SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (Renewal), EPA ICR Number 1767.09, OMB Control Number 2060-0360.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) were proposed on September 26, 1996; promulgated on October 7, 1997; and amended on October 15, 2015.

These regulations apply to owner or operator of the affected facilities, which include new or existing potlines, paste production plants, or anode bake furnaces associated with primary aluminum production and located at a major source, and for each new pitch storage tank associated with a primary aluminum reduction plant. New facilities include those that commenced either construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart LL.

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 of these measurements and retain the file for at least five years following the date of such measurements, 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.

There are 8 major source primary aluminum reduction facilities in the United States, which are the respondents in this ICR. All of these eight facilities are publicly-owned; none of the facilities are owned by either state, local, tribal agencies, or the Federal government. The "burden" to the "Affected Public" may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (Renewal). The Federal Government's "burden" is attributed entirely to work performed by either Federal employees or government contractors and may be found at the end

of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (Renewal).

Based on our consultations with industry representatives, there is an average of one affected facility 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, we estimate 8 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

The active (previous) ICR had the following Terms of Clearance (TOC):

> In accordance with 5 CFR 1320, the information collection is approved for three years. The agency is reminded that collections that change the frequency of collection such as is explained in the supporting statement, the agency should submit the collection as a revision of a currently approved collection to OMB.

The Agency acknowledges the Terms of Clearance. The prior ICR (1767.08) incorporated 'burden' from rule amendments previously included under ICR 2447.01. This ICR reflects the ongoing rule requirements, which have not changed in the last three years, and does not reflect any changes to the frequency of the collection or the data collected.

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, total fluoride (TF), polycyclic organic matter (POM), particulate matter (PM), nickel, arsenic, polychlorinated biphenyl (PCB), mercury (Hg), and carbonyl sulfide emissions from primary aluminum reduction plants 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 63, Subpart LL.

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, leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

The required semiannual 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 63, Subpart LL.

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* (85 FR 28003) on May 12, 2020. 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 eight respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and that these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Aluminum Association, at (703) 358-2976, and Kaiser Aluminum, at (800) 873-2011.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, the Aluminum Association provided information on the number of primary aluminum reduction plants currently operating in the U.S. showing consolidation within the industry, which we confirmed through review of additional resources. The number of respondents has been adjusted from 11 to 8, accordingly.

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.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to these standards. EPA believes that the five-year records retention requirement is consistent with

the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. The EPA has found that the most flagrant violators have violations extending beyond five years. In addition, the EPA would be prevented from pursuing the violators due to either the destruction or nonexistence of essential records.

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 primary aluminum reduction plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3334, which corresponds to the North American Industry Classification System (NAICS) code 331312 for Primary Production of Aluminum.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL).

A source must make the following reports:

Notifications	
Initial notification when source becomes subject to standard.	§63.9(b), §§63.850(a)(1)-(3)
Request for Compliance Extension	§63.9(c)
New Source Notification for Special Compliance Requirements	§63.9(d)

Notifications	
Notification and application of construction/reconstruction.	§63.5(d), §63.9(b)(4), §63.850(a)(4)
Notification of initial performance test.	§63.7(b), §63.9(e), §63.850(a)(5)
Notification of initial compliance status.	§63.850(a)(6), §§63.9(h)(1)-(3)
One-time notification for each affected source of the intent to use an HF continuous emission monitor.	§63.850(a)(7)
Notification of compliance approach.	§63.850(a)(8)
One-time notification for startup of an existing potline or potroom group, anode bake furnace, or paste production plant that was shut down for a long period and subsequently restarted.	§63.850(a)(9)
Notification of compliance status including excess emissions report.	§63.9(h)

Reports	
Performance test results/reports.	§63.10(d)(2), §63.850(b)
Continuous emissions monitoring system performance evaluation reports.	§63.10(d)(2), §63.850(c)
Opacity or visible emissions reports.	§63.10(d)(3)
Progress reports.	§63.10(d)(4)
Excess emissions reports.	§63.850(d)(1)
Malfunction reports.	§63.850(d)(2)
Additional CMS reports, Recordkeeping/Reporting waiver.	§63.10(e), §63.10(f)
Design specifications for pitch storage tank controls	§63.847(g)

A source must keep the following records:

Recordkeeping	
Records of all reports and notifications.	§63.10(b)(1)
Records are required to be retained for five years. The most recent two years of records must be retained at the facility.	§63.10(b)(1), §63.850(e)(1)
Records of aluminum production rate and anode production.	§§63.850(e)(4)(i)-(ii)
Records of design information for paste production plant capture systems and alternative control devices.	§§63.850(e)(4)(iv)-(v)

Recordkeeping	
Records supporting the monitoring of similar potlines demonstrating that the performance of similar potlines is the same as or better than that of potlines sampled by manual methods.	§63.850(e)(4)(vi)
Records supporting a request for reduced sampling of potlines.	§63.850(e)(4)(vii)
Records supporting the correlation of emissions measured by a continuous emission monitoring system to emissions measured by manual methods.	§63.850(e)(4)(viii)
The implementation plan for emissions averaging.	§63.850(e)(4)(ix)
Records demonstrating that the daily inspection of a potline with wet roof scrubbers for secondary emission control has been performed as required.	§63.850(e)(4)(x)
Records demonstrating that the daily visual inspection of the exhaust stack for each control device has been performed as required, including the results of each inspection.	§63.850(e)(4)(xi)
Records of information and data required by §63.10(c) for a potline equipped with an HF continuous emission monitor, including: all required CMS measurements, date and time when the CMS was inoperative or out of control, periods of excess emissions and parameter monitoring exceedances, periods of SSM, repairs or adjustments to the CMS, total process operating time during the reporting period, and all procedures that are part of a quality control program.	§63.850(e)(4)(xii), §63.10(b)(2), §§63.10(c)(1), §§63.10(c)(5)-(9), §§63.10(c)(12)-(14)
Records documenting the corrective actions taken when the limits for an operating parameter were exceeded, when visible emissions indicating abnormal operation were observed from a control device stack during a daily inspection, or when a problem was detected during the daily inspection of a wet roof scrubber for potline secondary control.	§63.10(b)(2), §63.850(e)(4)(xiii)
Records documenting any POM data that are invalidated due to the installation and startup of a cathode.	§63.850(e)(4)(xiv)
Records documenting the portion of TF that is measured as particulate matter and the portion that is measured as gaseous when the particulate and gaseous fractions are quantified separately using an approved test method.	§63.850(e)(4)(xv)
Records of the occurrence and duration of each malfunction of operation (*i.e.* process equipment) or the air pollution control equipment and monitoring equipment.	§63.10(b)(2), §63.850(e)(4)(xvi)
Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning	§63.10(b)(2), §63.850(e)(4)(xvii)

Recordkeeping	
process and air pollution control and monitoring equipment to its normal or usual manner of operation.	
Records of performance tests, CMS performance evaluations, and opacity and visible emission observations;	§63.7(g), §63.10(b)(2)(viii)
Records of applicability determinations.	§63.10(b)(3)

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.

On October 15, 2015, 40 CFR Part 63 Subpart LL was amended to provide for electronic reporting. The amendments to the NESHAP require that any performance tests performed after October 15, 2015, be submitted electronically to EPA's Central Data Exchange by using the Electronic Reporting Tool (ERT) for test methods that are compatible with ERT (see https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert), or other compatible electronic spreadsheet. This requirement to submit the data to the ERT is in addition to the other existing submission requirements for this data.

(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 dry alumina scrubbers, dry coke scrubbers, wet scrubbers, electrostatic precipitators and wet roof scrubbers. If approved by the appropriate regulatory agency, a respondent may install, calibrate, maintain, and operate an HF CMS for the monitoring of TF secondary emissions as an alternative method.
Perform initial performance test, Reference Method 1, 2, 3, 4, 5, 5D or 5I, 13A or 13B, 14 or 14A, 17, 18, 22, 25 or 25A, 26 or 26A, 29, 315, and CARB 428 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 collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.

Respondent Activities
Develop, acquire, install, and utilize technology and systems for 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

The 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 and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in these reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by the 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. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. The 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 five years.

5(c) Small Entity Flexibility

The 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 at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (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 52,300 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	$148.45 ($70.69 + 110%)
Technical	$121.46 ($57.84 + 110%)

Clerical $60.23 ($28.68 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, "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 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 to maintain the monitors and other costs such as photocopying and postage.

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

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)
HF CEMs (similar potlines) [a]	$100,000	0	$0	$2,623	0	$0
Method 14 sampling manifolds at potlines [b]	$200,000	0	$0	$5,248	16	$83,972
Method 14A (alcan cassettes) sampling at potlines [b]	$92,000	0	$0	$2,414	11	$26,557
Install two manifold sampling systems at one facility [c]	$110,000	1	$110,000	$5,248	1	$5,248
Record storage [d]	$55	8	$440			
PM testing on anode bake furnaces [e]				$5,625	8	$45,000
PM testing on paste production plants [f]				$5,625	7	$39,375
Totals (rounded) [g]			$110,000			$200,000

[a] The previous ICR (1767.08) assumes that no respondents are using hydrogen fluoride CEMS for monitoring similar potlines.

[b] We assume 16 potlines will used Method 14 testing for TF and 11 potlines do not have manifolds installed and will use Method 14A Alcan Cassette testing. These values are based on adjustments to estimates from the Final

Cost Impacts for the Primary Aluminum Production Source Category for the 2015 amendments, which estimated 30 potlines at 9 facilities will require TF testing, including 18 potlines with manifolds and 12 potlines without manifolds. We have adjusted these estimates to account for the lower number of facilities. O&M costs have been updated from 1997 dollars to 2019 dollars using the CEPCI CE Index.

[c] Per the revisions in the 2015 RTR, one facility is required to install two manifold sampling systems at a total cost of $1 million. Annualized at 7% for 15 years, the annual cost is $110,000 per year. Cost data is from "Final Cost Impacts for the Primary Aluminum Production Source Category", September 1, 2015, EPA-HQ-OAR-0797-0423.

[d] Per the revisions in the 2015 RTR, all eight facilities are required to install record storage systems at a total cost of $500 each, annualized at 7% for 15 years ($500 x capital recovery factor of 0.10979 = $55 annually)..

[e] Per the revisions in the 2015 RTR, annual monitoring costs are estimated at $5,625/furnace/year. Cost data is from "Final Cost Impacts for the Primary Aluminum Production Source Category", September 1, 2015, EPA-HQ-OAR-0797-0423.

[f] Per the revisions in the 2015 RTR, annual monitoring costs are estimated at $5,625/plant/year. Cost data is from "Final Cost Impacts for the Primary Aluminum Production Source Category", September 1, 2015, EPA-HQ-OAR-0797-0423.

[g] 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 $110,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $200,000. 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 $310,000. These are the 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 such activities 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 $12,100.

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

Managerial	$68.37 (GS-13, Step 5, $42.73 + 60%)
Technical	$50.72 (GS-12, Step 1, $31.70 + 60%)
Clerical	$27.46 (GS-6, Step 3, $17.16 + 60%)

These rates are from the Office of Personnel Management (OPM), 2020 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA

Burden and Cost – NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (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 8 existing respondents will be subject to these standards. It is estimated that no additional new respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 8 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 [a]	(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	8	0	0	8
2	0	8	0	0	8
3	0	8	0	0	8
Average	0	8	0	0	8

[a] 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 8.

The total number of annual responses per year is calculated using the following table:

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Notification of applicability	0	1	N/A	0

Notification of construction/ reconstruction	0	1	N/A	0
Notification of actual startup	0	1	N/A	0
Notification of initial performance test	0	1	N/A	0
Notification of compliance status/approach	0	1	N/A	0
Report of performance tests	8	1	N/A	8
Semiannual report of monitoring exceedances	0.8	2	N/A	1.6
Semiannual report of no excess emissions	7.2	2	N/A	14.4
Startup, shutdown, malfunction report	1	2	N/A	2
Submit a design specification for pitch storage tank controls	0	1	N/A	0
		Total (rounded)		**26**

The number of Total Annual Responses is 26.

The total annual labor costs are $6,130,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (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 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 52,300 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (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 2,012 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $310,000. 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 245 labor hours at a cost of $12,100; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (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

There is a decrease in burden from the most-recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The adjustment decrease in burden from the most-recently approved ICR is due to a decrease in the number of sources. The currently-approved ICR assumed 11 respondents. Consultations with the Aluminum Association conducted during the renewal of this ICR revealed that there are only eight primary aluminum reduction plants currently subject to this subpart. This decrease in the number of respondents has resulted in a decrease in respondent labor hours. This ICR adjusts the capital cost from the previously-approved ICR to reflect costs from the October 15, 2015 rule, which were annualized over a 15 year period; the previous ICR assumed that all capital costs were completed within the first three years of the 2015 final rule. This ICR also adjusts the operation and maintenance (O&M) costs from the previous ICR from 1997 dollars to 2019 dollars using the CEPCI CE Index, and includes O&M costs for annual monitoring from the 2015 final rule that were inadvertently excluded from the previous ICR. Therefore, this ICR reflects a modest increase in capital and O&M costs from the most-recently approved ICR. This ICR also corrects the total number of responses to reflect the submittal of performance test reports on a semiannual basis, which were inadvertently excluded from the previous ICR. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (March 2020) to calculate respondent burden costs. This ICR, by in large, reflects the on-going burden and costs for existing facilities. Activities for existing sources include annual and semiannual performance tests, continuous monitoring of pollutants, and the submission of semiannual reports.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information

is estimated to average 2,012 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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-2013-0348. 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-2013-0348 and OMB Control Number 2060-0360 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 Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (Renewal)

Burden Item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (F=Ex0.05)	(G) Clerical person-hours per year (G=Ex0.1)	(H) Cost ($) [b]
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Reporting Requirements								
A. Familiarization with regulatory requirements [c]								
New Sources	4	1	4	0	0	0	0	$0
Existing Sources	2	1	2	8	16	0.8	1.6	$2,158.49
B. Required activities								
Acquisition, Installation, and Utilization of Technology and Systems	8	1	8	0	0	0	0	$0
Initial performance test [d]	100	1	100	0	0	0	0	$0
Annual performance tests [d, e]	100	13.09	1,309	8	10,472	523.6	1047.2	$1,412,730.40
Semiannual performance tests for TF and PM [f, g]	200	10	2,000	8	16,000	800	1,600	$2,158,488.00
Semiannual POM testing [f, g]	100	6.36	636	8	5,088	254.4	508.8	$686,399.18
Semiannual performance test (CEM or Alcan cassette) [h, i]	40	2.18	87.2	8	697.6	34.88	69.76	$94,110.08
Quarterly performance test [j, k]	200	16	3,200	0	0	0	0	$0
Daily Monitoring	2	730	1,460	8	11,680	584	1,168	$1,575,696.24
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write report	See 3B							
Notification of applicability	2	1	2	0	0	0	0	$0

Notification of construction/reconstruction	2	1	2	0	0	0	0	$0
Notification of actual startup	2	1	2	0	0	0	0	$0
Notification of special compliance requirements	N/A							
Notification of performance test	2	1	2	0	0	0	0	$0
Notification of compliance status	4	1	4	0	0	0	0	$0
Design specifications for pitch storage tank controls [l]	46	1	46	0	0	0	0	$0
NESHAP waiver application	N/A							
Report of performance test	See 3B							
Report of monitoring exceedances [m, n]	16	2	32	0.8	25.6	1.28	2.56	$3,453.58
Report of no excess emissions [m, o]	8	2	16	7.2	115.2	5.76	11.52	$15,541.11
Malfunction report [m, p]	8	2	16	1	16	0.8	1.6	$2,158.49
Subtotal for Reporting Requirements					**50,727**			**$5,950,736**
4. Recordkeeping Requirements								
A. Familiarization with regulatory requirements	See 3B							
B. Plan activities	N/A							
C. Implement activities (COS calculations)	1	11	11	8	88	4.4	8.8	$11,871.68
D. Develop record system	N/A							
E. Time to enter information								
Records of all information required by standards [q]	3	52	156	8	1,248	62.4	124.8	$168,362.06
F. Time to train personnel	N/A							
G. Time to adjust existing ways to comply with previously applicable requirements	N/A							
H. Time to transmit or disclose information [m, r]	1	2	2	8	16	0.8	1.6	$2,158.49
I. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					**1,555**			**$182,392**
TOTAL LABOR BURDEN AND COST (rounded) [s]					**52,300**			**$6,130,000**
TOTAL CAPITAL AND O&M COSTS (rounded) [s]								**$310,000**

GRAND TOTAL (rounded) [s]								**$6,440,000**

Assumptions:

[a] Assumes that there is an average of 8 respondents per year subject to the standards and that no additional respondents per year will become subject to the standards.

[b] This ICR uses the following labor rates for privately-owned sources: $148.45 for managerial, $121.46 for technical, and $60.23 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, "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.

[c] We have assumed all existing respondents will have to familiarize with the regulatory requirements each year.

[d] Assumes it takes 100 hours to complete each required TF, POM, PM, and Hg test for primary controls of potlines, bake furnaces and paste production plants.

[e] We assume an average of 13.09 tests per facility (primary control systems). This estimate is based on the Final Cost Impacts for the Primary Aluminum Production Source Category for the 2015 amendments which estimates: 35 potlines and 8 pitch storage tanks will require annual POM testing; 37 potlines, 12 anode bake furnaces, and 10 paste production plants will require annual PM testing; 12 anode bake furnaces will require annual Hg testing; and 30 potlines will require annual testing for TF (Note: there are a total of 37 potlines that require TF testing; however, 7 potlines are located in states that already required testing). (35+8+37+12+10+12+30 =144 tests at 11 facilities = 13.09 tests/facility).

[f] Assumes it takes 200 hours to test for secondary TF and PM emissions from potlines and 100 hours to test for secondary POM emissions from potlines.

[g] We assume an average of 10 tests per facility for PM and 6.36 tests per facility for POM secondary emissions from potlines. This estimate is based on the Final Cost Impacts for the Primary Aluminum Production Source Category for the 2015 amendments which estimates: 35 potlines will require semiannual POM testing; 37 potlines will require semiannual PM testing; and 18 potlines will require semiannual testing for TF (Note: there are a total of 37 potlines that require TF testing; however, 7 potlines are located in states that already required testing and 12 potlines do not have manifolds installed and will use the Method 14A Alcan Cassette test). [(37+18) x 2 tests/year = 110 TF and PM tests/year at 11 facilities = 10 tests/facility. 35 x 2 tests/yr = 70 POM tests/year at 11 facilities = 6.36 tests/facility].

[h] Assumes it takes 40 hours for testing of similar potlines (CEM or Alcan cassette).

[i] Assumes 2.18 tests per facility, based on estimates from the Final Cost Impacts for the Primary Aluminum Production Source Category for the 2015 amendments which estimates that 12 potlines will not have manifolds installed and will use Alcan Cassette tests. (12x2/11 = 2.18 tests/facility).

[j] Assumes it takes 200 hours for a Method 315 test for secondary emissions at Soderberg plants.

[k] Per the Final Cost Impacts for the Primary Aluminum Production Source Category for the 2015 amendments the only remaining Soderberg plant in the U.S. has announced permanent shutdown. Therefore, no Soderberg plants will require quarterly testing.

[l] Assumes that all existing sources have design specifications for pitch storage tank controls in place.

[m] This rule requires that all existing respondents submit semiannual reports. Performance test results will be submitted with the semiannual reports.

[n] Assumes that 10 percent of the 8 plants (0.1×8 = 0.8 will have excess emissions.

[o] Assumes that the remaining 90 percent of the 8 plants (0.9×8 = 7.2) will not have excess emissions.

[p] Assumes that 10 percent of plants per year (0.1×8 = 0.8, rounded to 1) will report a malfunction incident.

[q] Assumes it takes 3 hours per week per plant to enter monitoring data into records.

[r] Assumes it takes 1 hour to transmit recorded information.

[s] 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 Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL) (Renewal)

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant-year (C=AxB)	(D) Plants per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (F=Ex0.05)	(G) Clerical person-hours per year (G=Ex0.1)	(H) Cost ($) [b]
New or reconstructed facilities [c]	2	1						
Notification of applicability	2	1	2	0	0	0	0	$0
Notification of construction and reconstruction	2	1	2	0	0	0	0	$0
Notification of actual startup	2	1	2	0	0	0	0	$0
Notification of special compliance requirements	N/A							
Notification of initial performance test	2	1	2	0	0	0	0	$0
Notification of compliance status	8	1	8	0	0	0	0	$0
Review design specifications for pitch storage tank controls [d]	10	1	10	0	0	0	0	$0
Existing facilities								
Review of performance test report [e]	11	2	22	8	176	8.8	17.6	$10,011.67
Review of excess emissions report [f]	8	1	8	0.8	6.4	0.32	0.64	$364.06
Review of no excess emissions report [g]	2	2	4	7.2	28.8	1.44	2.88	$1,638.27
Review of NESHAP waiver application	N/A							
Malfunction report [h]	2	1	2	1	2	0.1	0.2	$113.77
TOTAL (rounded) [i]					**245**			**$12,100**

Assumptions:

[a] Assumes that there is an average of 8 respondents per year subject to the standards and that no additional respondents per year will become subject to

the standards.

[b] This ICR uses the following labor rates: $68.37 for managerial, $50.72 for technical, and $27.46 for clerical labor. These rates are from the Office of Personnel Management (OPM), 2020 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.

[c] Assumes that there are no new or reconstructed sources over the three-year period of this ICR.

[d] Assumes that all existing sources have design specifications for pitch storage tank controls in place.

[e] Assumes that it will take 11 hours twice per year to review summary of performance tests requirements to be submitted by all 11 existing plants.

[f] Assumes that 10 percent of the 8 plants (0.1×8 = 0.8 will have excess emissions.

[g] Assumes that the remaining 90 percent of the 8 plants (0.9×8 = 7.2) will not have excess emissions.

[h] Assumes that 10 percent of plants per year (0.1×8 = 0.8, rounded to 1) will report a malfunction incident.

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