

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Primary Copper Smelting Area Sources
(40 CFR Part 63, Subpart EEEEE) (Proposed Amendments)
December 2020**

Part A of the Supporting Statement

1. Identification of the Information Collection

1(a) Title of the Information Collection

“National Emission Standards for Hazardous Air Pollutants for Primary Copper Smelting Area Sources (Proposed Amendments),” EPA Information Collection Request (ICR) Number 2240.07, OMB Control Number 2060-0596.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Primary Copper Smelting Area Sources was proposed on October 6, 2006, promulgated on January 23, 2007, and amended on July 3, 2007. These regulations apply to each existing and new copper concentrate dryer, smelting vessel, converting vessel, matte drying and grinding plant, secondary gas system and anode refining department located at a primary copper smelting facility that is an area source of hazardous air pollutant (HAP) emissions. Area sources of HAP emissions are sites that emit less than 9.07 megagrams (10 tons) per year of a single HAP or less than 22.68 megagrams (25 tons) per year of any combination of HAPs. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart EEEEE.

In general, all NESHAP require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. Owners/operators are also required to maintain records of the occurrence and duration of any failures to meet applicable standards, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential to the United States Environmental Protection Agency (EPA), or its delegated authority, in determining compliance with NESHAP, and are required of all sources subject to NESHAP. Semiannual compliance and monitoring reports are also required.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least 5 years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the EPA regional office.

The proposed technology review amendments to the rule remove the startup, shutdown, and malfunction (SSM) exemption and specify that standards apply at all times; and require electronic reporting of performance test results and notification of compliance status. The remaining portions of

the NESHAP remain unchanged.

All the primary copper smelting facilities in the United States are owned and operated by the primary copper smelting industry (aka: the “Affected Public”). None of these facilities in the United States are owned by any government entities, including state, local, tribal, and Federal governments. They are all privately-owned, for-profit commercial businesses. We assume that they will all respond to EPA inquiries. The “burden” to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Copper Smelting Area Sources (40 CFR Part 63, Subpart EEEEEEE). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and can be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Copper Smelting Area Sources (40 CFR Part 63, Subpart EEEEEEE).

There is one area source facility subject to the standard. These estimates are based on the research conducted by the EPA during the subpart EEEEEEE technology review rulemaking and consultation with the industry.

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 (CAA), 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, HAP emissions from primary copper 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 EEEEEEE.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in this standard ensure compliance with the applicable regulations which were promulgated in accordance with the CAA. The collected information is also used for targeting inspections and as evidence in legal proceedings. Performance tests are required to determine an affected facility's initial capability to comply with the emission standard. Continuous monitoring systems are used to ensure compliance with these standards at all times. 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 these same 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.

The PM testing, monitoring, recordkeeping, and reporting requirements with which existing primary copper smelting area source is required to comply under the NESHAP are the same as the requirements that are in the facility's current title V operating permit. The only additional information collection requirements that would apply to area sources would consist of initial notifications, reporting, and recordkeeping requirements. The requirements for an SSM plan are being removed in this proposal as are other SSM requirements.

3. Nonduplication, Consultations, and Other Collection Criteria

The recordkeeping and reporting requested is required under 40 CFR Part 63, Subpart EEEEEEE.

3(a) Nonduplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. The submission process can be simplified through the electronic reporting included in this rule. As owners and operators of affected facilities are required to submit their specified reports electronically to the Compliance and Emissions Data Reporting Interface (CEDRI), air agency staff at the regional, state and local levels will all have access to data within their jurisdiction immediately upon submittal if they are registered in CEDRI. For those who choose not to register, the data can be accessed following a processing period in CEDRI via the EPA's Web Factor and Information Retrieval (WebFIRE) database, where it is publicly accessible. Therefore, there is no duplication of reporting requirements.

3(b) Public Notice Required Prior to ICR Submission to OMB

This section is not applicable because this is a rule-related ICR. Nevertheless, the ICR will be available for public review during the public comment period following publication of the proposed Subpart EEEEEEE amendments in the *Federal Register*.

3(c) Consultations

The Agency has consulted with all the primary copper smelting facilities as well as the Arizona Department of Environmental Quality, EPA region 9, and Indian tribal officials. The growth rate for the industry is based on our consultations with industry representatives as well as with the Agency's internal industry experts to project the number of affected facilities and industry growth over the next three years. Further stakeholder and public input are expected through public comment following publication of the proposed amendments to Subpart EEEEEEE in the *Federal Register* and follow-up meetings with interested stakeholders.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the 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 and the proposed RTR amendments 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 and the proposed RTR amendments do not violate any of the regulations established by OMB under 5 CFR 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least 5 years. This is consistent with the General Provisions as applied to these standards. EPA believes that the 5-year records retention requirement is consistent with the Part 70 permit program and the 5-year statute of limitations on which the permit program is based. The retention of records for 5 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 5 years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records in the absence of the 5-year maintenance requirement.

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

None of the reporting or recordkeeping requirements or the proposed RTR amendments contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements are primary copper smelting facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3331 which corresponds to the North American Industry Classification System (NAICS) 331410 for Nonferrous Metal (except Aluminum) Smelting and Refining.

Standard (40 CFR Part 63, Subpart EEEEEEE)	NAICS Codes
Primary Copper Smelting Area Sources	331410

4(b) Information Requested

(i) Data Items

All data in this ICR that are recorded and/or reported are required by 40 CFR Part 63, Subpart EEEEEEE or would be required under the proposed amendments. Subpart EEEEEEE references 40 CFR Part 63, Subpart A for several general reporting and recordkeeping requirements that apply for all NESHAP.

A source must make the following notifications and reports:

Notifications	
Initial notification	63.9(b)
Notification of performance test	63.(9)(b)
Notification of compliance status (through CEDRI using ERT)	63.11150(b) - (d), 63.9(h)
Notification of deviations	63.11147(d),
Notification of emergency situation	63.11147(c)

Reports	
Performance test reports (through CEDRI using ERT)	63.11148(i),
Compliance status report	63.11149(c), 63.9(h),
Monthly PM emissions report	63.11147(b)
Semiannual monitoring reports	63.11147(e)
Excess emissions and monitoring systems performance report and summary report every calendar quarter.	63.11148(h)

A source must keep the following records:

Recordkeeping	
Records of all required monitoring data and support information.	63.11147(f)
Records of PM monitoring results	63.11147(b)
Records of the activities to assure proper operation and maintenance of the air pollution control equipment and monitoring systems	63.11147(f), 63.11149(c)
Records of alarms for each bag leak detection system and description of corrective actions taken following each bag leak detection alarm	63.11148(c)
Records of the calculations of daily PM averages with supporting information, including measurements of the weight of copper concentrate feed charged to the smelting vessel, and collected PM CEMS data	63.11149(c)
Records of affected unit failures to meet an applicable standard	63.11149(c)

The recordkeeping requirements in 40 CFR 63.10 generally apply to new sources but not existing sources.

Electronic Reporting

As part of the proposed RTR amendments, respondents are required to use the EPA's Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. For purposes of this ICR, it is assumed that there will be no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically.

(ii) Respondent Activities

The respondent activities required by Subpart EEEEEEE are listed in the following table.

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate COMS for opacity and bag leak detection system
Conduct initial performance tests and repeat performance test if necessary.
Write the notifications and reports listed above.

Respondent Activities
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of 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
Observe performance tests and repeat performance tests if necessary.
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 Integrated Compliance Information System (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. Periodic 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. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. 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 5 years.

5(c) Small Entity Flexibility

All the respondents are large entities (i.e., large businesses). There are no small businesses operating Primary Copper Smelting facilities.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Average Annual Respondent Burden and Cost – NESHAP for Primary Copper Smelting Area Sources (40 CFR Part 63, Subpart EEEEE) (Proposed Amendments).

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 not conduct or 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 3 years from these recordkeeping and reporting requirements and the proposed RTR amendments is estimated to be 9 hours per year (Total Labor Hours from Table 1). 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 for Subpart EEEEEEE, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Civilian Worker Rates	Labor Rates, \$/hr ^a	110% Overhead	Total, \$/hr
Managerial	\$69.73	\$76.70	\$146.43
Technical	\$57.48	\$63.23	\$119.71
Clerical	\$28.23	\$31.05	\$59.28

^a https://www.bls.gov/news.release/archives/ecec_03192020.pdf

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2019, “Employer Costs for Employee Compensation – December 2019, Table 2. Employer Costs for Employee Compensation for 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 O&M Costs

The only costs to the regulated industry resulting from information collection activities required by the subject standards are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance (O&M) 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 \$670.

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

Agency Worker Rates	Labor Rates, \$/hr ^a	60% Overhead	Total, \$/hr
Managerial (GS-13, step 5)	\$41.64	\$24.98	\$66.62
Technical (GS-12, step 1)	\$30.90	\$18.54	\$49.44
Clerical (GS-6, step 3)	\$16.72	\$10.03	\$26.75

^a https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS_h.pdf

These rates are from the Office of Personnel Management (OPM), 2019 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. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Copper Smelting Area Sources (40 CFR Part 63, Subpart EEEEE) (Proposed Amendments).

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

Based on our research for this ICR, there is 1 existing source currently subject to the standard, all of which will keep records and submit reports. The average number of respondents is calculated using the following table that addresses the 3 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 and reconstructed affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the 3-year period of this ICR is 1.

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

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)

Total Annual Responses				
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	0	0	0
Notification of compliance status (through CEDRI using ERT)	0	0	0	0
Notification of intent to construct a major source and review application	0	0	0	0
Notification of actual startup	0	0	0	0
Notification of performance test	1	1	0	1
Annual compliance reports	1	1	0	1
Report of performance test (through CEDRI using ERT)	1	1	0	1
			Total	3

The number of Total Annual Responses is 3, all of which will be submitted electronically.

The total annual labor costs are \$1,060. Details regarding these estimates may be found below in Table 1: Average Annual Respondent Burden and Cost – NESHAP for Primary Copper Smelting Area Sources (40 CFR Part 63, Subpart EEEEEEE) (Proposed Amendments).

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 below, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 9 at a cost of \$1,060. Details regarding these estimates may be found in Table 1: Average Annual Respondent Burden and Cost – NESHAP for Primary Copper Smelting Area Sources (40 CFR Part 63, Subpart EEEEEEE) (Proposed Amendments).

We assume that burdens for managerial tasks take 5 percent 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 percent 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 31 hours per response.

(ii) The Agency Tally

The average annual Agency burden and cost over the next 3 years are estimated to be 14 labor hours and \$670. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Copper Smelting Area Sources (40 CFR Part 63, Subpart EEEEEEE) (Proposed Amendments).

We assume that burdens for managerial tasks take 5 percent 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 percent 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

This ICR is prepared for proposed amendments to the NESHAP for Primary Copper Smelting Area Sources (40 CFR, Part 63, Subpart EEEEEEE). These proposed RTR amendments: (1) adjust references to the Part 63 General Provisions (40 CFR, Part 63, Subpart A) and revise provisions in the NESHAP (40 CFR Part 63, Subpart EEEEEEE) to remove the SSM exemption and SSM plan requirement; (2) add electronic submittal of notification of compliance status and performance test reports; and (3) make technical and editorial changes. Where applicable, adjustments for these proposed RTR amendments are reflected in Tables 1 and 2 of this ICR.

Costs per labor hour have increased due to increases in Technical, Managerial, and Clerical labor rates. The proposed amendments to remove the exemptions for SSM and require that the standards apply at all time are not expected to affect the reporting and recordkeeping burden. Based on the EPA's knowledge of the processes and engineering judgement, malfunctions in the Primary Copper Smelting source category are considered unlikely to result in a violation of the standard. Affected sources at primary copper smelting plants are controlled with add-on air pollution control devices which will continue to function in the event of a process upset. Also, processes in the industry are typically equipped with controls that will not allow startup of the emission source until the associated control device is operating and will be shut down the emission source if the associated controls malfunction. Furnaces used in primary copper smelting, which are the largest sources of HAP emissions, typically operate continuously for long periods of time with no significant spikes in emissions. These minimal fluctuations in emissions are controlled by the existing add-on air pollution control devices used at all plants in the industry.

The other proposed amendment would require the use of EPA's electronic reporting system to submit performance tests and compliance reports. For purposes of this ICR, it is assumed that there will be no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 1 hour per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information 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 not conduct or 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, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2017-0664. 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 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 EPA Docket Center, EPA 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) 566-1742. Send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, NW, Washington, DC 20503. Please include the EPA Docket ID Number EPA-HQ-OAR-2002-0083 and OMB Control Number 2060-0517 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in data collection associated with the rule.

Table 1: Average Annual Respondent Burden and Cost – NESHAP for Primary Copper Smelting Area Sources (40 CFR Part 63, Subpart EEEEE) (Proposed Amendments)

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) Respondent s per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost per Year, \$ ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
a. Familiarize with regulatory requirements ^d	8	1	8	1	8	0.4	0.8	\$1,063.68
b. Required activities								
Monitor per Title V permit ^c	2	1	2	0	0	0	0	\$0
Initial/repeat performance tests ^e	4	1	4	0	0	0	0	\$0
Initial notification of applicability ^h	4	1	4	0	0	0	0	\$0.00
Initial notification of compliance status ^{f, h}	8	1	8	0	0	0	0	\$0.00
Reports per Title V permit ^c	2	1	2	0	0	0	0	\$0
c. Create information	See 3B							
d. Gather existing information	See 3B							
e. Write report	See 3B							
Subtotal for Reporting Requirements						9		\$1,064
4 Recordkeeping requirements								
a. Familiarize with regulatory requirements	See 3A							
b. Plan activities	See 3A							
c. Implement activities	See 3A							
d. Record all data required by Title V permit ^c	0.25	1	0.25	0	0	0	0	\$0
e. Time to transmit or disclose information ^c	0.25	1	0.25	0	0	0	0	\$0
f. Time to train personnel	4	1	4	0	0	0	0	\$0
g. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						0		\$0

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) Respondent s per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost per Year, \$ ^b
TOTAL LABOR BURDEN AND COST (rounded)^g					9			\$1,060
CAPITAL AND O&M COST (rounded)^g								\$0
GRAND TOTAL (rounded)^g								\$1,060
Assumptions:								

Assumptions:

^a We have assumed that the number of respondents potentially subject to this rule is one. Each year one respondents are anticipated to effect process changes requiring notification to the Agency regarding applicability and compliance status. The source is an area source. There will be no additional new sources over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$146.43 per hour for Executive, Administrative, and Managerial labor; \$119.71 per hour for Technical labor, and \$59.285 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2018, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c We have assumed that no hours or costs are associated with this burden item because existing plant complies with the requirement as part of their Title V operating permit.

^d We have assumed that each year it will take eight hours for each respondent to familiarize with regulatory requirements.

^e We have assumed that an existing facility may certify initial compliance based on previous PM test; no new test is required.

^f We have assumed that it will take eight hours for each respondent to complete the initial notification of compliance status report.

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

^h These requirements are one-time requirements that apply to new respondents. There are no new respondents estimated over the 3-year period of this ICR.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Copper Smelting Area Sources (40 CFR Part 63, Subpart EEEEE) (Proposed Amendments)

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant 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) Total Cost per Year, \$ ^b
1. Report review								
a. Initial notification of applicability ^c	2	1	2	2	4	0.2	0.4	\$221.78
b. Initial notification of compliance status ^d	4	1	4	2	8	0.4	0.8	\$443.57
TOTAL ANNUAL BURDEN AND COST					14			\$665
TOTAL ANNUAL BURDEN AND COST (rounded)^e								\$670

Assumptions:

^a We have assumed that the average number of respondents potentially subject to this rule will be five. Each year two respondents are anticipated to effect process changes requiring notification to the Agency regarding applicability and compliance status. They are all area sources. There will be no additional new sources over the three-year period of this ICR.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$66.62 Managerial rate (GS-13, Step 5, \$41.64 x 1.6), \$49.44 Technical rate (GS-12, Step 1, \$30.90 x 1.6), and \$26.75 Clerical rate (GS-6, Step 3, \$16.72 x 1.6). These rates are from the Office of Personnel Management (OPM) 2014 General Schedule, which excludes locality rates of pay.

^c We have assumed that it will take 2 hours to review the initial notification of applicability report.

^d We have assumed that it will take 4 hours to review the initial notification of compliance status report.