

**Table 1: Annual Respondent Burden and Cost – NSPS for Portland Cement Plants (40 CFR ]**

108.28

Burden item	(A)	(B)	(C)	(D)	(E)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondent per year <sup>a</sup>	Technical person-hours per year (E=CxD)
1. Applications	N/A				
2. Surveys and studies	N/A				
3. Reporting requirements					
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	95	95
B. Required activities					
Initial performance test <sup>d</sup>	36	1	36	2	72
Repeat performance test <sup>e</sup>	36	1	36	1	36
CEMS initial performance test <sup>f</sup>	8	1	8	2	16
CEMS quarterly inspections <sup>g</sup>	2	4	8	2	16
CEMS daily calibration drift tests <sup>h</sup>	0.3	330	99	2	198
Daily monitoring (CEMS) <sup>i</sup>	0.5	330	165	2	330
C. Create information	See 3B				
D. Gather existing information	See 3E				
E. Write report					
Notification of construction/reconstruction	2	1	2	2	4
Notification of actual startup	2	1	2	2	4
Notification of physical or operational change	2	1	2	2	4
Notification of demonstration of CEMS	2	1	2	2	4
Notification of initial performance test <sup>j</sup>	2	1.5	3	2	6
Report of performance test <sup>j</sup>	2	1.5	3	2	6
Semiannual reports <sup>k</sup>	24	2	48	95	4,560
<b>Subtotal for Reporting Requirements</b>					
4. Recordkeeping requirements					
A. Familiarize with regulatory requirements	See 3A				
B. Plan activities	See 3B				
C. Implement activities	See 3B				
D. Develop record system	N/A				
E. Time to enter information					
Daily production and kiln feed rates <sup>l</sup>	0.125	330	41.25	95	3,919
Data Collection <sup>m</sup>	0.1	330	33	95	3,135
Records of startup, shutdown malfunction <sup>n</sup>	1.5	1	1.5	95	142.5
F. Train personnel for CEMS maintenance <sup>o</sup>	16	2	32	2	64
G. Audits	16	1	16	0	0
<b>Subtotal for Recordkeeping Requirements</b>					
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>p</sup></b>					
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>p</sup></b>					
<b>GRAND TOTAL (rounded) <sup>p</sup></b>					

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 95 existing plants, of
- <sup>b</sup> This ICR uses the following labor rates: \$144.33 per hour for Executive, Administrative, and Managerial labor; \$10
- <sup>c</sup> We have assumed that all new and existing respondents will take one hour to familiarize with the regulatory require
- <sup>d</sup> We have assumed that each respondent will take 36 hours to perform initial performance tests.
- <sup>e</sup> We have assumed that one respondent will have to repeat initial performance tests..
- <sup>f</sup> We have assumed that it will take each respondent eight hours to perform CEMS performance test.
- <sup>g</sup> We have assumed that it will take each respondent 2 hours 4 times per year to perform CEMS inspections.
- <sup>h</sup> We have assumed that it will take each respondent 0.3 hours 330 times per year to perform daily calibration drift test
- <sup>i</sup> We have assumed that it will take each respondent 0.5 hours 330 times per year to perform daily CEMS monitoring.
- <sup>j</sup> There will be a total of 3 performance tests per year (2 initial and 1 repeat) for two existing plants undergoing modifi
- <sup>k</sup> We have assumed that it will take each respondent 24 hours two times per year to prepare semiannual reports.
- <sup>l</sup> We have assumed that it will take each respondent 0.125 hours 330 times per year to enter daily production and kiln t
- <sup>m</sup> We have assumed that it will take each respondent 0.1 hours 330 times per year to enter data collection information.
- <sup>n</sup> We have assumed that it will take each respondent 1.5 hours once per year to record SSM.
- <sup>o</sup> We have assumed that it will take respondents 16 hours twice a year to train personnel on how to maintain the CEMS
- <sup>p</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Part 60, Subpart F) (Renewal)**

144.33 53.34

(F)	(G)	(H)
Managem nt person/ hours per year (F=Ex0.05)	Clerical person hours per year (G=Ex0.1)	Total Cost per year <sup>b</sup>
4.75	9.5	\$11,478.90
3.6	7.2	\$8,699.80
1.8	3.6	\$4,349.90
0.8	1.6	\$1,933.29
0.8	1.6	\$1,933.29
9.9	19.8	\$23,924.44
16.5	33	\$39,874.07
0.2	0.4	\$483.32
0.2	0.4	\$483.32
0.2	0.4	\$483.32
0.2	0.4	\$483.32
0.3	0.6	\$724.98
0.3	0.6	\$724.98
228	456	\$550,987.08
<b>6,154</b>		<b>\$646,564</b>
195.9375	391.875	\$473,504.52
156.75	313.5	\$378,803.62
7.125	14.25	\$17,218.35
3.2	6.4	\$7,733.15
0	0	\$0
<b>8,349</b>		<b>\$877,260</b>
<b>14,500</b>		<b>\$1,520,000</b>
		<b>\$767,000</b>
		<b>\$2,290,000</b>

responses hr/response  
204 71.07843

perating 135 kilns. There will be no additional sources over the three-year period of this ICR. However, we assume that two  
8.28 per hour for Technical labor, and \$53.34 per hour for Clerical labor. These rates are from the United States Department of  
ments each year.

s.

cation or reconstruction ( $3/2 = 1.5$  tests/plant).

feed rates information.

s.

existing plants will undergo modification or reconstruction which will require re-submittal or notifications and retesting.  
of Labor, Bureau of Labor Statistics, September 2016, 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

fit packages available to those employed by private industry.

**Table 2: Average Annual EPA Burden and Cost – NSPS for Portland Cement Plants (40 C**

48.08

Activity	(A)	(B)	(C)	(D)	(E)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>	Technical person-hours per year (E=CxD)
Report review					
Notification of construction/reconstruction <sup>c</sup>	2	1	2	2	4
Notification of actual startup <sup>c, d</sup>	0.5	1	0.5	2	1
Notification of physical and operational change <sup>c</sup>	2	1	2	2	4
Notification of demonstration of CEMS	2	1	2	2	4
Notification of initial performance test <sup>c, e</sup>	0.5	1.5	0.75	2	1.5
Review test results <sup>c, f</sup>	8	1.5	12	2	24
Review of semiannual reports <sup>g</sup>	4	2	8	95	760
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>h</sup></b>					

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 95 existing plants.
- <sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for benefits.
- <sup>c</sup> We have assumed that the number of existing plants that undergo construction or reconstruction will be two.
- <sup>d</sup> We have assumed that it will take each 0.5 hours to review each notification of actual startup.
- <sup>e</sup> We have assumed that it will take 0.5 hours to review each notification of performance test.
- <sup>f</sup> We have assumed that it will take 8 hours to review each performance test report.
- <sup>g</sup> We have assumed that it will take 4 hours two times per year to review semiannual reports.
- <sup>h</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



**IFR Part 60, Subpart F) (Renewal)**

64.8      26.02

(F)	(G)	(H)
<b>Management person-hours per year (F=Ex0.05)</b>	<b>Clerical person-hours per year (G=Ex0.1)</b>	<b>Cost, \$<sup>b</sup></b>
0.2	0.4	\$215.69
0.05	0.1	\$53.92
0.2	0.4	\$215.69
0.2	0.4	\$215.69
0.075	0.15	\$80.88
1.2	2.4	\$1,294.13
38	76	\$40,980.72
<b>918</b>		<b>\$43,100</b>

s, operating 135 kilns. There will be no additional sources over the three-year period of this ICR. However, we assume 1 or government overhead expenses: \$64.80 Managerial rate (GS-13, Step 5, \$40.50 x 1.6), \$48.08 Technical rate (GS-12,

that two existing plants will undergo modification or reconstruction which will require re-submittal or notifications and r  
Step 1, \$30.05 x 1.6), and \$26.02 Clerical rate (GS-6, Step 3, \$16.26 x 1.6). These rates are from the Office of Personne

etesting.

l Management (OPM) “2017 General Schedule”, which excludes locality rates of pay.

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

(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F)
CEMS	\$19,507	2	\$39,014	\$7,490	95	\$711,550
Flow Meter	\$8,090	2	\$16,180	\$0	0	\$0
Total			\$55,200			\$712,000