

# U.S. Environmental Protection Agency

## Information Collection Request

**Title:** NESHAP for Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2024 Final Rule)

**OMB Control Number:** 2060-0544

**EPA ICR Number:** 2072.11

**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 most recently amended on July 16, 2024. These regulations apply to existing facilities and new facilities that either emit or have the potential to emit any single hazardous air pollutant (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 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 16, 2024, based on the results of a technology review of the regulation (89 FR 57738). These amendments finalized maximum achievable control technology (MACT) standards for hydrogen chloride (HCl), mercury, organic HAP, and dioxin/furans (D/F). The information collection herein accounts for the burden associated with the incorporation of reporting and recordkeeping requirements associated with the July 16, 2024 amendments.

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 this part shall maintain a file of these measurements and retain the file for at least 5 years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. In the event that there is no such delegated authority, the EPA regional office can review them. All other reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the EPA regional offices.

The Office of Management and Budget (OMB) approved the currently-active ICR with the following "Terms of Clearance":

"In accordance with 5 CFR 1320, the information collection is approved for three years. As terms of clearance, upon renewal of this collection, EPA is required to include the following in its supporting statement for this and other NESHAP ICRs: (1) a description of the regulatory text applicable to the

ICR including submission specifications; (2) a clear description of the data elements being collected under the ICR; (3) screen shots of the electronic portal where the reporting requirements are submitted to EPA (with the control number and burden statement); (4) a detailed discussion of how information is submitted and the extent to which electronic reporting is available; (5) evidence of consultation with respondents (by actively reaching out to stakeholders as permitted by the PRA) to ensure the supporting statement's accuracy on availability of data, frequency of collection, clarity of instructions, accuracy of burden estimate, relevance of data elements, and similar PRA matters; and (6) discussion of how EPA addressed substantive concerns raised by respondents and other stakeholders during consultation and in response to comments received on FR notices. In addition, please convert the supporting statement to the standard 18 question SS-A format upon renewal.”

The relevant regulatory text is referenced in section 12(b) of this document. We have created a supplementary document including the regulatory text that describes the ICR requirements as identified in section 12(b) of this document as requested. All electronic collection in this information collection is submitted through EPA's CEDRI, as discussed in section 12(b) of this document. Additional Paperwork Reduction Act requirements for CEDRI, including the burden statement and OMB control number, are available at: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>. We have created supplementary documents that include screenshots of the electronic portal where the reporting requirements are submitted online to EPA, including the OMB burden statement on the electronic portal. A description of the EPA's consultation with respondents and how EPA responded to any concerns raised by respondents or other stakeholders is discussed in section 8 of this document. Per the Terms of Clearance on the previous ICR, this supporting statement follows the standard 18-question format.

## **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, HAP emissions from lime manufacturing sources cause or contribute to air pollution that may reasonably be anticipated to endanger public health 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.

Respondents are required to use the EPA's Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. Respondents are also required to submit electronic copies of certain notifications through EPA's CEDRI. The notification is an upload of their currently required notification in portable document format (PDF) file. The semiannual compliance reports are to be created using Form 5900-604,

the electronic template included with this Supporting Statement. The template is an Excel spreadsheet which can be partially completed and saved for subsequent annual and semiannual reports to limit some of the repetitive data entry. It reflects the reporting elements required by the rule and does not impose additional reporting elements. The OMB Control Number is displayed on the Welcome page of the template, with a link to an online repository that contains the PRA requirements. For purposes of this ICR, it is assumed that there is no additional burden associated with the requirement for respondents to submit the notifications and reports electronically. The supplemental files to this ICR renewal contain screenshots showing the CDX homepage for CEDRI login, the CEDRI PRA screen, the CEDRI interface for managing reports for various subparts, and the landing page of the ERT that shows the link to PRA information.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

#### **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.*

---

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, 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 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 11 companies operating 34 affected facilities. Of these, three companies operating three facilities were identified as small businesses. As such, small businesses currently account for 9 percent (3 out of the 34) of regulated facilities. For this 3-year ICR period, it is estimated that there will be an average of 34 lime manufacturing plants. EPA estimates that 3 of these 34 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 the 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 reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

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

## **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.*

A public notice and solicitation of public comment on this collection was provided in the Federal Register notice of the proposed rulemaking (88 FR 805) on January 5, 2023 and in the supplemental notice of proposed rulemaking (89 FR 9088) on February 9, 2024. In the supplemental proposed rulemaking, the EPA proposed revisions to the previously proposed emission limits for HCl, mercury, organic HAP, and

D/F based on additional information gathered since the publication of the January 5, 2023 proposed rule amendments. No comments were received on the burden published in the Federal Register for this ICR.

### **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 the standard, 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 on our consultations with the Agency's internal industry experts. Approximately 34 respondents will be subject to the standard over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed as described in Section 8.a above, and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. Additionally, the EPA conducted outreach and solicited comments from small entity representatives (SERs). The EPA did not receive comments on this information collection.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

### **9. PAYMENTS OR GIFTS TO RESPONDENTS**

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

---

No payments or gifts are made to respondents.

### **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 (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 the standard 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:

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

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](http://www.echo.epa.gov)), and consultations with the National Lime Association, we estimate that there are currently 34 lime manufacturing facilities operating in the U.S. subject to the requirements of the Lime Manufacturing NESHAP. 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 inquiries.

Over the next three years, approximately 34 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. Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and each plant site has only

one respondent (i.e., the owner/operator of the plant site). The number of respondents is calculated using the table Number of Respondents that addresses the three years covered by this ICR.

The total number of annual responses per year is calculated using the table Total Annual Responses shown below. The number of Total Annual Responses is 238.

**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:

<b>Notifications</b>	
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)
Notification of changes in information (reclassification to area source status or to revert to major source status) (electronic submission)	§63.9(b), §63.9(j)



<b>Reports</b>	
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) (electronic submission)	§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)
Performance test reports (electronic submission)	§63.7131(h)

A source must keep the following records:

<b>Recordkeeping</b>	
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)

<b>Recordkeeping</b>	
Records are required to be retained for five years	§63.10(b)(1)

### 12c. Respondent Activities

<b>Respondent Activities</b>
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.
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

Tables 1 through 4 document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 8,392 hours (Average Total Labor Hours from Table 4). 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% 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% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

### **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.

#### **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**

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

- 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 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 is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. 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.

##### **14b. Agency Labor Cost**

The 'burden' to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors. The only costs to the Agency are those costs associated with analysis of the reported information. The 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. The average annual Agency burden and cost during the three years of the ICR is estimated to be 1,194 hours at a cost of \$59,700. See 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) (2024 Final Rule).

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

Managerial	\$69.04 (GS-13, Step 5, \$43.15 + 60%)
Technical	\$51.24 (GS-12, Step 1, \$32.02 + 60%)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 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. Details upon which this estimate is based appear at the end of this document in Tables 5 through 7 and summarized in 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) (2024 Final Rule).

#### **14c. Agency Non-Labor Costs**

There are no non-labor costs to the Agency associated with this information collection.

#### **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 2024 final 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.*

---

All non-CBI data submitted electronically to the Agency through CEDRI are available to the public for review and printing and are accessible using WebFIRE. Electronically submitted emissions data from performance testing or performance evaluations using the Electronic Reporting Tool or templates attached to CEDRI, as well as data from reports from regulations with electronic templates, are tabulated; data submitted as portable document format (PDF) files attached to CEDRI are neither tabulated nor subject to complex analytical techniques. Electronically submitted emissions data used to develop emissions factors undergo complex analytical techniques and the draft emissions factors are available on the Clearinghouse for Inventories and Emission Factors listserv at <https://www.epa.gov/chief/chief-listserv> for public review and printing. Electronically submitted emissions data, as well as other data, obtained from one-time or sporadic information collection requests often undergo complex analytical techniques; results of those activities are included in individual rulemaking dockets and are available at <https://www.regulations.gov/> for public review and printing.

**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.*

---

EPA will display the expiration date for OMB approval of the information collection.

**18) CERTIFICATION STATEMENT**

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

---

There are no exceptions to the topics of the certification statement.

**Table 1: Annual Respondent Burden and Cost Year One - Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2024 Final Rule)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, And Utilization of Technology and Systems <sup>c</sup>	N/A							
4. Reporting Requirements								
a. Familiarization with Regulatory Requirements	2	1	2	35	70	4	7	\$8,175.55
b. Required Activities								
Initial performance tests for existing kilns <sup>d,e</sup>	40	1	40	35	1,400	70	140	\$163,510.90
Visible emission (VE) report for material handling <sup>g</sup>	N/A							
Annual inspection of capture, collection, and transport system <sup>h</sup>	N/A							
Inspection and maintenance of affected sources, control devices, and monitoring systems according to operation, maintenance, and monitoring plan <sup>i</sup>	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 <sup>c</sup>	N/A							
Notification of Construction/Reconstruction <sup>c</sup>	N/A							

Notification of Anticipated Startup <sup>c</sup>	N/A							
Notification of Actual Startup <sup>c</sup>	N/A							
Notification of Special Compliance Requirements	N/A							
Compliance Extension Request <sup>c</sup>	N/A							
Notification of Initial and Repeat Performance Tests <sup>d,e</sup>	2	1	2	35	70	4	7	\$8,175.55
Notification of Opacity/VE Observations Operation, Maintenance, and Monitoring Plan <sup>c</sup>	N/A							
Startup, Shutdown, and Malfunction Plan <sup>c</sup>	N/A							
Site-Specific Test Plan <sup>c</sup>	N/A							
Notification of Compliance Status <sup>c</sup>	N/A							
Waiver Application	N/A							
Semiannual Compliance Reports <sup>j</sup>	8	2	16	35	560	28	56	\$65,404.36
Emergency Startup, Shutdown, and Malfunction Reports <sup>k,l</sup>	8	1	8	35	280	14.0	28	\$32,702.18
<b>Subtotal for Reporting Requirements</b>						<b>2,898</b>		<b>\$294,320</b>
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 <sup>m</sup>	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 <sup>n</sup>	3	52	156	35	5,460	273	546	\$637,692.51
f. Train Personnel <sup>o</sup>	3	1	3	35	105	5.3	10.5	\$12,263.32
g. Time to Adjust Existing Ways to Comply with Previously Applicable Requirements <sup>p</sup>	3	1	3	35	105	5.3	10.5	\$12,263.32
h. Time to Transmit or Disclose Information <sup>q</sup>	0.25	2	0.5	35	18	0.9	1.8	\$2,043.89
g. Time for Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>7,265</b>		<b>\$737,843</b>
<b>Total Labor Burden and Costs (rounded) <sup>r</sup></b>						<b>10,160</b>		<b>\$1,030,000</b>



<b>Capital and O&amp;M Cost (rounded) †</b>									<b>\$335,000</b>
<b>Grand Total (rounded) †</b>									<b>\$1,370,000</b>

**Assumptions:**

- 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 respondents 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.
- l. Assumed that it will take 3 hours for each respondent to adjust existing ways to comply with previously applicable requirements.
- m. Assumed that respondents are required to transmit/disclose information twice per year.
- n. Totals are rounded to three significant figures. Figures may not add up exactly due to rounding.

**Table 2: Annual Respondent Burden and Cost Year Two – Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2024 Final Rule)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, And Utilization of Technology and Systems <sup>c</sup>	N/A							
4. Reporting Requirements								
a. Familiarization with Regulatory Requirements	2	1	2	35	70	4	7	\$8,175.55
b. Required Activities								
Initial performance tests for existing kilns <sup>d,e</sup>	N/A							
Visible emission (VE) report for material handling <sup>g</sup>	N/A							
Annual inspection of capture, collection, and transport system <sup>h</sup>	N/A							
Inspection and maintenance of affected sources, control devices, and monitoring systems according to operation, maintenance, and monitoring plan <sup>i</sup>	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 <sup>c</sup>	N/A							
Notification of Construction/Reconstruction <sup>c</sup>	N/A							
Notification of Anticipated Startup <sup>c</sup>	N/A							

Notification of Actual Startup <sup>c</sup>	N/A							
Notification of Special Compliance Requirements	N/A							
Compliance Extension Request <sup>c</sup>	N/A							
Notification of Initial and Repeat Performance Tests <sup>d,e</sup>	2	1	2	0	0	0	0	\$0.00
Notification of Opacity/VE Observations	N/A							
Plan <sup>c</sup>	N/A							
Startup, Shutdown, and Malfunction Plan <sup>c</sup>	N/A							
Site-Specific Test Plan <sup>c</sup>	N/A							
Notification of Compliance Status <sup>c</sup>	N/A							
Waiver Application	N/A							
Semiannual Compliance Reports <sup>j</sup>	8	2	16	35	560	28	56	\$65,404.36
Emergency Startup, Shutdown, and Malfunction Reports <sup>k,l</sup>	8	1	8	35	280	14.0	28	\$32,702.18
<b>Subtotal for Reporting Requirements</b>						<b>1,208</b>		<b>\$122,633</b>
5. Recordkeeping Requirements								
a. Familiarization with Regulatory Requirements	See 4A							
b. Plan Activities	N/A							
c. Implement Activities <sup>m</sup>	N/A							
d. Develop Record System	N/A							
e. Time to Enter Information								
Record of All Information Required by Standards <sup>n</sup>	3	52	156	35	5,460	273	546	\$637,692.51
f. Train Personnel <sup>o</sup>	N/A							
g. Time to Adjust Existing Ways to Comply with Previously Applicable Requirements <sup>p</sup>	N/A							
h. Time to Transmit or Disclose Information <sup>q</sup>	0.25	2	0.5	35	18	0.9	1.8	\$2,043.89
g. Time for Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>6,299</b>		<b>\$639,736</b>
<b>Total Labor Burden and Costs (rounded) <sup>r</sup></b>						<b>7,510</b>		<b>\$760,000</b>

<b>Capital and O&amp;M Cost (rounded) <sup>r</sup></b>									<b>\$335,000</b>
<b>Grand Total (rounded) <sup>r</sup></b>									<b>\$1,100,000</b>

**Assumptions:**

- 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 respondents 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) (2024 Final Rule)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person - hours per year (E=CxD)	(F) Management person hours per year (F=E $\times$ 0.05)	(G) Clerical person hours per year (G=E $\times$ 0.1)	(H) Total Cost Per Year (\$) <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, And Utilization of Technology and Systems <sup>c</sup>	N/A							
4. Reporting Requirements								
a. Familiarization with Regulatory Requirements	2	1	2	35	70	4	7	\$8,175.55
b. Required Activities								
Initial performance tests for existing kilns <sup>d,e</sup>	N/A							
Visible emission (VE) report for material handling <sup>g</sup>	N/A							
Annual inspection of capture, collection, and transport system <sup>h</sup>	N/A							
Inspection and maintenance of affected sources, control devices, and monitoring systems according to operation, maintenance, and monitoring plan <sup>i</sup>	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 <sup>c</sup>	N/A							
Notification of Construction/Reconstruction <sup>c</sup>	N/A							
Notification of Anticipated Startup <sup>c</sup>	N/A							

Notification of Actual Startup <sup>c</sup>	N/A							
Notification of Special Compliance Requirements	N/A							
Compliance Extension Request <sup>c</sup>	N/A							
Notification of Initial and Repeat Performance Tests <sup>d,e</sup>	2	1	2	0	0	0	0	\$0.00
Notification of Opacity/VE Observations	N/A							
Operation, Maintenance, and Monitoring Plan <sup>c</sup>	N/A							
Startup, Shutdown, and Malfunction Plan <sup>c</sup>	N/A							
Site-Specific Test Plan <sup>c</sup>	N/A							
Notification of Compliance Status <sup>c</sup>	N/A							
Waiver Application	N/A							
Semiannual Compliance Reports <sup>j</sup>	8	2	16	35	560	28	56	\$65,404.36
Emergency Startup, Shutdown, and Malfunction Reports <sup>k,l</sup>	8	1	8	35	280	14.0	28	\$32,702.18
<b>Subtotal for Reporting Requirements</b>						<b>1,208</b>		<b>\$122,633</b>
5. Recordkeeping Requirements								
a. Familiarization with Regulatory Requirements	See 4A							
b. Plan Activities	N/A							
c. Implement Activities <sup>m</sup>	N/A							
d. Develop Record System	N/A							
e. Time to Enter Information								
Record of All Information Required by Standards <sup>n</sup>	3	52	156	35	5,460	273	546	\$637,692.51
f. Train Personnel <sup>o</sup>	N/A							
g. Time to Adjust Existing Ways to Comply with Previously Applicable Requirements <sup>p</sup>	N/A							
h. Time to Transmit or Disclose Information <sup>q</sup>	0.25	2	0.5	35	18	0.9	1.8	\$2,043.89
g. Time for Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>6,299</b>		<b>\$639,736</b>
<b>Total Labor Burden and Costs (rounded) <sup>r</sup></b>						<b>7,510</b>		<b>\$760,000</b>
<b>Capital and O&amp;M Cost (rounded) <sup>r</sup></b>								<b>\$335,000</b>
<b>Grand Total (rounded) <sup>r</sup></b>								<b>\$1,100,000</b>

**Assumptions:**

- 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 respondents 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) (2024 Final Rule)**

<b>Year</b>	<b>Technical Hours</b>	<b>Management Hours</b>	<b>Clerical Hours</b>	<b>Total Labor Hours</b>	<b>Labor Costs</b>	<b>Non-Labor (Capital/Startup and O&amp;M) Costs</b>	<b>Total Costs</b>
1	8,838	442	884	10,163	\$1,030,000	\$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
<b>Total</b>	<b>21,893</b>	<b>1,095</b>	<b>2,189</b>	<b>25,176</b>	<b>\$2,550,000</b>	<b>\$1,005,000</b>	<b>\$3,570,000</b>
<b>Average</b>	<b>7,298</b>	<b>365</b>	<b>730</b>	<b>8,392</b>	<b>\$850,000</b>	<b>\$335,000</b>	<b>\$1,190,000</b>



**Table 5: Average Annual EPA Burden and Cost Year One – Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2024 Final Rule)**

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per respondent per year (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) <sup>b</sup>
Initial Performance Tests <sup>c</sup>	40	1	40	35	1400	70	140	\$80,451.00
Retesting Preparation for Repeat Performance Tests <sup>d</sup>	N/A							
Repeat Performance Tests <sup>d</sup>	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 <sup>e</sup>	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 <sup>f</sup>	4	1	4	35.0	140	7	14	\$8,045.10
<b>Total (rounded)<sup>g</sup></b>						<b>2,290</b>		<b>\$114,600</b>

**Assumptions:**

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: \$43.15 for 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) (2024 Final Rule)**

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per respondent per year (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) <sup>b</sup>
Initial Performance Tests <sup>c</sup>	N/A							
Retesting Preparation for Repeat Performance Tests <sup>d</sup>	N/A							
Repeat Performance Tests <sup>d</sup>	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 <sup>e</sup>	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 <sup>f</sup>	4	1	4	35.0	140	7	14	\$8,045.10
<b>Total (rounded)<sup>g</sup></b>						<b>640</b>		<b>\$32,200</b>

**Assumptions:**

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: \$43.15 for 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) (2024 Final Rule)**

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per respondent per year (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) <sup>b</sup>
Initial Performance Tests <sup>c</sup>	N/A							
Retesting Preparation for Repeat Performance Tests <sup>d</sup>	N/A							
Repeat Performance Tests <sup>d</sup>	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 <sup>e</sup>	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 <sup>f</sup>	4	1	4	35.0	140	7	14	\$8,045.10
<b>Total (rounded)<sup>g</sup></b>					<b>640</b>			<b>\$32,200</b>

**Assumptions:**

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: \$43.15 for 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) (2024 Final Rule)**

<b>Year</b>	<b>Technical Hours</b>	<b>Management Hours</b>	<b>Clerical Hours</b>	<b>Total Hours</b>	<b>Labor Costs</b>	<b>Non-Labor Costs</b>	<b>Total Costs</b>
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
<b>Total</b>	<b>3,115</b>	<b>156</b>	<b>312</b>	<b>3,582</b>	<b>\$179,000</b>	<b>\$0</b>	<b>\$179,000</b>
<b>Average</b>	<b>1,038</b>	<b>52</b>	<b>104</b>	<b>1,194</b>	<b>\$59,700</b>	<b>\$0</b>	<b>\$59,700</b>

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>a</sup>	(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	34	0	0	34
2	0	34	0	0	34
3	0	34	0	0	34
Average	0	34	0	0	34

<sup>a</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.



## Total Annual Responses

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(B \times C)+D$
Notification of applicability	34	1	0	34
Notification of construction/reconstruction	N/A	0	0	N/A
Notification of anticipated startup	N/A	0	0	N/A
Notification of actual startup	N/A	0	0	N/A
Notification of special compliance requirements	N/A	0	0	N/A
Compliance extension request	N/A	0	0	N/A
Notification of performance tests	34	1	0	34
Notification of opacity/VE observations	N/A	0	0	N/A
Operation, maintenance, and monitoring plans	34	1	0	34
Startup, shutdown, and	N/A	0	0	N/A

<b>Total Annual Responses</b>				
malfunction plans				
Site-specific test plan	34	1	0	34
Notification of compliance status	34	1	0	34
Waiver application	N/A	0	0	N/A
Semiannual compliance reports	34	1	0	34
Emergency startup, shutdown, or malfunction reports	34	1	0	34
			<b>Total</b>	<b>238</b>