

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS Review for Lead Acid Battery Manufacturing Plants
(40 CFR Part 60, Subpart KKa)
February 2022**

Part A of the Supporting Statement

1. Identification of the Information Collection

1(a) Title of the Information Collection

“NSPS for Lead Acid Battery Manufacturing Plants for which Construction, Modification or Reconstruction Commenced After [DATE OF PUBLICATION OF THE PROPOSED RULE IN THE FEDERAL REGISTER] (40 CFR Part 60, Subpart KKa).” This is a new information collection request (ICR). The EPA ICR tracking number for 40 CFR Part 60, Subpart KK is 1072.14. The OMB control number is 2060-0081.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Lead-Acid Battery Manufacturing (40 CFR Part 60, Subpart KK) were proposed on January 14, 1980, promulgated on April 16, 1982, and most recently amended on February 27, 2014. This information collection is for a new subpart, 40 CFR Part 60, Subpart KKa, which will apply to emission units which commence construction, modification, or reconstruction after the proposal date for 40 CFR Part 60, Subpart KKa. These standards apply to the following facilities at lead acid battery manufacturing plants with a production capacity that is greater than or equal to 6.5 tons of lead per day: grid casting facilities, paste mixing facilities, three-process operation facilities, lead-oxide manufacturing facilities, lead reclamation facilities, and other lead-emitting operations. This information is being collected to assure compliance with 40 CFR Part 60, Subpart KKa.

In general, all NSPS 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 NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain the file for at least two 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’s (EPA) regional offices.

Compared to a related NSPS (40 CFR Part 60, Subpart KK), 40 CFR Part 60, Subpart

KKa has different lead emission limits for grid casting, paste mixing, and lead reclamation operations; increases the frequency of fabric filter inspections; clarifies the activities that are considered to be lead reclamation activities; adds the following requirements: repeat performance testing, work practices to minimize emissions of fugitive lead dust, bag leak detection systems for facilities above a certain size, electronic reporting of performance test results and semiannual compliance reports; and removes exemptions for periods of start-up, shut down, and malfunction.

Potential respondents are owners and operators of new, modified, or reconstructed facilities (i.e., grid casting facilities, paste mixing facilities, three-process operation facilities, lead-oxide manufacturing facilities, lead reclamation facilities, and other lead-emitting operations) at lead acid battery manufacturing plants with a production capacity that is greater than or equal to 6.5 tons of lead per day. It is estimated that zero lead acid battery manufacturing plants will have new, modified, or reconstructed emission units that become subject to 40 CFR Part 60, Subpart KKa in the next three years.

All of the lead acid battery manufacturing plants in the United States are owned and operated by the lead acid battery manufacturing industry (the “Affected Public”). There are approximately 40 existing lead acid battery manufacturing facilities, which are owned and operated by the lead acid battery manufacturing industry. None of the 40 facilities in the United States are owned by either state, local, tribal or the Federal government. The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Lead Acid Battery Manufacturing Plants for which Construction, Modification or Reconstruction Commenced After [DATE OF PUBLICATION OF THE PROPOSED RULE IN THE FEDERAL REGISTER] (40 CFR Part 60, Subpart KKa). The burden to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NSPS for Lead Acid Battery Manufacturing Plants for which Construction, Modification or Reconstruction Commenced After [DATE OF PUBLICATION OF THE PROPOSED RULE IN THE FEDERAL REGISTER] (40 CFR Part 60, Subpart KKa).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

... the degree of emission limitation achievable through the application of the best system of emissions reduction which (taking into account the cost of achieving such reduction and any nonair quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(1).

The Agency refers to this charge as selecting the best system of emission reduction

(BSER). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years. 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, lead emissions from lead acid battery manufacturing either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart KK. As a result of the review required by CAA Section 111, the EPA is proposing revised standards at 40 CFR Part 60, Subpart KKa that will apply to facilities that are new, modified, or reconstructed after the proposal date.

2(b) Practical Utility/Users of the Data

The control of lead emissions from lead acid battery manufacturing plants not only requires the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of lead from lead acid battery manufacturing plants are the result of the operation of the affected facilities.

The standards are achieved by the reduction of pollutant emissions using process changes, control technologies, and work practice standards. The notifications required in these standards are used to inform either the Agency or its 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 and that these standards are being met. Performance tests are needed, as these are the Agency's record of a facility's initial and ongoing capability to comply with the emission standards and note the operating conditions under which compliance was achieved. Continuous emission monitors are used to ensure compliance with the 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 recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations. The collected information is also used for targeting inspections and as evidence in legal proceedings. 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 information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NSPS operate their processes and control equipment in a manner that achieves compliance with the NSPS. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the CAA.

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

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

The ICR will be available for public review during the public comment period following publication of the proposed NSPS review in the *Federal Register*.

3(c) Consultations

During development of the NSPS revisions, the EPA held conference calls and exchanged information with representatives of the lead acid battery manufacturing industry, including the Battery Council International (BCI). Projections of the number of new, modified, and reconstructed affected sources expected to be subject to the new Subpart KKa were discussed with the industry representatives prior to development of this ICR.

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.

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 and/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 lead acid battery manufacturing plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3691, which corresponds to the North American Industry Classification System (NAICS) code 335911 for Storage Battery Manufacturing.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NSPS for Lead Acid Battery Manufacturing for which Construction, Modification or Reconstruction Commenced After [DATE OF PUBLICATION OF THE PROPOSED RULE IN THE FEDERAL REGISTER] (40 CFR Part 60, Subpart KKa).

A source must make the following reports:

Notifications

Notification of construction/reconstruction	§60.7(a)(1)
Notification of initial startup	§60.7(a)(3)
Notification of initial performance test	§60.8(d)
Physical or operational change	§60.7(a)(4)
Submit fugitive dust mitigation plan	§60.372a(c)(1)

Reports

Report opacity results (reported with the initial performance test results) and at other times opacity observations are required	§60.11(e)
Report of performance test results	§60.8(a), 60.375a(b)
Periodic reports if using continuous emissions monitoring systems	§60.7(c)-(e); §60.375a(c)

A source must keep the following records:

Recordkeeping

Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	§60.7(b)
Performance test records	§60.7(d)
Pressure drop monitoring records for sources using a scrubber system	§60.375a(a)
Fabric filter inspection and maintenance record and pressure drop records for facilities using fabric filters	§60.375a(a)
Opacity measurements	§60.375a(a)
Bag leak detection system records	§60.375a(a)
Fugitive dust cleaning records	§60.375a(a)
Records of failures to meet an applicable standard	§60.375a(a)
Maintain records for at least two years	§60.7(f)

Electronic Reporting

Currently, some plants use 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.

As part of the proposed 40 CFR Part 60, Subpart KKa standards, respondents are required to use the EPA’s Electronic Reporting Tool (ERT) to create performance test reports and a spreadsheet template to create the semiannual excess emissions and continuous monitoring system performance and summary reports then submit those reports through the EPA’s Compliance and Emissions Data Reporting Interface (CEDRI). Performance test results collected using test methods that are supported by the ERT at the time of the test must be submitted in the format generated through the use of the ERT or an electronic file consistent with the xml schema on the ERT website. Other performance test results must be submitted in portable document format (PDF) using the attachment module of the ERT. For the semiannual excess emissions and continuous monitoring system performance and summary reports, the proposed rule requires that owners and operators use the appropriate spreadsheet template to submit information to CEDRI. The use of CEDRI reflects the reporting elements required by the rule and does not impose

additional reporting elements. For purposes of this ICR, it is assumed that there will be no additional burden associated with the requirement for respondents to submit the notifications and reports electronically.

(ii) Respondent Activities

Respondent Activities
Read and understand the rule requirements.
Install, calibrate, maintain, and operate required monitoring devices.
Conduct initial and repeat performance tests using specified EPA Reference Methods 9, 12, or 29.
Write the notifications and reports listed above.
Develop a record system and 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

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 and ongoing 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 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. 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 two years.

5(c) Small Entity Flexibility

The impact on small entities (i.e., small businesses) was taken into consideration during the development of the proposed standards for 40 CFR Part 60, Subpart KKa. 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 below at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Lead Acid Battery Manufacturing Plants for which Construction, Modification or Reconstruction Commenced After [DATE OF PUBLICATION OF THE PROPOSED RULE IN

THE FEDERAL REGISTER] (40 CFR Part 60, Subpart KKa).

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 0 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 NSPS program, the previously approved ICR for subpart KK, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$126.95 (\$60.45 + 110%)
Technical	\$66.11 (\$31.48 + 110%)
Clerical	\$45.23 (\$21.54 + 110%)

These labor rates are mean hourly wages from the United States Department of Labor, Bureau of Labor Statistics, May 2020 National Occupational Employment and Wage Estimates for the United States for Production Occupations (https://www.bls.gov/oes/2020/may/oes_nat.htm#51-0000) (the most recent available), using occupational codes 51-000 for plant and system operators (technical), 11-1021 for general and operations managers (managerial) and 43-6010 for secretaries and administrative assistants (clerical). 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 and performance testing. The capital/startup costs are one-time costs when a facility becomes subject to the regulation and include startup costs for continuous

monitoring systems (CMS) and the purchase of stack testing services. The annual O&M costs are the ongoing costs to operate and maintain the monitor and the cost for 5-year repeat stack tests (which are not incurred during the initial 3-year ICR period but would be incurred in future ICR renewal years).

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

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

(A) Continuous Monitoring Device	(B) Average Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Average Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Fabric Filter Pressure Drop Monitors ¹	\$350	0	\$0	\$900	0	\$0
Bag Leak Detection System	\$386,000	0	\$0	\$45,300	0	\$0
Initial Performance Tests – Method 9 and 12 or 29	\$28,500	0	\$0	\$0	0	\$0
Repeat Performance Tests – Method 9 and 12 or 29 (every 5 years)	\$28,500	0	\$0	\$0	0	\$0

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

It is assumed that new facilities would use fabric filters as control systems and that facilities that are modified or reconstructed would either already have a scrubber system pressure drop monitor or would install a fabric filter control system.

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 \$0. 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 \$0.

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 \$0.

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), 2022 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 below at the end of this document in Table 2: Average Annual EPA Burden and Cost – NSPS for Lead Acid Battery Manufacturing Plants for which Construction, Modification or Reconstruction Commenced After [DATE OF PUBLICATION OF THE PROPOSED RULE IN THE FEDERAL REGISTER] (40 CFR Part 60, Subpart KKa).

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

It is estimated that there will be no lead acid battery manufacturing plants that will have new, modified, or reconstructed facilities that become subject to 40 CFR Part 60, Subpart KKa in the next three years. The total annual labor costs are \$0. Details regarding these estimates may be found below in Table 1: Annual Respondents Burden and Cost – NSPS for Lead Acid Battery Manufacturing Plants for which Construction, Modification or Reconstruction Commenced After [DATE OF PUBLICATION OF THE PROPOSED RULE IN THE FEDERAL REGISTER] (40 CFR Part 60, Subpart KKa).

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 below in Tables 1 and 2 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 0 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Lead Acid Battery Manufacturing Plants for which Construction, Modification or Reconstruction Commenced After [DATE OF PUBLICATION OF THE PROPOSED RULE IN THE FEDERAL REGISTER] (40 CFR Part 60, Subpart KKa).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 0 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. 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 0 labor hours at a cost of \$0; see below in Table 2: NSPS for Lead Acid Battery Manufacturing Plants for which Construction, Modification or Reconstruction Commenced After [DATE OF PUBLICATION OF THE PROPOSED RULE IN THE FEDERAL REGISTER] (40 CFR Part

60, Subpart KKa).

6(f) Reasons for Change in Burden

There is no change in burden because this is a new Information Collection.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 0 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-2021-0619. 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-2021-0619 and OMB Control Number 2060-0081 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 – NSPS for Lead Acid Battery Manufacturing Plants for which Construction, Modification or Reconstruction Commenced After [DATE OF PUBLICATION OF THE PROPOSED RULE IN THE FEDERAL REGISTER] (40 CFR Part 60, Subpart KKa).

Burden item	(A) Person hours per occurrence ^e	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person-hours per year (Cx D)	(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. Reporting Requirements								
A. Familiarization with the regulatory requirements	30	1	30	0	0	0	0	\$0
B. Required Activities								
Performance test ^c	3	1	3	0	0	0	0	\$0
Monitoring of emissions and operations	See 4E							
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write Report								
Notification of construction/reconstruction/modification	2	1	2	0	0	0	0	\$0
Notification of initial startup	2	1	2	0	0	0	0	\$0
Notification of CMS demonstration	2	1	2	0	0	0	0	\$0
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Report of performance test	See 3B							
Semiannual reports ^d	2	2	4	0	0.00	0.00	0.00	\$0.00
Subtotal for Reporting Requirements					0.00			\$0.00
4. Recordkeeping requirements								
A. Familiarization with the regulatory requirements	See 3A							

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents 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) Total Cost Per year ^b
B. Plan activities	See 3A							
C. Implement Activities	See 3B							
D. Develop record system	40							
E. Time to enter information								
Records monitoring of emissions and operations ^e	0.5	365	182.5	0	0.0	0	0	\$0.00
Records of startups, shutdowns, malfunctions, etc.	2	1	2	0	0	0	0	\$0.00
F. Train Personnel	N/A							
G. Audits	N/A							
Subtotal for Recordkeeping Requirements						0		\$0.00
TOTAL LABOR BURDEN AND COST (rounded) ^f						0		\$0
TOTAL CAPITAL AND O&M COSTS (rounded): ^f								\$0
GRAND TOTAL: ^f								\$0

Assumptions:

^a There are no existing facilities subject to the NSPS KKa (they are subject to another NSPS) and no facilities are projected to become subject to the NSPS KKa during the 3-year term of this ICR.

^b The labor rates are mean hourly wages from the United States Department of Labor, Bureau of Labor Statistics, May 2020 National Occupational Employment and Wage Estimates for the United States for Production Occupations (https://www.bls.gov/oes/2020/may/oes_nat.htm#51-0000) (the most recent available), using occupational codes 51-000 for plant and system operators (technical), 11-1021 for general and operations managers (managerial) and 43-6010 for secretaries and administrative assistants (clerical). The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c Includes notification of test and submission of report.

^d Semiannual reports are required by this rule for those sources that have to install continuous monitoring systems. We have assumed that 10% of the sources have CMS.

^e We have assumed that 10% of the sources have CMS.

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

Table 2: Average Annual EPA Burden and Cost – NSPS for Lead Acid Battery Manufacturing Plants for which Construction, Modification or Reconstruction Commenced After [DATE OF PUBLICATION OF THE PROPOSED RULE IN THE FEDERAL REGISTER] (40 CFR Part 60, Subpart KKa).

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 (Cx D)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, \$ ^b
Notification of construction/reconstruction	2	0.33	0.66	0	0	0	0	\$0
Notification of initial startup	2	0.33	0.66	0	0	0	0	\$0
Notification of CMS demonstration	1	0.33	0.33	0	0	0	0	\$0
Review Notification of Performance Test	1	1	1.00	0	0	0	0	\$0
Review Performance Test results	1	1	1.00	0	0	0	0	\$0
Review of Semi-annual Reports ^c	2	2	4	0	0	0	0	\$0
TOTAL COST (rounded)^d						0		\$0

Assumptions:

^a There are no existing facilities subject to the NSPS KKa (they are subject to another NSPS) and no facilities are projected to become subject to the NSPS KKa during the 3-year term of this ICR.

^b If there had been labor costs, the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses would have been used: \$70.56 for Managerial (GS-13, Step 5, \$44.10 x 1.6), \$52.37 for Technical (GS-12, Step 1, \$32.73 x 1.6), and \$28.34 for Clerical (GS-6, Step 3, \$17.71 x 1.6). These rates are from the Office of Personnel Management (OPM) 2022 General Schedule which excludes locality rates of pay.

^c We have assumed that 10 percent of sources would need to submit semi-annual reports.

^d Totals are rounded to 3 significant figures. Figures may not add exactly due to rounding.”