

Table 1: Annual Respondent Burden and Cost – NESHAP for Aluminum, Copper and Other No

103.97 123.93

| 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 ^b | (E) Technical person-hours per year (E=C*D) | (F) Management person-hours per year (F=E*0.05) |
|---|------------------------------------|--|--|--|--|--|
| 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 |
| B. Required activities | | | | | | |
| Prepare management practices plan | 4 | 1 | 4 | 0 | 0 | 0 |
| Initial performance tests | 40 | 1 | 40 | 0 | 0 | 0 |
| Daily VE (30 days) then weekly VE ^{c,d} | 0.1 | 78 | 7.8 | 23 | 179.4 | 8.97 |
| 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 |
| Notification of compliance status | 4 | 1 | 4 | 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 |
| Site specific test plan | 4 | 1 | 4 | 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 |
| Semiannual compliance reports ^e | 8 | 2 | 16 | 31.8 | 508.8 | 25.44 |
| Subtotal for Reporting Requirements | | | | | | 2,254 |
| 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 |
| E. Time to enter information | 0.5 | 52 | 26 | 318 | 8,268 | 413.4 |
| F. Time to transmit or disclose information | 0.25 | 2 | 0.5 | 318 | 159 | 7.95 |

| | | | | | | |
|--|-----|---|---|---|---|---------------|
| G. Time to adjust existing ways | 2 | 1 | 2 | 0 | 0 | 0 |
| F. Time to train personnel | 4 | 1 | 4 | 0 | 0 | 0 |
| G. Time for audits | N/A | | | | | |
| Subtotal for Recordkeeping Requirements | | | | | | 9,691 |
| TOTAL LABOR BURDEN AND COST (rounded^f) | | | | | | 11,900 |
| Capital and O&M Costs | | | | | | |
| Grand TOTAL | | | | | | |

Assumptions:

^aThis ICR uses the following labor rates: \$123.93 per hour for Executive, Administrative, and Managerial labor; \$103.97 per hour for Technical labor; and \$61.97 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2014, "Table 2. Civilian Occupational and Industry group." The rates are from "column 1, Total Compensation." The rates have been increased by 110% to account for inflation available to those employed by private industry.

^bWe have assumed that 318 foundries will be subject to the rule and will perform these activities over the 3-year term of the ICR.

^cWe 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.

^dThis activity is based on daily VE for 30 days and weekly thereafter ($30 + 335/7 = 78$).

^eSemiannual compliance reports are required when deviations occur. We estimate that 10 percent of the foundries will experience deviations over the 3-year term of the ICR.

^fTotals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

n-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ) (Renewal)

51.79

| (G) Clerical person- hours per year (G=E*0.1) | (H) Cost ^a , \$ |
|--|-------------------------------|
| | |
| | |
| | |
| | |
| 127.2 | \$146,719.48 |
| | |
| 0 | \$0 |
| 0 | \$0 |
| 17.94 | \$20,692.98 |
| | |
| | |
| | |
| 0 | \$0 |
| 0 | \$0 |
| | |
| | |
| | |
| | |
| 0 | \$0 |
| 0 | \$0 |
| | |
| | |
| | |
| 0 | \$0 |
| 50.88 | \$58,687.79 |
| | \$226,100 |
| | |
| | |
| | |
| 0 | \$0 |
| 826.8 | \$953,676.59 |
| 15.9 | \$18,339.93 |

| | |
|---|--------------------|
| 0 | \$0 |
| 0 | \$0 |
| | |
| | \$972,017 |
| | \$1,200,000 |
| | \$0 |
| | \$1,200,000 |

186 hr/resp

technical labor, and \$51.79 per
 civilian Workers, by
 amount for the benefit packages

3-year term of the ICR.

ions.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Aluminum, Copper and U

46.67 62.9

| Burden Item | (A) Person hours per occurrence | (B) No. of occurrences per respondent | (C) Plants per year | (D) Technical person-hours per year (D=A*B*C) | (E) Management person-hours per year (F=E*0.05) |
|--|--|---|---------------------------|---|---|
| Report Review: | | | | | |
| Initial notification of applicability | 1 | 1 | 0 | 0 | 0 |
| Startup, shutdown, malfunction plan/report | 2 | 1 | 0 | 0 | 0 |
| Notification of compliance status | 2 | 1 | 0 | 0 | 0 |
| Semiannual excess emissions report ^b | 4 | 2 | 31.8 | 254.4 | 12.72 |
| TOTAL BURDEN AND COST (rounded^c) | | | | | 293 |

Assumptions:

^a This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government: 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 3, \$15.78 x 1.6). These rates are from the Office of Personnel Management (OPM) 2014 General Schedule which excludes lo

^b Semiannual compliance reports are required when deviations occur. We estimate that 10 percent of the foundries will experie

^c Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Other Non-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ) (Renewal)

25.25

| (F) Clerical person-hours per year (G=E*0.1) | (G) Cost, \$ |
|---|-------------------------|
| | |
| 0 | \$0 |
| 0 | \$0 |
| 0 | \$0 |
| 25.44 | \$13,315.3 |
| | \$13,300 |

ent overhead expenses:
rate of \$25.25 (GS-6, Step
ality rates of pay.

ence deviations.