

Table 1: Annual Respondent Burden and Cost – NSPS for Portland Cement Plants (40 CFR 121.46)

Burden item	(A)	(B)	(C)	(D)	(E)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondent per year ^a	Technical person-hours per year (E=CxD)
1. Applications	N/A				
2. Surveys and studies	N/A				
3. Reporting requirements					
A. Familiarize with regulatory requirements ^c	1	1	1	92	92
B. Required activities					
Initial performance test ^d	36	1	36	2	72
Repeat performance test ^e	36	1	36	1	36
CEMS initial performance test ^f	8	1	8	2	16
CEMS quarterly inspections ^g	2	4	8	2	16
CEMS daily calibration drift tests ^h	0.3	330	99	2	198
Daily monitoring (CEMS) ⁱ	0.5	330	165	2	330
C. Create information	See 3B				
D. Gather existing information	See 3E				
E. Write report					
Notification of construction/reconstruction	2	1	2	2	4
Notification of actual startup	2	1	2	2	4
Notification of physical or operational change	2	1	2	2	4
Notification of demonstration of CEMS	2	1	2	2	4
Notification of initial performance test ^j	2	1.5	3	2	6
Report of performance test ^j	2	1.5	3	2	6
Semiannual reports ^k	24	2	48	92	4,416
Subtotal for Reporting Requirements					
4. Recordkeeping requirements					
A. Familiarize with regulatory requirements	See 3A				
B. Plan activities	See 3B				
C. Implement activities	See 3B				
D. Develop record system	N/A				
E. Time to enter information					
Daily production and kiln feed rates ^l	0.125	330	41.25	92	3,795
Data Collection ^m	0.1	330	33	92	3,036
Records of startup, shutdown malfunction ⁿ	1.5	1	1.5	92	138
F. Train personnel for CEMS maintenance ^o	16	2	32	2	64
G. Audits	16	1	16	0	0
Subtotal for Recordkeeping Requirements					
TOTAL LABOR BURDEN AND COST (rounded) ^p					
TOTAL CAPITAL AND O&M COST (rounded) ^p					
GRAND TOTAL (rounded) ^p					

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 92 existing plants, of sources over the three-year period of this ICR. However, we assume that two existing plants will undergo modification notifications and retesting.

^b This ICR uses the following labor rates: \$148.45 per hour for Executive, Administrative, and Managerial labor; \$121 hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March and Industry group. The rates are from column 1, Total Compensation. The rates have been increased by 110 percent employed by private industry.

^c We have assumed that all new and existing respondents will take one hour to familiarize with the regulatory requirem

^d We have assumed that each respondent will take 36 hours to perform initial performance tests.

^e We have assumed that one respondent will have to repeat initial performance tests..

^f We have assumed that it will take each respondent eight hours to perform a CEMS performance test.

^g We have assumed that it will take each respondent 2 hours 4 times per year to perform CEMS inspections.

^h We have assumed that it will take each respondent 0.3 hours 330 times per year to perform daily calibration drift test

ⁱ We have assumed that it will take each respondent 0.5 hours 330 times per year to perform daily CEMS monitoring.

^j There will be a total of 3 performance tests per year (2 initial and 1 repeat) for two existing plants undergoing modifi

^k We have assumed that it will take each respondent 24 hours two times per year to prepare semiannual reports.

^l We have assumed that it will take each respondent 0.125 hours 330 times per year to enter daily production and kiln f

^m We have assumed that it will take each respondent 0.1 hours 330 times per year to enter data collection information.

ⁿ We have assumed that it will take each respondent 1.5 hours once per year to record SSM.

^o We have assumed that it will take respondents 16 hours twice a year to train personnel on how to maintain the CEMS

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

Part 60, Subpart F) (Renewal)

148.45 60.23

(F)	(G)	(H)
Managem nt person/ hours per year (F=Ex0.05)	Clerical person hours per year (G=Ex0.1)	Total Cost per year ^b
4.6	9.2	\$12,411.31
3.6	7.2	\$9,713.20
1.8	3.6	\$4,856.60
0.8	1.6	\$2,158.49
0.8	1.6	\$2,158.49
9.9	19.8	\$26,711.29
16.5	33	\$44,518.82
0.2	0.4	\$539.62
0.2	0.4	\$539.62
0.2	0.4	\$539.62
0.2	0.4	\$539.62
0.3	0.6	\$809.43
0.3	0.6	\$809.43
220.8	441.6	\$595,742.69
5,985		\$702,048
189.75	379.5	\$511,966.37
151.8	303.6	\$409,573.10
6.9	13.8	\$18,616.96
3.2	6.4	\$8,633.95
0	0	\$0
8,088		\$948,790
14,100		\$1,650,000
		\$744,000
		\$2,390,000

responses hr/response
198 71

operating 125 kilns. There will be no additional
1 or reconstruction which will require re-submittal or

.46 per hour for Technical labor, and \$60.23 per
1 2020, Table 2. Civilian Workers, by Occupational
to account for the benefit packages available to those

rents each year.

s.

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

feed rates information.

3.

Table 2: Average Annual EPA Burden and Cost – NSPS for Portland Cement Plants (40 CFR Part 60.72 50.72 68.37)

Activity	(A)	(B)	(C)	(D)	(E)	(F)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year ^a	Technical person-hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)
Report review						
Notification of construction/reconstruction ^c	2	1	2	2	4	0.2
Notification of actual startup ^{c,d}	0.5	1	0.5	2	1	0.05
Notification of physical and operational change ^c	2	1	2	2	4	0.2
Notification of demonstration of CEMS	2	1	2	2	4	0.2
Notification of initial performance test ^{c,e}	0.5	1.5	0.75	2	1.5	0.075
Review test results ^{c,f}	8	1.5	12	2	24	1.2
Review of semiannual reports ^g	4	2	8	92	736	36.8
TOTAL LABOR BURDEN AND COST (rounded) ^h						891

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 92 existing plants, operating additional sources over the three-year period of this ICR. However, we assume that two existing plants will undergo modifications that require re-submittal or notifications and retesting.

^b This cost is based on the following hourly labor rates, increased by 60% to account for the benefit packages available to government employees: Managerial (GS-13, Step 5, \$42.73+60%), \$50.72 for Technical (GS-12, Step 1, \$31.70 + 60%) and \$27.46 Clerical (GS-6, Step 1, \$16.50 + 60%) from the Office of Personnel Management (OPM) “2020 General Schedule” which excludes locality rates of pay.

^c We have assumed that the number of existing plants that undergo construction or reconstruction will be two.

^d We have assumed that it will take each 0.5 hours to review each notification of actual startup.

^e We have assumed that it will take 0.5 hours to review each notification of performance test.

^f We have assumed that it will take 8 hours to review each performance test report.

^g We have assumed that it will take 4 hours two times per year to review semiannual reports.

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

50, Subpart F) (Renewal)

27.46

(G)	(H)
Clerical person-hours per year (G=Ex0.1)	Cost, \$^b
0.4	\$227.54
0.1	\$56.88
0.4	\$227.54
0.4	\$227.54
0.15	\$85.33
2.4	\$1,365.23
73.6	\$41,866.99
	\$44,100

125 kilns. There will be no
on or reconstruction which will

rnment employees: \$68.37 for
p 3, \$17.16 + 60%). These rates are

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

(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F)
CEMS	\$19,507	2	\$39,014	\$7,490	92	\$689,080
Flow Meter	\$8,090	2	\$16,180	\$0	0	\$0
Total			\$55,200			\$689,000