ICR Summary Information	
Hours per Response	331
Number of Respondents	3
Total Estimated Burden Hours	2,650
Total Estimated Costs	$458,000
Annualized Capital O&M	$124,000
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NESHAP for Clay Ceramics (40 CFR Part 63,

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 [a]
1. Applications				
2. Survey and Studies				
3. Reporting requirements				
A. Familiarize with regulatory requirements [c]	1	1	1	3
B. Required Activities				
i. Develop OM&M plan [d]	200	1	200	0
ii. Update OM&M plan	10	1	10	3
iii. Conduct control device maintenance / inspections	30	1	30	3
iv. Conduct shuttle kiln maintenance/ inspections	160	1	160	3
C. Create Information	See 3B			
D. Gather existing information	See 3B			
E. Write Report				
i. Initial notification of applicability [d]	6	1	6	0
ii. Notification of construction/reconstruction [d]	28	1	28	0
iii. Notification of anticipated startup [d]	3	1	3	0
iv. Notification of actual startup [d]	3	1	3	0
v. Request to use control device maintenance alternative standard [d]	4	1	4	0
vi. Notification of performance test [l]	6	1	6	0.6
vii. Notification of compliance status [d,e]	24	1	24	0.6
viii. Report of performance test (through ERT)	20	1	20	0.6
ix. Notification of alternative fuel use [f]	2	1	2	0.3
x. First compliance report	30	1	30	0
xi. Semi-annual compliance reports				
Deviations [g]	30	2	60	0.45
No deviations [g]	12	2	24	2.55
xii. Report of alternative fuel use [f]	4	2	8	0.3
Subtotal for Reporting Requirements				
4. Recordkeeping requirements				
A. Read instructions	See 3A			
B. Plan activities				
i. Prepare for initial performance test	24	1	24	0.6
ii. Prepare for repeat performance test [h]	24	1	24	0.06
C. Implement activities				
i. Attend initial performance test	34	2.5	85	0.6
ii. Attend repeat performance test [h]	34	2.5	85	0.06
D. Develop record system	60	6	360	0
E. Time to enter information				

i. Records of compliance data	8	52	416	3
ii. Records of alternative fuel use	1	12	12	0.3
iii. Records of APCD maintenance/ inspections	See 3B			
iv. Records of compliance with work practices	See 3B			
v. Records of deviations	2	12	24	3
F. Time to train personnel [i]				
i. Initial training	48	6	288	0
ii. Annual training	10	6	60	3
G. Time to transmit/disclose information [j]	0.25	1	0.25	3
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Costs (rounded) [k]				
Total Capital and O&M Cost (rounded) [k]				
GRAND TOTAL (rounded) [m]				

Assumptions:

[a] We assume that an average of 3 respondents will be subject to this rule, and that no new sources will become subject to

[b] This ICR uses the following labor rates: Managerial $163.17 ($77.70+ 110%); Technical $130.28 ($62.04 + 110%); and United States Department of Labor, Bureau of Labor Statistics, September 2022, "Table 2. Civilian Workers, by occupatic compensation." The rates have been increased by 110 percent to account for varying industry wage rates and the additiona wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

[c] We have assumed that existing respondents will have to familiarize with the regulatory requirements each year.

[d] One-time only activities.

[e] The notification of compliance status includes the performance test report and documentation of any other initial compli

[f] Assumes 10% of facilities will use an alternative fuel once per year.

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

[h] We have assumed that an average of 3 respondents will conduct performance tests once every five years, for an average year). Assumes 10% of plants fail initial performance test and must repeat it. Based on comments from industry, an averag travel for plant personnel. Repeat testing is also required 5 years following initial testing.

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

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

[k] Based on estimates in Clay Ceramics Monitoring and Testing Requirements and Costs Memo. Stack testing costs assume EPA Method 26A for HF and HCl, and EPA Method 23 for dioxins/furans. VE testing costs assume EPA Method 22.

[l] We have assumed that an average of 3 respondents will conduct performance tests once every five years, for an average o year). We have also assumed 10% of plants will fail an initial performance test and must repeat it.

[m] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Subpart KKKKK) (Renewal)

(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
3	0	0	$435.03
0	0	0	$0
30	2	3	$4,350.29
90	5	9	$13,050.86
480	24	48	$69,604.56
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
3.6	0.18	0.36	$522.03
14	0.72	1.44	$2,088.14
12	0.6	1.2	$1,740.11
0.6	0.03	0.06	$87.01
0	0	0	$0
27	1.35	2.70	$3,915.26
61	3.06	6.12	$8,874.58
2.4	0.12	0.24	$348.02
833			***$105,016***
14	0.72	1.44	$2,088.14
1.4	0.072	0.144	$208.81
51	2.55	5.1	$7,395.48
5	0.255	0.51	$739.55
0	0	0	$0.00

Labor Rates	
Management	$163.17
Technical	$130.28
Clerical	$65.71

1,248	62.4	124.8	$180,971.86
4	0.18	0.36	$522.03
72	3.6	7.2	$10,440.68
0	0	0	$0
180	9	18	$26,101.71
0.8	0.04	0.08	$108.76
1,813			***$228,577***
2,650			***$334,000***
			$124,000
			$458,000

331 hr/response

the rule over the three-year period of the ICR.

Clerical $65.71 ($31.29 + 110%). These rates are from the
ɔnal and industry group." The rates are from column 1, "Total
l overhead business costs of employing workers beyond their

ance demonstration.

of 0.6 sources per year (3 sources/5 years = 0.6 sources per
ge of 2.5 plant personnel attend performance tests. Assume no

ınel.

e EPA Method 5 or 29 for PM, EPA Method 29 for metals,

ɔf 0.6 sources per year (3 sources/5 years = 0.6 sources per

Table 2: Average Annual EPA Burden and Cost – NESHAP for Clay Ceramics (40 CFR Part 63, S

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 [a]
1. Attend initial performance test [c]	24	1	24	0.06
2. Attend repeat performance test [c,d]				
Retesting preparation	8	1	8	0.006
Retesting	24	1	24	0.006
3. Litigation [e]	2,080	1	2080	0.03
4. Excess emissions enforcement activities [f]	48	1	48	0.15
5. Report review				
Initial notification of applicability	2	1	2	0
Notification of constr./reconstr.	2	1	2	0
Notification of anticipated startup	2	1	2	0
Notification of actual startup	2	1	2	0
Request to use APCD maintenance alternative standard	2	1	2	0
Notification of performance test	2	1	2	0.6
Notification of compliance status [g]	60	1	60	0.6
Notification of alternative fuel use[h]	2	1	2	0.3
Repeat performance test report [d]	40	1	40	0.06
First compliance report	4	1	4	0
Semi-annual compliance reports:				
Deviations [i]	8	2	16	0.45
No deviations [i]	2	2	4	2.55
Report of alternative fuel use [h]	1	1	1	0.3
TOTAL BURDEN AND COST (SALARY)(rounded) [j]				
Travel Expenses for Tests Attended [k]				
TOTAL ANNUAL COST (SALARY + EXPENSES)(rounded) [k]				

Assumptions:

[a] We assume that an average of 3 respondents will be subject to this rule, and that no new sources will become subject to the

[b] This cost is based on the average hourly labor rate as follows: Managerial $73.46 (GS-13, Step 5, $45.91 + 60%); Technical (GS-6, Step 3, $18.44 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, wh by 60 percent to account for the benefit packages available to government employees.

[c] We have assumed that an average of 3 respondents will conduct performance tests once every five years, for an average of 0 We have also assumed Agency personnel will attend performance tests at 10% of plants (0.6 sources per year * 10% = 0.06).

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

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

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

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

[h] Assumes 10% of facilities will use an alternative fuel once per year.

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

[j] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

[k] Assumes Agency personnel (1 person) will spend 2 days per plant plus time for travel, at $166 per diem per day, and $400 tr

ubpart KKKKK) (Renewal)

(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, $ [b]
1.44	0.072	0.144	$88.03
0.048	0.0024	0.0048	$2.93
0.144	0.0072	0.0144	$8.80
62.4	3.12	6.24	$3,814.70
7.2	0.36	0.72	$440.16
0	0	0	$0.00
0	0	0	$0.00
0	0	0	$0.00
0	0	0	$0.00
0	0	0	$0.00
1.2	0.06	0.12	$73.36
36	1.8	3.6	$2,200.79
0.6	0.03	0.06	$36.68
2.4	0.12	0.24	$146.72
0	0	0	$0.00
7.2	0.36	0.72	$440.16
10	0.5	1	$623.56
0.3	0.015	0.03	$18.34
149			**$7,890**
			$48
			$7,940

rule over the three-year period of the ICR.

l $54.51 (GS-12, Step 1, $34.07 + 60%); and Clerical $29.50
ich excludes locality rates of pay. The rates have been increased

.6 sources per year (3 sources/5 years = 0.6 sources per year).

the repeat tests.

ıe retests.

ansportation expense per round trip to attend performance tests.

Labor Rates	
Management	$73.46
Technical	$54.51
Clerical	$29.50

		Capital/Startup vs.
(A)	**(B)**	**(C)**
Continuous Monitoring Device	**Capital/Startup Cost for One Respondent**	**Number of Respondents**
CAPITAL COSTS:		
Initial performance tests [a, b]	$65,500	0
Repeat performance tests [a, b]	$65,500	0
Photocopy/postage [c]		
Visible emissions tests [a,c]	$26,858	0
Totals (rounded) [d]		

[a] Based on estimates in Clay Ceramics Monitoring and Testing Requirements and Costs Memo. S and EPA Method 23 for dioxins/furans. VE testing costs assume EPA Method 22. Annualized co interest rate (%) and t = equipment life (years).

[b] We have assumed that an average of 3 repsondents will conduct performance tests once every fi fail an initial performance test and must repeat it.

[c] O&M costs for photocopying and postage are estimated as $145 per year per respondent. The m the control system and therefore adds no additional capital or O&M cost. The O&M cost associat preparing for/documenting the VE test (occurs after 3-year ICR clearance period).

[d] Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

Operation and Maintenance (O&M) Costs

(D)	(E)	(F)	(G)
Total Capital/Startup Cost, (B X C)	**Annual O&M Costs for One Respondent**	**Number of Respondents with O&M**	**Total O&M, (E X F)**
$0	$65,500	0.6	$39,300
$0	$65,500	0.06	$3,930
	$145	3	$435
$0	$26,858	3	$80,574
$0			**$124,000**

tack testing costs assume EPA Method 5 or 29 for PM, EPA Method 29 for metals, EPA Method 26A for HF and HCl,
sts are calculated by multiplying the capital recovery factor (CRF) by the capital cost. CRF=(i)*(1+i)t/((1+i)t-1) where i =

ve years, for an average of 0.6 sources per year (3 sources/5 years = 0.6 sources per year). Assumes 10% of plants will

onitoring equipment needed to monitor parameters other than visible emissions (e.g., lime feed rate) is included as part of
ed with VE monitoring includes VE training for two people every 5 years, conducting the 15-minute VE test, and

Total Annual Responses			
(A)	(B)	(C)	(D)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports
Initial notification of applicability	0	1	0
Notification of construction/ reconstruction	0	1	0
Notification of anticipated startup	0	1	0
Notification of actual startup	0	1	0
Request to use APCD maintenance alternative standard	0	1	0
Notification of performance test	0.6	1	0
Notification of compliance status	0.6	1	0
Report of performance test (through ERT)	0.6	1	0
Notification of alternative fuel use	0.3	1	0
First compliance report	0	1	0
Semi-annual compliance reports:			
Deviation	0.45	2	0
No deviation	2.55	2	0
Report of alternative fuel use	0.3	1	0
			Total (rounded)

(E)
Total Annual Responses E=(BxC)+D
0
0
0
0
0
0.6
0.6
0.6
0.3
0
0.9
5.1
0.3
8

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents [a]	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents
1	0	3	0	0
2	0	3	0	0
3	0	3	0	0
Average	0	3	0	0

[a] New respondents include sources with constructed and reconstructed affected facilities.

(E)
Number of Respondents (E=A+B+C-D)
3
3
3
3