

Table 1: Annual Respondent Burden and Cost - NESHAP for Area Sources: Primary Copper Smelting

119.71

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)
1. Applications	N/A				
2. Surveys and studies	N/A				
3. Reporting requirements					
a. Familiarize with regulatory requirements ^d	8	1	8	1	8
b. Required activities					
Monitor per Title V permit ^c	2	1	2	0	0
Initial/repeat performance tests ^e	4	1	4	0	0
Initial notification of applicability ^h	4	1	4	0	0
Initial notification of compliance status ^{f, h}	8	1	8	0	0
Reports per Title V permit ^c	2	1	2	0	0
c. Create information	See 3B				
d. Gather existing information	See 3B				
e. Write report	See 3B				
Subtotal for Reporting Requirements					
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
e. Time to transmit or disclose information ^c	0.25	1	0.25	0	0
f. Time to train personnel	4	1	4	0	0
g. Time for audits	N/A				
Subtotal for Recordkeeping Requirements					
TOTAL LABOR BURDEN AND COST					
CAPITAL AND O&M COST (rounded)^g					
GRAND TOTAL (rounded)^g					

Assumptions:

^a We have assumed that the number of respondents potentially subject to this rule is one. Each year one respondents are anticipated by the Agency regarding applicability and compliance status. The source is an area source. There will be no additional new source.

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

^c We have assumed that no hours or costs are associated with this burden item because existing plant complies with the requirements.

^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 period.

146.43

59.28

(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost per Year, \$ ^b
0.4	0.8	\$1,063.68
0	0	\$0
0	0	\$0
0	0	\$0.00
0	0	\$0.00
0	0	\$0
9		\$1,064
0	0	\$0
0	0	\$0
0	0	\$0
0		\$0
9		\$1,064
		\$0
		\$1,060

No. of responses
9.2

Hours per response
1 hr/response

ated to effect process changes requiring notification to
s over the three-year period of this ICR.

hour for Technical labor, and \$59.285 per hour for
: 2. Civilian Workers, by Occupational and Industry
t packages available to those employed by private

ment as part of their Title V operating permit.

ort.

e 3-year period of this ICR.

Table 2: Average Annual EPA Burden and Cost - NESHAP for Area Sources: Primary Copper Smelting, Second

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
1. Report review				
a. Initial notification of applicability ^c	2	1	2	2
b. Initial notification of compliance status ^d	4	1	4	2
TOTAL ANNUAL BURDEN AND COST				
TOTAL ANNUAL BURDEN AND COST (rounded)^e				

Assumptions:

^a We have assumed that the average number of respondents potentially subject to this rule will be five. Each year two respondents will submit an initial notification to the Agency regarding applicability and compliance status. They are all area sources. There will be no add

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for gov 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) (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.

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

Primary Copper Smelting, and Primary Nonferrous Metals-Zinc, Cadmium, and Beryllium (Renewal)

49.44 66.62 26.75

(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
4	0.2	0.4	\$221.78
8	0.4	0.8	\$443.57
14			\$665
			\$670

Respondents are anticipated to effect process changes requiring additional new sources over the three-year period of this ICR.

Government overhead expenses: \$66.62 Managerial rate (GS-13, Step 5). These rates are from the Office of Personnel Management