

Table 1: Annual Respondent Burden and Cost – NESHAP for Inorganic Arsenic Emissions from Primary Copp

| 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) |
|--|--|---|---|--|--|--|
| 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 |
| B. Required activities | N/A | | | | | |
| C. Create information ^c | | | | | | |
| i. Grab Samples | 1 | 365 | 365 | 3 | 1095 | 54.75 |
| ii. Method 108 Analysis | 4 | 12 | 48 | 3 | 144 | 7.2 |
| iii. Monthly Calculation | 1 | 12 | 12 | 3 | 36 | 1.8 |
| 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 |
| ii. Annual report of converter charging rate | 16 | 1 | 16 | 3 | 48 | 2.4 |
| Subtotal for Reporting | | | | | 1635 | |
| 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 |
| E. Time to transmit or disclose information | | | | | | |
| 1. Record Method 108A analysis results | 0.5 | 12 | 6 | 3 | 24 | 1.2 |
| 2. Monthly measurements | 1.5 | 12 | 18 | 3 | 54 | 2.7 |
| 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 |
| F. Time to train personnel | N/A | | | | | |
| G. Time for audits | N/A | | | | | |
| | | | | | | |
| Subtotal for Recordkeeping | | | | | 747 | |
| TOTAL LABOR BURDEN AND COST ^e | | | | | 2,380 | |
| TOTAL ANNUAL COSTS (O&M) ^e | | | | | | |

| | | | | | | |
|---------------------------------|--|--|--|--|--|--|
| GRAND TOTAL ^e | | | | | | |
|---------------------------------|--|--|--|--|--|--|

^a It is assumed that there are 3 respondents currently operating in the United States. It is estimated that no additional respondents will be added 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; \$112.00 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2000, "Wages and Salaries in the Manufacturing and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to reflect inflation since 2000 and are employed by private industry.

^c The burden to report information includes labor to perform Method 108A analysis once a month; obtain a grab sample (Assuming 1 hour per 24 hours of data from each monitoring device); and labor to perform monthly calculations. The burden is estimated to be 1 hour 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.

er Smelters (40 CFR Part 61, Subpart O) (Renewal)

| (G) Clerical person hours per year (Ex0.1) | (H) Total Cost Per year ^b |
|---|--|
| | |
| | |
| | |
| | |
| 0.3 | \$377.79 |
| | |
| | |
| 109.5 | \$137,891.71 |
| 14.4 | \$18,133.70 |
| 3.6 | \$4,533.43 |
| | |
| | |
| 9.6 | \$12,089.14 |
| 4.8 | \$6,044.57 |
| | \$179,070 |
| | |
| | |
| | |
| 2.4 | \$3,022.28 |
| | |
| | |
| 2.4 | \$3,022.28 |
| 5.4 | \$6,800.14 |
| | |
| 54.75 | \$68,945.85 |
| | |
| | |
| | |
| | \$81,791 |
| | \$261,000 |
| | \$1,500 |

| | New Labor Rates | Old Labor Rates |
|------------|--------------------|--------------------|
| Managerial | 149.35 | 108.8 |
| Technical | 112.98 | 98.01 |
| Clerical | 54.81 | 46.52 |

#hrs 2,380 SEE TABLE PG. 15 of SS
 #responses 9
 hrs/response 264

| | |
|--|------------------|
| | \$263,000 |
|--|------------------|

spondents will become subject to the regulation in

98 per hour for Technical labor, and \$54.81 per
017, "Table 2: Civilian Workers, by Occupational
account for the benefit packages available to those

· daily; labor to reduce opacity and air flow data
burden estimate is based on 1 respondent per year

Table 2: Average Annual EPA Burden and Cost – NESHAP for Inorganic Arsenic Emissions from Primary Copper Smelters

| Burden item | (A) Person hours per occurrence | (B) No. of occurrences per respondent per year | (C) Facilities per year ^a | (D) Technical person-hours per year (Cx D) | (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 responder 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 Economic Analysis, 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 the primary metal 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.

nelters (40 CFR Part 61, Subpart O) (Renewal)

| | New Labor Rates | Old Labor Rates |
|-----------|--------------------------------|----------------------------|
| Manageria | 64.8 | 37.27 |
| Technical | 48.08 | 44.24 |
| Clerical | 26.02 | 23.94 |

nts will

hour for
of Labor

private

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

| (A) | (B) | (C) | (D) | (E) | (F) | (G) |
|--|---|---------------------------|--|-------------------------------------|--------------------------------|--------------------|
| Requirement | Capital/Startup Cost for One Respondent | Number of New Respondents | Total Capital/Startup Cost, (B x C x CRF) ^b | Annual O&M Costs for One Respondent | Number of Respondents with O&M | Total O&M, (E x F) |
| Method 108A analyses of copper matte samples | \$0 | 0 | \$0 | \$500 | 3 | \$1,500 |
| Total | | | \$0 | | | \$1,500 |