

**SUPPORTING STATEMENT
FOR OMB REVIEW OF EPA ICR No. 2400.01:**

**INFORMATION COLLECTION REQUEST FOR SECONDARY ALUMINUM
PRODUCTION NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR
POLLUTANTS (NESHAP) RISK AND TECHNOLOGY REVIEW (RTR)**

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January 18, 2011

SUPPORTING STATEMENT
INFORMATION COLLECTION REQUEST FOR NESHAP FOR SECONDARY
ALUMINUM PRODUCTION RESIDUAL RISK AND TECHNOLOGY REVIEW (RTR)

Part A of the Supporting Statement

1. Identification of the Information Collection

(a) Title of the Information Collection

“NESHAP for Secondary Aluminum Production Residual Risk and Technology Review (RTR).” This is a new information collection request (ICR). The EPA ICR number is 2400.01 and the OMB Control number is 2060-NEW.

(b) Short Characterization

This information collection is being conducted by EPA’s Office of Air and Radiation (OAR) to assist the EPA Administrator, as required by sections 112(d)(6), and 112(f) of the Clean Air Act (CAA), as amended, to determine the current affected population of secondary aluminum production processes and to reevaluate emission standards for this source category. The information from this ICR would also be made available to the public.

This is a one-time information collection. Currently, information necessary to identify secondary aluminum production facilities is available from EPA’s National Emissions Inventory (NEI). The NEI does not contain all of the information (equipment, capacity, materials processed, emissions collection and control systems, regulatory alternatives used, and emission test data) necessary to characterize secondary aluminum production NESHAP affected sources for purposes of regulatory analyses. Although some of the needed information may be included in Title V or state air emission permits, most permits do not contain all of the information needed and are not readily available from any single source. Furthermore, there are no readily available sources for previously conducted performance test results that will provide data for emissions of the variety of pollutants under consideration. To obtain this information, EPA is soliciting information with a survey, under authority of CAA section 114, from all affected units. EPA intends to administer the survey in electronic (spreadsheet) format. The survey will be sent to all companies that own or operate secondary aluminum manufacturing facilities.

The EPA estimates the cost to industry of the electronic information collection (gathering, entering, and quality assuring (QA) of data submitted in response to the survey) will

be 32,529 hours and \$3,081,849 which includes \$5,076 in operation and maintenance (O&M) costs for mailing survey responses saved to compact disc to EPA.

2. Need for and Use of the Collection

(a) Need/Authority for the Collection

The secondary aluminum production source category includes any establishment using clean charge, aluminum scrap, or dross from aluminum production, as the raw material and performing one or more of the following processes: scrap shredding, scrap drying/delacquering/decoating, thermal chip drying, furnace operations (i.e., melting, holding, sweating, refining, fluxing, or alloying), recovery of aluminum from dross, in-line fluxing, or dross cooling. A secondary aluminum production facility may be independent or part of a primary aluminum production facility. For purposes of this subpart, aluminum die casting facilities, aluminum foundries, and aluminum extrusion facilities are not considered to be secondary aluminum production facilities if the only materials they melt are clean charge, customer returns, or internal scrap, and if they do not operate sweat furnaces, thermal chip dryers, or scrap dryers/delacquering kilns/decoating kilns. The federal emission standard that is the subject of this information collection is the National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production (40 CFR part 63, subpart RRR).

The existing subpart RRR NESHAP regulates HAP emissions from facilities that are major sources of HAP that operate aluminum scrap shredders, thermal chip dryers, scrap dryers/delacquering kilns/decoating kilns, group 2 furnaces, sweat furnaces, dross only furnaces, rotary dross coolers, and secondary aluminum processing units (SAPUs). SAPUs include group 1 furnaces and in-line fluxers. Area sources of HAP are regulated only with respect to emissions of dioxins/furans (D/F) from thermal chip dryers, scrap dryers/delacquering kilns/decoating kilns, sweat furnaces, and SAPUs.

Section 112(f)(2) of the CAA directs EPA to conduct risk assessments on each source category subject to maximum achievable control technology (MACT) standards and determine if additional standards are needed to reduce residual risks. The section 112(f)(2) residual risk review is to be done within 8 years after promulgation. Section 112(d)(6) of the CAA requires EPA to review and revise the MACT standards, as necessary, taking into account developments in practices, processes, and control technologies. The section 112(d)(6) technology review is to be done at least every 8 years. The NESHAP for Secondary Aluminum Production (40 CFR part

63, subpart RRR) was promulgated on March 23, 2000. Owners or operators of an existing affected source had to be in compliance by March 24, 2003. The owner or operator of a new affected source (that commenced construction or reconstruction after February 11, 1999) must comply with the requirements of this subpart by March 23, 2000 or upon start-up, whichever is later. Compliance reporting for the rule was first collected in 2003.

The data used as the basis for the originally promulgated secondary aluminum production NESHAP are over 15 years old. The Agency is aware that significant changes have been made in the intervening years in the number of affected facilities, in industry ownership, practices, and in emission collection and control configurations. Furthermore, in light of the statutory requirements for reviewing emission standards under CAA section 112, the Agency has concluded that obtaining updated information will be important to informing its decisions on the secondary aluminum production NESHAP RTR. Data received by EPA for compliance purposes (e. g. periodic performance test reports from major sources) typically do not include data required for residual risk assessment including stack heights, detailed stack (and other discharge point) locations, average throughputs (as opposed to throughputs under test conditions), capture system descriptions, average flux rates (as opposed to flux rates under test conditions), and other information necessary for technology review.

During the RTR assessment process, in addition to conducting source category risk assessments, EPA also examines the risks from the entire “facility,” where the “facility” includes all HAP-emitting operations within a contiguous area and under common control. In other words, for each facility, EPA examines the risks due to HAP emissions not only from the source category of interest, but also due to HAP emissions from all other emission sources at the facility. For these facility-wide risk analyses, the modeled source category risks are compared to the facility-wide risks to determine the portion of facility-wide risks that can be attributed to the secondary aluminum production source category, and to ultimately determine whether additional controls may be needed on secondary aluminum processes in order to address the cumulative risks associated with facility-wide emissions. We are requesting facility-wide HAP emissions data in order to improve the accuracy of these facility-wide risk analyses. The facility-wide risk analyses are also used to inform our understanding of the potential for any HAP-related environmental justice issues that might be associated with each category as required under Executive Order 12898. To do this, EPA evaluates the distribution of significant HAP-related

cancer and non-cancer risks across different social, demographic, and economic groups within the populations living near the facilities where these source categories are located. Emissions of HAPs not regulated under the existing NESHAP (e. g. emissions of additional HAP other than D/F from area sources subject to D/F emission limitations) and emissions of HAP from collocated affected sources not regulated under the secondary aluminum production NESHAP contribute to facility-wide risk.

Information collected directly from companies owning or operating secondary aluminum production facilities will have the greatest practical utility for purposes of performing the RTR as information from the affected industry will contain the most up-to-date, accurate, and reliable equipment and operational data for each facility. At present, EPA has facility-wide data in the National Emissions Inventory for 2005; however some of these data may be missing, erroneous or not representative of current emissions. The ICR will request information for current equipment information and emissions from the most recent years of production, and therefore, will not suffer from the considerable “lag time” that can be associated with different permit review cycles (e.g., where the currently available inventory does not yet reflect recent changes in equipment).¹

CAA section 114(a) states that the Administrator may require any owner or operator subject to any requirement of the 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.

(b) Use/Users of the Data

As mentioned previously, the data used for the originally promulgated NESHAP are incomplete, outdated and do not adequately reflect changes in emissions collection and control

¹There is a “lag time” associated with compiling large State or national emission inventories. For example, an updated version of the NEI database is compiled every three years, but the information contained in the NEI may be based on prior years if states do not submit current data. There can also be a “lag time” associated with posting of recent permits to State websites (particularly if permits are only posted every 5 years as they are reviewed).

configurations that have occurred since promulgation of the MACT standards. The MACT standards contain a number of compliance alternatives to allow for a variety of equipment configurations and process changes to be used in meeting the emission standards. At present, the EPA does not have a database reflecting the post-MACT configurations of secondary aluminum production affected sources and air pollution control systems. It is essential for the EPA to have updated information to use in the regulatory analyses required under CAA sections 112(d) and 112(f)(2). In some cases (e. g. alternate emission limits for scrap dryers/ delacquering kilns decoating kilns) the characteristics of the emissions control system affect the allowable emissions and thus influence the residual risk. The data would also allow the Agency to evaluate compliance options for startup and shutdown periods.

The data collected will be used to update facility information and equipment configuration, develop new estimates of the population of affected units, and identify the control measures and emission limits being used for compliance with the existing NESHAP. This information, along with existing permitted emission limits will be used to establish a baseline for purposes of the regulatory reviews. Emission limits applicable to secondary aluminum processing units (SAPUs) and scrap dryers/ delacquering kilns/ decoating kilns are variable, and information on current emission limits will improve allowable emission estimates. The emissions test data collected will be used to verify the performance of existing control measures, examine variability in emissions, evaluate emission limits, and to determine the performance of superior control measures that may be considered for purposes of reducing residual risk. Emissions data may also be used along with process and emission unit details to consider subcategories for further regulation and to estimate the environmental and cost impacts associated with any regulatory options considered.

In addition to informing the RTR regulatory analyses for the secondary aluminum production industry, it is EPA's intent that the NATA NEI updates supplied through this information collection be used in future versions of the NATA NEI and its successor, the Emissions Inventory System (EIS). The NEI is used by EPA, States, and the public for a variety of purposes including tracking of national trends in emissions of criteria and hazardous air pollutants. More information in the NEI can be found at <http://www.epa.gov/air/data/neidb.html>.

The non-confidential information collected with this ICR would also be available to the public, including aluminum industry trade groups that may find the information useful for their

ongoing data gathering, analyses, and publications. In addition, such trade groups may wish to use the data collected to review and verify EPA's regulatory conclusions.

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

(a) Non-duplication

The Agency recognizes that some of the information requested in the information collection effort may already be included in the submittals made by individual companies, pursuant to State and national emission inventories, operating permit applications, initial notification forms, and compliance reports. However, the complete extent of the data fields requested under this survey is not available in any consistent or usable format. Additionally, these sources do not provide detailed emissions test data. As mentioned previously, there is a lag time associated with State and national emission inventories, and permit review cycles. There is also a lag time associated with obtaining emission test reports from State agencies (i.e., agencies may be reluctant to release emission test results they have not yet processed). Agency resources vary greatly from state to state, as does the ease of locating and retrieving these reports. The EPA's proposed information collection seeks up-to-date equipment configuration and operational data for the most recent years of production. Although some State permits are provided to the public as searchable portable document format files (pdfs), many States do not provide electronic versions of their issued Title V permits. Even when the permit is available, the unit-specific operating data are often not contained within the permit. Some of the initial notifications and compliance reports submitted are available in hard-copy only, whereas only the facility-level information (facility name, location, contact) is available in an electronic format. In order to address startup and shutdown issues, the Agency obtained three Startup, Shutdown and Malfunction plans and found them to contain a widely variety of detail. Semi-annual compliance reports contain almost no information for periods in which no deviations occurred. Variation in the level of detail of permits and compliance reports means that it would be extremely time consuming for the Agency to obtain the level of process detail needed for regulatory analyses from existing documents (assuming that these documents were readily available to EPA), and that significant data gaps would remain even after data from existing documents were compiled. Emissions test reports are often retained as hard copies by State agencies and thus are not readily available for all facilities.

To summarize, the information requested relevant to the current (post-MACT) equipment configuration and operation, regulatory alternatives, emissions data, and effectiveness of various control systems at removing HAP is not readily available from other sources. In the absence of an industry data collection, the EPA would be forced to try to obtain permits, compliance reports, and emissions test reports from States; extract information from these reports (which vary in detail); and then to fill data gaps where information is not available from the reports obtained. This process of acquiring and mining data from existing reports would require more time than an industry data collection, and ultimately can be expected to yield incomplete information. Information collected directly from companies operating secondary aluminum production processes would provide the most timely and complete post-MACT data set with the greatest practical utility for purposes of performing the RTR reviews that are due to be completed under CAA sections 112(d) and (f)(2).

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

EPA published a Federal Register notice (75 FR 43521) soliciting public comment on this proposed collection. EPA received one comment. A response to comment document has been included with this submittal.

(c) Consultations

Feedback was received from the Aluminum Association regarding the scope of the secondary aluminum production industry survey and those comments can be found in the docket. We also solicited comment from the Institute of Scrap Recycling Industries, but received none. An opportunity for detailed comments on the electronic survey was provided by the *Federal Register* notice concerning the availability of the ICR for public review and comment.

(d) Effects of Less Frequent Collection

EPA expects the information requested in this survey to be a one-time effort, and thus, it is not relevant to discuss less frequent collection.

(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

(f) Confidentiality

Respondents will be required to respond under the authority of CAA section 114. If a respondent believes that disclosure of certain information requested would compromise a trade

secret, it should be clearly identified as such and will be treated as confidential until and unless it is determined in accordance with established EPA procedure as set forth in 40 CFR Part 2 not to be entitled to confidential treatment. All 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). Any information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. 1905. If no claim of confidentiality accompanies the information when it is received by EPA, it may be made available to the public without further notice (40 CFR 2.203, September 1, 1976). Because CAA section 114(c) exempts emission data from claims of confidentiality, the emission data provided may be made available to the public. Therefore, emissions data should not be marked confidential. A definition of what EPA considers emissions data is provided in 40 CFR 2.301(a)(2)(i).

(g) Sensitive questions

This section is not applicable because this ICR will not involve matter of a sensitive nature.

4. The Respondents and the Information Requested

(a) Respondents/NAICS Codes.

Respondents affected by this action are owners/operators of secondary aluminum production facilities. In the U.S., there are approximately 423 secondary aluminum production facilities including approximately 100 major sources of HAP and 323 area sources of HAP. Major sources are currently regulated for emissions of particulate matter (PM) as a surrogate for particulate metal HAP, hydrogen chloride, dioxins and furans (D/F), and total hydrocarbon (THC) as a surrogate for organic HAP other than D/F. Area sources are regulated only for D/F. Approximately 200 companies operate secondary aluminum production facilities with an average of approximately two facilities per company.

The North American Industry Classification System (NAICS) codes for respondents affected by the information collection include 331314 for secondary smelting and alloying of aluminum as well as secondary aluminum production facilities that are collocated at primary aluminum production facilities (331312); aluminum sheet, plate and foil manufacturing facilities (331315); aluminum extruded product manufacturing facilities (331316); other aluminum rolling and drawing facilities (331319); aluminum die casting facilities (331521); aluminum foundry

facilities (331524); and sweat furnaces which can be included in various NAICS categories including, but not limited to, 562920, 493110, 811490, 423320, 423930, 423120, 423140, 339999, and 488410.

(b) Information Collected

(i) Data Items. Each owner/operator of each secondary aluminum production facility will be required to complete an electronic survey that contains several components. The draft electronic survey is a Microsoft Excel spreadsheet file that is divided into two worksheets (“tabs” within the spreadsheet). Respondents that own or operate major sources of HAP will be required to complete the major source tab. Respondents that own or operate area sources of HAP will be required to complete the area source tab. Respondents will also be asked to supply plant schematics; title V permits; operating permits; permit applications; performance test reports; emission inventory reports; copies of consent decrees or orders affecting their plants; notices of operating violations; startup, shutdown and malfunction plans; and site-specific operating, maintenance and monitoring plans. Respondents will also be required to correct, update or complete a table of data for their plants for inclusion in the NATA NEI.

Although a large amount of information is needed for regulatory review of the NESHAP, the EPA has designed the secondary aluminum production information collection in a way to minimize the burden associated supplying and processing this information. The EPA will pre-populate survey spreadsheets with each facility's 2005 NATA NEI data set to be reviewed (thereby reducing respondent burden to locate and import their facility's NEI data). For facilities that are not presently included in the NATA NEI, respondents will be provided with a blank spreadsheet in which to enter data. The secondary aluminum production information collection is being administered in spreadsheet form (as opposed to data base software) because respondents are likely to be more familiar with spreadsheet use than with data bases and, following QA, data from the Excel spreadsheet rows can be readily imported into Access data base software for use by the Agency (eliminating the time required for EPA to key-enter data). The secondary aluminum production spreadsheets will be provided to owners and operators on a compact disk which respondents can use to save and submit their survey spreadsheets and other materials such as electronic copies of flow diagrams and emission test reports. The burden associated with collection of emissions test data has been reduced in several ways:

- (1) Area sources of HAP are being asked to respond to a shortened worksheet that addresses affected sources that are regulated under the NESHAP and other sources of HAP emissions. The worksheet contains separate tabs for area sources and major sources which are clearly marked and described in the instructions.
- (2) Data are being requested for the HAP surrogates defined in the MACT standards and any available data related to speciated HAP.
- (3) Respondents may provide electronic or hard copy emissions test reports, whichever they find to be less burdensome.
- (4) Respondents are being asked to transmit the responses (except for confidential business information) electronically.

(ii) *Respondent Activities.* The activities a respondent must undertake to fulfill the requirements of the information collection are presented in Attachment 2. These include: i) read instructions; ii) provide information on each affected source through electronic survey; and iii) submit hard or electronic copies of flow diagrams, previous emission test reports, and available CEMS or COMS data.

5. The Information Collected – Agency Activities, Collection Methodology, and Information Management

(a) Agency Activities

A list of activities required of the EPA is provided in Attachment 3. These include: i) develop electronic questionnaire and packages for mail out; ii) answer respondent questions; iii) review and analyze responses and emissions data; and iv) analyze requests for confidentiality.

(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA will use personal computers and applicable spreadsheet and database software. To better facilitate uniformity in the format of the requested data, and, thus, increase the ease of database entry, standardized survey questions, example responses, and Excel spreadsheet forms will be distributed to respondents. EPA will ensure the accuracy and completeness of the collected information by reviewing each submittal. Flow diagrams may be used to answer any questions revealed during quality assurance (QA) of each submittal. The EPA may place follow-up calls to respondents should questions remain after reviewing all materials submitted. Following QA of each submittal, the spreadsheet information from each facility will be uploaded into an Access data base for further analysis. Portions of survey responses claimed as CBI will be housed in a separate data base from the non-CBI survey responses. In addition, a copy of the NATA NEI updates submitted will be routed for inclusion in EPA's residual risk input data base, and for

inclusion in future versions of the NATA NEI and its successor, the Emissions Inventory System (EIS). Emissions test report data will be entered into a data base by EPA (or EPA contractor personnel) familiar with extracting test data from test reports. The resulting data bases will be QA'd prior to and as part of regulatory analyses.

(c) Small Entity Flexibility

All respondents required to comply with the secondary aluminum production survey will be subject to the same requirements. EPA expects that half of the respondents may be small entities. Small entities are likely to be area sources. Small entities and other companies that own and/or operate facilities that are not major sources of HAP emissions (i.e., area sources) will have fewer affected sources per facility and fewer data (because area sources are regulated only for D/F). Even if they are major sources of HAP emissions, small entities would have fewer portions of the survey to complete, as their operations would likely be less extensive. The Agency also plans to use an electronic format of the questionnaire in order to reduce the burden and improve the data accuracy from all respondents, including small entities. In addition, the survey will contain a question to determine the small entity status of a facility. This question will help to identify, quantify, and minimize the burden on small entities during the rulemaking process.

(d) Collection Schedule

EPA anticipates issuing the CAA section 114 letters by late-2010. These CAA section 114 letters would require the owner/operator of each secondary aluminum production facility to complete the secondary aluminum production facility survey spreadsheet (including NATA NEI update) and submit emissions test data within 60 days of receipt of the survey. EPA will compile and analyze survey response data upon receipt.

6. Estimating the Burden and Cost of the Collection

(a) Estimating Respondent Burden and Costs

Attachment 2 presents estimated costs for the required data collection activities. Labor rates and associated costs are based on Bureau of Labor Statistics (BLS) data. Technical, management, and clerical average hourly rates for private industry workers and were taken from the United States Department of Labor, Bureau of Labor Statistics, September 2009, "Table 2. Civilian Workers, by occupational and industry group," available at www.bls.gov/news.release/ecec.t02.htm. Wages for occupational groups are used as the basis

for the labor rates with a total compensation of \$46.76 per hour for technical, \$54.52 per hour for managerial, and \$23.11 per hour for clerical. These rates represent salaries plus fringe benefits and do not include the cost of overhead. An overhead rate of 110 percent is used to account for these costs. The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$98.20, management at \$114.49, and clerical at \$48.53. These estimates represent the one-time burden that will be incurred by the recipients.

(b) Estimating Agency Burden and Costs

The costs the Federal Government would incur are presented in Attachment 3. The Agency labor rates are from the Office of Personnel Management (OPM) 2009 General Schedule which excludes locality rates of pay. These rates can be obtained from Salary Table 2010-GS, available on the OPM website at www.opm.gov/oca/10tables/html/gs_h.asp. The government employee labor rates are \$16.28 per hour for clerical (GS-7, Step 1), \$34.34 for technical (GS-13, Step 1), and \$47.74 for managerial (GS-15, Step 1). These rates were increased by 60 percent to include fringe benefits and overhead. The fully-burdened wage rates used to represent Agency labor costs are: clerical at \$26.05, technical at \$54.94, and managerial at \$76.38.

(c) Estimating the Respondent Universe and Total Burden and Costs

Estimates based on previous surveys of the industry and review of operating permits indicate that the potential respondent universe consists of 423 facilities. All 423 of these facilities will be required to complete some portion of the electronic survey. The government burden estimate provided in Attachment 3 assumes that 5 percent of the respondents will not be subject to the NESHAP. However, it is not known how many of these claims will be valid so all respondents are included in the burden estimate for respondents (in Attachment 2). Attachment 2 lists the various portions of the survey in detail.

(d) Bottom Line Burden Hours and Costs Tables

(i) Respondent tally. The bottom line industry burden hours and costs, presented in Attachment 2, are calculated by summing the person-hours column and by summing the cost column. The burden and cost to the industry is 32,529 hours and \$3,081,849. No capital or annualized costs are applicable because this is a one-time submittal. O&M costs of \$5076.00 are estimated for postage to mail in the survey response to EPA.

(ii) Agency tally. The bottom line Agency burden and cost, presented in Attachment 3 is calculated in the same manner as the industry burden and cost. The estimated burden and cost

are 2,290 hours and \$122,221, plus \$7,280 in O & M costs to send CAA section 114 letters to all respondents with electronic return receipt and a compact disk containing the electronic spreadsheet, pre-populated NATA NEI spreadsheets, questionnaire printing costs, and computer storage of data received.

(iii) *The complex collection.* This ICR is a simple collection; therefore, this section does not apply.

(iv) *Variations in the annual bottom line.* This section does not apply as this is a one-time collection.

(e) *Reasons for Change in Burden*

This is the initial estimation of burden for this information collection; therefore, this section does not apply.

(f) *Burden Statement*

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 77 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-2010-0469, 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 3334, 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-2010-0469 and OMB Control Number 2060-NEW in any correspondence.

List of Attachments

1. Draft Questionnaire Content
2. Industry Burden and Costs for Responding to the Questionnaire
3. Agency Burden and Costs

Attachment 1.

Draft Questionnaire Content

The draft questionnaire may be found in separate files accompanying this supporting statement, including the following:

File name	Description
<i>21074502</i>	This is the paper copy of the electronic questionnaire which will be sent with the compact disk and 114 letter. Attachments to this document are: (1) a list of definitions useful in completing the questionnaire; and (2) a list of hazardous air pollutants based on section 112(b) (1) of the CAA as currently modified.
<i>secal_allcompany_questionnaire.xls</i>	This multi-tabbed spreadsheet file is the electronic version of the survey. It includes separate tabs for area sources and major sources, as well as tabs with definitions and the current HAP list.
<i>0202 NATA NEI data_unlisted.xls</i>	Blank spreadsheet to be provided for entry of data by facilities for which no NATA NEI data are presently available.
<i>0202 NATA NEI 2005 data_listedsample.xls</i>	Sample populated spreadsheet for correction and updating of the presently available NATA NEI data set.

Attachment 2. Industry Burden and Cost for Responding to Questionnaire						
Respondent Activity	(A) Hours per Occurrence	(B) Occurrences/ Respondent /Year	(C) Hours/ Respondent/ Year (A x B)	(D) Respondents/ Year ¹	(E) Technical Hours/Year (C x D)	(F) Managerial Hours/Year (E x 0.05)
1. APPLICATIONS (Not Applicable)						
2. SURVEY AND STUDIES (Not Applicable)						
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS						
4. REPORT REQUIREMENTS						
A. Read Instructions	4	1	4	423	1,692	85
B. Required Activities						
a. Complete and submit survey spreadsheet tabs, as follows:						
All facilities information	20	1	20	423	8,460	423
Major source information	120	1	90	100	9,000	450
Area source information	16	1	12	323	3,876	194
b. Prepare or copy/scan plant schematic						
c. Copy/scan and submit reports as follows:						
Title V permit	2	1	2	100	200	10
Operating permit	2	1	2	323	646	32
Permit application	2	1	2	20	40	2
Performance test reports	8	1	8	300	2,400	120
Emission inventory reports	2	1	2	100	200	10
Consent decrees or orders	2	1	2	20	40	2
Notice of operating violations	2	1	2	20	40	2
Startup, shutdown, malfunction (SSM) plan	2	1	2	423	846	42
Site-specific operating, maintenance and monitoring plan	2	1	2	423	846	42
C. Create Information (Included in 4B)						
D. Gather Existing Information (Included in 4B)						
E. Write Report (Not Applicable)						
5. RECORDKEEPING REQUIREMENTS (Not						
TOTAL ANNUAL LABOR BURDEN AND COST					28,286	1,414
				<i>total=</i>	32,529	<i>avg hr/respondent=</i>
ANNUAL CAPITAL COSTS (Not Applicable)						
ANNUALIZED CAPITAL COSTS (Not Applicable)						
TOTAL ANNUAL COSTS (O&M) ²						
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)						
¹ The number of respondents per year is based on 423 facilities with 1 facility/respondent.						
² Postage Costs for mailing survey responses to EPA are estimated at \$12 for Federal Express letter size envelope flat rate.						

Attachment 3. Agency Burden and Costs							
Agency Activity	(A) EPA Hours/ Occurrence	(B) Occurrences/ Respondent/ Year	(C) EPA Hours/Respondent/ Year (A x B)	(D) Respondents/ Year¹	(E) EPA Technical Hours/ Year (C x D)	(F) EPA Managerial Hours/Year (E x 0.05)	(G) EPA Clerical Hours/Year (E x 0.10)
Develop/revise questionnaire spreadsheets and instructions	200	1	200	1	200	10	20
Pre-populate spreadsheets with existing NEI data	0.1	1	0.1	150	15	1	2
Mail out questionnaire ²	0.2	1	0.2	423	85	4	8
Analyze and respond to claims that survey is not required because company is not subject to NESHAP ³	0.2	1	0.2	10	2	0	0
Answer respondent questions via phone or email ⁴ .	0.5	1	0.5	53	27	1	3
Analyze requests for confidentiality ⁵	1	1	1	106	106	5	11
Review and analyze responses (including follow-up) ⁶							
NEI data	0.5	1	0.5	423	212	11	21
Sector survey spreadsheet data	2	1	2	423	846	42	85
Review/analyze emissions test data ⁷	0.5	1000	500	1	500	25	50
Total Annual Hours					1,992	100	199
					total =	2,290	hours
Expenses (O&M)⁸							
Printing questionnaire							
Compact disks							
Postage							
Computer storage of data							
Total Expenses							
TOTAL ANNUAL LABOR BURDEN AND COST							

1. The number of respondents per year is based on the estimated number of respondents.
2. Mailout package includes section 114 letter with standard enclosures, hard copy of survey overview document, and compact disk containing spreadsheet files. Assumes EPA will mail one questionnaire per company.
3. Assumes 5% of companies provide documentation. It is not known how many of these claims will be valid so this number of facilities has not been subtracted from the burden estimates associated with completing the survey.
4. Assumes that 12.5% of the respondents will have questions.
5. Assumes that 25% of facilities will have confidential data.
6. Assumes 100 major sources and 323 area sources.
7. Some emissions test results will require little time for analysis (e.g., those within the range of other test results), while others will require additional time (e.g., potential errors). Expect to result spend an average of 0.5 hr per test
8. Copy costs are estimated for 70 pages at \$0.05/page. Compact disks were estimated at \$0.20/each. Postage Costs are estimated at \$6 for Federal Express letter size envelope flat rate. Data storage estimated at \$21/GB/mo, assuming 25 MB per facility, 400 facilities and 12 month storage. Webpage cost estimated at \$85/mo for 6 months.