

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Inorganic Arsenic Emissions from Primary Copper Smelters
(40 CFR Part 61, Subpart O) (Reinstatement)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Inorganic Arsenic Emissions from Primary Copper Smelters (40 CFR Part 61, Subpart O) (Reinstatement), EPA ICR Number 1089.05, OMB Control Number 2060-0044.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Inorganic Arsenic Emissions from Primary Copper Smelters (40 CFR Part 61, Subpart O) were proposed on July 20, 1983, and promulgated on August 4, 1986. These regulations apply to existing facilities and new facilities where the total arsenic charging rate for the copper converter department averaged over a 1-year period is greater than 75 kg/hr (165 lb/hr), as determined under 40 CFR 61.174(f). 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 61, Subpart O.

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 containing these documents, and retain the file for at least two years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Inorganic Arsenic Emissions from Primary Copper Smelters (40 CFR Part 61, Subpart O) (Renewal). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and refers to Table 2: Average Annual EPA Burden and Cost – NESHAP for Inorganic Arsenic Emissions from Primary Copper Smelters (40 CFR Part 61, Subpart O) (Renewal). There are approximately 3 primary copper smelter facilities, all which are owned and operated by the copper smelter industry. None of these 3 facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there are an average of 3 affected facilities at each plant site, and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 3 respondents per year will be subject to these standards, and no additional respondents will become subject to these same standards.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The 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, inorganic arsenics emissions from primary copper smelters 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 61, Subpart O.

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 these standards 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 and that these standards are being met. The performance test may also be observed.

The required quarterly 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 61, Subpart O.

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* (82 FR 29552) on June 29, 2017. No comments were received on the burden published in the *Federal Register* for this renewal.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 3 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both Asarco, at 520-798-7500, and Freeport-McMoRan, at 602-366-8100.

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 these 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.

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 these standards 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 owners or operators of paint stripping and miscellaneous surface coating operations at area sources. The United States Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) codes are presented in the following table:

| 40 CFR Part 61, Subpart O | SIC Codes | NAICS Codes |
|----------------------------------|------------------|--------------------|
| Copper Smelting and Refining | 3331 3339 | 331410 |

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Inorganic Arsenic Emissions from Primary Copper Smelters (40 CFR Part 61, Subpart O).

A source must make the following reports:

| Reports | |
|--|----------------|
| Quarterly reports of excess opacity | § 61.177(c)(3) |
| Quarterly reports of all air flow rates | § 61.177(d)(2) |
| Quarterly reports of changes in the operating conditions of the emission capture system that may increase fugitive emissions | § 61.177(d)(3) |

A source must keep the following records:

| Recordkeeping | |
|---|-----------------------------------|
| Records of continuous monitoring system measurements and performance evaluations, including calibration checks and adjustments | §§ 61.176(b)(1), (b)(3); § 61.175 |
| Records of emission test data and all calculations | § 61.176(b)(2) |
| Startups, shutdowns, and malfunctions of copper converters | § 61.176(b)(4) |
| Malfunctions of the air pollution control system | § 61.176(b)(5) |
| Records of periods during which the continuous monitoring system is inoperative | § 61.176(b)(6) |
| Records of daily amount of the amount of copper matte and lead matte charged to the copper converter and the total hours of operation | § 61.176(c)(1) |
| Records of monthly weight percent of arsenic contained in the copper matte and lead matte | § 61.176(c)(2) |
| Records of monthly calculation of the average annual arsenic charging rate | § 61.176(c)(3) |
| Records of all maintenance and repairs performed | § 61.176(b)(7) |

| Recordkeeping | |
|---|----------------|
| Records of 1-hour average opacity levels for each separate control device | § 61.176(b)(8) |

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 the control device. |
| Perform initial performance test, Reference Methods 5, 108A, 108B, or 108C 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 Enforcement and Compliance History Online (ECHO) and ICIS. |

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 standards. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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 two years.

5(c) Small Entity Flexibility

There are no small entities (i.e., small businesses) affected by this regulation. 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 below in Table 1: Annual Respondent Burden and Cost – Inorganic Arsenic Emissions from Primary Copper Smelters (40 CFR Part 61, Subpart O) (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 neither conduct nor 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 record-keeping and reporting requirements is estimated to be 2,380 hours (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 | \$149.35 (\$71.12 + 110%) |
| Technical | \$112.98 (\$53.80 + 110%) |
| Clerical | \$54.81 (\$26.10 + 110%) |

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, “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 standard(s) 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 for supplies to conduct the Method 108A analysis.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

| Capital/Startup vs. Operation and Maintenance (O&M) Costs | | | | | | |
|--|--|--|---|--|---|---------------------------------|
| (A) Monitoring Requirement | (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) |
| Method 108A analyses of copper matte samples | \$0 | 0 | \$0 | \$500 | 3 | \$1,500 |
| Total | | | \$0 | | | \$1,500 |

Note: Totals have been rounded to 3 significant figures. 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 \$1,500. 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 \$1,500. These are recordkeeping costs.

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 \$1,940.

This cost is based on the average hourly labor rate as follows:

| | |
|------------|--|
| Managerial | \$64.80 (GS-13, Step 5, \$40.50 + 60%) |
| Technical | \$48.08 (GS-12, Step 1, \$30.05 + 60%) |
| Clerical | \$26.02 (GS-6, Step 3, \$16.26 + 60%) |

These rates are from the Office of Personnel Management (OPM), 2017 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 Inorganic Arsenic Emissions from Primary Copper Smelters (40 CFR Part 61, Subpart O) (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 3 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 3 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

| Number of Respondents | | | | | |
|-----------------------|---|---------------------------------------|---|---|--|
| | Respondents That Submit Reports | | Respondents That Do Not Submit Any Reports | | |
| Year | (A) Number of New Respondents ¹ | (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 | 3 | 0 | 0 | 3 |
| 2 | 0 | 3 | 0 | 0 | 3 |
| 3 | 0 | 3 | 0 | 0 | 3 |
| Average | 0 | 3 | 0 | 0 | 3 |

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 3.

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 | |
| Annual report of converter charging rate | 3 | 1 | 0 | 3 | |
| Quarterly excess opacity and air | 3 | 2 | 0 | 6 | |

| Total Annual Responses | | | | |
|--------------------------------|--|--|-------|---|
| flow rate reports ^a | | | | |
| | | | Total | 9 |

^a Assumes that respondents will only need to submit excess opacity or air flow rate reports twice a year.

The number of Total Annual Responses is 9.

The total annual labor costs are \$261,000 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Inorganic Arsenic Emissions from Primary Copper Smelters (40 CFR Part 61, Subpart O) (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 in Tables 1 and 2 below, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 2,380 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Inorganic Arsenic Emissions from Primary Copper Smelters (40 CFR Part 61, Subpart O) (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 264 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$1,500. 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 41 labor hours at a cost of \$1,940; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Inorganic Arsenic Emissions from Primary Copper Smelters (40 CFR Part 61, Subpart O) (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

This is a reinstatement of a previously approved ICR. There is an adjustment decrease in the total estimated burden and cost as previously identified in the OMB Inventory of Approved Burdens. This decrease is due to a decrease in the number of sources.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 264 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 neither conduct nor 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-2017-0201. 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-2017-0201 and OMB Control Number 2060-NEW 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 Inorganic Arsenic Emissions from Primary Copper Smelters (40 CFR Part 61, Subpart O) (Renewal)

| Burden item | (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 ^a | (E) Technical person-hours per year (CxD) | (F) Management person hours per year (Ex0.05) | (G) Clerical person hours per year (Ex0.1) | (H) Total Cost Per year ^b |
|---|--|---|---|--|--|--|---|---|
| 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. Familiarization with regulatory requirements | 1 | 1 | 1 | 3 | 3 | 0.15 | 0.3 | \$377.79 |
| B. Required activities | N/A | | | | | | | |
| C. Create information ^c | | | | | | | | |
| i. Grab Samples | 1 | 365 | 365 | 3 | 1095 | 54.75 | 109.5 | \$137,891.71 |
| ii. Method 108 Analysis | 4 | 12 | 48 | 3 | 144 | 7.2 | 14.4 | \$18,133.70 |
| iii. Monthly Calculation | 1 | 12 | 12 | 3 | 36 | 1.8 | 3.6 | \$4,533.43 |
| D. Gather existing information | See 4E | | | | | | | |
| E. Write report | | | | | | | | |
| i. Quarterly report of excess opacity and flow rates ^d | 16 | 2 | 32 | 3 | 96 | 4.8 | 9.6 | \$12,089.14 |
| ii. Annual report of converter charging rate | 16 | 1 | 16 | 3 | 48 | 2.4 | 4.8 | \$6,044.57 |
| Subtotal for Reporting | | | | | | 1635 | | \$179,070 |
| 5. Recordkeeping Requirements | | | | | | | | |
| A. Familiarization with regulatory requirements | See 4A | | | | | | | |

| | | | | | | | | |
|--|--------|-----|-------|---|-------|--------------|-------|------------------|
| B. Plan activities | N/A | | | | | | | |
| C. Implement activities | See 4C | | | | | | | |
| D. Record data | 8 | 1 | 8 | 3 | 24 | 1.2 | 2.4 | \$3,022.28 |
| E. Time to transmit or disclose information | | | | | | | | |
| 1. Record Method 108A analysis results | 0.5 | 12 | 6 | 3 | 24 | 1.2 | 2.4 | \$3,022.28 |
| 2. Monthly measurements | 1.5 | 12 | 18 | 3 | 54 | 2.7 | 5.4 | \$6,800.14 |
| 3. Daily log of converter operating mode and daily record of matte charge to converter | 0.5 | 365 | 182.5 | 3 | 547.5 | 27.375 | 54.75 | \$68,945.85 |
| F. Time to train personnel | N/A | | | | | | | |
| G. Time for audits | N/A | | | | | | | |
| | | | | | | | | |
| Subtotal for Recordkeeping | | | | | | 747 | | \$81,791 |
| TOTAL LABOR BURDEN AND COST^e | | | | | | 2,380 | | \$261,000 |
| TOTAL ANNUAL COSTS (O&M)^e | | | | | | | | \$1,500 |
| GRAND TOTAL^e | | | | | | | | \$263,000 |

^a It is assumed that there are 3 respondents currently operating in the United States. It is estimated that no additional respondents will become subject to the regulation in the next three years based on information available on the sector.

^b This ICR uses the following labor rates: \$149.35 per hour for Executive, Administrative, and Managerial labor; \$112.98 per hour for Technical labor, and \$54.81 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, "Table 2: Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c The burden to report information includes labor to perform Method 108A analysis once a month; obtain a grab sample daily; labor to reduce opacity and air flow data (Assuming 1 hour per 24 hours of data from each monitoring device); and labor to perform monthly calculations. The burden estimate is based on 1 respondent per year for each activity.

^d It is assumed that respondents will only need to submit excess opacity or air flow rate reports twice a year.

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

Table 2: Average Annual EPA Burden and Cost – NESHAP for Inorganic Arsenic Emissions from Primary Copper Smelters (40 CFR Part 61, Subpart O) (Renewal)

| Burden item | (A) Person hours per occurrence^e | (B) No. of occurrences per respondent per year | (C) Facilities per year^a | (D) Technical person-hours per year (CxD) | (E) Management person hours per year (Ex0.05) | (F) Clerical person hours per year (Ex0.1) | (G) Cost, \$ |
|---|--|---|--|--|--|---|---------------------|
| Report Review: | | | | | | | |
| Review of annual report of feed arsenic content | 8 | 1 | 3 | 24 | 1.2 | 2.4 | \$1,294.13 |
| Review of quarterly excess emissions reports ^c | 2 | 2 | 3 | 12 | 0.6 | 1.2 | \$647.06 |
| TOTAL BURDEN AND COST^d | | | | 41 | | | \$1,940 |

^a It is assumed that there are 3 respondents currently operating in the United States. It is estimated that no additional respondents will become subject to the regulation in the next three years based on information available on the sector.

^b This ICR uses the following labor rates: \$149.35 per hour for Executive, Administrative, and Managerial labor; \$112.98 per hour for Technical labor, and \$54.81 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, “Table 2: Civilian Workers, by Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c It is assumed that respondents will only need to submit excess opacity or air flow rate reports twice a year.

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