

ICR Summary Information

Hours per Response	696
Number of Respondents	3
Total Estimated Burden Hours	6,260
Total Estimated Costs	\$753,000
Annualized Capital O&M	\$1,500
Total Annual Responses	9
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NESHAP for Inorganic Arsenic Emissions from Primary Co

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 (Cx D)
1. Applications	N/A				
2. Surveys and studies	N/A				
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A				
4. Reporting Requirements					
A. Familiarization with regulatory requirements	1	1	1	3	3
B. Required activities	N/A				
C. Create information ^c					
i. Initial Method 5 performance test ^c	40	1	40	0	0
i. Grab Samples	4	365	1460	3	4380
ii. Method 108 Analysis	4	12	48	3	144
iii. Monthly Calculation	2	12	24	3	72
D. Gather existing information	See 4E				
E. Write report					
i. Quarterly report of excess opacity and flow rates ^d	16	2	32	3	96
ii. Annual report of converter charging rate	16	1	16	3	48
iii. Notification of performance test	1	1	1	0	0
Subtotal for Reporting					
5. Recordkeeping Requirements					
A. Familiarization with regulatory requirements	See 4A				
B. Plan activities	N/A				
C. Implement activities	See 4C				
D. Record data	8	1	8	3	24
E. Time to transmit or disclose information					
1. Record Method 108A analysis results	2	12	24	3	72
2. Monthly measurements	1.5	12	18	3	54
3. Daily log of converter operating mode and daily record of matte charge to converter	0.5	365	182.5	3	547.5
F. Time to train personnel	N/A				
G. Time for audits	N/A				
Subtotal for Recordkeeping					
TOTAL LABOR BURDEN AND COST ^e					

TOTAL ANNUAL COSTS (O&M) ^e					
GRAND TOTAL ^e					

^a It is assumed that there are 3 respondents currently operating in the United States. It is estimated that no additional three years based on information available on the sector.

^b This ICR uses the following labor rates: \$157.61 per hour for Executive, Administrative, and Managerial labor; \$12 Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2000 group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for industry.

^c The burden to report information includes labor to perform Method 108A analysis once a month; obtain a grab sample; perform monthly calculations. The estimated time to collect grab samples is 4 hours and the time for monthly calculations is 2 hours per facility subject to the NESHAP. The time to record results is 2 hours based on data provided by an individual facility.

^d It is assumed that respondents will only need to submit excess opacity or air flow rate reports twice a year.

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

opper Smelters (40 CFR Part 61, Subpart O) (Renewal)

(F) Managem ent person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year _b
0.15	0.3	\$414.22
0	0	\$0
219	438	\$604,757.55
7.2	14.4	\$19,882.44
3.6	7.2	\$9,941.22
4.8	9.6	\$13,254.96
2.4	4.8	\$6,627.48
0	0	\$0
5454		\$654,878
1.2	2.4	\$3,313.74
3.6	7.2	\$9,941.22
2.7	5.4	\$7,455.92
27.375	54.75	\$75,594.69
802		\$96,306
6,260		\$751,000

New Labor Rates

Managerial	157.61
Technical	123.94
Clerical	62.52

#hrs	6,260
#responses	9
hrs/response	696

6,260

		\$1,500
		\$753,000

respondents will become subject to the regulation in the next

3.94 per hour for Technical labor, and \$62.52 per hour for
2021, "Table 2: Civilian Workers, by Occupational and Industry
the benefit packages available to those employed by private

one daily; labor to reduce opacity and air flow data; and labor to
operations is 2 hours based on data provided by an individual
subject to the NESHAP.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Inorganic Arsenic Emissions from Primary Copper Smelters

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Facilities per year ^a	(D) Technical person-hours per year (CxD)	(E) Management person hours per year (Ex0.05)	(F) Clerical person hours per year (Ex0.1)	(G) Cost, \$
Report Review:							
Review of annual report of feed arsenic content	8	1	3	24	1.2	2.4	\$1,409.57
Review of quarterly excess emissions reports ^c	2	2	3	12	0.6	1.2	\$704.78
TOTAL BURDEN AND COST ^d					41		\$2,110

^a It is assumed that there are 3 respondents currently operating in the United States. It is estimated that no additional responder become subject to the regulation in the next three years based on information available on the sector.

^b This ICR uses the following labor rates: \$70.56 per hour for Managerial labor; \$52.37 per hour for Technical labor, and \$28.5 for Clerical labor. These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes rates of pay. The rates have been increased by 60% to account for the benefit packages available to government employees.

^c It is assumed that respondents will only need to submit excess opacity or air flow rate reports twice a year.

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

Contractors (40 CFR Part 61, Subpart O) (Renewal)

**New
Labor
Rates**

Managerial 70.56

Technical 52.37

Clerical 28.34

Contractors will

be paid \$28.34 per hour
for the locality

Capital/Startup vs. Operation and Maintenance			
(A)	(B)	(C)	(D)
Monitoring Requirement	Capital/Startup Cost for One Respondent	Number of New Respondents ^a	Total Capital/Startup Cost, (B X C)
Method 108A analyses of copper matte samples	\$0	0	\$0
Totals (rounded)			\$0

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

(O&M) Costs

(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M^b	Total O&M, (E X F)
\$500	3	\$1,500
		\$1,500

\$1,500

Total Annual Responses

(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents ^a	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(B \times C)+D$
Annual report of converter charging rate	3	1	0	3
Quarterly excess opacity and air flow rate reports	3	2	0	6
			Total	9

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ^a	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents
1	0	3	0	0
2	0	3	0	0
3	0	3	0	0
Average	0	3	0	0

^a New respondents include sources with constructed and reconstructed affected facilities.

(E)
Number of Respondents (E=A+B+C-D)
3
3
3
3