

ATTACHMENT 1
SUPPORTING STATEMENT

National Emission Standards for Hazardous Air Pollutants for Lime Manufacture

TABLES 1, 2, and 3

Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Lime Manufacturing Industry

TABLE 4

Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Lime Manufacturing Industry

TABLES 5, 6, and 7

Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Lime Manufacturing Industry

TABLE 8

Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Lime Manufacturing Industry

uring Plants (40 CFR Part 63, Subpart AAAAA)

acturing NESHAP LEAN Proposed Rule – Years 1-3

Lime Manufacturing NESHAP LEAN Proposed Rule

ring NESHAP LEAN Proposed Rule - Year 1-3

ie Manufacturing NESHAP LEAN Proposed Rule

Respondent Wages (\$2021)	
Category (1)	Hourly Mean Wage (2)
Managerial	\$56.06
Technical	\$50.74
Clerical	\$20.70
Footnotes:	
(1) The Wage categories "Technical," "Clerical," and "Managerial" ref codes 11-3051, 43-6010, and 11-1021, respectively, in the United States Bureau of Labor Statistics table titled "May 2021 National Industry-Specific Employment and Wage Estimates NAICS 327000 - Nonmetallic Mineral Product Manufacturing," found here:	
https://www.bls.gov/oes/current/naics3_327000.htm	
(2) Loaded Wage is the 2021 Wage increased by 110 percent to account for benefit packages available to those employed by private industry.	

EPA Wages (\$2016)	
Category (1)	Hourly Mean Wage (2)
(GS- 12, step 1) - Technical	\$32.02
(GS- 13, step 5) - Managerial	\$43.15
(GS-6, step 3) - Clerical	\$17.33
Footnotes:	
(1) The hourly mean wage for each category is based on 2021 wages, as reported in the OPM Salary Schedule.	
https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-schedules/	
(2) Wage with fringe and overhead is the hourly mean wage increased by 110 percent to account for benefit packages available to government employees.	

Loaded Wage (3)
\$117.73
\$106.56
\$43.47
er to the labor category es Department of Labor, pecific Occupational ral Product nt for the benefit

Wage With Fringe & Overhead (3)
\$51.24
\$69.04
\$27.73
and are found here: ry-tables/21Tables/html/GS by 60 percent to account

Table A: 2020 ICR (OMB Control No. 2060-0544) Annual Respondent Burden and Cost – Lime Manufactu

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year
1. Applications	N/A	
2. Survey and Studies	N/A	
3. Acquisition, Installation, And Utilization of Technology and Systems ^c	40	1
4. Reporting Requirements		
a. Familiarization with Regulatory Requirements	2	1
b. Required Activities		
Repeat performance tests for existing kilns and material handling ^{d, e, f}	40	1
Visible emission (VE) report for material handling ^g	8	1
Annual inspection of capture, collection, and transport system ^h	8	1
Inspection and maintenance of affected sources, control devices, and monitoring systems according to operation, maintenance, and monitoring plan ⁱ	4	1
c. Create Information	See 4B	
d. Gather Existing Information	See 4B	
e. Write Report		
Notification of Applicability ^c	2	1
Notification of Construction/Reconstruction ^c	2	1
Notification of Anticipated Startup ^c	2	1
Notification of Actual Startup ^c	2	1
Notification of Special Compliance Requirements	N/A	
Compliance Extension Request ^c	2	1
Notification of Initial and Repeat Performance Tests ^{d, e, f}	2	1
Notification of Opacity/VE Observations	2	1
Operation, Maintenance, and Monitoring Plan ^c	40	1
Startup, Shutdown, and Malfunction Plan ^c	40	1
Site-Specific Test Plan ^c	40	1
Notification of Compliance Status ^c	8	1
Waiver Application	N/A	
Semiannual Compliance Reports ^j	8	2
Emergency Startup, Shutdown, and Malfunction Reports ^{k, l}	8	1
Subtotal for Reporting Requirements		
5. Recordkeeping Requirements		
a. Familiarization with Regulatory Requirements	See 4A	
b. Plan Activities	3	1
c. Implement Activities ^m	12	1
d. Develop Record System	3	1
e. Time to Enter Information		
Record of All Information Required by Standards ⁿ	3	52

f. Train Personnel ^o	3	1
g. Time to Adjust Existing Waste to Comply with Previously Applicable Requirements ^p	3	1
h. Time to Transmit or Disclose Information ^q	0.25	2
g. Time for Audits	N/A	
Subtotal for Recordkeeping Requirements		
Total Labor Burden and Costs (rounded) ^r		
Capital and O&M Cost (rounded) ^r		
Grand Total (rounded) ^r		

Assumptions:

- a. Assumed that the average number of respondents that will be subject to the rule will be 36 existing respondents. There will be a one-year period of this ICR for an average of 37 existing and new respondents per year.
- b. This ICR uses the following labor rates: \$141.06 per hour for Executive, Administrative, and Managerial labor; \$120.27 per hour for the United States Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by Occupational Category." These rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- c. This is a one-time only activity. New facilities install kilns and material handling equipment. New facilities submit notification of construction.
- d. Assumed that there will be a total of three new kilns brought into production (installed) over the three-year period of the ICR. The initial Method 5 test. The performance testing costs are covered in Section 6(b)(iii) of the Supporting Statement.
- e. Respondents must conduct repeat performance tests on existing kilns every 5 years to demonstrate continuous compliance. There are 20.4 performance tests per year (102 affected kilns/5 years).
- f. Respondents must conduct repeat performance tests on existing materials handling operations whose emissions exit through affected materials handling operations with stacks that would conduct a Method 5 performance test every 5 years. The number of materials handling operations/5 years).
- g. Assumed that each respondent will take 8 hours to complete the annual visible emission (VE) tests for material handling.
- h. Assumed that each respondent will take 8 hours to complete the annual inspection of the capture, collection, and transport system.
- i. Assumed that each respondent will take 4 hours to complete the inspection and maintenance of affected sources, control devices, and monitoring systems.
- j. Assumed that it will take 8 hours each and two times per year to complete semiannual compliance reports.
- k. Assumed that it will take 8 hours once a year to write the emergency startup, shutdown, or malfunction reports.
- l. Assumed that 5 percent of respondents will have to complete the emergency startup, shutdown, or malfunction reports.
- m. Assumed that it will take 12 hours to record activities implemented.
- n. Assumed that all respondents will take 3 hours each to enter records of all the required information 52 times a year.
- o. Assumed that it will take 3 hours to train each personnel.
- p. Assumed that it will take 3 hours for each respondent to adjust existing ways to comply with previously applicable requirements.
- q. Assumed that respondents are required to transmit/disclose information twice per year.
- r. Totals are rounded to three significant figures. Figures may not add up exactly due to rounding.

Table B: 2020 ICR (OMB Control No. 2060-0544) Average Annual EPA Burden and Cost – NESHAP for L

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year
Initial Performance Tests ^c	40	1
Retesting Preparation for Repeat Performance Tests ^d	2	1
Repeat Performance Tests ^d	40	1
Report Review		

Notification of Applicability	1	1
Notification of Construction/Reconstruction	1	1
Notification of Anticipated Startup	1	1
Notification of Actual Startup	1	1
Notification of Special Compliance Requirements	N/A	
Notification of Initial Performance Tests	1	1
Notification of Compliance Status	4	1
Review of Repeat Performance Test Report ^e	2	1
Review of Semiannual Compliance Report	4	2
Review of Waiver Application	N/A	
Review of Emergency Startup, Shutdown, and Malfunction Report ^f	4	1
Total (rounded) ^g		

Assumptions:

- a. Assumed that the average number of respondents that will be subject to the rule will be 36 existing respondents. There will be a one-year period of this ICR for an average of 37 existing and new respondents per year.
- b. This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical labor. These rates exclude locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available.
- c. One new source per year will conduct a performance test on their kiln and materials handling operations. The Agency will conduct the test.
- d. To demonstrate continuous compliance, plants must conduct repeat performance tests every 5 years. The number of respondents to conduct the test is (1 respondent/materials handling operations)/5 years = 22.6 performance tests per year). Assumed that it will take 40 hours for respondents to conduct the test.
- e. Assumed that it will take 2 hours for respondents to review repeat performance test report.
- f. Assumed five percent of sources will need to submit emergency startup, shutdown, and malfunction reports.
- g. Totals have been rounded to three significant figures. Figures may not add together exactly due to rounding.

aring Plants (40 CFR Part 63, Subpart AAAAA)

(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) ^b
40	1	40	2	4	\$5,327.60
2	37	74	4	7	\$9,856.06
40	22.6	904	45	90	\$120,403.76
8	37	296	15	30	\$39,424.24
8	37	296	15	30	\$39,424.24
4	37	148	7	15	\$19,712.12
2	1	2	0.1	0.2	\$266.38
2	1	2	0.1	0.2	\$266.38
2	1	2	0.1	0.2	\$266.38
2	1	2	0.1	0.2	\$266.38
2	1	2	0.1	0.2	\$266.38
2	23.6	47	2	5	\$6,286.57
2	37	74	4	7	\$9,856.06
40	1	40	2	4	\$5,327.60
40	1	40	2	4	\$5,327.60
40	1	40	2	4	\$5,327.60
8	1	8	0.4	0.8	\$1,065.52
16	37	592	30	59	\$78,848.48
8	1.9	15	0.7	1	\$1,971.21
		3,018			\$349,491
3	1	3	0.2	0.3	\$399.57
12	1	12	0.6	1.2	\$1,598.28
3	1	3	0.2	0.3	\$399.57
156	37	5,772	289	577	\$768,772.68

3	1	3	0.2	0.3	\$399.57
3	1	3	0.2	0.3	\$399.57
0.5	37	19	0.9	1.9	\$2,464.02
		6,687			\$774,433
		9,700			\$1,120,000
					\$335,000
					\$1,460,000

l be one additional new source per year that will become subject to the rule over the three-

er hour for Technical labor, and \$58.67 per hour for Clerical labor. These rates are from and Industry group.” The rates are from column 1, “Total Compensation.” The rates have

ations and plans.

CR. This averages out to one unit per year. One new kiln per year is expected to conduct an

. There are 102 existing affected kilns. The number of respondents to repeat a performance

h stacks every 5 years to demonstrate continuous compliance. There are 11 existing er of respondents to repeat a performance test is 2.2 performance tests per year (11 affected

system.

ervices, and monitoring systems according to operation, maintenance, and monitoring plan.

ments.

Time Manufacturing (40 CFR Part 63, Subpart AAAAA)

(C) EPA person hours per respondent per year (C=AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) ^b
40	1	40	2	4	\$2,217.84
2	22.6	45	2.26	4.5	\$2,506.16
40	22.6	904	45	90	\$50,123.18

1	1	1	0.05	0.1	\$55.45
1	1	1	0.05	0.1	\$55.45
1	1	1	0.05	0.1	\$55.45
1	1	1	0.05	0.1	\$55.45
1	1	1	0.05	0.1	\$55.45
4	1	4	0.2	0.4	\$221.78
2	22.6	45	2.3	4.5	\$2,506.16
8	37	296	15	30	\$16,412.02
4	1.9	7.6	0.38	0.76	\$421.39
		1,550			\$74,700

l be one additional new source per year that will become subject to the rule over the three-

e rates are from the Office of Personnel Management (OPM), 2019 General Schedule,
le to government employees.

spend 40 hours to attend the test and review the performance test report.

ndents to repeat performance test is 22.6 tests/year ((102 existing kilns + 11 existing
o repeat performance tests.

2020 ICR Hourly Wages	
Managerial	\$141.06
Technical	\$120.27
Clerical	\$58.67

2020 ICR Labor Rates	
Management	\$66.62
Technical	\$49.44
Clerical	\$26.75

Table 1 : Annual Respondent Burden and Cost Year One – Lime Manufacturing Plants (40 CFR

Burden item	(A) Person hours per occurrence
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
b. Required Activities	
Initial performance tests for existing kilns ^{d, e}	40
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
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
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
Emergency Startup, Shutdown, and Malfunction Reports ^{k, l}	8
Subtotal for Reporting Requirements	
5. Recordkeeping Requirements	
a. Familiarization with Regulatory Requirements	See 4A
b. Plan Activities	3
c. Implement Activities ^m	12
d. Develop Record System	3
e. Time to Enter Information	
Record of All Information Required by Standards ⁿ	3
f. Train Personnel ^o	3

g. Time to Adjust Existing Ways to Comply with Previously Applicable Requirements ^p	3
h. Time to Transmit or Disclose Information ^q	0.25
g. Time for Audits	N/A
Subtotal for Recordkeeping Requirements	
Total Labor Burden and Costs (rounded) ^r	
Capital and O&M Cost (rounded) ^r	
Grand Total (rounded) ^r	

Assumptions:

- a. Assumed that the average number of respondents that will be subject to the rule will be 35 existing respondents.
- b. This ICR uses the United States Department of Labor, Bureau of Labor Statistics, May 2021 National Industry Product Manufacturing. The mean hourly rate (column 8 of the table) for occupational codes 11-1021 *General and Administrative Assistants* were used for Managerial (\$56.06), Technical (\$50.74), and clerical (\$20.70) respectively 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.
- 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 report.
- 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.

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(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(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 (\$) ^b
1	2	35	70	4	7	\$8,175.55
1	40	35	1,400	70	140	\$163,510.90
1	4	35	140	7	14	\$16,351.09
1	2	35	70	4	7	\$8,175.55
2	16	35	560	28	56	\$65,404.36
1	8	35	280	14.0	28	\$32,702.18
			2,898			\$294,320
1	3	35	105	5.3	10.5	\$12,263.32
1	12	35	420	21.0	42.0	\$49,053.27
1	3	35	105	5.3	10.5	\$12,263.32
52	156	35	5,460	273	546	\$637,692.51
1	3	35	105	5.3	10.5	\$12,263.32

1	3	35	105	5.3	10.5	\$12,263.32
2	0.5	35	18	0.9	1.8	\$2,043.89
			7,265			\$737,843
			10,160			\$1,030,000
						\$335,000
						\$1,370,000

ts. There will be no new sources per year that will become subject to the rule.

y-Specific Occupational Employment and Wages Estimates for NAICS 327000 - *Nonmetallic Mineral and Operational Managers*, 11-3051 *Industrial Production Managers*, and 43-6010 *Secretaries and* ely. The rates have been increased by 110 percent to account for the benefit packages available to those

s compliance.

es, control devices, and monitoring systems according to operation, maintenance, and monitoring plan.

ts.

year.

able requirements.

Hourly Wages	
Managerial	\$117.73
Technical	\$106.56
Clerical	\$43.47

Table 2 : Annual Respondent Burden and Cost Year Two – Lime Manufacturing Plants (40 CFE

Burden item	(A) Person hours per occurrence
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
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
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
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
Emergency Startup, Shutdown, and Malfunction Reports ^{k, l}	8
Subtotal for Reporting Requirements	
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
f. Train Personnel ^o	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
g. Time for Audits	N/A
Subtotal for Recordkeeping Requirements	
Total Labor Burden and Costs (rounded) ^r	
Capital and O&M Cost (rounded) ^r	
Grand Total (rounded) ^r	

Assumptions:

- a. Assumed that the average number of respondents that will be subject to the rule will be 35 existing respondents.
- b. This ICR uses the United States Department of Labor, Bureau of Labor Statistics, May 2021 National Industry Product Manufacturing. The mean hourly rate (column 8 of the table) for occupational codes 11-1021 *General and Administrative Assistants* were used for Managerial (\$56.06), Technical (\$50.74), and clerical (\$20.70) respectively 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.
- 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 report.
- 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.

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(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) ^b
1	2	35	70	4	7	\$8,175.55
1	4	35	140	7	14	\$16,351.09
1	2	0	0	0	0	\$0.00
2	16	35	560	28	56	\$65,404.36
1	8	35	280	14.0	28	\$32,702.18
			1,208			\$122,633
52	156	35	5,460	273	546	\$637,692.51

2	0.5	35	18	0.9	1.8	\$2,043.89
			6,299			\$639,736
			7,510			\$760,000
						\$335,000
						\$1,100,000

ts. There will be no new sources per year that will become subject to the rule.

y-Specific Occupational Employment and Wages Estiates for NAICS 327000 - *Nonmetallic Mineral and Operational Managers*, 11-3051 *Industrial Production Managers*, and 43-6010 *Secretaries and* ely. The rates have been increased by 110 percent to account for the benefit packages available to those

; compliance.

es, control devices, and monitoring systems according to operation, maintenance, and monitoring plan.

ts.

year.

Hourly Wages	
Managerial	\$117.73
Technical	\$106.56
Clerical	\$43.47

Table 3 : Annual Respondent Burden and Cost Year Three – Lime Manufacturing Plants (40 CF

Burden item	(A) Person hours per occurrence
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
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
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
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
Emergency Startup, Shutdown, and Malfunction Reports ^{k, l}	8
Subtotal for Reporting Requirements	
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
f. Train Personnel ^o	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
g. Time for Audits	N/A
Subtotal for Recordkeeping Requirements	
Total Labor Burden and Costs (rounded) ^r	
Capital and O&M Cost (rounded) ^r	
Grand Total (rounded) ^r	

Assumptions:

- a. Assumed that the average number of respondents that will be subject to the rule will be 35 existing respondent.
- b. This ICR uses the United States Department of Labor, Bureau of Labor Statistics, May 2021 National Industry *Product Manufacturing*. The mean hourly rate (column 8 of the table) for occupational codes 11-1021 *General and Administrative Assistants* were used for Managerial (\$56.06), Technical (\$50.74), and clerical (\$20.70) respective 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
- f. Assumed that each respondent will take 4 hours to complete the inspection and maintenance of affected source
- 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 report
- 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 y
- 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.

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(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) ^b
1	2	35	70	4	7	\$8,175.55
1	4	35	140	7	14	\$16,351.09
1	2	0	0	0	0	\$0.00
2	16	35	560	28	56	\$65,404.36
1	8	35	280	14.0	28	\$32,702.18
			1,208			\$122,633
52	156	35	5,460	273	546	\$637,692.51

2	0.5	35	18	0.9	1.8	\$2,043.89
			6,299			\$639,736
			7,510			\$760,000
						\$335,000
						\$1,100,000

s. There will be no new sources per year that will become subject to the rule.

-Specific Occupational Employment and Wages Estimates for NAICS 327000 - *Nonmetallic Mineral and Operational Managers*, 11-3051 *Industrial Production Managers*, and 43-6010 *Secretaries and* ly. The rates have been increased by 110 percent to account for the benefit packages available to those

compliance.

s, control devices, and monitoring systems according to operation, maintenance, and monitoring plan.

s.

ear.

Hourly Wages	
Managerial	\$117.73
Technical	\$106.56
Clerical	\$43.47

Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requi

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

Requirements for the Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2024 Final

Total Costs
\$1,370,000
\$1,100,000
\$1,100,000
\$3,570,000
\$1,190,000

[**Rule)**

Table 5: Average Annual EPA Burden and Cost Year One – Lime Manufacturing Plants (40 CFR

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year
Initial Performance Tests ^c	40	1
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
Notification of Compliance Status	4	1
Review of Repeat Performance Test Report ^e	N/A	
Review of Semiannual Compliance Report	4	2
Review of Waiver Application	N/A	
Review of Emergency Startup, Shutdown, and Malfunction Report ^f	4	1
Total (rounded) ^g		

Assumptions:

- Assumed that the average number of respondents that will be subject to the rule will be 35 existing respondents. There will be 35 existing respondents of this ICR.
- This ICR uses the following labor rates: \$43.15 for managerial, \$32.02 for technical, and \$17.33 for clerical labor. These rates exclude locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to respondents.
- No new sources per year for this action.
- To demonstrate continuous compliance, plants must conduct repeat performance tests every 5 years. Assumed that it will take 2 hours for respondents to review repeat performance test report.
- Assumed that it will take 2 hours for respondents to review repeat performance test report.
- Totals have been rounded to three significant figures. Figures may not add together exactly due to rounding.

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(C) EPA person hours per respondent per year (C=AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) ^b
40	35	1400	70	140	\$80,451.00
1	35	35	1.75	3.5	\$2,011.28
4	35	140	7	14	\$8,045.10
8	35	280	14	28	\$16,090.20
4	35.0	140	7	14	\$8,045.10
		2,290			\$114,600

I be no new sources per year that will become subject to the rule over the three-year period

Salaries are from the Office of Personnel Management (OPM), 2020 General Schedule, GS-15, for government employees.

take 40 hours for respondents to repeat performance tests.

Labor Rates	
Management	\$69.04
Technical	\$51.24
Clerical	\$27.73

Table 6: Average Annual EPA Burden and Cost Year Two – Lime Manufacturing Plants (40 CFR

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year
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
Review of Repeat Performance Test Report ^e	N/A	
Review of Semiannual Compliance Report	4	2
Review of Waiver Application	N/A	
Review of Emergency Startup, Shutdown, and Malfunction Report ^f	4	1
Total (rounded) ^g		

Assumptions:

- a. Assumed that the average number of respondents that will be subject to the rule will be 35 existing respondents. There will be 35 existing respondents 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 exclude locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to 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 2 hours for respondents to review repeat performance test report.
- 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.

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(C) EPA person hours per respondent per year (C=AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) ^b
4	35	140	7	14	\$8,045.10
8	35	280	14	28	\$16,090.20
4	35.0	140	7	14	\$8,045.10
640					\$32,200

I be no new sources per year that will become subject to the rule over the three-year period

e rates are from the Office of Personnel Management (OPM), 2020 General Schedule,
le to government employees.

ake 40 hours for respondents to repeat performance tests.

Labor Rates	
Management	\$69.04
Technical	\$51.24
Clerical	\$27.73

Table 7: Average Annual EPA Burden and Cost Year Three – Lime Manufacturing Plants (40 CF

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year
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
Review of Repeat Performance Test Report ^e	N/A	
Review of Semiannual Compliance Report	4	2
Review of Waiver Application	N/A	
Review of Emergency Startup, Shutdown, and Malfunction Report ^f	4	1
Total (rounded) ^g		

Assumptions:

- a. Assumed that the average number of respondents that will be subject to the rule will be 35 existing respondents. There will be 35 existing respondents 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 exclude locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to 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 2 hours for respondents to review repeat performance test report.
- 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.

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(C) EPA person hours per respondent per year (C=AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per Year (\$) ^b
4	35	140	7	14	\$8,045.10
8	35	280	14	28	\$16,090.20
4	35.0	140	7	14	\$8,045.10
		640			\$32,200

I be no new sources per year that will become subject to the rule over the three-year period

rates are from the Office of Personnel Management (OPM), 2020 General Schedule,
le to government employees.

ake 40 hours for respondents to repeat performance tests.

Labor Rates	
Management	\$69.04
Technical	\$51.24
Clerical	\$27.73

Table 8 - Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting

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

Requirements for the Lime Manufacturing Plants (40 CFR Part 63, Subpart AAAAA) (2024

Total Costs
\$114,600
\$32,200
\$32,200
\$179,000
\$59,700

↓ **Final Rule)**