

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Aluminum, Copper and Other Non-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ) (Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Aluminum, Copper and Other Non-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ) (Renewal), EPA ICR Number 2332.04, OMB Control Number 2060-0630.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Aluminum, Copper and Other Non-ferrous Metals Foundries were proposed on February 9, 2009, promulgated on June 25, 2009, and revised on September 10, 2009. These regulations apply to existing and new facilities conducting melting operations located at an aluminum, copper, or other non-ferrous foundry that is an area source of hazardous air pollutants (HAP) emissions, melts 600 tons per year (tpy) of aluminum, copper, or other non-ferrous metal or greater, and uses material that contains or has the potential to emit HAP for which the source category was listed. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart ZZZZZZ.

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 United States Environmental Protection Agency (EPA) regional office.

The “Affected Public” is private sector businesses that operate aluminum, copper and other non-ferrous metals foundries. The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Aluminum, Copper and Other Non-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by either federal employees or government contractors; this burden is found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Aluminum, Copper and Other Non-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ) (Renewal).

Based on our consultations with industry representatives, there is an average of one affected facilities 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, approximately 318 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.”

## **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 aluminum, copper and other non-ferrous metal foundries either 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 ZZZZZZ.

### **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 leaks are being detected and repaired and the standard 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. Nonduplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart ZZZZZZ.

#### **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 (80 FR 32116) on June 5, 2015. 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 Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations

with the Agency's internal industry experts. Approximately 318 respondents will be subject to the standard 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 previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the American Foundry Society, at (800) 537-4237; and 2) the Non-Ferrous Founders' Society, at (847) 299-0950.

We received comments from the Non-Ferrous Founders' Society (NFFS). The trade organization indicated that several facilities have closed in the past few years, but did not provide a quantitative estimate on number of closures. In addition, the NFFS indicates that several facilities may not be properly identified within the NAICS codes designated for aluminum, copper and other non-ferrous metals foundries. The organization suggest that many companies producing nonferrous metal castings are not properly categorized within these codes and some facilities included in the codes may not in fact be non-ferrous foundries. The NFFS indicates that the error in facility classification within the NAICS codes may have led to a difference in the actual number of affected facilities as compared to the estimated number of affected facilities in this ICR. The organization states that a change in the number of affected facility would have greater impacts on industry burden than the increased labor rates and required time cited in this ICR. To remedy this issue, the NFFS has offered to review the list of facilities under the relevant NAICS codes to ensure their accuracy if desired by the Agency.

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 (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 and operators of aluminum, copper and other non-ferrous metals foundries. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, and the corresponding North American Industry Classification System (NAICS) codes, are listed below.

<b>Standard (40 CFR Part 63, Subpart ZZZZZZ)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Aluminum Foundries Except Die Casting	3365	331524
Copper Foundries Except Die Casting	3366	331529
Other Nonferrous Foundries Except Die Casting	3369	331528

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

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

In this ICR, all the data that is recorded or reported is required by the NESHAP for Aluminum, Copper and Other Non-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ).

A source must make the following reports:

<b>Notifications</b>	
Notification of applicability	63.11550(a)
Notification of performance tests	63.11555
Notification of compliance status	63.11553(b)
Performance test for copper foundries and other non-ferrous foundries of 600 tpy or greater of metal melt production	63.11551(a)
Periodic observations of fabric filter exhausts for existing melting operations subject to the PM limit	63.11552(b)
BLDS for fabric filters for new melting operations subject to a PM limit	63.11552(c)

<b>Reports</b>	
Management practices plan for aluminum, copper, and other non-ferrous foundries	63.11550(a)
Startup, shutdown, and malfunction plan/reports	63.11555
Performance test plan	63.11555
Compliance report if deviation occurs	63.11553(e)

A source must keep the following records:

<b>Recordkeeping</b>	
Records to document compliance with management practices plan	63.11552(a), 63.11553(c)(2)
Records to support notifications	63.11553(c)(1)
Records of monitoring data	63.11553(c)(3)
Records of metal melt production for copper and non-ferrous foundries less than 600 tpy	63.11553(c)(4)
Records of bag leak detection system	63.1553(c)(5)

### 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.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 5, 5D, and 17 tests, 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.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

## **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>
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 Enforcement and Compliance History Online (ECHO) and ICIS.

### **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 reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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 majority of the respondents are small entities (i.e., small businesses). A small entity for this industry is defined by the Small Business Administration as a firm having no more than 500 employees; therefore, 98 percent of the aluminum foundries, 100 percent of the copper foundries, and 100 percent of the other non-ferrous foundries are small entities. The standard excludes two thirds (648) of the 966 foundries from regulation. Only the largest copper and other non-ferrous foundries (23 total) are subject to emission standards; approximately 318 foundries are required to comply with management practices. Of the 318 foundries that are subject to the rule, approximately 307 (97 percent) are small entities. The standard provides the maximum degree of operational flexibility for small entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. Our analyses show that the standard will not result in a significant economic impact on a substantial number of small entities because the only new requirements will be compliance provisions. The total annual cost for each of the affected small entities is less than 0.05 percent of company sales revenues.

### **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 Aluminum, Copper and Other Non-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ) (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.



The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 11,900 (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	\$129.93 (\$61.87+ 110%)
Technical	\$103.97 (\$49.51 + 110%)
Clerical	\$51.79 (\$24.66 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 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 only costs to the regulated industry resulting from information collection activities required by the subject standard 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 cost. 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 \$13,300.

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 Aluminum, Copper and Other Non-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ) (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 318 existing respondents will be subject to the standard. 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 318 per year.

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

Number of Respondents					
	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	318	0	0	318
2	0	318	0	0	318
3	0	318	0	0	318
Average	0	318	0	0	318

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities. In this standard existing respondents submit initial notifications.

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 318.

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
Notification of applicability	0	1	0	0
Notification of compliance status	0	1	0	0
Notification of performance test	0	1	0	0
Site specific test plan	0	1	0	0
Management practices plan	0	1	0	0
Startup, shutdown, and malfunction plan/reports	0	1	0	0
Semiannual compliance reports	31.8	2	0	63.6
			Total	64

The number of Total Annual Responses is 64 (rounded).

The total annual labor costs are \$1,200,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Aluminum, Copper and Other Non-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ) (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 below, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 11,900 at a cost of \$1,200,000. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost – Table 1: Annual Respondent Burden and Cost - NESHAP for Aluminum, Copper and Other Non-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of

information is estimated to average 186 hours per response.

There are no annual capital/startup and O&M costs to the regulated entity.

### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 293 labor hours at a cost of \$13,300. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Aluminum, Copper and Other Non-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

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

There is an increase in the respondent labor hours in this ICR compared to the previous ICR. This is due to assuming all sources will have to re-familiarize with regulatory requirements each year. This also results in an increase in labor costs for the respondents. In addition, there is an increase in labor costs for both the respondents and the Agency due to an increase 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 186 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-2011-0526. 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) 566-1927. 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-2011-0526 and OMB Control Number 2060-0630 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 Aluminum, Copper and Other Non-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ) (Renewal)**

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent	(C) Person-hours per respondent (C=A*B)	(D) Respondents per year <sup>b</sup>	(E) Technical person-hours per year (E=C*D)	(F) Management person-hours per year (F=E*0.05)	(G) Clerical person-hours per year (G=E*0.1)	(H) Cost <sup>c</sup> , \$
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Familiarize with Regulatory Requirements	4	1	4	318	1,272	63.6	127.2	\$146,719.48
B. Required activities								
Prepare management practices plan	4	1	4	0	0	0	0	\$0
Initial performance tests	40	1	40	0	0	0	0	\$0
Daily VE (30 days) then weekly VE <sup>c, d</sup>	0.1	78	7.8	23	179.4	8.97	17.94	\$20,692.98
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Initial notification of applicability	4	1	4	0	0	0	0	\$0
Notification of compliance status	4	1	4	0	0	0	0	\$0
Notification of construction/reconstruction	N/A							
Notification of anticipated startup	N/A							
Notification of actual startup	N/A							
Notification of special compliance requirements	N/A							
Request for compliance extension	N/A							

Notification of performance test	1	1	1	0	0	0	0	\$0
Site specific test plan	4	1	4	0	0	0	0	\$0
Notification of performance evaluation	N/A							
Quality assurance plan for CEMS/COMS	N/A							
NESHAP waiver request	N/A							
Startup, shutdown, and malfunction plan/reports	4	1	4	0	0	0	0	\$0
Semiannual compliance reports <sup>e</sup>	8	2	16	31.8	508.8	25.44	50.88	\$58,687.79
<b>Subtotal for Reporting Requirements</b>						<b>2,254</b>		<b>\$226,100</b>
5. Recordkeeping Requirements								
A. Familiarize with Regulatory Requirements	See 4A							
B. Plan activities	See 4A							
C. Implement activities	See 4A							
D Develop record system	4	1	4	0	0	0	0	\$0
E. Time to enter information	0.5	52	26	318	8,268	413.4	826.8	\$953,676.59
F. Time to transmit or disclose information	0.25	2	0.5	318	159	7.95	15.9	\$18,339.93
G. Time to adjust existing ways	2	1	2	0	0	0	0	\$0
F. Time to train personnel	4	1	4	0	0	0	0	\$0
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>9,691</b>		<b>\$972,017</b>
<b>TOTAL LABOR BURDEN AND COST (rounded <sup>h</sup>)</b>						<b>11,900</b>		<b>\$1,200,000</b>
<b>Capital and O&amp;M Costs <sup>f</sup></b>								<b>\$0</b>
<b>Grand TOTAL <sup>f</sup></b>								<b>\$1,200,000</b>

**Assumptions:**

<sup>a</sup> This ICR uses the following labor rates: \$123.93 per hour for Executive, Administrative, and Managerial labor; \$103.97 per hour for Technical labor, and \$51.79 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% to account for the benefit packages available to those employed by private industry.

<sup>b</sup> We have assumed that 318 foundries will be subject to the rule and will perform these activities over the 3-year term of the ICR.

<sup>c</sup> We have assumed that all of the 23 foundries subject to the PM emission limit must perform the visible emissions observations over the 3-year term of the ICR.

<sup>d</sup> This activity is based on daily VE for 30 days and weekly thereafter ( $30 + 335/7 = 78$ ).

<sup>e</sup> Semiannual compliance reports are required when deviations occur. We estimate that 10 percent of the foundries will experience deviations.

<sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



**Table 2: Average Annual EPA Burden and Cost – NESHAP for Aluminum, Copper and Other Non-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ) (Renewal)**

<b>Burden Item</b>	<b>(A) Person hours per occurrence</b>	<b>(B) No. of occurrences per respondent</b>	<b>(C) Plants per year</b>	<b>(D) Technical person- hours per year (D=A*B*C)</b>	<b>(E) Management person- hours per year (F=E*0.05)</b>	<b>(F) Clerical person- hours per year (G=E*0.1)</b>	<b>(G) Cost<sup>a</sup>, \$</b>
Report Review:							
Initial notification of applicability	1	1	0	0	0	0	\$0
Startup, shutdown, malfunction plan/report	2	1	0	0	0	0	\$0
Notification of compliance status	2	1	0	0	0	0	\$0
Semiannual excess emissions report <sup>b</sup>	4	2	31.8	254.4	12.72	25.44	\$13,315.3
<b>TOTAL BURDEN AND COST (rounded <sup>c</sup>)</b>					<b>293</b>		<b>\$13,300</b>

**Assumptions:**

<sup>a</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$62.90 (GS-13, Step 5, \$39.31 x 1.6), Technical rate of \$46.67 (GS-12, Step 1, \$29.17 x 1.6), and Clerical rate of \$25.25 (GS-6, Step 3, \$15.78 x 1.6). These rates are from the Office of Personnel Management (OPM) 2014 General Schedule which excludes locality rates of pay.

<sup>b</sup> Semiannual compliance reports are required when deviations occur. We estimate that 10 percent of the foundries will experience deviations.

<sup>c</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.