

ICR Summary Information

Hours Per Response	19
Number of Respondents	3
Total Estimated Burden Hours	341
Total Estimated Costs	\$134,000
Annualized Capital O&M	\$87,000
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NESHAP for Refractory Products Manufacturing (40 CFR Part 63, Subpart SSSSS) (Renewal)

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	(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) Total Cost per year, \$ ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarization with the regulatory requirements ^c	2	1	2	3	6	0.3	0.6	\$945
B. Required activities								
Develop an operation, maintenance, monitoring plan	32	1	32	0	0	0	0	\$0
Update operation, maintenance, monitoring plan ^d	4	1	4	1	4	0.2	0.4	\$630
Performance tests and reports ^e	75	1	75	1.8	135	6.75	13.5	\$21,263
Performance retests and reports ^e	24	1	24	0.2	4.8	0.24	0.48	\$756
Initial CMS performance evaluation ^f	12	1	12	0	0	0	0	\$0
Initial CEMS demonstration ^g	229	1	229	0	0	0	0	\$0
Quarterly Appendix F audits of CEMS (THC) ^g								
a) RATA audit (one per year)	4	1	4	0	0	0	0	\$0
b) RAA audit (three per year)	4	3	12	0	0	0	0	\$0
c) Daily calibration and operation	1	365	365	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report								
Notification of applicability	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of performance test ^e	2	1	2	2	4	0.2	0.4	\$630
Notification of compliance status	16	1	16	2	32	1.6	3.2	\$5,040
Notification of intent to use alternative fuel ^h	2	1	2	0	0	0	0	\$0
Request approval to bypass the control device for maintenance ⁱ	1	6	6	1	6	0.3	0.6	\$945
Semi-annual compliance report with deviations ^j	16	1	16	2	32	1.6	3.2	\$5,040
Semi-annual compliance report with no deviations ^k	8	2	16	2	32	1.6	3.2	\$5,040
Report of alternative fuel use ^l	4	1	4	0	0	0	0	\$0
Subtotal for Reporting Requirements					294			\$40,290
4. Recordkeeping Requirements								

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	(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) Total Cost per year, \$ ^b
A. Familiarization with rule requirements	See 3A							
B. Plan activities	See 4E							
C. Implement activities	See 4E							
D. Develop record system	See 4E							
E. Time to enter information								
Records of all information required by standards ^m	0.25	52	13	3	39	1.95	3.9	\$6,143
F. Time to train personnel	20	1	20	0	0	0	0	\$0
G. Time to transmit or disclose information ⁿ	0.25	3	0.75	3	2.25	0.1125	0.225	\$354
H. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					47			\$6,497
TOTAL ANNUAL BURDEN AND COSTS (rounded): ^o					341			\$46,800
TOTAL CAPITAL/O&M COST (rounded): ^o								\$87,000
GRAND TOTAL (rounded): ^o								\$134,000

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be three. There will be no additional new source per year that will become subject to the rule over the 3-year period of this ICR.

^b This ICR uses the following labor rates: Managerial \$172.41 (\$82.10+ 110%); Technical \$141.75 (\$67.50 + 110%); and Clerical \$71.36 (\$33.98 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2023, “Table 2. Civilian workers by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates are increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

^c We have assumed that the number of person-hours per occurrence is an average over 3 years of Year 1 (5), Year 2 (0.5), and Year 3(0.5) with more effort in Year 1.

^d We have assumed that all three facilities will need to update their plan, for an average number of respondents of 1 per year.

^e The person-hours per response account for tests on both continuous and batch sources. Tests for continuous sources may be shorter than average and tests for batch sources may be longer than average. In addition, we have assumed that the respondents per year is 1.8 for performance testing since there are effectively 9 separate sets of tests that would have to be done every 5 years across the three facilities. This estimate of 9 tests is based on EPA’s previous estimate of 4 tests for 2 facilities plus 5 additional sources being tested based on industry comments received for the ICR renewal. We have also assumed that one test will need to be redone each five years, or 0.2 respondents per year.

^f We assume 12 hours are required to complete the CMS performance evaluation. This activity only applies to new sources.

^g We have assumed that there are no existing respondents required to comply using THC CEMS.

^h § 63.9812(f) states that on and after November 19, 2021, facilities may not use a fuel other than natural gas or equivalent to fire the affected kiln.

ⁱ Facilities must request approval to bypass the control device for each instance of control device maintenance. The estimated number of requests per year is based on information from industry regarding the types of scheduled routine maintenance.

^j We have assumed that two respondents will report a deviation once per year.

^k We have assumed that one respondent will report no deviations on a semi-annual basis and the other two respondents will report no deviations for one of the two semi-annual reports per year.

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	(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) Total Cost per year, \$ ^b
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¹ § 63.9814(g) states that on and after November 19, 2021, facilities may not use a fuel other than natural gas or equivalent to fire the affected kiln.

^m We have assumed that information will be recorded once per week for 52 weeks per year.

ⁿ We have assumed that it will take 0.25 hours for information to be transmitted or disclosed, and two semi-annual reports with at least one more report (e.g. notification of fuel change) will be submitted annually.

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

Table 2: Average Annual EPA Burden and Cost – NESHAP for Refractory Products Manufacturing (40 CFR Part 63, Subpart SSSSS) (Renewal)

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year ^a	(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) Total Cost per year, \$ ^b
Attend initial performance test	48	1	48	1.8	86.4	4.32	8.64	\$5,530
Attend repeat performance test								
Retesting preparation	8	1	8	0.2	1.6	0.08	0.16	\$102
Retesting	20	1	20	0.2	4	0.2	0.4	\$256
Report review								
Notification of applicability	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of performance test	2	1	2	2	4	0.2	0.4	\$256
Notification of compliance status	2	1	2	2	4	0.2	0.4	\$256
Notification of intent to use alternative fuel ^c	2	1	2	0	0	0	0	\$0
Request for approval to bypass the control device for maintenance	2	6	12	1	12	0.6	1.2	\$768
Review performance test report	40	1	40	2	80	4	8	\$5,120
Semi-annual compliance reports								
Deviation ^d	16	1	16	2	32	1.6	3.2	\$2,048
No Deviation ^e	8	2	16	2	32	1.6	3.2	\$2,048
Report of alternative fuel use ^f	2	1	2	0	0	0	0	\$0
TOTAL ANNUAL BURDEN AND COST (rounded) ^g					294			\$16,400

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be three. There will be no additional new source per year that will become subject to the rule over the 3-year period of this ICR.

^b This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%); Technical \$57.07 (GS-12, Step 1, \$35.67 + 60%); and Clerical \$30.88 (GS-6, Step 3, \$19.30+ 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2024 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 § 63.9812(f) states that on and after November 19, 2021, facilities may not use a fuel other than natural gas or equivalent to fire the affected kiln.

^d We have assumed that two respondents will report deviations once a year.

^e We have assumed that one respondent will report no deviations twice a year and that the other two respondents will report no deviations for one of the two semi-annual reports.

^f § 63.9814(g) states that on and after November 19, 2021, facilities may not use a fuel other than natural gas or equivalent to fire the affected kiln.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B x C)	Annual O&M Costs for One Respondent ^a	Number of Respondents with O&M	Total O&M, (E x F)
Continuous parameter monitoring system ^b	\$25,715	0	\$0	\$581	3	\$1,743
Visible emissions checks ^c				\$12,645	2	\$25,289
Performance Testing ^d			\$60,000			
Total (rounded) ^e			\$60,000			\$27,000

^a Capital/Startup and Annual O&M costs have been updated from 2009 to 2023 (Continuous parameter monitoring system) and 2021 to 2023 (Visible emissions checks) using the CEPCI Index.

^b It is assumed that no existing sources have installed CEMS.

^c Required for compliance with the proposed particulate matter standards for clay refractory kilns. There are two facilities with clay refractory kilns.

^d Respondents with affected sources are required to conduct performance testing to demonstrate compliance every 5 years. Across the 3 years of the ICR, the cost of the tests conducted in each year is estimated to be \$60,000 per year.

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

CEPCI Index	
2009	521.9
2021	708
2023	797.9

\$87,000

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

^a New respondents include facilities with affected facilities constructed or reconstructed during the 3

nts	
(D)	(E)
Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
0	3
0	3
0	3
0	3

-year period of this ICR. Existing respondents include facilities with

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(B \times C)+D$
Notification of applicability	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of anticipated startup	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test	2	1	0	2
Notification of compliance status	2	1	0	2
Notification of intent to use alternative fuel	0	1	0	0
Request approval to bypass the control device for maintenance	1	6	0	6
Semi-annual compliance report with deviations	2	1	0	2
Semi-annual compliance report with no deviations	2	2	0	4
Report of alternative fuel use	0	1	0	0
Performance testing results	2	1	0	2
			Total	18