

**Table 1: Annual Respondent Burden and Cost - NSPS for Lead Acid Battery Manufacturing (40 CFR part 60, subpart KK)**

**(Renewal)**

REPORTING/RECORDKEEPING REQUIREMENT	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year	(E) Technical Hours per Year @ \$98.20 (E=C x D) <sup>b</sup>	(F) Management Hours per Year @ \$114.49 (F= E x 0.05) <sup>b</sup>	(G) Clerical Hours per Year @ \$48.53 (G= E x 0.1) <sup>b</sup>	Total Labor Costs per Year
1. APPLICATIONS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2. SURVEY AND STUDIES	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3. REPORTING REQUIREMENTS								
A. Read Instructions	-----Included in 3B-----							
B. Required Activities								
New Sources <sup>a</sup>								
Initial performance test	20.87	1	20.87	0	0.00	0.00	0.00	\$0.00
Reference Method 9 <sup>c</sup>								
Reference Method 12 <sup>d</sup>								
Other method approved by Administrator								
Repeat of performance test <sup>e</sup>	20.87	1	20.87	0	0.00	0.00	0.00	\$0.00
New and Existing Sources								
Monitoring of emissions and operations <sup>f</sup>	-----Included in 4E-----							
C. Create Information	-----Included in 3B-----							
D. Gather Existing Information	-----Included in 3E-----							
E. Write Report								
New Sources								
Notification of construction/reconstruction/modification	1.74	1	1.74	0	0.00	0.00	0.00	\$0.00
Notification of initial startup	1.74	1	1.74	0	0.00	0.00	0.00	\$0.00
Notification of CMS demonstration	1.74	1	1.74	0	0.00	0.00	0.00	\$0.00
Notification of initial performance test	1.74	1	1.74	0	0.00	0.00	0.00	\$0.00
Report of performance test	-----Included in 3B-----							
New and Existing Sources								
Semi-annual Reports <sup>g</sup>	13.91	2	27.83	13	361.74	18.09	36.17	\$39,349.07
Process Change	1.74	2	3.48	0	0.00	0.00	0.00	\$0.00
	Total Reporting Hours by Labor Category				362	18	36	
<b>TOTAL REPORTING BURDEN</b>						<b>416</b>	<b>Hours</b>	<b>\$39,349</b>
4. RECORDKEEPING REQUIREMENTS								
A. Read Instructions	-----Included in 3A-----							
B. Plan Activities	-----Included in 4E-----							
C. Implement Activities	-----Included in 4E-----							
D. Develop Record System	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
E. Time to Enter Information								
Records of monitoring of emissions and operations	0.65	365	238.04	13	3094.56	154.73	309.46	\$336,618.98
Records of startups, shutdowns, malfunctions, etc.	1.30	1	1.30	52	67.83	3.39	6.78	\$7,377.95
F. Train Personnel	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
G. Audits	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Total Recordkeeping Hours by Labor Category				3,162	158	316	
<b>TOTAL RECORDKEEPING BURDEN</b>						<b>3,637</b>	<b>Hours</b>	<b>\$343,997</b>
<b>TOTAL ANNUAL BURDEN</b>						<b>4,053</b>	<b>Hours</b>	<b>\$383,346</b>

**Assumptions:**

- a. We have assumed that there are approximately 52 sources currently subject to NSPS, subpart KK. We have assumed that there will be no new sources over the period of this ICR. Therefore, the average number of respondents per year is estimated to be 52.
- b. The labor rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2009, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rate has been increased by 110% to account for the benefit packages available to those employed by private industry.
- c. All sources are required to use Method 9 for opacity observations, except for lead oxide manufacturing facilities.
- d. All respondents would have to perform Method 12 to calculate the lead concentration and the volumetric flow rate of the effluent gases. It requires at least three runs of 60 minutes and 0.85 dscm.
- e. We have assumed that 20 percent of initial performance tests must be repeated due to failure.
- f. Monitoring of emissions and operations requirements includes pressure drop measurements across the scrubbing system at least every 15 minutes, if applicable. We have assumed that 25% of the sources (i.e., 13 sources) have scrubbing systems.
- h. Semi-annual reports are required by this rule for those sources that have to install continuous monitoring systems (e.g., pressure drop monitors across the scrubbing systems).

**Table 2: Average Annual Agency Burden - NSPS for Lead Acid Battery Manufacturing (40 CFR part 60, subpart KK)**

**(Renewal)**

REPORTING/RECORDKEEPING REQUIREMENT	(A) EPA Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year	(E) Technical Hours per Year @ \$46.21 (E=C x D)	(F) Management Hours per Year @ \$62.27 (F= E x 0.05)	(G) Clerical Hours per Year @ \$25.01 (G= F x 0.1)	Costs per Year
<b>NEW SOURCES</b>								
Notification of construction/reconstruction/modification	1.74	1	1.74	0	0.00	0.00	0.00	\$0.00
Notification of initial startup	0.87	1	0.87	0	0.00	0.00	0.00	\$0.00
Notification of CMS demonstration	0.87	1	0.87	0	0.00	0.00	0.00	\$0.00
Notification of Initial Performance Test	0.43	1.2	0.52	0	0.00	0.00	0.00	\$0.00
Initial Performance Test	20.87	1	20.87	0	0.00	0.00	0.00	\$0.00
Repeat of Performance Test <sup>a</sup>	20.87	0.2	4.17	0	0.00	0.00	0.00	\$0.00
Review Performance Test results <sup>a</sup>	6.96	1.2	8.35	0	0.00	0.00	0.00	\$0.00
<b>NEW AND EXISTING SOURCES</b>								
Review of Semi-annual Reports <sup>b</sup>	3.48	2	6.96	13	90.43	4.52	9.04	\$4,686.74
<b>TOTAL ANNUAL HOURS</b>						<b>104</b>	<b>Hours</b>	
<b>TRAVEL EXPENSES<sup>c</sup></b>								<b>\$0.00</b>
<b>TOTAL ANNUAL BURDEN</b>						<b>104</b>	<b>Hours</b>	<b>\$4,687</b>

Assumptions:

a We have assumed that 20 percent of initial performance tests is typically repeated due to failure.

b We have assumed that 25 percent of the 52 existing sources (i.e., 13 sources) have scrubber systems and are therefore, required to install and maintain a monitor to measure and record pressure drop across the scrubbing system, and submit semi-annual reports.

c We have assumed that there will be no new sources over the three-year period of this ICR. Therefore, the Agency will have no burden associated with initial notifications and travel expenses to attend performance tests that can be attributed to 40 CFR part 60, subpart KK.