

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Secondary Lead Smelter Industry**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for the Secondary Lead Smelter Industry (40 CFR part 63, subpart X)  
(Renewal)

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the regulations published at 40 CFR part 63, subpart X, were proposed on June 9, 1994, (59 FR 29750), and promulgated on June 23, 1995, (60 FR 32587). In response to industry petitions to reconsider, the final rule was amended on June 13, 1997 (62 FR 32209). Entities potentially affected by this rule are owners or operators of secondary lead smelters that operate furnaces to reduce scrap lead metal and lead compounds to elemental lead. The rule applies to secondary lead smelters that use blast, reverberatory, rotary, or electric smelting furnaces to recover lead metal from scrap lead, primarily from used lead-acid automotive-type batteries. The rule provides protection to the public by requiring all secondary lead smelters to meet emission standards reflecting the application of the maximum achievable control technology (MACT). This information is being collected to assure compliance with 40 CFR part 63, subpart X.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NESHAP.

Any owner or operator subject to the provisions of this part will maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Approximately 23 sources are currently subject to the regulation, and no additional sources are expected to become subject to the standard in the next three years. It is further assumed that there is an average of one affected facility per plant respondent.

In the development of this Information Collection Request (ICR), there were no Office of Management and Budget (OMB) Terms of Clearance on the active ICR to be addressed.

The reports required by this rule are submitted directly to state and local pollution control

Agencies, rather than the Federal Government. The Government Paperwork Elimination Act applies only to Federal Agencies.

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, metal (i.e., containing lead compounds) and organic hazardous air pollutants (HAPs) emissions from secondary lead smelting processes cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 63, subpart X.

### **2(b) Practical Utility/Users of the Data**

The control of metal and organic HAPs emissions from secondary lead smelting processes requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of metal and organic HAPs emissions from secondary lead smelting processes are the result of operation of the affected facilities (i.e., smelting furnaces, refining kettles, agglomerating furnaces, dryers and fugitive dust). The subject standards are achieved by the capture of source and fugitive emissions containing total hydrocarbons and lead compounds by adhering to the leak detection and repair plan for baghouses or use of wet scrubbers to control particulate matter and metal hazardous air pollutants.

The notifications required in the applicable regulations are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are

properly installed and operated and/or leaks are being detected and repaired and the regulations are being met. The semiannual, or as determined by the Administrator, emissions reports, i.e., are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

The information generated by the (monitoring, recordkeeping and reporting) requirement described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate the control equipment in compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with the applicable regulations, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

### **3. Nonduplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart X.

#### **3(a) Nonduplication**

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

#### **3(b) Public Notice Required Prior to ICR Submission to OMB**

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register at 71 FR 35652 on June 21, 2006. No comments were received on the burden published in the Federal Register.

#### **3(c) Consultations**

It is our policy to review any comments received since the last ICR renewal including those submitted in response to the first Federal Register notice and respond appropriately. In this case, no comments were received. The Agency's internal industry experts have been consulted. The Agency's internal data sources and any projections of industry growth over the next three years have also been considered.

The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the AFS (AIRS Facility Subsystem) which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of all compliance data. Approximately 23 respondents are currently subject to the regulation, and our consultations with Agency industry experts and industry representatives regarding the growth rate for the industry indicated that no additional respondents per year will become subject to the regulation over the next three years.

It should be noted that the respondents, the industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

### **3(d) Effects of Less Frequent Collection**

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and that emission limitations are met. If the information required by these standards were collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

### **3(e) General Guidelines**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

These standards require affected facilities to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records= retention requirement is consistent with the part 70 permit program and the five-year statute of limitations on which the permit program is based. Also, the retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than five years.

### **3(f) Confidentiality**

The required information has been determined not to be confidential. However, any 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 (CBI), (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

### **3(g) Sensitive Questions**

None of the reporting or recordkeeping requirements contain sensitive questions.

## **4. The Respondents and the Information Requested**

### **4(a) Respondents/SIC and NAICS Codes**

The respondents to the recordkeeping and reporting requirements are owners or operators of secondary lead smelters that operate furnaces to reduce scrap lead metal and lead compounds to elemental lead. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is 3341, which corresponds to the North American Industry Classification System (NAICS) 331492 for Secondary Smelting, Refining, and Alloying of Nonferrous Metal (except Copper and Aluminum). Industries other than secondary lead smelters which are included in this SIC code are not respondents to this ICR.

**4(b) Information Requested**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR 1320.5.

**(i) Data Items**

All data in this ICR that is recorded and/or reported is required by 40 CFR part 63, subpart X.

A source must make the following reports:

<b>Notification Reports for 40 CFR part 63, subpart X</b>	
Construction/reconstruction	63.5
Initial notifications	63.9(b)
Initial performance test	63.7(b), 63.9(e)
Initial performance test results	63.10(d)(2)
Rescheduled initial performance test	63.7(b)(2)
Approval of smelters fugitive dust control standard operating procedures manual, and operating procedures manual for baghouses	63.549(b)
Demonstration of continuous monitoring system	63.9(g)
Compliance status	63.9(h)
Physical or operational change	63.9, 63.10
Periodic startup, shutdown, malfunction reports	63.10(d)(5)(i)
Semiannual, or as determined by the Administrator, monitoring/exceedance summary	63.10(e)(3), 63.550(c)

A source must keep the following records:

<b>Recordkeeping for 40 CFR part 63, subpart X</b>	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	63.10(b)(2)
All reports and notifications	63.10(b)

<b>Recordkeeping for 40 CFR part 63, subpart X</b>	
Record of applicability	63.10(b)(3)
Records of bag leak detection system alarms, including corrective actions	63.550(a)(2)
Records for sources with continuous monitoring systems	63.10(3)
Records of parametric monitoring data, system maintenance and calibration	63.550(a)
Initial and annual compliance test results	63.550(a)(1)
Records are required to be retained for five years, however, only the data of the most recent two years must be kept on-site	63.550(a)

### Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents, continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Read instructions.
Install, operate and maintain baghouses, according to, a standard operating procedures manual and consistent with the manufacturer=s instructions.
Monitor and record pressure drop and liquid supply pressure at the wet scrubber at least once every hour when using this control device for controlling particulate matter and metal HAP emissions from a process fugitive source.
Install, calibrate, maintain, and operate a CMS for temperature monitoring of the afterburner or the combined blast furnace and reverberatory furnace exhaust streams when complying with the total hydrocarbon emission standard.
Install, calibrate, maintain, and operate a total hydrocarbon CMS for measuring emissions when complying with the total hydrocarbon emission standard.
Equip pressurized drying bleaching seals with an alarm to determine seal malfunctions.
Perform initial performance test and repeat performance tests if necessary.
Use referenced Methods in Appendix A, part 60, to determine compliance with the emission standards for lead compound (i.e., Methods 1, 2, 3, 4, and 12) and to determine compliance with the emission standards for total hydrocarbons (i.e., Methods 1, 2, 3B, 4, and 25A).

<b>Respondent Activities</b>
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install and utilize technology and systems for the purpose of 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.
Transmit, or otherwise disclose the information.

Some state regulatory agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronic reporting systems are still not widely used by the regulatory agencies. The estimated amount of electronic reporting is 10 percent.

## **5. The Information Collected: Agency Activities, Collection Methodology, and Information Management**

### **5(a) Agency Activities**

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the AIRS Facility Subsystem (AFS).

### **5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operated. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports of excess emissions are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into the 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 and annual emission inventory data for more than 100,000 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.

The records required by this regulation must be retained by the owner or operator for five years.

### **5(c) Small Entity Flexibility**

A majority of the affected facilities are small businesses. However, the impact on small entities was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown in Table 1: NESHAP for the Secondary Lead Smelter Industry (40 CFR part 63, subpart X).

## **6. Estimating the Burden and Cost of the Collection**

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The 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.

### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 16,034 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

### **6(b) Estimating Respondent Costs**



**(i) Estimating Labor Costs**

This ICR uses the following labor rates: \$89.94 per hour for Executive, Administrative, and Managerial labor; \$61.66 per hour for Technical labor, and \$38.39 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2002, Table 10. Private industry, by occupational and industry group. The rates are from column 1, Total compensation. The rate has been increased by 110 percent to account for the benefit packages available to those employed by private industry.

Managerial	\$89.94	(\$42.83 + 110%)
Technical	\$61.66	(\$29.36 + 110%)
Clerical	\$38.39	(\$18.28 + 110%)

**(ii) Estimating Capital/Startup and Operation and Maintenance Costs**

The types of industry cost associated with the information collection activities in the subject standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one time cost when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

**(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs**

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device *	(B) Startup Cost (\$) for One Affected Facility	(C) Number of New Affected Facilities to Startup	(D) Total Startup (B X C)	(E) Annual O&M Costs (\$) for One Affected Facility	(F) Number of Affected Facilities with O&M	(G) Total O&M Costs (\$) (E X F)
Temperature monitor for afterburners	1,200	0	0	0	0	\$0
Continuous particulate monitor	0	0	0	7,500	20	\$150,000

\* NOTE: Assumes that the O&M costs for temperatures monitors are negligible. Twenty of the 23 existing sources have continuous particulate monitors.

The total capital/startup costs for this ICR is zero. This is the total of column D in the above table. The total operation and maintenance (O&M) costs for this ICR are \$150,000.

The total respondent costs in blocks 14 and 15 of Part II of the OMB ROCIS form have been calculated as the addition of the capital/startup costs, and the annual operation and maintenance costs. The average annual cost for capital/startup and operation and maintenance cost to industry over the next three years of the ICR is estimated to be \$150,000. These costs are shown on the Blocks 14 and 15 of Part II of the OMB ROCIS form.

### 6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$47,309. This cost is based on the following average hourly labor rates, times a 1.6 benefits multiplication factor to account for government overhead expenses:

Managerial	\$53.22	(GS-13, Step 5, \$33.26 x 1.6)
Technical	\$39.49	(GS-12, Step 1, \$24.68 x 1.6)
Clerical	\$21.38	(GS-6, Step 3, \$13.36 x 1.6)

These rates are from the Office of Personnel Management (OPM) 2003 General Schedule which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: NESHP for the Secondary Lead Smelter Industry (40 CFR part 63, subpart X).

### 6(d) Estimating the Respondent Universe and Total Burden and Costs

Approximately 23 sources are currently subject to the regulation, and it is estimated that no additional source per year will become subject to the regulation in the next three years.

Respondent Universe and Number of Responses Per Year						
Information Collection Activity	(A) Average Number of New Respondents per Year	(B) Number of Reports for New Sources	(C) Number of Existing Respondents	(D) Number of Reports for Existing Sources	(F) Number of Respondents that keep records but do not submit reports	(E) Total Annual Responses = (AxB)+(Cx D) +F
Notification of reconstruction *	1	1	0	0	0	1
Semiannual reports	N/A	N/A	23	2	0	46
Notification of operational changes	N/A	N/A	23	1	0	23
<b>TOTAL</b>						<b>70</b>

\* NOTE: One furnace may be rebuilt over the three-year period of this ICR.

The number of total respondents is 23. This represents the number of existing sources which is 23, plus the number of new sources which is (zero) averaged over the three-year period (i.e., the total of the number of new respondents over the three-year period divided by three years). This number is shown on block 10 of Part II of the OMB ROCIS form.

The number of Total Annual Responses is 70. This is the number in column E of the Respondent Universe and Number of Responses Per Year table above.

The Total Hours Requested is shown the OMB ROCIS form in blocks 14 and 15 of Part II. The total annual labor costs are \$975,913. The annual labor costs are not shown on the OMB ROCIS form in blocks 14 and 15 of Part II. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost, NESHAP for the Secondary Lead Smelter Industry (40 CFR part 63, subpart X).

Note that the total annual capital and O&M costs to the regulated entity are \$150,000. This number is shown on the OMB ROCIS form in blocks 14 and 15 of Part II. These costs are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

#### **6(e) Bottom Line Burden Hours Burden Hours and Cost Tables**

The bottom line burden hours and cost tables for both the Agency and the respondents are attached. The annual public reporting and recordkeeping burden for this collection of information are estimated to average 229 hours per response.

#### **6(f) Reasons for Change in Burden**

There is no change in the labor hours or cost in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden.

Since there are no changes in the regulatory requirements and there is no significant industry growth, the labor hours and cost figures in the previous ICR are used in this ICR and there is no change in burden to industry.

#### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 229 hours per response. Burdens 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 are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EP-HQ-OECA-2006- 0450. An electronic version of the public docket is

available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the 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 in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 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 docket center is (202) 566-1752. 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 Number EPA-HQ-OECA-2006- 0450 and OMB Control Number 2060-0296 in any correspondence.

### **Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this information.



<b>Burden item</b>	<b>(A) Technical person- hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>	<b>(C) Technical person- hours per respondent per year (C=AxB)</b>	<b>(D) Respondents per year</b>	<b>(E) Technical person- hours per year (E=CxD)</b>	<b>(F) Management person-hours per year (Ex0.05)</b>	<b>(G) Clerical person- hours per year (Ex0.1)</b>	<b>(H) Total Cost Per Year \$<sup>a</sup></b>
E. Write report					0	0	0	\$0.00
Initial notificaton report <sup>b</sup>	3	1	3	0	0	0	0	\$0.00
Notification of reconstruction <sup>d</sup>	2	1	2	1	2	0.1	0.2	\$123.32
Notification of actual startup	2	1	2	0	0	0	0	\$0.00
Notification of SOP manuals <sup>h</sup>	8	1	8	0	0	0	0	\$0.00
Notification of performance test <sup>b</sup>	2	1	1	0	0	0	0	\$0.00
Notification of compliance test <sup>b</sup>	4	1	4	0	0	0	0	\$0.00
Report of performance test	8	1	8	0	0	0	0	\$0.00
Notification of CMS demonstration <sup>b</sup>	2	1	2	0	0	0	0	\$0.00
Semiannual reports <sup>g</sup>	16	2	32	23	736	36.8	73.6	\$51,517.05
Notification of physical/ operational changes <sup>f</sup>	8	1	8	23	184	9.2	18.4	\$12,879.27
4. Recordkeeping Requirements								
A. Read instructions	See 3A				0	0	0	\$0.00
B. Plan activities	See 3B				0	0	0	\$0.00
C. Implement activities	See 3B				0	0	0	\$0.00

<b>Burden item</b>	<b>(A) Technical person- hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>	<b>(C) Technical person- hours per respondent per year (C=AxB)</b>	<b>(D) Respondents per year</b>	<b>(E) Technical person- hours per year (E=CxD)</b>	<b>(F) Management person-hours per year (Ex0.05)</b>	<b>(G) Clerical person- hours per year (Ex0.1)</b>	<b>(H) Total Cost Per Year \$<sup>a</sup></b>
D. Develop record system	N/A							
E. Develop Record System <sup>b</sup>	3.5	52	182	23	4,186	209.3	418.6	\$293,003.25
F. Time to enter and transmit information								
Record monitoring parameters	See 4E				0	0	0	\$0.00
Record of performance tests	See 4E				0	0	0	\$0.00
Record of periodic inspections	See 4E				0	0	0	\$0.00
G. Time to train personnel	N/A				0	0	0	\$0.00
H. Time to adjust existing ways to comply with previously applicable requirements	N/A				0	0	0	\$0.00
I. Time for audits	N/A				0	0	0	\$0.00
Subtotal labor burden and cost					13,942	698	1,394	\$975,912.53
<b>TOTAL LABOR BURDEN AND COST (Rounded)</b>					16,034			\$975,913

**Assumptions:**

<sup>a</sup> Costs are based on the following hourly rates: \$89.94 per hour for Executive, Administrative, and Managerial labor; \$61.66 per hour for Technical labor, and \$38.39 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2002, ATable 10. Private industry, by occupational and industry group. © The rates are from column 1, ATotal compensation. © The rates have been increase by 110 percent to account for the benefit packages available to those employed by private industry. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

<sup>b</sup> One-time only activity. Assumes no new sources over the next three years.

<sup>c</sup> Three facilities already have continuous particulate monitors (CPM). Assumes 1 hour per week to monitor and respond to alarms.

<sup>d</sup> Since baghouses requirements are part of the normal plant operations, inspections are not attributed to this rule. We have determined that there are approximately 23 existing sources currently subject to this rule and that no new plants will be constructed over the next three years of this ICR. However, we have assumed that one furnace will be rebuilt per year over the period of this ICR.

<sup>e</sup> Sources must perform this inspection when starting-up and once per year thereafter.

<sup>f</sup> Assume that each facility will make a major adjustment once per year. In each instance, SOP must be revised.

<sup>g</sup> Sources are required to submit semiannual reports of excess emissions or no excess emissions.

<sup>h</sup> The owner or operator shall submit fugitive dust control and baghouse SOP, along with a notification requesting review and approval.



**Table 2. Annual Burden and Cost for the Federal Government:  
NESHAP for Secondary Lead Smelter Industry (40 CFR part 63, subpart X)**

<b>Activity</b>	<b>(A) EPA person- hours per occurrence</b>	<b>(B) No. of occurrences per plant per year</b>	<b>(C) EPA person- hours per plant per year (C=AxB)</b>	<b>(D) Plants per year</b>	<b>(E) Technical person- hours per year (E=CxD)</b>	<b>(F) Cost, \$ <sup>a</sup></b>
Review initial notification reports <sup>b</sup>	2	1	2	0	0	\$0.00
Review notifications of compliance status	10	1	10	0	0	\$0.00
Review quarterly summary reports	10	1	10	92	920	\$36,330.80
Review notifications of actual startups	2	1	2	0	0	\$0.00
Review notices of physical/operational changes <sup>c</sup>	4	1	4	23	92	\$3,633.08
Review notification of performance tests	4	1	4	0	0	\$0.00
Review notifications of demonstration of CMS	2	1	2	0	0	\$0.00
Review notifications of construct/reconstruction	2	1	2	1	2	\$78.98
Review and approve SOP manual	8	1	8	0	0	\$0.00
Attend initial performance tests	120	1	120	0	0	\$0.00
Attend repeat performance	120	1	120	0	0	\$0.00

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	(E) Technical person- hours per year (E=CxD)	(F) Cost, \$ <sup>a</sup>
tests						
Review annual compliance test results <sup>d</sup>	8	1	8	23	184	\$7,266.16
TOTAL LABOR BURDEN AND COST (rounded)					1,198	\$47,309.02

**Assumptions:**

<sup>a</sup> Costs are based on the hourly rate for Technical personnel of \$39.49, which has been increased by a 1.6 multiplication factor to account for government overhead expenses. This rate is obtained from the Office of Planning and Management (OPM) A2003 General Schedule@ which excludes locality rates of pay.

<sup>b</sup> We have determined that there are approximately 23 existing sources currently subject to this rule and that no new plants will be constructed over the next three years of this ICR. However, we have assumed that one furnace may be rebuilt per year over the period of this ICR.

<sup>c</sup> Assumes that each plant will make at least one major adjustment per year.

<sup>d</sup> Assume that it will take 8 hrs to review annual compliance test.