

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

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

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F) (Renewal), EPA ICR number 1051.11, OMB Control Number 2060-0025

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Portland Cement Plants (40 CFR part 60, subpart F) were proposed on August 17, 1971, promulgated on December 23, 1971, and revised on December 14, 1988, October 17, 2000, and September 9, 2010. These regulations apply to the following facilities in Portland cement plants: kilns, clinker coolers, raw mill systems, raw mill dryers, raw material storage, clinker storage, finished product storage, conveyor transfer points, bagging and bulk loading and unloading systems. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 60, subpart F.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NSPS. Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the EPA regional office.

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

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 118 sources are currently subject to the regulation, and it is estimated that no new sources will become subject to the regulation in the next three years. However, it is estimated that an additional seven sources over the next three years will undergo modifications or reconstruction such that they will have to do the initial notifications and performance testing required by the standard. This will equate to two Portland cement kilns per year.

This ICR is being combined with ICR number 2307.02, OMB control number 2060-0614, and the renewal ICR.

There are approximately 118 Portland cement plants in the United State which are owned and operated by the Portland cement industry. None of the 118 plants in the United States are owned by either, state, local, tribal, or the Federal government. They are all owned and operated solely by privately owned for-profit businesses. You can find the burden to the “Affected Public” listed below in Table 1: Annual Respondent Burden and Cost - NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F) (Renewal). The Federal government burden associated with the review of reports submitted by the respondent is shown below in Table 2: Average Annual EPA Burden - NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F) (Renewal).

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

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 or operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports;
(C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in

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

In the Administrator's judgment, particulate matter emissions from Portland cement plants cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS was promulgated for this source category at 40 CFR part 60, subpart F.

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. In addition, the collected information 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 tests, 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 information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continues to operate the control equipment in compliance with the regulation.

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 F.

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 their 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 (75 FR 30812) on June 2, 2010. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry is the Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based, in part, with our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we contacted the Portland Cement Association at (202) 408-9494, and the Concrete Foundation Association at (319) 895-6940.

3(d) Effects of Less Frequent Collection

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

3(e) General Guidelines

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

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/NAIC Codes

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

4(b) Information Requested

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

(i) Data Items

In this ICR, all the data recorded or reported is required by the NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F).

A source must make the following reports:

Notifications	
Notification of construction/reconstruction	60.7(a)(1)
Notification of anticipated startup	60.7(a)(2)
Notification of actual startup	60.7(a)(3)
Notification of physical or operational change which may increase the emission rate	60.7(a)(4)
Notification of demonstration of continuous monitoring system	60.7(a)(5)
Notification of initial performance tests notice	60.8(d)
Notification of initial performance test results	60.8(a)
Repeat performance test results	60.64
Semiannual malfunction report	60.7(b), 60.65(c)

Notifications	
Semiannual report on excess emissions	60.7(c), 60.65(b)
Site-specific monitoring plan for bag leak detectors	60.63(f)(2)

A source must keep the following records:

Recordkeeping	
Startup, shutdown, malfunctions, periods where the continuous monitoring system is inoperative	60.7(b), 60.65(c)
Records of ongoing monitoring	60.7(f)
Record daily production and kiln feed rates	60.63(a)
Records of exceedance	60.65(a-b)
Maintain all records for two years	60.7(f)

Electronic Reporting

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

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

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate SO ₂ and NO _x Continuous Emission Monitoring Systems (CEMS), and flow meters.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Perform initial performance test, Reference Method 20 test, and repeat performance tests if necessary.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.

Respondent Activities
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., continuous parameter monitoring system). Although personnel at the source 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, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the OTIS.

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 operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. 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 OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. EPA delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner or operator for two years.

5(c) Small Entity Flexibility

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

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost - NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F) (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. Wherever 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 17,666 (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$116.05 (\$55.26 + 110%)
Technical	\$97.21 (\$46.29 + 110%)
Clerical	\$48.87 (\$23.27 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2010, "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 standards are both labor costs, which are addressed elsewhere in this ICR, and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents ¹	(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)
CEMS	\$19,507	2	\$39,014	\$7,490	118	\$883,820
Flow Meter	\$8,090	2	\$16,180			
Total			\$55,194			\$883,820

¹ It is assumed that all new kilns will use CEMS and flow meters for compliance with the proposed new SO₂ and NO_x limits.

The total capital/startup costs for this ICR are \$55,194. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$883,820. This is the total of column G.

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 \$939,014

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA 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 \$50,446.

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

Managerial	\$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2010 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden - NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F) (Renewal).

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 118 respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject to the standard over the three-year period of this ICR. However, we do estimate that two existing sources will be modified or reconstructed as such they will be required to resubmit initial notifications and retest.

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

Number of Respondents					
Year	(A) Number of New Respondents ¹	(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	2	118	0	2	118
2	2	118	0	2	118
3	2	118	0	2	118
Average	2	118	0	2	118

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

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 118.

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 $E=(B \times C)+D$
Notification of construction/ reconstruction	2	1	N/A	2
Notification of actual startup	2	1	N/A	2
Notification of physical or operational change	2	1	N/A	2
Notification of demonstration of CEMS	2	1	N/A	2
Notification of initial performance tests	2	1	N/A	2
Report of performance test	2	1	N/A	2
Semiannual report	118	2	N/A	236
Total Number of Annual Responses				248

The number of Total Annual Responses is 248.

The total annual labor costs are \$1,827,645 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F) (Renewal).

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

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

(i) Respondent Tally

The total annual labor hours are 17,666. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 71 hours (rounded) per response.

The total annual capital/startup and Operation and Maintenance (O&M) costs to the regulated entity are \$939,014.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 1,119 labor hours at a cost of \$50,446. See below Table 2: Average Annual EPA Burden and Cost – NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F) (Renewal).

6(f) Reasons for Change in Burden

There is no increase in the number of affected facilities, or the number of responses compared to the previous ICR. There is, however, an increase in the estimated hours, and labor burden cost as currently identified in the OMB Inventory of Approved Burdens. This change in burden has occurred because this renewal ICR is being combined with EPA ICR number 2307.02, which resulted in an increase in burden hours and cost.

The combining of the previous ICR with EPA ICR number 2307.02, has resulted in an increase in capital/startup vs. O&M costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 71 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; to 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; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of information; to search data sources; to complete and review the collection of information; and to 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-2010-0358. 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 content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search" than 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 Avenue, N.W., Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2010-0358 and OMB Control Number 2060-0025 in any correspondence.

Part B of the Supporting Statement

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

Table 1(a): Annual Respondent Burden and Cost – NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F) (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) Total Cost Per year ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions ^c	1	1	1	2	2	0.1	0.2	\$215.79
B. Required activities								
Initial performance test ^d	36	1	36	2	72	3.6	7.2	\$7,768.76
Repeat performance test ^e	36	1	36	1	36	1.8	3.6	\$3,884.38
CEMS initial performance test ^f	8	1	8	2	16	0.8	1.6	\$1,726.39
CEMS monitoring	0.5	1	0.5	2	1	0.05	0.1	\$107.90
CEMS quarterly inspections ^g	2	4	8	2	16	0.8	1.6	\$1,726.39
CEMS daily calibration drift tests ^h	0.3	330	99	2	198	9.9	19.8	\$21,364.10
Daily monitoring (CEMS) ⁱ	0.5	330	165	2	330	16.5	33	\$35,606.83
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
Notification of construction/reconstruction	2	1	2	2	4	0.2	0.4	\$431.60
Notification of actual startup	2	1	2	2	4	0.2	0.4	\$431.60
Notification of physical or operational change	2	1	2	2	4	0.2	0.4	\$431.60
Notification of demonstration of CMS	2	1	2	2	4	0.2	0.4	\$431.60
Report of performance test	See 3B							
Notification of initial performance test	2	1	2	2	4	0.2	0.4	\$431.60
Report of performance test	2	1	2	2	4	0.2	0.4	\$431.60
Semiannual reports ^j	24	2	48	118	5,664	283.2	566.4	\$611,142.77
Subtotal for Reporting Requirements						7,312.85		
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3B							
C. Implement activities	See 3B							

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) Total Cost Per year ^b
D. Develop record system	N/A							
E. Time to enter information								
Daily production and kiln feed rates ^k	0.125	330	41.25	118	4,867.5	243.37	486.7	\$525,197.79
Data Collection ^l	0.1	330	33	118	3,894	194.7	389.4	\$591,130.46
Records of startup, shutdown malfunction ^m	1.5	1	1.5	118	177	8.85	17.7	\$19,098.21
F. Train personnel for CEMS maintenance ⁿ	16	2	32	2	64	3.2	6.4	\$6,905.57
G. Audits	16	1	16	0	0	0	0	\$0
Subtotal for Recordkeeping Requirements						10,352.82		
					15,361.5	768.07	1,536.1	\$1,827,644.74
TOTAL LABOR BURDEN AND COST (rounded)						17,665.67 17,666 (rounded)		\$1,827,645 (rounded)

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 118 existing sources. There will be no additional sources over the three-year period of this ICR. We assume that two existing plants will undergo modification or reconstruction which will require re-submittal or notifications and retesting.

^b This ICR uses the following labor rates: \$116.05 per hour for Executive, Administrative, and Managerial labor; \$97.21 per hour for Technical labor, and \$48.87 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March, 2010, 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.

^c We have assumed that it will take one hour for each respondent to read instructions..

^d We have assumed that each respondent will take 36 hours to perform initial performance tests.

^e We have assumed that one respondent will have to repeat initial performance tests..

^f We have assumed that it will take each respondent eight hours four times per year to perform CEMS inspections.

^g We have assumed that it will take each respondent 2 hours 4 times per year to record daily production and kiln feed rates.

^h We have assumed that it will take each respondent 0.3 hours 330 times per year to perform daily calibration drift tests.

ⁱ We have assumed that it will take each respondent 0.5 hours 330 times per year to perform daily CEMS monitoring.

^j We have assumed that it will take each respondent 24 hours two times per year to prepare semiannual reports.

^k We have assumed that it will take each respondent 0.125 hours 330 times per year to enter daily production and kiln feed rates information.

^l We have assumed that it will take each respondent 0.1 hours 330 times per year to enter data collection information.

^m We have assumed that it will take each respondent 1.5 hours once per year to record SSM.

ⁿ We have assumed that it will take each respondent 16 hours twice a year to train personnel on how to maintain the CEMS.

Table 2: Average Annual EPA Burden - NSPS for Portland Cement Plants (40 CFR Part 60, Subpart F) (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
Report review								
Notification of construction/reconstruction ^c	2	1	2	2	4	0.2	0.4	\$207.29
Notification of actual startup ^{c,d}	0.5	1	0.5	2	1	0.05	0.1	\$51.82
Notification of physical and operational change ^c	2	1	2	2	4	0.2	0.4	\$207.29
Notification of initial performance test ^{c,e}	0.5	1.2	0.6	2	1.2	0.06	0.12	\$62.19
Review test results ^{c,f}	8	1.2	9.6	2	19.2	0.96	1.92	\$995.03
Review of semiannual reports ⁱ	4	2	8	118	944	47.2	94.4	\$48,922.32
Subtotals Labor Burden and cost					973.4	48.67	97.34	\$50,445.94
TOTAL LABOR BURDEN AND COST (rounded)						1,119.41 1,119 (rounded)		\$50,446

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 118 existing sources. There will be no additional sources over the three-year period of this ICR. We assume that two existing plants will undergo modification or reconstruction which will require re-submittal or notifications, and retesting.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 Managerial rate (GS-13, Step 5, \$38.92 x 1.6), \$46.21 Technical rate (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 Clerical rate (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) "2010 General Schedule", which excludes locality rates of pay.

^c We have assumed that the number of existing plants that undergo construction or reconstruction will be two.

^d We have assumed that it will take each respondent 0.5 hours to review the actual startup report.

^e We have assumed that it will take each respondent 0.5 hours to review initial performance test report.

^f We have assumed that it will take each respondent 8 hours to review performance test results.

^g We have assumed that it will take each respondent 4 hours two times per year to review semiannual reports.