

Table 1: Annual Respondent Burden and Cost – NESHAP for Refractory Products Manufacturing

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting Requirements			
A. Familiarization with rule requirements	0.5	1	0.5
B. Required activities			
Develop a startup, shutdown, malfunction plan	32	1	32
Develop an operation, maintenance, monitoring plan	32	1	32
Initial performance tests and reports	24	1	24
Initial CEMS demonstration ^c	229	1	229
Quarterly Appendix F audits of CEMS (THC) ^c			
a) RATA audit (one per year)	4	1	4
b) RAA audit (three per year)	4	3	12
c) Daily calibration and operation	1	365	365
C. Create information	See 3B		
D. Gather existing information	See 3B		
E. Write report			
Notification of applicability	2	1	2
Notification of construction/reconstruction	2	1	2
Notification of anticipated startup	2	1	2
Notification of actual startup	2	1	2
Notification of performance test	2	1	2
Notification of compliance status	16	1	16
Notification of intent to use alternative fuel ^d	2	1	2
Report of deviations ^e	16	1	16
Report of no deviations ^f	8	2	16
Startup, shutdown, malfunction report ^g	8	1	8
Report of alternative fuel use ^h	4	1	4
Subtotal for Reporting Requirements			
4. Recordkeeping Requirements			
A. Familiarization with rule requirements	See 3A		
B. Plan activities	See 4E		
C. Implement activities	See 4E		
D. Develop record system	See 4E		
E. Time to enter information			
Records of all information required by standards ⁱ	0.25	52	13

F. Time to train personnel	20	1	20
G. Time to adjust existing ways to comply with previously applicable rec	N/A		
H. Time to transmit or disclose information ^j	0.25	2	0.5
I. Time for audits	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL ANNUAL BURDEN AND COSTS (rounded): ^k			
TOTAL CAPITAL/O&M COST (rounded): ^k			
GRAND TOTAL (rounded): ^k			

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be eight. There will be no additional respondents.
- ^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for other labor.
- ^c We have assumed that there are no existing respondents required to comply using THC CEMS.
- ^d We have assumed that three respondents will use alternative fuel once per year and will have to submit notification of intent to use alternative fuel.
- ^e We have assumed that one respondent will report a deviation once a year.
- ^f We have assumed that seven respondents will report no deviations on a semiannual basis.
- ^g It is assumed that one respondent will have a startup, shutdown, malfunction (SSM) occur and be required to submit an immediate report.
- ^h We have assumed that three respondents will report on alternative fuel usage once a year.
- ⁱ We have assumed that information will be recorded once per week for 52 weeks per year.
- ^j We have assumed that it will take 0.25 hours for information to be transmitted or disclosed.
- ^k Totals have been rounded to 3 significant values. Figures may not add exactly due to rounding.

0	0	0	0	\$0
8	4	0.2	0.4	\$523.97
	124			\$14,147
	306			\$34,800
				\$3,040
				\$37,800

14 hr/resp

ditional new source per year that will become subject to the rule over the three-year period of this ICR.

r hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are from the United States Department of Lal

: to use alternative fuel.

mediate SSM report.

are based on OSWI NSPS/EG values

or CEMS, but the assumption is that no one is using CEMS and no new sources at this time.

or CEMS, but the assumption is that no one is using CEMS, required for only a very narrow set of sources cor

led 4 hours of burden per occurrence here, and doublecounted/overestimated the burden already included i

bor, Bureau of Labor Statistics, June 2018, "Table 2: Civilian Workers, by Occupational and Industry group." The rates

complying with a non-standard CD or invoking process changes.

in 3A.

are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages a

available to those employed by private industry.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Refractory Products Manufactu

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
Attend initial performance test	40	1	40	0
Attend repeat performance test				
Retesting preparation	8	1	8	0
Retesting	40	1	40	0
Report Review				
Notification of applicability	2	1	2	0
Notification of construction/reconstruction	2	1	2	0
Notification of anticipated startup	2	1	2	0
Notification of actual startup	2	1	2	0
Notification of initial performance test	2	1	2	0
Notification of compliance status	2	1	2	0
Notification of intent to use alternative fuel ^c	2	1	2	3
Repeat performance test report	40	1	40	0
Semiannual compliance reports				
Deviation ^d	16	1	16	1
No Deviation ^e	8	2	16	7
Startup, shutdown, malfunction report ^f	16	1	16	1
Notification of alternative fuel use ^g	2	1	2	3
TOTAL ANNUAL BURDEN AND COST (rounded) ^h				

Assumptions:

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

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for gove \$48.75 (GS-12, Step 1, \$30.47 x 1.6), and Clerical rate of \$26.38 (GS-6, Step 3, \$16.49 x 1.6). These rates are from the O:

^c We have assumed that three respondents will use alternative fuel once per year and will have to submit notification of in:

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

^e We have assumed that seven respondents will report no deviation on a semiannual basis.

^f It is assumed that one respondents will have a startup, shutdown, malfunction occur.

^g We have assumed that three respondents will report on alternative fuel usage once a year.

^h Totals have been rounded to 3 significant values. Figures may not add exactly due to rounding.

ring (40 CFR Part 63, Subpart SSSSS) (Renewal)

48.75	65.71	26.38	
(E)	(F)	(G)	(H)
Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
6	0.3	0.6	\$328.04
0	0	0	\$0
16	0.8	1.6	\$874.78
112	5.6	11.2	\$6,123.43
16	0.8	1.6	\$874.78
6	0.3	0.6	\$328.04
179			\$8,530

additional new source per year that will become subject to the rule over the three-year period of this ICR.

Government overhead expenses: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 x 1.6), Technical rate of Office of Personnel Management (OPM) “2018 General Schedule” which excludes locality rates of pay.

Intend to use alternative fuel.