

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal), EPA ICR Number 1894.07, OMB Control Number 2060-0433

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production were proposed on February 11, 1999, promulgated on March 23, 2000, and final rule amendments published on December 19, 2005. These regulations apply to component processes at secondary aluminum production plants that are major sources and area sources, including aluminum scrap shredders, thermal chip dryers, scrap dryers/delacquering kilns/decoating kilns, secondary aluminum processing units (SAPUs) composed of in-line fluxers and process furnaces (including both melting and holding furnaces of various configurations), sweat furnaces dross-only furnaces, and rotary dross coolers, commencing construction, or reconstruction after the date of proposal. As a result of a 2002 rule amendment, owners and operators of certain aluminum die casting facilities, aluminum foundries, and aluminum extrusion facilities were excluded from the rule coverage. Respondents do not include the owner or operator of any facility that is not a major source of hazardous air pollutant (HAP) emissions, except for those that are area sources of dioxins/furans emissions. This information is being collected to assure compliance with 40 CFR part 63, subpart RRR.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/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 either the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the U.S. 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).

Over the next three years, an average of 1,834 respondents (81 major sources and 1,753 sweat furnaces) per year will be subject to the standard, and 70 additional sweat furnaces per year will become subject to the standard. We do not estimate any additional new major sources over the three-year period of this ICR.

All of the secondary aluminum facilities in the United States are owned and operated by the secondary aluminum industry (the “Affected Public”). 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” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (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 and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal).

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (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 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. 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, HAP emissions from facilities in secondary aluminum manufacturing cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart RRR.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard 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. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance tests, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard 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 ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standards 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 63, subpart RRR.

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 (77 FR 47631) on August 9, 2012. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. 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 EPA's Office of Compliance. OTIS is EPA's 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.

Consultations with industry representatives were conducted to determine if there is any way for EPA to reduce the recordkeeping and reporting burden or improve the language in the standards to facilitate industry compliance. Industry representatives were also provided an opportunity to comment on the ICR burden, including the size, growth, and other characteristics of the regulated industry. For this renewal, we contacted: 1) the Aluminum Association, at (703) 358-2960; and 2) the North American Die Casting Association (NADCA), at (202) 842-4864.

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

These reporting or recordkeeping requirements do not 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 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 five years. In addition, 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 (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 Codes

The respondents to the recordkeeping and reporting requirements are secondary aluminum production facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, which correspond to the North American Industry Classification System (NAICS) codes, are listed below for this source category.

Standard (40 CFR, Part 63, Subpart RRR)	SIC Codes	NAICS Codes
Secondary Smelting and Alloying of Aluminum	3341, 3399	331314
Primary Aluminum Production	3334	331312
Aluminum Sheet, Plate, and Foil Manufacturing	3353	331315
Aluminum Extruded Product Manufacturing	3354	331316
Other Aluminum Rolling and Drawing	3355	331319
Aluminum Die-Casting Foundries	3363	331521
Aluminum Foundries (except Die-Casting)	3365	331524

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR).

A source must make the following reports:

Notifications	
Initial notification	63.9(b)(1)-(2)
Intention to construct/reconstruct	63.9(b)(5), 63.1515(a)(4)
Initial performance test and visible emission observations	63.10(d)(2)
Anticipated and actual date of startup	63.1515(a)(3)
Reschedule initial performance test	63.7(b)(2)
Special compliance obligations for a new source	63.1515(5)

Notifications	
Demonstration of continuous monitoring systems	63.9(g)
Opacity or visible emissions for major sources	63.10(d)(3), 63.1515(a)(6)
Notification of compliance status	63.9(h), 63.1515(b)
Periodic startup, shutdown, malfunction reports	63.10(d)(5)(i)
Operation, maintenance, and monitoring plan for each emission unit to be approved by the permitting authority	63.6(e)(1)-(2)
Semiannual report	63.10(e), 63.1516(b)

A source must keep the following records:

Recordkeeping	
Startup, shutdown, malfunction periods where the continuous monitoring system is inoperative	63.10(b)(2)
Emission test results and other data needed to determine emissions	61.13(g)
All reports and notifications	63.10(b)
Record of applicability	63.10(b)(3)
Records of sources with continuous monitoring systems	63.10(3)
Records are required to be retained for five years	63.10(b)(1), 63.1517

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are not widely used. At this time, it is estimated that 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities	
Read instructions.	
Install, calibrate, maintain, and operate continuous parameter monitors (e.g. temperature monitors), continuous opacity monitors, flow monitors and bag leak detectors, if applicable.	
Perform initial performance test Reference Methods 1, 2, 3, 4, 5, 9, 23, 25A, 26A, test and repeat performance tests if necessary.	
Write the notifications and reports listed above.	

Respondent Activities
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.

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 Online tracking Information System (OTIS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could 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. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into OTIS, which is operated and maintained by the EPA Office of Compliance. OTIS is EPA's 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-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 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 and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (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.

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 101,856 (Total Labor Hours from Table 1 below). 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	\$121.44 (\$57.83 + 110%)
Technical	\$100.23 (\$47.73 + 110%)
Clerical	\$50.51 (\$24.05 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2012, “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 type of industry costs associated with the information collection activities in the subject standard 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 and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Bag leak detectors	\$29,786	0	\$0	\$5,250 ¹	27	\$141,750
Flow meters ²	\$3,000	0	\$0	\$0	0	\$0
Temperature monitors ³	\$1,200	70	\$84,000	\$0	0	\$0
Continuous opacity monitors ⁴	\$36,000	0	\$0	\$7,500	0	\$0
TOTAL			\$84,000			\$141,750

¹ Assume that 34 percent of major sources (or 27 respondents) will use bag leak detectors on fabric filters with an average cost to industry at \$29,786. The actual cost of the bag leak detectors depends on the number of probes on the unit, and O&M costs for bag leak detectors is approximately \$5,250.

² All chlorine injection systems already have chlorine flow meters and the operation and maintenance costs are negligible.

³ Temperature monitors will be installed at new sweat furnaces (70 per year) at a cost of \$1,200. The O&M costs for temperatures monitors are negligible.

- ⁴ Sources with fabric filters will be complying with the monitoring requirements through the use of a bag leak detector or visible emissions observations and not continuous opacity monitors.

The total capital/startup costs for this ICR are \$84,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$141,750. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$225,750. These are recordkeeping costs.

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 \$741,216.

This cost is based on the average hourly labor rate 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), 2012 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 and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (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 1,764 existing respondents will be subject to the standard. It is estimated that an additional 70 respondent per year will become subject. The overall average number of respondents, as shown in the table below, is 1,834 per year.

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

Number of Respondents					
Year	(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)
1	70	1,694	0	0	1,764
2	70	1,764	0	0	1,834
3	70	1,834	0	0	1,904
Average	70	1,764	0	0	1,834

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 1,834.

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
Notification of applicability	70	1	0	70
Notification of construction/reconstruction	0	0	0	0
Notification of actual startup	0	0	0	0
Notification of special compliance requirements	0	0	0	0
Notification of performance test	0	1	0	0
Notification of compliance status	81	1	0	81
Waiver application	0	1	0	0
Semiannual reports	1,764	2	0	3,528
Startup, shutdown, malfunction report	2	1	0	2
			Total	3,681

The number of Total Annual Responses is 3,681.

The total annual labor costs are \$9,862,781. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (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 101,856 at a cost of \$9,862,781. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 28 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$225,750. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 16,448 labor hours at a cost of \$741,216. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal).

6(f) Reasons for Change in Burden

There is an adjustment increase in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The change in the burden and cost estimates occurred because the estimated average number of annual respondents has increased. Additionally, the revised burden and cost estimates reflect updated labor rates available from the Bureau of Labor Statistics.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 28 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-2012-0505. 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) 566-1752, 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 Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2012-0505 and OMB Control Number 2060-0433 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 Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (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. Acquisition, installation, and utilization ^c of technology and systems	54	1	54	70	3,780	189	378	\$420,924.36
4. Reporting requirements								
a. Read instructions ^d	0.13	1	0.13	70	9.10	0.46	0.91	\$1,013.34
b. Required activities								
Initial performance test ^{e,f}	24	1	24	0	0	0	0	\$0
Repeat performance test ^{e,f}	24	0.20	4.80	0	0	0	0	\$0
Operating, maintenance and monitoring plan ^{e,f}	32	1	32	70	2,240	112	224	\$249,436.66
Startup, shutdown, malfunction (SSM) plan ^g	32	1	32	70	2,240	112	224	\$249,436.66
c. Create information	See 4B							
d. Gather existing information	See 4B							
e. Write report								
Notification of applicability ^{e,f}	2	1	2	70	140	7	14	\$15,589.79
Notification of construction/reconstruction	N/A							
Notification/report of actual startup	N/A							
Notification of special compliance Requirements	N/A							
Notification of performance test ^e	2	1	2	0	0	0	0	\$0
Notification of compliance status ^e	4	1	4	81	324	16.2	32.4	\$36,079.23
Waiver application ^h	2	1	2	0	0	0	0	\$0
Report of performance test	See 4B							
Semiannual reports ⁱ	8	2	16	1,764	28,224	1,411.2	2,822.4	\$3,142,901.87
SSM report ^j	8	1	8	2	16	0.8	1.6	\$1,781.69

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
Subtotal for Reporting Requirements					42,519			\$4,117,163.58
5. Recordkeeping requirements								
a. Read instructions	4	1	4	81	324	16.2	32.4	\$36,079.23
b. Plan activities	See 4E							
c. Implement activities	See 4B							
d. Develop record system	N/A							
e. Time to enter/transmit information								
Records of all information required by the standards	N/A							
Major sources ^k	1.5	52	78	81	6,318	315.9	631.8	\$703,545.00
Sweat furnaces ^l	0.5	52	26	1,683	43,758	2,187.9	4,375.8	\$4,872,700.53
f. Time to train personnel ^m	4	1	4	70	280	14	28	\$31,179.58
g. Time to adjust existing ways to comply with previous applicable requirements	N/A							
h. Time to disclose information								
New sources ⁿ	0.25	2	0.5	70	35	1.75	3.5	\$3,897.45
All sources ^o	0.25	2	0.5	1,764	882	44.1	88.2	\$98,215.68
i. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					59,337			\$5,745,617.47
TOTAL LABOR BURDEN AND COST (rounded)					101,856			\$9,862,781

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be 1,764. There are approximately 1,683 sweat furnaces and 81 major sources that are currently subject to the rule. It is estimated that there will be an additional 70 new sweat furnaces subject to the dioxins/furans requirements of the rule based on the number of new sweat furnaces meeting the requirements over the three year period of the ICR. There will be no additional new major sources over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$121.44 per hour for Executive, Administrative, and Managerial labor; \$100.23 per hour for Technical labor, and \$50.51 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2012, 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 it will take each new respondent 54 hours to complete the task. This burden cost is associated with the monitoring of all control equipment ensuring that respondents of new sweat furnaces meet the required specifications of this subpart.

^d We have assumed that it will take each respondent 0.13 hours to read instructions.

^e We have assumed that all existing sources are in compliance with the initial rule requirements. It is further assumed that new sweat furnaces will comply by meeting the equipment specifications rather than by conducting performance tests. Respondents that are major sources are required to demonstrate initial compliance with the applicable emission limit, equipment, work practice, or operational standard for affected source or emission unit and report results in the notification of compliance status report.

^f Since we have assumed that there will be no new sources over the next three-year period of this ICR, there will be no new sources conducting initial performance tests. We have determined that respondents of new sweat furnaces will not be required to conduct emissions testing to show compliance with the emission limit, since it was determined that sweat furnaces sold in the United States now have an afterburner installed and meet the design residence time of 0.8 seconds or greater and an operating temperature of 1600 °F or greater. All new respondents are required to submit for approval an operation, maintenance and monitoring plan for affected sources.

^g We have assumed that respondents of sweat furnaces may submit with the notification of compliance report information on the manufacturers specifications and the SSM plan

^h It is assumed that there will be no new sources requiring a waiver from the performance test requirements.

ⁱ It is assumed that each respondent will take 8 hours to write semiannual report of excess emissions or no excess emissions.

^j It is assumed that two major sources will have a startup, shutdown, malfunction occurrence per year that is not managed according to plan.

^k It is assumed that it will take 1.5 hours for major source respondents to enter and transmit records.

^l It is assumed that it will take 0.5 hours for existing sweat furnaces respondents to enter and transmit records.

^m We have assumed that it will take 4 hours to train new sweat furnaces employees.

ⁿ We have assumed that it will take 0.25 hours to each new sweat furnaces respondent to disclose information.

^o We have assumed that it will take 0.25 hours for each respondent to disclose information.

Table 2: Average Annual EPA Burden and Cost - NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (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
Initial performance tests	40	1.4	56	0	0	0	0	\$0
Report performance test including retesting ^c	48	1	48	0	0	0	0	\$0
Notification of applicability	0.5	1	0.5	70	35	1.75	3.5	\$1,813.78
Notification of construction/reconstruction	N/A							
Notification of actual startup	N/A							
Notification of special compliance requirements	N/A							
Notification of performance test	2	1	2	0	0	0	0	\$0
Notification of compliance status ^d	2	1	2	70	140	7	14	\$7,255.14
Report of performance test ^c	40	1	40	0	0	0	0	\$0
Repeat of performance test report ^c	40	1	40	0	0	0	0	\$0
Semiannual reports ^e	4	2	8	1,764	14,112	705.6	1,411.2	\$731,317.71
Startup, shutdown, malfunction report ^f	8	1	8	2	16	0.8	1.6	\$829.16
Subtotals Labor Burden and cost					14,303	715.15	1,430.3	\$741,215.79
TOTAL ANNUAL BURDEN AND COST (rounded)						16,448		\$741,216

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be 1,764. There are approximately 1,683 sweat furnaces and 81 major sources that are currently subject to the rule. It is estimated that there will be an additional 70 new sweat furnaces subject to the dioxins/furans requirements of the rule based on the number of new sweat furnaces meeting the requirements over the three year period of the ICR. There will be no additional new major 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: \$62.27 Managerial rate (GS-13, Step 5, \$38.92 x 1.6), \$46.21 Technical rate (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 Clerical rate (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2012 General Schedule, which excludes locality rates of pay.

^c We have assumed that all existing respondent are in compliance with the initial rule requirements. It is further assumed that new sweat furnaces will comply by meeting the equipment specification than by conducting performance test.

^d We have assumed that it will take 2 hours for each respondent to complete notification of compliance status.

^e We have assumed that each existing respondent will take 4 hours two times per year to complete the semiannual reports.

^f We have assumed that two major sources will have a startup, shutdown, malfunction occurrence that is not managed according to plan.