

**Summary of Comments and Responses for the Information Collection Request for National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production Residual Risk and Technology Review (RTR); EPA ICR Number 2400.01
(75 FR 43520, July 26, 2010)**

**Metals and Minerals Group
Sector Policies and Program Division
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency**

October 6, 2010

INTRODUCTION

On July 26, 2010, EPA published a notice in the Federal Register (75 FR 43520) announcing their intent to submit a request to the Office of Management and Budget (OMB) for a new Information Collection Request (ICR). The ICR will be used to collect certain information from secondary aluminum production facilities for the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production Residual Risk and Technology Review (RTR); EPA ICR Number 24001.01.

The notice included a request for comments on specific aspects of the proposed ICR; we received comments from one commenter in response to the notice. The comments were submitted by Robert P. Strieter, VP, Environment Health and Safety, The Aluminum Association. The comments are located in docket number EPA-HQ-OAR-2010-0469-0007. The EPA responses to the comments follow the comments below, as appropriate.

SUMMARY OF COMMENTS AND RESPONSES

Comment: Requests for information relating to collocated (non-subpart RRR regulated) sources of emissions are outside the scope of the RTR project and are not justified in the Supporting Statement. The commenter cited requests for information pertaining to HAP emissions, control devices, discharge characteristics, criteria air pollutants and energy usage for these sources.

Response: During the RTR processes, EPA 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 HAP emissions not only from the source category of interest, but also emissions of HAP from all other emission sources at the facility. EPA analyzes risks due to the inhalation of HAP that are emitted “facility-wide” for the populations residing within 50 km of each facility. For these facility-wide risk analyses, the modeled source category risks will be compared to the facility-wide risks to determine the portion of facility-wide risks that could be attributed to the secondary aluminum production source category. We are requesting these data in order to conduct an accurate facility-wide risk analysis. The facility wide risk analyses will also be used to determine the potential for any environmental justice issues that might be associated with each category as required under Executive Order 12898. EPA evaluates the distribution of 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. We are requesting these data in order to conduct an accurate facility-wide risk analysis. In addition to the facility-wide risk analysis, we are requesting information on criteria pollutants from all air emission sources consistent with EPA’s new multi-pollutant sector based strategy. Sector-based approaches are based on integrated assessments that consider multiple pollutants in a comprehensive and coordinated manner to manage emissions and CAA requirements. The benefits of multi-pollutant and sector-based analyses and approaches include the ability to identify optimum control strategies, considering feasibility, costs, and benefits across the different pollutant types while streamlining administrative and compliance complexities and reducing conflicting and redundant requirements. Obtaining facility-wide emissions are needed to determine if any co-benefits have been achieved concerning the reduction of non-HAP emissions resulting from the

implementation of the NESHAP. This could improve the implementation of any future control strategies for this sector.

EPA has revised the supporting statement to include justification for requesting these data. In addition, EPA has revised the questionnaire, as suggested by the commenter, to eliminate the request for respondents to reenter criteria pollutant data if this data is included in emissions inventory reports.

Comment: The proposed survey data form is extremely long and the specified 60 day response time is inadequate. The commenter requested that this be extended to 120 days.

Response: EPA has agreed to complete the RTR, and propose and promulgate a rule in accordance with a court-ordered deadline. Because of the time required to review and analyze the responses, including sufficient time for quality assurance, EPA must limit the response time to 60 days. It should also be noted that respondents also have had time to review the draft questionnaire to determine in advance the types of information that will be requested.

Comment: The commenter has noted several instances where the questionnaire is ambiguous or potentially confusing.

Response: EPA has revised the questionnaire on the basis of this comment to clarify the questions and terminology to convey the information requested more precisely.