

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (Renewal), EPA ICR Number 1767.07, OMB Control Number 2060-0360.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Primary Aluminum Reduction Plants were proposed on September 26, 1996, promulgated on October 7, 1997, and most-recently amended on November 2, 2005. Additional amendment to the rule were proposed in December 2011 and December 2014. The burden for the proposed amendments (residual risk and technology review) are addressed separately in EPA ICR Number 2447.01, and will be combined with this ICR after publication of the final rule, in the next ICR renewal period.

These regulations apply to owner or operator of the affected facilities which include new or existing potlines, paste production plants, or anode bake furnaces associated with primary aluminum production and located at a major source, and for each new pitch storage tank associated with a primary aluminum reduction plant. 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 LL.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

The 16 major source facilities in the United States, which are the respondents in this ICR, are publicly-owned and operated by primary aluminum reduction plants. None of the facilities are owned by either state, local, tribal agencies, or the Federal government. The “burden” to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (Renewal).

The Federal Government “burden” is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (Renewal).

Over the next three years, we estimate 16 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. However, we expect that one existing source per year will undergo reconstruction. A detailed industry analysis is currently being conducted as part of the residual risk and technology review; information from this analysis will be incorporated into the next ICR renewal.

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

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, hydrogen fluoride (HF), polycyclic organic matter (POM), and particulate matter smaller than 10 microns in diameter (PM₁₀) emissions from primary aluminum reduction plants either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart LL.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards 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 standards. 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 these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the 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. Non-duplication, Consultations, and Other Collection Criteria

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

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 (78 FR 35023) on June 11, 2013. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data

sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standards as they were being developed and the standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Aluminum Association, at (703) 358-2960, and the South East Center for Aluminum Technology, at (859) 514-4989.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976;

amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are primary aluminum reduction plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3334 which corresponds to the North American Industry Classification System (NAICS) code 331312 for Primary Production of Aluminum.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL).

A source must make the following reports:

Notifications	
Notification and application of construction/reconstruction.	63.05
Notification of initial compliance status.	63.850(a)(6)
Notification of compliance approach.	63.850(a)(8)
Initial notification when source becomes subject to standard.	63.9(b) and 63.850(a)
One-time notification for each affected source of the intent to use an HF continuous emission monitor.	63.850(a)(7)
Performance test results/reports.	63.10(d)(2), 63.850(a)(5) and 63.850(b)
Initial performance test.	63.07(b) and 63.09(e)
Rescheduled initial performance test.	63.07(b)(2)
Demonstration of continuous monitoring system, if applicable.	63.09(g)
Compliance status including excess emissions report.	63.09(h)

Reports	
Opacity or visible emissions.	63.10(d)(3), 63.845(h),and 63.845(i)
Periodic startup, shutdown, malfunction reports and, if applicable, implementation plan.	63.10(d)(5)(I) and 63.850(c)
Semiannual reports are required for periods of operation during which measured emissions exceed an applicable limit. If control device operating parameters are outside of the established ranges, quarterly reports are required as a result of excess emissions.	63.850(d)

A source must keep the following records:

Recordkeeping	
Startup, shutdown, malfunction periods where the continuous monitoring system is inoperative.	63.10(b)(2)
Emission test results and other data needed to determine emissions.	63.13(g)
All reports and notifications.	63.10(b)
A copy of the startup, shutdown, and malfunction plan and if applicable, of the implementation plan for emissions averaging.	63.850(e)(4)
Record of applicability.	63.10(b)(3)
Records for sources with continuous monitoring systems (CEMS) if they were used.	63.10(b)(3)
Records are required to be retained for five years. The most recent two years of records must be retained at the facility.	63.850(e)(1-2)
Aluminum production rate and anode production.	63.850(e)(4)
Records associated with an owner or operator request to monitor similar potlines, to perform reduced sampling, or to establish and alternative limit for an HF CEM system.	63.850(e)(4)
Design information for paste production plant capture systems and alternative control devices.	63.850(e)(4)
Emissions values from process and control devices.	63.850(e)(4)
Documentation that daily inspections of process and control devices were performed and corrective action(s) taken as required.	63.850(e)(4)

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

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for dry alumina scrubbers, dry coke scrubbers, wet scrubbers, electrostatic precipitators and wet roof scrubbers. If approved by the appropriate regulatory agency, a respondent may install, calibrate, maintain, and operate an HF CMS for the monitoring of TF secondary emissions as an alternative method.
Perform initial performance test, Reference Method 1, 2, 3, 13A or 13B, 14 or 14A, 315 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.

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. 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

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden,

the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (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 80,100 (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$123.04 (\$58.59+ 110%)
Technical	\$101.22 (\$48.20 + 110%)
Clerical	\$51.18 (\$24.37 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2013, “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 standards 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 monitor(s) 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 Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
HF CEMs (similar potlines)	\$100,000	0	\$0	\$1,669	16	\$26,704
Method 14 (manifolds at potlines) ¹	\$200,000	0	\$0	\$3,339	12	\$40,068
Method 14A (alcan cassettes)	\$92,000	0	\$0	\$1,536	16	\$24,576
TOTAL (rounded)						\$91,300

¹ Assumes that 12 potlines must perform manual sampling as a result of the NESHAP. Testing was already required by the states for other potlines.

Note: Total has been rounded to 3 significant digits. Figures may not add exactly due to rounding.

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 \$91,300. 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 \$91,300.

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 \$11,300.

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), 2013 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 Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (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 16 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject, but one existing respondent per year will reconstruct its facility. The overall average number of respondents, as shown in the table below, is 16 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	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports		
1	1	16	0	1	16
2	1	16	0	1	16
3	1	16	0	1	16
Average	1	16	0	1	16

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

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 16.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of applicability	1	1	N/A	1
Notification of construction/reconstruction	1	1	N/A	1
Notification of actual startup	1	1	N/A	1
Notification of initial performance test	1	1	N/A	1
Notification of compliance status/approach	1	1	N/A	1
Semiannual report of monitoring exceedances	1.6	2	N/A	3.2
Semiannual report of no excess emissions	14.4	2	N/A	28.8
Startup, shutdown, malfunction report	1.6	2	N/A	3.2
TOTAL				40.2

The number of Total Annual Responses is 40.

The total annual labor costs are \$7,830,000 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (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 and summarized below in Tables 1 and 2, respectively.

(i) Respondent Tally

The total annual labor hours are 80,100 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (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 2,000 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$91,300. 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 250 labor hours at a cost of \$11,300. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (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 no significant change in burden 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. The apparent decrease in respondent burden is due to a mathematical correction. The previous ICR incorrectly summed the number of recordkeeping hours. In addition, there is a small decrease in the capital and O&M cost due to rounding.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 2,000 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-2013-0348. 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), WJC 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-2013-0348 and OMB Control Number 2060-0360 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 Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (Renewal)

Reporting/Recordkeeping Requirements	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (AxB)	(D) Respondents per year	(E) Technical person-hours per year (CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost (\$) ^a
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Familiarization with regulatory requirements ^b								
New Sources	4	1	4	1	4	0.2	0.4	\$449.96
Existing Sources	2	1	2	16	32	1.6	3.2	\$3,599.68
B. Required activities								
Acquisition, Installation, and Utilization of Technology and Systems ^b	8	1	8	1	8	0.4	0.8	\$899.92
Initial performance test ^{b,c}	100	1	100	1	100	5	10	\$11,249.00
Annual performance test ^{c, d, e}	100	5.1	510	16	8,160	408	816	\$917,918.40
Monthly performance test (Method 13/14) ^{f, g}	200	12	2400	12	28,800	1,440	2,880	\$3,239,712.00
Monthly performance test	40	18	720	16	11,520	576	1,152	\$1,295,884.80
(CEM or Alcan cassette) ^{h, i}								
Quarterly performance test ^{j, k, l}	200	16	3200	2	6,400	320	640	\$719,936.00
Daily Monitoring	2	365	730	16	11,680	584	1,168	\$1,313,883.20
C. Create information	See 4B							
D. Gather existing information	See 4B							

Reporting/Recordkeeping Requirements	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (AxB)	(D) Respondents per year	(E) Technical person-hours per year (CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost (\$) ^a
E. Write report	See 4B							
Notification of applicability ^b	2	1	2	1	2	0.1	0.2	\$224.98
Notification of construction/reconstruction ^b	2	1	2	1	2	0.1	0.2	\$224.98
Notification of actual startup ^b	2	1	2	1	2	0.1	0.2	\$224.98
Notification of special compliance requirements	N/A							
Notification of performance test ^b	2	1	2	16	32	1.6	3.2	\$3,599.68
Notification of compliance status ^b	4	1	4	16	64	3.2	6.4	\$7,199.36
NESHAP waiver application	N/A							
Report of performance test	See 4B							
Report of monitoring exceedances ^{m, n}	16	2	32	1.6	51.2	2.56	5.12	\$5,759.49
Report of no excess emissions ^{m, o}	8	2	16	14.4	230.4	11.52	23.04	\$25,917.70
Startup, shutdown, malfunction plan ^{m, p}	8	2	16	1.6	25.6	1.28	2.56	\$2,879.74
Startup, shutdown, malfunction plan ^b	0	1	0	1	0	0	0	\$0.00
<i>Reporting Subtotal</i>					77,143			\$7,545,964.19
4. Recordkeeping Requirements								
A. Read instructions	See 4B							
B. Plan activities	N/A							
C. Implement activities	See 4B							
D. Develop record system	N/A							
E. Time to enter information								
Records of all information required by standards ^q	3	52	156	16	2,496	124.8	249.6	\$280,775.04

Reporting/Recordkeeping Requirements	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (AxB)	(D) Respondents per year	(E) Technical person-hours per year (CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost (\$) ^a
F. Time to train personnel	N/A							
G. Time to adjust existing ways to comply with previously applicable requirements	N/A							
H. Time to transmit or disclose information ^{m, r}	0.25	2	0.5	16	8	0.4	0.8	\$899.92
I. Time for audits	N/A							
<i>Recordkeeping Subtotal</i>						2,880		\$281,674.96
TOTAL ANNUAL BURDEN AND COST (Rounded)						80,100		\$7,830,000
Capital and O&M Cost								\$91,300
Grand Total (Rounded)								\$7,920,000

Note: Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

Assumptions:

^a This ICR uses the following labor rates: \$123.04 for managerial labor, \$101.22 for technical labor, and \$51.18 for clerical labor. These rates are from the U.S. Department of Labor, Bureau of Labor Statistics, March 2013. The rates have been increased by 110 percent to account for overhead.

^b Assumes that one plant per year will have to comply with initial rule requirements due to a reconstruction of an affected facility (i.e., pitch storage tank). It is assumed that the plant has a startup, shutdown, and malfunction plan in place.

^c Assumes it takes 100 hours each for Method 13 and Method 315 for primary controls of potlines and bake furnaces.

^d Assumes 59 Method 13 tests and 22 Method 315 tests will be conducted each year (primary control systems) for a total of 81 tests for 16 respondents (81/16 = 5.1 per respondent).

^e Assumes that there are 16 primary aluminum plants subject to this standard.

^f Assumes it takes 200 hours for Method 13/14 for secondary emissions from potlines.

^g Assumes that 12 potlines must perform manual sampling as a result of the NESHAP. Testing was already required by the states for other potlines.

^h Assumes it takes 40 hours for testing of similar potlines (CEM or Alcan cassette).

ⁱ Assumes that 24 potlines will be monitored under the alternative monitoring provisions for similar potlines. This is 18 per respondent (24×12/16 = 18).

^j Assumes it takes 200 hours for a Method 315 test for secondary emissions.

^k Assumes that a total of 8 Soderberg potlines at two plants. This is 16 per respondent (8×4/2 = 16).

- ^l Assumes that two Soderberg plants will conduct quarterly performance tests.
- ^m This rule requires that all existing respondents submit semiannual reports. Performance test results will be submitted with the semiannual reports.
- ⁿ Assumes that 10 percent fail to meet the standard ($0.1 \times 16 = 1.6$).
- ^o Assumes that 90 percent meet the standard ($0.9 \times 16 = 14.4$).
- ^p Assumes that 10 percent must file startup, shutdown, malfunction report ($0.1 \times 16 = 1.6$).
- ^q Assumes it takes 3 hours per week per plant to enter monitoring data into records.
- ^r Assumes it takes 15 minutes to transmit recorded information.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant-year (AxB)	(D) Plants per year	(E) Technical person- hours per year (Cx D)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	Cost ^a (\$)
New or reconstructed facilities								
Notification of applicability ^b	2	1	2	1	2	0.1	0.2	\$103.65
Notification of construction and reconstruction ^b	2	1	2	1	2	0.1	0.2	\$103.65
Notification of actual startup ^b	2	1	2	1	2	0.1	0.2	\$103.65
Notification of special compliance requirements	N/A							
Notification of initial performance test ^b	2	1	2	1	2	0.1	0.2	\$103.65
Notification of compliance status ^b	8	1	8	1	8	0.4	0.8	\$414.60
Existing facilities								
Review of performance test report ^c	8	1	8	16	128	6.4	12.8	\$6,633.54
Review of excess emissions report ^d	8	1	8	1.6	12.8	0.64	1.28	\$663.35
Review of no excess emissions report ^e	2	2	4	14.4	57.6	2.88	5.76	\$2,985.09
Review of NESHAP waiver application	N/A							
Review of startup, shutdown, malfunction report ^f	2	1	2	1.6	3.2	0.16	0.32	\$165.84
TOTAL ANNUAL BURDEN (rounded)						250		\$11,300

Note: Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

Assumptions:

^a This ICR uses the following average hourly labor rates: \$62.27 for managerial (GS-13, Step 5, \$38.92 × 1.6), \$46.21 (GS-12, Step 1, \$28.88 × 1.6) for technical and \$25.01 (GS-6, Step 3, \$15.63 × 1.6) for clerical. These rates are from the Office of Personnel Management (OPM) “2013 General Schedule” which excludes locality rates of pay.

^b Assumes that one plant per year over the next three years will install a new or reconstructed pitch storage tank.

^c Assumes that EPA/state personnel will review summary of performance tests requirements to be submitted by all 16 existing plants on an annual basis for

purposes of calculating the burden. However, plants are expected to submit performance test results with the semiannual reports.

^d Assumes that 10 percent of the 16 plants ($0.1 \times 16 = 1.6$) will have excess emissions.

^e Assumes that the remaining 90 percent of the 16 plants ($0.9 \times 16 = 14.4$) will not have excess emissions.

^f Assumes that 10 percent of plants per year ($0.1 \times 1.6 = 1.6$) will report a startup, shutdown, malfunction incident.