SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Lime Manufacturing (40 CFR Part 63, Subpart AAAAA) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Lime Manufacturing (40 CFR Part 63, Subpart AAAAA) (Renewal),
EPA ICR Number 2072.06, OMB Control Number 2060-0544.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Lime Manufacturing were proposed on December 20, 2002, promulgated on January 5, 2004, and amended on April 20, 2006. These regulations apply to existing facilities and new major source facilities that emit or have the potential to emit any single hazardous air pollutant (HAP) at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year from all emission sources at the plant site. This Subpart covers lime kilns, their associated coolers, and processed stone handling (PSH) operation systems located at a lime manufacturing plant that is a major source. 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 63, Subpart AAAAA.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They 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 subject to NESHAP. Currently, the NESHAP also requires owners/operators to maintain records of the occurrence and duration of any startup, shutdown, or malfunction (SSM) in the operation of an affected facility, or any period during which the monitoring system is inoperative. However, the EPA is proposing amendments to the rule that would eliminate the SSM exemption, remove the SSM plan and SSM recordkeeping requirements, and require electronic submittal of performance test results.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain the file for at least five years following the generation date of such 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 U.S. Environmental Protection Agency (EPA) regional office.

There are approximately 35 major source lime manufacturing facilities, which are owned and operated by the lime manufacturing industry (aka: the “Affected Public”). None of the facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they

will all respond to EPA requirements. The “burden” to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Lime Manufacturing (40 CFR Part 63, Subpart AAAAA) (Renewal). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Lime Manufacturing (40 CFR Part 63, Subpart AAAAA) (Renewal).

Over the next three years, an average of 37 existing respondents per year will be subject to these standards, and 1 additional respondent per year will become subject to these same standards.

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

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, 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 lime manufacturing either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart AAAAA.

Section 112(d)(6) of the CAA requires the EPA to review the technology-based MACT standards and revise them “as necessary (taking into account developments in practices, processes, and control technologies)” no less frequently than every 8 years. In addition, section

112(f) of the CAA requires the EPA to determine whether the MACT emission limitations provide an ample margin of safety to protect public health. For MACT standards for HAP "classified as a known, probable, or possible human carcinogen" that "do not reduce lifetime excess cancer risks to the individual most exposed to emissions from a source in the category or subcategory to less than 1-in-1 million," the EPA must promulgate residual risk standards for the source category (or subcategory) as necessary to provide an ample margin of safety to protect public health. In doing so, the EPA may adopt standards equal to existing MACT standards if the EPA determines that the existing standards are sufficiently protective. The EPA must also adopt more stringent standards, if necessary, to prevent an adverse environmental effect, but must consider cost, energy, safety, and other relevant factors in doing so.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards 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 these standards 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 these 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 check if the pollution control devices are properly installed and operated and leaks are being detected and repaired and that these 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 63, Subpart AAAAA.

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, duplication does not exist.

3(b) Public Notice Required Prior to ICR Submission to OMB

This section is not applicable because this is a rule related ICR. Nevertheless, the ICR will be available for public review during the public comment period following publication of the proposed subpart AAAAA risk and technology review (RTR) in the Federal Register.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information was a data collection survey sent to industry according to EPA's authority under Section 114 of the Clean Air Act (CAA) in January of 2017. The growth rate for the industry is based on 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 these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted the National Lime Association, at (703) 908-0772.

Further input from stakeholders and the public is expected through public comment on the proposed amendments and this associated RTR.

3(d) Effects of Less-Frequent Collection

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these 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.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a

source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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 or recordkeeping requirements in these standards 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 lime manufacturing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3274, and the corresponding North American Industry Classification System (NAICS) code is 327410 for Lime Manufacturing.

Standard (40 CFR Part 63, Subpart AAAAA)	SIC Codes	NAICS Codes
Lime Manufacturing	3274	327410

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Lime Manufacturing (40 CFR Part 63, Subpart AAAAA).

A source must make the following reports:

Notifications	
Applicability	63.9(b), 63.7130(a)

Notifications	
Anticipated startup	63.9(b)(4), 63.7130(a)
Construction/Reconstruction	63.9(b)(4), 63.7130(a)
Actual startup	63.9(b)(4), 63.7130(a)
Intention to construct/reconstruct	63.9(b)(4)-(5), 63.7130(a)
Compliance dates/extension	63.9(c), 63.7130(a)
Performance test/opacity observations	63.9(e), 63.7130(a)
Compliance status	63.9(h), 63.7130(a)

Reports	
Operation, maintenance, and monitoring plan	63.7100(d)
Semiannual compliance report	63.10(d)(2), 63.7131(b)

A source must keep the following records:

Recordkeeping	
Notifications and reports	63.10(b)(2)(xiv), 63.7132(a)(1)
Performance tests and opacity observations	63.10(b)(2)(viii), 63.7132(a)(3)
Records required to demonstrate continuous compliance	63.10(b)(2)(vii), 63.7132(c)
Visual observations	63.6(h)(6), 63.7132(b)
Records are required to be retained for five years	63.10(b)(1)

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. As part of the RTR amendments, respondents would be required to use the EPA's Electronic Reporting Tool (ERT) to submit performance test reports for test methods supported by the ERT. The ERT can be accessed via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/).

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Method 9 test, and repeat performance tests if necessary.
Follow specified work practice standards and monitoring requirements during periods of startup and shutdown.
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.

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
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 Enforcement and Compliance History Online (ECHO) and Integrated Compliance Information System (ICIS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could 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 standards. 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.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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 original development of the regulation. In the original final rulemaking notice, EPA prepared a regulatory flexibility analysis (FRFA) which examined the impact of the final rule on small entities (See 69 FR 411, January 5, 2004). At that time, EPA concluded that small businesses represented 38

percent of the affected companies. Based on the information collected through the most recent CAA Section 114 data collection effort, there are approximately 12 companies operating 35 affected facilities. Of these, three companies operating four facilities were identified as small businesses. As such, small businesses currently account for 11% (4 out of the 35) of regulated facilities.

For this 3-year ICR period, which includes calendar years 2020, 2021, and 2022, it is estimated that there will be an average of 37 lime manufacturing plants. Based on current trends within the industry, EPA does not anticipate a growth in small business owned facilities. EPA estimates that 4 facilities will continue to be owned by small businesses over the three-year ICR period.

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 – NESHAP for Lime Manufacturing (40 CFR Part 63, Subpart AAAAA) (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 neither conduct nor 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 9,690 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulations, 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	$149.35 ($71.12 + 110%)
Technical	$112.98 ($53.80 + 110%)
Clerical	$54.81 ($26.10 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, "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. Each new respondent must conduct (at a minimum) two initial Method 5 performance tests, for the new kiln and for new material handling (if vented to a stack). The annual operation and maintenance costs are the ongoing costs to hire third-party contractors to conduct repeat Method 5 testing, the annualized cost of the bag leak/PM detectors, 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)
Bag leak detector [a]	$0	1	$0	$1,424	98	$139,552
Thermocouple [b]	$0	1	$0	$712	5	$3,560
Performance Test for New Kilns [c]	$10,000	1	$10,000	$7,750	20.4	$158,100
Performance Test for New Material Handling [d]	$10,000	1	$10,000	$7,750	2.2	$17,050
Total [e]			**$20,000**			**$318,000**

[a] The cost of a bag leak detection monitor is $10,000. The bag leak detector has a life span of 10 years. The capital cost associated with the bag leak detector was annualized assuming a seven percent interest rate and 10-year life (i.e., capital recovery factor [CRF] of 0.1424). To calculate annualized costs, the CRF was multiplied by the capital cost of the detector, or $1,424 per known fabric filter or ESP (i.e., 98). We assume that the bag leak detector is replaced every 10 years and include this as an O&M

cost.

[b] The cost of a thermocouple monitoring system is estimated at $5000. The thermocouple has a life span of 10 years. The capital cost associated with the thermocouple was annualized assuming a seven percent interest rate and 10-year life (i.e., capital recovery factor [CRF] of 0.1424). To calculate annualized costs, the CRF was multiplied by the capital cost of the detector, or $712 per known ESP (i.e., 5). We assume that the thermocouple is replaced every 10 years and include this as an O&M cost.

[c] Each new respondent is assumed to conduct an initial Method 5 performance test. It is assumed that there will be a total of three new kilns in production over the three year period of the ICR, which will average out to one unit per year. The cost for an initial Method 5 test is $10,000 per new unit. It is also assumed that each existing affected unit would conduct a Method 5 performance test every 5 years. The cost of a repeat Method 5 test is approximately $7,750. We assume 20.4 respondents will need to conduct repeat performance test per year (102 affected kilns / 5 = 20.4).

[d] Each new respondent is assumed to have a material handling operation that would conduct an initial Method 5 performance test. It is assumed that there will be a total of three new kilns in production over the three-year period of the ICR, which will average out to one unit per year. The cost of the initial test is $10,000 per new unit. Most material handling is not vented through a stack, and therefore do not conduct Method 5 tests. It is assumed that 11 existing material handling operations have stacks that would conduct a Method 5 performance test every 5 years. The cost of a repeat Method 5 test is approximately $7,750. We assume 2.2 existing respondents per year will conduct repeat tests (11 affected stacks / 5 = 2.2).

[e] Totals have been rounded to three significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are $20,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $318,000. 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 $338,000. These are the recordkeeping costs.

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 $72,200.

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

Managerial	$64.80 (GS-13, Step 5, $40.50 + 60%)
Technical	$48.08 (GS-12, Step 1, $30.05 + 60%)
Clerical	$26.02 (GS-6, Step 3, $16.26 + 60%)

These rates are from the Office of Personnel Management, 2017 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is

based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Lime Manufacturing (40 CFR Part 63, Subpart AAAAA) (Amendments).

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

Based on our research for this ICR, approximately 36 existing respondents will be subject to these standards. Over the next three years, it is estimated that one additional respondent per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 37 per year.

The number of respondents is calculated using the following table that 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 [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	1	35	0	0	36
2	1	36	0	0	37
3	1	37	0	0	38
Average	1	36	0	0	37

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

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 37.

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
Notification of construction/ reconstruction	1	1	0	1
Notification of anticipated startup	1	1	0	1
Notification of actual startup	1	1	0	1
Notification of special compliance requirements	N/A	N/A	N/A	N/A
Compliance extension request	1	1	0	1
Notification of performance tests	23.6	1	0	23.6
Notification of opacity/VE observations	37	1	0	37
Operation, maintenance, and monitoring plans	1	1	0	1
Startup, shutdown, and malfunction plans	1	1	0	1
Site-specific test plan	1	1	0	1
Notification of compliance status	1	1	0	1
Waiver application	N/A	N/A	N/A	N/A
Semiannual compliance reports	37	2	0	74
			Total	143.6

The number of Total Annual Responses is 143.6.

The total annual labor costs are $1,060,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Lime Manufacturing (40 CFR Part 63, Subpart AAAAA) (Renewal).

6(e) Bottom Line 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 9,690 hours. Details regarding these estimates may be found below in Table 1. Annual Respondent Burden and Cost – NESHAP for Lime Manufacturing (40 CFR Part 63, Subpart AAAAA) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 67 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $338,000. 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 1,540 labor hours at a cost of $72,200. See below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Lime Manufacturing (40 CFR Part 63, Subpart AAAAA) (Renewal).

6(f) Reasons for Change in Burden

This ICR is prepared for amendments to the NESHAP for Lime Manufacturing Plants (40 CFR part 63, subpart AAAAA). These amendments would: (1) revise provisions in the NESHAP to remove the SSM exemption and SSM plan; and (2) require electronic submittal of performance test results.

There is an adjustment decrease in the overall respondent burden and cost due to a decrease in the estimated number of sources subject to these regulations and the proposed removal of the SSM requirements. The decrease in sources is supported by the CAA Section 114 sent to this industry in January of 2017. There is also an adjustment increase in burden and cost per respondent due to new work practice standards for periods of startup and shutdown, specifically the addition of temperature monitoring for ESPs.

Costs per labor hour were updated to reflect current labor rates based on data available from the United States Department of Labor, Bureau of Labor Statistics, survey titled "*May 2017 National Occupational Employment and Wage Estimates United States*."[1] Labor rates for Federal employees were updated to reflect the Office of Personnel Management, 2017 General Schedule.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 67 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

1 See https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/GS_h.pdf.

sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may neither conduct nor 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 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-OAR-2017-0015 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), WJC 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) 566-1744, and the telephone number for the docket center 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, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2017-0015 and OMB Control Number 2060-0544 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 Lime Manufacturing (40 CFR Part 63, Subpart AAAAA) (Renewal)

Burden Item	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year [a]	(E) Technical Hours per Year (E=C x D)[b]	(F) Management Hours per Year (F= E x 0.05)[b]	(G) Clerical Hours per Year (G= E x 0.1)[b]	Total Labor Costs per Year
1. APPLICATIONS	N/A							
2. SURVEY AND STUDIES	N/A							
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS [c]	40	1	40	1	40	2	4	$5,037.14
4. REPORTING REQUIREMENTS								
a. Familiarization with Regulatory Requirements	2	1	2	37	74	3.7	7.4	$9,318.71
b. Required Activities								
Repeat performance tests [d]	40	1	40	22.6	904	45.2	90.4	$113,839.36
Visible emission (VE) report for material handling [e]	8	1	8	37	296	14.8	29.6	$37,274.84
Annual inspection of capture, collection, and transport system [f]	8	1	8	37	296	14.8	29.6	$37,274.84
Inspection and maintenance of affected sources, control devices, and monitoring systems according to operation, maintenance, and monitoring plan [g]	4	1	4	37	148	7.4	14.8	$18,637.42
c. Create Information	See 4B							
d. Gather Existing Information	See 4B							
e. Write Report								
Notification of Applicability [c]	2	1	2	1	2	0.1	0.2	$251.86
Notification of Construction/Reconstruction [c]	2	1	2	1	2	0.1	0.2	$251.86

Notification of Anticipated Startup [c]	2	1	2	1	2	0.1	0.2	$251.86
Notification of Actual Startup [c]	2	1	2	1	2	0.1	0.2	$251.86
Notification of Special Compliance Requirements	N/A							
Compliance Extension Request [c]	2	1	2	1	2	0.1	0.2	$251.86
Notification of Performance Test	2	1	2	23.6	47.2	2.36	4.72	$5,943.83
Notification of Opacity/VE Observations	2	1	2	37	74	3.7	7.4	$9,318.71
Operation, Maintenance, and Monitoring Plan [c]	40	1	40	1	40	2	4	$5,307.14
Startup, Shutdown, and Malfunction Plan [c]	40	1	40	1	40	2	4	$5,307.14
Site-Specific Test Plan [c]	40	1	40	1	40	2	4	$5,307.14
Notification of Compliance Status [c]	8	1	8	1	8	0.4	0.8	$1,007.43
Waiver Application								
Semiannual Compliance Reports [h]	8	2	16	37	592	29.6	59.2	$74,549.67
Subtotal for Reporting Requirements						**3,001**		**$328,573**
5. RECORDKEEPING REQUIREMENTS								
a. Familiarization with Regulatory Requirements	See 4A							
b. Plan Activities	3	1	3	1	3	0.15	0.3	$377.79
c. Implement Activities [i]	12	1	12	1	12	0.6	1.2	$1,511.14
d. Develop Record System	3	1	3	1	3	0.15	0.3	$377.79
e. Time to Enter Information								
Record of All Information Required by Standards [j]	3	52	156	37	5,772	288.6	577.2	$726,859.30
f. Train Personnel [k]	3	1	3	1	3	0.15	0.3	$377.79
g. Time to Adjust Existing Waste to Comply with Previously Applicable Requirements [l]	3	1	3	1	3	0.15	0.3	$377.79
h. Time to Transmit or Disclose Information [m]	0.25	2	0.50	37	18.5	0.93	1.85	$2,329.68
g. Time for Audits	N/A							
Subtotal for Recordkeeping Requirements						**6,687**		**$732,211**

TOTAL ANNUAL LABOR BURDEN AND COST(ROUNDED) [n]					**9,690**	**$1,060,000**
CAPITAL AND O&M COSTS (ROUNDED) [n]						**$338,000**
GRAND TOTAL (ROUNDED) [n]						**$1,400,000**

Assumptions

a. Assumed that the average number of respondents that will be subject to the rule will be 36 existing respondents. There will be one additional new source per year that will become subject to the rule over the three-year period of this ICR for a total of 37.

b. This ICR uses the following labor rates: $149.35 per hour for Executive, Administrative, and Managerial labor; $112.98 per hour for Technical labor, and $54.81 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, "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. This is a one-time only activity.

d. To demonstrate continuous compliance, plants must conduct performance tests every 5 years. The number of respondents to repeat performance test is 22.6 performance tests per year (102 kiln stacks / 5 years (20.4) + 11 material handling stacks / 5 years (2.2) = 22.6).

e. Assumed that each respondent will take 8 hours to complete the annual visible emission (VE) tests for material handling.

f. Assumed that each respondent will take 8 hours to complete the annual inspection of the capture, collection, and transport system.

g. Assumed that each respondent will take 4 hours to complete the inspection and maintenance of affected sources, control devices, and monitoring systems according to operation, maintenance, and monitoring plan.

h. Assumed that it will take 8 hours each and two times per year to complete semiannual compliance reports.

i. Assumed that it will take 12 hours to record activities implemented.

j. Assumed that all respondents will take 3 hours each to enter records of all the required information 52 times a year.

k. Assumed that it will take 3 hours to train each personnel.

l. Assumed that it will take 3 hours for each respondent to adjust existing ways to comply with previously applicable requirements.

m. Assumed that respondents are required to transmit/disclose information twice per year.

n. Totals are rounded to three significant figures. Figures may not add up exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Lime Manufacturing (40 CFR Part 63, Subpart AAAAA) (Renewal)

Burden Item	(A) EPA Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year [a]	(E) Technical Hours per Year (E=C x D) [b]	(F) Management Hours per Year (F= E x 0.05) [b]	(G) Clerical Hours per Year (G= E x 0.1) [b]	Costs per Year
INITIAL PERFORMANCE TESTS	40	1	40	1	40	2	4	$2,156.88
RETESTING PREPARATION FOR REPEAT PERFORMANCE TESTS [c]	2	1	2	22.6	45.2	2.26	4.52	$2,437.27
REPEAT PERFORMANCE TEST [c,d]	40	1	40	22.6	904	45.2	90.4	$48,745.49
REPORT REVIEW								
Notification of Applicability	1	1	1	1	1	0.05	0.1	$53.92
Notification of Construction/Reconstruction	1	1	1	1	1	0.05	0.1	$53.92
Notification of Anticipated Startup	1	1	1	1	1	0.05	0.1	$53.92
Notification of Actual Startup	1	1	1	1	1	0.05	0.1	$53.92
Notification of Special Compliance Requirements	N/A							
Notification of Initial Performance Tests	1	1	1	1	1	0.05	0.1	$53.92
Notification of Compliance Status	4	1	4	1	4	0.2	0.4	$215.69
Review of Repeat Performance Test Report [e]	2	1	2	22.6	45.2	2.26	4.52	$2,437.27
Review of Semiannual Compliance Report	4	2	8	37	296	14.8	29.6	$15,960.91
Review of Waiver Application	N/A							
TOTAL ANNUAL BURDEN [f]					**1,540**			**$72,200**

Assumptions

a. Assumed that the average number of respondents that will be subject to the rule will be 36 existing respondents. There will be one additional new source per year that will become subject to the rule over the three-year period of this ICR for an average of 37 existing and new respondents per year.

b. This ICR uses the following labor rates: $64.80 per hour for Executive, Administrative, and Managerial labor; $48.08 per hour for Technical labor, and $26.02 per hour for Clerical labor. These rates are from the Office of Personnel Management, 2017 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees.

c. To demonstrate continuous compliance, plants must conduct repeat performance tests every 5 years. The number of respondents to repeat performance test is 22.6 performance tests per year (102 kiln stacks / 5 years (20.4) + 11 material handling stacks / 5 years (2.2) = 22.6).

d. Assumed that it will take 40 hours for respondents to repeat performance tests.

e. Assumed that it will take 2 hours for respondents to review repeat performance test report.

f. Totals have been rounded to three significant figures. Figures may not add together exactly due to rounding.