SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP FOR AREA SOURCES: POLYVINYL CHLORIDE AND COPOLYMER PRODUCTION, PRIMARY COPPER SMELTING, SECONDARY COPPER SMELTING, AND PRIMARY NONFERROUS METALS—ZINC, CADMIUM, AND BERYLLIUM (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (Renewal)

1(b) Short Characterization/Abstract

This Information Collection Request (ICR) covers information collection requirements in the final area source rules for primary copper smelting (40 CFR part 63, subpart EEEEEE), secondary copper smelting (40 CFR part 63, subpart FFFFFF), and primary zinc production facilities (part of the primary nonferrous metals category) in sections 63.11162 through 63.11164 of 40 CFR part 63, subpart GGGGGG. Control of zinc and beryllium under subpart GGGGGG also results in the control of cadmium which is a by-product of the production process. There are no existing or new secondary copper smelters in the United States (U.S.). The final area source rules for polyvinyl chloride and copolymer production in 40 CFR part 63, subpart DDDDDD and primary beryllium production facilities (part of the primary nonferrous metals category) in sections 63.11165 and 63.11166 of 40 CFR part 63, subpart GGGGGG do not impose any new information collection burden. New and existing polyvinyl chloride and copolymer plants that are area sources are required to comply with the same testing, monitoring, recordkeeping, and reporting requirements as those in the National Emission Standard for Vinyl Chloride (40 CFR part 61, subpart F). The Office of Management and Budget (OMB) has previously approved the information collection requirements in 40 CFR part 61, subpart F (OMB control number 2060-0071, EPA ICR number 0186.10). New and existing primary beryllium production facilities that are area sources are required to comply with the same testing, monitoring, recordkeeping, and reporting requirements as those in the National Emission Standard for Beryllium (40 CFR part 61, subpart C). OMB has previously approved the information collection requirements in 40 CFR part 61, subpart C (OMB control number 2060-0092, EPA ICR number 0193.08).

Potential respondents are owners or operators of a new or existing primary copper smelter, a new secondary copper smelter, or a new or existing primary zinc production facility that is an area source of hazardous air pollutants (HAP) emissions. For existing facilities, the NESHAP adopt the same emissions limits, work practice standards, and compliance provisions that are currently required in the facility's Title V permits for the control of particulate matter (PM). Existing primary copper smelting area sources are subject to PM emissions limits; compliance requirements include a compliance demonstration, monthly monitoring reports,

reports of deviations, semiannual monitoring reports, and recordkeeping requirements. Existing primary zinc production facilities are subject to equipment/work practice standards for the control of roaster exhaust gases and PM emissions limits for different types of furnaces. Compliance provisions include baghouse monitoring and maintenance requirements, reports of deviations, semiannual monitoring reports, and recordkeeping requirements. The NESHAP also requires repeat PM performance tests for regulated emissions sources. Any sintering machine at a primary zinc production area source is subject to the PM and opacity limits in the New Source Performance Standard (NSPS) for primary zinc smelters (40 CFR part 60, subpart Q) and associated monitoring requirements. The NSPS requires a continuous opacity monitoring system (COMS) for sintering machines.

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

New and existing area sources are subject to requirements in the General Provisions (40 CFR part 63, subpart A). An existing affected source is required to submit an initial notification of applicability and a notification of compliance status. The owner or operator of an existing affected source may certify initial compliance with PM limits based on previous performance test results; performance tests are required to demonstrate initial compliance for a new affected source. All requirements in the General Provisions apply to the owner or operator of a new affected source.

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

Any owner and 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.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

We have determined that there are an estimated five respondents currently subject to this rule. Of the five facilities, three are primary copper smelters and two are primary zinc smelters. It is estimated that no additional respondents per year will become subject to the standard over the three-year period of this ICR.

In the previous ICR, two Information Collection (IC) are shown, which indicates two different affected publics. In fact, there is one affected public involving two different CFR citations. In this ICR, we have combined the CFR citations. Therefore, only one IC is needed.

None of the facilities in the United States are owned by state, local, tribal or the Federal government. They are all privately, owned for-profit businesses. The burden to the "Affected Public" is listed below in Table 1: Annual Respondent Burden and Cost - NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (Renewal). The Federal government burden associated with the review of reports submitted by the respondent is shown below in Table 2: Average Annual EPA Burden - NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (Renewal).

There are no "Terms of Clearance" associated with this ICR.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

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

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

Facilities in these source categories are currently well controlled as a result of state and national standards and permitting requirements for criteria pollutants that obtain co-control of HAP. Therefore, we have developed the final standards to reflect the application of GACT. Except for new secondary copper smelters, GACT is equivalent to the levels of control that are currently required for these sources.

Certain records and reports are necessary for the Administrator to confirm the compliance status of area sources, identify any new or reconstructed sources subject to the standards, and confirm that the GACT standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the CAA (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions. The recordkeeping and reporting requirements for Title V permits are contained in 40 CFR 70.6 and 40 CFR 71.6. Under parts 63 and 70 or 71, the owner or operator must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

2(b) Practical Utility/Users of the Data

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

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

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 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 (74 FR 32580) on July 8, 2009. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is

operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. We contacted the American Zinc Association at (202) 367-1151, and the International Copper Association, Limited, at (212) 251-7240.

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.

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 emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

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. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond the five years. Without the five-year record retention, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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/NAIC Codes

Potential respondents under subpart EEEEEE are owners or operators of new and existing primary copper smelters that are area sources of HAP. The North American Industry Classification System (NAICS) code for primary copper smelters is 331411. We estimate that three primary copper smelters are subject to the NESHAP; no new area sources are projected during the 3-year period of this ICR.

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

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

4(b) Information Requested

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

(i) Data Items

Data Items, Including Recordkeeping Requirements:

Attachments 1A and 1B, Source Data and Information Requirements summarize the data items, including recordkeeping and reporting requirements.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Perform initial performance test and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.

Respondent Activities
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.

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., continuous parameter monitoring system). Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

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, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the OTIS.

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 operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs.

Information contained in the reports is entered into OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection,

maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. EPA 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

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) 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 to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden - NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (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. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

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 46 (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:

Managerial	$114.77 ($54.65 + 110%)
Technical	$97.59 ($46.47 + 110%)
Clerical	$48.26 ($22.98 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2009, Table 2. Civilian Workers, by occupational and industry group. The rates are from column 1, Total compensation. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

The only type of industry costs associated with the information collection activity in the regulations is labor costs. There are no capital/startup or operation and maintenance costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA 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 $613.

This cost is based on the average hourly labor rate as follows:

Managerial	$61.36 (GS-13, Step 5, $38.35 + 60%)
Technical	$45.52 (GS-12, Step 1, $28.45 + 60%)
Clerical	$24.64 (GS-6, Step 3, $15.40 + 60%)

These rates are from the Office of Personnel Management (OPM) 2009 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden - NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately five existing respondents will be subject to the standard. Of the five, three are primary copper smelters and two are primary zinc smelters. It is estimated that no additional respondents per year will become subject to the standard over the three-year period of this ICR. However, two respondents per year will effect process changes that necessitate initial applicability and

compliance status reports.

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

Number of Respondents					
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	2	5	0	2	5
2	2	5	0	2	5
3	2	5	0	2	5
Average	2	5	0	2	5

[1] New respondents include sources with constructed or reconstructed 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 5.

The total number of annual responses per year is calculated using the following table:

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
Write Report				
Monitor per Title V permit	5	0	0	0
Notification of initial applicability	2	1	0	2
Initial/repeat performance tests	5	0	0	0
Notification of initial compliance status	2	1	0	2
Reports per Title V permit	5	0	0	0
Total Number of Annual Responses			Total	4

The number of Total Annual Responses is 4.

The total annual labor costs are $4,326. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (Renewal).

6(e) Bottom Line Burden Hours 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 $4,326. Details regarding these estimates may be found below in Table1. Annual Respondent Burden and Cost – NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 12 hours (rounded) per response.

The total annual capital/startup and Operation and Maintenance (O&M) costs to the regulated entity are zero.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 14 labor hours at a cost of $613. See below Table 2: Annual Agency Burden and Cost – NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (Renewal).

6(f) Reasons for Change in Burden

There is a change in this ICR as compared to the previous one. In this ICR we have accounted for all of the five sources as compared to the previous ICR. There are no new sources and are not anticipated to change over the next three year; the growth rate for the industry is very low, negative or nonexistent, thus, there is no significant change in the overall number of sources. One other reason for the change in the cost burden was because of an increase in the hourly labor rates.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 12 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; to 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; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of information; to search data sources; to complete and review the collection of information; and to 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-2009-0378. 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 content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search” than 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 Avenue, N.W., 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 Enforcement and Compliance Docket and Information Center Docket 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, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0378 and OMB Control Number 2060-0596 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 Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (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) Total Cost Per year [b]
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
a. Read instructions [d]	8	1	8	2	16	0.8	1.6	$
b. Required activities								
Monitor per Title V permit [c]	2	1	2	0	0	0	0	$1,730.48
Initial/repeat performance tests [e]	4	1	4	0	0	0	0	$0
Initial notification of applicability	4	1	4	2	8	0.4	0.8	$865.24
Initial notification of compliance status [f]	8	1	8	2	16	0.8	1.6	$1,730.48
Reports per Title V permit [c]	2	1	2	0	0	0	0	$0
c. Create information	See 3B							
d. Gather existing information	See 3B							
e. Write report	See 3B							
Subtotal for Reporting Requirements						46		
4 Recordkeeping requirements								
a. Read instructions	See 3A							
b. Plan activities	See 3A							
c. Implement activities	See 3A							
d. Record all data required by Title V permit [c]	0.25	1	0.25	0	0	0	0	$0
e. Time to transmit or disclose information [c]	0.25	1	0.25	0	0	0	0	$0
f. Time to train personnel	4	1	4	0	0	0	0	$0
g. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						0		
					40	2	4	$4,326.20
TOTAL LABOR BURDEN AND COST (rounded)						46		$4,326

Assumptions:

[a] We have assumed that the average number of respondents potentially subject to this rule is five. Each year two respondents are anticipated to effect process changes requiring notification to the Agency regarding applicability and compliance status. There will be no additional new sources over the three-year period of this ICR.

[b] This ICR uses the following labor rates: $114.77 per hour for Executive, Administrative, and Managerial labor; $97.59 per hour for Technical labor, and $48.26 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March, 2009, Table 2. Civilian Workers, by occupational and industry group. The rates are from column 1, Total compensation. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

[c] We have assumed that no hours or costs are associated with this burden item because existing plants are already complying with the requirement in their Title V operating permit.

[d] We have assumed that it will take eight hours for each respondent to read instructions..

[e] We have assumed that an existing facility may certify initial compliance based on previous PM test; no new test is required.

[f] We have assumed that it will take eight hours for each respondent to complete the initial notification of compliance status report.

Table 2: Average Annual EPA Burden - NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary

Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (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]
Report review								
Initial notification of applicability [c]	2	1	2	2	4	0.2	0.4	$204.21
Initial notification of compliance status [c]	4	1	4	2	8	0.4	0.8	$408.41
Subtotals Labor Burden and cost					12	0.6	1.2	$612.62
TOTAL ANNUAL BURDEN AND COST (rounded)						13.8 14 (rounded)		$613

Assumptions:

[a] We have assumed that the average number of respondents potentially subject to this rule will be five. Each year two respondents are anticipated to effect process changes requiring notification to the Agency regarding applicability and compliance status. They are all area sources. There will be no additional new sources over the three-year period of this ICR.

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: $61.36 Managerial rate (GS-13, Step 5, $38.35 x 1.6), $45.52 Technical rate (GS-12, Step 1, $28.45 x 1.6), and $24.64 Clerical rate (GS-6, Step 3, $15.40 x 1.6). These rates are from the Office of Personnel Management (OPM) 2009 General Schedule, which excludes locality rates of pay.

[c] We have assumed that it will take each respondent 2 hours to review the initial notification of applicability report.

[d] We have assumed that it will take each respondent 4 hours to review the initial notification of compliance status report.

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

Requirement	Citation for Existing Sources	Citation for New Sources	General Provisions Citation
Monitoring			
Continuous PM sampler and calculations of daily average emissions or COMS or BLDS (for existing sources) or PM CEMS and calculations of daily average emissions (new sources)	§§63.11147(b), 63.11148(c), (d)	§63.11149(b), (c)	NA
Notifications			
Notification of applicability	Table 1 to subpart EEEEEE	Table 1 to subpart EEEEEE	40 CFR 63.9(a)(2)
Notification of construction/ reconstruction	NA	Table 1 to subpart EEEEEE	40 CFR 63.9(b)(5)
Notification of special compliance requirements	NA	Table 1 to subpart EEEEEE	40 CFR 63.9(d)
Notification of performance test	NA	Table 1 to subpart EEEEEE	40 CFR 63.9(c)
Notification of opacity/VE observations	NA	Table 1 to subpart EEEEEE	40 CFR 63.9(f)
Additional CMS notifications	NA	Table 1 to subpart EEEEEE	40 CFR 63.9(g)
Notification of compliance status	Table 1 to subpart EEEEE/ §63.11150(b), (c)	Table 1 to subpart EEEEEE/ §63.11150(b)	40 CFR 63.9(h)
Notification of changes in information	Table 1 to subpart EEEEE	Table 1 to subpart EEEEEE	40 CFR 63.9(j)
Plans			
SSM plan	NA	Table 1 to subpart EEEEEE	40 CFR 63.6(e)(3)
Performance test plan	NA	Table 1 to subpart EEEEEE	40 CFR 63.7(c)(2)
CMS quality control plan	NA	Table 1 to subpart EEEEEE	40 CFR 63.8(d)
CMS performance evaluation test plan	NA	Table 1 to subpart EEEEEE	40 CFR 63.8(e)(3)
Records			
Information to demonstrate compliance	§§63.11147(b), 63.11148(b), (c), (f), (g)	Table 1 to subpart EEEEE/ §63.11149(c)	40 CFR 63.10
Reports			

Requirement	Citation for Existing Sources	Citation for New Sources	General Provisions Citation
Monthly emissions summary or quarterly report	§§63.11147(b), 63.11148(b)	NA	NA
Emergency report	§§63.11147(b), 63.11148(f)	NA	NA
Initial performance test	§§63.11147(b), 63.11148(e)	§63.11149(c)	40 CFR 63.7(e)(1)
Quality assurance test plan	NA	Table 1 to subpart EEEEEE	40 CFR 63.7(c)
CMS performance evaluations/report	NA	§63.11149(b)	40 CFR 63.8(e)(5)
SSM reports	NA	Table 1 to subpart EEEEEE	40 CFR 63.6(e)(3)
Excess emissions reports	NA	Table 1 to subpart EEEEEE	40 CFR 63.10(e)(3)

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

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

Requirement	Citation for Existing Sources	Citation for New Sources	General Provisions Citation
Quality assurance test plan	NA	Table 1 to subpart GGGGGG	40 CFR 63.7(c)
CMS performance evaluation/report	NA	Table 1 to subpart GGGGGG	40 CFR 63.8(e)(5)
SSM reports	NA	Table 1 to subpart GGGGGG	40 CFR 63.6(e)(3)
Excess emissions reports	NA	Table 1 to subpart GGGGGG	40 CFR 63.10(e)(3)