

Public comment from Aleris on the ICR for NESHAP Subpart SSSS

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Aleris has reviewed the Supporting Statement for the NESHAP Subpart SSSS renewal and have the following comments:

1. In Section 6(b)(ii) of the Supporting Statement the following is indicated: "The annual operating and maintenance costs are the ongoing costs to maintain the monitor and other costs, such as photocopying and postage". An Annual O&M Cost for One Respondent is listed as \$48. If maintenance of continuous temperature measuring monitors is to be included in this category, then an annual cost of \$1,200 per responded would be appropriate for Aleris facilities because we replace temperature sensors each calendar quarter to maintain calibration requirements.
2. In Table 1, Section 3.D (Gathering existing information) no cost is associated with this Burden Item, nor are costs associated with Section 4.B referenced by Section 3.D. However, Aleris expends 60 hours per year per respondent in gathering information to show compliance with 40 CFR Part 63.5150(a)(4), which is then evaluated when completing the required semi-annual report.