

**TABLE 1: Annual Respondent Burden and Cost-NESHAP for Lime Manufacturing (40 CFR part 63, subpart AAAAA)**

REPORTING/RECORDKEEPING REQUIREMENT	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondent s per Year <sup>a</sup>	(E) Technical Hours per Year @ \$97.59 (E=C x D)	(F) Management Hours per Year @ \$114.77 (F= E x 0.05)	(G) Clerical Hours per Year @ \$48.26 (G= E x 0.1)	Total Labor Costs per Year
1. APPLICATIONS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2. SURVEY AND STUDIES	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS <sup>b</sup>	40	1	40	1	40	2	4	\$4,326.18
4. REPORTING REQUIREMENTS								
a. Read Instructions <sup>b</sup>	2	1	2	1	2	0.1	0.2	\$216.31
b. Required Activities								
Repeat performance tests <sup>c</sup>	40	1	40	12.2	488	24.4	48.8	\$52,779.40
Visible emission (VE) report for material handling <sup>f</sup>	8	1	8	62	496	24.8	49.6	\$53,644.63
Annual inspection of capture, collection, and transport system <sup>g</sup>	8	1	8	62	496	24.8	49.6	\$53,644.63
Inspection and maintenance of affected sources, control devices, and monitoring systems according to operation, maintenance, and monitoring plan <sup>h</sup>	4	1	4	62	248	12.4	24.8	\$26,822.32
c. Create Information	-----Included in 4b-----							
d. Gather Existing Information	-----Included in 4b-----							
e. Write Report								
Notification of Applicability <sup>b</sup>	2	1	2	1	2	0.1	0.2	\$216.31
Notification of Construction/Reconstruction <sup>b</sup>	2	1	2	1	2	0.1	0.2	\$216.31
Notification of Anticipated Startup <sup>b</sup>	2	1	2	1	2	0.1	0.2	\$216.31
Notification of Actual Startup <sup>b</sup>	2	1	2	1	2	0.1	0.2	\$216.31
Notification of Special Compliance Requirements	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Compliance Extension Request <sup>b</sup>	2	1	2	1	2	0.1	0.2	\$216.31
Notification of Performance Test	2	1	2	13.2	26.4	1.32	2.64	\$2,855.28
Notification of Opacity/VE Observations	2	1	2	62	124	6.2	12.4	\$13,411.16
Operation, Maintenance, and Monitoring Plan <sup>b</sup>	40	1	40	1	40	2	4	\$4,326.18
Startup, Shutdown, and Malfunction Plan <sup>b</sup>	40	1	40	1	40	2	4	\$4,326.18
Site-Specific Test Plan <sup>b</sup>	40	1	40	1	40	2	4	\$4,326.18

Notification of Compliance Status <sup>b</sup>	8	1	8	1	8	0.4	0.8	\$865.24
Waiver Application	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Semiannual Compliance Reports <sup>l</sup>	8	2	16	62	992	49.6	99.2	\$107,289.26
Emergency Startup, Shutdown, and Malfunction Reports <sup>j, k</sup>	8	1	8	3.1	25	1.2	2.5	\$2,682.23
	Total Reporting Hours by Labor Category				1,305	65	131	
<b>TOTAL REPORTING BURDEN</b>						<b>1,501</b>	<b>Hours</b>	<b>\$141,163</b>
5. RECORDKEEPING REQUIREMENTS								
a. Read Instructions	-----Included in 4a-----							
b. Plan Activities	3	1	3	1	3	0.15	0.3	\$324.46
c. Implement Activities <sup>l</sup>	12	1	12	1	12	0.6	1.2	\$1,297.85
d. Develop Record System	3	1	3	1	3	0.15	0.3	\$324.46
e. Time to Enter Information								
Record of All Information Required by Standards <sup>m</sup>	3	52	156	62	9,672	484	967	\$1,046,070.32
f. Train Personnel <sup>n</sup>	3	1	3	1	3	0.15	0.3	\$324.46
g. Time to Adjust Existing Waste to Comply with Previously Applicable Requirements <sup>o</sup>	3	1	3	1	3	0.15	0.3	\$324.46
h. Time to Transmit or Disclose Information <sup>p</sup>	0.25	2	0.50	62	31	1.55	3.1	\$3,352.79
g. Time for Audits	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Total Recordkeeping Hours by Labor Category				11,497	575	1,150	
<b>TOTAL RECORDKEEPING BURDEN</b>						<b>13,222</b>	<b>Hours</b>	<b>\$1,243,452</b>
	Total Hours by Labor Category				12,802	640	1,280	
<b>TOTAL ANNUAL LABOR BURDEN AND COST</b>						<b>14,723</b>	<b>Hours</b>	<b>\$1,384,616</b>
6. ANNUAL CAPITAL COSTS								
a. Performance test for kilns <sup>c, d</sup>				13.2				\$17,750
b. Performance test for material handling <sup>c, e</sup>				13.2				\$17,750
c. Bag Leak Detector <sup>p</sup>				62				\$88,908
<b>TOTAL ANNUAL CAPITAL and O&amp;M COSTS</b>								<b>\$124,408</b>

Assumptions

a. Assumed that the average number of respondent that will be subject to the rule will be 61 existing respondents. There will be one additional new source per year that will become subject to the rule over the three-year period of this ICR.

b. This is a one-time only activity.

tests per year (61 existing respondents/5years). The cost to conduct a repeat Method 5 performance test is \$5,000. The annualized capital cost to conduct this test is \$1,250 per year.

d. Assumed that there will be a total of three new kilns in production over the three year period of the ICR, which will average out to one unit per year. The cost for an initial Method 5 test is \$10,000, and the annualized cost for an initial performance test is \$2,500 per new unit. One new unit per year is expected to conduct an initial Method 5 test.

- e. Assumed that each existing plant has a material handling operation that would conduct a Method 5 performance test every 5 years. The number of respondents to conduct subsequent performance tests each year would be 61 existing respondents/5 years, or 12.2 respondents per year. Each respondent would incur an annual cost of \$1,250 to perform subsequent Method 5 performance tests. Each new respondent is assumed to have a material handling operation that would conduct an initial Method 5 performance test. The cost of the initial test is \$2,500 per new unit.
- f. Assumed that each respondent will take 8 hours to complete the annual visible emission (VE) tests for material handling.
- g. Assumed that each respondent will take 8 hours to complete the annual inspection of the capture, collection, and transport system.
- h. 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.

**TABLE 2: Annual Agency Burden and Cost - NESHAP for Lime Manufacturing (40 CFR part 63, subpart AAAAA)**

REPORTING/RECORDKEEPING REQUIREMENT	(A) EPA Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year <sup>a</sup>	(E) Technical Hours per Year @ \$45.52 (E=C x D)	(F) Management Hours per Year @ \$61.36 (F= E x 0.05)	(G) Clerical Hours per Year @ \$24.64 (G= E x 4)	Costs per Year
INITIAL PERFORMANCE TESTS	40	1	40	1	40	2		\$2,042.08
RETESTING PREPARATION FOR REPEAT PERFORMANCE TESTS <sup>b</sup>	2	1	2	12.2	24.4	1.22	2.44	\$1,245.67
REPEAT PERFORMANCE TEST <sup>b, c</sup>	40	1	40	12.2	488	24.4	48.8	\$24,913.38
REPORT REVIEW								
Notification of Applicability	1	1	1	1	1	0.05	0.1	\$51.05
Notification of Construction/Reconstruction	1	1	1	1	1	0.05	0.1	\$51.05
Notification of Anticipated Startup	1	1	1	1	1	0.05	0.1	\$51.05
Notification of Actual Startup	1	1	1	1	1	0.05	0.1	\$51.05
Notification of Special Compliance Requirements	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Notification of Initial Performance Tests	1	1	1	1	1	0.05	0.1	\$51.05
Notification of Compliance Status	4	1	4	1	4	0.2	0.4	\$204.21
Review of Repeat Performance Test Report <sup>b, d</sup>	2	1	2	12.2	24.4	1.22	2.44	\$1,245.67
Review of Semiannual Compliance Report	4	2	8	62	496	24.8	49.6	\$25,321.79
Review of Waiver Application	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Review of Emergency Startup, Shutdown, and Malfunction Report <sup>e</sup>	4	1	4	3.1	12.4	0.62	1.24	\$633.04
SALARY BURDEN (per year)					1,094.2	54.71	109.42	\$55,861
<b>TOTAL ANNUAL BURDEN</b>						<b>1,258</b>		<b>\$55,861</b>

Assumptions

- Assumed that the average number of respondents that will be subject to the rule will be 61 existing respondents. There will be one additional new source per year that will become subject to the rule over the three-year period of this ICR for an average of 62 existing and new respondents per year.
- To demonstrate continuous compliance, plants must conduct repeat performance tests every 5 years. The number of respondents to repeat performance test is 12.2 test/year (61 existing respondents/5years = 12.2 performance tests per year) starting in the second year of this ICR.
- Assumed that it will take 40 hours for respondents to repeat performance tests.
- Assumed that it will take 2 hours for respondents to review repeat performance test report.
- Assumed five percent of sources will need to submit emergency startup, shutdown, and malfunction reports.