SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Primary Lead Smelting (40 CFR Part 63, Subpart TTT) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Primary Lead Smelting (40 CFR Part 63, Subpart TTT) (Renewal),
EPA ICR Number 1856.12, OMB Control Number 2060-0414.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Primary Lead Smelting (40 CFR Part 63, Subpart TTT) were proposed on April 17, 1998; promulgated on June 4, 1999; and amended on both November 15, 2011 and November 19, 2020[1]. These regulations apply to existing and new facilities engaged in producing lead metal from ore concentrates. The category includes, but is not limited to, the following smelting processes: sintering, reduction, preliminary treatment, refining and casting operations, process fugitive sources, and fugitive dust sources. 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 TTT.

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 five 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 “Affected Public” are facilities engaged in the smelting of lead from ores (primary lead smelters). 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 Lead Smelting (40 CFR Part 63, Subpart TTT) (Renewal). The ‘burden’ to the “Federal Government” is attributed entirely to work performed by either Federal employees or government contractors and may be

1 The most recent amendments (85 FR 73854) include notification and recordkeeping requirements that apply to sources choosing to reclassify to area source status and to sources that revert back to major source status, including a requirement for electronic notification. There is no additional burden associated with the amendments or the requirement for respondents to submit the notifications and reports electronically. These are existing requirements.

found at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Lead Smelting (40 CFR Part 63, Subpart TTT) (Renewal).

Over the next three years, no existing respondents are expected to be subject to the rule. Currently, there are no primary lead smelters operating in the U.S. (either owned by privately owned/held businesses or by either state, local, or tribal entities or the Federal government) and no new facilities are being planned. However, this ICR presents the burden for implementation of the rule, which is still effective, based on the assumption of one existing respondent. If a new primary lead smelter is built in the future, we expect it would meet NESHAP Subpart TTT applicability and become subject to this rule.

The Office of Management and Budget (OMB) approved the currently-active ICR without any "Terms of Clearance".

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, hazardous air pollutant emissions from facilities engaged in primary lead smelting 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 TTT.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the 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 these 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 these 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 quarterly and semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

The EPA is requiring that owners or operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b) and notifications of changes in information already provided required in 40 CFR 63.9(j) through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For the notifications required in 40 CFR 63.9(b) and 63.9(j), owners and operators would be required to upload a PDF of the required notifications.

3. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart TTT.

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* (86 FR 8634) on February 8, 2021. 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. EPA's internal Agency experts, EPA's Enforcement and Compliance History Online (ECHO database, and consultations confirmed there are not currently any sources subject to this NESHAP that are operating or expected to become operational. While there are not currently any primary lead smelters operating in the U.S. and no new facilities are being planned, this ICR assumes an average of one respondent for the purpose of estimating burden.

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 standards has been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both The Doe Run Company, at (314) 453-7100, and the Missouri Department of Natural Resources, at (573) 522-1188.

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, 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 that 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. The 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, 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 facilities engaged in primary lead processing. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3339, which corresponds to the North American Industry Classification System (NAICS) 331410 for Primary Nonferrous Metals, Smelting and Refining.

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 Lead Smelting (40 CFR Part 63, Subpart TTT) (Renewal).

A source must make the following reports:

Notifications	
Notification of performance test	§63.7(b)(1), §63.9(e), §63.1548(a)
Rescheduled of performance test	§63.7(b)(2), §63.1548(a)
Initial notification requirements	§63.9(b)(1), §63.1548(a)
Request for an extension of compliance with relevant standard	§63.9(c), §63.1548(a)

Notifications	
Additional notification requirements for sources with continuous monitoring systems	§63.9(g), §63.1548(a)
Notification of compliance status when a source becomes subject to the standard	§63.9(h), §63.1548(a)
Change in information already provided (electronic submission)	§63.9(j), §63.1548(a)
Electronic submission of notifications or reports	§63.9(k), §63.1548(a)
Notification of reclassification to area source status or to revert back to major source status (electronic submission)	§§63.9(b), 63.9(j)

Reports	
Application for approval of the construction or reconstruction of a new major affected source, or reconstruction of a major affected source	§63.5(d)
Progress reports for compliance extension (if applicable)	§63.6(i), §63.10(d)(4), §63.1549(d)
Performance test results	§63.10(d)(2), §63.1549(d)
Standard Operating Procedures Manual for baghouses and fugitive dust control	§63.1547(b), §63.1548(b)
Additional reporting requirements for sources with continuous monitoring systems	§63.10(e), §63.1549(d)
Report of quarterly compliance tests	§63.10(d)(2), §63.1546(a)
Semiannual reports	§63.1549(e)

A source must keep the following records:

Recordkeeping	
Maintain all reports and notifications for five years	§63.10(b)(1), §63.1549(b)
Any applicability determination that demonstrates why owner or operator believes source(s) is/are unaffected	§63.10(b)(3)
Records of maintenance of air pollution control equipment	§63.10(b)(2)(iii)
Records of flow monitoring system performance evaluations, malfunctions, calibrations, and adjustments	§§63.10(b)(2)(vi)-(xi)
Documentation required for waiver of recordkeeping or	§63.10(b)(2)(xii)

Recordkeeping	
reporting requirements (if applicable)	
Documentation of initial notifications	§63.10(b)(2)(xiv)
Additional recordkeeping requirements for sources with continuous monitoring systems	§§63.10(c)(1)-(9), §§63.10(c)(12)-(14)
Production records of the weight and lead content of unrefined lead, copper matte, and copper speiss	§63.1549(b)(1)
Records of bag leak detection system output	§63.1549(b)(2)
Records of bag leak detection system alarms and corrective actions	§63.1549(b)(3)
Records of fugitive dust control activities and baghouse inspections and maintenance	§63.1549(b)(4)
Records of doorway in-draft checks	§63.1549(b)(5)
Records of flow monitoring system output (if applicable)	§63.1549(b)(6)
Records of damper position checks (if applicable)	§63.1549(b)(7)
Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control equipment and monitoring equipment	§63.1549(b)(8)
Records of actions taken during periods of malfunction to minimize emissions	§63.1549(b)(9)

Electronic Reporting

There are no current primary lead smelters in the U.S. and therefore there are no current respondents. If a primary lead smelter is constructed, the respondents are expected to use monitoring equipment that automatically records parameter data. Although personnel at the affected facility would still evaluate the data, internal automation significantly reduces the burden associated with monitoring and recordkeeping at a plant site.

The General Provisions for all NESHAP rules were amended on November 19, 2020 (85 FR 73854). Sources subject to 40 CFR Part 63, Subpart TTT are required to submit electronically the initial notifications required in 40 CFR 63.9(b) and notifications of changes in information already provided required in 40 CFR 63.9(j) through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/). The notification is a one-time notification already required in 40 CFR 63.9(j) in the case where the facility is notifying of a change in major source status and is an upload of the currently-required notification in portable document format (PDF) file. For purposes of this ICR, it is assumed that there is no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically.

Electronic copies of records may also be maintained in order to satisfy federal record-keeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for lead, opacity, or for pressure drop and liquid supply pressure for baghouse or equivalent control device.
Perform initial performance test, Reference Method 1; 2, 2F, 2G; 3, 3A, 3B; 4; 12 or 29 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.
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 standard 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 quarterly and semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

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. 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

There are no small entities (i.e., small businesses) affected by this regulation. 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 Lead Smelting (40 CFR Part 63, Subpart TTT) (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 recordkeeping and reporting requirements is estimated to be 6,270 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulations, 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	$149.84 ($71.35 + 110%)
Technical	$122.66 ($58.41 + 110%)
Clerical	$60.88 ($28.99 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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 standards 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 these regulations. 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) Continuous Monitoring Device	(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)
Bag Leak detection system - continuous particulate matter sensor [a]	$10,500	0	$0	$6,500	1	$6,500
Flow monitors with high/low alarms [a]	$6,500	0	$0	$6,500	1	$6,500
Method 12 Performance Tests [b]	N/A			$156,000	1	$156,000
TOTAL [c]			**$0**			**$169,000**

[a] Assumption: $500 per year per monitoring system per baghouse; we assume the respondent has 13 baghouses.
[b] Assumption: $13,000 per test per stack, 12 tests per year across 3 stacks.
[c] 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 $169,000. This is the total of column G.

The average annual cost for capital/startup and/or operation and maintenance costs to industry over the next three years of the ICR is estimated to be $169,000. 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. The 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 $2,990.

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

Managerial $69.04 (GS-13, Step 5, $43.15 + 60%)

Technical $51.23 (GS-12, Step 1, $32.02 + 60%)
Clerical $27.73 (GS-6, Step 3, $17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 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 Lead Smelting (40 CFR Part 63, Subpart TTT) (Renewal).

6(d) Estimating the Respondent Universe and Total Burden and Costs

While no respondents are expected, this ICR assumes that, on average over the next three years, approximately one existing respondent will be subject to these standards for the purpose of estimating burden. 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 one 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	1	0	0	1
2	0	1	0	0	1
3	0	1	0	0	1
Average	0	1	0	0	1

[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 one.

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
Quarterly Reports	1	4	0	4
Semiannual Reports	1	2	0	2
			Total	6

The number of Total Annual Responses is 6.

The total annual labor costs are $743,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Lead Smelting (40 CFR Part 63, Subpart TTT) (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 6,270 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Lead Smelting (40 CFR Part 63, Subpart TTT) (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 1,045 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $169,000. 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 60 labor hours at a cost of $2,990; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Lead Smelting (40 CFR Part 63, Subpart TTT) (Renewal) (40 CFR Part 63, Subpart TTT) (Renewal).

We assume that the 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 no change in 'burden' from the most-recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This situation is due to two considerations: 1) the regulations have not changed significantly over the past three years and are not anticipated to change significantly over the next three years; and 2) the growth rate for this industry is either very low or non-existent, so there is no significant change in the overall burden. While there are not currently any primary lead smelters operating in the U.S. and no new facilities are being planned, this ICR continues to assume an average of one existing respondent for the purpose of estimating burden. Since there are no significant changes in the regulatory requirements and there is no significant industry growth, there are also no changes in the capital/startup and/or operation and maintenance (O&M) costs. There is a slight increase in costs, which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (September 2020) to calculate respondent burden costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 1,045 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-OAR-2020-0636. 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-OAR-2020-0636 and OMB Control Number 2060-0414 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 Lead Smelting (40 CFR Part 63, Subpart TTT) (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 (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost 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. Reporting Requirements								
A. Familiarization with Regulatory Requirements	2	1	2	1	2	0.1	0.2	$272.48
B. Required activities:								
i. Initial Performance tests: [c]	8	1	8	0	0	0	0	$0
ii. Monitoring of operations and equipment: [d]								
- Implement baghouses SOP	13.4	365	4,891	1	4,891	244	489	$666,349.84
- Quarterly compliance stack tests for lead compounds								
Main stack	8	4	32	1	32	1.6	3.2	$4,359.68
Furnace area stack	8	4	32	1	32	1.6	3.2	$4,359.68
Refining building stack	8	4	32	1	32	1.6	3.2	$4,359.68
D. Gather Existing Information	See 4B and 5E							
E. Write report [c]								
i. Notification of compliance status [c]	2	1	2	0	0	0	0	$0
ii. Notification of actual startup [c]	2	1	2	0	0	0	0	$0

iii. Notification of construction/ reconstruction [c]	2	1	2	0	0	0	0	$0
iv. Notification of Performance Test [c]	2	1	2	0	0	0	0	$0
v. Notification of actual startup [c]	2	1	2	0	0	0	0	$0
vi. Reports of performance test results	4	1	4	0	0	0	0	$0
vii. Operation and maintenance reports	10	1	10	0	0	0	0	$0
viii. Semi-annual reports [e]	16	2	32	1	32	1.6	3.2	$4,359.68
[f] ix. Notification of physical/operational changes	2	1	2	0	0	0	0	$0
x. Submit quarterly reports	16	4	64	1	64	3.2	6.4	$8,719.36
Subtotal for Reporting Requirements					***5,848***			***$692,780***
5. Recordkeeping Requirements								
A. Familiarize with Regulatory 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:	1	365	365	1	365	18.3	36.5	$49,727.60
- Records of operating parameters								
- Records of compliance inspections								
- Records of performance tests								
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					***420***			***$49,728***

Total Labor Burden and Costs (rounded) [g]					**6,270**			**$743,000**
Total Capital and O&M Cost (rounded) [g]								**$169,000**
GRAND TOTAL (rounded) [g]								**$912,000**

Assumptions:

[a] While no sources are currently subject to the standard, for the purposes of this ICR, we have assumed that there is an estimated average one existing respondent which is subject to NSPS Subpart TTT since it is still in effect. We have assumed that there will be no new net growth for this industry over the three-year period of this ICR.

[b] This ICR uses the following labor rates: $122.66 (technical), $149.84 (managerial), and $60.88 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, "Table 2. Civilian workers, by occupational and industry group." The rates are from column 1, "Total compensation." They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

[c] Since there are no new sources, the initial rule requirements do not apply (e.g. initial performance test using Method 12 for lead emissions and initial sinter building in-draft compliance demonstration).

[d] Monitoring of operations includes: 1) implementation of Standard Operating Procedures (SOP) for operation and maintenance of baghouses on a daily basis such that its bag leak detection system does not alarm more than five percent of the time in any 6-month period, which we have assumed takes about 13.4 labor hours per 24 hour day to implement the monitoring and recordkeeping requirements; 2) a quarterly compliance tests for lead compounds; 3) and the monitoring of sinter building in-draft for which the operators are given three options to comply including: daily checks for in-draft at all doorway openings using an anemometer or equivalent device; establish and maintain the ventilation exhaust rate and damper positions at settings that result in an in-draft at each open doorway; or an alternative monitoring method.

[e] We have assumed that sources will continue to submit semiannual reports.

[f] We are assuming that sources will not be changing operating parameters even when sources may purchase new equipment.

[g] 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 Lead Smelting (40 CFR Part 63, Subpart TTT) (Renewal)

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (AxB)	(D) Plants 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) Cost, $ [b]
Initial notification [c]	2	1	2	0	0	0	0	$0
Notification of performance test [c]	0.5	4	2	0	0	0	0	$0
Notification of physical or Operational changes [c]	4	1	4	0	0	0	0	$0
Semi-annual reports	10	2	20	1	20	1	2	$1,149.10
Review quarterly test results	8	4	32	1	32	1.6	3.2	$1,838.56
TOTAL (rounded)[d]:					**60**			**$2,990**

Assumptions:

[a] While no sources are currently subject to the standard, for the purposes of this ICR, we have assumed that there is an average of one existing respondent currently operating in the United States since the NSPS Subpart TTT rule is still in effect. 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: $51.23 (technical), $69.04 (managerial), and $27.73 (clerical). These rates are from the Office of Personnel Management (OPM), 2021 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] While no sources are currently subject to the standard, for the purposes of this ICR burden, we have not included an estimate for any of the initial rule requirements.

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