

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for the Secondary Lead Smelter Industry (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for the Secondary Lead Smelter Industry (40 CFR Part 63, Subpart X) (Renewal), EPA ICR Number 1686.10, OMB Control Number 2060-0296.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the regulations published at 40 CFR Part 63, Subpart X were proposed on June 9, 1994; promulgated on June 13, 1997; and amended on June 13, 1997; January 5, 2012; and January 3, 2014. The most recent amendment corrected typographical errors and provided clarification of compliance dates and monitoring requirements. None of the revisions affected the reporting and recordkeeping requirements reflected in the previous information collection request (ICR). These regulations apply to existing facilities and new facilities that operate furnaces to reduce scrap lead metal and lead compounds to elemental lead. Specifically, the rule applies to secondary lead smelters that use blast, reverberatory, rotary, or electric smelting furnaces to recover lead metal from scrap lead, primarily from used lead-acid automotive-type batteries. 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, Subpart X.

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.

Over the next three years, an average of 14 respondents per year 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. No additional respondents are expected to become subject to the standard. 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 United States Environmental Protection Agency (EPA) regional office. 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.

The Office of Management and Budget (OMB) approved the currently active 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/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 metal, lead metal compound, and organic hazardous air pollutant (HAP) emissions (i.e., total hydrocarbons (THC) and dioxins and furans emissions) from secondary lead smelting processes 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 X.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in the standard ensures 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.

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 pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that 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. Nonduplication, Consultations, and Other Collection Criteria**

#### **3(a) Nonduplication**

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, 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 (79 FR 30117) on May 27, 2014. The Agency received one public comment in the docket; the commenter opposed any new regulation or rule changes to the NESHAP. This ICR renewal will not result in any regulatory changes.

#### **3(c) Consultations**

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 recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS), which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data.

Consultations with industry representatives (i.e., respondents) also were conducted to determine if there is any way for EPA to reduce the recordkeeping and reporting burden or improve the language in the standard to make it easier to comply. In developing this ICR, we contacted the RSR Corporation at (214) 631-6070 and the ENVIRON Corporation at (770) 874-5010.

#### **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 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 (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 owners or operators of secondary lead smelting facilities. The United States Standard Industrial Classification (SIC) code for respondents affected by the standard is 3341 (Secondary Smelting and Refining of Nonferrous Metals), which corresponds to the North American Industry Classification System (NAICS) code 331492 (Secondary Lead Smelting and Refining).

### **4(b) Information Requested**

#### **(i) Data Items**

In this ICR, all the data that is recorded or reported is required by the NESHAP for the Secondary Lead Smelter Industry (40 CFR Part 63, Subpart X).

A source must make the following notifications:

<b>Notifications</b>	
Application for approval of construction/reconstruction	63.5(d) and (f)
Notification of applicability	63.549(a), 63.9(b)(2)
Notification of intention to construct/reconstruct	63.549(a), 63.9(b)(4)(i), 63.9(b)(5)(i)
Notification of actual startup date	63.549(a), 63.9(b)(4)(v), 63.9(b)(5)(ii)
Notification that source is subject to special compliance requirements	63.549(a), 63.9(d)
Notification of performance test	63.7(b), 63.9(e)
Notification of opacity and visible emission observations	63.549(a), 63.9(f)
Demonstration of continuous monitoring system	63.549(a), 63.9(g)
Notification of compliance status	63.549(a), 63.9(h)
Standard operating procedures manuals for fugitive dust controls and baghouses	63.549(b)

A source must make the following reports:

<b>Reports</b>	
Performance test results, including opacity CMS data	63.550(a), 63.550(d), 63.10(d)(2), 63.10(e)(4)
Opacity or visible emission observations results	63.550(a), 63.550(d), 63.10(d)(3)
CMS performance evaluation results	63.550(a), 63.550(d), 63.10(e)(2)
Excess emissions and CMS performance and summary reports	63.550(a), 63.550(d), 63.10(e)(3)

A source must keep the following records:

<b>Recordkeeping</b>	
Records of all reports and notifications	63.10(b)(1)
Records of applicability determinations	63.10(b)(3)
Records for sources with CMS	63.10(c)
Records retention for five years (most recent two years must be kept on-site)	63.550(a) and (c)
Records of standard operating procedures manuals for fugitive dust controls and baghouses	63.550(b)
Records of bag leak detection system outputs and alarms, including baghouse inspection, maintenance, and corrective actions	63.550(c)(1-3)
Records of parametric monitoring data, including system inspection, maintenance, and calibration	63.550(c)(4-10)
Records of startups, shutdowns, malfunctions, or periods where the CMS is inoperative	63.550(c)(11-13), 63.10(b)(2)

### Electronic Reporting

The NESHAP requires that any performance test performed after December 31, 2011 be submitted electronically to EPA's Central Data Exchange by using the Electronic Reporting Tool (ERT) for test methods that are compatible with ERT. This new requirement to submit the data to the ERT (established as part of the 2012 amendment) is in addition to other existing submission requirements for this data.

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**

<b>Respondent Activities</b>
Read instructions.
Install, operate, and maintain baghouses according to the standard operating procedures

<b>Respondent Activities</b>
manual, and consistent with the manufacturer's instructions.
Monitor and record pressure drop and liquid supply pressure at the wet scrubber at least once every hour when using this control device for controlling particulate matter and metal HAP emissions from a process fugitive source.
Install, calibrate, maintain, and operate CMS for temperature monitoring of the afterburner or the combined blast furnace and reverberatory furnace exhaust streams when complying with the total hydrocarbon emission standard.
Install, calibrate, maintain, and operate a total hydrocarbon CMS for measuring emissions when complying with the total hydrocarbon emission standard.
Equip pressurized drying bleaching seals with an alarm to determine seal malfunctions.
Perform initial performance tests and repeat performance tests if necessary.
Use referenced test methods in Appendix A, Part 60, to determine compliance with the emission standards for lead compounds (e.g., methods 1, 2, 3, 4, and 12); total hydrocarbons (e.g., methods 1, 3B, 4, and 25A); and dioxins and furans (e.g., methods 1, 2, 3A, 4, and 23).
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 and reporting equipment that provide parameter data in an automated way (e.g., continuous parameter monitoring systems). 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.

<b>Agency Activities</b>
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. 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 five years.

### 5(c) Small Entity Flexibility

The Small Business Administration defines a small entity engaging in secondary lead smelting operations as a firm having no more than 700 employees. Approximately 81 percent of the facilities subject to the regulation do not meet the definition of a small entity. The impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. In 2011, EPA conducted an economic impact analysis and found that the rule would



not impose a significant impact on a substantial number of small entities.

#### **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 the Secondary Lead Smelter Industry (40 CFR Part 63, Subpart X) (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. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

#### **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 13,038 (Total Labor Hours from Table 1). 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	\$128.06 (\$60.98 + 110%)
Technical	\$101.05 (\$48.12 + 110%)
Clerical	\$51.37 (\$24.46 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, “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 (O&M) costs

are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(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 Sources with O&M	(G) Total O&M, (E X F)
THC testing	\$0	0	\$0	\$4,700	30	\$141,000
Dioxin/furan testing	\$0	0	\$0	\$19,300	0	\$0
Lead testing <sup>1</sup>	\$0	0	\$0	\$10,000	12	\$120,000
Continuous particulate monitor <sup>2</sup>	\$0	0	\$0	\$7,500	14	\$105,000
Differential pressure monitor	\$2,300	0	\$0	\$230	40	\$9,200
HEPA filter monitor	\$32,759	0	\$0	\$4,665	0	\$0
Total			\$0			\$375,200

<sup>1</sup> There are 23 (rounded) affected sources at 14 facilities that need to conduct annual lead stack testing (or 1.63 sources per facility). However, we assume all facilities will apply for an extension to test once every 24 months (i.e., an average 12 sources per year).

<sup>2</sup> We assume all existing facilities have CPMs.

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$375,200. 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 \$375,200.

**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 \$35,905.

This cost is based on the average hourly labor rate as follows:

Managerial	\$62.90 (GS-13, Step 5, \$39.31 + 60%)
Technical	\$46.67 (GS-12, Step 1, \$29.17 + 60%)
Clerical	\$25.25 (GS-6, Step 3, \$15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2014 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 the Secondary Lead Smelter Industry (40 CFR Part 63, Subpart X) (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 14 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject.

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

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(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	14	0	0	14
2	0	14	0	0	14
3	0	14	0	0	14
Average	0	14	0	0	14

<sup>1</sup> New respondents include sources with constructed, reconstructed, and modified affected facilities.

<sup>2</sup> Column D is subtracted to avoid double-counting respondents.

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
(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
Semiannual report	14	2	0	28
Annual report	14	1	0	14
Differential pressure monitoring	14	1	0	14
Work practice SOP	0	1	0	0
			Total	56

The number of Total Annual Responses is 56.

The total annual labor costs are \$1,276,433. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for the Secondary Lead Smelter Industry (40 CFR Part 63, Subpart X) (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 13,038. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for the Secondary Lead Smelter Industry (40 CFR Part 63, Subpart X) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 233 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$375,200. 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 789 labor hours at a cost of \$35,905. See Table 2: Average Annual EPA Burden and Cost – NESHAP for the Secondary Lead Smelter Industry (40 CFR Part 63, Subpart X) (Renewal).

**6(f) Reasons for Change in Burden**

There is a decrease of 7,499 hours in the total estimated respondent burden compared with the ICR currently approved by OMB. The currently approved burden is the cumulative burden and cost from EPA ICR Number 1686.09 (2012 amendment) and EPA ICR Number 1686.07 (existing rule). In this ICR renewal, we have made adjustments to reflect current rule requirements and removed duplicate items contained in previous ICRs. In addition, this ICR renewal reflects a decrease in the number of respondents from 16 to 14 due to facility closures. These changes resulted in an overall decrease in burden hours for both respondents and the Agency, as well as an overall decrease in respondent capital/startup and O&M costs.

**6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 233 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-2014-0055. 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 William Jefferson Clinton 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) 566-1927. 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-2014-0055 and OMB Control Number 2060-0296 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 the Secondary Lead Smelter Industry (40 CFR Part 63, Subpart X) (Renewal)**

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions	20	1	20	0	0	0	0	0
B. Required activities								
Annual performance test	330	1	330	14	4,620	231	462	520,165.80
THC testing	10	1	10	30	300	15	30	33,777.00
Dioxin/furan testing	10	1	10	0	0	0	0	0
Lead testing	10	0.5	5	23	115	6	12	12,948
Continuous particulate monitor	1	52	52	14	728	36.4	72.8	81,965.52
Differential pressure monitor	2	1	2	40	80	4	8	9,007.20
Inspect capture hoods	8	1	8	14	112	5.6	11.2	12,610.08
Inspect and repair enclosures	20	1	20	14	280	14	28	31,525.2
Inspect battery storage areas	20	1	20	14	280	14	28	31,525.2
Revise SOP manual <sup>c</sup>	20	1	20	1	20	1	2	2,251.8
C. Create information	See 3B							
D. Gather information	See 3E							
E. Report preparation								
Semiannual report	16	2	32	14	448	22.4	44.8	50,440.32
Annual report	10	1	10	14	140	7	14	15,762.6
Differential pressure monitoring report	10	1	10	14	140	7	14	15,762.6
Work practice SOP	40	1	40	0	0	0	0	0
<b>Reporting Subtotal</b>						<b>8,352.5</b>		<b>817,741</b>

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>
1. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Implement activities	N/A							
C. Develop record system	N/A							
D. Record information								
Fugitives	1	12	12	14	168	8.4	16.8	18,915.12
Flow weighted averages for lead	1	1	1	14	14	0.7	1.4	1,576.26
Continuous pressure monitors	1	12	12	14	168	8.4	16.8	18,915.12
Power outages	1	12	12	14	168	8.4	16.8	18,915.12
Facility enclosure inspections	1	12	12	14	168	8.4	16.8	18,915.12
Startup and shutdown periods	1	12	12	14	168	8.4	16.8	18,915.12
Malfunctions	2	6	12	14	168	8.4	16.8	18,915.12
Actions taken during malfunctions	1	6	6	14	84	4.2	8.4	9,457.56
Bag Leak Detection System	1	12	12	14	168	8.4	16.8	18,915.12
Furnace inspections	1	12	12	14	168	8.4	16.8	18,915.12
Plastic battery casing material recovery	1	6	6	14	84	4.2	8.4	9,457.56
Monitoring parameters, performance tests, and periodic inspections	3.5	52	182	14	2,548	127.4	254.8	286,879.32
E. Personnel training	8	1	8	0	0	0	0	0
F. Time for audits	N/A							
<b>Recordkeeping Subtotal</b>						<b>4,685.1</b>		<b>458,692</b>
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED)</b>						<b>13,038</b>		<b>1,276,433</b>
Capital and O&M Cost								375,200
<b>GRAND TOTAL</b>								<b>1,651,633</b>

**Assumptions:**

<sup>a</sup> EPA estimates an average of 14 existing facilities and no new facilities per year will be subject to the NESHAP over the next 3 years.

<sup>b</sup> This ICR uses the following labor rates: \$101.05 (technical), \$128.06 (managerial), and \$51.37 (clerical). These rates are from the



United States Department of Labor, Bureau of Labor Statistics, March 2014, “Table 2. Civilian workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<sup>c</sup> EPA assumes each facility will make one major adjustment per year. In each instance, the SOP must be revised.

<sup>d</sup> We assume the following performance testing will occur at the 14 subject facilities: THC testing for 30 sources (required annually), D/F testing for 20 sources (required once every 6 years, will not occur during the 3-year period of this ICR), lead testing for 23 sources (required annually, but assume all facilities will apply for an extension to test once every 24 months).

**Table 2: Average Annual EPA Burden and Cost – NESHAP for the Secondary Lead Smelter Industry (40 CFR Part 63, Subpart X) (Renewal)**

Burden item	A	B	C	D	E	F	G	H
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>
1. Applications	N/A							
2. Read and understand rule requirements	40	1	40	0	0	0	0	0
3. Required activities								
A. Observe stack tests <sup>c</sup>	48	1	48	3	144	7.2	14.4	7,536.96
B. Excess emissions - enforcement activities <sup>d</sup>	24	1	24	1	24	1.2	2.4	1,256.16
C. Create information	N/A							
D. Gather information	N/A							
E. Report reviews								
Semiannual report	10	2	20	14	280	14	28	14,655.2
Annual report	10	1	10	14	140	7	14	7,327.6
Differential pressure monitoring report	3	1	3	14	42	2.1	4.2	2,198.28
Work practice SOPs	10	1	10	0	0	0	0	0
F. Prepare annual summary report <sup>e</sup>	56	1	56	1	56	2.8	5.6	2,931.04
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED)</b>						<b>789</b>		<b>35,905</b>

**Assumptions:**

- <sup>a</sup> EPA estimates an average of 14 existing facilities and no new facilities per year will be subject to the NESHAP over the next 3 years.
- <sup>b</sup> This ICR uses the following labor rates: \$46.67 (technical), \$62.90 (managerial), and \$25.25 (clerical). These rates are from the Office of Personnel Management (OPM), 2014 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.
- <sup>c</sup> EPA assumes Agency personnel will attend 20% of facility stack tests (0.2 x 14 = 3, after rounding).

<sup>d</sup> EPA assumes 10% of facilities will have excess emissions ( $0.1 \times 14 = 1$ , after rounding).

<sup>e</sup> EPA assumes state and EPA personnel will require 4 technical hours per respondent when preparing the annual summary report ( $14 \times 4 = 56$ ).