

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Primary Lead Smelters (40 CFR Part 63, Subpart TTT) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Primary Lead Smelters (40 CFR Part 63, Subpart TTT) (Renewal), EPA ICR Number 1856.06, OMB Control Number 2060-0414

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Primary Lead Smelters were proposed on April 17, 1998 (63 FR 19200) and promulgated on June 4, 1999 (64 FR 30204). On February 12, 1999, the Agency publicized a supplemental rulemaking for ferroalloys, mineral wool, primary copper, primary lead and wool fiberglass which enhanced the requirements for bag leak detection systems in 40 CFR 63.1625 and 40 CFR 63.1655 by including an enforceable operating limit in this rule. These standards apply to emissions sources from primary lead smelters including sinter machine, blast furnace, dross furnace, process fugitive, and fugitive dust sources. This information is being collected to assure compliance with 40 CFR part 63, subpart TTT.

The monitoring, recordkeeping, and reporting requirements outlined in these rules are similar to those required for other NESHAP regulations. Consistent with the NESHAP General Provisions (40 CFR part 63, subpart A), respondents are required to submit initial notifications, conduct performance tests, and submit periodic reports. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any period during which the monitoring system is inoperative; the production for unrefined lead, copper matte, and copper speiss; the date and times of bag leak detection system alarms and the corrective action taken; baghouse inspection and maintenance; any records required as part of the source standard operating procedures (SOP) manuals; and the compliance methods chosen. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall 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.

In the development of this Information Collection Request (ICR), we reviewed the Office of Management and Budget (OMB) "Terms of Clearance" (TOC) section on the active ICR. There were no comments in the TOC section.

Based on Agency information available on the sector, we have determined that the two respondents (i.e., primary lead smelters) currently operating in the United States are subject to the regulation, and we estimate that no additional respondents will become subject to the regulation in the next three years.

The burden to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost: NESHAP for Primary Lead Smelters (40 CFR Part 63, Subpart TTT) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors; this burden may be found in Table 2: Annual Burden and Cost for the Federal Government: NESHAP for Primary Lead Smelters (40 CFR Part 63, Subpart TTT) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

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 (HAP). 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/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 hazardous air pollutants from process sources, process fugitive, and fugitive dust sources including sinter machines and blast and dross furnaces, and organic HAP emissions from blast furnaces cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP standards were promulgated for this source category at 40 CFR part 63, subpart TTT.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations that were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard 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, leaks are being detected and repaired, and the standard is being met. The performance test may also be observed.

The required semiannual compliance certifications are used to determine periods of excess emissions, identify problems at the facility, verify operation and maintenance procedures and for compliance determinations.

3. Non-duplication, Consultations, and Other Collection Criteria

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

3(a) Non-duplication

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 its 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 (73 FR 31088) on May 30, 2008. No comments were received on the burden published in the Federal Register.

3(c) Consultations

After reviewing industry data gathered for the rule development and by the Office of Air Planning and Standards (OAQPS) for the NESHAP and the Office of Compliance during the renewal of the previous ICR, as well as consultation with OAQPS staff, we have determined that additional consultations with industry are inappropriate for this ICR renewal.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the First Federal Register Notice. In this case, no comments were received.

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 was 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 the respondents 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

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 (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 Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of primary lead smelting and refining. The Standard Industrial Classification (SIC) Code for this industry is SIC 3339, Primary Smelting and Refining of Nonferrous Metals, which under the new North American Industrial Classification System (NAICS) codes would be NAIC code 331419,

Primary Smelting and Refining of Nonferrous Metal (except Copper and Aluminum).

4(b) Information Requested

(i) Data Items

All data in this ICR that are recorded and/or reported are required by NESHAP for Primary Lead Smelters (40 CFR part 63, subpart TTT).

A source must make the following reports:

Notification Reports	
Initial notification requirements	63.9(b)(1)
Notification of compliance status when a source becomes subject to the standard	63.9(h)
Notification that source is subject to special compliance requirements, if applicable	63.9(d)
Notification of performance test	63.7(b), 63.9(e)
Rescheduled of performance test	63.7(b)(2)
Demonstration of continuous monitoring system	63.9(g)
Change in information already provided	63.9(j)
Request for an extension of compliance with relevant standard	63.9(c)

Reports	
Application for approval of the construction or reconstruction of a new major affected source, or reconstruction of a major affected source	63.5(6)(d)
Performance test results	63.10(d)(2)
Report of opacity and visible emission observations	63.9(f)
Startup, shutdown and malfunction plan	63.6(e)(3)
Periodic startup, shutdown and malfunction reports	63.10(d)(5)(i)
Notification of compliance status	63.9(h)
SOP for baghouses and fugitive dust control	63.1548(b)
Progress reports for compliance extension (if applicable)	63.6(i)
Report of annual compliance tests	63.10(d)(2)

Reports	
Semiannual reports	63.1549(e)

A source must keep the following records:

Recordkeeping	
Startup, shutdown and malfunction plan	63.6(e)(3)
All reports and notifications	63.10(b)(1)
Records of startup, shut-down, and malfunction of process equipment	63.10(b)(2)(i), (iv), (v)
Records of malfunctions of air pollution control equipment	63.10(b)(2)(ii)
Any applicability determination that demonstrates why owner or operator believes source(s) is/are unaffected	63.10(b)(3)
Records of maintenance of air pollution control equipment	63.10(b)(2)(iii)
Records of flow monitoring system performance evaluations, malfunctions, calibrations, and adjustments	63.10(b)(2)(vi), (vii), (viii), (ix), (x), (xi), 63.10(c)
Documentation required for waiver of recordkeeping or reporting requirements (if applicable)	63.10(b)(2)(xii)
Documentation of initial notifications	63.10(b)(2)(xiv)
Production records of the weight and lead content of unrefined lead, copper matte, and copper speiss	63.1549(b)(1)
Records of bag leak detection system output	63.1549(b)(2)
Records of bag leak detection system alarms and corrective actions	63.1549(b)(3)
Records of fugitive dust control activities	63.1549(b)(4)
Records of baghouse inspections and maintenance	63.1549(b)(5)
Records of doorway in-draft checks	63.1549(b)(6)
Records of flow monitoring system output (if applicable)	63.1549(b)(7)
Records of damper position checks (if applicable)	63.1549(b)(8)
Five-year retention of records	63.10(b)(1), 63.1549(b)

(ii) Respondent Activities

Respondent Activities
Read instructions.
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.

Respondent Activities
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.

Regulatory agencies, to the extent possible, are relying more on automated techniques such as electronic submissions of reports, and are improving their tracking systems and database systems to enhance the use of these techniques. 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.

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.

Agency Activities
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 Air Facility System (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 report of annual compliance tests is 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 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 headquarters and EPA regional offices. 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/operator for five years.

5(c) Small Entity Flexibility

There are no small businesses, as defined by the Small Business Administration (SBA), affected by this regulation.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Respondent Burden and Cost: NESHAP for Primary Lead Smelters (40 CFR Part 63, Subpart TTT) (Renewal).

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 12,190 hours. 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:

Managerial	\$97.46	(\$46.41 + 110%)
Technical	\$83.71	(\$39.86 + 110%)
Clerical	\$42.55	(\$20.26 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "Table 2: Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

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

The type of industry costs 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 costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/ Startup Cost (B X C)	(E) Total Annual O&M Costs for Both Respondents	(F) Total Annualized Cost
Bag Leak detection system - continuous particulate matter sensor	\$10,500	0	\$0	\$9,500	
Flow monitors with high/low alarms	\$6,500	0	\$0	\$9,500	
Total Capital Cost/Total O&M Cost			\$0	\$19,000	\$19,000

There are no capital/startup costs for this ICR. This cost is based on the assumption that both existing plants have already purchased and installed bag leak detector systems at baghouses and flow monitoring systems and recorders. The cost for monitors was provided to OAQPS by vendors. We have also assumed that no new plants will be constructed. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$19,000. This cost is based on the assumption that each baghouse will have a continuous bag leak detector and a continuous flow monitor. The O&M costs are estimated at \$500 per year per monitoring system

per baghouse. We have determined that there is a total of 19 baghouses at two existing plants (i.e. respondents) owned by the same corporation, i.e., one plant has 6 baghouses and the other plant has 13 baghouses. Therefore, the total O&M cost for each monitoring system is \$9,500 resulting in a total O&M cost of \$19,000. This is the total of column E in the above table.

The total respondent costs in block 14 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 costs to industry over the next three years of the ICR is estimated to be \$19,000. This is the total of column F in the above table.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are labor costs associated with analysis of the reported information. Respondents will bear the cost through permit fees, for daily performance tests conducted at the plant by a certified observer provided by the State enforcement agency. 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 \$2,611 (rounded). This cost is based on the average hourly labor rate as follows:

Managerial	\$56.02	(GS-13, Step 5, \$35.01 x 1.6)
Technical	\$41.57	(GS-12, Step 1, \$25.98 x 1.6)
Clerical	\$22.50	(GS-6, Step 3, \$14.06 x 1.6)

These rates are from the Office of Personnel Management (OPM) "2005 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Annual Burden and Cost to the Federal/State Government: NESHAP for Primary Lead Smelters (40 CFR Part 63, Subpart TTT) (Renewal).

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

Based on our research for the previous ICR, approximately two respondents operating in the United States, are subject to the regulation. It is estimated that no new sources per year will become subject to the standard in the next three years.

The number of respondents is calculated using the following table which addresses the three years covered by this ICR.

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records but Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	2	0	0	2
2	0	2	0	0	2
3	0	2	0	0	2
Average	0	2	0	0	2

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is two. The number of Total Annual Responses is four, as described below.

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Semiannual reports	2	2	0	4

The number of Total Annual Responses is four. The total annual labor costs are \$984,082 (rounded). Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost: NESHAP for Primary Lead Smelters (40 CFR Part 63, Subpart TTT) (Renewal), attached.

There are no annualized capital/startup and O&M costs to the regulated entities subject to the regulation. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The average annual Agency burden and cost over next three years is estimated to be 64 labor hours (rounded) at a cost of \$2,611 (rounded). See Table 2: Annual Agency Burden and Cost: NESHAP for Primary Lead Smelters (40 CFR Part 63, Subpart TTT) (Renewal), attached.

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 12,190. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost: NESHAP for Primary Lead Smelters (40 CFR Part 63, Subpart TTT) (Renewal), attached.

The total annualized capital/startup costs and O&M costs to the regulated entities are \$19,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 64 labor hours at a cost of \$2,611. See Table 2: Annual Agency Burden and Cost: NESHAP for Primary Lead Smelters (40 CFR Part 63, Subpart TTT) (Renewal), attached.

6(f) Reasons for Change in Burden

There is no change in the labor hours or cost to the respondents 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 respondents is very low, negative, or non-existent. Therefore, the labor hours and cost figures in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR. Apparent differences of less than 500 hours are attributable to rounding; in previous years, hours were rounded to the nearest thousand; this ICR presents more exact figures.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 3,048 (rounded) hours per response. 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 valid OMB Control Number. The OMB Control

Numbers for EPA's regulations are listed at 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 EPA-HQ-OECA-2008-0365. 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) 566-1927. 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-2008-0365 and OMB Control Number 2060-0414 in any correspondence.

Part B of the Supporting Statement

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

Table 1. Annual Respondent Burden and Cost: NESHAP for Primary Lead Smelters (40 CFR Part 63, Subpart TTT) (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) Cost, \$ ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Read instructions	1	1	1	0	0.0	0.0	0.0	\$0.00
B. Required activities:								
i. Initial Performance tests: ^c	8	1	8	0	0.0	0.0	0.0	\$0.00
ii. Monitoring of operations and equipment: ^d								
- Implement baghouses SOP	13.4	365	4,891	2	9,782.0	489.1	978.2	\$908,141.32
- Annual compliance stack test for lead compounds ^e	8	1	8	3	24.0	1.2	2.4	\$2,228.11
D. Gather Existing Information	Included in 4B and 5E							

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) Cost, \$ ^b
E. Write report ^{a, c}								
i. Notification of compliance status	2	1	2	0	0.0	0.0	0.0	\$0.00
ii. Notification of actual startup	2	1	2	0	0.0	0.0	0.0	\$0.00
iii. Notification of construction/ reconstruction ^a	2	1	2	0	0.0	0.0	0.0	\$0.00
iv. Notification of Performance Test	2	1	2	0	0.0	0.0	0.0	\$0.00
v. Notification of actual startup	2	1	2	0	0.0	0.0	0.0	\$0.00
vi. Reports of performance test results	4	1	4	0	0.0	0.0	0.0	\$0.00
vii. Operation and maintenance reports	10	1	10	0	0.0	0.0	0.0	\$0.00
viii. Semi-annual reports ^e	16	2	32	2	64	3.2	6.4	\$5,941.44
ix. Notification of ^f physical/operational changes	2	1	2	0	0.0	0.0	0.0	\$0.00
SUBTOTAL Reporting					9,870.00	493.50	987.00	\$916,310.87

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) Cost, \$ ^b
5. Recordkeeping Requirements								
A. Read instructions	Included in 4A							
B. Plan activities	Included in 4B							
C. Implement activities	Included in 4B							
D. Develop record system	N/A							
E. Time to enter and transmit information: - Records of operating parameters - Records of compliance inspections - Records of performance tests	1	365	365	2	730.0	36.5	73.0	\$67,771.74
F. Time to train personnel	N/A							
G. Time for audits	N/A							
SUBTOTAL Recordkeeping					730.00	36.50	73.00	\$67,771.74
TOTAL LABOR BURDEN AND COST					10,600.00	530.00	1,060.00	\$984,082.80
TOTAL LABOR HOURS					12,190.00			\$984,082.80

Assumptions:

- ^a There are an estimated two respondents which are subject to this standard. We have assumed that there will be no new net growth for this industry over the three year period of this ICR.
- ^b This ICR uses the following labor rates: \$97.46 per hour for Executive, Administrative, and Managerial labor; \$83.71 per hour for Technical labor, and \$42.55 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 2005, "Table 2: Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.
- ^c We have assumed that all sources are in compliance with initial rule requirements including initial performance test using Method 12 for lead emissions and initial sinter building in-draft compliance demonstration.
- ^d Monitoring of operations includes: 1) implementation of Standard Operating Procedures (SOP) for operation and maintenance of baghouses on a daily basis such that its bag leak detection system does not alarm more than five percent of the time in any 6-month period which we have assumed it takes about 13.4 labor hours per 24 hour day to implement the monitoring and recordkeeping requirements; 2) an annual compliance test for lead compounds; 3) and the monitoring of sinter building in-draft for which the operators are given three options to comply including: daily checks for in-draft at all doorway openings using an anemometer or equivalent device; establish and maintain the ventilation exhaust rate and damper positions at settings that result in an in-draft at each open doorway; and an alternative monitoring method.
- ^e We have assumed that sources are conducting annual compliance tests. However, upon demonstrating compliance for three consecutive years, operators will be allowed up to 24 months between compliance tests. Operators will retain the 24 month compliance test schedule as long as each subsequent test demonstrates that the facility is in compliance with the plant wide emission limit. The annual test results are submitted with the semiannual reports.
- ^f We are assuming that sources will not be changing operating parameters even when sources may purchased new equipment.

**Table 2. Annual Burden and Cost for The Federal Government:
NESHAP for Primary Lead Smelters (40 CFR Part 63, Subpart TTT) (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) Cost, \$ ^b
Initial Notifications ^c	2	1	2	0	0	0	0	\$0.00
Reports of performance test results ^c	8	3	2	0	0	0	0	\$0.00
Notification of physical or Operational changes ^c	4	1	2	0	0	0	0	\$0.00
Semi-annual reports ^d	10	2	20	2	40	2.0	4.0	\$1,864. 84
Review annual test results ^d	8	1	8	2	16	0.8	1.6	\$745.94
Subtotal Burden and Cost					56	2.8	5.6	\$2,610.78
TOTAL ANNUAL BURDEN AND COST					64.40			\$2,610.78

Assumptions:

^a We have assumed that there are approximately two respondents currently operating in the United States. It is estimated that no additional respondents will become subject to the regulation in the next three years based on information available on the sector.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$56.02 (GS-13, Step 5, \$35.01 x 1.6), Technical rate of \$41.57 (GS-12, Step 1, \$25.98 x 1.6), and Clerical rate of \$22.50 (GS-6, Step 3, \$14.06 x 1.6). These rates are from the Office of Personnel Management (OPM) “2005 General Schedule” which excludes locality rates of pay.

^c We have assumed that all existing sources are in compliance with the initial rule requirements.

^d Although the semi-annual reports will include the annual stack test results, we have accounted its burden separately since it will only occur once a year.