

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Calciners and Dryers in Mineral Industries (40 CFR Part 60, Subpart UUU)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Calciners and Dryers in Mineral Industries (40 CFR Part 60, Subpart UUU)
(Renewal), EPA ICR Number 0746.08, OMB Control Number 2060-0251

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Calciners and Dryers in Mineral Industries (40 CFR Part 60, Subpart UUU) were proposed on April 23, 1986 and promulgated on September 28, 1992. These standards apply to new, modified and reconstructed Calciners and Dryers at mineral processing plants that either process or produce any of the following minerals and their concentrates or any mixture of which the majority is any of the following minerals or a combination of these minerals: alumina, ball clay, bentonite, diatomite, feldspar, fire clay, fuller's earth, gypsum, industrial sand, kaolin, lightweight aggregate, magnesium compounds, perlite, roofing granules, talc, titanium dioxide, and vermiculite. Particulate matter is the pollutant regulated under this subpart. Feed and product conveyors are not considered part of the affected facility. Facilities subject to NSPS Subpart LL, Metallic Mineral Processing Plants are not subject to this standard. There are additional processes and process units at mineral processing plants listed at section 60.730(b) which are not subject to the provisions of this subpart. This information is being collected to assure compliance with 40 CFR part 60, subpart UUU.

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 affected facilities.

Any owner or operator subject to the provisions of this part will 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 that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Approximately 167 respondents are currently subject to the regulation, and it is estimated that no additional respondents will become subject to the regulation in the next three years. This information was confirmed with the rule lead addressing this source category of the Office of Air Quality Planning and Standards (OAQPS).

In the United States, there are approximately 167 calciners and dryers in mineral facilities, which are owned and operated by the calciners and dryers industry (the “Affected Public”). None of the facilities in the United States are owned by state, local, tribal, or the Federal government; all are privately owned for-profit businesses. The burden to the “Affected Public” is listed in Table 1: Annual Industry Burden and Cost – NSPS for Calciners and Dryers in Mineral Industries (40 CFR Part 60, Subpart UUU) (Renewal). The Federal government burden associated with the review of reports submitted by the respondent is shown in Table 2: Average Annual EPA Burden – NSPS for Calciners and Dryers in Mineral Industries (40 CFR Part 60, Subpart UUU) (Renewal).

In the development of the Information Collection Request (ICR), we addressed the Office of Management and Budget (OMB) “Terms of Clearance (TOC)” on the active ICR. The TOC are as follows:

This collection of information is approved for 3 years. Before resubmission of this ICR, the Agency should update wage estimates, continuing to refer most recently available date from Bureau of Labor Statistics. In addition, the agency should verify the number of respondent entities.

EPA has addressed each item of concern in the TOC. The respondent burden, universe, labor rates, and capital cost have been thoroughly checked, and all estimates updated.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

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

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.
Section 111(a)(1).

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

In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

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

In the Administrator's judgment, particulate matter emissions from calciners and dryers in mineral industries cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart UUU.

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

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

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

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

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 (76 FR 26900) on May 9, 2011. No comments were received on the burden published in the Federal Register.

3(c) Consultations

For this information collection, we referenced the most recent ICR, which had been updated based on consultation with the preparer of the active ICR and other resources to obtain the most recent data available. Information was available from the United States Census Bureau and 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 on our consultations with the Agency's internal industry experts, the EPA Office of Air Quality Planning and Standards, Refining and Chemicals Group.

Industry trade associations and other parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we reviewed information available from the United States Census Bureau, and websites covering the industry. We also consulted with the EPA Office of Air Quality Planning and Standards, Information Transfer, Program Integration Division; the National Stone, Sand & Gravel Association, (703)526-1065; the Van Horn Metz, LLC, (610) 828-4500; and Perry Videx, LLC, 609-267-1600.

After a thorough review, it is our policy to respond to comments received since the last ICR renewal, as well as to those submitted in response to the first Federal Register notice. In this case, no comments were received.

3(d) Effects of Less Frequent Collection

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

equipment and noncompliance would decrease.

3(e) General Guidelines

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

Standard (40 CFR Part 60, Subpart UUU)	SIC Codes	NAICS Codes
Industrial Sand Mining	1446	212322
Kaolin and Ball Clay Mining	1455	212324
Other Crushed and Broken Stone Mining and Quarrying	1499	212319
All Other Nonmetallic Mineral Mining	1499	212399
Inorganic dye and Pigment Manufacturing	2816	325131
Ground or Treated Mineral and Earth Manufacturing	3295	327992
Other chemical and Fertilizer Mineral Mining	3295	327992
Clay and Ceramic and Refractory Minerals Mining	3295	212325
Kaolin and Ball Clay Mining	3295	212324
All Other Nonmetallic Mineral Mining	3295	212399

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 NSPS for Calciners and Dryers in Mineral Industries (40 CFR Part 60, Subpart UUU) (Renewal).

A source must make the following reports:

Notifications	Standard Citation by Section
Notification of construction/reconstruction	60.7(a)(1)
Notification of actual startup	60.7(a)(3)
Notification of physical or operational change	60.7(a)(4)
Initial performance test results	60.8(a)
Notification of initial performance test and repeat of test	60.8(d)
Demonstration of continuous monitoring system (CMS)	60.7(a)(5)

A source must keep the following records:

Recordkeeping	
Maintain records of startup, shutdown, malfunction period where the continuous monitoring system is inoperative	60.7(b)
Record opacity using continuous opacity monitors (COM)	60.734(a)
Observe and record Method 9 opacities	60.734(b)
Install, calibrate, maintain, and operate a device that continuously measures and records the pressure loss of the gas stream through the scrubber	60.734(d)
Semiannual reports	60.7(c), 60.735(c)
Daily recording of the two-hours average of the change in the pressure of the gas stream across the scrubber and flow rates of the scrubbing liquid	60.735(b)

Electronic Reporting

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

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

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for wet scrubber.
Perform initial performance test, Reference Method 9 test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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 Online Tracking Information System (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 operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard and 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. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

The Agency's experts have been consulted, and the Agency's internal sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standards 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 on our consultations with the Agency's internal industry experts.

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

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. The number of small entities affected by this rule could not be determined, based on review of the following sources: the promulgated rule notice in the Federal Register (57 FR 44496) on Monday, September 28, 1992; the Calciners and Dryers in Mineral Industries Background Information for Proposed Standards (1985); and a search of publicly available current data sources. Based on the Background Information document, most of the mineral dryer and calciner industries do include 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 NSPS for Calciners and Dryers in Mineral Industries (CFR Part 60, Subpart UUU) (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.

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 6,434 (Total Labor Hours from Table 1). 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	\$119.36	(\$56.84 + 110%)
Technical	\$99.18	(\$47.23 + 110%)
Clerical	\$49.35	(\$23.50 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2011, "Table 2: Civilian Workers, by Occupational and Industry group." The rates are from Column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the 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	(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)
CMS	\$4,000	0	\$0	\$650	167	\$108,550

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$108,550 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 \$108,550.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$138,476.

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

Managerial	\$62.27	(GS-13, Step 5, \$38.92 x 1.6)
Technical	\$46.21	(GS-12, Step 1, \$28.88 x 1.6)
Clerical	\$25.01	(GS-6, Step 3, \$15.63 x 1.6)

These rates are from the Office of Personnel Management (OPM) "2011 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 in Table 2: Average Annual EPA Burden - NSPS for Calciners and Dryers in Mineral Industries (CFR Part 60, Subpart UUU) (Renewal), attached.

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

Based on previous research, on average over the next three years, approximately 167 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject to the standard. The overall average number of respondents, as shown in the table below is 167 per year.

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	(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	167	0	0	167
2	0	167	0	0	167
3	0	167	0	0	167
Average	0	167	0	0	167

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 167.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction or modification	0	0	0	0
Notification of actual startup	0	0	0	0
Notification of demonstration of CMS	0	0	0	0
Notification of physical or operational change	0	0	0	0

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 initial performance test	0	0	0	0
Notification of the repeat of the performance test	0	0	0	0
Repeat of performance test results	0	0	0	0
Semiannual reports	167	2	0	334
			Total	334

The number of Total Annual Responses is 334.

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 costs are \$615,860. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost, NSPS for Calciners and Dryers in Mineral Industries (CFR Part 60, Subpart UUU) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 19 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$108,550. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 3,073 labor hours at a cost of \$138,476. See Table 2: Annual Agency Burden and Cost, NSPS for Calciners and Dryers in Mineral Industries (CFR Part 60, Subpart UUU) (Renewal).

6(f) Reasons for Change in Burden

There is an adjustment decrease in the total estimated burden hours as currently identified in the OMB Inventory of Approved Burdens. The change was due to the fact that there are no new respondents. There is, however, an increase in the estimated labor cost. The increase is not

due to any program changes. The change in burden is due to the use of the most updated labor rates.

There is a change in the capital/startup costs vs. operation and maintenance (O&M) costs, which could be attributed to the fact that no capital/startup costs are incurred because there are no new sources. The only cost that is incurred is for the O&M of the monitoring equipment.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 19 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-2011-0224, which is available for online viewing at www.regulations.gov, or in person viewing at the Enforcement and Compliance Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. 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 is (202) 566-1752. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public 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 above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2011-0224 and OMB Control Number 2060-0251 in any correspondence.

Part B of the Supporting Statement

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

information.

Burden item	(A) Technical Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical Person- hours per respondent per year (C=AxB)	(D) Respondent s 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
Notification of construction/reconstruction or modification	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of demonstration of CMS	2	1	2	0	0	0	0	\$0
Notification of physical or operation change ^k	2	1	2	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Notification of repeat performance test	2	0.2	0.4	0	0	0	0	\$0
Performance test report	8	1	8	0	0	0	0	\$0
Semiannual reports ^l	16	2	32	167	5,344	267.2	534.4	\$588,283.55
Subtotal for Reporting					6,145.6			
4. Recordkeeping Requirements								
A. Read Instructions	Included in 3A							
B. Plan activities	Included in 3B							
C. Implement activities	Included in 3B							
D. Develop record system	N/A							
E. Time to enter information								
Records of startup, shutdowns, malfunctions ^m	1.5	1	1.5	167	250.50	12.53	25.05	\$27,576..39

Burden item	(A) Technical Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical Person- hours per respondent per year (C=AxB)	(D) Respondent s 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
F. Train personnel	N/A							
G. Audits	N/A							
Subtotal for Recordkeeping						288.08		\$27,576.39
Subtotal Labor Burden					5594.50	279.73	559.45	\$588,283.55
TOTAL LABOR BURDEN AND COST (rounded)						6,433.72 6,434.(rounded)		\$615,859.94 \$615,860

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule over the three-year period of this ICR will be 167. It is estimated that no additional respondents will become subject to the regulation in the next three years.

^b This ICR uses the following labor rates: \$119.36 per hour for Executive Administrative /Managerial labor; \$99.18 per hour; for Technical labor ; and \$49.35 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2011, "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 sources will read instructions as part of their reporting requirements.

^d We have assumed that it will take 330 hours to complete a performance test.

^e We have assumed that 20 percent of new respondents will have to conduct a CMS demonstration.

^f We have assumed that 20 percent of new respondents will take two hours to conduct a scrubber demonstration.

^g We have assumed that 80 percent of new respondents will conduct a reference Method 9 test.

^h It will take respondents 18 hours to conduct a reference Method 9 test.

ⁱ It will take 4 hours to re-calibrate either the COM or the scrubber.

^j We have assumed that 20 percent of new respondents will re-calibrate the scrubber.

^k We have assumed that one respondents will notify the Agency regarding a physical or operational change.

^l We have assumed that it will take 16 hours for each respondent to complete the semiannual report of exceedances.

^m It will take each respondent 1.5 hours to record SSM information.

Table 2: Average Annual EPA Burden - NSPS for Calciners and Dryers in Mineral Industries (40 CFR Part 60, Subpart UUU) (Renewal)

Burden item	(A) Technical Person Hours Per Occurrence	(B) Number of Occurrences Per Year	(C) Technical Person Hours Per Plant Per Year (C=AxB)	(D) Plants Per Year ^a	(E) Technical Hours Per Year (E=CxD)	(F) Management Hours Per Year (F=0.05xE)	(G) Clerical Hours Per Year (G=0.1xE)	(H) Total Cost, Per Year ^b
Initial performance tests								
New or modified facility	40	1	40	0	0	0	0	\$0
Repeat performance test				0	0	0	0	
New or modified facility	40	0.2	8	0	0	0	0	\$0
Report review								
New or Modified Facility								
Modification of construction/reconstruction or modification	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of demonstration of CMS	2	1	2	0	0	0	0	\$0
Notification of physical or operational change ^c	2	1	2	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Review demonstration of CMS ^d	4	1	4	0	0	0	0	\$0
Review test results ^e	8	1.2	9.6	0	0	0	0	\$0

Burden item	(A) Technical Person Hours Per Occurrence	(B) Number of Occurrences Per Year	(C) Technical Person Hours Per Plant Per Year (C=AxB)	(D) Plants Per Year ^a	(E) Technical Hours Per Year (E=CxD)	(F) Management Hours Per Year (F=0.05xE)	(G) Clerical Hours Per Year (G=0.1xE)	(H) Total Cost, Per Year ^b
Review of semiannual report of exceedances ^f	8	2	16	167	2,672	133.6	267.2	\$138,475.06
Subtotals Labor Burden and Cost					2,672	133.6	267.2	\$138,475.06
TOTAL LABOR BURDEN AND COST (rounded)						3,072.08 3,073 (rounded)		\$138,476.

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule over the three-year period of this ICR will be 167. There are 167 existing respondents with no addition facility per year over the next three years.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 for Managerial (GS-13, Step 5, \$38.92 x 1.6), \$46.21 for Technical (GS-12, Step 1, \$28.88 x 1.6) and \$25.01 Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2011 General Schedule which excludes locality rates of pay.

^c We have assumed that one respondents will submit a notification of physical or operational change.

^d We have assumed that it will take four hours to review the CMS demonstration report.

^e We have assumed that it will take eight hours to review the performance test results.

^f It will take eight hours to review semiannual report of exceedances.