

**SUPPORTING STATEMENT FOR
EPA RENEWAL OF INFORMATION COLLECTION
REQUEST (ICR) FOR
EPA'S VOLUNTARY ALUMINUM INDUSTRIAL PARTNERSHIP
EPA ICR NUMBER 1867.04, OMB CONTROL NUMBER 2060-0411**

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

This ICR is entitled "Reporting Requirements Under EPA's Voluntary Aluminum Industrial Partnership (VAIP)," ICR number 1867.04.

1(b) Characterization of the Information Collection

VAIP is an EPA-sponsored, voluntary program that encourages primary aluminum producers to adopt cost effective methods for reducing emissions of perfluorocarbon (PFC) and direct CO₂ from carbon anode consumption. It is administered through EPA's Climate Change Division (CCD). VAIP Partners agree to implement technically feasible and cost effective management and technological upgrades.

Participation in the program begins with the completion and submittal to EPA of a Memorandum of Understanding (MOU) that outlines responsibilities of the VAIP Partner and EPA. VAIP Partners have committed to a PFC and direct CO₂ emissions reduction goal and track other process elements that are determined on a company-specific basis. The program was initiated in 1995 with an emission reduction goal of reducing PFC emissions 40 percent from 1990 levels by the year 2000. This goal was achieved and the program has been extended to 2010 and expanded to incorporate PFCs plus direct CO₂ emissions from the carbon anode.

VAIP Partners also agree to submit to EPA an annual Tracking Report that documents annual emission inventories and other relevant data. Partners also are encouraged to publicize their membership for the enhancement and acceptance of the program, and EPA aids in the generation of that publicity. EPA and the Partners agree to pursue a better understanding of the process through which PFCs are generated. This agreement can be terminated by the VAIP Partner or EPA without notice or penalties.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

EPA's Voluntary Aluminum Industrial Partnership (VAIP) was initiated in 1995 and is an important voluntary program contributing to the overall reduction in emissions of greenhouse gases. This program focuses on reducing direct carbon (perfluorocarbon (PFC) and direct¹ CO₂) emission from the production of primary aluminum. Seven of the eight U.S. producers of primary aluminum participate in this program. PFCs are very potent greenhouse gases with global warming potentials several thousand times that of carbon dioxide and they persist in the atmosphere for thousands of years. EPA has developed this ICR to renew authorization to

¹ Indirect CO₂ emissions result from energy consumption versus direct emissions which result from the production process.

collect information from companies in the VAIP. Participants voluntarily agree to the following: designating a VAIP liaison; undertaking technically feasible and cost-effective actions to reduce PFC emissions; and reporting to EPA, on an annual basis, the PFC emissions or production parameters use to estimate emissions. The information contained in the annual reports of VAIP members is used by EPA to assess the success of the program in achieving its goals. The information contained in the annual reports may be considered confidential business information and is maintained as such. EPA has developed this ICR to obtain authorization to collect information from VAIP Partners and to ensure the Partners are meeting company-specific goals.

EPA needs to collect initial information in the MOU to formally establish participation in the VAIP, to document the Partner's company-specific PFC emissions reduction goal, and to obtain general information. By agreeing to participate in the VAIP, the Partner agrees to the terms of various information collections specified by EPA in the MOU. All participating companies have signed an MOU.

EPA needs to collect information in the Tracking Report to evaluate a Partner's progress and performance, and assess overall program results. The information provided in the Tracking Report also allows EPA to further its research of the methods for measuring PFCs, the relationship between PFC generation and process and design variables, and the development of emission factors for PFCs. By agreeing to participate in the VAIP, the Partner agrees to complete and submit an annual Tracking Report.

2(b) Practical Utility/Users of the Data

EPA uses information submitted to characterize the operations at each smelter and establish each Partner's baseline emission levels in its data base containing information on VAIP Partners. The data base serves as a source of general information and a mailing list. EPA uses information submitted in the Tracking Report to monitor the progress of Partners in reducing emissions. EPA enters report information into a Tracking System. EPA also uses the information to provide technical and other assistance, where appropriate.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

The information to be obtained under this ICR has not been collected by EPA or any other Federal agency, nor is it available from any other source.

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

In compliance with the Paperwork Reduction Act of 1995, EPA solicited public comments on the ICR through an announcement in the Federal Register (73 FR 76636, December 17, 2008). The comment period closed on February 17, 2009. No comments were received.

3(c) Consultations

EPA consulted with the seven VAIP participating companies to obtain their views on this method of data collection and obtained their input on the burden estimate. Member companies are:

- Alcan Primary Metals Group;
- Alcoa Inc.;
- Century Aluminum of Kentucky;
- Century Aluminum of West Virginia;
- Columbia Falls Aluminum Company;
- Noranda Aluminum; and
- Northwest Goldendale Aluminum.

3(d) Effects of Less Frequent Collection

Partners must prepare and submit an annual Tracking Report while participating in the program. EPA believes that any reduction in the frequency of this information collection would impede efforts by EPA to evaluate results of the program.

3(e) General Guidelines

This information collection request was prepared in compliance with OMB's implementing regulations and EPA's guidelines for ICRs.

3(f) Confidentiality

Participation in the VAIP is voluntary. VAIP Partners may designate information submitted under this ICR as confidential business information. EPA will treat all such information as confidential business information and will not make the company or agency-specific information collected under this ICR available to the general public in accordance with the Clean Air Act.

3(g) Sensitive Questions

No questions of a sensitive nature are asked in the MOU or the Tracking Report.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/SIC Codes

The following is a list of Standard Industrial Classification (SIC) codes and associated industries that may be affected by information collection requirements covered under this ICR:

3334 Primary Production of Aluminum

4(b) Information Requested

EPA's VAIP specifies some requirements for all Partners and works with each company to establish a company-specific Partner Program. All VAIP Partners must develop and submit an MOU with the Agency upon agreeing to participate in the program. Partners also submit a Tracking Report to the Agency. The Tracking Report documents what has been accomplished in the past year, based on the established, company-specific Partner Program, using the company's goal, baseline emissions, and previous Tracking Reports as guidelines for comparison. The Partners also conduct additional activities as needed, which includes a meeting of Partners and EPA approximately once per year.

Memorandum of Understanding

VAIP Partners are required to submit to EPA an MOU that describes the terms of participation in the program.

(i) Respondent data items:

- The name, title, address, and telephone and facsimile number of a VAIP Liaison;
- The name, address, and telephone number of the Partner's CEO, President, or Chairman, if applicable; and
- The details of the company-specific PFC reduction program, which may address:
 - PFC emissions;
 - Anode effect frequency;
 - Anode effect duration; and
 - An established relationship between anode effect behavior and PFC emissions.

(ii) Respondent MOU activities:

In finalizing the MOU, Partners must perform the following activities:

- Review and complete the MOU; and
- Sign and submit it to EPA.

Tracking Report

Partners must complete and submit a VAIP Tracking Report annually while participating in the program.

(i) Data items:

The Partner must submit the following information in the Tracking Report:

- PFC and direct CO₂ emissions data;
- The corresponding relevant, non-proprietary process and cell design parameter information; and
- Other information as specified in the company's Partner Program.

(ii) Respondent activities:

Partners must conduct the following activities in preparing the Tracking Report:

- Review the requirements and previous report(s);
- Gather the requested data and other information for the report;
- Complete the report; and
- Sign and submit the report to EPA.

Additional Activities

During participation in the program, Partners may be requested to participate in meetings or review partnership materials or analysis, and are required to notify EPA of any change in MOU status, such as a change in VAIP Liaison.

- (i) Data items:
 - Participate in meeting of VAIP Partners and EPA representatives; and
 - Provide EPA with new information, or revisions to historical data.
- (ii) Respondent activities:
 - Participate in meeting of Partners and EPA; and
 - Notify EPA of any process changes, such as the VAIP Liaison.

5. THE INFORMATION COLLECTED--AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

The VAIP requires EPA to perform activities after a Partner submits the MOU and Tracking Report.

Memorandum of Understanding

EPA must perform the following activities following the submittal of an MOU:

- Review the MOU to ensure completeness and accuracy, and follow up, if necessary;
- Sign the MOU;
- Send cover letter and original MOU back to Partner;
- File copies of cover letters and MOUs; and
- Enter MOU information into a database.

Tracking Report

EPA must perform the following activities after the submittal of a Tracking Report:

- Review the report to ensure completeness and accuracy, and follow-up, if necessary;
- Enter information into the Tracking System; and
- File copies of the report

Additional Activities

EPA also may be required to perform the following additional activities:

- Participate in meetings with VAIP Partners representatives (generally conference calls or held in Washington, D.C.); and
- Enter any changes in Partner's information, such as the name of a new VAIP Liaison, into a database.

5(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA uses a state-of-the-art telephone system, personal computers, and applicable database and modeling software. EPA will ensure the accuracy and completeness of collected information by reviewing each submittal. EPA will enter the information obtained from the MOU and Tracking Reports into a database and Tracking System, and will monitor the progress of Partners in reducing PFCs.

5(c) Small Entity Flexibility

EPA expects that one or more VAIP Partners will be small entities (having fewer than 1,000 employees). EPA has designed its program to minimize respondent burden while obtaining sufficient and accurate information. In addition, the burden associated with the VAIP is inherently reduced since the initial agreement to participate is voluntary.

5(d) Collection Schedule

EPA collects initial information in the MOU, which is completed and submitted by each Partner upon agreement to participate in the program. EPA collects information annually in the Tracking Report to monitor emission reduction progress. Finally, EPA may collect other program information on a periodic basis or as the information is submitted; these items include notification of changes in VAIP Liaison and notification of changes in a Partner's operations.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

In order to obtain accurate hourly burden and cost estimates, EPA consulted all seven of the participating companies and received no comments. Exhibit 1 presents the estimated annual respondent burden for information collection activities associated with the VAIP.

Tracking Report

All seven participating companies must complete and submit a Tracking Report annually. Most of the costs for respondents (labor) are associated with this activity.

Additional Activities

It is anticipated that each Partner will travel to no more than one meeting per year at an estimated cost of \$1,000 for each respondent per trip. EPA also expects that some additional information submittals may be required of some Partners. EPA's experience with other voluntary programs indicates that approximately 10 percent of all Partners experience a change, such as in their VAIP Liaison, each year. Thus, EPA estimates that one Partner ($7 \times .1 = 0.7$) will notify EPA of a change annually.

6(e) Bottom Line Burden Hours and Costs

Exhibits 1 and 2 show the aggregate annual burden and cost to respondents and the government, respectively, for the information collection activities covered under this ICR. The bottom line burden for respondents collectively is approximately 633 hours per year with an annual cost of approximately \$47,054. Almost all of the costs for respondents are associated with tracking report activities or participating in an annual meeting. The annual bottom line burden to the Agency is approximately 65 hours, at a cost of approximately \$3,942 per year.

6(f) Reasons for Change in Burden

- The number of partnership meetings have decreased and the use of teleconferencing has increased.
- EPA labor rates were re-estimated using 2008 salaries for the locality pay area of Washington-Baltimore-Northern Virginia.
- An electronic reporting form was developed through the partnership and is used by 7 of the 7 respondents. The form simplifies the reporting process and participants, having gained experience over the past nine years collecting the data and using the form, are now very familiar with the data collection and reporting requirements.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 90 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 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 EPA-HQ-OAR-2003-0034, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Avenue, NW, Washington, D.C. 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 and Radiation Docket is (202) 566-1742. An electronic version of the public docket is available at 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, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2003-0034 and OMB Control Number 2060-0411 in any correspondence.

EXHIBIT 1
2009 ESTIMATED ANNUAL RESPONDENT [COMPANY] BURDEN AND COST

Respondent Hours and Costs Estimates

INFORMATION COLLECTION ACTIVITY	Leg. hours/ Year	Mgr. hours/ Year	Tech. hours/ Year	Cler. hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O & M Cost	Total Hours (Annual)
Memorandum of Understanding - (1 time cost)								
Review MOU	0.0	0.0	0.0	0.0	\$0	\$0	\$0	
Gather information and complete the MOU	0.0	0.0	0.0	0.0	\$0	\$0	\$0	
Sign and submit MOU to EPA	0.0	0.0	0.0	0.0	\$0	\$0	\$0	
MOU SUBTOTAL (94.5 hours)	0.0	0.0	0.0	0.0	\$0	\$0	\$0	0
Annual Tracking Report (Information Collection)*								
Review the requirements and previous report(s)	0.0	1.5	0.7	0.0	\$165	\$0	\$0	
Gather the requested data and other information	0.0	23.2	43.5	0.0	\$4,878	\$0	\$0	
Complete the report	0.0	11.6	0.0	0.0	\$916	\$0	\$0	
Sign and submit report to EPA	0.0	0.7	0.0	0.7	\$91	\$0	\$0	
Annual Reporting SUBTOTAL	0.0	37.0	44.2	0.7	\$6,050	\$0	\$0	81.9
Additional Activities**								
Participate in meetings and activities of VAIP Partnership	0.0	8.0	0.0	0.0	\$632	\$0	\$0	
Provide EPA with new information	0.0	0.5	0.0	0.0	\$40	\$0	\$0	
Annual Activities SUBTOTAL	0.0	8.5	0.0	0.0	\$672	\$0	\$0	8.5
ANNUAL TOTAL PER RESPONDENT					\$6,722	\$0	\$0	90.4

TOTAL TRACKING BURDEN FOR 7 RESPONDENTS \$42,350 573.5
PROGRAM TOTAL BURDEN FOR 7 RESPONDENTS \$47,054 633.0

*Labor is the major cost associated with Tracking Reports. No "Startup" or "O&M" costs since these systems are already in place and used for production process and cost analysis by the respondent.

**Additional Activities include annual partnership meeting.

EXHIBIT 2

2009 ESTIMATED ANNUAL AGENCY [EPA] BURDEN AND COST

Hours and Costs to the Agency

INFORMATION COLLECTION ACTIVITY	Leg. hours/ Year	Mgr. hours/ Year	Tech. hours/ Year	Cler. hours/ Year	Labor Cost/ Year	Capital/ Startup Cost	O &M Cost	Total Hours (Annual)
Memorandum of Understanding								
Review MOU and follow up, if necessary	0.0	0.0	0.0	0.0	\$0	\$0	\$0	
Sign the MOU	0.0	0.0	0.0	0.0	\$0	\$0	\$0	
Develop a cover letter	0.0	0.0	0.0	0.0	\$0	\$0	\$0	
Send cover letter and original MOU back to Partner	0.0	0.0	0.0	0.0	\$0	\$0	\$0	
File copies of cover letter and MOU	0.0	0.0	0.0	0.0	\$0	\$0	\$0	
Enter MOU information into a data base	0.0	0.0	0.0	0.0	\$0	\$0	\$0	
SUBTOTAL	0.0	0.0	0.0	0.0	\$0	\$0	\$0	0.0
Tracking Report								
Review data and follow up, if necessary	0.0	11.5	7.0	3.0	\$1,504	\$0	\$0	
Make copies of data	0.0	0.0	1.0	4.5	\$228	\$0	\$0	
File copies of data	0.0	0.0	4.0	4.0	\$392	\$0	\$0	
Enter information into data base	0.0	4.0	6.0	4.0	\$632	\$0	\$0	
SUBTOTAL	0.0	15.5	18.0	15.5	\$2,756	\$0	\$0	49.0
Additional Activities								
Participate in meetings and activities of Partnership	0.0	10.0	2.0	1.0	\$999	\$0	\$0	
Enter changes in Partner's information into database	0.0	0.0	2.0	1.0	\$187	\$0	\$0	
SUBTOTAL	0.0	10.0	4.0	2.0	\$1,186	\$0	\$0	16.0
TOTAL					\$3,942	\$0	\$0	65.0