U.S. Environmental Protection Agency Information Collection Request

Title: NESHAP for Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2022 Proposed Rule)

OMB Control Number: 2060-0544

EPA ICR Number: 2072.10

Abstract: The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Lime Manufacturing Plants (40 CR Part 63, Subpart AAAAA) were proposed on December 20, 2002; promulgated on January 5, 2004; and amended on April 20, 2006. These regulations apply to existing facilities and new facilities that either emit or has the potential to emit any single hazardous air pollutant (HAP) at a rate of 9.07 megagrams (10 tons) or more per year or any combination of HAP at a rate of 22.68 megagrams (25 tons) or more per year from all emission sources at the plant site. This subpart covers lime kilns, their associated coolers, and processed stone handling (PSH) operation systems located at a lime manufacturing plant that is a major source. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. Final amendments to the NESHAP for Lime Manufacturing were promulgated on July 24, 2020, based on the results of a residual risk and technology review of the regulation (85 FR 44960). The information collection herein represents proposed rulemaking to add emission standards for four previously unregulated pollutants.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP. Any owner/operator subject to the provisions of the NESHAP for Lime Manufacturing shall maintain a file containing these documents and retain the file for at least five years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency's (EPA) regional offices.

As part of a recent inventory of facilities subject to the NESHAP for Lime Manufacturing Plants, including consultations with industry representatives, a search of the National Emission Inventory (NEI) and EPA's Enforcement and Compliance History Online (ECHO) database (www.echo.epa.gov), and consultations with the National Lime Association, we estimate that there are currently 35 lime manufacturing facilities operating in the U.S. subject to the requirements of the Lime Manufacturing NESHAP.

The "Affected Public" are owners or operators of lime manufacturing facilities. Based on a recent review of active air emissions permits and information from the Lime Manufacturers Association, we estimate that there are currently 35 lime manufacturing facilities, which are owned and operated by the lime manufacturing industry (aka: the "Affected Public"). None of the facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA requirements. The "burden"

to the Affected Public may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Lime Manufacturing (40 CFR Part 63, Subpart AAAAA) (2022 Proposed Rule). The "burden" to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2022 Proposed Rule).

Over the next three years, approximately 35 existing respondents per year will be subject to these standards, and we do not anticipate, due to the current economy of the nation, that any new respondents would be added over the next three years.

Supporting Statement A

1. NEED AND AUTHORITY FOR THE COLLECTION

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, hazardous air pollutant emissions from lime manufacturing facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart AAAAA.

2. PRACTICAL UTILITY/USERS OF THE DATA

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with these emission standards. Performance testing is required every five years.

The notifications required in these standards are used to inform either the Agency or its delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and that these standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

3. USE OF TECHNOLOGY

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

4. EFFORTS TO IDENTIFY DUPLICATION

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

5. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The majority of the respondents are large entities (i.e., large businesses); however, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. As part of a recent inventory of facilities subject to the NESHAP for Lime Manufacturing Plants, including information collected through a recent CAA Section 114 data collection effort, there are approximately 12 companies operating 35 affected facilities. Of these, three companies operating four facilities were identified as small businesses. As such, small businesses currently account for 11% (4 out of the 35) of regulated facilities. For this 3-year ICR period, it is estimated that there will be an average of 35 lime manufacturing plants. EPA estimates that 4 of these 35 plants are owned by small entities.

Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

6. CONSEQUENCES OF LESS FREQUENT COLLECTION

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied, and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

7. GENERAL GUIDELINES

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

Otherwise, the proposed collection does not create special circumstances requiring justification under 5 CFR 1320.5.

8. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

EPA is soliciting comments on this ICR through the notice and comment period announced through the Notice of Proposed Rulemaking. All comments will be considered during the development of the final rule.

8b. Consultations

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based a data collection survey sent to industry according to EPA's authority under Section 114 of the Clean Air Act (CAA) in January of 2017 and taking into account current economic conditions based on COVID-19. Based on this review, approximately 35 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted the National Lime Association.

9. PAYMENTS OR GIFTS TO RESPONDENTS

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

The Agency does not intend to provide payments or gifts to respondents as part of this collection.

10. ASSURANCE OF CONFIDENTIALITY

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

11. JUSTIFICATION FOR SENSITIVE QUESTIONS

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

12. RESPONDENT BURDEN HOURS & LABOR COSTS

Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.

12a. Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements are lime manufacturing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3274 which corresponds to the North American Industry Classification System (NAICS) 327410 for Lime Manufacturing.

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

12b. Information Requested

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

A source must make the following reports:

Notifications						
Applicability	§63.9(b), §63.7130(a)					
Anticipated startup	§63.9(b)(4), §63.7130(a)					
Construction/Reconstruction	§63.9(b)(4), §63.7130(a)					
Initial notification of startup	§63.9(b)(4), §63.7130(a), §63.7130(c)					
Intention to construct/reconstruct	§§63.9(b)(4)-(5), §63.7130(a)					
Compliance dates/extension	§63.9(c), §63.7130(a)					
Notification of intent to conduct performance test/opacity observations	§63.7(b)(1), §63.9(e), §63.9(f), §63.7130(a), §63.7130(d)					
Notification of Compliance Status for initial compliance demonstration	§63.7130(a), §63.7130(e), §63.9(h), §63.10(d)(2)					

Reports	
Operation, maintenance, and monitoring plan	§63.7100(d)
Startup, shutdown, and malfunction plan	§63.6(e)(3), §63.10(d)(5), §63.7100(e)
Semiannual compliance report (no deviations, emission limit deviations, CMS out-of-control, SSM)	§63.8(c)(7), §63.10(d)(2), §§63.7131(a)- (f)
Emergency SSM reports, including where procedures were not followed	§63.6(e)(3), §63.10(d)(5), §63.7131(a), §63.7131(b)

A source must keep the following records:

Recordkeeping							
Notifications and reports	§63.10(b)(2)(xiv), §63.7132(a)(1)						
Startup, shutdown, and malfunction plan/events	§§63.6(e)(3)(iii)-(v), §63.7132(a)(2)						
Performance tests and opacity observations	§63.10(b)(2)(viii), §63.7132(a)(3)						
Visual emissions observations	§63.6(h)(6), §63.7132(b)						
Records required to demonstrate continuous compliance with emission limitations	§63.10(b)(2)(vii), §63.7132(c)						
Basis for the initial applicability determination	§63.7132(d)						
Records are required to be retained for five years	§63.10(b)(1)						

12c. Respondent Activities

Respondent Activities

Familiarization with the regulatory requirements.

Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.

Perform initial performance test, Reference Methods 1 or 1A, 2, 2A, 2C, 2D, 2F or 2G, 3, 3A, or 3B, 4, 5, 5D, 9, 17, 18, 22, 23, 25A, 29, 30B, 320, 321, ASTM D6420-99, or ASTM Method D6735-01 test, and repeat performance tests if necessary.

Write the notifications and reports listed above.

Enter information required to be recorded above.

Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.

Develop, acquire, install, and utilize technology and systems for processing and maintaining information.

Develop, acquire, install, and utilize technology and systems for disclosing and providing information.

Respondent Activities

Train personnel to be able to respond to a collection of information.

Transmit, or otherwise disclose the information.

12d. Respondent Burden Hours and Labor Costs

Based on our research for this ICR, on average over the next three years, approximately 35 existing respondents will be subject to these standards. It is estimated that no additional respondent will become subject over time. The overall average number of respondents, as shown in the table below, remains 35 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

	Number of Respondents										
	Respondents That St	ubmit Reports	Respondents That Do Not Submit Any Reports								
Year	(A) Number of New Respondents ^a	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)						
1	0	35	0	0	35						
2	0	35	0	0	35						
3	0	35	0	0	35						
Average	0	35	0	0	35						

^a New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 35.

The total number of annual responses per year is calculated using the following table:

Total Annual Responses									
(A)	(B)	(C)	(D)	(E)					
Information Collection Activity	Number of Respondent s	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit	Total Annual Responses E=(BxC)+D					

Total Annual Responses								
			Reports					
Notification of applicability	35	1	0	1				
Notification of construction/ reconstruction	35	1	0	1				
Notification of anticipated startup	35	1	0	1				
Notification of actual startup	35	1	0	1				
Notification of special compliance requirements	N/A	N/A	N/A	N/A				
Compliance extension request	N/A	1	0	1				
Notification of performance tests	35	1	0	23.6				
Notification of opacity/VE observations	N/A	1	0	37				
Operation, maintenance, and monitoring plans	35	1	0	1				
Startup, shutdown, and malfunction plans	N/A	1	0	1				
Site-specific test plan	35	1	0	1				
Notification of compliance status	35	1	0	1				
Waiver application	N/A	N/A	N/A	N/A				
Semiannual compliance reports	35	2	0	74				
Emergency startup, shutdown, or malfunction reports	35	1	0	1.9				
			Total	145				

The number of Total Annual Responses is 145.

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 8,392 hours (Total Labor Hours from Tables 1-4 below). These hours are based on Agency studies and background documents from the development of the regulation,

Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

This ICR uses the following labor rates:

Managerial \$117.73 (\$56.06+ 110%)

Technical \$106.56 (\$50.74 + 110%)

Clerical \$43.47 (\$20.70 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2021 National Industry-Specific Occupational Employment and Wage Estimates for NAICS 327000 – Nonmetallic Mineral Product Manufacturing. The rates represent the median hourly rate for labor codes 11-1021, 11-3051, and 43-6010, representing the categories "Managerial", "Technical", and "Clerical", respectively. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

We assume that burdens for managerial tasks take 5 percent of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10 percent of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

The total annual labor costs are \$2,550,000 and are averaged to be approximately \$850,000 per year for the first three years. Details regarding these estimates may be found at the end of this document in Table 1.

13. RESPONDENT CAPITAL AND O&M COSTS

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities. If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The type of industry costs associated with the information collection activities in the subject standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. Each respondent subject to the Lime Manufacturing NESHAP must conduct initial performance testing in accordance with the proposed emission standards. The annual operation and maintenance costs are the ongoing costs associated with the various air pollution control devices (APCD) required to comply with the NESHAP.

The total capital/startup costs and total operation and maintenance (O&M) costs for this ICR combined are estimated to be \$1,005,000. The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$335,000 per year. See Tables 1-4 below for details.

14. AGENCY COSTS

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

Agency Activities

Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.

Audit facility records.

Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standards. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

14b. Agency Labor Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes such activities as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

EPA Wages							
	Wage With Fringe &						
Category (1)	Hourly Mean Wage (2)	Overhead (3)					
(GS- 12, step 1) - Technical	\$32.02	\$51.24					
(GS- 13, step 5) - Managerial	\$43.15	\$69.04					
(GS-6, step 3) - Clerical	\$17.33	\$27.73					

Footnotes:

(1) The hourly mean wage for each category is based on 2021 wages, and are found here:

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/ 21Tables/html/GS h.aspx

(2) Wage with fringe and overhead is the hourly mean wage increased by 60 percent to account for the benefit packages available to government employees.

We assume that burdens for managerial tasks take 5 percent of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10 percent of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

The total average annual burden for the Agency is 1,194 hours resulting in \$59,700 labor costs. See Tables 5-8 below for details.

14c. Agency Non-Labor Costs

There are no anticipated non-labor costs for the Agency.

15) REASONS FOR CHANGE IN BURDEN

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

This assessment differs from the current OMB Inventory of Approved Burdens. This assessment represents the burden associated with the 2022 proposed rule amendments to the Lime Manufacturing Plant NESHAP.

16) PUBLICATION OF DATA

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

17) DISPLAY OF EXPIRATION DATE

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18) CERTIFICATION STATEMENT

Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.

Table 1 : Annual Respondent Burden and Cost Year One – Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2022 Proposed Rule)

Burden item	(A) Person hours per occurre nce	(B) No. of occurren ces per responde nt per year	(C) Person hours per respond ent per year (C=AxB	(D) Responde nts per year ^a	(E) Techni cal person- hours per year (E=Cx D)	(F) Managem ent person hours per year (F=Ex0.0 5)	(G) Clerical person hours per year (G=Ex0 .1)	(H) Total Cost Per Year (\$)
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, And Utilization of Technology and Systems $^{\rm c}$	N/A							
4. Reporting Requirements								
a. Familiarization with Regulatory Requirements	2	1	2	35	70	4	7	\$8,175.5 5
b. Required Activities								
Initial performance tests for existing kilns d, e	40	1	40	35	1,400	70	140	\$163,510 .90
Visible emission (VE) report for material handling	N/A							
Annual inspection of capture, collection, and transport system ^h	N/A							
Inspection and maintenance of affected sources, control devices, and monitoring systems according to operation, maintenance, and monitoring plan ⁱ	4	1	4	35	140	7	14	\$16,351. 09
c. Create Information	See 4B							
d. Gather Existing Information	See 4B							
e. Write Report								
Notification of Applicability ^c	N/A							
Notification of Construction/Reconstruction ^c	N/A							
Notification of Anticipated Startup ^c	N/A							

Notification of Actual Startup ^c	N/A							
Notification of Special Compliance Requirements	N/A							
Compliance Extension Request ^c	N/A							
Notification of Initial and Repeat Performance Tests ^{d, e}	2	1	2	35	70	4	7	\$8,175.5 5
Notification of Opacity/VE Observations	N/A							
Operation, Maintenance, and Monitoring Plan ^c	N/A							
Startup, Shutdown, and Malfunction Plan ^c	N/A							
Site-Specific Test Plan ^c	N/A							
Notification of Compliance Status ^c	N/A							
Waiver Application	N/A							
Semiannual Compliance Reports ^j	8	2	16	35	560	28	56	\$65,404. 36
Emergency Startup, Shutdown, and Malfunction Reports ^{k,l}	8	1	8	35	280	14.0	28	\$32,702. 18
Subtotal for Reporting Requirements						2,898		\$294,320
5. Recordkeeping Requirements								
a. Familiarization with Regulatory Requirements	See 4A							
b. Plan Activities	3	1	3	35	105	5.3	10.5	\$12,263. 32
c. Implement Activities ^m	12	1	12	35	420	21.0	42.0	\$49,053. 27
d. Develop Record System	3	1	3	35	105	5.3	10.5	\$12,263. 32
e. Time to Enter Information								
Record of All Information Required by Standards ⁿ	3	52	156	35	5,460	273	546	\$637,692 .51
f. Train Personnel °	3	1	3	35	105	5.3	10.5	\$12,263. 32
g. Time to Adjust Existing Ways to Comply with Previously Applicable Requirements ^p	3	1	3	35	105	5.3	10.5	\$12,263. 32
h. Time to Transmit or Disclose Information ^q	0.25	2	0.5	35	18	0.9	1.8	\$2,043.8 9
g. Time for Audits	N/A							
Subtotal for Recordkeeping Requirements						<i>7</i> ,265		\$737,843

Total Labor Burden and Costs (rounded) ^r			10,160	\$1,030,0 00
Capital and O&M Cost (rounded) ^r				\$335,000
Grand Total (rounded) ^r				\$1,370,0
Grand Total (rounded)				00

- a. Assumed that the average number of respondents that will be subject to the rule will be 35 existing respondents. There will be no new sources per year that will become subject to the rule.
- b. This ICR uses the United States Department of Labor, Bureau of Labor Statistics, May 2021 National Industry-Specific Occupational Employment and Wages Estimates for NAICS 327000 *Nonmetallic Mineral Product Manufacturing*. The mean hourly rate (column 8 of the table) for occupational codes 11-1021 *General and Operational Managers*, 11-3051 *Industrial Production Managers*, and 43-6010 *Secretaries and Administrative Assistants* were used for Managerial (\$56.06), Technical (\$50.74), and clerical (\$20.70) respectively. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- c. No new facilities are expected to be built in this time period..
- d. All respondants are required to perform initial performance testing in the first year.
- e. Respondents must conduct repeat performance tests on existing kilns every 5 years to demonstrate continuous compliance.
- f. Assumed that each respondent will take 4 hours to complete the inspection and maintenance of affected sources, control devices, and monitoring systems according to operation, maintenance, and monitoring plan.
- g. Assumed that it will take 8 hours each and two times per year to complete semiannual compliance reports.
- h. Assumed that it will take 8 hours once a year to write the emergency startup, shutdown, or malfunction reports.
- i. Assumed that it will take 12 hours to record activities implemented.
- j. Assumed that all respondents will take 3 hours each to enter records of all the required information 52 times a year.
- k. Assumed that it will take 3 hours to train each personnel.
- 1. Assumed that it will take 3 hours for each respondent to adjust existing ways to comply with previously applicable requirements.
- $m. \ \ Assumed that \ respondents \ are \ required \ to \ transmit/disclose \ information \ twice \ per \ year.$
- n. Totals are rounded to three significant figures. Figures may not add up exactly due to rounding.

Table 2 : Annual Respondent Burden and Cost Year Two – Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2022 Proposed Rule)

Burden item	(A) Person hours per occurre nce	(B) No. of occurren ces per responde nt per year	(C) Person hours per respond ent per year (C=AxB	(D) Responde nts per year ^a	(E) Techni cal person- hours per year (E=Cx D)	(F) Managem ent person hours per year (F=Ex0.0 5)	(G) Clerical person hours per year (G=Ex0 .1)	(H) Total Cost Per Year (\$)
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, And Utilization of Technology and Systems ^c	N/A							
4. Reporting Requirements								
a. Familiarization with Regulatory Requirements	2	1	2	35	70	4	7	\$8,175.5 5
b. Required Activities								
Initial performance tests for existing kilns d, e	N/A							
Visible emission (VE) report for material handling	N/A							
Annual inspection of capture, collection, and transport system ^h	N/A							
Inspection and maintenance of affected sources, control devices, and monitoring systems according to operation, maintenance, and monitoring plan ⁱ	4	1	4	35	140	7	14	\$16,351. 09
c. Create Information	See 4B							
d. Gather Existing Information	See 4B							
e. Write Report								
Notification of Applicability ^c	N/A							
Notification of Construction/Reconstruction ^c	N/A							
Notification of Anticipated Startup ^c	N/A							
Notification of Actual Startup ^c	N/A							

Notification of Special Compliance Requirements	N/A							
Compliance Extension Request ^c	N/A							
Notification of Initial and Repeat Performance Tests ^{d, e}	2	1	2	0	0	0	0	\$0.00
Notification of Opacity/VE Observations	N/A							
Operation, Maintenance, and Monitoring Plan ^c	N/A							
Startup, Shutdown, and Malfunction Plan ^c	N/A							
Site-Specific Test Plan ^c	N/A							
Notification of Compliance Status ^c	N/A							
Waiver Application	N/A							
Semiannual Compliance Reports ^j	8	2	16	35	560	28	56	\$65,404. 36
Emergency Startup, Shutdown, and Malfunction Reports k,1	8	1	8	35	280	14.0	28	\$32,702. 18
Subtotal for Reporting Requirements						1,208	•	\$122,633
5. Recordkeeping Requirements								
a. Familiarization with Regulatory Requirements	See 4A							
b. Plan Activities	N/A							
c. Implement Activities ^m	N/A							
d. Develop Record System	N/A							
e. Time to Enter Information								
Record of All Information Required by Standards ⁿ	3	52	156	35	5,460	273	546	\$637,692 .51
f. Train Personnel °	N/A							
g. Time to Adjust Existing Ways to Comply with Previously Applicable Requirements ^p	N/A							
h. Time to Transmit or Disclose Information ^q	0.25	2	0.5	35	18	0.9	1.8	\$2,043.8 9
g. Time for Audits	N/A							
Subtotal for Recordkeeping Requirements						6,299		\$639,736
Total Labor Burden and Costs (rounded) ^r					7,510			\$760,000
Capital and O&M Cost (rounded) ^r								\$335,000
Grand Total (rounded) ^r								\$1,100,0

				1
				1 00
				1 1111
				1 00

- a. Assumed that the average number of respondents that will be subject to the rule will be 35 existing respondents. There will be no new sources per year that will become subject to the rule.
- b. This ICR uses the United States Department of Labor, Bureau of Labor Statistics, May 2021 National Industry-Specific Occupational Employment and Wages Estiates for NAICS 327000 *Nonmetallic Mineral Product Manufacturing*. The mean hourly rate (column 8 of the table) for occupational codes 11-1021 *General and Operational Managers*, 11-3051 *Industrial Production Managers*, and 43-6010 *Secretaries and Administrative Assistants* were used for Managerial (\$56.06), Technical (\$50.74), and clerical (\$20.70) respectively. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- c. No new facilities are expected to be built in this time period..
- d. All respondants are required to perform initial performance testing in the first year.
- e. Respondents must conduct repeat performance tests on existing kilns every 5 years to demonstrate continuous compliance.
- f. Assumed that each respondent will take 4 hours to complete the inspection and maintenance of affected sources, control devices, and monitoring systems according to operation, maintenance, and monitoring plan.
- g. Assumed that it will take 8 hours each and two times per year to complete semiannual compliance reports.
- h. Assumed that it will take 8 hours once a year to write the emergency startup, shutdown, or malfunction reports.
- i. Assumed that this action was accomplished in year 1, and not required in years 2 and 3.
- j. Assumed that all respondents will take 3 hours each to enter records of all the required information 52 times a year.
- k. Assumed that this action was accomplished in year 1 and not required in years 2 and 3.
- l. Assumed that this action was accomplished in year 1 and not required in years 2 and 3.
- m. Assumed that respondents are required to transmit/disclose information twice per year.
- n. Totals are rounded to three significant figures. Figures may not add up exactly due to rounding.

Table 3 : Annual Respondent Burden and Cost Year Three – Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2022 Proposed Rule)

Burden item	(A) Person hours per occurre nce	(B) No. of occurren ces per responde nt per year	(C) Person hours per respond ent per year (C=AxB	(D) Responde nts per year ^a	(E) Techni cal person - hours per year (E=Cx D)	(F) Managem ent person hours per year (F=Ex0.0 5)	(G) Clerical person hours per year (G=Ex0 .1)	(H) Total Cost Per Year (\$)
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, And Utilization of Technology and Systems ^c	N/A							
4. Reporting Requirements								
a. Familiarization with Regulatory Requirements	2	1	2	35	70	4	7	\$8,175.5 5
b. Required Activities								
Initial performance tests for existing kilns d, e	N/A							
Visible emission (VE) report for material handling ^g	N/A							
Annual inspection of capture, collection, and transport system ^h	N/A							
Inspection and maintenance of affected sources, control devices, and monitoring systems according to operation, maintenance, and monitoring plan ⁱ	4	1	4	35	140	7	14	\$16,351. 09
c. Create Information	See 4B							
d. Gather Existing Information	See 4B							
e. Write Report								
Notification of Applicability ^c	N/A							
Notification of Construction/Reconstruction ^c	N/A							
Notification of Anticipated Startup ^c	N/A							
Notification of Actual Startup ^c	N/A							

Notification of Special Compliance Requirements	N/A							
Compliance Extension Request ^c	N/A							
Notification of Initial and Repeat Performance Tests ^{d, e}	2	1	2	0	0	0	0	\$0.00
Notification of Opacity/VE Observations	N/A							
Operation, Maintenance, and Monitoring Plan ^c	N/A							
Startup, Shutdown, and Malfunction Plan ^c	N/A							
Site-Specific Test Plan ^c	N/A							
Notification of Compliance Status ^c	N/A							
Waiver Application	N/A							
Semiannual Compliance Reports ^j	8	2	16	35	560	28	56	\$65,404. 36
Emergency Startup, Shutdown, and Malfunction Reports k,1	8	1	8	35	280	14.0	28	\$32,702. 18
Subtotal for Reporting Requirements						1,208	•	\$122,633
5. Recordkeeping Requirements								
a. Familiarization with Regulatory Requirements	See 4A							
b. Plan Activities	N/A							
c. Implement Activities ^m	N/A							
d. Develop Record System	N/A							
e. Time to Enter Information								
Record of All Information Required by Standards ⁿ	3	52	156	35	5,460	273	546	\$637,692 .51
f. Train Personnel °	N/A							
g. Time to Adjust Existing Ways to Comply with Previously Applicable Requirements ^p	N/A							
h. Time to Transmit or Disclose Information ^q	0.25	2	0.5	35	18	0.9	1.8	\$2,043.8 9
g. Time for Audits	N/A							
Subtotal for Recordkeeping Requirements						6,299		\$639,736
Total Labor Burden and Costs (rounded) ^r					7,510			\$760,000
Capital and O&M Cost (rounded) ^r								\$335,000
Grand Total (rounded) ^r								\$1,100,0

1				
1				□ 00
\mathbf{I}				
\mathbf{I}				,

- a. Assumed that the average number of respondents that will be subject to the rule will be 35 existing respondents. There will be no new sources per year that will become subject to the rule.
- b. This ICR uses the United States Department of Labor, Bureau of Labor Statistics, May 2021 National Industry-Specific Occupational Employment and Wages Estiates for NAICS 327000 *Nonmetallic Mineral Product Manufacturing*. The mean hourly rate (column 8 of the table) for occupational codes 11-1021 *General and Operational Managers*, 11-3051 *Industrial Production Managers*, and 43-6010 *Secretaries and Administrative Assistants* were used for Managerial (\$56.06), Technical (\$50.74), and clerical (\$20.70) respectively. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- c. No new facilities are expected to be built in this time period..
- d. All respondants are required to perform initial performance testing in the first year.
- e. Respondents must conduct repeat performance tests on existing kilns every 5 years to demonstrate continuous compliance.
- f. Assumed that each respondent will take 4 hours to complete the inspection and maintenance of affected sources, control devices, and monitoring systems according to operation, maintenance, and monitoring plan.
- g. Assumed that it will take 8 hours each and two times per year to complete semiannual compliance reports.
- h. Assumed that it will take 8 hours once a year to write the emergency startup, shutdown, or malfunction reports.
- i. Assumed that this action was accomplished in year 1, and not required in years 2 and 3.
- j. Assumed that all respondents will take 3 hours each to enter records of all the required information 52 times a year.
- k. Assumed that this action was accomplished in year 1 and not required in years 2 and 3.
- l. Assumed that this action was accomplished in year 1 and not required in years 2 and 3.
- m. Assumed that respondents are required to transmit/disclose information twice per year.
- n. Totals are rounded to three significant figures. Figures may not add up exactly due to rounding.

Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2022 Proposed Rule)

Year	Technical Hours	Management Hours	Clerical Hours	Total Labor Hours	Labor Costs	Non-Labor (Capital/Startup and O&M) Costs	Total Costs
					\$1,030,000		
1	8,838	442	884	10,163		\$335,000	\$1,370,000
2	6,528	326	653	7,507	\$760,000	\$335,000	\$1,100,000
3	6,528	326	653	7,507	\$760,000	\$335,000	\$1,100,000
Total	21,893	1,095	2,189	25,176	\$2,550,000	\$1,005,000	\$3,570,000
Average	7,298	365	730	8,392	\$850,000	\$335,000	\$1,190,000

Table 5: Average Annual EPA Burden and Cost Year One – Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2022 Proposed Rule)

Activity	(A) EPA person hours per occurre nce	(B) No. of occurren ces per plant per year	(C) EPA person hours per respond ent per year (C=AxB	(D) Plants per year ^a	(E) Techni cal person - hours per year (E=Cx D)	(F) Manage ment person hours per year (F=Ex0.0 5)	(G) Clerica l person hours per year (G=Ex0 .1)	(H) Total Cost Per Year (\$) ^b
Initial Performance Tests ^c	40	1	40	35	1400	70	140	\$80,451 .00
Retesting Preparation for Repeat Performance Tests ^d	N/A							
Repeat Performance Tests ^d	N/A							
Report Review								
Notification of Applicability	N/A							
Notification of Construction/Reconstruction	N/A							
Notification of Anticipated Startup	N/A							
Notification of Actual Startup	N/A							
Notification of Special Compliance Requirements	N/A							
Notification of Initial Performance Tests	1	1	1	35	35	1.75	3.5	\$2,011. 28
Notification of Compliance Status	4	1	4	35	140	7	14	\$8,045. 10
Review of Repeat Performance Test Report ^e	N/A							
Review of Semiannual Compliance Report	4	2	8	35	280	14	28	\$16,090 .20
Review of Waiver Application	N/A							
Review of Emergency Startup, Shutdown, and Malfunction Report ^f	4	1	4	35.0	140	7	14	\$8,045. 10
Total (rounded) ^g						2,290		\$114,60

- a. Assumed that the average number of respondents that will be subject to the rule will be 35 existing respondents. There will be no new sources per year that will become subject to the rule over the three-year period of this ICR.
- b. This ICR uses the following labor rates: \$43.15for managerial, \$32.02 for technical, and \$17.33 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2020 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
- c. No new sources per year for this action.
- d. To demonstrate continuous compliance, plants must conduct repeat performance tests every 5 years. Assumed that it will take 40 hours for respondents to repeat performance tests.
- e. Assumed that it will take 2 hours for respondents to review repeat performance test report.
- f. Totals have been rounded to three significant figures. Figures may not add together exactly due to rounding.

Table 6: Average Annual EPA Burden and Cost Year Two – Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2022 Proposed Rule)

Activity	(A) EPA person hours per occurre nce	(B) No. of occurren ces per plant per year	(C) EPA person hours per respond ent per year (C=AxB	(D) Plants per year ^a	(E) Techni cal person - hours per year (E=Cx D)	(F) Manage ment person hours per year (F=Ex0.0 5)	(G) Clerica I person hours per year (G=Ex0 .1)	(H) Total Cost Per Year (\$) ^b
Initial Performance Tests ^c	N/A							
Retesting Preparation for Repeat Performance Tests ^d	N/A							
Repeat Performance Tests ^d	N/A							
Report Review								
Notification of Applicability	N/A							
Notification of Construction/Reconstruction	N/A							
Notification of Anticipated Startup	N/A							
Notification of Actual Startup	N/A							
Notification of Special Compliance Requirements	N/A							
Notification of Initial Performance Tests	N/A							
Notification of Compliance Status	4	1	4	35	140	7	14	\$8,045. 10
Review of Repeat Performance Test Report ^e	N/A							
Review of Semiannual Compliance Report	4	2	8	35	280	14	28	\$16,090 .20
Review of Waiver Application	N/A							
Review of Emergency Startup, Shutdown, and Malfunction Report ^f	4	1	4	35.0	140	7	14	\$8,045. 10
Total (rounded) ^g						640		\$32,200

- a. Assumed that the average number of respondents that will be subject to the rule will be 35 existing respondents. There will be no new sources per year that will become subject to the rule over the three-year period of this ICR.
- b. This ICR uses the following labor rates: \$43.15for managerial, \$32.02 for technical, and \$17.33 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2020 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
- c. No new sources per year for this action.
- d. To demonstrate continuous compliance, plants must conduct repeat performance tests every 5 years. Assumed that it will take 40 hours for respondents to repeat performance tests.
- e. Assumed that it will take 2 hours for respondents to review repeat performance test report.
- f. Totals have been rounded to three significant figures. Figures may not add together exactly due to rounding.

Table 7: Average Annual EPA Burden and Cost Year Three – Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2022 Proposed Rule)

Activity	(A) EPA person hours per occurre nce	(B) No. of occurren ces per plant per year	(C) EPA person hours per respond ent per year (C=AxB	(D) Plants per year ^a	(E) Techni cal person - hours per year (E=Cx D)	(F) Manage ment person hours per year (F=Ex0.0 5)	(G) Clerica I person hours per year (G=Ex 0.1)	(H) Total Cost Per Year (\$) ^b
Initial Performance Tests ^c	N/A							
Retesting Preparation for Repeat Performance Tests ^d	N/A							
Repeat Performance Tests ^d	N/A							
Report Review								
Notification of Applicability	N/A							
Notification of Construction/Reconstruction	N/A							
Notification of Anticipated Startup	N/A							
Notification of Actual Startup	N/A							
Notification of Special Compliance Requirements	N/A							
Notification of Initial Performance Tests	N/A							
Notification of Compliance Status	4	1	4	35	140	7	14	\$8,045. 10
Review of Repeat Performance Test Report ^e	N/A							
Review of Semiannual Compliance Report	4	2	8	35	280	14	28	\$16,090 .20
Review of Waiver Application	N/A							
Review of Emergency Startup, Shutdown, and Malfunction Report ^f	4	1	4	35.0	140	7	14	\$8,045. 10
Total (rounded) ^g						640		\$32,200

- a. Assumed that the average number of respondents that will be subject to the rule will be 35 existing respondents. There will be no new sources per year that will become subject to the rule over the three-year period of this ICR.
- b. This ICR uses the following labor rates: \$43.15for managerial, \$32.02 for technical, and \$17.33 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2020 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
- c. No new sources per year for this action.
- d. To demonstrate continuous compliance, plants must conduct repeat performance tests every 5 years. Assumed that it will take 40 hours for respondents to repeat performance tests.
- e. Assumed that it will take 2 hours for respondents to review repeat performance test report.
- f. Totals have been rounded to three significant figures. Figures may not add together exactly due to rounding.

Table 8 - Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2022 Proposed Rule)

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non- Labor Costs	Total Costs
1	1,995	100	200	2,294	\$114,600	\$0	\$114,600
2	560	28	56	644	\$32,200	\$0	\$32,200
3	560	28	56	644	\$32,200	\$0	\$32,200
Total	3,115	156	312	3,582	\$179,000	\$0	\$179,000
Averag							
e	1,038	52	104	1,194	\$59,700	\$0	\$59,700