SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing
(40 CFR Part 63, Subpart JJJJJ)
September 2015

Part A of the Supporting Statement

1.0 Identification of the Information Collection

1(a) Title and Number of the Information Collection

"National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing (40 CFR Part 63, Subpart JJJJJ)." This is a new information collection request (ICR). The EPA ICR tracking number is 2509.01.

1(b) Short Characterization

Potential respondents are owners or operators of new and existing sources at brick and/or structural clay products (BSCP) manufacturing facilities. A BSCP facility manufactures brick, including face brick, structural brick, brick pavers, or other brick and/or structural clay products including clay pipe; roof tile; extruded floor and wall tile; or other extruded, dimensional clay products. The BSCP facilities typically form, dry and fire bricks and shapes that are composed primarily of clay and shale. Kilns are used to fire BSCP. The rule applies to all new and existing tunnel and periodic kilns at BSCP facilities.

Consistent with the General Provisions for NESHAP for Source Categories (40 CFR part 63, subpart A), respondents do not include the owner or operator of any facility that is not a major source of hazardous air pollutant (HAP) emissions (i.e., an area source). A major source of HAP is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year. There are 90 existing BSCP facilities that are currently major sources of HAP. An estimated 21 of these facilities are projected to become synthetic area sources (i.e., obtain a federally enforceable limit reducing emissions below major source thresholds) by the effective date of the rule rather than comply with subpart JJJJJ. The remaining 69 existing BSCP facilities are expected to be subject to the rule, of which 63 are equipped with tunnel kilns, 15 with periodic kilns, and 24 with air pollution control devices (APCDs). Based on the latest BSCP industry profile, no new BSCP facilities or kilns are expected to be constructed in the near future, and existing capacity is assumed to be sufficient to cover any short-term increases in production.

Respondents must submit one-time notifications of applicability and reports on initial performance test results. Respondents must also develop and implement an operation, maintenance and monitoring (OM&M) plan covering each affected source and each emission control device used for compliance with the rule. Semiannual reports for periods of emission limitation deviations (or reports certifying that no deviations have occurred) also are required.

General requirements applicable to all NESHAP include records of applicability determinations, performance test results, deviations, monitoring records and all other information needed to determine compliance with the applicable standard. Records and reports must be retained for a minimum of 5 years. The most recent 2 years of data must be retained onsite. The remaining 3 years of data may be retained offsite.

Subpart JJJJJ requires respondents to monitor control device operating parameters to assure continuous compliance with the rule. Parameter monitoring requirements for dry injection fabric filter (DIFF) or dry lime scrubber/fabric filter (DLS) include lime injection rate monitoring and either periodic visible emissions (VE) determinations or bag leak detectors. Parameter monitoring requirements for dry limestone adsorbers (DLA) include limestone feed rate monitoring, periodic VE determinations and either pressure drop monitoring or bypass stack damper position monitoring. Facilities using a DLA must also record the source of limestone used in the DLA. The rule also includes monitoring requirements for wet scrubbers, including monitoring of pressure drop, scrubber liquid pH, scrubber liquid flow rate and chemical addition rate (if applicable), as well as monitoring of carbon flow rate for activated carbon injection. Respondents with no control device must conduct periodic VE determinations and monitor the process rate of the kiln (if their last calculated total facility maximum potential hydrogen chloride-equivalent was above the proposed acid gas emission limitation). Respondents also must maintain records of specific information needed to determine that the standards are being achieved and maintained.

2. Need For and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is required under section 112(d) of the Clean Air Act (CAA), as amended, to establish emission standards for each category or subcategory of major and area sources of HAP listed for regulation in section 112(b). These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. In addition, section 114 of the CAA allows the Administrator to require inspections, monitoring and entry into facilities to ensure compliance with a section 112 emission standard. Section 114(a)(1) specifically states that the Administrator may require any owner or operator subject to any requirement of the CAA 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; (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.

The predominant HAP emitted from BSCP manufacturing facilities include hydrogen fluoride (HF), hydrogen chloride (HCl), chlorine (Cl_2) and metals (antimony, arsenic, beryllium, cadmium, chromium, cobalt, mercury, manganese, nickel, lead and selenium). In the Administrator's judgment, the pollutants emitted from BSCP manufacturing facilities cause or

contribute significantly to air pollution that may reasonably be anticipated to endanger public health. Consequently, NESHAP for this source category were promulgated at 40 CFR part 63, subpart JJJJJ on May 16, 2003. (Note: The BSCP manufacturing source category was originally included in the clay products manufacturing industry source category in the initial list of source categories published on July 16, 1992 (57 FR 31576). The BSCP manufacturing source category was subsequently identified as a separate and distinct source category and was added to the list of source categories on July 22, 2002 (67 FR 47894).)

The BSCP standards were challenged by the Sierra Club and subsequently vacated by the United States Circuit Court for the District of Columbia on March 13, 2007, due to issues associated with the methodology used to determine the minimum regulatory "floors" for new and existing units. The EPA and Sierra Club later negotiated a consent decree to settle the litigation and set forth proposal and promulgation deadlines for reestablishing standards for this source category. Consequently, new NESHAP for this source category are being proposed.

2(b) Practical Utility/Users of the Data

The information collected from respondents will be used by EPA enforcement personnel to: (1) identify new, modified, reconstructed and existing sources subject to the standards; (2) ensure that maximum achievable control technology (MACT) is being properly applied; and (3) ensure that the emission control devices are being properly operated and maintained on a continuous basis. In addition, records and reports are necessary to enable the EPA to identify facilities that may not be in compliance with the standards. Based on the reported information, the EPA can decide which facilities should be inspected and what records or processes should be inspected at these facilities. The records that facilities maintain will indicate to the EPA whether the owners or operators are in compliance with the emission limitations (including emission limits, operating limits) and work practice standards. Much of the information the EPA would need to determine compliance would be recorded and retained onsite at the facility. Such information would be reviewed by enforcement personnel during an inspection and would not need to be routinely reported to the EPA.

3. Nonduplication, Consultations and Other Collection Criteria

3(a) Nonduplication

The information required by the BSCP manufacturing NESHAP is not duplicated by existing EPA regulations and is not expected to be required by any other EPA rulemaking currently in progress. However, certain reports required by state or local agencies may duplicate information required by the standards. In such cases, a copy of the report submitted to the state or local agency may be provided to the Administrator in lieu of the report required by the standards.

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 rule in the Federal Register.

3(c) Consultations

Specific comments on the burden associated with the information collection requirements were received from the Brick Industry Association (BIA) and companies in the BSCP industry for the 2003 rulemaking and have been incorporated in the burden estimates for this rule. Representatives of BIA and its member companies have also been consulted during development of this rule, and several meetings and teleconferences have been held with them during this time. During these meetings, the representatives were given the opportunity to comment on the regulatory approach. The major topics of these discussions included rule applicability, subcategories, emissions data, MACT floor approach and alternative standards. No specific information was provided to the representatives with respect to burden estimates prior to proposal of the rule. Others consulted for information during the development process for the proposed standards included air pollution control device vendors (Encertec, McGill AirClean, Solios Environment, W.L. Gore and Associates and Cabot Norit Activated Carbon) and small business owners in the BSCP industry.

The EPA provided a 90-day public comment period following proposal of the BSCP manufacturing NESHAP, during which all affected parties were given the opportunity to comment on the proposed rule. The EPA has considered the comments received and, as appropriate, incorporated them into the final rule. This ICR was also revised to incorporate the comments received.

3(d) Effects of Less Frequent Collection

If the relevant information was collected less frequently, the EPA would not be reasonably assured that the facilities are applying good operation and maintenance practices and meeting the emission limitations and work practice standards in the rule. In addition, our authority to take administrative action would be significantly reduced. Section 113(d) of the CAA limits the assessment of administrative penalties to violations which occur no more than 12 months before initiation of the administrative proceeding. Since administrative proceedings are less costly and require use of fewer resources than judicial proceedings, both we and the regulated community benefit from preservation of our administrative powers. Also, the reporting frequency in the rule is consistent with the requirements of title V permit programs. Consequently, less frequent reports would not result in a reduced burden.

3(e) General Guidelines

The BSCP manufacturing NESHAP requires that facilities retain records for a period of 5 years, which exceeds the 3-year retention period specified in the general information collection guidelines in 5 CFR 1320.6(f) of OMB regulations implementing the Paperwork Reduction Act. However, the 5-year retention period is consistent with the retention requirement in the General Provisions in subpart A of 40 CFR part 63 and the retention requirement in the operating permit program under 40 CFR part 70. All facilities subject to this rule will be required to obtain operating permits either through the state-approved permitting program or, if one does not exist, in accordance with the provisions of 40 CFR part 71. Thus, the 5-year record retention requirement of the rule adds no additional burden. At a minimum, respondents will be required to retain onsite the most recent 2 years of data. The remaining 3 years of data could be retained at

a readily accessible onsite or offsite storage facility. None of the other guidelines in 5 CFR 1320.6 are being exceeded.

3(f) Confidentiality

All information submitted to the EPA for which a claim of confidentiality is made will be safeguarded according to EPA policies set forth in Title 40, Chapter 1, Part 2, Subpart B -- Confidentiality of Business Information. (See 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; and 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/NAICS Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of BSCP manufacturing facilities that are major sources of HAP emissions. The North American Industry Classification System (NAICS) code for respondents affected by the standards is 327120—Clay Building Material and Refractories Manufacturing. Not all processes classified in this NAICS code are regulated by the standards.

4(b) Information Requested

(i) Data Items, Including Recordkeeping Requirements

All data in this ICR that are recorded and/or reported are required by the NESHAP for Brick and Structural Clay Products Manufacturing (40 CFR part 63, subpart JJJJJ). The following table summarizes the recordkeeping and reporting requirements under the rule.

Requirements	Rule Citation by Section
Notifications	
Initial notifications (including construction/reconstruction)	63.5, 63.9(b) and 63.8480(a)-(b)
Notification of performance test	63.7(b)-(c), 63.9(e) and 63.8480(a)-(b)
Notification of compliance status (including performance test results, operating parameter values, bag leak detection system documentation and OM&M plan)	63.9(h), 63.10(d)(2) and 63.8480(a)-(c)
Request to use routine control device maintenance alternative standard	63.8480(b)

Requirements	Rule Citation by Section
Records	
Record retention	63.10(b)(1) and 63.8495
Documentation supporting initial notifications and notifications of compliance status	63.10(b)(2)(xiv) and 63.8490(a)(1)
Records of performance tests	63.10(b)(2)(viii) and 63.8490(a)(2)
Records of control device maintenance and documentation of approved routine control device maintenance request	63.8490(a)(3)
Records for each continuous monitoring system (CMS), production records, bag leak detection system records, records of operating limit deviations and corrective actions, maintenance and inspection records, records used to demonstrate compliance with work practice standards and malfunction records	63.8(d)(3), 63.8(g), 63.10(b)(2)(iii),(vi)-(xi) and 63.8490(b)-(c)
OM&M plan	63.8490(c)(6)
Reports	
First compliance report Semi-annual compliance report: -No deviations/no out-of-control CMS -Deviations/out-of-control CMS	63.8485(a)-(e) 63.8485(a)-(e) 63.8485(c)(6)-(7) 63.8485(c)(9), (d)-(e)
Electronic submittal of performance test results (using ERT)	63.8485(f)

(ii) Respondent Activities

The respondent activities required by the standards in the first 3 years following the effective date are identified in Tables 1 through 3 and are introduced in Section 6(a).

5. The Information Collected--Agency Activities, Collection Methodology and Information Management

5(a) Agency Activities

The Agency activities in the first 3 years following the effective date of the rule are identified in Tables 5 through 7 and are introduced in Section 6(c).

5(b) Collection Methodology and Management

Following initial notification, the reviewing authority may 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 and ongoing capability to comply with the emission standard and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in

compliance and enforcement programs. 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 will be entered into the Air Facility System (AFS), which is operated and maintained by the EPA's Office of Compliance. The AFS is the EPA's database for the collection, maintenance and retrieval of air compliance data for over 125,000 industrial and government-owned facilities. The EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA Regional offices and EPA headquarters. The 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 or operator for 5 years.

5(c) Small Entity Flexibility

The EPA is concerned about the proposed rule's potential impacts on small entities, because 36 of 44 firms owning BSCP facilities have 750 or fewer employees and thus meet the Small Business Administration's (SBA's) criterion for a small entity in this industry (NAICS code 327120). Consequently, the EPA conducted a screening analysis of the potential impacts, by computing the ratio of control costs to firm sales revenues. Based on the results of the screening analysis, the EPA concluded that it is not able to certify that the rule will not have a Significant Impact on a Substantial Number of Small Entities (SISNOSE). Pursuant to section 603 of the Regulatory Flexibility Act (RFA), the EPA undertook an Initial Regulatory Flexibility Analysis (IRFA) that examined the impact of the BSCP proposed rule on small entities along with regulatory alternatives that could reduce that impact. The EPA also convened a Small Business Advisory Review panel to obtain advice and recommendations of representatives of the small entities that potentially would be subject to the BSCP proposed rule's requirements. All of the panel's recommendations were addressed in the BSCP proposed rule. As required by section 604 of the RFA, the EPA prepared a Final Regulatory Flexibility Analysis (FRFA) for the BSCP final rule. The FRFA addresses the issues raised by public comments on the IRFA for the BSCP proposed rule.

The BSCP rule will allow the affected facilities up to 3 years from the effective date of the rule to comply. Under CAA section 112(i), the Administrator or the applicable regulatory authority also may grant 1 additional year if the owner or operator demonstrates that more time is needed to install controls for a source. This additional time will ease capital availability problems for plants in marginal economic condition that need to purchase and install new or upgraded emission controls.

5(d) Collection Schedule

Collection of data will begin after the effective date of the final BSCP manufacturing NESHAP. The compliance date for existing sources is 3 years after the effective date. The compliance date for new or reconstructed sources is the effective date if the source startup date is

before the effective date, or upon startup if the startup date is on or after the effective date. The schedule for notifications and reports required by the rule is summarized below.

For facilities with existing affected kilns, the initial notification stating that the facility is subject to the rule must be submitted no later than 120 days after the effective date of the rule. Facilities with new or reconstructed affected kilns for which startup occurs on or after the effective date must submit the initial notification no later than 120 days after the source becomes subject to the rule (although we are projecting no new kilns in the short term). Facilities may choose to submit a request to use the routine control device maintenance alternative standard no later than 120 days prior to the compliance date. Facilities required to conduct a performance test must submit a notification of intent to conduct a performance test at least 60 days before the performance test is scheduled to begin. For each initial compliance demonstration that includes a performance test, facilities must submit an initial notification of compliance status no later than 60 days following the completion of the performance test. For each initial compliance demonstration that does not involve a performance test, facilities must submit an initial notification within 30 days of completing the initial compliance demonstration. Records necessary to determine compliance with the emission limitations and work practice standards must be compiled on a daily basis and compliance reports must be submitted to the Administrator on a semi-annual basis. Repeat performance tests are to be conducted every 5 years to ensure ongoing compliance.

6. Estimating the Burden and Cost of the Collection

6(a) Estimating Respondent Burden

The annual burden estimates for reporting and recordkeeping activities for the first 3 years after the effective date of the rule are presented in Tables 1 through 3. These numbers were derived from estimates based on Agency knowledge and experience with part 63 and other regulations, and BSCP industry comments on the proposed rule, including burden estimates from a recent BIA survey of the BSCP industry.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

The information collection activities for sources subject to the standards are presented in Tables 1 through 3. Labor costs for reporting and recordkeeping activities were estimated based on the most recently available labor rate data from the U.S. Bureau of Labor Statistics (BLS) for NAICS code 327100—Clay Product and Refractory Manufacturing (http://www.bls.gov/oes/2013/may/naics4_327100.htm).[1] Labor costs are divided into the following three categories: (1) technical; (2) management; and (3) clerical. The labor rates, including fringe benefits, reported by BLS for May 2013 (the most recent rates available) are $25.32 per hour ($25.32/hr) for technical personnel, $42.17/hr for management personnel and $15.19/hr for clerical personnel. The base labor rates were adjusted by an overhead rate of

[1] Occupational employment statistics in BLS are provided at a higher NAICS code level (327100), compared to the NAICS code (327120) specified in Sections 4(a) and 5(c).

110 percent. The final total labor rates are $53.17 for technical personnel, $88.56 for management and $31.90 for clerical.

(ii) Estimating Capital/Startup and O&M Costs

Capital/startup costs include the costs of conducting initial and repeat performance tests. Operation and maintenance (O&M) costs include photocopy and postage costs associated with reporting requirements and costs associated with VE monitoring. The O&M costs for VE monitoring include training for VE testing for two people every 5 years, conducting the 15-minute VE test and preparing for/documenting the VE test. The monitoring equipment needed to monitor parameters other than VE (e.g., lime or limestone feed rate) is included as part of the control system and, therefore, adds no additional capital or O&M cost. No capital/startup costs were expected to be incurred during the first 3 years after the effective date of the rule.

6(c) Estimating Agency Burden and Cost

No costs can be attributed to the development of the information collection requirements because the information collection requirements were developed as an incidental part of standards development. Because reporting and recordkeeping requirements on the part of the respondents are required under section 112 of the CAA, no operational costs will be incurred by the federal government. Publication and distribution of the information are part of the AFS program, with the result that no federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of sources that is part of the EPA's overall compliance and enforcement program. Therefore, this examination is not attributable to the ICR. The only costs that the federal government will incur are user costs associated with the analysis of the reported information, as presented in Tables 5 through 7.

Labor rates for federal employees are based on the January 2012, Office of Personnel Management labor rates for General Schedule employees (http://www.opm.gov/oca/12tables/pdf/gs_h.pdf). The base labor rates are $32.73/hr for technical personnel (GS-12, step 5), $54.10/hr for management personnel (GS-15, step 5) and $18.45/hr for clerical personnel (GS-7, step 5). The base labor rates were multiplied by the standard government benefits multiplication factor of 1.6. The resulting average hourly labor costs are $52.37/hr for technical personnel, $86.56/hr for management and $29.52/hr for clerical.

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

Once the burden and costs per activity have been established on a per respondent basis, the total burden and cost must be calculated for all respondents and for the Agency. To calculate the total burden and costs, the number of respondents needed to complete each information collection activity must be estimated. The total number of respondents is also referred to as the "respondent universe." Based on analyses of information collected from industry surveys, operating permits and test reports, the EPA is projecting that 69 existing BSCP major source facilities will be subject to the BSCP rule, assuming that 22 BSCP facilities will become synthetic area sources rather than comply with the rule. Of these 69 facilities, 63 are equipped with tunnel kilns, 15 with periodic kilns, and 24 with APCDs. Based on the latest BSCP industry

profile, no new BSCP facilities or kilns are expected to be constructed in the near future, and existing capacity is assumed to be sufficient to cover any short-term increases in production.

6(e) Bottom Line Burden Hours and Costs/Master Tables

(i) Respondent Tally

The bottom line annual respondent burden hours and costs, presented in Tables 1 through 3 (one table for each year), are calculated by adding person-hours per year down each column for technical, managerial and clerical staff and by adding down the cost column. Table 4 summarizes the respondent burden hours and costs for each of the 3 years and presents the total and average burden over the 3-year period. The total number of responses over the 3-year period is 93, with an average of 31 responses per year. The estimated total burden for the 3-year period is 62,890 labor hours at a labor cost of $3,339,316. The average bottom line annual burden over the 3-year period is 20,963 labor hours at a labor cost of $1,113,105. There are no capital/startup costs that would be incurred during the 3 years following the effective date of the rule. The total annual O&M cost for the 3-year period is estimated to be $2,046, with an average of $682 incurred each year in the 3 years following the effective date.

(ii) The Agency Tally

The bottom line Agency burden hours and costs, presented in Tables 5 through 7, are calculated as in the respondent table, by adding person-hours per year down each column for technical, managerial and clerical staff and by adding down the cost column. In this case, total cost is the sum of this total salary cost and total travel expenses for tests attended. Table 8 summarizes the Agency burden hours and costs for each of the 3 years and presents the total and average burden over the 3-year period. The total hours during the 3-year ICR review period are 214, with an average of 71 hours per year. The total cost over the 3-year period is $11,095. The average annual cost incurred during each year is $3,698.

(iii) Variations in the Annual Bottom Line

Respondent and Agency costs and labor hours vary from year to year because: (1) existing facilities are not required to come into full compliance with the BSCP standards until 3 years after the effective date of the rule and (2) different one-time activities would be conducted during the first years following the effective date. During the first year, existing sources are required to submit an initial notification. There are no monitoring, reporting and recordkeeping activities during the second year for existing sources. In the third year, existing facilities are likely to be conducting one-time activities such as developing their OM&M plans, developing a record system and training personnel on how to record information. Facilities may also choose to submit a request to use the routine control device maintenance alternative standard during the third year.

Because existing facilities are not required to come into full compliance with the BSCP standards until 3 years after the effective date and no new BSCP kilns are anticipated to be constructed in the near future, much of the respondent burden does not occur until the fourth year following the effective date. Attachment 1 contains tables showing respondent and Agency burden estimates for the fourth, fifth and sixth years following the effective date. During the

fourth year when existing facilities are required to come into full compliance, the facilities would conduct inspections, submit a notification of intent to conduct a performance test, conduct an initial performance test (and, if necessary, a repeat performance test), submit a notification of compliance status, submit their test data to the EPA through EPA's electronic reporting tool (ERT), submit their first compliance report and keep records of compliance data and malfunctions. During subsequent years, existing facilities would continue to keep records and submit semi-annual reports. After the fourth year, burden estimates are not expected to vary considerably from year to year because facilities will be conducting ongoing activities (e.g., semi-annual compliance reports, recordkeeping, inspecting every 3 years, retesting every 5 years) as opposed to the one-time activities (e.g., developing OM&M plan, submitting notifications) that occur in the first 4 years following the effective date.

6(f) Reasons for Change in Burden

This section does not apply because this is a new collection.

6(g) Burden Statement

The average annual public reporting and recordkeeping burden for this collection of information is estimated to average 676 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 currently valid OMB control number. The OMB control numbers for the EPA's regulations are listed in 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, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2013-0291. An electronic version of the public docket is available at http://www.regulations.gov/ which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the content of the docket and to access those documents in the public docket that are available electronically. When in the system, select "search" than key in the docket ID number identified in this document. The documents are also available for public viewing at the EPA Docket Center, Room 3334, EPA WJC West Building, 1301 Constitution Avenue, 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) 566-1742. Send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention:

Desk Officer for EPA, 725 17th Street, NW, Washington, DC 20503. Please include the EPA Docket ID Number EPA-HQ-OAR-2013-0291 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because statistical methods are not used in data collection associated with the rule.

Table 1. Annual Respondent Burden and Cost of Reporting and Recordkeeping Requirements of the BSCP NESHAP - Year 1

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read and understand rule requirements [d]	12	1	12	69	414	414	0	$58,676
B. Required activities								
Develop OM&M plan [e]	200	1	200	0	0	0	0	$0
Update OM&M plan	10	1	10	0	0	0	0	$0
Conduct APCD maintenance/inspections	30	1	30	0	0	0	0	$0
Conduct periodic kiln maintenance/ inspections	160	1	160	0	0	0	0	$0
Conduct burner inspection and tune-up	40	1	40	0	0	0	0	$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Initial notification of applicability [e]	6	1	6	69	414	21	41	$25,167
Notification of constr./reconstr. [e]	28	1	28	0	0	0	0	$0
Notification of anticipated startup [e]	3	1	3	0	0	0	0	$0
Notification of actual startup [e]	3	1	3	0	0	0	0	$0
Request to use APCD maintenance alternative standard [e]	4	1	4	0	0	0	0	$0
Notification of performance test	6	1	6	0	0	0	0	$0
Notification of compliance status [e,f]	24	1	24	0	0	0	0	$0
Report of performance test (through ERT)	20	1	20	0	0	0	0	$0
First compliance report	30	1	30	0	0	0	0	$0
Semi-annual compliance reports								
Deviations [g]	30	2	60	0	0	0	0	$0
No deviations [g]	12	2	24	0	0	0	0	$0

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities								
Prepare for initial performance test	24	1	24	0	0	0	0	$0
Prepare for repeat performance test	24	1	24	0	0	0	0	$0
C. Implement activities								
Attend initial performance test [h]	34	2.5	85	0	0	0	0	$0
Attend repeat performance test [h]	34	2.5	85	0	0	0	0	$0
D. Develop record system	60	6	360	0	0	0	0	$0
E. Time to enter information								
Records of compliance data	8	52	416	0	0	0	0	$0
Records of APCD maintenance/ inspections	See 3B							
Records of compliance with work practices	See 3B							
Records of deviations	2	12	24	0	0	0	0	$0
F. Time to train personnel [i]								
Initial training	48	6	288	0	0	0	0	$0
Annual training	10	6	60	0	0	0	0	$0
G. Time to transmit/disclose information [j]	0.25	1	0.25	69	17	0.9	1.7	$1,049
TOTAL ANNUAL BURDEN AND COST (SALARY)					**845**	**436**	**43**	**$84,891**
TOTAL ANNUAL NUMBER OF RESPONSES [k]				**69**				
CAPITAL COSTS:								
Initial performance tests [l]								$0
Repeat performance tests [m]								$0
Total capital cost								**$0**

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
ANNUALIZED CAPITAL COSTS: [n]								
Initial performance tests [l]								$0
Repeat performance tests [m]								$0
Total annualized capital cost								**$0**
ANNUAL O&M COSTS [o]								
Photocopy/postage								$1,518
Visible emissions tests [l]								$0
Total O&M cost								**$1,518**
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								**$1,518**

[a] Person-hours per occurrence were derived based on comments from industry.

[b] A total of 69 existing major sources are expected to comply during the 3-year ICR clearance period, of which 63 are equipped with tunnel kilns, 15 with periodic kilns, and 24 with APCDs. Based on the latest BSCP industry profile, no new kilns are anticipated to be constructed in the near future, and existing capacity is assumed sufficient to cover any short-term increases in production.

[c] Costs are based on the following hourly rates: technical at $53.17, management at $88.56, and clerical at $31.90. Management person-hours and clerical person hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

[d] Assumes one-time burden of 12 hours (based on an average reading rate of 100 words/minute) to read and understand rule requirements, divided equally among technical and management staff.

[e] One-time only activities.

[f] The notification of compliance status includes the performance test report and documentation of any other initial compliance demonstration. The cost burden associated with developing the performance test report is included in the performance test capital cost at the bottom of the table.

[g] Assumes 15% of respondents have deviations to report in semiannual compliance reports, and 85% report no deviations.

[h] Assumes 10% of plants fail initial performance test and must repeat it. Based on comments from industry, an average of 2.5 plant personnel attend performance tests. Assume no travel for plant personnel. Repeat testing is also required 5 years following initial testing.

[i] Based on comments from industry, assumes 48 hours of initial training and 10 hours of annual training for 6 plant personnel.

[j] Time associated with transmitting reports. Equal to the number of respondents submitting reports.

[k] The total annual number of responses is calculated by summing the product of columns B and D for each of the reports listed in 3E.

[l] Based on estimates in BSCP Impacts Memo. Stack testing costs assume EPA Method 29 for PM/metals and EPA Method 26A for HF, HCl, and Cl_2. VE testing costs assume EPA Method 22.

[m] Assumes 10% of plants will fail an initial performance test for one kiln and must repeat it.

[n] Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. $CRF=(i)*(1+i)^t/((1+i)^t-1)$ where i = interest rate (%) and t = equipment life (years).

[o] O&M costs for photocopying and postage estimated as $22/report. The monitoring equipment needed to monitor parameters other than visible emissions (e.g., limestone or lime feed rate) is included as part of the control system and therefore adds no additional capital or O&M cost. The O&M cost associated with VE monitoring includes VE training for two people every 5 years, conducting the 15-minute VE test, and preparing for/documenting the VE test (occurs after 3-year ICR clearance period).

N/A = Not Applicable.

Table 2. Annual Respondent Burden and Cost of Reporting and Recordkeeping Requirements of the BSCP NESHAP - Year 2

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read and understand rule requirements [d]	12	1	12	0	0	0	0	$0
B. Required activities								
Develop OM&M plan [e]	200	1	200	0	0	0	0	$0
Update OM&M plan	10							
Conduct APCD maintenance/inspections	30	1	30	0	0	0	0	$0
Conduct periodic kiln maintenance/ inspections	160	1	160	0	0	0	0	$0
Conduct burner inspection and tune-up	40	1	40	0	0	0	0	$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Initial notification of applicability [e]	6	1	6	0	0	0	0	$0
Notification of constr./reconstr. [e]	28	1	28	0	0	0	0	$0
Notification of anticipated startup [e]	3	1	3	0	0	0	0	$0
Notification of actual startup [e]	3	1	3	0	0	0	0	$0
Request to use APCD maintenance alternative standard [e]	4	1	4	0	0	0	0	$0
Notification of performance test	6	1	6	0	0	0	0	$0
Notification of compliance status [e,f]	24	1	24	0	0	0	0	$0
Report of performance test (through ERT)	20	1	20	0	0	0	0	$0
First compliance report	30	1	30	0	0	0	0	$0
Semi-annual compliance reports								
Deviations [g]	30	2	60	0	0	0	0	$0

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
No deviations [g]	12	2	24	0	0	0	0	$0
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities								
Prepare for initial performance test	24	1	24	0	0	0	0	$0
Prepare for repeat performance test	24	1	24	0	0	0	0	$0
C. Implement activities								
Attend initial performance test [h]	34	2.5	85	0	0	0	0	$0
Attend repeat performance test [h]	34	2.5	85	0	0	0	0	$0
D. Develop record system	60	6	360	0	0	0	0	$0
E. Time to enter information								
Records of compliance data	8	52	416	0	0	0	0	$0
Records of APCD maintenance/ inspections	See 3B							
Records of compliance with work practices	See 3B							
Records of deviations	2	12	24	0	0	0	0	$0
F. Time to train personnel [i]								
Initial training	48	6	288	0	0	0	0	$0
Annual training	10	6	60	0	0	0	0	$0
G. Time to transmit/disclose information [j]	0.25	1	0.25	0	0	0	0	$0
TOTAL ANNUAL BURDEN AND COST (SALARY)					**0**	**0**	**0**	**$0**
TOTAL ANNUAL NUMBER OF RESPONSES [k]				**0**				
CAPITAL COSTS:								
Initial performance tests [l]								$0
Repeat performance tests [m]								$0
Total capital cost								**$0**

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
ANNUALIZED CAPITAL COSTS: [n]								
Initial performance tests [l]								$0
Repeat performance tests [m]								$0
Total annualized capital cost								**$0**
ANNUAL O&M COSTS [o]								
Photocopy/postage								$0
Visible emissions tests [l]								$0
Total O&M cost								**$0**
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								**$0**

[a] Person-hours per occurrence were derived based on comments from industry.

[b] A total of 69 existing major sources are expected to comply during the 3-year ICR clearance period, of which 63 are equipped with tunnel kilns, 15 with periodic kilns, and 24 with APCDs. Based on the latest BSCP industry profile, no new kilns are anticipated to be constructed in the near future, and existing capacity is assumed sufficient to cover any short-term increases in production.

[c] Costs are based on the following hourly rates: technical at $53.17, management at $88.56, and clerical at $31.90. Management person-hours and clerical person hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

[d] Assumes one-time burden of 12 hours (based on an average reading rate of 100 words/minute) to read and understand rule requirements, divided equally among technical and management staff.

[e] One-time only activities.

[f] The notification of compliance status includes the performance test report and documentation of any other initial compliance demonstration. The cost burden associated with developing the performance test report is included in the performance test capital cost at the bottom of the table.

[g] Assumes 15% of respondents have deviations to report in semiannual compliance reports, and 85% report no deviations.

[h] Assumes 10% of plants fail initial performance test and must repeat it. Based on comments from industry, an average of 2.5 plant personnel attend performance tests. Assume no travel for plant personnel. Repeat testing is also required 5 years following initial testing.

[i] Based on comments from industry, assumes 48 hours of initial training and 10 hours of annual training for 6 plant personnel.

[j] Time associated with transmitting reports. Equal to the number of respondents submitting reports.

[k] The total annual number of responses is calculated by summing the product of columns B and D for each of the reports listed in 3E.

[l] Based on estimates in BSCP Impacts Memo. Stack testing costs assume EPA Method 29 for PM/metals and EPA Method 26A for HF, HCl, and Cl_2. VE testing costs assume EPA Method 22.

[m] Assumes 10% of plants will fail an initial performance test for one kiln and must repeat it.

[n] Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. $CRF=(i)*(1+i)^t/((1+i)^t-1)$ where i = interest rate (%) and t = equipment life (years).

[o] O&M costs for photocopying and postage estimated as $22/report. The monitoring equipment needed to monitor parameters other than visible emissions (e.g., limestone or lime feed rate) is included as part of the control system and therefore adds no additional capital or O&M cost. The O&M cost associated with VE monitoring includes VE training for two people every 5 years, conducting the 15-minute VE test, and preparing for/documenting the VE test (occurs after 3-year ICR clearance period).

N/A = Not Applicable.

Table 3. Annual Respondent Burden and Cost of Reporting and Recordkeeping Requirements of the BSCP NESHAP - Year 3

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read and understand rule requirements [d]	12	1	12	0	0	0	0	$0
B. Required activities								
Develop OM&M plan [e]	200	1	200	63	12,600	630	1,260	$765,951
Update OM&M plan	10	1	10	0	0	0	0	$0
Conduct APCD maintenance/inspections	30	1	30	0	0	0	0	$0
Conduct periodic kiln maintenance/ inspections	160	1	160	0	0	0	0	$0
Conduct burner inspection and tune-up	40	1	40	0	0	0	0	$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Initial notification of applicability [e]	6	1	6	0	0	0	0	$0
Notification of constr./reconstr. [e]	28	1	28	0	0	0	0	$0
Notification of anticipated startup [e]	3	1	3	0	0	0	0	$0
Notification of actual startup [e]	3	1	3	0	0	0	0	$0
Request to use APCD maintenance alternative standard [e]	4	1	4	24	96	4.8	10	$5,836
Notification of performance test	6	1	6	0	0	0	0	$0
Notification of compliance status [e,f]	24	1	24	0	0	0	0	$0
Report of performance test (through ERT)	20	1	20	0	0	0	0	$0
First compliance report	30	1	30	0	0	0	0	$0
Semi-annual compliance reports								
Deviations [g]	30	2	60	0	0	0	0	$0

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
No deviations [g]	12	2	24	0	0	0	0	$0
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities								
Prepare for initial performance test	24	1	24	0	0	0	0	$0
Prepare for repeat performance test	24	1	24	0	0	0	0	$0
C. Implement activities								
Attend initial performance test [h]	34	2.5	85	0	0	0	0	$0
Attend repeat performance test [h]	34	2.5	85	0	0	0	0	$0
D. Develop record system	60	6	360	63	22,680	1,134	2,268	$1,378,712
E. Time to enter information								
Records of compliance data	8	52	416	0	0	0	0	$0
Records of APCD maintenance/ inspections	See 3B							
Records of compliance with work practices	See 3B							
Records of deviations	2	12	24	0	0	0	0	$0
F. Time to train personnel [i]								
Initial training	48	6	288	63	18,144	907	1,814	$1,102,969
Annual training	10	6	60	0	0	0	0	$0
G. Time to transmit/disclose information [j]	0.25	1	0.25	63	16	0.8	1.6	$957
TOTAL ANNUAL BURDEN AND COST (SALARY)					**53,536**	**2,677**	**5,354**	**$3,254,425**
TOTAL ANNUAL NUMBER OF RESPONSES [k]				**24**				
CAPITAL COSTS:								
Initial performance tests [l]								$0
Repeat performance tests [m]								$0
Total capital cost								**$0**

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
ANNUALIZED CAPITAL COSTS: [n]								
Initial performance tests [l]								$0
Repeat performance tests [m]								$0
Total annualized capital cost								**$0**
ANNUAL O&M COSTS [o]								
Photocopy/postage								$528
Visible emissions tests [l]								$0
Total O&M cost								**$528**
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								**$528**

[a] Person-hours per occurrence were derived based on comments from industry.

[b] A total of 69 existing major sources are expected to comply during the 3-year ICR clearance period, of which 63 are equipped with tunnel kilns, 15 with periodic kilns, and 24 with APCDs. Based on the latest BSCP industry profile, no new kilns are anticipated to be constructed in the near future, and existing capacity is assumed sufficient to cover any short-term increases in production.

[c] Costs are based on the following hourly rates: technical at $53.17, management at $88.56, and clerical at $31.90. Management person-hours and clerical person hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

[d] Assumes one-time burden of 12 hours (based on an average reading rate of 100 words/minute) to read and understand rule requirements, divided equally among technical and management staff.

[e] One-time only activities.

[f] The notification of compliance status includes the performance test report and documentation of any other initial compliance demonstration. The cost burden associated with developing the performance test report is included in the performance test capital cost at the bottom of the table.

[g] Assumes 15% of respondents have deviations to report in semiannual compliance reports, and 85% report no deviations.

[h] Assumes 10% of plants fail initial performance test and must repeat it. Based on comments from industry, an average of 2.5 plant personnel attend performance tests. Assume no travel for plant personnel. Repeat testing is also required 5 years following initial testing.

[i] Based on comments from industry, assumes 48 hours of initial training and 10 hours of annual training for 6 plant personnel.

[j] Time associated with transmitting reports. Equal to the number of respondents submitting reports.

[k] The total annual number of responses is calculated by summing the product of columns B and D for each of the reports listed in 3E.

[l] Based on estimates in BSCP Impacts Memo. Stack testing costs assume EPA Method 29 for PM/metals and EPA Method 26A for HF, HCl, and Cl_2. VE testing costs assume EPA Method 22.

[m] Assumes 10% of plants will fail an initial performance test for one kiln and must repeat it.

[n] Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. $CRF=(i)*(1+i)^t/((1+i)^t-1)$ where i = interest rate (%) and t = equipment life (years).

[o] O&M costs for photocopying and postage estimated as $22/report. The monitoring equipment needed to monitor parameters other than visible emissions (e.g., limestone or lime feed rate) is included as part of the control system and therefore adds no additional capital or O&M cost. The O&M cost associated with VE monitoring includes VE training for two people every 5 years, conducting the 15-minute VE test, and preparing for/documenting the VE test (occurs after 3-year ICR clearance period).

N/A = Not Applicable.

Table 4. Summary of Respondent Burden and Cost of the BSCP NESHAP - Years 1 to 3

Year	No. responses	Technical hours	Management hours	Clerical Hours	Total hours	Labor costs	Non-Labor Costs			
							Capital	Annualized capital	Annual O&M	Total annualized cost
Year 1	69	845	436	43	1,324	$84,891	$0	$0	$1,518	$1,518
Year 2	0	0	0	0	0	$0	$0	$0	$0	$0
Year 3	24	53,536	2,677	5,354	61,566	$3,254,425	$0	$0	$528	$528
Totals	**93**	**54,381**	**3,112**	**5,397**	**62,890**	**$3,339,316**	**$0**	**$0**	**$2,046**	**$2,046**
Average	**31**				**20,963**	**$1,113,105**	**$0**	**$0**	**$682**	**$682**

Table 5. Annual Burden and Cost to the Federal Government of the BSCP NESHAP - Year 1

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [b]
1. Attend initial performance test [c]	24	1	24	0	0	0	0	$0
2. Attend repeat performance test [c,d]								
Retesting preparation	8	1	8	0	0	0	0	$0
Retesting	24	1	24	0	0	0	0	$0
3. Litigation [e]	2,080	1	2,080	0	0	0	0	$0
4. Excess emissions enforcement activities [f]	48	1	48	0	0	0	0	$0
5. Report review								
Initial notification of applicability	2	1	2	69	138	6.9	14	$8,231
Notification of constr./reconstr.	2	1	2	0	0	0	0	$0
Notification of anticipated startup	2	1	2	0	0	0	0	$0
Notification of actual startup	2	1	2	0	0	0	0	$0
Request to use APCD maintenance alternative standard	2	1	2	0	0	0	0	$0
Notification of performance test	2	1	2	0	0	0	0	$0
Notification of compliance status [g]	60	1	60	0	0	0	0	$0
Repeat performance test report [d]	40	1	40	0	0	0	0	$0
First compliance report	4	1	4	0	0	0	0	$0
Semi-annual compliance reports:								
Deviations [h]	8	2	16	0	0	0	0	$0
No deviations [h]	2	2	4	0	0	0	0	$0
TOTAL BURDEN AND COST (SALARY)					**138**	**6.9**	**14**	**$8,231**
Travel Expenses for Tests Attended [i]								**$0**
TOTAL ANNUAL COST (SALARY + EXPENSES)								**$8,231**

[a] A total of 69 existing major sources are expected to comply during the 3-year ICR clearance period, of which 63 are equipped with tunnel kilns, 15 with periodic kilns, and 24 with APCDs. Based on the latest BSCP industry profile, no new kilns are anticipated to be constructed in the near future, and existing capacity is assumed sufficient to cover any short-term increases in production.

[b] Costs are based on the following hourly rates: technical at $52.37, management at $86.56 and clerical at $29.52. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

[c] Assumes Agency personnel will attend performance tests at 10% of plants.

[d] Assumes 10% of plants will fail an initial performance test and must repeat it and assumes Agency personnel attend 10% of the repeat tests.

[e] Assumes 1% of plants will be involved in litigation.

[f] Assumes 5% of the plants are required to retest as a result of excess emissions and assumes Agency personnel attend all of the retests.

[g] Notification of compliance status includes the performance test report.

[h] Assumes 15% of the plants report deviations semiannually and 85% report no deviations.

[i] Assumes Agency personnel (1 person) will spend 2 days per plant plus time for travel, at $50 per diem per day, and $400 transportation expense per round trip to attend performance tests.

Table 6. Annual Burden and Cost to the Federal Government of the BSCP NESHAP - Year 2

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [b]
1. Attend initial performance test [c]	24	1	24	0	0	0	0	$0
2. Attend repeat performance test [c,d]								
Retesting preparation	8	1	8	0	0	0	0	$0
Retesting	24	1	24	0	0	0	0	$0
3. Litigation [e]	2,080	1	2,080	0	0	0	0	$0
4. Excess emissions enforcement activities [f]	48	1	48	0	0	0	0	$0
5. Report review								
Initial notification of applicability	2	1	2	0	0	0	0	$0
Notification of constr./reconstr.	2	1	2	0	0	0	0	$0
Notification of anticipated startup	2	1	2	0	0	0	0	$0
Notification of actual startup	2	1	2	0	0	0	0	$0
Request to use APCD maintenance alternative standard	2	1	2	0	0	0	0	$0
Notification of performance test	2	1	2	0	0	0	0	$0
Notification of compliance status [g]	60	1	60	0	0	0	0	$0
Repeat performance test report [d]	40	1	40	0	0	0	0	$0
First compliance report	4	1	4	0	0	0	0	$0
Semi-annual compliance reports:								
Deviations [h]	8	2	16	0	0	0	0	$0
No deviations [h]	2	2	4	0	0	0	0	$0
TOTAL BURDEN AND COST (SALARY)					**0**	**0**	**0**	**$0**
Travel Expenses for Tests Attended [i]								**$0**
TOTAL ANNUAL COST (SALARY + EXPENSES)								**$0**

[a] A total of 69 existing major sources are expected to comply during the 3-year ICR clearance period, of which 63 are equipped with tunnel kilns, 15 with periodic kilns, and 24 with APCDs. Based on the latest BSCP industry profile, no new kilns are anticipated to be constructed in the near future, and existing capacity is assumed sufficient to cover any short-term increases in production.

[b] Costs are based on the following hourly rates: technical at $52.37, management at $86.56 and clerical at $29.52. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

[c] Assumes Agency personnel will attend performance tests at 10% of plants.

[d] Assumes 10% of plants will fail an initial performance test and must repeat it and assumes Agency personnel attend 10% of the repeat tests.

[e] Assumes 1% of plants will be involved in litigation.

[f] Assumes 5% of the plants are required to retest as a result of excess emissions and assumes Agency personnel attend all of the retests.

[g] Notification of compliance status includes the performance test report.

[h] Assumes 15% of the plants report deviations semiannually and 85% report no deviations.

[i] Assumes Agency personnel (1 person) will spend 2 days per plant plus time for travel, at $50 per diem per day, and $400 transportation expense per round trip to attend performance tests.

Table 7. Annual Burden and Cost to the Federal Government of the BSCP NESHAP - Year 3

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [b]
1. Attend initial performance test [c]	24	1	24	0	0	0	0	$0
2. Attend repeat performance test [c,d]								
Retesting preparation	8	1	8	0	0	0	0	$0
Retesting	24	1	24	0	0	0	0	$0
3. Litigation [e]	2,080	1	2,080	0	0	0	0	$0
4. Excess emissions enforcement activities [f]	48	1	48	0	0	0	0	$0
5. Report review								
Initial notification of applicability	2	1	2	0	0	0	0	$0
Notification of constr./reconstr.	2	1	2	0	0	0	0	$0
Notification of anticipated startup	2	1	2	0	0	0	0	$0
Notification of actual startup	2	1	2	0	0	0	0	$0
Request to use APCD maintenance alternative standard	2	1	2	24	48	2.4	4.8	$2,863
Notification of performance test	2	1	2	0	0	0	0	$0
Notification of compliance status [g]	60	1	60	0	0	0	0	$0
Repeat performance test report [d]	40	1	40	0	0	0	0	$0
First compliance report	4	1	4	0	0	0	0	$0
Semi-annual compliance reports:								
Deviations [h]	8	2	16	0	0	0	0	$0
No deviations [h]	2	2	4	0	0	0	0	$0
TOTAL BURDEN AND COST (SALARY)					**48**	**2.4**	**4.8**	**$2,863**
Travel Expenses for Tests Attended [i]								**$0**
TOTAL ANNUAL COST (SALARY + EXPENSES)								**$2,863**

[a] A total of 69 existing major sources are expected to comply during the 3-year ICR clearance period, of which 63 are equipped with tunnel kilns, 15 with periodic kilns, and 24 with APCDs. Based on the latest BSCP industry profile, no new kilns are anticipated to be constructed in the near future, and existing capacity is assumed sufficient to cover any short-term increases in production.

[b] Costs are based on the following hourly rates: technical at $52.37, management at $86.56 and clerical at $29.52. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

[c] Assumes Agency personnel will attend performance tests at 10% of plants.

[d] Assumes 10% of plants will fail an initial performance test and must repeat it and assumes Agency personnel attend 10% of the repeat tests.

[e] Assumes 1% of plants will be involved in litigation.

[f] Assumes 5% of the plants are required to retest as a result of excess emissions and assumes Agency personnel attend all of the retests.

[g] Notification of compliance status includes the performance test report.

[h] Assumes 15% of the plants report deviations semiannually and 85% report no deviations.

[i] Assumes Agency personnel (1 person) will spend 2 days per plant plus time for travel, at $50 per diem per day, and $400 transportation expense per round trip to attend performance tests.

Table 8. Summary of Burden and Cost to the Federal Government of the BSCP NESHAP - Years 1 to 3

Year	Technical hours	Management hours	Clerical Hours	Total hours	Labor costs
Year 1	138	6.9	14	159	$8,231
Year 2	0	0	0	0	$0
Year 3	138	2.4	4.8	55	$2,863
Totals	**186**	**9.3**	**19**	**214**	**$11,095**
Average				**71**	**$3,698**

Attachment 1

Annual Burden and Cost – Years 4 to 6

Table 1-1. Annual Respondent Burden and Cost of Reporting and Recordkeeping Requirements of the BSCP NESHAP - Year 4

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read and understand rule requirements [d]	12	1	12	0	0	0	0	$0
B. Required activities								
Develop OM&M plan [e]	200	1	200	0	0	0	0	$0
Update OM&M plan	10	1	10	63	630	32	63	$56,796
Conduct APCD maintenance/inspections	30	1	30	24	720	36	72	$43,769
Conduct periodic kiln maintenance/ inspections	160	1	160	15	2,400	120	240	$145,895
Conduct burner inspection and tune-up	40	1	40	63	2,520	126	252	$153,190
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Initial notification of applicability [e]	6	1	6	0	0	0	0	$0
Notification of constr./reconstr. [e]	28	1	28	0	0	0	0	$0
Notification of anticipated startup [e]	3	1	3	0	0	0	0	$0
Notification of actual startup [e]	3	1	3	0	0	0	0	$0
Request to use APCD maintenance alternative standard [e]	4	1	4	0	0	0	0	$0
Notification of performance test	6	1	6	63	378	18.9	38	$22,979
Notification of compliance status [e,f]	24	1	24	69	1,656	83	166	$100,668
Report of performance test (through ERT)	20	1	20	63	1,260	63	126	$76,595
First compliance report	30	1	30	69	2,070	104	207	$125,835
Semi-annual compliance reports								
Deviations [g]	30	2	60	0	0	0	0	$0

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
No deviations [g]	12	2	24	0	0	0	0	$0
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities								
Prepare for initial performance test	24	1	24	63	1,512	76	151	$91,914
Prepare for repeat performance test	24	1	24	6.3	151	7.6	15.1	$9,191
C. Implement activities								
Attend initial performance test [h]	34	2.5	85	63	5,355	268	536	$325,529
Attend repeat performance test [h]	34	2.5	85	6.3	536	27	54	$32,553
D. Develop record system	60	6	360	0	0	0	0	$0
E. Time to enter information								
Records of compliance data	8	52	416	69	28,704	1,435	2,870	$1,744,909
Records of APCD maintenance/ inspections	See 3B							
Records of compliance with work practices	See 3B							
Records of deviations	2	12	24	69	1,656	83	166	$100,668
F. Time to train personnel [i]								
Initial training	48	6	288	0	0	0	0	$0
Annual training	10	6	60	63	3,780	189	378	$340,774
G. Time to transmit/disclose information [j]	0.25	1	0.25	69	17	0.9	1.7	$1,049
TOTAL ANNUAL BURDEN AND COST (SALARY)					**53,345**	**2,667**	**5,334**	**$3,372,313**
TOTAL ANNUAL NUMBER OF RESPONSES [k]				**264**				
CAPITAL COSTS:								
Initial performance tests [l]								$2,262,000
Repeat performance tests [m]								$226,200
Total capital cost								**$2,488,200**

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
ANNUALIZED CAPITAL COSTS: [n]								
Initial performance tests [l]								$551,600
Repeat performance tests [m]								$55,160
Total annualized capital cost								**$606,760**
ANNUAL O&M COSTS [o]								
Photocopy/postage								$5,808
Visible emissions tests [l]								$202,912
Total O&M cost								**$208,720**
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								**$815,480**

[a] Person-hours per occurrence were derived based on comments from industry.

[b] A total of 69 existing major sources are expected to comply during the 3-year ICR clearance period, of which 63 are equipped with tunnel kilns, 15 with periodic kilns, and 24 with APCDs. Based on the latest BSCP industry profile, no new kilns are anticipated to be constructed in the near future, and existing capacity is assumed sufficient to cover any short-term increases in production.

[c] Costs are based on the following hourly rates: technical at $53.17, management at $88.56, and clerical at $31.90. Management person-hours and clerical person hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

[d] Assumes one-time burden of 12 hours (based on an average reading rate of 100 words/minute) to read and understand rule requirements, divided equally among technical and management staff.

[e] One-time only activities.

[f] The notification of compliance status includes the performance test report and documentation of any other initial compliance demonstration. The cost burden associated with developing the performance test report is included in the performance test capital cost at the bottom of the table.

[g] Assumes 15% of respondents have deviations to report in semiannual compliance reports, and 85% report no deviations.

[h] Assumes 10% of plants fail initial performance test and must repeat it. Based on comments from industry, an average of 2.5 plant personnel attend performance tests. Assume no travel for plant personnel. Repeat testing is also required 5 years following initial testing.

[i] Based on comments from industry, assumes 48 hours of initial training and 10 hours of annual training for 6 plant personnel.

[j] Time associated with transmitting reports. Equal to the number of respondents submitting reports.

[k] The total annual number of responses is calculated by summing the product of columns B and D for each of the reports listed in 3E.

[l] Based on estimates in BSCP Impacts Memo. Stack testing costs assume EPA Method 29 for PM/metals and EPA Method 26A for HF, HCl, and Cl_2. VE testing costs assume EPA Method 22.

[m] Assumes 10% of plants will fail an initial performance test for one kiln and must repeat it.

[n] Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. $CRF=(i)*(1+i)^t/((1+i)^t-1)$ where i = interest rate (%) and t = equipment life (years).

[o] O&M costs for photocopying and postage estimated as $22/report. The monitoring equipment needed to monitor parameters other than visible emissions (e.g., limestone or lime feed rate) is included as part of the control system and therefore adds no additional capital or O&M cost. The O&M cost associated with VE monitoring includes VE training for two people every 5 years, conducting the 15-minute VE test, and preparing for/documenting the VE test (occurs after 3-year ICR clearance period).

N/A = Not Applicable.

Table 1-2. Annual Respondent Burden and Cost of Reporting and Recordkeeping Requirements of the BSCP NESHAP - Year 5

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read and understand rule requirements [d]	12	1	12	0	0	0	0	$0
B. Required activities								
Develop OM&M plan [e]	200	1	200	0	0	0	0	$0
Update OM&M plan	10	1	10	63	630	32	63	$56,796
Conduct APCD maintenance/ inspections	30	1	30	0	0	0	0	$0
Conduct periodic kiln maintenance/ inspections	160	1	160	0	0	0	0	$0
Conduct burner inspection and tune-up	40	1	40	0	0	0	0	$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Initial notification of applicability [e]	6	1	6	0	0	0	0	$0
Notification of constr./reconstr. [e]	28	1	28	0	0	0	0	$0
Notification of anticipated startup [e]	3	1	3	0	0	0	0	$0
Notification of actual startup [e]	3	1	3	0	0	0	0	$0
Request to use APCD maintenance alternative standard [e]	4	1	4	0	0	0	0	$0
Notification of performance test	6	1	6	0	0	0	0	$0
Notification of compliance status [e,f]	24	1	24	0	0	0	0	$0
Report of performance test (through ERT)	20	1	20	0	0	0	0	$0
First compliance report	30	1	30	0	0	0	0	$0
Semi-annual compliance reports								

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
Deviations [g]	30	2	60	10	621	31	62	$37,750
No deviations [g]	12	2	24	59	1,408	70	141	$85,568
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities								
Prepare for initial performance test	24	1	24	0	0	0	0	$0
Prepare for repeat performance test	24	1	24	0	0	0	0	$0
C. Implement activities								
Attend initial performance test [h]	34	2.5	85	0	0	0	0	$0
Attend repeat performance test [h]	34	2.5	85	0	0	0	0	$0
D. Develop record system	60	6	360	0	0	0	0	$0
E. Time to enter information								
Records of compliance data	8	52	416	69	28,704	1,435	2,870	$1,744,909
Records of APCD maintenance/ inspections	See 3B							
Records of compliance with work practices	See 3B							
Records of deviations	2	12	24	69	1,656	83	166	$100,668
F. Time to train personnel [i]								
Initial training	48	6	288	0	0	0	0	$0
Annual training	10	6	60	63	3,780	189	378	$340,774
G. Time to transmit/disclose information [j]	0.25	1	0.25	69	17	0.9	1.7	$1,049
TOTAL ANNUAL BURDEN AND COST (SALARY)					**36,816**	**1,841**	**3,682**	**$2,367,514**
TOTAL ANNUAL NUMBER OF RESPONSES [k]				**138**				
CAPITAL COSTS:								
Initial performance tests [l]								$0
Repeat performance tests [m]								$0

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
Total capital cost								**$0**
ANNUALIZED CAPITAL COSTS: [n]								
Initial performance tests [l]								$551,600
Repeat performance tests [m]								$55,160
Total annualized capital cost								**$606,760**
ANNUAL O&M COSTS [o]								
Photocopy/postage								$3,036
Visible emissions tests [l]								$202,912
Total O&M cost								**$205,948**
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								**$812,708**

[a] Person-hours per occurrence were derived based on comments from industry.
[b] A total of 69 existing major sources are expected to comply during the 3-year ICR clearance period, of which 63 are equipped with tunnel kilns, 15 with periodic kilns, and 24 with APCDs. Based on the latest BSCP industry profile, no new kilns are anticipated to be constructed in the near future, and existing capacity is assumed sufficient to cover any short-term increases in production.
[c] Costs are based on the following hourly rates: technical at $53.17, management at $88.56, and clerical at $31.90. Management person-hours and clerical person hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.
[d] Assumes one-time burden of 12 hours (based on an average reading rate of 100 words/minute) to read and understand rule requirements, divided equally among technical and management staff.
[e] One-time only activities.
[f] The notification of compliance status includes the performance test report and documentation of any other initial compliance demonstration. The cost burden associated with developing the performance test report is included in the performance test capital cost at the bottom of the table.
[g] Assumes 15% of respondents have deviations to report in semiannual compliance reports, and 85% report no deviations.
[h] Assumes 10% of plants fail initial performance test and must repeat it. Based on comments from industry, an average of 2.5 plant personnel attend performance tests. Assume no travel for plant personnel. Repeat testing is also required 5 years following initial testing.
[i] Based on comments from industry, assumes 48 hours of initial training and 10 hours of annual training for 6 plant personnel.
[j] Time associated with transmitting reports. Equal to the number of respondents submitting reports.
[k] The total annual number of responses is calculated by summing the product of columns B and D for each of the reports listed in 3E.
[l] Based on estimates in BSCP Impacts Memo. Stack testing costs assume EPA Method 29 for PM/metals and EPA Method 26A for HF, HCl, and Cl_2. VE testing costs assume EPA Method 22.
[m] Assumes 10% of plants will fail an initial performance test for one kiln and must repeat it.
[n] Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. $CRF=(i)*(1+i)^t/((1+i)^t-1)$ where i = interest rate (%) and t = equipment life (years).

[o] O&M costs for photocopying and postage estimated as $22/report. The monitoring equipment needed to monitor parameters other than visible emissions (e.g., limestone or lime feed rate) is included as part of the control system and therefore adds no additional capital or O&M cost. The O&M cost associated with VE monitoring includes VE training for two people every 5 years, conducting the 15-minute VE test, and preparing for/documenting the VE test (occurs after 3-year ICR clearance period).

N/A = Not Applicable.

Table 1-3. Annual Respondent Burden and Cost of Reporting and Recordkeeping Requirements of the BSCP NESHAP - Year 6

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read and understand rule requirements [d]	12	1	12	0	0	0	0	$0
B. Required activities								
Develop OM&M plan [e]	200	1	200	0	0	0	0	$0
Update OM&M plan	10	1	10	63	630	32	63	$56,796
Conduct APCD maintenance/ inspections	30	1	30	0	0	0	0	$0
Conduct periodic kiln maintenance/ inspections	160	1	160	0	0	0	0	$0
Conduct burner inspection and tune-up	40	1	40	0	0	0	0	$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Initial notification of applicability [e]	6	1	6	0	0	0	0	$0
Notification of constr./reconstr. [e]	28	1	28	0	0	0	0	$0
Notification of anticipated startup [e]	3	1	3	0	0	0	0	$0
Notification of actual startup [e]	3	1	3	0	0	0	0	$0
Request to use APCD maintenance alternative standard [e]	4	1	4	0	0	0	0	$0
Notification of performance test	6	1	6	0	0	0	0	$0
Notification of compliance status [e,f]	24	1	24	0	0	0	0	$0
Report of performance test (through ERT)	20	1	20	0	0	0	0	$0
First compliance report	30	1	30	0	0	0	0	$0
Semi-annual compliance reports								

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
Deviations [g]	30	2	60	10	621	31	62	$37,750
No deviations [g]	12	2	24	59	1,408	70	141	$85,568
4. Recordkeeping Requirements								
A. Read instructions	See 3A							
B. Plan activities								
Prepare for initial performance test	24	1	24	0	0	0	0	$0
Prepare for repeat performance test	24	1	24	0	0	0	0	$0
C. Implement activities								
Attend initial performance test [h]	34	2.5	85	0	0	0	0	$0
Attend repeat performance test [h]	34	2.5	85	0	0	0	0	$0
D. Develop record system	60	6	360	0	0	0	0	$0
E. Time to enter information								
Records of compliance data	8	52	416	69	28,704	1,435	2,870	$1,744,909
Records of APCD maintenance/ inspections	See 3B							
Records of compliance with work practices	See 3B							
Records of deviations	2	12	24	69	1,656	83	166	$100,668
F. Time to train personnel [i]								
Initial training	48	6	288	0	0	0	0	$0
Annual training	10	6	60	63	3,780	189	378	$340,774
G. Time to transmit/disclose information [j]	0.25	1	0.25	69	17.3	0.9	1.7	$1,049
TOTAL ANNUAL BURDEN AND COST (SALARY)					**36,816**	**1,841**	**3,682**	**$2,367,514**
TOTAL ANNUAL NUMBER OF RESPONSES [k]				**138**				
CAPITAL COSTS:								
Initial performance tests [l]								$0
Repeat performance tests [m]								$0

Burden item	(A) Person-hours per occurrence [a]	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=A×B)	(D) Respondents per year [b]	(E) Technical person-hours per year (E=C×D)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [c]
Total capital cost								**$0**
ANNUALIZED CAPITAL COSTS: [n]								
Initial performance tests [l]								$551,600
Repeat performance tests [m]								$55,160
Total annualized capital cost								**$606,760**
ANNUAL O&M COSTS [o]								
Photocopy/postage								$3,036
Visible emissions tests [l]								$202,912
Total O&M cost								**$205,948**
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								**$812,708**

[a] Person-hours per occurrence were derived based on comments from industry.
[b] A total of 69 existing major sources are expected to comply during the 3-year ICR clearance period, of which 63 are equipped with tunnel kilns, 15 with periodic kilns, and 24 with APCDs. Based on the latest BSCP industry profile, no new kilns are anticipated to be constructed in the near future, and existing capacity is assumed sufficient to cover any short-term increases in production.
[c] Costs are based on the following hourly rates: technical at $53.17, management at $88.56, and clerical at $31.90. Management person-hours and clerical person hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.
[d] Assumes one-time burden of 12 hours (based on an average reading rate of 100 words/minute) to read and understand rule requirements, divided equally among technical and management staff.
[e] One-time only activities.
[f] The notification of compliance status includes the performance test report and documentation of any other initial compliance demonstration. The cost burden associated with developing the performance test report is included in the performance test capital cost at the bottom of the table.
[g] Assumes 15% of respondents have deviations to report in semiannual compliance reports, and 85% report no deviations.
[h] Assumes 10% of plants fail initial performance test and must repeat it. Based on comments from industry, an average of 2.5 plant personnel attend performance tests. Assume no travel for plant personnel. Repeat testing is also required 5 years following initial testing.
[i] Based on comments from industry, assumes 48 hours of initial training and 10 hours of annual training for 6 plant personnel.
[j] Time associated with transmitting reports. Equal to the number of respondents submitting reports.
[k] The total annual number of responses is calculated by summing the product of columns B and D for each of the reports listed in 3E.
[l] Based on estimates in BSCP Impacts Memo. Stack testing costs assume EPA Method 29 for PM/metals and EPA Method 26A for HF, HCl, and Cl_2. VE testing costs assume EPA Method 22.
[m] Assumes 10% of plants will fail an initial performance test for one kiln and must repeat it.
[n] Annualized costs are calculated by multiplying the capital recovery factor (CRF) by the capital cost. $CRF=(i)*(1+i)^t/((1+i)^t-1)$ where i = interest rate (%) and t = equipment life (years).

[o] O&M costs for photocopying and postage estimated as $22/report. The monitoring equipment needed to monitor parameters other than visible emissions (e.g., limestone or lime feed rate) is included as part of the control system and therefore adds no additional capital or O&M cost. The O&M cost associated with VE monitoring includes VE training for two people every 5 years, conducting the 15-minute VE test, and preparing for/documenting the VE test (occurs after 3-year ICR clearance period).

N/A = Not Applicable.

Table 1-4. Summary of Respondent Burden and Cost of the BSCP NESHAP - Years 4 to 6

Year	No. responses	Technical hours	Management hours	Clerical Hours	Total hours	Labor costs	Non-Labor Costs			
							Capital	Annualized capital	Annual O&M	Total annualized cost
Year 4	264	53,345	2,667	5,334	61,347	$3,372,313	$2,488,200	$606,760	$208,720	$815,480
Year 5	138	36,816	1,841	3,682	42,338	$2,367,514	$0	$606,760	$205,948	$812,708
Year 6	138	36,816	1,841	3,682	42,338	$2,367,514	$0	$606,760	$205,948	$812,708
Totals	**540**	**126,977**	**6,349**	**12,698**	**146,023**	**$8,107,341**	**$2,488,200**	**$1,820,280**	**$620,616**	**$2,440,896**
Average	**180**				**48,674**	**$2,702,447**	**$829,400**	**$606,760**	**$206,872**	**$813,632**

Table 1-5. Annual Burden and Cost to the Federal Government of the BSCP NESHAP - Year 4

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [b]
1. Attend initial performance test [c]	24	1	24	6.3	151	7.6	15	$9,019
2. Attend repeat performance test [c,d]								
Retesting preparation	8	1	8	0.6	5.0	0.3	0.5	$301
Retesting	24	1	24	0.6	15	0.8	1.5	$902
3. Litigation [e]	2,080	1	2,080	0.6	1,310	66	131	$78,163
4. Excess emissions enforcement activities [f]	48	1	48	3.2	151	7.6	15	$9,019
5. Report review								
Initial notification of applicability	2	1	2	0	0	0	0	$0
Notification of constr./reconstr.	2	1	2	0	0	0	0	$0
Notification of anticipated startup	2	1	2	0	0	0	0	$0
Notification of actual startup	2	1	2	0	0	0	0	$0
Request to use APCD maintenance alternative standard	2	1	2	0	0	0	0	$0
Notification of performance test	2	1	2	63	126	6.3	13	$7,516
Notification of compliance status [g]	60	1	60	69	4,140	207	414	$246,943
Repeat performance test report [d]	40	1	40	6.3	252	13	25	$15,031
First compliance report	4	1	4	69	276	14	28	$16,463
Semi-annual compliance reports:								
Deviations [h]	8	2	16	0	0	0	0	$0
No deviations [h]	2	2	4	0	0	0	0	$0
TOTAL BURDEN AND COST (SALARY)					**6,427**	**321**	**643**	**$383,355**
Travel Expenses for Tests Attended [i]								**$5,040**
TOTAL ANNUAL COST (SALARY + EXPENSES)								**$388,395**

[a] A total of 69 existing major sources are expected to comply during the 3-year ICR clearance period, of which 63 are equipped with tunnel kilns, 15 with periodic kilns, and 24 with APCDs. Based on the latest BSCP industry profile, no new kilns are anticipated to be constructed in the near future, and existing capacity is assumed sufficient to cover any short-term increases in production.

[b] Costs are based on the following hourly rates: technical at $52.37, management at $86.56 and clerical at $29.52. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

[c] Assumes Agency personnel will attend performance tests at 10% of plants.

[d] Assumes 10% of plants will fail an initial performance test and must repeat it and assumes Agency personnel attend 10% of the repeat tests.

[e] Assumes 1% of plants will be involved in litigation.

[f] Assumes 5% of the plants are required to retest as a result of excess emissions and assumes Agency personnel attend all of the retests.

[g] Notification of compliance status includes the performance test report.

[h] Assumes 15% of the plants report deviations semiannually and 85% report no deviations.

[i] Assumes Agency personnel (1 person) will spend 2 days per plant plus time for travel, at $50 per diem per day, and $400 transportation expense per round trip to attend performance tests.

Table 1-6. Annual Burden and Cost to the Federal Government of the BSCP NESHAP - Year 5

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [b]
1. Attend initial performance test [c]	24	1	24	0	0	0	0	$0
2. Attend repeat performance test [c,d]								
Retesting preparation	8	1	8	0	0	0	0	$0
Retesting	24	1	24	0	0	0	0	$0
3. Litigation [e]	2,080	1	2,080	0.6	1,310	66	131	$78,163
4. Excess emissions enforcement activities [f]	48	1	48	3.2	151	7.6	15	$9,019
5. Report review								
Initial notification of applicability	2	1	2	0	0	0	0	$0
Notification of constr./reconstr.	2	1	2	0	0	0	0	$0
Notification of anticipated startup	2	1	2	0	0	0	0	$0
Notification of actual startup	2	1	2	0	0	0	0	$0
Request to use APCD maintenance alternative standard	2	1	2	0	0	0	0	$0
Notification of performance test	2	1	2	0	0	0	0	$0
Notification of compliance status [g]	60	1	60	0	0	0	0	$0
Repeat performance test report [d]	40	1	40	0	0	0	0	$0
First compliance report	4	1	4	0	0	0	0	$0
Semi-annual compliance reports:								
Deviations [h]	8	2	16	10	166	8.3	17	$9,878
No deviations [h]	2	2	4	59	235	12	23	$13,993
TOTAL BURDEN AND COST (SALARY)					**1,862**	**93**	**186**	**$111,053**
Travel Expenses for Tests Attended [i]								**$1,575**
TOTAL ANNUAL COST (SALARY + EXPENSES)								**$112,628**

[a] A total of 69 existing major sources are expected to comply during the 3-year ICR clearance period, of which 63 are equipped with tunnel kilns, 15 with periodic kilns, and 24 with APCDs. Based on the latest BSCP industry profile, no new kilns are anticipated to be constructed in the near future, and existing capacity is assumed sufficient to cover any short-term increases in production

[b] Costs are based on the following hourly rates: technical at $52.37, management at $86.56 and clerical at $29.52. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

[c] Assumes Agency personnel will attend performance tests at 10% of plants.

[d] Assumes 10% of plants will fail an initial performance test and must repeat it and assumes Agency personnel attend 10% of the repeat tests.

[e] Assumes 1% of plants will be involved in litigation.

[f] Assumes 5% of the plants are required to retest as a result of excess emissions and assumes Agency personnel attend all of the retests.

[g] Notification of compliance status includes the performance test report.

[h] Assumes 15% of the plants report deviations semiannually and 85% report no deviations.

[i] Assumes Agency personnel (1 person) will spend 2 days per plant plus time for travel, at $50 per diem per day, and $400 transportation expense per round trip to attend performance tests.

Table 1-7. Annual Burden and Cost to the Federal Government of the BSCP NESHAP - Year 6

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (E×0.05)	(G) Clerical person-hours per year (E×0.1)	(H) Cost,$ [b]
1. Attend initial performance test [c]	24	1	24	0	0	0	0	$0
2. Attend repeat performance test [c,d]								
Retesting preparation	8	1	8	0	0	0	0	$0
Retesting	24	1	24	0	0	0	0	$0
3. Litigation [e]	2,080	1	2,080	0.6	1,310	66	131	$78,163
4. Excess emissions enforcement activities [f]	48	1	48	3.2	151	7.6	15	$9,019
5. Report review								
Initial notification of applicability	2	1	2	0	0	0	0	$0
Notification of constr./reconstr.	2	1	2	0	0	0	0	$0
Notification of anticipated startup	2	1	2	0	0	0	0	$0
Notification of actual startup	2	1	2	0	0	0	0	$0
Request to use APCD maintenance alternative standard	2	1	2	0	0	0	0	$0
Notification of performance test	2	1	2	0	0	0	0	$0
Notification of compliance status [g]	60	1	60	0	0	0	0	$0
Repeat performance test report [d]	40	1	40	0	0	0	0	$0
First compliance report	4	1	4	0	0	0	0	$0
Semi-annual compliance reports:								
Deviations [h]	8	2	16	10	166	8.3	17	$9,878
No deviations [h]	2	2	4	59	235	12	23	$13,993
TOTAL BURDEN AND COST (SALARY)					**1,862**	**93**	**186**	**$111,053**
Travel Expenses for Tests Attended [i]								**$1,575**
TOTAL ANNUAL COST (SALARY + EXPENSES)								**$112,628**

[a] A total of 69 existing major sources are expected to comply during the 3-year ICR clearance period, of which 63 are equipped with tunnel kilns, 15 with periodic kilns, and 24 with APCDs. Based on the latest BSCP industry profile, no new kilns are anticipated to be constructed in the near future, and existing capacity is assumed sufficient to cover any short-term increases in production

[b] Costs are based on the following hourly rates: technical at $52.37, management at $86.56 and clerical at $29.52. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

[c] Assumes Agency personnel will attend performance tests at 10% of plants.

[d] Assumes 10% of plants will fail an initial performance test and must repeat it and assumes Agency personnel attend 10% of the repeat tests.

[e] Assumes 1% of plants will be involved in litigation.

[f] Assumes 5% of the plants are required to retest as a result of excess emissions and assumes Agency personnel attend all of the retests.

[g] Notification of compliance status includes the performance test report.

[h] Assumes 15% of the plants report deviations semiannually and 85% report no deviations.

[i] Assumes Agency personnel (1 person) will spend 2 days per plant plus time for travel, at $50 per diem per day, and $400 transportation expense per round trip to attend performance tests.

Table 1-8. Summary of Burden and Cost to the Federal Government of the BSCP NESHAP - Years 4 to 6

Year	Technical hours	Management hours	Clerical Hours	Total hours	Labor costs
Year 4	6,427	321	643	7,391	$388,395
Year 5	1,862	93	186	2,141	$112,628
Year 6	1,862	93	186	2,141	$112,628
Totals	**10,151**	**508**	**1,015**	**11,673**	**$613,651**
Average				**3,891**	**$204,550**