0	0	\$0
Semiannual compliance reports								
Deviation ^d	16	1	16	1	16	0.8	1.6	\$745.94
No Deviation ^e	8	2	16	7	112	5.6	11.2	\$5,221.55
Startup, shutdown, malfunction report ^f	16	1	16	1	16	0.8	1.6	\$745.94
Notification of alternative fuel use ^g	2	1	2	3	6	0.3	0.6	\$279.73
Subtotals Labor Burden and cost					156	7.8	15.6	\$7,272.89
TOTAL ANNUAL BURDEN AND COST (rounded)						179		\$7,273

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be eight. There will be no 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 \$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.
- ^c We have assumed that three respondent will use alternative fuel once per year and will have to submit notification of intent to use alternative fuel.
- ^d We have assumed that one respondent will report deviation once a year.
- ^e We have assumed that seven respondents will report no deviation on a semiannual basis.
- ^f It is assumed that one respondents will have a startup, shutdown, malfunction occur.
- ^g We have assumed that three respondents will report on alternative fuel usage once a year.