

Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Magnesium Refining (40 C

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences 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. Reporting requirements					
a. Familiarize with regulatory requirements	4	1	4	1	4
b. Process/review information	4	4	16	1	16
c. Write reports					
i. Initial notification	2	1	2	0	0
ii. Notification of compliance status ^c	2	1	2	1	2
iii. Notification of construction/reconstruction	2	1	2	0	0
iv. Notification of actual startup	2	1	2	0	0
v. Notification of performance test ^c	2	2	4	1	4
vi. Report of performance test ^{c,d}	180	2	360	1	360
vii. Semiannual report ^e	20	2	40	1	40
viii. Startup, shutdown, malfunction report	4	1	4	1	4
Subtotal for Reporting Requirements					
2. Recordkeeping requirements					
a. Familiarize with regulatory requirements	4	1	4	1	4
b. Plan activities	12	1	12	1	12
c. Implement activities	12	1	12	1	12
d. Time to train personnel	10	1	10	1	10
e. Time to enter information	-	-	-	-	-
f. Store, file, and maintain records ^f	1	365	365	1	365
g. Retrieve records/reports ^g	1	12	12	1	12
Subtotal for Recordkeeping Requirements					
Total Labor Burden and Costs (rounded) ^h					
Total Capital and O&M Costs (rounded) ^h					
Grand Total (rounded) ^h					

Assumptions:

^a There is one respondent subject to the rule, with no new sources expected over the next three years of this ICR.

^b This ICR uses the following labor rates: \$153.55 per hour for Executive, Administrative, and Managerial labor; \$122.20 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 1% available to those employed by private industry.

^c 40 CFR 63.9912 requires performance testing no less frequently than twice (at mid-term and renewal) of each term of the T emission point. For the U.S. Magnesium facility subject to this rule, we have assumed that 4 emission units must be tested two performance tests are conducted for approximately two emission units in each year in the three year period of this ICR. We assume that 4 units x 2 tests / 5 years = 1.6 units per year, 1.6 units x 0.20 = 0.32 units with repeat testing, 1.6 + 0.32 = 1.92 or consistent with an estimate of \$49,000 provided by the U.S. Magnesium facility.

^d We assume that this includes Method 23 test.

^e We assumed that it will take the respondent 20 hours two times per year to complete semiannual reports.

^f This includes inspection of unpaved areas.

^g We assume that it will take 1 hour once per month to retrieve records/reports.

^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Note that U.S. Magnesium estimate of \$130,000, but did not provide additional specific costs to explain this difference.

FR Part 63, Subpart TTTT) (Renewal)

(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Annual costs (\$) ^b
0.2	0.4	\$544.11
0.8	1.6	\$2,176.46
0	0	\$0
0.10	0.20	\$272.06
0	0	\$0
0	0	\$0
0.20	0.40	\$544.11
18	36	\$48,970.26
2	4	\$5,441.14
0.2	0.4	\$544.11
495		\$58,492
0.2	0.4	\$544.11
0.6	1.2	\$1,632.34
0.6	1.2	\$1,632.34
0.5	1	\$1,360.29
-	-	-
18.25	36.5	\$49,650.40
0.6	1.2	\$1,632.34
477		\$56,452
972		\$114,900
		\$1,200
		\$116,000

Labor Rates:	
Management	\$153.55
Technical	\$122.20
Clerical	\$61.51

<--round to

8 responses
121 hr/response

hour for Technical labor, and \$61.51 per
 "Table 2. Civilian Workers, by
 10% to account for the benefit packages

title V permit, or every 2.5 years, for each
 ice during the permit term, and that
 ssume that 20% of tests will need to be
 2 units per year.) This estimate is

provided a slightly higher total burden

Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Magnesium Refining (

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences 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. Initial performance test ^c	24	1.6	38.4	0	0
2. Repeat performance test ^c	24	0.32	7.68	0	0.00
3. Report review					0
a. Initial notification	8	1	8	0	0
b. Notification of performance test ^c	8	2	16	1	16.00
c. Notification of compliance status ^c	8	1	8	1	8
d. Notification of construction/reconstruction	8	1	8	0	0
e. Notification of actual startup	8	1	8	0	0
f. Report of performance test ^c	8	2	16	1	16.00
g. Semiannual report ^d	16	2	32	1	32
h. Startup, shutdown, malfunction report ^e	8	1	8	1	8
Total (rounded)^f					

Assumptions:

^a There is one respondent subject to this rule, with no new sources expected over the next three years of this ICR.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for gov Managerial rate of \$69.04 (GS-13, Step 5, \$43.15 + 60%), Technical rate of \$51.23 (GS-12, Step 1, \$32.02 + 60%), and C \$17.33 + 60%). These rates are from the Office of Personnel Management (OPM) “2020 General Schedule” which excluc

^c 40 CFR 63.9912 requires a performance testing no less frequently than twice (at mid-term and renewal) of each term of for each emission point. For the U.S. Magnesium facility subject to this rule, we have assumed that 4 emission units must and that performance tests are conducted for approximately two emission units in each year in the three year period of this need to be repeated. (4 units x 2 tests / 5 years = 1.6 units per year, 1.6 units x 0.20 = 0.32 units with repeat testing, 1.6 + assume that Agency personnel only attend initial and repeat of initial performance tests.

^d We have assumed that it would take 16 hours two times per year to review semiannual reports.

^e We have assumed that it will take eight hours once per year to review the startup, shutdown, malfunction report.

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

40 CFR Part 63, Subpart TTTTT (Renewal)

(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Annual costs (\$) ^b
0.00	0.00	\$0.00
0.00	0.00	\$0.00
0	0	\$0
0	0	\$0
0.80	1.60	\$935.28
0.40	0.80	\$467.64
0	0	\$0
0	0	\$0
0.80	1.60	\$935.28
1.6	3.2	\$1,870.56
0.4	0.8	\$467.64
92		\$4,680

Labor Rates:	
Management	\$69.04
Technical	\$51.23
Clerical	\$37.73

ernment overhead expenses:
 clerical rate of \$37.73 (GS-6, Step 3,
 des locality rates of pay.

the Title V permit, or every 2.5 years,
 be tested twice during the permit term,
 ; ICR. We assume that 20% of tests will
 0.32 = 1.92 or 2 units per year.) We