

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

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 ^c	4	1	4	0	0	0
Initial performance tests ^c	40	1	40	0	0	0
Daily VE (30 days) then weekly VE ^{d,e}	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 ^c	4	1	4	0	0	0
Notification of compliance status ^c	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 ^c	1	1	1	0	0	0
Site specific test plan ^c	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 ^c	4	1	4	0	0	0
Semiannual compliance reports ^f	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 ^c	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 train personnel ^c	4	1	4	0	0	0
H. Time for audits	N/A					
Subtotal for Recordkeeping Requirements						9,691
TOTAL LABOR BURDEN AND COSTS (rounded)^g						11,900
TOTAL CAPITAL AND O&M COSTS (rounded)^g						
GRAND TOTAL (rounded)^g						

Assumptions:

^aThis ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for Technical labor; and \$70.00 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Compensation of Employees by 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.

^cThis activity applies only to new respondents. There are no new respondents anticipated over the three-year period of this ICR.

^dWe 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.

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

^fSemiannual 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.

^gTotals 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)

(G) Clerical person- hours per year (G=E*0.1)	(H) Cost ² , \$
127.2	\$166,621.82
0	\$0
0	\$0
17.94	\$23,499.96
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
50.88	\$66,648.73
	\$256,771
0	\$0
826.8	\$1,083,041.86
15.9	\$20,827.73

Labor Rates		Notes:
Management	147.40	Updated 10/6/18 to match the United States Dep
Technical	117.92	Updated 10/6/18 to match the United States Dep
Clerical	57.02	Updated 10/6/18 to match the United States Dep

186 hr/response

0	\$0
	\$1,103,870
	\$1,360,000
	\$0
	\$1,360,000

technical labor, and \$57.02 per
 Civilian Workers, by
 amount for the benefit packages

3-year term of the ICR.

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Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by occupational and industry group

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Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by occupational and industry group

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

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 (E=A*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 ANNUAL BURDEN AND COST (rounded)^c					293

Assumptions:

^aThis cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and Clerical rate of \$16.49 (GS-11, Step 3, \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which expires on 10/1/2018.

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

^cTotals 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)

(F) Clerical person-hours per year (G=E*0.1)	(G) Cost ^a , \$
0	\$0
0	\$0
0	\$0
25.44	\$13,908.94
	\$13,900

Labor Rates		Notes:
Technical	65.71	Updated 10/6/18 to match the rates from t
Management	48.75	Updated 10/6/18 to match the rates from t
Clerical	26.38	Updated 10/6/18 to match the rates from t

ent overhead expenses:
cal rate of \$26.38 (GS-6,
cludes locality rates of pay.

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:he Office of Personnel Management (OPM), 2018 General Schedule.

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