

**Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Copper Smelters (40 CFR**

Burden item	(A)	(B)	(C)	(D)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting requirements				
A. Familiarize with regulatory requirements <sup>c</sup>	16	1	16	2
B. Required activities				
Conduct PM performance test <sup>d</sup>	120	4.5	540	2
Conduct copper converter building performance test <sup>e</sup>	240	1	240	2
C. Create information	See 3B & 4E			
D. Gather existing information	See 3B & 4E			
E. Write Report				
Initial notification	8	1	8	0
Notification of performance test	2	5.5	11	2
Initial compliance determination	40	1	40	0
Performance test reports <sup>f</sup>	80	5.5	440	2
Semiannual compliance reports <sup>g</sup>	40	2	80	2
Startup, shutdown, malfunction report <sup>h</sup>	8	1	8	0
<b>Subtotal for Reporting Requirements</b>				
4. Recordkeeping requirements				
A. Familiarize with regulatory requirements <sup>c</sup>	40	1	40	2
B. Plan activities	100	1	100	0
C. Implement Activities				
i. Prepare startup, shutdown, malfunction plan	80	1	80	0
ii. Copper concentrate dryer				
Monitor control device parameters <sup>i</sup>	0.5	365	182.5	2
iii. Smelting vessel				
Inspect tapping hood system <sup>j</sup>	4	12	48	2
Monitor control device parameters <sup>i</sup>	0.5	365	182.5	2
iv. Slag cleaning vessel				
Inspect tapping hood system <sup>j,k</sup>	4	12	48	1
Monitor control device parameters <sup>i,k</sup>	0.5	365	182.5	1
v. Batch copper converters				
Inspect converter hood system <sup>j</sup>	4	12	48	2
Monitor hood system ventilation parameters <sup>i</sup>	0.5	365	182.5	2
Monitor control device parameters <sup>i</sup>	0.5	365	182.5	2
vi. Prepare fugitive dust control plan	100	1	100	0
D. Develop record system	100	1	100	0
E. Time to enter information <sup>l</sup>	1	365	365	2

F. Time to train personnel <sup>m</sup>	100	1	100	2
<b>Subtotal for Recordkeeping Requirements</b>				
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>n</sup></b>				
<b>CAPITAL AND O&amp;M COST (rounded) <sup>n</sup></b>				
<b>GRAND TOTAL (rounded) <sup>n</sup></b>				

**Assumptions:**

- <sup>a</sup> We have assumed that there are approximately two sources that are subject to the standard, with no new additional sources
- <sup>b</sup> This ICR uses the following labor rates: \$149.84 per hour for Executive, Administrative, and Managerial labor; \$122.66 per hour for other labor
- <sup>c</sup> We have assumed that all respondents will have to familiarize with the regulatory requirements each year.
- <sup>d</sup> We have assumed that both of the respondents will take 120 hours, 4.5 times per year to conduct performance tests for PM
- <sup>e</sup> We have assumed that both of the respondents will take 240 hours to conduct copper converter building performance test
- <sup>f</sup> We have assumed that each respondents will take eighty hours, 5.5 times per year to complete a performance test report.
- <sup>g</sup> We have assumed that it will take each respondent forty hours to write the semiannual compliance reports.
- <sup>h</sup> We have assumed no respondents will have a startup, shutdown, or malfunction that is not consistent with the SSM plan.
- <sup>i</sup> Recordkeeping requirements are required daily on all monitor control device parameters.
- <sup>j</sup> We have assumed that inspections on all hood systems are done on a monthly basis.
- <sup>k</sup> We have assumed that one of the two existing sources will be equipped with a slag cleaning vessel.
- <sup>l</sup> Each respondent is required to record information on a daily basis.
- <sup>m</sup> We have assumed that it will take each of the respondent 100 hours to train personnel once a year.
- <sup>n</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Part 63, Subpart QQQ) (Renewal)**

122.66      149.84      60.88

(E)	(F)	(G)	(H)
Technical person-hours per year (E=CxD)	Management person hours per year (F=Ex0.05)	Clerical person hours per year (G=Ex0.1)	Total Cost per year (\$) <sup>b</sup>
32	1.6	3.2	\$4,359.68
1,080	54	108	\$147,139.20
480	24	48	\$65,395.20
0	0	0	\$0
22	1.1	2.2	\$2,997.28
0	0	0	\$0
880	44	88	\$119,891.20
160	8	16	\$21,798.40
0	0	0	\$0
<b>3,052</b>			<b>\$361,581</b>
80	4	8	\$10,899.20
0	0	0	\$0
0	0	0	\$0
365	18.25	36.5	\$49,727.60
96	4.8	9.6	\$13,079.04
365	18.25	36.5	\$49,727.60
48	2.4	4.8	\$6,539.52
182.5	9.13	18.25	\$24,863.80
96	4.8	9.6	\$13,079.04
365	18.25	36.5	\$49,727.60
365	18.25	36.5	\$49,727.60
0	0	0	\$0
0	0	0	\$0
730	36.5	73	\$99,455.20

200	10	20	\$27,248.00
<b>3,326</b>			<b>\$394,074</b>
<b>6,380</b>			<b>\$756,000</b>
			<b>\$5,480</b>
			<b>\$761,000</b>

responses hr/response  
26 245.38462

s expected over the next three years.

per hour for Technical labor, and \$60.88 per hour for Clerical labor. These rates are from the United States Department of ]

I as required under 40 CFR 63.1453.

once per year.

Labor, Bureau of Labor Statistics, September 2020, Table 2. Civilian Workers, by Occupational and Industry group. Th

e rates are from column 1, Total Compensation. The rates have been increased by 110 percent to account for the benefit packag

ges available to those employed by private industry.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Copper Smelters (40 CFR 51.23)**

51.23

Activity	(A)	(B)	(C)	(D)	(E)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>	Technical person-hours per year (E=CxD)
Activity	N/A				
Review reports					
a. Initial notifications	2	1	2	0	0
b. Notification of performance test <sup>c</sup>	2	5.5	11	2	22
c. Initial compliance determination	8	1	8	0	0
d. Performance test reports <sup>d</sup>	16	5.5	88	2	176
e. Semiannual compliance reports <sup>e</sup>	8	2	16	2	32
f. Report of SSM <sup>f</sup>	8	1	8	0	0
<b>TOTAL ANNUAL BURDEN AND COST (rounded) <sup>g</sup></b>					

**Assumptions:**

- <sup>a</sup> We have assumed that there are approximately two sources that are subject to the standard, with no new additional sources.
- <sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government costs.
- <sup>c</sup> We have assumed that EPA will take two hours to review each notification of performance test.
- <sup>d</sup> We have assumed that EPA will take 16 hours to review each performance test report.
- <sup>e</sup> We have assumed that EPA will take eight hours to review each semiannual compliance report.
- <sup>f</sup> We have assumed no respondents will have a startup, shutdown, or malfunction that is not consistent with the SSM plan.
- <sup>g</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



**FR Part 63, Subpart QQQ (Renewal)**

69.04      27.73

(F)	(G)	(H)
<b>Management person-hours per year (F=Ex0.05)</b>	<b>Clerical person-hours per year (G=Ex0.1)</b>	<b>Cost, (\$) <sup>b</sup></b>
0	0	\$0
1.1	2.2	\$1,264.01
0	0	\$0
8.8	17.6	\$10,112.08
1.6	3.2	\$1,838.56
0	0	\$0
<b>265</b>		<b>\$13,200</b>

as expected over the next three years.

management overhead expenses: \$69.04 Managerial rate (GS-13, Step 5, \$43.15 x 1.6), \$51.23 Technical rate (GS-12, Step 1, \$32.0

)2 x 1.6), and \$27.73 Clerical rate (GS-6, Step 3, \$17.33 x 1.6). These rates are from the Office of Personnel Management

at (OPM) 2021 General Schedule which excludes locality rates of pay.