

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Clay Ceramics Manufacturing (40 CFR Part 63, Subpart KKKKK)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Clay Ceramics Manufacturing (40 CFR Part 63, Subpart KKKKK) (Renewal),
EPA ICR Number 2023.04, OMB Control Number 2060-0513

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Clay Ceramics Manufacturing were proposed on July 22, 2002 (67 FR 47893), and promulgated on May 16, 2003 (68 FR 26738). These standards apply to owners or operators of new and existing clay ceramic manufacturing facilities. A clay ceramics facility manufactures pressed floor tile, pressed wall tile, other pressed tile, or sanitaryware (e.g., sinks and toilets). Clay ceramics facilities typically form, dry, and fire tile or sanitaryware products that are composed of clay, shale, and various additives. Glazes are applied to some tile and sanitaryware products. Consistent with the General Provision for NESHAP for source categories (40 CFR part 63, subpart A), respondents do not include the owner, or operator of any facility that is not a major source of hazardous air pollutant (HAP) emissions, or any facility that does not operate affected kilns, even if the facility is a major source. A major source of HAP is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons or more per year, or any combination of HAP at a rate of 25 tons, or more per year, and kilns are used to fire the clay ceramic products. The predominant HAP emitted from clay ceramics manufacturing facilities includes hydrogen fluoride (HF), hydrogen chloride (HCl), and metals (antimony, arsenic, beryllium, cadmium, chromium, cobalt, mercury, manganese, nickel, lead, and selenium).

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They also are 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 NESHAP. Respondents also are required to submit semiannual reports.

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 appropriate 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 each plant site has only one respondent (i.e., the owner/operator of the plant site).

Approximately nine respondents that are existing sources will be subject to the standard and one additional respondent per year will become subject to the regulation over 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 below in Table 1: Annual Respondent Burden and Cost – NESHAP for Clay Ceramics Manufacturing (40 CFR Part 63, Subpart KKKKK) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors; this burden may be found below in Table 2: Average Annual EPA Burden – NESHAP for Clay Ceramics Manufacturing (40 CFR Part 63, Subpart KKKKK) (Renewal).

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

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

In the Administrator's judgment, HAP emissions from clay ceramics manufacturing facilities cause, or contribute to air pollution that may reasonably be anticipated to endanger

public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart KKKKK.

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 also is used for targeting inspections and as evidence in legal proceedings.

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

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

3. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart KKKKK.

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

In previous renewals, consultations with industry representatives (i.e., respondents) were 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 resources 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

These reporting and recordkeeping requirements do not violate any of the regulations promulgated 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 (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

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

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are clay ceramics manufacturers. 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 KKKKK)	SIC Codes	NAICS Codes
Ceramic Wall and Floor Tile Manufacturing	3253	327122
Vitreous China Plumbing Fixtures and China and Earthenware Fittings and Bathroom Accessories	3261	327111

4(b) Information Requested

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

(i) Data Items

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

A source must make the following reports:

Notifications	Standard Citation by Sections
Notification of applicability	63.5
Initial notification (including construction/reconstruction)	63.9 (b), and 63.8630(a)-(c)
Notification of performance test	63.7(b)-c). 63.9(e), and 63.8630(d)
Notification of compliance status (including, if applicable, performance test results, operating parameter values, documentation of fuel used, capture/collection system design information, bag leak detection system documentation, operation, maintenance, and monitoring (OM&M) plan, and startup, shutdown, and malfunction plan (SSMP)	63.9(h), 63.10(d)(2), and 63.8630(e)
Notification of alternative fuel use	63.8630(g)
Request for routine control device maintenance exemption	63.8630(f)
Semiannual compliance report	63.10(e)(3), and 63.8635(b)-(f)
Startup, shutdown, and malfunction reports	63.10(d)(5) and 63.8635(c)(4)
No deviation of compliance monitoring system (CMS)	63.8635(c)(6)-(7)
Deviation of CMS	63.8635(d)-(e)
Report of alternative fuel use	63.8635(g)

A source must make the following reports:

Recordkeeping	
Record of startup, shutdown, and malfunctions	63.6(e)(3)(iii)-(iv), and 63.8640(a)(2)
Record of initial notification and compliance status	63.10(b)(2)(xiv), and 63.8640(a)(1)
Records of SSMP and OM&M plan	63.6(e)(3), and 63.8640(c)(6)
Record of performance tests	63.10(b)(2)(viii), and 63.8640(a)(3)
Records of CMS, production records, and gab leak detection system.	63.8(d)(3), 63.8(f)(6)(i), 63.8(g), 63.10(b)(2)(vi)-(xi), and 63.8640(b)-(c)
Records of fuel type used	63.8640(c)(7)
Records are required to be retained for five years	63.10(b), and 63.8645

Electronic Reporting

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

Also, regulatory agencies, in cooperation with the respondents, continue to create reporting systems to transmit data electronically. However, electronic reporting systems still are 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, 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 need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

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

5(a) Agency Activities

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

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

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority 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 Air Facility System (AFS), which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

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

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. 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 Clay Ceramics Manufacturing NESHAP: Final Rule* (2003); and a search of publicly available current data sources. The Economic Impact Analysis document states: "Generally, the small business analysis identifies the businesses that will be affected by this proposed rule and provides an analysis to assist in determining whether

this rule is likely to impose a significant impact on a substantial number of the small businesses within this industry ... Since facilities in the clay ceramics manufacturing source category face a MACT floor that requires no control of existing sources, companies owning these facilities face no compliance costs. In other words, for all of the companies that own facilities included in the clay ceramics manufacturing source category, all have compliance costs that are zero percent of their sales. This rule is therefore not expected to have a significant impact on a substantial number of 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 below in Table 1: Annual Industry Burden - NESHAP for Clay Ceramics Manufacturing (40 CFR Part 63, Subpart KKKKK) (Renewal).

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.

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 527 hours (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 types 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 incurred 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) 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 Respondent with O&M	(G) Total O&M, (E X F)
Parameter monitoring	\$2,468	1	\$2,468	\$78	9	\$702

¹ Capital cost for new respondent includes conducting performance tests, visible emissions training for two individuals, and file cabinet.

The total capital/startup costs for this ICR are \$2,468. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$702. 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 \$39,400 (rounded). This cost is based on the average hourly labor rate as follows:

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

These rates are from the Office of Personnel Management (OPM) “2006 General Schedule” which excludes locality rates of pay. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden - NESHAP for Clay Ceramics Manufacturing (40 CFR Part 63, Subpart KKKKK) (Renewal).

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

Based on our research for this ICR, approximately 10 respondents will be subject to the standard over the next three years. The rule stipulates that only new sources with one-time-only report requirements are subject to this subpart. The overall average number of respondents, as shown in the table below, is 10 sources 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	1	8	0	0	9
2	1	9	0	0	10
3	1	10	0	0	11
Average	1	9	0	0	10

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 10.

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	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 $E=(B \times C)+D$
Notification of construction/reconstruction	1	1	0	1
Notification of anticipated startup	1	1	0	1
Notification of actual startup	1	1	0	1
Request for APCD maintenance exemption	1	1	0	1
Notification of performance test	2.8	1	0	2.8
Notification of repeat of performance tests	0.3	1	0	0.3
Notification of compliance status	2.8	1	0	2.8
Notification of alternative fuel use	1	1	0	1
Report of deviation	1.4	1	0	1.4
Report of no deviation	7.7	2	0	15.4
Report of startup, shutdown, malfunction	0.9	2	0	1.8
Report of alternative fuel use	1	1	0	1
			Total	31

The number of Total Annual Responses is 31.

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 are summarized below.

(i) Respondent Tally

The total annual labor costs are \$42,532. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Clay Ceramics Manufacturing (40 CFR Part 63, Subpart KKKKK) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 17 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$3,000 (rounded). 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 951 labor hours at a cost of \$39,380. See below Table 2: Annual Agency Burden and Cost - NESHAP for Clay Ceramics Manufacturing (40 CFR Part 63, Subpart KKKKK) (Renewal).

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: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) 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.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 17 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-2008-0369. 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-2008-0369 and OMB Control Number 2060-0513 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 Clay Ceramics Manufacturing (40 CFR Part 63, Subpart KKKKK) (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	0.5	10	5	0.25	0.5	\$464.18
B. Required activities								
Startup, shutdown, malfunction plan	32	1	32	1	32	1.6	3.2	\$2,970.82
Operation, maintenance, and monitoring plan	32	1	32	1	32	1.6	3.2	\$2,970.82
C. Create information	See4B							
D. Gather existing information	See 4B							
E. Write report								
Notification of applicability ^c	2	1	2	1	2	0.1	0.2	\$185.67
Notification of construction/reconstruction ^c	2	1	2	1	2	0.1	0.2	\$185.67
Notification of anticipated startup ^c	2	1	2	1	2	0.1	0.2	\$185.67
Notification of actual startup ^c	2	1	2		2	0.1	0.2	\$185.67
Request for APCD maintenance exemption ^c	2	1	2	1				
Notification of performance test ^d	2	1	2	2.8	5.6	0.28	0.56	\$519.90
Repeat of performance test	2	1	2	0.3	0.6	0.03	0.06	\$55.70
Notification of compliance status ^d	16	1	16	2.8	44.8	2.24	4.48	\$4,159.14
Notification of alternative fuel use ^e	2	1	2	1.8	3.6	0.18	0.36	\$334.22
Semiannual compliance reports								
Deviations ^f	16	1	16	1.4	22.4	1.12	2.24	\$2,079.56

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
No deviation ^g	2	2	4	7.7	30.8	1.54	3.08	\$2,857.41
Startup, shutdown, malfunction ^h	8	2	16	0.9	14.4	0.72	1.44	\$1,336.86
Report of alternative fuel use ⁱ	8	1	8	0.9	7.2	0.36	0.72	\$668.43
SUBTOTAL Reporting					237.36			\$19,159.72
4. Recordkeeping requirements								
A. Read instructions	4	1	4	10	40	2	4	\$3,713.52
B. Plan activities	Included in 4E							
C. Implement activities	Included in 4E							
D. Develop record system	Included in 4E							
E. Time to enter information								
Records of fuel use – new kilns ^j	1.5	52	78	1	78	3.9	7.8	\$7,241.36
Records of fuel use – existing kilns ^k	1	12	12	9	108	5.4	10.8	\$10,026.50
F. Time train personnel ^l	20	1	20	1	20	1	2	\$1,856.76
G. Time to adjust existing ways to comply with previous requirements	N/A							
H. Time to transmit/disclose information	0.25	2.3	0.575	10	5.75	0.29	0.575	\$534.06
I. Time to audit	N/A							
SUBTOTAL Recordkeeping					289.52			\$23,372.20
Subtotals Labor Burden and cost					458.15	22.91	45.815	\$42,531.92
TOTAL LABOR BURDEN AND COST (rounded)					527			\$42,532

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule is 10, with one additional new source per year 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 This is a one-time only activity.

^d We have assumed that it will take 2 hours for each respondent to write compliance status report for existing facilities. Performance tests must be conducted initially and thereafter, every five years $(1 \text{ new} + (0.20 \times 9 \text{ existing})) = 2.8$. We have assumed that 10 percent of the performance tests are repeated.

^e We have assumed that 10 percent of respondents will use an alternative fuel once per year.

^f We have assumed that 15 percent of respondents will report deviation once a year.

^g We have assumed that 85 percent of respondents will report no deviation.

^h We have assumed that 10 percent of respondents will have a startup, shutdown, malfunction occur.

ⁱ We have assumed that 10 percent of respondents will report alternative fuel use.

^j We have assumed that it will take each new respondent 1.5 hours to record information on fuel use.

^k We have assumed that it will take each existing respondent 1 hour to record information on fuel use.

^l We have assumed that it will take 20 hours to train personnel.

^m We have assumed that it will take 0.25 hours for respondents to transmit/disclose information.

Table 2: Average Annual EPA Burden - NESHAP for Clay Ceramics Manufacturing (40 CFR Part 63, Subpart KKKKK) (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
1 Initial performance test	40	1	40	2.8	112	5.6	11.2	\$5,331.87
2 Repeat performance test ^c	40	1	40	0.3	12	0.6	1.2	\$571.27
3 Report review								
Notification of applicability ^d	2	1	2	8	16	0.8	1.6	\$761.70
Notification of construction/ reconstruction ^e	2	1	2	1	2	0.1	0.2	\$95.21
Notification of anticipated startup ^{e, f}	2	1	2	1	2	0.1	0.2	\$95.21
Notification of actual startup ^{e, f}	2	1	2	1	2	0.1	0.2	\$95.21
Request APCD maintenance exemption	2	1	2	1	2	0.1	0.2	\$95.21
Notification of performance tests ^e	2	1	2	2.8	5.6	0.28	0.56	\$266.60
Notification of compliance status ^g	60	1	60	2.8	168	8.4	16.8	\$7,997.81
Notification of alternative fuel use	2	1	2	10	20	1	2	\$952.12
Performance test reports ^h	40	1	40	2.8	112	5.6	11.2	\$5,331.87
Semiannual compliance reports								
Deviations ⁱ	20	1	20	1.4	28	1.4	2.8	\$1,332.97
No deviations ^j	20	2	40	7.7	308	15.4	30.8	\$14,662.65
Startup, shutdown, malfunction report ^k	20	2	40	0.9	36	1.8	3.6	\$1,713.82

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
Report of alternative fuel use ¹	2	1	2	1	2	0.1	0.2	\$95.21
Subtotals Labor Burden and cost					827.2	41.36	82.72	\$39,398.72
TOTAL ANNUAL BURDEN AND COST (rounded)					951.28			\$39,400

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule is 10, with one additional new source per year over the three-year period of this ICR.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$57.20 (GS-13, Step 5, \$35.75 x 1.6), Technical rate of \$42.45 (GS-12, Step 1, \$26.53 x 1.6), and Clerical rate of \$22.96 (GS-6, Step 3, \$14.35 x 1.6). These rates are from the Office of Personnel Management (OPM) "2006 General Schedule" which excludes locality rates of pay.

^c We have assumed that 10 percent of initial performance test will have to be repeated.

^d We have assumed that it will take 2 hours to review report of applicability.

^e We have assumed that it will take each respondent two hours to review report.

^f Performance tests must be conducted upon startup and every five years thereafter, (1 new + (0.20x9 existing)) = 2.8

^g We have assumed that it will take 60 hours for new respondent to review report on notification of compliance status.

^h We have assumed that it will take 40 hours to review the repeat performance test report.

ⁱ We have assumed that 15 percent of respondents will report deviations once a year.

^j We have assumed that 85 percent of respondents will report no deviations on a semiannual basis.

^k We have assumed that no deviation occurred from the fuel-type work practice standard for existing kilns.

^l We have assumed that 10 percent of respondents will report using alternative fuel once a year.