

Supporting Statement

ENVIRONMENTAL PROTECTION AGENCY

NSPS for Lead-Acid Battery Manufacturing (40 CFR part 60, subpart KK) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Lead-Acid Battery Manufacturing (40 CFR Part 60, Subpart KK) (Renewal),
EPA ICR Number 1072.10, OMB Control Number 2060-0081

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Lead-Acid Battery Manufacturing were proposed on January 14, 1980, promulgated on April 16, 1982, and amended on October 17, 2000. These regulations apply to the following affected facilities in lead-acid battery manufacturing plants with production capacity that is equal to, or exceeds 6.5 tons of lead: grid casting facilities, paste mixing facilities, three-process operation facilities, lead-oxide manufacturing facilities, lead reclamation facilities, and other lead-emitting operations, commencing construction, modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 60, subpart KK.

In general, all NSPS 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 NSPS.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two 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 each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 52 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard.

The Office of Management and Budget (OMB) approved the currently active ICR without any "Terms of Clearance."

The respondents to this ICR (the "Affected Public") are publicly owned and operated lead-acid battery manufacturing plants. None of the facilities are owned by either state, local and tribal agencies or the Federal government. The burden to respondents is calculated below in

Table 1: Annual Respondent Burden and Cost – NSPS for Lead-Acid Battery Manufacturing (40 CFR Part 60, Subpart KK) (Renewal). Since this regulation only affects the lead-acid battery manufacturing industry, the “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractor. This burden is calculated below in Table 2: Average Annual EPA Burden and Cost – NSPS for Lead-Acid Battery Manufacturing (40 CFR Part 60, Subpart KK) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

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

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

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

In addition, section 114(a) states that the Administrator may require any owner/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, lead emissions from lead-acid battery manufacturing plants either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart KK.

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 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 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 check if the pollution control devices are properly installed and operated and the standard is being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

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

The requested recordkeeping and reporting are required under 40 CFR part 60, subpart KK.

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 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 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. We estimate that there are 52 existing respondents subject to the reporting requirements of this standard, and that no new sources will become subject to the standards over the three-year period covered by this ICR.

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 reviewed previously to determine the minimum information needed for compliance

purposes. For this renewal, we contacted: 1) the Advanced Lead Acid Battery Consortium (ALABC), at (919) 361-4674; and 2) the Battery Council International (BCI), at (202) 719-4107. EPA did not receive any comments from the consultations.

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 with 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 lead acid battery manufacturing plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3691 for Storage Batteries, which corresponds to the North American Industry Classification System (NAICS) code 335911 for Storage Battery Manufacturing.

4 (b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Lead Acid Battery Manufacturing (40 CFR Part 60, Subpart KK).

A source must make the following reports:

Notifications	
Notification of construction/reconstruction	60.7(a)(1)
Notification of initial startup	60.7(a)(3)
Notification of initial performance test	60.8(d)
Physical or operational change	60.7(a)(4)

Reports	
Report opacity results (reported with the initial performance test results) and at other times opacity observations are required	60.11(e)
Report of performance test results	60.8(a)
Periodic reports if using continuous emissions monitoring systems (e.g., semiannual)	60.7(c) 60.7(e)

A source must keep the following records:

Recordkeeping	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	60.7(b)
Performance test records	60.7(d)
Pressure drop monitoring records for sources using a scrubber system	60.7(e), 60.373
Maintain records for at least two years	60.7(f)

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 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 a monitoring device that measures pressure drop across the scrubbing system every 15 minutes.
Perform initial performance test using Reference Method 12 to determine lead concentration and volumetric flow rate, and Reference Method 9 for opacity readings, 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 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 results, 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 might inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. 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. 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 two years.

5(c) Small Entity Flexibility

There are no small entities (i.e. small businesses) affected by this regulation. The information available on the Lead-Acid Battery Manufacturing sector indicates that small operations are being bought by larger facilities. It was assumed for this ICR that none of the existing sources is a small entity.

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 – NSPS for Lead-Acid Battery Manufacturing (40 CFR Part 60, Subpart KK) (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 record-keeping and reporting requirements is estimated to be 4,053 hours (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 NSPS program, the previously-approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$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 monitors 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 Costs, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M Costs, (E X F)
Pressure Drop Monitors ¹	\$ 0	0	0	\$ 900	13	\$ 11,700

It is estimated that 25 percent of the 52 existing sources (i.e., 13 sources) have scrubber systems and are, therefore, required to install and maintain a monitor to measure and record pressure drop across the scrubbing system.

There are no capital/startup costs for this ICR. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$ 11,700. 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 \$11,700. These are the costs of recordkeeping.

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 \$4,687.

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 – NSPS for Lead-Acid Battery Manufacturing (40 CFR Part 60, Subpart KK) (Renewal).

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, approximately 52 existing respondents will be subject to the standards on an average year over the next three years. It is estimated that no additional

respondents per year will become subject. The overall, average number of respondents, as shown in the table below, is 52 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	0	13	39	0	52
2	0	13	39	0	52
3	0	13	39	0	52
Average	0	13	39	0	52

To avoid double-counting respondents column D is subtracted. As shown above, the average Number of Respondents over the three year period of this ICR is 52.

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 ¹	(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 initial performance test	0	1	0	0
Notification of construction / reconstruction	0	1	0	0
Notification of initial startup	0	1	0	0
Semi-annual Report	13	2	39	65
			Total	65

¹ Because we do not anticipate any new sources to become subject to the NSPS, so no initial performance tests or notifications are incorporated in the count of responses. The information available on the sector indicates that facilities are closing operations or are that small operations are being bought by larger facilities, so we have also assumed that there will be no significant process changes triggering NSPS, subpart KK, applicability.

The number of total annual responses is 65.

The total annual labor costs are \$392,422. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Lead-Acid Battery Manufacturing (40 CFR Part 60, Subpart KK) (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 4,053 hours at a cost of \$392,422. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Lead- Acid Battery Manufacturing (40 CFR Part 60, Subpart KK) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 62 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$11,700. 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 104 labor hours at a cost of \$4,687. See Table 2 below: Average Annual EPA Burden and Cost – NSPS for Lead-Acid Battery Manufacturing (40 CFR Part 60, Subpart KK) (Renewal).

6(f) Reasons for Change in Burden

There is no change in the labor hours in this ICR compared to the previous ICR. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) 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 the total respondent labor costs as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The change in cost estimates reflects updated labor rates available from the Bureau of Labor Statistics.

There is a slight decrease in the annual O&M cost from the previous ICR due to rounding. The previous ICR estimated an O&M cost of \$11,700 but rounded the figure to the nearest thousand, or \$12,000. This ICR presents a more-accurate cost figure by not rounding the O&M costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 62 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-2012-0656. 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-2012-0656 and OMB Control Number 2060-0081 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 – NSPS for Lead-Acid Battery Manufacturing (40 CFR Part 60, Subpart KK) (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 (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements	Included in 3B							
A. Read Instructions	Included in 3B							
B. Required Activities	Included in 3B							
New Sources	Included in 3B							
Initial performance test ^c	20.87	1	20.87	0	0	0	0	\$0
Repeat performance test ^d	20.87	1	20.87	0	0	0	0	\$0
New and Existing Sources	Included in 3B							
Monitoring of emissions and operations	Included in 4E							
C. Create information	Included in 3B							
D. Gather existing information	Included in 3E							
E. Write Report	Included in 3E							
New Sources	Included in 3B							
Notification of construction/reconstruction/ Modification	1.74	1	1.74	0	0	0	0	\$0
Notification of initial startup	1.74	1	1.74	0	0	0	0	\$0
Notification of CMS demonstration	1.74	1	1.74	0	0	0	0	\$0
Notification of initial performance test	1.74	1	1.74	0	0	0	0	\$0
Report of performance test	Included in 3B							
New and Existing Sources	Included in 3B							
Semiannual reports ^e	13.91	2	27.83	13	361.74	18.09	36.17	\$40,280.73
Subtotal for Reporting Requirements					416			\$40,280.73
4. Recordkeeping requirements	Included in 3A							
A. Read instructions	Included in 3A							
B. Plan activities	Included in 4E							
C. Implement Activities	Included in 4E							
D. Develop record system	N/A							
E. Time to enter information	N/A							
Records monitoring of emissions and operations ^f	0.64	365	238.04	13	3,094.56	154.73	309.46	\$344,589.03
Records of startups, shutdowns, malfunctions, etc.	1.30	1	1.30	52	67.83	3.39	6.78	\$7,552.64
F. Train Personnel	N/A							
G. Audits	N/A							

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 (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost Per year ^b
Subtotal for Recordkeeping Requirements						3,637		\$352,141.67
TOTAL LABOR BURDEN AND COST (rounded)						4,053		\$392,422

Assumptions:

- ^a We have assumed that there are approximately 52 sources currently subject to NSPS, subpart KK. We have assumed that there will be no new sources over the period of this ICR. Therefore, the average number of respondents per year is estimated to be 52.
- ^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 All sources are required to use Method 9 for opacity observations, except for lead oxide manufacturing facilities. All respondents would have to perform Method 12 to calculate the lead concentration and the volumetric flow rate of the effluent gases. It requires at least three runs of 60 minutes and 0.85 dscm.
- ^d We have assumed that 20 percent of initial performance tests must be repeated due to failure.
- ^e Semiannual reports are required by this rule for those sources that have to install continuous monitoring systems (e.g., pressure drop monitors across the scrubbing systems). We have assumed that 25% of the sources (i.e., 13 sources) have scrubbing systems.
- ^f Monitoring of emissions and operations requirements includes pressure drop measurements across the scrubbing system at least every 15 minutes, if applicable. We have assumed that 25% of the sources (i.e., 13 sources) have scrubbing systems.

Table 2: Average Annual EPA Burden and Cost – NSPS for Lead-Acid Battery Manufacturing (40 CFR Part 60, Subpart KK) (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
New Sources								
Notification of construction/reconstruction	1.74	1	1.74	0	0	0	0	\$0
Notification of initial startup	0.87	1	0.87	0	0	0	0	\$0
Notification of CMS demonstration	0.87	1	0.87	0	0	0	0	\$0
Notification of Initial Performance Test	0.43	1.2	0.52	0	0	0	0	\$0
Initial Performance Test	20.87	1	20.87	0	0	0	0	\$0
Repeat of Performance Test ^c	20.87	0.2	4.17	0	0	0	0	\$0
Review Performance Test results ^c	6.96	1.2	8.35	0	0	0	0	\$0
New and Existing Sources								
Review of Semi-annual Reports ^d	2	1	6.96	13	90.43	4.52	9.04	\$4,686.74
Subtotals Labor Burden and cost						103.99		\$4,686.74
TOTAL ANNUAL BURDEN AND COST (rounded)						104		\$4,687

Assumptions:

^a We have assumed that there are approximately eighty-nine respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years. Within those eighty-nine existing sources, only seventy-six are subject to the emission limits in the standard. The remaining thirteen respondents are permitted as synthetic minors and, therefore, are not subject to the emission limits in the standard.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 for Managerial (GS-13, Step 5, \$38.92 x 1.6), \$46.21 for Technical (GS-12, Step 1, \$28.88 x 1.6) and \$25.01 Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) "2011 General Schedule" which excludes locality rates of pay.

^c We have assumed that 20 percent of initial performance tests is typically repeated due to failure.

^d We have assumed that 25 percent of the 52 existing sources (i.e., 13 sources) have scrubber systems and are therefore, required to install and maintain a monitor to measure and record pressure drop across the scrubbing system, and submit semi-annual reports.