

SUPPORTING STATEMENT

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) FOR AREA SOURCES: POLYVINYL CHLORIDE AND COPOLYMER PRODUCTION, PRIMARY COPPER SMELTING, SECONDARY COPPER SMELTING, AND PRIMARY NONFERROUS METALS--ZINC, CADMIUM, AND BERYLLIUM

PART A

1.0 Identification of the Information Collection

(a) Title and Number of the Information Collection.

“NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium.” This is a new information collection request (ICR) and the EPA tracking number is 2240.01.

(b) Short Characterization.

This ICR covers information collection requirements in the proposed area source rules for primary copper smelting (40 CFR part 63, Subpart EEEEEEE), secondary copper smelting (40 CFR part 63, subpart FFFFFFF), and primary zinc production facilities (part of the primary nonferrous metals category) in §§63.11162 through 11164 of 40 CFR part 63, Subpart GGGGGG. The proposed area source rules for polyvinyl chloride and copolymer production in 40 CFR part 63, Subpart DDDDDD and primary beryllium production facilities (part of the primary nonferrous metals category) in §§63.11165 and 11166 of 40 CFR part 63, Subpart GGGGGG do not impose any new information collection burden. New and existing polyvinyl chloride and copolymer plants that are area sources would be required to comply with the same testing, monitoring, recordkeeping, and reporting requirements as those in the National Emission

Standard for Vinyl Chloride (40 CFR part 61, Subpart F). The OMB has previously approved the information collection requirements in 40 CFR Part 61, Subpart F (OMB control number 2060-0071, EPA ICR no. 186.10). New and existing primary beryllium production facilities that are area sources would be required to comply with the same testing, monitoring, recordkeeping, and reporting requirements as those in the National Emission Standard for Beryllium (40 CFR part 61, Subpart C). The OMB has previously approved the information collection requirements in 40 CFR Part 61, Subpart C (OMB control number 2060-0092, EPA ICR number 0193.08).

Potential respondents are owners or operators of a new or existing primary copper smelter, a new secondary copper smelter, or a new or existing primary zinc production facility that is an area source of hazardous air pollutants (HAP) emissions. For existing facilities, the proposed NESHAP adopt the same emissions limits, work practice standards, and compliance provisions that are currently required in the facility's Title V permits for the control of particulate matter (PM). An existing primary copper smelting area source would be subject to a facility-wide PM emissions limit; proposed compliance requirements include a continuous PM sampler, monthly monitoring reports, reports of deviations, semiannual monitoring reports, and recordkeeping requirements. An existing primary zinc production facility would be subject to equipment/work practice standards for the control of roaster exhaust gases and PM emissions limits for different types of furnaces. Proposed compliance provisions include baghouse monitoring and maintenance requirements, reports of deviations, semiannual monitoring reports, and recordkeeping requirements. The proposed NESHAP also requires repeat PM performance tests (once every 5 years) for regulated emissions sources. Any sintering machine at a primary

zinc production area source would be subject to the PM and opacity limits in the new source performance standard (NSPS) for primary zinc smelters (40 CFR part 60, subpart Q) and associated monitoring requirements. The NSPS requires a continuous opacity monitoring system (COMS) for sintering machines.

The proposed requirements for new primary copper smelters include a facility-wide PM emissions limit with a continuous emissions monitoring system (CEMS) to measure and record the PM concentration and gas flow rate of the regulated emissions sources and a device to measure and record the weight of copper concentrate feed. Monthly monitoring reports would also be required. EPA Performance Specification 11 (40 CFR part 60, appendix B) would apply to the CEMS. The owner or operator of a new secondary copper smelter would be required to meet a PM emissions limit, operate bag leak detection systems, and conduct repeat PM performance tests. A proposed work practice standard requires a written plan for the selection, inspection, and pretreatment of copper scrap to minimize the amount of oil and plastics in the scrap that are charged to furnaces. A new primary zinc production facility would be subject to PM emissions limits for regulated emissions sources and the equipment/work practice standard for roasters. Bag leak detection systems and repeat PM performance tests would also be required. Any sintering machine would be subject to the NSPS requirements; EPA Performance Specification 1 (40 CFR Part 60, Appendix B) would apply to a COMS.

New and existing area sources would be subject to requirements in the General Provisions (40 CFR Part 63, Subpart A). An existing affected source would be required to submit an initial notification of applicability and a notification of compliance status. The owner or operator of an existing affected source would be allowed to certify initial compliance with PM

limits based on previous performance test results; performance tests would be required to demonstrate initial compliance for a new affected source. The owner or operator of an existing affected source would also be required to comply with the requirements for startup, shutdown, and malfunction (SSM) plans and reports in 40 CFR 63.6(e)(3). All requirements in the General Provisions would apply to the owner or operator of a new affected source.

The proposed information collection requirements for existing and new area sources are listed in Attachments 1A and 1B.

2. Need For and Use of the Collection

(a) Need/Authority for the Collection.

Section 112 of the Clean Air Act (CAA) requires EPA to establish NESHAP for both major and area sources of HAP that are listed for regulation under CAA section 112(c). An area source is a stationary source that is not a major source (i.e., an area source does not emit and does not have the potential to emit more than 10 tons per year of any single HAP or more than 25 tons per year of any combination of HAP). Requirements for area sources in CAA sections 112(c)(3) and 112(k) direct EPA to (1) identify at least 30 air toxics that present the greatest potential health threat in the largest number of urban areas and (2) to identify sufficient area source categories to ensure that sources representing 90 percent or more of the of the emissions of the 30 “listed” HAP are subject to regulation. EPA implements these requirements through the Integrated Urban Air Toxics Strategy (64 FR 38715, July 19, 1999). Each of the source categories included in the proposed NESHAP are on the Integrated Urban Air Toxics Strategy

Area Source Category List.¹

¹ The Secondary Copper Smelting and Cadmium Refining and Cadmium Oxide Production source categories were added to the area source category list on June 26, 2002 (67 FR 43112). The listing of secondary copper smelting was based on HAP emissions of cadmium, lead, and dioxin. On November 22, 2002 (67 FR 70427), we added Primary Copper Smelters to the area source category list based on HAP metal emissions (arsenic,

Under CAA section 112(d)(5), we may elect to promulgate HAP standards for area sources based on the use of generally available control technology (GACT) or management practices used by the sources. We can consider costs and economic impacts in determining GACT, which is particularly important when developing regulations for source categories that may have few establishments and many small businesses, or when determining whether additional control is needed for sources that are already well-controlled as a result of other air emissions standards.

Facilities in these source categories are current well control as a result of State and national standards and permitting requirements for criteria pollutants that obtain co-control of HAP. Therefore, we have developed the proposed standards to reflect the application of GACT. Except for new secondary copper smelters, GACT is equivalent to the levels of control that are currently required for these sources. We are proposing these standards at this time in response to a court-ordered deadline that requires promulgation of four area source categories by December 15, 2006 (Sierra Club v. U.S. Environmental Protection Agency, no. 01-1537, DC Cir.).

Certain records and reports are necessary for the Administrator to confirm the compliance status of area sources, identify any new or reconstructed sources subject to the standards, and confirm that the GACT standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the Clean Air Act (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions. The recordkeeping and reporting requirements for Title V permits are contained in 40 CFR 70.6 and 40 CFR 71.6. Under parts 63 and 70 or 71, the owner or operator must keep each record for 5 (cadmium, chromium, lead, and nickel), changed the name of the Cadmium Refining and Cadmium Oxide Production source category to Primary Nonferrous Metals-Zinc, Cadmium and Beryllium, and expanded the scope of the Primary Nonferrous Metals source category. The listing of primary nonferrous metals was based on HAP metal emissions of arsenic, cadmium, lead, manganese, and nickel.

years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(b) Use/Users of the Data.

The information will be used by the delegated authority (State agency or Regional Administrator if there is no delegated State agency) to ensure that the emissions limits and other requirements are being achieved. Based on review of the recorded information at the site and the reported information, the delegated permitting authority can identify facilities that may not be in compliance and decide which plants, records, or processes may need inspection.

3. Nonduplication, Consultations, and Other Collection Criteria

(a) Nonduplication.

Primary copper smelters and primary zinc production facilities are subject to the NSPS in 40 CFR part 60, subparts Q and R, respectively. NESHAP for major sources of HAP also apply to primary copper smelters (40 CFR Part 63, Subpart QQQ). Existing facilities have title V operating permits that incorporate the information collection requirements of the permitting regulations in 40 CFR Parts 70 or 71, the NSPS, National Ambient Air Quality Standards, and other requirements. The proposed NESHAP prevent duplication of similar information requests by adopting the same information collection requirements established in the title V permit. By codifying the current requirements, the proposed NESHAP do not require existing facilities to change the testing, monitoring, recordkeeping, and reporting requirements that are already in place. New area sources would be required to comply with the notification, testing, monitoring, operation and maintenance, recordkeeping, and reporting requirements in the part 63 General Provisions.

The last secondary copper smelter closed in 2001. A computer search of the Federal Information Locator System indicated that there are no similar information requests for secondary copper smelters being carried out by the Federal government; and a similar search of EPA's ongoing ICR's revealed no duplication of information-gathering efforts.

(b) Public Notice Required Prior to ICR Submission to OMB.

This section is not applicable because this is a rule-related ICR.

(c) Consultations.

The proposed rules were developed in consultation with individual plants and a trade association. The non-EPA persons consulted on the information collection activities are identified in Table 1.

TABLE 1. PERSONS CONSULTED ON THE INFORMATION COLLECTION ACTIVITIES

Contact	Organization	Telephone Number
James Mallory	Non-Ferrous Founders' Society	(847) 299-0950
Jedd Griffin	Zinifex	(931) 552-4200
Mike Altepeter	Big River Zinc	(618) 274-5000
Steve Sands	Kennecott Copper	(901) 238-2400

(d) Effects of Less Frequent Collection.

If the relevant information were collected less frequently, the delegated permitting authority (State or EPA) would not be reasonably assured that a plant is in compliance with the standards.

(e) General Guidelines.

None of the guidelines in 5 CFR 1320.6 are being exceeded.

(f) Confidentiality.

All 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 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

(g) Sensitive Questions.

This section is not applicable because this ICR does not involve matters of a sensitive nature.

4. The Respondents and the Information Requested

(a) Respondents/NAIC Codes.

Potential respondents under proposed Subpart EEEEEEE are owners or operators of new and existing primary copper smelters that are area sources of HAP. The NAICS code for primary copper smelters is 331411. We estimate that one primary copper smelter would be subject to the proposed NESHAP; no new area sources are projected during the 3 year period of this ICR.

Potential respondents under proposed subpart FFFFFFF are owners or operators of new secondary copper smelters that are area sources of HAP. Secondary copper smelters are part of the broad NAICS code 331423, which also includes copper, brass, and bronze ingot makers. The section 112(k) listing for secondary copper smelters was based on a small subset of this NAICS code and does not include ingot makers. There are no existing secondary copper smelters in the U.S., and no new secondary copper smelting area sources are expected during the 3-year period of this ICR.

Potential respondents under proposed subpart GGGGGG are owners of operators of new and existing primary zinc smelters that are area sources of HAP. The NAICS code for primary zinc smelters is 331419. We estimate that two primary zinc smelters would be subject to the proposed NESHAP; no new area sources are expected during the 3 year period of this ICR.

(b) Information Requested.

(i) Data Items, Including Recordkeeping Requirements. Attachments 1A and 1B, Source Data and Information Requirements, summarizes the proposed data items, including recordkeeping and reporting requirements.

(ii) Respondent Activities. The respondent activities required by the proposed rules are identified in Tables 2A and 2B and introduced in section 6(a).

5. The Information Collected—Agency Activities, Collection Methodology, and Information Management

(a) Agency Activities.

A list of Agency activities is provided in Tables 3A and 3B and introduced in section 6(c).

(b) Collection Methodology and Management.

Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs of the delegated permitting authority. The monitoring reports submitted to the permitting authority are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. EPA is the permitting authority until the State agency is delegated authority to implement the final rule. Therefore, information contained in the reports submitted to the Regional Administrator will be entered into the Air Facility System (AFS), which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS 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.

(c) Small Entity Flexibility.

The Small Business Administration defines a small entity as a firm having no more than 1,000 employees (for the primary copper smelting industry) or 750 employees (for the secondary copper smelting or primary zinc smelting industries). One of the area source facilities that would be subject to the proposed NESHAP is considered a small entity. However, the proposed NESHAP would not impose any significant compliance costs on that entity or any of the other area source facilities because each facility is already meeting the proposed emissions limits and compliance requirements. The only cost of the proposed NESHAP for existing area sources is for a startup, shutdown, and malfunction plan and one-time notifications.

(d) Collection Schedule.

The specific frequency for each information collection activity within this request is shown in Tables 2A and 2B.

6. Estimating the Burden and Cost of the Collection

(a) *Estimating Respondent Burden.*

The annual burden estimates for the proposed NESHAP are shown in Tables 2A (for subpart EEEEEEE) and 2B (for subpart GGGGGG). These numbers were derived from estimates based on EPA's experience with other standards. No burden estimates are provided for new primary copper or primary zinc area sources because no new facilities are expected during the 3-year period of this ICR. No burden estimates are provided for secondary copper smelters because there are no existing facilities and no new facilities are expected during the 3-year period of this ICR.

(b) *Estimating Respondent Costs.*

The information collection activities for the proposed NESHAP are presented in Tables 2A and 2B. Because the data are already collected by respondents as required by the existing permit requirements for PM, no respondent development costs are associated with the information collection activities.

(i) *Estimating Labor Costs.* Labor rates and associated costs are based on Bureau of Labor Statistics (BLS) data. Technical, management, and clerical average hourly rates for private industry workers were taken from the United States Department of Labor, Bureau of Labor Statistics, December 2005, "Table 2. Civilian Workers, by occupational and industry group" available at <http://www.bls.gov/news.release/ecec.t02.htm>. Wages for occupational groups are used as the basis for the labor rates with a total compensation of \$41.89/hour for technical, \$48.09/hour for managerial, and \$20.86/hour for clerical. These rates represent salaries plus fringe benefits and do not include the cost of overhead. An overhead rate of 110 percent is used to account for these costs. The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$87.98, management at \$100.98, and clerical at \$43.80.

(ii) *Estimating Capital and Operations and Maintenance (O&M) Costs.* The proposed NESHAP does not require the installation of any new control devices or monitoring systems at existing facilities. Capital and O&M costs are not estimated for new sources because no new sources are expected during the next 3-year period. Therefore, no (zero) capital and O&M costs are associated with the proposed NESHAP during the 3-year period of this ICR.

(iii) *Capital/Startup vs. O&M Costs.* Capital/startup costs are not estimated for existing area sources because the proposed NESHAP do not require the installation of any new control devices or monitoring systems or new performance test to demonstrate initial compliance with the emission limits (i.e., assumes sources will use the results of performance tests conducted within the past 5 years to demonstrate initial compliance). Capital/startup costs are not estimated for new sources because no new sources are expected during the next 3-year period. Therefore, no (zero) capital/startup are associated with the proposed NESHAP during the 3-year period of this ICR.

(iv) *Annualizing Capital Costs.* No capital costs are associated with the proposed NESHAP. Therefore, no (zero) annualized costs are associated with the proposed NESHAP during the 3-year period of this ICR.

(c) *Estimating Agency Burden and Cost.*

Because the information collection requirements were developed as an incidental part of standards development, no costs can be attributed to the development of the information collection requirements. Because reporting and recordkeeping requirements on the part of the respondents are required under the operating permits rules in 40 CFR part 70 or part 71 and the part 63 NESHAP General Provisions, no operational costs would be incurred by the Federal Government. Publication and distribution of the information are part of the Compliance Data System, with the result that no Federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of sources that is part of EPA's overall compliance and enforcement program, and, therefore, is not attributable to the ICR. The only costs that the Federal government would incur are user costs associated with the analysis of the reported information, as presented in Tables 3A and 3B.

The Agency labor rates are from the Office of Personnel Management (OPM) 2006 General Schedule which excludes locality rates of pay. These rates can be obtained from Salary Table 2006-GS available on the OPM website, http://www.opm.gov/oca/06tables/html/gs_h.asp. The government employee labor rates are \$14.35/hour for clerical (GS-6, Step 3), \$26.53 for technical (GS-12, Step 1), and \$35.75/hr for management (GS-13, Step 5). These rates were increased by 60 percent to include fringe benefits and overhead. The fully-burdened wage rates

used to represent Agency labor costs are: clerical at \$22.96; technical at \$42.45, and management at \$57.20.

(d) Estimating the Respondent Universe and Total Burden and Costs.

There is one existing primary copper smelting area source. No new sources are expected during the next 3 years. Consequently, the average number of respondents during the 3 year period of this ICR is 0.33. There are two existing primary zinc smelting area sources. No new sources are expected during the next 3 years. Consequently, the average number of respondents during the 3 year period of this ICR is 0.67. The total average number of respondents for all source categories is 1.

The only components of the total annual responses attributable to this ICR are a startup, shutdown, and malfunction plan and two one-time initial notifications for each existing facility. The proposed requirement for repeat PM performance tests would not occur during the 3-year term of this ICR. Therefore, the number of total annual responses for proposed subpart EEEEEEE (primary copper smelting area sources) is estimated as: $(0.33 \text{ annual average respondents} \times 1 \text{ notification}) + (0.33 \text{ annual average respondents} \times 1 \text{ notification}) + (0.33 \text{ annual average respondents} \times 1 \text{ written plan})$. Therefore, the number of total annual responses for proposed subpart EEEEEEE is 0.99 (rounded to 1). The number of total annual responses for subpart GGGG (primary zinc smelters) is estimated as: $(0.67 \text{ annual average respondents} \times 1 \text{ notification}) + (0.67 \text{ annual average respondents} \times 1 \text{ notification}) + (0.67 \text{ annual average respondents} \times 1 \text{ written plan})$. Therefore, the number of total annual responses for subpart GGGGGG is 2.01 (rounded to 2). The total number of responses for the combined sources categories is 3

(e) Bottom Line Burden Hours and Cost Tables.

(i) Respondent tally. The bottom line respondent burden hours and costs, presented in Tables 2A and 2B, are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column.

The average annual burden for the monitoring, recordkeeping, and reporting requirements in proposed subpart EEEEEEE for the one existing primary copper smelting area source is 9 person hours with an annual average cost of \$771 with no annual capital and O&M costs.

The average annual burden for the monitoring, recordkeeping, and reporting requirements in proposed subpart GGGGGG for the two existing primary zinc smelting area sources is 18.5 person hours with an annual average cost of \$1,566 with no annual capital and O&M costs.

The total annual burden for all source categories is 27.5 hours at \$2337 with no annual capital and O&M costs.

(ii) *The Agency tally.* The average annual Federal Government cost is \$286 for 7 total annual hours. The bottom line Agency burden hours and costs presented in Tables 3A and 3B are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column.

(iii) *Variations in the annual bottom line.* This section does not apply since no significant variation is anticipated.

(f) *Reasons for Change in Burden.*

This section does not apply because this is a new ICR.

(g) *Burden Statement*

The average annual respondent burden for the proposed NESHAP for primary copper smelting area sources is estimated at 9 hours. The average annual respondent burden for the proposed NESHAP for primary zinc smelting area sources is estimated at 18.5 hours. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations in 40 CFR part 63 are listed in 40 CFR part 9.

To comment on the Agency's need for this information the accuracy of the provided burden estimates, and any suggestions for minimizing respondent burden, including through the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2006-0510, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room B-102, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air Docket is (202) 566-1927. An electronic version of the public docket is available at <http://www.regulations.gov>. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention Desk Officer for EPA. Please include the EPA Docket ID No. EPA-HQ-OAR-2006-0510 in any correspondence.

NOTE: The EPA Docket Center suffered damage due to flooding during the last week of June 2006. The Docket Center is continuing to operate. However, during the cleanup, there will be temporary changes to Docket Center telephone numbers, addresses, and hours of operation for people who wish to visit the Public Reading Room to view documents. Consult EPA's Federal Register notice at 71 FR 38147 (July 5, 2006) or the EPA website at www.epa.gov/epahome/dockets.htm for current information on docket status, locations and telephone numbers.

PART B

This section is not applicable because statistical methods are not used in data collection associated with the proposed rules.

TABLE 2A. ANNUAL RESPONDENT BURDEN AND COST: NESHAP FOR PRIMARY COPPER SMELTING AREA SOURCES

Burden item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent	(C) Person- hours per respondent (C=A*B)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=C*D)	(F) Management person-hours per year (E*0.05)	(G) Clerical person- hours per year (E*0.1)	(H) Cost ^b , \$
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems ^c	0	0	0	0	0	0	0	0
4. Reporting Requirements								
A. Read instructions	8	1	8	0.33	2.64	0.13	0.26	\$256.79
B. Required activities								
Monitor per Title V permit ^c	0	0	0	0	0	0	0	0
Initial/repeat performance tests ^d	0	0	0	0	0	0	0	0
Prepare startup, shutdown, malfunction plan	4	1	4	0.33	1.32	0.07	0.13	\$128.89
Initial notification of applicability	4	1	4	0.33	1.32	0.07	0.13	\$128.89
Initial notification of compliance status	8	1	8	0.33	2.64	0.13	0.26	\$256.79
Reports per Title V permit ^c	0	0	0	0	0	0	0	0
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
5. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 4A							
C. Implement activities	See 4A							
D. Record all data required by title V permit ^c	0	0	0	0	0	0	0	0
E. Time to transmit or disclose information ^c	0	0	0	0	0	0	0	0
F. Time to train personnel ^c	0	0	0	0	0	0	0	0
G. Time for audits	N/A							
TOTAL LABOR BURDEN AND COST						9 hrs/yr		\$771.36

^a There is one existing primary copper smelter that is an area source. No new sources are projected during the 3-year term of this ICR. Therefore, the average number of respondents per year is 0.33 (1÷3=0.33).

^b This ICR uses the following labor rates: \$100.98 for managerial labor, \$87.98 for technical labor, and \$43.80 for clerical labor. These rates are from the U.S. Department of Labor, Bureau of Labor Statistics, December 2005, ATable 2. Civilian Workers, by occupational and industry group. The rates are from column 1, ATotal compensation. The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c No hours or costs are associated with this burden item because existing plants are already complying with the requirement in their Title V permit.

^d An existing facility may certify initial compliance based on previous PM tests; no new test is required. Repeat tests would not occur during the 3-year period of this ICR.

TABLE 2B. ANNUAL RESPONDENT BURDEN AND COST: NESHAP FOR PRIMARY ZINC PRODUCTION AREA SOURCES

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent	(C) Person-hours per respondent (C=A*B)	(D) Respondents per year ^a	(E) Technical person-hours per year (E=C*D)	(F) Management person-hours per year (E*0.05)	(G) Clerical person-hours per year (E*0.1)	(H) Cost ^b , \$
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems ^c	0	0	0	0	0	0	0	0
4. Reporting Requirements								
A. Read instructions	8	1	8	0.67	5.36	0.27	0.54	\$522.28
B. Required activities								
Monitor per Title V permit ^c	0	0	0	0	0	0	0	0
Initial./Repeat performance tests ^d	0	0	0	0	0	0	0	0
Prepare startup, shutdown, malfunction plan	4	1	4	0.67	2.68	0.13	0.27	\$260.75
Initial notification of applicability	4	1	4	0.67	2.68	0.13	0.27	\$260.75
Initial notification of compliance status	8	1	8	0.67	5.36	0.27	0.54	\$522.28
Reports per Title V permit ^c	0	0	0	0	0	0	0	0
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
5. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 4A							
C. Implement activities	See 4A							
D. Record all data required by title V permit ^c	0	0	0	0	0	0	0	0
E. Time to transmit or disclose information ^c	0	0	0	0	0	0	0	0
F. Time to train personnel ^c	0	0	0	0	0	0	0	0
G. Time for audits	N/A							
TOTAL LABOR BURDEN AND COST						18.5 hrs/yr		\$1,566.06

^a There is one existing primary zinc smelter area source. No new sources are projected during the 3-year term of this ICR. Therefore, the average number of respondents per year is 0.33 (1÷3=0.33).

^b This ICR uses the following labor rates: \$100.98 for managerial labor, \$87.98 for technical labor, and \$43.80 for clerical labor. These rates are from the U.S. s Department of Labor, Bureau of Labor Statistics, December 2005, ATable 2. The rates are from column 1, ATotal compensation. @ The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c No hours or costs are associated with this burden item because existing plants are already complying with the requirement in their Title V operating permit.

^d An existing facility may certify initial compliance based on previous PM tests; no new test is required. Repeat tests would not occur during the 3-year period of this ICR.

TABLE 3A. ANNUAL BURDEN AND COST TO THE AGENCY: NESHP FOR PRIMARY COPPER SMELTING AREA SOURCES

Burden Item	(A) Person hours per occurrence	(B) Occurrences per plant per year	(C) Plants per year ^a	(D) Technical hours/year (D=A*B*C)	(E) Management hours/year (E=0.05*D)	(F) Clerical-hours/year (F=0.1*D)	(G) Cost ^b , \$
Report Review:							
Initial notification of applicability	2	1	0.33	0.66	0.03	0.07	\$31.35
Initial notification of compliance status	4	1	0.33	1.32	0.07	0.13	\$63.01
TOTAL BURDEN AND COST				2.28 hours			\$94.36

Footnotes:

^a There is one existing primary copper smelter that is area source. No new sources are projected during the next 3-year period.. Therefore, the average number of plants per year is 0.33 (1÷3=0.33).No travel is expected.

^b This ICR uses the following average hourly labor rates: 57.20 for managerial (GS-13, Step 5, \$35.75 x 1.6), \$42.45 (GS-12, Step 1, \$26.53 x 1.6) for technical and \$22.96 (GS-6, Step 3, \$14.35 x 1.6) for clerical. These rates are from the Office of Personnel Management (OPM) A2006 General Schedule@ which excludes locality rates of pay.

TABLE 3B. ANNUAL BURDEN AND COST TO THE AGENCY: NESHP FOR PRIMARY ZINC SMELTING AREA SOURCES

Burden Item	(A) Person hours per occurrence	(B) Occurrences per plant per year	(C) Plants per year ^a	(D) Technical hours/year (D=A*B*C)	(E) Management hours/year (E=0.05*D)	(F) Clerical-hours/year (F=0.1*D)	(G) Cost ^b , \$
Report Review:							
Initial notification of applicability	2	1	0.67	1.34	0.07	0.13	\$63.86
Initial notification of compliance status	4	1	0.67	2.68	0.13	0.27	\$127.41
TOTAL BURDEN AND COST				4.62 hours			\$191.27

Footnotes:

^a There are 2 existing primary zinc smelters that are area sources. No new sources are projected during the next 3-year period.. Therefore, the average number of plants per year is 0.67 (2÷3=0.67). No travel is expected.

^b This ICR uses the following average hourly labor rates: 57.20 for managerial (GS-13, Step 5, \$35.75 x 1.6), \$42.45 (GS-12, Step 1, \$26.53 x 1.6) for technical and \$22.96 (GS-6, Step 3, \$14.35 x 1.6) for clerical. These rates are from the Office of Personnel Management (OPM) A2006 General Schedule@ which excludes locality rates of pay.

ATTACHMENT 1A. INFORMATION REQUIREMENTS-- NESHAP FOR PRIMARY COPPER SMELTING AREA SOURCES

Requirement	Citation for existing sources	Citation for new sources	General Provisions citation
Monitoring			
Continuous PM sampler or PM CEMS and calculations of daily average emissions	§63.11148(d)	§63.11149(d), (e)	NA
Notifications			
Notification of applicability	Table 1 to subpart EEEEEEE	Table 1 to subpart EEEEEEE	40 CFR 63.9(a)(2)
Notification of construction/ reconstruction	NA	Table 1 to subpart EEEEEEE	40 CFR 63.9(b)(5)
Notification of special compliance requirements	NA	Table 1 to subpart EEEEEEE	40 CFR 63.9(d)
Notification of performance test	NA	Table 1 to subpart EEEEEEE	40 CFR 63.9(c)
Notification of opacity/VE observations	NA	Table 1 to subpart EEEEEEE	40 CFR 63.9(f)
Additional CMS notifications	NA	Table 1 to subpart EEEEEEE	40 CFR 63.9(g)
Notification of compliance status	Table 1 to subpart EEEEE/ §63.11150(a)	Table 1 to subpart EEEEEEE/ §63.11150(b)	40 CFR 63.9(h)
Notification of changes in information	Table 1 to subpart EEEEE	Table 1 to subpart EEEEEEE	40 CFR 63.9(j)
Plans			
SSM plan	Table 1 to subpart EEEEE	Table 1 to subpart EEEEEEE	40 CFR 63.6(e)(3)
Performance test plan	NA	Table 1 to subpart EEEEEEE	40 CFR 63.7(c)(2)
CMS quality control plan	NA	Table 1 to subpart EEEEEEE	40 CFR 63.8(d)
CMS performance evaluation test plan	NA	Table 1 to subpart EEEEEEE	40 CFR 63.8(e)(3)
Records			
Information to demonstrate compliance	§63.11148(i)	Table 1 to subpart EEEEE/§63.11149(e)	40 CFR 63.10
Reports			
Monthly summary of monitoring data	§63.11148(f)	§63.11149(g)	NA
Report of deviation	§63.11148(g)	NA	NA
Semiannual monitoring report	§63.11148(h)	NA	NA
Initial performance test	§63.1148(e)	§63.11149(f)	40 CFR 63.7(e)(1)
Quality assurance test plan	NA	Table 1 to subpart EEEEEEE	40 CFR 63.7(c)
CMS performance evaluations/report	NA	Table 1 to subpart EEEEEEE	40 CFR 63.8(e)(5)
SSM reports	Table 1 to subpart EEEEEEE	Table 1 to subpart EEEEEEE	40 CFR 63.6(e)(3)
Excess emissions reports	NA	Table 1 to subpart EEEEEEE	40 CFR 63.10(e)(3)

ATTACHMENT 1B. INFORMATION REQUIREMENTS--NESHAP FOR PRIMARY ZINC PRODUCTION AREA SOURCES

Requirement	Citation for existing sources	Citation for new sources	General Provisions citation
<i>Monitoring</i>			
Baghouse	§63.11162(c)	§63.11163(c)	NA
COMS for sintering machine	§63.11162(e)	§63.1163(e)	NA
<i>Notifications</i>			
Notification of applicability	Table 1 to subpart GGGGGG	Table 1 to subpart GGGGGG	40 CFR 63.9(a)(2)
Notification of construction/ reconstruction	NA	Table 1 to subpart GGGGGG	40 CFR 63.9(b)(5)
Notification of special compliance requirements	NA	Table 1 to subpart GGGGGG	40 CFR 63.9(d)
Notification of performance test	NA	Table 1 to subpart GGGGGG	40 CFR 63.9(c)
Notification of opacity/VE observations	NA	Table 1 to subpart GGGGGG	40 CFR 63.9(f)
Additional CMS notifications	NA	Table 1 to subpart GGGGGG	40 CFR 63.9(g)
Notification of compliance status	Table 1 to subpart GGGGGG/ §63.11164(a)	Table 1 to subpart GGGGGG/ §63.11164(b)	40 CFR 63.9(h)
Notification of changes in information	Table 1 to subpart GGGGGG	Table 1 to subpart GGGGGG	40 CFR 63.9(j)
<i>Plans</i>			
SSM plan	Table 1 to subpart GGGGGG	Table 1 to subpart GGGGGG	40 CFR 63.6(e)(3)
Performance test plan	NA	Table 1 to subpart GGGGGG	40 CFR 63.7(c)(2)
CMS quality control plan	NA	Table 1 to subpart GGGGGG	40 CFR 63.8(d)
CMS performance evaluation test plan	NA	Table 1 to subpart GGGGGG	40 CFR 63.8(e)(3)
<i>Records</i>			
Baghouse and monitoring information	§63.11162(c), (j)	Table 1 to subpart GGGGGG/§63.11163(d)	40 CFR 63.10
<i>Reports</i>			
Reports of deviation	§63.11162(h)	NA	NA
Semiannual monitoring reports	§63.11162(i)	NA	NA
Initial /repeat performance tests	§63.11162(f), (g)	§63.11163(g), (h)	40 CFR 63.7(e)(1) 40 CFR 63.6(h)(7)
Quality assurance test plan	NA	Table 1 to subpart GGGGGG	40 CFR 63.7(c)
CMS performance evaluation/report	NA	Table 1 to subpart GGGGGG	40 CFR 63.8(e)(5)
SSM reports	Table 1 to subpart GGGGGG	Table 1 to subpart GGGGGG	40 CFR 63.6(e)(3)
Excess emissions reports	NA	Table 1 to subpart GGGGGG	40 CFR 63.10(e)(3)