

Table 1 Index: Total Annual Respondent Burden and Cost

Table	NSPS Standard(s)	Labor Hours
Table 1a	NSPS for Secondary Brass and Bronze Production (40 CFR Part 60, Subpart M)	14
Table 1b	NSPS for Primary Copper Smelters (40 CFR Part 60, Subpart P); Primary Zinc Smelters (40 CFR Part 60, Subpart Q); and Primary Lead Smelters (40 CFR Part 60, Subpart R)	1,554
Table 1c	NSPS for Primary Aluminum Reduction Plants (40 CFR Part 60, Subpart S)	1,869
Table 1d	NSPS for Ferroalloy Production Facilities (40 CFR Part 60, Subpart Z)	444
Total Cost		3,880
Total O&M Costs		
Grand Total (Labor + O&M Costs)		

Table 2 Index: Total Annual Burden and Cost for the Federal Government

Table	NSPS Standard(s)	Labor Hours
Table 2a	NSPS for Secondary Brass and Bronze Production (40 CFR part 60, subpart M)	0
Table 2b	NSPS for Primary Copper Smelters (40 CFR part 60, subpart P); Primary Zinc Smelters (40 CFR part 60, subpart Q); and Primary Lead Smelters (40 CFR part 60, subpart R)	64
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Table 2d	NSPS for Ferroalloy Production Facilities (40 CFR part 60, subpart Z)	18
Total Cost		238

Annual Cost
\$1,660
\$180,000
\$216,000
\$51,400
\$449,000
\$127,000
\$576,000

47 Hrs/response

Annual Cost
\$0
\$3,100
\$8,090
\$887
\$ 12,100

Table 1a: Annual Respondent Burden and Cost for NSPS for Secondary Brass and Bronze Production (40 CFR part 60, Subpart M) (Renewal)

REPORTING/RECORDKEEPING REQUIREMENT	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year ^a	(E) Technical Hours per Year @ \$120.27 (E=C x D)	(F) Management Hours per Year @ \$141.06 (F= E x 0.05)	(G) Clerical Hours per Year @ \$58.67 (G= E x 0.1)
1. APPLICATIONS	N/A						
2. SURVEY AND STUDIES	N/A						
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS	N/A						
4. REPORTING REQUIREMENTS							
A. Familiarize with rule requirements	1	1	1	5	5	0.25	1
B. Required Activities							
Initial performance test ^c	24	1	24	0	0	0	0
Repeat of Performance Test ^d	24	0.2	4.8	0	0	0	0
Reference Method 5 or 9 ^e	4	1.2	4.8	0	0	0	0
Monitoring of emissions and systems performance ^f	0.5	365	182.5	0	0	0	0
C. Create Information	See 4B and 5E						
D. Gather Existing Information	See 4B and 5E						
E. Write Report							
Notification of actual startup ^c	2	1	2	0	0	0	0
Notification of initial performance test ^c	2	1	2	0	0	0	0
Notification of CMS ^{e,f}	2	1	2	0	0	0	0
Notification of anticipated date for conducting the opacity of observations ^{e,f}	2	1	2	0	0	0	0
Notification of modification/reconstruction	2	1	2	0	0	0	0
Semiannual reports of excess emissions and monitoring systems performance ^g	4	2	8	0	0	0	0
Subtotal for Reporting Requirements						5.8	Hours
5. RECORDKEEPING REQUIREMENTS							
A. Read and understand rule requirements	See 4A						
B. Plan Activities	See 4B						
C. Implement Activities	See 4B						
D. Develop Record System	N/A						
E. Time to Enter and Transmit Information ^h							
Records of startups, shutdowns, malfunctions, etc.	1.5	1	1.5	5	7.5	0.38	0.75
Records of emissions and systems performance	See 4B						
F. Time to Train Personnel	N/A						
G. Time for Audits	N/A						

Subtotal for Recordkeeping Requirements						8.6	Hours
TOTAL LABOR BURDEN AND COSTS ⁱ						14	Hours
TOTAL CAPITAL AND O&M COSTS (rounded) ⁱ							
GRAND TOTAL(rounded) ⁱ							

Assumptions:

- ^a We have assumed that are approximately 5 out of 11 secondary brass and bronze ingots production plants subject to NSPS Subpart M. We have further assumed that sources will become subject to the rule over the three year period of this ICR.
- ^b The labor rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and industry group. from column 1, "Total compensation." The rate has been increased by 110% to account for the benefit packages available to those employed by private industry.
- ^c Initial rule requirements would apply only to new sources. We have assumed that no new sources will become subject to the rule over the three year period of this ICR.
- ^d We have assumed that 20 percent of initial performance tests must be repeated due to failure.
- ^e Sources are required to use the following Reference Methods (RM) in conducting performance tests, if applicable: 1) RM 5 for particulate matter concentrations and vo rate of the effluent gas (all subparts); 2) RM 9 for visible emissions observations of opacity.
- ^f Section 60.11 of the General Provisions allows sources to use a continuous opacity monitor (COM) in lieu of Method 9 to determine compliance with the opacity standa we have assumed that all sources are complying with the standard using RM 9.
- ^g Only existing sources using a continuous monitoring system (i.e., a COM or a continuous parameter monitoring system) are required to submit semiannual reports. Th sources subject to NSPS subpart M are not required to submit semiannual reports.
- ^h Sources are required to maintain records of startups, shutdowns and malfunctions including periods where the continuous monitoring system is inoperative, and of emi results, continuous monitoring system data including, performance test results and other data needed to determine compliance with mass and visible emission limits.
- ⁱ Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Total Labor Costs per Year b
\$665.95
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$666
\$998.93

\$999
\$1,660
\$0
\$1,660

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Table 1b: Annual Respondent Burden and Cost for Primary Copper Smelters (40 CFR Part 60, Subpart P), Primary Zinc Smelters (40 CFR Part 60, Subpart Q), and Primary Lead Smelters (40 CFR Part 60, Subpart R) (Renewal)

REPORTING/RECORDKEEPING REQUIREMENT	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year ^a	(E) Technical Hours per Year @ \$120.27 (E=C x D)	(F) Management Hours per Year @ \$141.06 (F= E x 0.05)	(G) Clerical Hours per Year @ \$58.67 (G= E x 0.1)	Total Labor Costs per Year ^b
1. APPLICATIONS	N/A							
2. SURVEY AND STUDIES	N/A							
3. ACQUISITION, INSTALLATION AND UTILIZATION OF TECHNOLOGY AND SYSTEMS	N/A							
4. RECORDING REQUIREMENTS								
A. Familiarize with rule requirements	1	1	1	7	7.0	0.35	0.70	\$932.33
B. Required Activities								
Initial performance test ^c	24	1	24	0	0	0	0	\$0
Repeat of performance test ^d	24	0.2	4.8	0	0	0	0	\$0
Reference Method 5 or 9 ^e	4	1.2	4.8	0	0	0	0	\$0
Monitoring of emissions and operations ^f	0.5	365	182.5	7	1277.5	63.88	127.75	\$170,150.23
C. Create Information	See 4B and 5E							
D. Gather Existing Information	See 4B and 5E							
E. Write Report								
Notification of actual startup ^c	2	1	2	0	0	0	0	\$0
Notification of initial performance test ^c	2	1	2	0	0	0	0	\$0
Performance test results ^{c,f}	2	1	2	0	0	0	0	\$0
Notification of CMS ^{c,e,f}	2	1	2	0	0	0	0	\$0
Notification of anticipated date for conduction the opacity of observations ^{c,e,f}	2	1	2	0	0	0	0	\$0
Notification of modification/reconstruction	2	1	2	0	0	0	0	\$0
Semiannual reports of excess emissions and monitoring systems performance ^g	4	2	8	7	56	2.8	5.6	\$7,458.64
Process Change	2	2	4	0	0	0	0	\$0
Subtotal for Reporting Requirements						1,542	Hours	\$178,541
5. RECORDKEEPING REQUIREMENTS								
A. Read and understand rule requirements	See 4A							
B. Plan Activities	See 4B							
C. Implement Activities	See 4B							
D. Develop Record System	N/A							

Table 1c: Annual Respondent Burden and Cost for NSPS for Primary Aluminum Reduction Plants (40 CFR Part 60, Subpart S) (Renewal)

REPORTING/RECORDKEEPING REQUIREMENT	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year ^a	(E) Technical Hours per Year @ \$120.27 (E=C x D)	(F) Management Hours per Year @ \$138.43 (F= E x 0.05)	(G) Clerical Hours per Year @ \$58.67 (G= E x 0.1)	Total Labor Costs per Year ^b
1. APPLICATIONS	N/A							
2. SURVEY AND STUDIES	N/A							
3. ACQUISITION, INSTALLATION AND UTILIZATION OF TECHNOLOGY AND SYSTEMS	N/A							
4. RECORDING REQUIREMENTS								
A. Familiarize with rule requirements	1	1	1	4	4	0.2	0.4	\$532.76
B. Required Activities								
Initial performance test ^c	24	1	24	0	0	0	0	\$0
Monthly performance test ^d	24	12	288	2	576	28.8	57.6	\$76,717.44
Annual performance test ^d	24	1	24	2	48	2.4	4.8	\$6,393.12
Repeat of performance test ^{c,d}	24	1.3	31.2	4	125	6.2	12.5	\$16,622.11
Reference Method 5 or 9 ^e	4	1.2	4.8	0	0	0	0	\$0
Monitoring of emissions and operations ^f	0.5	365	182.5	4	730	36.5	73	\$97,228.70
C. Create Information	See 4B and 5E							
D. Gather Existing Information	See 4B and 5E							
E. Write Report								
Notification of actual startup ^c	2	1	2	0	0	0	0	\$0
Notification of annual performance tests ^{d,f}	2	1	2	2	4	0.2	0.4	\$532.76
Notification of monthly performance tests ^{d,f}	2	12	24	2	48	2.4	4.8	\$6,393.12
Annual performance test results ^f	2	1	2	2	4	0.2	0.4	\$532.76
Monthly performance test results ^f	2	12	24	2	48	2.4	4.8	\$6,393.12
Notification of CMS ^{e,f}	2	1	2	0	0	0	0	\$0
Notification of anticipated date for conduction the opacity of observations ^{e,f}	2	1	2	0	0	0	0	\$0
Notification of modification/reconstruction	2	1	2	0	0	0	0	\$0
Semiannual reports of excess emissions and monitoring systems performance ^g	4	2	8	4	32	1.6	3.2	\$4,262.08
Process Change	2	2	4	0	0	0	0	\$0
Subtotal for Reporting Requirements						1,862	Hours	\$215,608
5. RECORDKEEPING REQUIREMENTS								
A. Read and understand rule requirements	See 4A							

B. Plan Activities	See 4B							
C. Implement Activities	See 4B							
D. Develop Record System	N/A							
E. Time to Enter and Transmit Information: ^h								
Records of startups, shutdowns, malfunctions, etc.	1.5	1	1.5	4	6	0.3	0.6	\$799.14
Records of monitoring of emissions and operations	See 4B							
F. Train Personnel	N/A							
G. Audits	N/A							
Subtotal for Recordkeeping Requirements						7	Hours	\$799
TOTAL LABOR BURDEN AND COSTS ⁱ						1,869	Hours	\$216,000
TOTAL CAPITAL AND O&M COSTS (rounded) ⁱ								\$20,000
GRAND TOTAL(rounded) ⁱ								\$236,000

Assumptions:

^a It is estimated that there are 23 primary aluminum plants are currently operating nationwide with 91 potlines that produce aluminum, each plant having a paste production plant, and only 17 of these plants having anode bake furnaces. However, only a total of 5 potlines at 4 plants are estimated to be subject to the NSPS standards. However, the Agency has promulgated new standards for the primary aluminum sector, MACT subpart LL. This rule allows sources to comply with the requirements for potroom groups and anode bake furnaces as an alternative to the NSPS requirements. In addition, the MACT rule requirements for anode bake plants are more stringent and superseded the NSPS requirements for such affected facility. Therefore, the burden for complying with the NSPS standard is associated with sources complying with the requirements for potroom groups only. We have further assumed that no additional sources per year will become subject to the NSPS standard in the next three years.

^b The labor rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rate has been increased by 110% to account for the benefit packages available to those employed by private industry.

^c Initial rule requirements would apply only to new sources. We have assumed that no new sources will become subject to the rule over the three year period of this ICR.

^d The rule requires sources to conduct a monthly performance test after the initial test and requires them to provide a 15 days advance notice of each test, except for the two sources specified in the rule that were allowed to conduct an annual performance test. We have further assumed that only 10 percent of the performance tests will have to be repeated.

^e Sources are required to use the following Reference Methods (RM) in conducting performance tests, if applicable: 1) RM 5 for particulate matter concentrations and volumetric flow rate of the effluent gas; and 2) RM 9 for visible emissions observations of opacity.

^f Section 60.11 of the General Provisions allows sources to use a continuous opacity monitor (COM) in lieu of Method 9 to determine compliance with the opacity standard. We have assumed that all sources are complying with the standard using RM 9, however, the sources are using continuous monitoring systems (CMS) to monitor other parameters.

^g Only existing sources using a continuous monitoring system (i.e., a COM or a continuous parameter monitoring system) are required to submit semiannual reports. Therefore, sources subject to NSPS subpart S are required to submit semiannual reports.

^h Sources are required to maintain records of their operations including records of startups, shutdowns and malfunctions, periods where the continuous monitoring system is inoperative, emission test results, performance test results and other operational data needed to determine compliance with mass and visible emission standards.

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

Records of startups, shutdowns, malfunctions, etc	1.50	1	1.50	2	3	0.15	0.3	\$399.57
Records of monitoring of emissions and operations	See 4B							
F. Train Personnel	N/A							
G. Audits	N/A							
Subtotal for Recordkeeping Requirements						3	Hours	\$400
TOTAL LABOR BURDEN AND COSTS ⁱ						444	Hours	\$51,400
TOTAL CAPITAL AND O&M COSTS (rounded) ⁱ								\$16,800
GRAND TOTAL(rounded) ⁱ								\$68,200

Assumptions:

^a It is estimated that 2 out of 7 ferroalloy production facilities nationwide is subject to the NSPS Subpart Z standards. We have further assumed that no additional sources per year will become subject to the NSPS standard in the next three years.

^b The labor rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rate has been increased by 110% to account for the benefit packages available to those employed by private industry.

^c Initial rule requirements would apply only to new sources. We have assumed that no new sources will become subject to the rule over the three year period of this ICR.

^d We have assumed that 20 percent of initial performance tests must be repeated due to failure.

^e Sources are required to use the following Reference Methods (RM) in conducting performance tests, if applicable: 1) RM 5 for particulate matter concentrations and volumetric flow rate of the effluent gas; 2) RM 9 for visible emissions observations of opacity.

^f Section 60.11 of the General Provisions allows sources to use a continuous opacity monitor (COM) in lieu of Method 9 to determine compliance with the opacity standard. We have assumed that all sources are complying with the standard using COMs. In addition, we assume the sources are using continuous monitoring systems (CMS) to monitor other parameters.

^g We have assumed that neither source will not have a product change over the 3 year period of the ICR.

^h Only existing sources using a continuous monitoring system (i.e., a COM or a continuous parameter monitoring system) are required to submit semiannual reports. Therefore, sources subject to NSPS Subpart Z are required to submit semiannual reports.

ⁱ Sources are required to maintain records of operations including startups, shutdowns and malfunctions, periods where the continuous monitoring system is inoperative, emission test results, and continuous monitoring system data including, performance test results and other data needed to determine compliance with mass and visible emission limits.

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

Table 2a: Average Annual Agency Burden for NSPS for Secondary Brass and Bronze Production (40 CFR Part 60, Subpart M) (Renewal)

REPORTING/RECORDKEEPING REQUIREMENT	(A) EPA Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year ^a	(E) Technical Hours per Year @ \$49.44 (E=C x D)	(F) Management Hours per Year @ \$66.62 (F= E x 0.05)	(G) Clerical Hours per Year @ \$26.75 (G= E x 0.1)	Costs per Year ^b
Notification of actual startup ^c	2.00	1	2	0	0	0	0	\$0
Notification of initial performance test	2.00	1	2	0	0	0	0	\$0
Report of performance test results	2.00	1	2	0	0	0	0	\$0
Notification of CMS	2.00	1	2	0	0	0	0	\$0
Notification of anticipated date for conducting the opacity of observations	2.00	1	2	0	0	0	0	\$0
Notification of modification/reconstruction	2.00	1	2	0	0	0	0	\$0
Semiannual reports of excess emissions and monitoring systems performance ^d	4.00	2	8	0	0	0	0	\$0
SALARY BURDEN (per year)								\$0
ANNUAL TRAVEL EXPENSES ^e								
(1 person x 0 plants/year x 1 d/plant x \$50 per diem) + (\$400 round trip/plant x 1 plant/yr) =								\$0
TOTAL (rounded) ^f						0	Hours	\$0

Assumptions:

^a We have assumed that there are approximately five secondary brass and bronze producers subject to the NSPS subpart M standard and that no new sources will become subject to the NSPS standard in the next three years.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$66.62 for Managerial (GS-13, Step 5, \$41.64 x 1.6), \$49.44 for Technical (GS-12, Step 1, \$30.90 x 1.6) and \$26.75 Clerical (GS-6, Step 3, \$16.72 x 1.6). These rates are from the Office of Personnel Management (OPM) "2019 General Schedule" which excludes locality rates of pay.

^c We have assumed that all existing sources are in compliance with the initial rule requirements.

^d Only existing sources using a continuous monitoring system (i.e., a COM or a continuous parameter monitoring system) are required to submit semiannual reports. Therefore, sources subject to NSPS Subpart M are not required to submit semiannual reports.

^e The time required to attend a performance test per plant is estimated to be approximately 24 hours (1 day).

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

a)

Average Annual Agency Burden for NSPS for Primary Copper Smelters (40 CFR part 60, subpart P), Primary Zinc Smelters (40 CFR part 60, subpart Q), and Primary Lead Smelters (40 CFR part 60, subpart R) (Renewal)

REPORTING/RECORDKEEPING REQUIREMENT	(A) EPA Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year ^a	(E) Technical Hours per Year @ \$49.44 (E=C x D)	(F) Management Hours per Year @ \$66.62 (F= E x 0.05)	(G) Clerical Hours per Year @ \$26.75 (G= E x 0.1)	Costs per Year ^b
Notification of actual startup ^c	2	1	2	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Report of performance test results	2	1	2	0	0	0	0	\$0
Notification of CMS	2	1	2	0	0	0	0	\$0
Notification of anticipated date for conducting the opacity of observations	2	1	2	0	0	0	0	\$0
Notification of modification/reconstruction	2	1	2	0	0	0	0	\$0
Semiannual reports of excess emissions and monitoring systems performance ^d	4	2	8	7	56	2.8	5.6	\$3,104.98
SALARY BURDEN (per year)								\$3,104.98
ANNUAL TRAVEL EXPENSES ^e								
(1 person x 0 plants/year x 1 d/plant x \$50 per diem) + (\$400 round trip/plant x 1 plant/yr) =								\$0
TOTAL (rounded) ^f						64	Hours	\$3,100

Assumptions:

^a We have assumed that there are approximately six primary copper smelters (subpart P), one primary zinc smelter (subpart Q), and one primary lead smelter (subpart R) subject to the NSPS standard for a total of eight respondents. However, we assume that the affected units at the one primary lead smelter facility has been shutdown, so only 7 facilities in total will have burden associated with this rule. We have further assumed that there will be no new sources in the next three years.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$66.62 for Managerial (GS-13, Step 5, \$41.64 x 1.6), \$49.44 for Technical (GS-12, Step 1, \$30.90 x 1.6) and \$26.75 Clerical (GS-6, Step 3, \$16.72 x 1.6). These rates are from the Office of Personnel Management (OPM) "2019 General Schedule" which excludes locality rates of pay.

^c We have assumed that all existing sources are in compliance with the initial rule requirements.

^d Only existing sources using a continuous monitoring system (i.e., a COM or a continuous parameter monitoring system) are required to submit semiannual reports. Therefore, sources subject to NSPS subparts P, Q and R are required to submit semiannual reports.

^e The time required to attend a performance test per plant is estimated to be approximately 24 hours (1 day).

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

Table 2c. Average Annual Agency Burden for NSPS for Primary Aluminum Reduction Plants (40 CFR part 60, subpart S) (

REPORTING/RECORDKEEPING REQUIREMENT	(A) EPA Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year ^a	(E) Technical Hours per Year @ \$49.44 (E=C x D)	(F) Management Hours per Year @ \$66.62 (F= E x 0.05)	(G) Clerical Hours per Year @ \$26.75 (G= E x 0.1)
Notification of actual startup ^c	2	1	2	0	0	0	0
Notification of annual or monthly performance tests ^d	2	1	2	2	4	0.2	0.4
Report of annual or monthly performance test results ^d	2	12	24	2	48	2.4	4.8
Notification of CMS	2	1	2	2	4	0.2	0.4
Notification of anticipated date for conducting the opacity of observations	2	12	24	2	48	2.4	4.8
Notification of modification/reconstruction	2	1	2	0	0	0	0
Semiannual reports of excess emissions and monitoring systems performance ^e	2	1	2	0	0	0	0
SALARY BURDEN (per year)	4	2	8	4	32	1.6	3.2
ANNUAL TRAVEL EXPENSES ^e							
(1 person x 1 plants/year x 3 d/plant x \$50 per diem) + (\$400 round trip/plant x 1 plant/yr) =							
TOTAL (rounded) ^f							156 Hours

Assumptions:

^a It is estimated that there are 23 primary aluminum plants are currently operating nationwide with 91 potlines that produce aluminum, each plant having a past production plant, and only 17 of these plants having anode bake furnaces. However, only a total of 5 potlines at 4 plants are estimated to be subject to the NS standards. However, the Agency has promulgated new standards for the primary aluminum sector, MACT subpart LL. This rule allows sources to comply with requirements for potroom groups and anode bake furnaces as an alternative to the NSPS requirements. In addition, the MACT rule requirements for anode be are more stringent and superseded the NSPS requirements for such affected facility. Therefore, the burden for complying with the NSPS standard is associated with sources complying with the requirements for potroom groups only. We have further assumed that no additional sources per year will become subject to the NS standard in the next three years.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$66.62 for Man 13, Step 5, \$41.64 x 1.6), \$49.44 for Technical (GS-12, Step 1, \$30.90 x 1.6) and \$26.75 Clerical (GS-6, Step 3, \$16.72 x 1.6). These rates are from the Office Personnel Management (OPM) "2019 General Schedule" which excludes locality rates of pay.

^c We have assumed that all existing sources are in compliance with the initial rule requirements.

^d Only existing sources using a continuous monitoring system (i.e., a COM or a continuous parameter monitoring system) are required to submit semiannual reports. Therefore, sources subject to NSPS subpart S are required to submit semiannual reports.

^e The time required to attend a performance test per plant is estimated to be approximately 24 hours (1 day).

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

Renewal)

Costs per Year ^b
\$0
\$221.78
\$2,661.41
\$221.78
\$2,661.41
\$0
\$0
\$0
\$1,774.27
\$7,541
\$550.00
\$8,090

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Table 2d: Average Annual Agency Burden for NSPS for Ferroalloy Production Facilities (40 CFR part 60, subpart Z) (Renewal)

REPORTING/RECORDKEEPING REQUIREMENT	(A) EPA Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year ^a	(E) Technical Hours per Year @ \$49.44 (E=C x D)	(F) Management Hours per Year @ \$66.62 (F= E x 0.05)	(G) Clerical Hours per Year @ \$26.75 (G= E x 0.1)	Costs per Year ^b
Notification of actual startup ^c	2	1	2	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Report of performance test results	2	1	2	0	0	0	0	\$0
Notification of CMS	2	1	2	0	0	0	0	\$0
Notification of anticipated date for conducting the opacity of observations	2	1	2	0	0	0	0	\$0
Notification of modification/reconstruction	2	1	2	0	0	0	0	\$0
Notification of product change	4	1	4	0	0	0	0	\$0
Semiannual reports of excess emissions and monitoring systems performance ^e	4	2	8	2	16	0.8	1.6	\$887.14
SALARY BURDEN (per year)								\$887.14
ANNUAL TRAVEL EXPENSES ^e	(1 person x 0 plants/year x 1 d/plant x \$50 per diem) + (\$400 round trip/plant x 1 plant/yr) =							\$0
TOTAL (rounded) ^f						18	Hours	\$887

Assumptions:

^a We have assumed that there are 2 ferroalloy production facilities subject to NSPS subpart Z and that no new sources will become subject to the NSPS standard in the next three years.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$66.62 for Managerial (GS-13, Step 5, \$41.64 x 1.6), \$49.44 for Technical (GS-12, Step 1, \$30.90 x 1.6) and \$26.75 Clerical (GS-6, Step 3, \$16.72 x 1.6). These rates are from the Office of Personnel Management (OPM) "2019 General Schedule" which excludes locality rates of pay.

^c We have assumed that all existing sources are in compliance with the initial rule requirements.

^d Only existing sources using a continuous monitoring system (i.e., a COM or a continuous parameter monitoring system) are required to submit semiannual reports. Therefore, sources subject to NSPS subpart Z are required to submit semiannual reports.

^e The time required to attend a performance test per plant is estimated to be approximately 24 hours (1 day).

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

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

(A)	(B)	(C)	(D)	(E)	(F)	(G)
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	Number of Respondents with O&M	Total O&M, (E X F)
						(E X F)
Subpart M						
None	N/A	0	\$0	N/A	0	\$0
Subparts P, Q, R^a						
Opacity monitor	\$36,000	0	\$0	\$7,500	7	\$52,500
CMS that measures SO ₂ emissions	\$25,100	0	\$0	\$5,400	7	\$37,800
Subpart S						
CMS that weighs Al and anode produced daily	Unknown	0	\$0	\$5,000	4	\$20,000
Subpart Z						
Opacity monitor	\$36,000	0	\$0	\$7,500	2	\$15,000
CMS that measures furnace power input and flow rate or fan motor power consumption and pressure drop across fan	Gas flow - \$13,500 Pressure drop - \$1,300	0	\$0	\$900	2	\$1,800
TOTAL			\$0			\$127,000