

**Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Magnesium Refining (40**

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person hours per year (E=CxD)
1. Reporting requirements					
a. Familiarize with regulatory requirements	4	1	4	1	4
b. Process/review information	4	4	16	1	16
c. Write reports					
i. Initial notification	2	1	2	0	0
ii. Notification of compliance status <sup>c</sup>	2	1	2	0.33	0.66
iii. Notification of construction/reconstruction	2	1	2	0	0
iv. Notification of actual startup	2	1	2	0	0
v. Notification of performance test <sup>c</sup>	2	1.2	2.4	0.33	0.79
vi. Report of performance test <sup>c, d</sup>	180	1.2	216	0.33	71.28
vii. Semiannual report <sup>e</sup>	10	2	20	1	20
viii. Report of performance test (through CEDRI using ERT) <sup>f</sup>	8	1	8	1	8
<b>Subtotal for Reporting Requirements</b>					
2. Recordkeeping requirements					
a. Familiarize with regulatory requirements	4	1	4	1	4
b. Plan activities	12	1	12	1	12
c. Implement activities	12	1	12	1	12
d. Time to train personnel	10	1	10	1	10
e. Record CRB Malfunction corrective measures <sup>g</sup>	0.5	3	1.5	1	1.5
f. Record control device pH, liquid flow and pressure drop on an on-going basis.	0.5	12	6	1	6
g. Store, file, and maintain records <sup>h</sup>	1	365	365	1	365
h. Retrieve records/reports <sup>i</sup>	1	12	12	1	12
<b>Subtotal for Recordkeeping Requirements</b>					
<b>Total Labor Burden and Costs (rounded) <sup>j</sup></b>					
<b>Total Capital and O&amp;M Costs (rounded) <sup>j</sup></b>					
<b>Grand Total (rounded) <sup>j</sup></b>					

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately one respondents subject to the rule, with no new sources expected over the

<sup>b</sup> This ICR uses the following labor rates: \$139.63 per hour for Executive, Administrative, and Managerial labor; \$119.47 p per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, Decem Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 1 available to those employed by private industry.

<sup>c</sup> We have assumed that performance tests will be repeated once in three years. We assume that 20% of tests will need to be

- <sup>d</sup> We assume that this includes Method 23 test.
- <sup>e</sup> We assumed that it will take each respondent ten hours two times per year to complete semiannual reports.
- <sup>f</sup> Submittal of performance test data through the EPA's CEDRI in ERT format is estimated to require 8 hours annually, including the standards and the actions taken to minimize emissions.
- <sup>g</sup> It is estimated that three CRB malfunctions would occur per year based on chlorine emission reports submitted by the facility from the Utah Department of Environmental Quality's (DEQ) Electronic Document Management System (EDMS) <http://eq>
- <sup>h</sup> This includes inspection of unpaved areas.
- <sup>i</sup> We assume that it will take 1 hour once per month to retrieve records/reports.
- <sup>j</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**CFR Part 63, Subpart TTTTT) (Proposed Amendments)**

(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Annual costs (\$) <sup>b</sup>
0.2	0.4	\$529
0.8	1.6	\$2,116
0	0	\$0
0.03	0.07	\$87
0	0	\$0
0	0	\$0
0.04	0.08	\$105
3.56	7.13	\$9,428
1	2	\$2,645
0.4	0.8	\$1,058
<b>139</b>		<b>\$15,969</b>

Labor Rates:	
Management	\$139.63
Technical	\$119.47
Clerical	\$58.15

0.2	0.4	\$529
0.6	1.2	\$1,587
0.6	1.2	\$1,587
0.5	1	\$1,323
0.075	0.15	\$198
0.3	0.6	\$794
18.25	36.5	\$48,277
0.6	1.2	\$1,587
<b>486</b>		<b>\$55,883</b>
<b>625</b>		<b>\$71,900</b>
		<b>\$1,200</b>
		<b>\$73,100</b>

3.73 responses  
167 hr/response

next three-years of this ICR.

er hour for Technical labor, and \$58.15  
er 2018, “Table 2. Civilian Workers, by  
10% to account for the benefit packages

repeated.

udes keeping records of failures to meet

lity (2018 through Sept 2019) available  
[edocs.utah.gov/](http://edocs.utah.gov/).

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Magnesium Refining**

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per Year <sup>a</sup>	(E) Technical person hours per year (E=CxD)
1. Initial performance test <sup>c</sup>	24	1	24	0.33	7.92
2. Repeat performance test <sup>c</sup>	24	0.2	4.8	0.33	1.58
3. Report review					0
a. Initial notification	8	1	8	0	0
b. Notification of performance test <sup>c</sup>	8	1.2	9.6	0.33	3.17
c. Notification of compliance status <sup>c</sup>	8	1	8	0.33	2.64
d. Notification of construction/reconstruction	8	1	8	0	0
e. Notification of actual startup	8	1	8	0	0
f. Report of performance test <sup>c</sup>	8	1.2	9.6	0.33	3.17
g. Semiannual report <sup>d</sup>	16	2	32	1	32
<b>Total (rounded) <sup>e</sup></b>					

**Assumption:**

- <sup>a</sup> We have assumed that there are approximately one respondent subject to the rule, with no new sources expected over the period of the rule.
- <sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for gov 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 (C \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) “2019 General Schedule” which excludes overtime.
- <sup>c</sup> We have assumed that performance tests will be repeated once in three years. We assume that 20% of tests will need to be repeated.
- <sup>d</sup> We have assumed that it would take 16 hours two times per year to review semiannual reports.
- <sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**(40 CFR Part 63, Subpart TTTTT) (Proposed Amendments)**

(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Annual costs (\$) <sup>b</sup>
0.40	0.79	\$433
0.08	0.16	\$87
0	0	\$0
0	0	\$0
0.16	0.32	\$173
0.13	0.26	\$144
0	0	\$0
0	0	\$0
0.16	0.32	\$173
1.6	3.2	\$1,750
<b>58</b>		<b>\$2,760</b>

Labor Rates:	
Management	\$65.71
Technical	\$48.75
Clerical	\$26.38

ie next three-years of this ICR.

ernment overhead expenses:

Clerical rate of \$26.38 (GS-6, Step 3,  
des locality rates of pay.

be repeated.