

Table 1: Annual Respondent Burden and Cost – NESHAP for the Secondary Lead Smelter I

| Burden item | (A) Person-hours per occurrence | (B) Annual occurrences per respondent | (C) Person-hours per respondent per year (A x B) |
|--|--|--|---|
| 1. Applications | N/A | | |
| 2. Surveys and studies | N/A | | |
| 3. Reporting requirements | | | |
| A. Familiarization with the regulatory requirements ^a | 1 | 1 | 1 |
| B. Required activities ^c | | | |
| Annual performance test | 330 | 1 | 330 |
| THC testing | 10 | 1 | 10 |
| Dioxin/furan testing | 10 | 1 | 10 |
| Lead testing | 10 | 0.5 | 5 |
| Continuous particulate monitor | 1 | 52 | 52 |
| Differential pressure monitor | 2 | 1 | 2 |
| Inspect capture hoods | 8 | 12 | 96 |
| Inspect and repair enclosures | 20 | 12 | 240 |
| Inspect battery storage areas | 8 | 52 | 416 |
| Revise SOP manual ^d | 20 | 1 | 20 |
| C. Create information | See 3B | | |
| D. Gather information | See 3E | | |
| E. Report preparation | | | |
| Notification of performance test ^e | 2 | 2 | 4 |
| Semiannual compliance report | 16 | 2 | 32 |
| Annual (performance test) report ^e | 10 | 2 | 20 |
| Differential pressure monitoring report ^f | 10 | 1 | 10 |
| Reporting Subtotal | | | |
| 1. Recordkeeping requirements | | | |
| A. Familiarization with the regulatory requirements | See 3A | | |
| B. Implement activities | N/A | | |
| C. Develop record system | N/A | | |
| D. Record information | | | |
| Fugitives | 1 | 12 | 12 |
| Flow weighted averages for lead | 1 | 1 | 1 |
| Continuous particulate monitor | 1 | 52 | 52 |
| Differential pressure monitors | 1 | 12 | 12 |
| Power outages | 1 | 12 | 12 |
| Facility enclosure inspections | 1 | 12 | 12 |
| Startup and shutdown periods | 1 | 12 | 12 |
| Malfunctions | 2 | 6 | 12 |
| Actions taken during malfunctions | 1 | 6 | 6 |
| Bag Leak Detection System | 1 | 12 | 12 |

Industry (40 CFR Part 63, Subpart X) (Renewal)

| (D) Respondents per year ^a | (E) Technical hours per year (C x D) | (F) Management hours per year (E x 0.05) | (G) Clerical hours per year (E x 0.10) | (H) Annual cost (\$) ^b |
|---|---|---|---|--------------------------------------|
| | | | | |
| | | | | |
| 12 | 12 | 0.6 | 1.2 | 1,511.14 |
| | | | | |
| 12 | 3,960 | 198 | 396 | 498,676.86 |
| 12 | 120 | 6 | 12 | 15,111.42 |
| 2 | 20 | 1 | 2 | 2,518.57 |
| 6 | 30 | 1.5 | 3 | 3,777.86 |
| 12 | 624 | 31.2 | 62.4 | 78,579.38 |
| 24 | 48 | 2.4 | 4.8 | 6,044.57 |
| 12 | 1,152 | 57.6 | 115.2 | 145,069.63 |
| 12 | 2,880 | 144 | 288 | 362,674.08 |
| 12 | 4,992 | 249.6 | 499.2 | 628,635.07 |
| 1 | 20 | 1 | 2 | 2,518.57 |
| | | | | |
| | | | | |
| | | | | |
| 12 | 48 | 2.4 | 4.8 | 6,044.57 |
| 12 | 384 | 19.2 | 38.4 | 48,356.54 |
| 12 | 240 | 12 | 24 | 30,222.84 |
| 12 | 120 | 6 | 12 | 15,111.42 |
| | 16,848 | | | 1,844,853 |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| 12 | 144 | 7.2 | 14.4 | 18,133.70 |
| 12 | 12 | 0.6 | 1.2 | 1,511.14 |
| 12 | 624 | 31.2 | 62.4 | 78,579.38 |
| 24 | 288 | 14.4 | 28.8 | 36,267.41 |
| 12 | 144 | 7.2 | 14.4 | 18,133.70 |
| 12 | 144 | 7.2 | 14.4 | 18,133.70 |
| 12 | 144 | 7.2 | 14.4 | 18,133.70 |
| 12 | 144 | 7.2 | 14.4 | 18,133.70 |
| 12 | 72 | 3.6 | 7.2 | 9,066.85 |
| 12 | 144 | 7.2 | 14.4 | 18,133.70 |

| | | | | |
|----|-------|---------------|-------|------------------|
| 12 | 144 | 7.2 | 14.4 | 18,133.70 |
| 12 | 72 | 3.6 | 7.2 | 9,066.85 |
| 12 | 2,184 | 109.2 | 218.4 | 275,027.84 |
| 0 | 0 | 0 | 0 | 0 |
| | | | | |
| | | 4,899 | | 536,455 |
| | | 21,700 | | 2,380,000 |
| | | | | 251,000 |
| | | | | 2,630,000 |

be subject to the NESHAP over the next 3 years. In addition to the 12 active subject to the standard will have to familiarize with the regulatory requirements each tup, intention to construct/reconstruct, notification of applicability and notification of

rates are from column 1, "Total compensation." They have been increased by 110 sources conduct lead tests each year. The ICR estimates that all sources have all sources have continuous particulate monitors. the visible emission observation must be revised.

7.

Labor Rates

| | |
|--------------------|--------|
| TECH | 112.98 |
| MGMT | 149.35 |
| CLER | 54.81 |
| Source Type | |
| Existing | 12 |
| New | 0 |

Monthly requirement per 63.544(d)
Monthly requirement per 63.544(d)
Weekly requirement per 63.545(c)(4)

Note - removed work practice SOP line item as it wasn't in the SS table of reports and I didn't find it in the rule

255 hours per response

22.82

: language "Work practice SOP". Previously there were no respondents.

Table 2: Average Annual EPA Burden and Cost – NESHAP for the Secondary Lead Sn

| Burden item | (A) EPA person-hours per occurrence | (B) Annual occurrences per respondent | (C) EPA person- hours per respondent per year (A x B) |
|---|--|--|--|
| 1. Applications | N/A | | |
| 2. Required activities | | | |
| A. Observe stack tests ^c | 48 | 1 | 48 |
| B. Excess emissions - enforcement activities ^d | 24 | 1 | 24 |
| C. Create information | N/A | | |
| D. Gather information | N/A | | |
| E. Report reviews | | | |
| Notification of performance test | 3 | 2 | 6 |
| Semiannual report | 10 | 2 | 20 |
| Annual report | 10 | 2 | 20 |
| Differential pressure monitoring report | 3 | 1 | 3 |
| F. Prepare annual summary report ^e | 4 | 12 | 48 |
| TOTAL ANNUAL BURDEN AND COST (ROUNDED)^f | | | |

Assumptions:

^a EPA estimates an average of 12 existing facilities and no new facilities per year will be subject to the NESHA

^b This ICR uses the following labor rates: \$48.08 (technical), \$64.80 (managerial), and \$26.02 (clerical). These excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages

^c EPA assumes Agency personnel will attend 20% of facility stack tests (0.2 x 20 tests on average across the

^d EPA assumes 10% of facilities will have excess emissions (0.1 x 12 = 1, after rounding).

^e EPA assumes state and EPA personnel will require 4 technical hours per respondent when preparing the ar

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

Relter Industry (40 CFR Part 63, Subpart X) (Renewal)

| (D) Respondents per year ^a | (E) Technical hours per year (C x D) | (F) Management hours per year (E x 0.05) | (G) Clerical hours per year (E x 0.10) | (H) Annual cost (\$) ^b |
|---|---|---|---|--|
| | | | | |
| 4 | 192 | 9.6 | 19.2 | 10,353.02 |
| 1 | 24 | 1.2 | 2.4 | 1,294.13 |
| | | | | |
| | | | | |
| 12 | 72 | 3.6 | 7.2 | 3,882.38 |
| 12 | 240 | 12 | 24 | 12,941.28 |
| 12 | 240 | 12 | 24 | 12,941.28 |
| 12 | 36 | 1.8 | 3.6 | 1,941.19 |
| 1 | 48 | 2.4 | 4.8 | 2,588.26 |
| | | 980 | | 45,900 |

..P over the next 3 years.

.. rates are from the Office of Personnel Management (OPM), 2017 General Schedule, which is available to government employees.

.. : 12 facilities = 4, after rounding).

.. annual summary report (12 x 4 = 48).

Labor Rates

TECH 48.08

MGMT 64.8

CLER 26.02

| Number of Respondents | | | | | |
|------------------------------|----------------------------------|---------------------------------------|---|---|---|
| | Respondents That Submit Reports | | Respondents That Do Not Submit Any Reports | | |
| Year | (A) Number of New Respondents | (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 | 12 | 0 | 0 | 12 |
| 2 | 0 | 12 | 0 | 0 | 12 |
| 3 | 0 | 12 | 0 | 0 | 12 |
| Average | 0 | 12 | 0 | 0 | 12 |

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

*Revised from 14 to 12 to match latest source inventory per Nathan Topham

| 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 Performance Test | 12 | 2 | 0 | 24 |
| Semiannual compliance report | 12 | 2 | 0 | 24 |
| Annual (performance test) report | 12 | 2 | 0 | 24 |
| Differential pressure monitoring report | 12 | 1 | 0 | 12 |
| Revised SOP | 1 | 1 | 0 | 1 |
| | | | Total | 85 |

Capital/Startup and O&M Costs (taken directly from prev ICR burden tables, columns B, C, and K)

| Burden item | Stack Testing Cost Per Occurrence* | Other Non-Labor Costs Per Occurrence* | Annual occurrences per respondent | Respondents per year ^a |
|---|------------------------------------|---------------------------------------|-----------------------------------|-----------------------------------|
| THC testing | \$4,700 | | 1 | 12 |
| Dioxin/furan testing | \$19,300 | | 1 | 2 |
| Lead testing | \$10,000 | | 1 | 6 |
| Differential pressure monitor (initial capital) | | \$2,300 | 1 | 0 |
| Differential pressure monitor (annual O&M) | | \$230 | 1 | 12 |
| HEPA filter monitor (initial capital) | | \$32,759 | 1 | 0 |
| HEPA filter monitor (annual O&M) | | \$4,665 | 1 | 0 |

*Costs in red were tallied as O&M in prev ICR.

Rows highlighted in blue denote new items added to burden calculations.

| Capital/Startup vs. Operation and Maintenance (O&M) Costs | | | | |
|--|---|---------------------------|-------------------------------------|-------------------------------------|
| (A) | (B) | (C) | (D) | (E) |
| Continuous Monitoring Device | Capital/Startup Cost for One Respondent | Number of New Respondents | Total Capital/Startup Cost, (B X C) | Annual O&M Costs for One Respondent |
| THC testing | \$0 | 0 | \$0 | \$4,700 |
| Dioxin/furan testing ¹ | \$0 | 0 | \$0 | \$19,300 |
| Lead testing ² | \$0 | 0 | \$0 | \$10,000 |
| Continuous particulate monitor ³ | \$0 | 0 | \$0 | \$7,500 |
| Differential pressure monitor ⁴ | \$2,300 | 0 | \$0 | \$230 |
| HEPA filter monitor | \$32,759 | 0 | \$0 | \$4,665 |
| Total | \$35,059 | | \$0 | \$46,395 |

1 Dioxin/Furan testing occurs every 6 years, or 12 facilities/6 years = 2 facilities per year.

2. Lead testing is required annually, but there are provisions by which facilities can apply for an extension. This ICR ass for an extension to test once every 24 months. 12 facilities/2 years = 6 facilities per year conducting lead testing.

3. EPA has assumed that all faciilites will have CPMs.

4. EPA has assumed that each facility will have two differential pressure monitors.

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

ars notes

test occurs every 6 years so assume 2 respondents per year

lead testing is every year with the option for requesting an extension to every 24 months, or 6 sources per year

| (F) | (G) |
|--------------------------------|--------------------|
| Number of Respondents with O&M | Total O&M, (E X F) |
| 12 | \$56,400 |
| 2 | \$38,600 |
| 6 | \$60,000 |
| 12 | \$90,000 |
| 24 | \$5,520 |
| 0 | \$0 |
| | \$251,000 |

changed to match latest facility inventory

required every 6 years, so 12 sources/6 years = 2. This should not have been z

changed to match latest facility inventory, divided by 2 per note about extensi

changed to match latest facility inventory

change this to 24, assuming two differential pressure monitors per facility.

umes all facilities will apply

zero previously.

on