

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Secondary Brass and Bronze Production (40 CFR Part 60, Subpart M), Primary Copper Smelters (40 CFR Part 60, Subpart P), Primary Zinc Smelters (40 CFR Part 60, Subpart Q), Primary Lead Smelters (40 CFR Part 60, Subpart R), Primary Aluminum Reduction Plants (40 CFR Part 60, Subpart S), and Ferroalloy Production Facilities (40 CFR Part 60, Subpart Z) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Secondary Brass and Bronze Production (40 CFR Part 60, Subpart M), Primary Copper Smelters (40 CFR Part 60, Subpart P), Primary Zinc Smelters (40 CFR Part 60, Subpart Q), Primary Lead Smelters (40 CFR Part 60, Subpart R), Primary Aluminum Reduction Plants (40 CFR Part 60, Subpart S), and Ferroalloy Production Facilities (40 CFR Part 60, Subpart Z), (Renewal), EPA ICR 1604.09, OMB Control Number 2060-0110

1(b) Short Characterization/Abstract

Below is a brief characterization of the New Source Performance Standards (NSPS) for the subparts covered by this Information Collection Request (ICR):

Secondary Brass and Bronze

The NSPS for Brass and Bronze (40 CFR part 60, subpart M) were proposed on June 11, 1973, promulgated on March 8, 1974, and amended most recently on February 14, 1989. Any facility that commences construction or modification after June 11, 1973 is subject to the requirements of this subpart. These standards apply to the following facilities in secondary brass or bronze production plants: reverberatory and electric furnaces of 1,000 kg or greater production capacity and blast (cupola) furnaces of 250 kg/hr or greater production capacity. Furnaces from which molten brass or bronze are cast into the shape of finished products, such as foundry furnaces, are not considered to be affected facilities. This information is being collected to assure compliance with 40 CFR part 60, subpart M.

It is estimated that there are 11 brass and bronze producers of brass and bronze ingots operating nationwide, of which many are small businesses. We have further assumed that only five of the brass and bronze producers are subject to the NSPS standard, and that no additional sources per year will become subject to the standard in the next three years.

Primary Copper Smelters

The NSPS Primary Copper Smelters (40 CFR part 60, subpart P) were proposed on October 16, 1974, and promulgated on January 15, 1976. Any facility that commences construction or modification after October 16, 1974, is subject to the requirements of this

subpart. These standards apply to the following facilities in primary copper smelters: dryer, roaster, smelting furnace, and copper converter. This information is being collected to assure compliance with 40 CFR part 60, subpart P.

It is estimated that there are seven copper smelters in the United States, of which six are engaged in the production of anode copper from copper ore concentrates using pyrometallic processes and would be subject to the NSPS standard. There is another copper smelter which uses a continuous flash furnace for converting matter copper to blister copper and is not covered by this rule. We have further assumed that no additional sources will become subject to the standard in the next three years.

Primary Zinc Smelters

The NSPS for Primary Zinc Smelters (40 CFR part 60, subpart Q) were proposed on October 16, 1974, and promulgated on January 15, 1976. Any facility that commences construction or modification after October 16, 1974, is subject to the requirements of this subpart. These standards apply to the following facilities in primary zinc smelters: roaster and sintering machines. This information is being collected to assure compliance with 40 CFR part 60, subpart Q.

It is estimated there is only one pyro-metallurgical zinc manufacturing facility operating nationwide which is subject to the NSPS standard. We have further assumed that no additional sources will become subject to the standard in the next three years.

Primary Lead Smelters

The NSPS for Primary Lead Smelters, (40 CFR part 60, subpart R) were proposed on October 16, 1974, and promulgated on January 15, 1976. Any facility that commences construction or modification after October 16, 1974, is subject to the requirements of this subpart. These standards apply to the following facilities in primary lead smelters: sintering machine, sintering machine discharge end, blast furnace, dross reverberatory furnace, electric smelting furnace, and converter. This information is being collected to assure compliance with 40 CFR part 60, subpart R.

It is estimated that there are three primary pyro-metallurgical lead smelters currently operating nationwide. However, only one lead smelter is estimated to be subject to the NSPS standard. We have further assumed that no additional sources will become subject to the standard in the next three years.

Primary Aluminum Reduction Plants

The NSPS for Primary Aluminum Reduction Plants (40 CFR part 60, subpart S) were proposed on October 23, 1974, promulgated on July 25, 1977, and amended most recently on February 14, 1989. Any facility that commences construction or modification after October 23, 1974, is subject to the requirements of this subpart. These standards apply to the following facilities in primary aluminum reduction plants: potroom groups and anode bake plants. This

information is being collected to assure compliance with 40 CFR part 60, subpart S.

It is estimated that there are 23 primary aluminum plants currently operating nationwide. The 23 plants are estimated to have 91 potlines that produce aluminum. Each plant has a paste production plant, and only 17 of these plants have anode bake furnaces. Of the total number of plants, we have assumed that five potlines at four primary aluminum plants are subject to the NSPS standard. However, the Agency has allowed sources to comply with the requirements for potroom groups and anode bake furnaces in 40 CFR part 63, subpart LL (“MACT standard”) as an alternative to the NSPS requirements. We have assumed that sources have elected to comply with the MACT requirements for anode bake furnaces and therefore, the burden for the NSPS standard would be associated with meeting the requirements for potrooms only. We have further assumed that any new source potentially subject to the NSPS standard will elect to comply with the MACT standard provisions and as a result no new sources will become subject to the NSPS standard in the future.

Ferroalloy Production Facilities

The NSPS for Ferroalloy Production (40 CFR part 60, subpart Z) were proposed on October 21, 1974, promulgated on July 25, 1977, and amended most recently on February 14, 1990. Any facility that commences construction or modification after October 21, 1974, is subject to the requirements of this subpart. These standards apply to the following facilities in ferroalloy production plants: electric submerged arc furnaces which produce silicon metal, ferrosilicon, calcium silicon, silicomanganese zirconium, ferrochrome silicon, silvery iron, high-carbon ferrochrome, charge chrome, standard ferromanganese, silicomanganese, ferromanganese silicon, or calcium carbide; and dust-handling equipment. This information is being collected to assure compliance with 40 CFR part 60, subpart Z.

It is estimated that there are only seven ferroalloy production facilities currently operating nationwide. Of the total number of facilities, we have assumed that only one ferroalloy production facility is subject to the NSPS standard. We have further assumed that no additional sources per year will become subject to the NSPS standard over the next three years since demand for domestic production of ferroalloys has declined.

Based on all the information gathered from industry data gathered during the development of the NSPS rules and industry experts and as it is specified in the individual descriptions of the industry sectors above, we have concluded that the production of domestic nonferrous metals has declined over the past decade resulting in no new plants being built and in many plants permanently closing down operations.. Therefore, the assumptions on number of affected sources and labor rates remained the same as the most recent ICR renewal.

The current ICR is based on the most recently approved Information Collection Request (ICR). The cost of this ICR will be \$465,654. 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 EPA Regional Office.

OMB approved the currently active ICR without any “Terms of Clearance.”

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

In addition, Section 114(a) states that the Administrator may require any owner or 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, particulate matter emissions and sulfur dioxide emissions from secondary brass and bronze, primary copper, lead and zinc smelter facilities, particulate matter and total fluoride emissions from primary aluminum reduction plants, and carbon monoxide emissions from ferroalloy production facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subparts M, P, Q, R, S and Z.

2(b) Practical Utility/Users of the Data

The control of particulate matter and sulfur dioxide emissions from secondary brass and bronze producers and primary copper, lead and zinc smelter plants, of particulate matter and total fluoride emissions from primary aluminum reduction plants, and of particulate matter and

carbon monoxide emissions from ferroalloy production plants requires not only the installation of properly designed air pollution control equipment, but also the operation and maintenance of that equipment. These emissions are the result of operation of the affected facilities located at these sources. The subject standards are achieved by the capture of particulate emissions and other pollutants affecting the opacity of the effluent gases emitted using air pollution control technology such as filters, scrubbers, and electrostatic precipitators.

The recordkeeping and reporting requirements in the standard(s) ensure compliance with the applicable regulations which 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(s). Continuous emission monitors are used to ensure compliance with the standard(s) at all times.

The notifications required in the standard(s) 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 and the standard(s) are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/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 60, subparts M, P, Q, R, S, and Z.

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 on July 8, 2009 (74 FR 32581). No comments were received on the burden published in the Federal Register.

3(c) Consultations

For this information collection, the previous ICR renewal was used to obtain burden estimates since this ICR renewal was processed under the "Expedited Approach" option provided in May 1, 2008 guidance. Per this guidance, all data and assumptions from the previous ICR renewal were used as the basis for estimating the hourly and cost burdens associated with this 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 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.

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 (CBI) (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

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC and NAICS Codes

The respondents to the recordkeeping and reporting requirements are source category description. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards with the corresponding North American Industry Classification System (NAICS) codes are listed in the table below.

Standard	SIC Codes	NAICS Codes
NSPS subpart M, Secondary Brass and Bronze Production Plants	3341	331492
NSPS subpart P, Primary Copper Smelters	3331	331411
NSPS subpart Q, Primary Zinc Smelters	3339	331419
NSPS subpart R, Primary Lead Smelters	3339	331419

Standard	SIC Codes	NAICS Codes
NSPS subpart S, Primary Aluminum Reduction Plants	3334	331312
NSPS subpart Z, Ferroalloy Production Facilities	3313	331112

[To compare the SIC and NAICS codes, see the website at <http://www.census.gov/epcd/www/naics.html>.]

4(b) Information Requested

(i) Data Items

All data in this ICR that is recorded and/or reported is required by NSPS for Secondary Brass and Bronze Production (40 CFR part 60, subpart M), Primary Copper Smelters (40 CFR part 60, subpart P), Primary Zinc Smelters (40 CFR part 60, subpart Q), Primary Lead Smelters (40 CFR part 60, subpart R), Primary Aluminum Reduction Plants (40 CFR part 60, subpart S), and Ferroalloy Production Facilities (40 CFR part 60, subpart Z).

A source must make the following reports:

Notifications	
Requirement	Citation
Notification and application of construction or modification	60.7(a)(1)
Notification of actual startup	60.7(a)(3)
Notification of physical or operational change which may increase the emission rate	60.7(a)(4)
Notification of the date of demonstration of continuous monitoring system performance commencement (except for subpart M)	60.7(a)(5)
Notification of the continuous opacity monitoring system data results will be used to determined compliance with the opacity standard	60.7(a)(7)
Notification of the anticipated date for conducting the opacity of observations (visible emissions observations)	60(a)(6) and 60.11(e)(1)
Notification of initial performance test	60.8(d)
Advance notification of each monthly performance test after the initial performance test (NSPS subpart S only)	60.194(c)

Other Reports		
Subpart(s)	Requirement	Citation
NSPS subparts M, P, Q, R, S and Z	Performance test results	60.8(a)
	Report of excess emissions of fluoride (between 1.0 kg/Mg and 1.3 kg/Mg) in any monthly performance test, under NSPS subpart S	60.192(b)
NSPS subparts P, Q, R, S and Z [except for NSPS subpart M which does not required sources to installed a continuous monitoring system (CMS)]	Semiannual reports of excess emissions and deviations from parameters established during the performance test if using a continuous monitoring device, as described below:	60.7(c)
	Excess emissions of opacity and sulfur dioxide under NSPS, subpart P	60.165(d)
	Excess emissions of opacity and sulfur dioxide under NSPS subpart Q	60.175(c)
	Excess emissions of opacity and sulfur dioxide under NSPS subpart R	60.185(c)
	Excess emissions of opacity, under NSPS subpart Z	60.264(b)
NSPS subpart Z	Report of any product change no later than 30 days after implementation of product change	60.264(c)

A source must keep the following records:

Recordkeeping Requirements		
Subpart(s)	Requirement	Citation
NSPS subparts M, P, Q, R, S and Z	Startups, shutdowns, malfunctions, periods where the continuous monitoring system, if required, is inoperative	60.7(b)
NSPS subparts M, P, Q, R, S and Z	Emission test results, continuous monitoring system data, performance test results and other data needed to determine compliance with mass and visible emission limits.	60.7(d), 60.7(f)

Recordkeeping Requirements		
Subpart(s)	Requirement	Citation
NSPS subparts M, P, Q, R, S and Z	Records are required to be retained for two years	60.7(f)
NSPS subpart P	Monthly records of the total smelter charge and the weight percent (dry basis) of arsenic, antimony, lead and zinc contained in the charge.	60.165(a)
NSPS subparts Q and R	Calculations of two-hour average sulfur dioxide concentrations that have been recorded daily for the 12 consecutive 2-hour periods of each operating day.	60.175(b), 60.185(b)
NSPS subpart S	Daily records of the weight of aluminum and anode produced; of production rates of aluminum and anodes; raw material feed rates; and cell or potline voltages.	60.194(a) 60.194(b)
NSPS subpart Z	Daily records of product produced; description of constituents of furnace charge, including the quantity, by weight; time and duration of each tapping period and identification of material tapped; all furnace power input data obtained; all flow rate data or all fan motor power consumption and pressure drop data.	60.265(a)

Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., inlet and outlet concentrations when determining percent efficiency. 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. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronic reporting systems are still not widely used by the regulatory agencies. It is estimated that approximately 10 percent of the respondents use electronic reporting.

ii. Respondent Activities

Respondent Activities
Read instructions.
With the exception of subpart M, respondents shall install, calibrate, maintain, and operate a CMS. Subparts P, Q, R, and Z respondents shall use a CMS to monitor for opacity. In

Respondent Activities
addition, subparts P, Q, and R respondents shall use a CMS to monitor sulfur dioxide emissions. Subpart S respondents shall use a CMS to daily weigh aluminum and anode produced. Subpart Z respondents also shall use a CMS to measure and record the furnace power input, the flow rate through each separately ducted hood of the capture system or, alternatively, measure and record all fan motor power consumption and pressure drop across the fan.
Perform initial and monthly/annual performance test, if applicable, repeat performance tests. Respondents shall use the following Reference Methods (RM): 1) RM 5 for particulate matter concentrations and volumetric flow rate of the effluent gas (all subparts); 2) RM 9 for visible emissions observations of opacity (all subparts); 3) RM 13A or 13B for ducts or stacks and RM 14 for roof monitors to determine the total fluoride concentration and volumetric flow rate of effluent gas (subpart S); and 4) Use RM 3B integrated sampling procedure to determine the carbon monoxide concentration and determine the emission rate correction factor to determine the rate of particulate matter (subpart Z).
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.
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.

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 AIRS Facility Subsystem (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. 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 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 regional offices and EPA headquarters. 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 or operator for two years.

5(c) Small Entity Flexibility

Many of the primary nonferrous facilities are operated by large corporations and there are not any estimated small entities at Primary Copper smelters. Given the small amount of total affected entities, this ICR renewal assumes zero small entities will be affected. In the development of the NSPS standards, the recordkeeping and reporting requirements were selected within the context of the specific subpart and the specific industry sector processes equipment and pollutants. The standards reflect the burden on small businesses. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced. Although the recordkeeping and reporting requirements are the same for small and larger businesses, the Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small businesses.

5(d) Collection Schedule

The specific frequency for each information collection activity for each subpart addressed in this ICR is shown below in Tables 1a through 1d: Annual Respondent Burden and Cost. Section

6(a) includes a description of each individual table and the associated burden, Table 1 Index: Annual Respondent Burden and Cost.

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 each of the subparts 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. The specific requirements and major assumptions have been identified, where appropriate, in the burden calculation. 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 4,923. The recordkeeping hours shown in Table 1 are 31. The reporting requirement hours shown in Table 1 are 4,892. This number represents the addition of the total burden hours from each of the NSPS standards included in this ICR (refer to Table 1 Index, below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS 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	\$114.49 (\$54.52 + 110%)
Technical	\$98.20 (\$46.76 + 110%)
Clerical	\$48.53 (\$23.11 + 110%)

These 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 rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

Table 1 Index: Total Annual Respondent Burden and Cost		

Table 1 Index: Total Annual Respondent Burden and Cost			
Table	NSPS Standard(s)	Labor Hours	Annual Cost
Table 1a	NSPS for Secondary Brass and Bronze Production (40 CFR part 60, subpart M)	1,058	\$100,075
Table 1b	NSPS for Primary Copper Smelters (40 CFR part 60, subpart P); Primary Zinc Smelters (40 CFR part 60, subpart Q); and Primary Lead Smelters (40 CFR part 60, subpart R)	1,766	\$167,082
Table 1c	NSPS for Primary Aluminum Reduction Plants (40 CFR part 60, subpart S)	1,878	\$177,612
Table 1d	NSPS for Ferroalloy Production Facilities (40 CFR part 60, subpart Z)	221	\$20,885
Total		4,923	\$465,654

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

The types of industry costs associated with the information collection activities in the subject standard(s) 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 monitor(s) and other costs such as photocopying and postage.

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

Capital/Startup vs. Operating and Maintenance Costs							
(A) NSPS Standard	(B) Continuous Monitoring Device	(C) Capital/Startup Cost (\$) for One Respondent Affected Facility	(D) Number of New Respondents	(E) Total Capital/Startup Cost (CxD)	(F) Annual O&M Costs (\$) for One Respondent	(G) Number of Respondents with O&M Cost	(H) Total O&M Cost (FxG)
Subparts P, Q, R and Z	Opacity Monitor	\$36,000	0	\$0.00	\$7,500	9	\$67,500
Subparts P, Q and R	CMS that measures sulfur dioxide emissions	\$25,100	0	\$0.00	\$5,400	8	\$43,200
Subpart S	CMS that daily weighs aluminum	Unknown	0	\$0.00	\$5,000	4	\$20,000

Capital/Startup vs. Operating and Maintenance Costs							
(A) NSPS Standard	(B) Continuous Monitoring Device	(C) Capital/ Startup Cost (\$ for One Respondent Affected Facility	(D) Number of New Respondents	(E) Total Capital/ Startup Cost (CxD)	(F) Annual O&M Costs (\$ for One Respondent	(G) Number of Respondents with O&M Cost	(H) Total O&M Cost (FxG)
	and anode produced						
Subpart Z	CMS that measures furnace power input and flow rate or fan motor power consumption and pressure drop across the fan	gas flow- \$13,500 pressure drop- \$1,300	0	\$0.00	\$900	1	\$900
TOTAL				\$0.00			\$131,600

There are no capital/startup costs for this ICR since we have estimated that there will be no new sources during the period of this ICR. This cost is the total of column E in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$131,600. This cost is the total of column H in the above table.

The total respondent costs 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 are estimated to be \$131,600.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. 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 \$11,329.

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

Managerial	\$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2010 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. These rates can be obtained from the OPM web site, <http://www.opm.gov/oca/payrates/index/htm>. Details upon which these estimates are based appear below in Tables 2a through 2d: Average Annual Agency Burden for the Federal Government. Below is a description of each individual table and the associated burden, Table 2 Index: Total Annual Burden and Cost for the Federal Government.

Table 2 Index: Total Annual Burden and Cost for the Federal Government			
Table	NSPS Standard(s)	Labor Hours	Annual Cost
Table 2a	NSPS for Secondary Brass and Bronze Production (40 CFR part 60, subpart M)	0	\$0
Table 2b	NSPS for Primary Copper Smelters (40 CFR part 60, subpart P); Primary Zinc Smelters (40 CFR part 60, subpart Q); and Primary Lead Smelters (40 CFR part 60, subpart R)	74	\$3,317
Table 2c	NSPS for Primary Aluminum Reduction Plants (40 CFR part 60, subpart S)	156	\$7,598
Table 2d	NSPS for Ferroalloy Production Facilities (40 CFR part 60, subpart Z)	9	\$415
Total Cost		239	\$11,330

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 18 existing respondents will be subject to the standard. It is estimated that an additional 0 respondents per year will become subject over the next three years due to a decrease in the domestic nonferrous metals production resulting in many plants closing its operations and new plants being built.

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

Number of Respondents						
NSPS Standard(s)	Year	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
		(A) Number of New Respondents	(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)
Brass and Bronze Production (subpart M)	1	0	0	5	0	5
	2	0	0	5	0	5
	3	0	0	5	0	5
	Average	0	0	5	0	5
Primary Copper Smelters; Primary Zinc Smelters; and Primary Lead Smelters (subparts P, Q, and R)	1	0	8	0	0	8
	2	0	8	0	0	8
	3	0	8	0	0	8
	Average	0	8	0	0	8
Primary Aluminum Reduction Plants (subpart S)	1	0	4	0	0	4
	2	0	4	0	0	4
	3	0	4	0	0	4
	Average	0	4	0	0	4
Ferroalloy Production Facilities (subpart Z)	1	0	1	0	0	1
	2	0	1	0	0	1
	3	0	1	0	0	1
	Average	0	1	0	0	1
Total (average)		0	13	5	0	18

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 18.

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

Total Annual Responses						
NSPS Standard(s)	(A) Number of New Respondents	(B) Number of Reports for New Respondents	(C) Number of Existing Respondents	(D) Number of Reports for Existing Respondents	(F) Number of Existing Respondents That Keep Records but Do Not Submit Reports	(E) Total Annual Responses E=(AxB)+ (CxD) + F
Brass and Bronze Production (subpart M)	0	5	5	0	5	5
Primary Copper Smelters; Primary Zinc Smelters; and Primary Lead Smelters (subparts P, Q, and R)	0	5	8	2	0	16
Primary Aluminum Reduction Plants (subpart S)	0	5	2	1	0	2
			2	12		24
Ferroalloy Production Facilities (subpart Z)	0	5	1	2	0	2
Total	0		18			49

The number of Total Annual Responses is 49.

The total annual labor costs are \$465,654. Details regarding these estimates may be found below in Tables 1a through 2d. Refer to Section 5(d) for a description of the specific tables and the associated burden listed in Table 1 Index: Annual Respondent Burden and Cost.

Note that the total annual capital and O&M costs to the regulated entity are \$131,600. These costs are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

6(e) Bottom Line Burden Hours Burden Hours and Cost Tables

The bottom line burden hours and cost tables for both the Agency and the respondents are attached. The annual public reporting and recordkeeping burden for this collection of information is estimated to average 100.5 (rounded) hours per response.

6(f) Reasons for Change in Burden

There is an increase in the number of hours and responses in the total estimated burden currently identified in the OMB Inventory of Approved ICR Burdens. The burden increase of 9 hours is due to the adjustment of number of responses associated with the semiannual reports for ferroalloy production facilities. The number of responses for ferroalloy production facilities was correct when accounting for the total annual responses and thus did not affect the total

number of responses but was incorrect in the calculation of burden hours. The total number of responses increased from 29 to 49 due to an adjustment of the number of reports for primary aluminum reduction plants in the total annual responses calculation. The change did not affect the calculations of burden hours.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 100.5 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-2009-0421. 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) 566-1752. 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 Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0421 and OMB Control Number 2060-0110 in any correspondence.

Part B of the Supporting Statement

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