SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals--Zinc, Cadmium, and Beryllium (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals--Zinc, Cadmium, and Beryllium (Renewal), EPA ICR Number 2240.04, OMB Control Number 2060-0596.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Polyvinyl Chloride (PVC) and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals--Zinc, Cadmium, and Beryllium were proposed on October 6, 2006, and promulgated on January 23, 2007. These regulations apply to new or existing polyvinyl chloride and copolymer production, (subpart DDDDDD), new and existing primary copper smelters (subpart EEEEEE), new secondary copper smelters (subpart FFFFFF), and new or existing primary zinc production facilities (subpart GGGGGG) that are an area source of hazardous air pollutant (HAP) emissions. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 63, subparts DDDDDD, EEEEEE, FFFFFF, and GGGGGG.

The 2007 final area source rules for PVC and copolymer production in 40 CFR part 63, subpart DDDDDD, and primary beryllium production facilities (part of the primary nonferrous metals category) in sections 63.11165 and 63.11166 of 40 CFR part 63, subpart GGGGGG do not impose any new information collection burden. New and existing PVC and copolymer plants that are area sources are required to comply with the same testing, monitoring, recordkeeping, and reporting requirements as those in the National Emission Standard for Vinyl Chloride (40 CFR part 61, subpart F). The Office of Management and Budget (OMB) has previously approved the information collection requirements in 40 CFR part 61, subpart F (OMB control number 2060-0071, EPA ICR number 0186.10). New and existing primary beryllium production facilities that are area sources are required to comply with the same testing, monitoring, recordkeeping, and reporting requirements as those in the National Emission Standard for Beryllium (40 CFR part 61, subpart C). OMB has previously approved the information collection requirements in 40 CFR part 61, subpart C (OMB control number 2060-0092, EPA ICR number 0193.08). Additionally, sources under subpart DDDDDD are also subject to the NESHAP for PVC and Copolymers Production promulgated on April 17, 2012; the burdens associated with the 2012 rule is covered under EPA ICR number 2454.01 for the two area sources.

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 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 five respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard. Of these five facilities, three are primary copper smelters and two are primary zinc smelters.

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

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 Area Sources: PVC and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (Renewal). The burden to the Federal government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost –NESHAP for Area Sources: PVC and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (Renewal).

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/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 PVC and copolymer, primary copper smelters, secondary copper smelters, and primary zinc production facilities 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, subparts DDDDDD, EEEEEE, FFFFFF, and GGGGGG.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standards ensure compliance with the applicable regulations which where 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 standards. Continuous emission monitors are used to ensure compliance with the standards at all times. During the performance test 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 standards 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, leaks are being detected and repaired, and 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, subparts DDDDDD, EEEEEE, FFFFFF, and GGGGGG.

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, duplication does not exist.

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 63813) on October 17, 2012. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the record-keeping 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.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the American Zinc Association (AZA), at (202) 367-1151, and 2) the International Copper Association, Ltd., at (212) 251-7200.

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 promulgated by OMB under 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 under subpart DDDDDD are owners or operators of new and existing PVC and copolymers that are area sources of HAP. The North American Industry Classification System (NAICS) code 325211 for (Facilities that Polymerize Vinyl Chloride Monomer to Produce PVC and/or Copolymers Products).

The respondents to the recordkeeping and reporting requirements under subpart EEEEEE are owners or operators of new and existing primary copper smelters that are area sources of HAP. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3331, which corresponds to the North American Industry Classification System (NAICS) code 331411 for Primary Smelting and Refining of Copper.

The respondents to the recordkeeping and reporting requirements under subpart FFFFFF

are owners or operators of new secondary copper smelters that are area sources of HAP. The SIC codes for the respondents affected by the standards are SIC 3341 and 3399, which corresponds to NAICS 331423 for Secondary Smelting, Refining, and Alloying of Copper.

The respondents to the recordkeeping and reporting requirements under subpart GGGGGG are owners of operators of new and existing primary zinc smelters that are area sources of HAP. The SIC code for the respondents affected by the standards is SIC 3339, which corresponds to NAICS 331419 for Primary Smelting and Refining of Nonferrous Metal (except copper and aluminum).

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals--Zinc, Cadmium, and Beryllium.

A source must make the following reports:

Notifications	
Notification of applicability	40 CFR 63.9(a)(2)
Notification of construction/ reconstruction	40 CFR 63.9(b)(5)
Notification of special compliance requirements	40 CFR 63.9(d)
Notification of performance test	40 CFR 63.9(c)
Notification of opacity/VE observations	40 CFR 63.9(f)
Additional CMS notifications	40 CFR 63.9(g)
Notification of compliance status	40 CFR 63.9(h)
Notification of changes in information	40 CFR 63.9(j)

Reports	
Monthly emissions summary or quarterly report	63.11147(b), 63.11148(b)
Reports of deviation	63.11162(h)
Semiannual monitoring reports	63.11162(i)
Initial /repeat performance tests	40 CFR 63.7(e)(1) 40 CFR 63.6(h)(7)

A source must keep the following records:

Recordkeeping	
Baghouse and monitoring information (COMS for sintering machine)	40 CFR 63.10
Information to demonstrate compliance: Continuous PM sampler and calculations of daily average emissions or COMS or BLDS (for existing sources) or PM CEMS and calculations of daily average emissions (new sources)	40 CFR 63.10

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 reduced the burden associated with monitoring and recordkeeping at a plant site significantly.

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

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test and repeat performance tests if necessary.
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

Respondent Activities
requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently sources are using monitoring and reporting equipment that provide 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, and 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. 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 EPA's 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 the OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. Both 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/operator for five years.

5(c) Small Entity Flexibility

A 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 in below Table 1: Annual Respondent Burden and Cost – NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (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 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. 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 record-keeping and reporting requirements is estimated to be 46 (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 only costs to the regulated industry resulting from information collection activities required by the subject standards are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in the regulations is labor costs. There are no capital/startup or operation and maintenance 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 $622.

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 Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (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 five existing respondents will be subject to the standard. Of the five respondents, we estimate that there are three primary copper smelters and two primary zinc smelters. There are no existing secondary copper smelters in the U.S. It is estimated that no additional respondents per year will become subject. However, two respondents per year will effect process changes that necessitate initial applicability and compliance status reports. The overall average number of respondents, as shown in the table below is five 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 [1]	(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	2	5	0	2	5
2	2	5	0	2	5
3	2	5	0	2	5
Average	2	5	0	2	5

[1] New respondent include sources with constructed, reconstructed and modified affected facilities.

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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 five.

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
Write Report				
Monitor per Title V permit	5	0	0	0
Notification of initial applicability	2	1	0	2
Initial/repeat performance tests	5	0	0	0
Notification of initial compliance status	2	1	0	2
Reports per Title V permit	5	0	0	0
Total Number of Annual Responses			Total	4

The number of Total Annual Responses is 4.

The total annual labor costs are $4,454. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost –NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (Renewal).

6(e) Bottom Line 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 46 hours at a cost of $4,454. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost –NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 12 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are zero. 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 14

labor hours at a cost of $622. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (Renewal).

6(f) Reasons for Change in Burden

There is no change in labor hours in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden. However, there is an increase in labor costs from the most recently approved ICR due to an adjustment in labor rates. This ICR uses updated labor rates from the Bureau of Labor Statistics to calculate burden costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 12 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 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-2012-0702. 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 Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2012-0702 and OMB Control Number 2060-0596 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 Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year [a]	(E) Technical person-hours per year (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. Reporting requirements								
a. Read instructions [d]	8	1	8	2	16	0.8	1.6	$1,781.65
b. Required activities								
Monitor per Title V permit [c]	2	1	2	0	0	0	0	$0
Initial/repeat performance tests [e]	4	1	4	0	0	0	0	$0
Initial notification of applicability	4	1	4	2	8	0.4	0.8	$890.83
Initial notification of compliance status [f]	8	1	8	2	16	0.8	1.6	$1,781.65
Reports per Title V permit [c]	2	1	2	0	0	0	0	$0
c. Create information	See 3B							
d. Gather existing information	See 3B							
e. Write report	See 3B							
Subtotal for Reporting Requirements					46			$4,454.13
4 Recordkeeping requirements								
a. Read instructions	See 3A							
b. Plan activities	See 3A							
c. Implement activities	See 3A							
d. Record all data required by Title V permit [c]	0.25	1	0.25	0	0	0	0	$0
e. Time to transmit or disclose information [c]	0.25	1	0.25	0	0	0	0	$0

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year [a]	(E) Technical person-hours per year (CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per Year, $[b]
f. Time to train personnel	4	1	4	0	0	0	0	$0
g. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					0			
TOTAL LABOR BURDEN AND COST (rounded)					46			$4,454

Assumptions:

[a] We have assumed that the average number of respondents potentially subject to this rule is five. Each year two respondents are anticipated to effect process changes requiring notification to the Agency regarding applicability and compliance status. There will be no additional new 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 no hours or costs are associated with this burden item because existing plants are already complying with the requirement in their Title V operating permit.

[d] We have assumed that it will take eight hours for each respondent to read instructions.

[e] We have assumed that an existing facility may certify initial compliance based on previous PM test; no new test is required.

[f] We have assumed that it will take eight hours for each respondent to complete the initial notification of compliance status report.

Table 2: Average Annual EPA Burden and Cost –NESHAP for Area Sources: Polyvinyl Chloride and Copolymer Production, Primary Copper Smelting, Secondary Copper Smelting, and Primary Nonferrous Metals—Zinc, Cadmium, and Beryllium (Renewal).

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (AxB)	(D) Respondents per year [a]	(E) Technical person-hours per year (CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per Year, $[b]
Report review								
Initial notification of applicability [c]	2	1	2	2	4	0.2	0.4	$207.29
Initial notification of compliance status [c]	4	1	4	2	8	0.4	0.8	$414.60
Subtotals Labor Burden and cost					12	0.6	1.2	$621.89
TOTAL ANNUAL BURDEN AND COST (rounded)					14			$622

Assumptions:

[a] We have assumed that the average number of respondents potentially subject to this rule will be five. Each year two respondents are anticipated to effect process changes requiring notification to the Agency regarding applicability and compliance status. They are all area sources. There will be no additional new 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 it will take each respondent 2 hours to review the initial notification of applicability report.

[d] We have assumed that it will take each respondent 4 hours to review the initial notification of compliance status report.