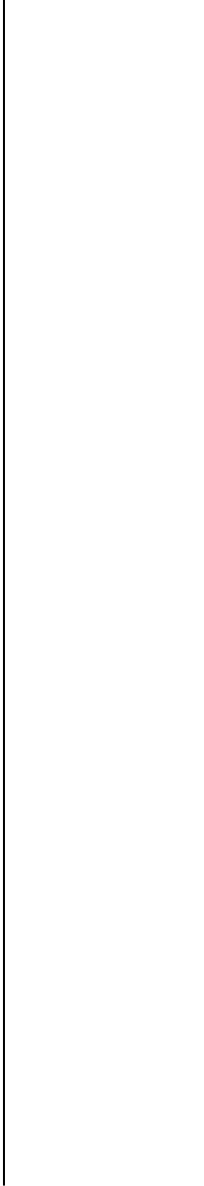


Records of Operating Parameters	0.25	250	62.5	20	1250	62.5	125	1437.5	\$116,047.50
Records of Startup, Shutdown and Malfunction	1.5	1	1.5	20	30	1.5	3	34.5	\$2,785.14
f. Train Personnel	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
g. Audits	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SUBTOTAL RECORDK.								1472	\$118,832.64
TOTAL ANNUAL BURDEN (HOURS & COST)								2,306	\$186,140.00
								(rounded)	(rounded)

Assumptions	
Number of existing plants	20
Time required to read instructions (hours)	1
Time required to complete performance test (hours)	330
Rate of failed performance tests	20%
Time required to complete Method 9 (hours)	4
Time required to record operating parameters (hours)	0.25
Number of days operating per year	250
Number of Reconstructed Facilities (per year)	1
Time required to record startups, shutdowns, malfunctions etc. (hours)	1.5
Number of startups, shutdowns, malfunctions, etc. (per year)	1
Time Required for notification preparation (hours)	2
Managerial labor rate	\$97.46
Technical labor rate	\$83.71
Clerical labor rate	\$42.55

NOTE: We are estimating that one (1) existing facility will undergo either a reconstruction or a physical or operational change such that the facility will be required to submit initial notifications and conduct an initial performance test. For the purpose of this table, we have identified the initial notification as a notification or construction/reconstruction rather than as a notification of a physical or operational change.



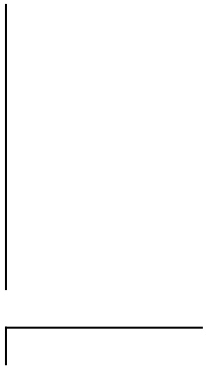


TABLE 2 AVERAGE ANNUAL EPA RESOURCE REQUIREMENT

NSPS FOR METALLIC MINERAL PROCESSING PLANTS (40 CFR PART 60, SUBPART LL)

(RENEWAL)

REPORTING/RECORDKEEPING REQUIREMENT	EPA Hours/Occurrence (A)	Occurrences/Plant/Year (B)	Total Hours/Year (C)	Plants/Year (D)	Tech Person Hours/Yr (E)	Mgt. Person Hours/Yr (F) (E x .05)	Clerical Person Hours/Yr (G) (E x 0.1)	Total Hours (H)	Total Cost/Year (I)
INITIAL PERFORMANCE TESTS									
New Facility	24	1	24	1	24	1.2	2.4	27.6	\$1,118.90
REPEAT PERFORMANCE TEST									
New Facility	24	0.2	4.8	1	4.8	0.24	0.48	5.52	\$223.78
REPORT REVIEW									
Notification of Construction/Reconstruction	2	1	2	1	2	0.1	0.2	2.3	\$93.24
Notification of Actual Startup	0.5	1	0.5	1	0.5	0.025	0.05	0.575	\$23.31
Notification of Initial Performance Test	0.5	1	0.5	1	0.5	0.025	0.05	0.575	\$23.31
Report of Performance Test	8	1	8	1	8	0.4	0.8	9.2	\$372.97
Notif. of Physical or Operational Change	2	0	0	0	0	0	0	0	\$0.00
Notification of Demonstration of CMS	0.5	1	0.5	1	0.5	0.025	0.05	0.575	\$23.31
Semi-Annual Scrubber Malfunction Report	4	2	8	20	160	8	16	184	\$7,459.36
Report of CMS Demonstration			----- Included in Report of Performance Test -----						
TOTAL ANNUAL BURDEN (HOURS & COST)								230	\$9,338
								(rounded)	(rounded)

NOTE: We are estimating that one (1) existing facility will undergo either a reconstruction or a physical or operational change such that the facility will be required to submit initial notifications and conduct an initial performance test. For the purpose of this table, we have identified the initial notification as a notification or construction/reconstruction rather than as a notification of a physical or operational change.

Assumptions	
Number of Existing plants	20
Number of reconstructed plants per	1
Rate of failed performance tests	20%
Time required to participate with performance test (per plant)	24
Time require to review construction notification (hours)	2
Time required to review startup and initial test notifications (hours)	0.5
Time required to review performance test results (hours)	8
Time required to review notification of demonstration of CMS (hours)	0.5
Time required to review semi-annual scrubber malfunction reports (hours)	4
Management Labor Rate	\$56.02
Technical Labor Rate	\$41.57
Clerical Labor Rate	\$22.50

