

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal), EPA ICR Number 1894.11, OMB Control Number 2060-0433.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) were proposed on February 11, 1999; and promulgated on March 23, 2000; and amended on the following dates: December 30, 2002 (67 FR 79808); September 3, 2004 (69 FR 53980); October 3, 2005 (70 FR 57513); December 19, 2005 (70 FR 75320); September 18, 2015 (80 FR 56700); and June 13, 2016 (81 FR 38085). These regulations apply to existing facilities and new facilities that are secondary aluminum production facilities and major sources of hazardous air pollutants (HAP) either commencing construction, or reconstruction, after the date of proposal. This includes facilities that operate aluminum scrap shredders, thermal chip dryers, scrap dryers/delacquering kilns/decoating kilns, group 1 furnaces, group 2 furnaces, sweat furnaces, dross only furnaces, rotary dross coolers, and secondary aluminum processing units (SAPUs). The SAPUs include group 1 furnaces and in-line fluxers. The regulations also apply to secondary aluminum production facilities that are area sources of HAP only with respect to emissions of dioxins/furans (D/F) from thermal chip dryers, scrap dryers/delacquering kilns/decoating kilns, group 1 furnaces, sweat furnaces, and SAPUs. New facilities include those that commenced either construction, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart RRR.

In general, all NESHAP 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 NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. If there is no such delegated authority, the EPA's regional offices can review

them. All other reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the EPA's regional offices. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

The "Affected Public" are secondary aluminum production facilities and major sources of hazardous air pollutants (HAP) either commencing construction, or reconstruction. This includes facilities that operate aluminum scrap shredders, thermal chip dryers, scrap dryers/delacquering kilns/decoating kilns, group 1 furnaces, group 2 furnaces, sweat furnaces, dross only furnaces, rotary dross coolers, and secondary aluminum processing units (SAPUs). The SAPUs include group 1 furnaces and in-line fluxers. The regulations also apply to secondary aluminum production facilities that are area sources of HAP only with respect to emissions of dioxins/furans (D/F) from thermal chip dryers, scrap dryers/delacquering kilns/decoating kilns, group 1 furnaces, sweat furnaces, and SAPUs. The 'burden' to the "Affected Public" may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal). 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 – NESHAP for NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal).

There are approximately 161 Secondary Aluminum Producer facilities, which are owned and operated by the secondary aluminum production industry. None of the 161 facilities in the United States are owned by either state, local, or tribal entities or by the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there are an average of 161 affected facilities at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 161 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

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, 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 either 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 secondary aluminum production 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 RRR.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with these emission standards. Continuous emission monitors are used to ensure compliance with these same 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 notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of these 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 the 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.

Additionally, the EPA is requiring electronic reporting for certain notifications or reports. The EPA is requiring that owners or operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b), changes in already provided information in 40 CFR 63.9(j), and performance test reports through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For the notifications required in 40 CFR 63.9(b) and 63.9(j), owners and operators would be required to upload a PDF of the required notifications.

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests. The EPA is also requiring that 40 CFR Part 63, Subpart RRR performance test reports be submitted through the EPA's ERT.

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

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart RRR.

3(a) Non-duplication

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as for state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for either reporting or for data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, 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 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

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (87 FR 20847) on April 8, 2022. No comments were received on the burden published in the *Federal Register* for this renewal.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial

and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 161 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the 'burden' associated with these standards as it was being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Aluminum Association, at (703) 358-2960, and the North American Die Casting Association (NADCA), at (847) 279-0001.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

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.

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

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 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 secondary aluminum production facilities. The United States Standard Industrial Classification (SIC) code and corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standard are listed below:

Standard (40 CFR Part 63, Subpart RRR)	SIC Codes	NAICS Codes
Secondary Smelting and Alloying of Aluminum	3341, 3399	331314
Primary Aluminum Production	3334	331313
Aluminum Sheet, Plate, and Foil Manufacturing	3353	331315
Aluminum Extruded Product Manufacturing	3354	331318
Other Aluminum Rolling and Drawing	3355	331318
Aluminum Die-Casting Foundries	3363	331523
Aluminum Foundries (except Die-Casting)	3365	331524

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR).

A source must make the following reports:

Notifications	
Initial notification that a source is subject to the standard	§63.9(b)(1)-(3), §63.1515(a)(1)-(2)
Anticipated and actual date of startup	§63.1515(a)(3)(iii)-(iv)
Intention to construct/reconstruct	§63.9(b)(4)-(5), §63.1515(a)(3)-(4)
Special compliance obligations for a new source	§63.9(d), §63.1515(a)

Notifications	
	(5)
Initial performance test and visible emission observations	§63.9(e)-(f), §63.10(d)(2)-(3), §63.1515(a)(6)
Reschedule initial performance test	§63.7(b)(2)
Demonstration of continuous monitoring systems	§63.9(g), §63.1515(a)(7)
Notification of changes in information (reclassification to area source status or to revert to major source status) (electronic submission)	§63.9(b), §63.9(j)

Reports	
Notification of compliance status report	§63.9(h), §63.1515(b)
Operation, maintenance, and monitoring plan for each emission unit to be approved by the permitting authority	§63.6(e)(1), §63.1515(b)(9)
Semiannual report	§63.10(e)(3)(i), §63.1516(b)
Performance test results (electronic submission)	§63.1516(b)(3)(i)
Annual compliance certification	§63.1516(c)

A source must keep the following records:

Recordkeeping	
Emission test results and other data needed to determine emissions	§61.13(g)
All reports and notifications	§63.10(b)
Record of applicability	§63.10(b)(3)
Records of total operating times and operating data (e.g., opacity, temperature, feed materials)	§63.1517(b)(1)-(5), (7),(9)-(12),(17)
Records of date and time of excess emissions, and a brief description of the cause and any corrective actions taken	§63.1517(b)(1)-(5)
Records of inspections	§63.1517(b)(2)(ii), (4),(13),(14)
Records for any approved alternative monitoring or test procedure	§63.1517(b)(15)

Recordkeeping	
Copies of all required plans, with records documenting conformance with the applicable plan	§63.1517(b)(8),(10), (16)
Records of any failure to meet a standard	§63.1517(b)(18)
Records of sources with continuous monitoring systems	§63.10(c), §63.1517(b)(6)
Records for startup and shutdown periods	§63.1517(b)(19)
Records of each change in furnace operating mode	§63.1517(b)(20)
Records are required to be retained for five years	§63.10(b)(1), §63.1517(a)(1)

Electronic Reporting

Some of the respondents are using 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.

The rule was amended to include electronic reporting provisions on September 18, 2015. 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), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). 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. Respondents are also required to submit electronic copies of notifications and certain reports through EPA's CEDRI. The notification is an upload of their currently-required notification in portable document format (PDF) file. For purposes of this ICR, it is assumed that there is no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate continuous parameter monitors (e.g., temperature monitors), continuous opacity monitors, flow monitors and bag leak detectors, if applicable.
Perform initial performance test, Reference Method 1, 2, 3, 4, 5, 9, 23, 25A, 26A test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
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

The 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 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. The 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 five years.

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of these regulations. 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 at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Secondary Aluminum Protection (40 CFR Part 63, Subpart RRR) (Renewal).

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 recordkeeping and reporting requirements is estimated to be 12,400 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulations, Agency knowledge and experience with the NESHAP program, the previously-approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$157.61 (\$75.05 + 110%)
Technical	\$123.94 (\$59.02 + 110%)
Clerical	\$62.52 (\$29.77 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2021, “Table 2. 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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard(s) are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to these regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C) ⁷	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F) ⁸

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
Bag leak detectors ¹	\$291,111	0	\$0	\$66,667	18	\$1,200,000
Flow Meters ²	\$3,000	0	\$0	\$0	0	\$0
Continuous opacity monitors ³	\$36,000	0	\$0	\$7,500	0	\$0
Temporary hoods ⁴	\$21,650	107	\$2,320,000	\$0	0	0
HF testing ⁵	\$0	0	\$0	\$11,000	8	\$88,000
Furnace testing ⁶	\$0	0	\$0	\$10,000	50	\$500,000
Temperature monitors ⁶	\$1,200	0	\$0	\$0	0	\$0
Totals (rounded)			\$2,320,000			\$1,790,000

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

- ¹ Assume that 34 percent of major sources (or 18 respondents) will use bag leak detectors on fabric filters with an average cost to industry at \$291,111. The actual cost of the bag leak detectors depends on the number of probes on the unit, and O&M costs for bag leak detectors is approximately \$66,667.
- ² All chlorine injection systems already have chlorine flow meters and the operation and maintenance costs are negligible.
- ³ Sources with fabric filters will be complying with the monitoring requirements through the use of a bag leak detector or visible emissions observations and not continuous opacity monitors.
- ⁴ An estimated 107 furnaces and 27 facilities would need temporary hoods installed every 5 years and testing conducted for a total capital cost of \$17.3 million and a total annualized capital cost of \$2.3 million. Total annualized cost per furnace would average \$21,650 per year.
- ⁵ An estimated 8 affected facilities would incur a total annual O&M cost of \$11,000 for measurement of hydrogen fluoride (HF) emissions.
- ⁶ Switching furnace classifications would result in total annual O&M costs for testing of \$500,000/yr or, for an estimated 50 furnaces, a cost of \$10,000 per furnace.
- ⁷ Temperature monitors will be installed at new sweat furnaces at a cost of \$1,200. The O&M costs for temperature monitors are negligible.
- ⁸ Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are \$2,320,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$1,179,000 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 \$4,110,000. These are the recordkeeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The 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 \$89,500.

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

Managerial	\$70.56 (GS-13, Step 5, \$44.10 + 60%)
Technical	\$52.37 (GS-12, Step 1, \$32.73 + 60%)
Clerical	\$28.34(GS-6, Step 3, \$17.17 + 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 at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Secondary Aluminum Protection (40 CFR Part 63, Subpart RRR) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 161 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 161 per year.

The number of respondents is calculated using the following table that addresses the three 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 ¹	(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	161	0	0	161

Number of Respondents					
2	0	161	0	0	161
3	0	161	0	0	161
Average	0	161	0	0	161

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 161.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of applicability	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of special compliance requirements	0	1	0	0
Notification of performance test	0	1	0	0
Notification of compliance status	53	1	0	53
Waiver application	0	1	0	0
Semiannual reports	161	2	0	322
Changing furnace classification	50	1	0	50
			Total	425

The number of Total Annual Responses is 425.

The total annual labor costs are \$1,480,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal).

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 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 12,400 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal).

We assume that burdens for managerial tasks take 5% 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% 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 29 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$4,110,000. 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 1,750 labor hours at a cost of \$89,500; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal).

We assume that burdens for managerial tasks take 5% 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% 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

There is no change in burden from the most recently-approved ICR as currently identified in the OMB Inventory of Approved Burdens. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for this industry is very low or non-existent, so there is no significant change in the overall burden. Since there are no changes in the regulatory requirements and there is no significant industry growth, there are also no changes in the capital/startup or operation and maintenance (O&M) costs. There is a slight increase in costs, which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (March 2020) to calculate respondent burden costs. There is a slight decrease in the number of responses, based on the correction of a mathematical error in the calculation of the number of responses from the currently approved ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 29 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-2022-0021. 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. Due to COVID-19 precautions, entry to the Reading Room is available by appointment only. Please contact personnel in the Reading Room to schedule an appointment. 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-2022-0021 and OMB Control Number 2060-0433 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 – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal)

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year ^a	Technical person-hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Cost Per year ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Acquisition, installation, and utilization of technology and systems ^c	54	1	54	0	0	0	0	\$0
4. Reporting requirements								
a. Familiarization with Regulatory Requirements ^d	1	1	1	161	161	8.05	16.1	\$22,229.67
b. Required activities								
Initial performance test ^{e, f}	24	1	24	0	0	0	0	\$0
Repeat performance test ^{e, f}	24	0.2	4.8	0	0	0	0	\$0
Operating, maintenance and monitoring plan ^{e, f}	32	1	32	0	0	0	0	\$0
Startup, shutdown, malfunction (SSM) plan ^g	N/A							
c. Create information	See 4B							
d. Gather existing information	See 4B							
e. Write report								
Notification of applicability ^{e, f}	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction	N/A							

Notification/report of actual startup	N/A							
Notification of special compliance requirements	N/A							
Notification of performance test ^e	2	1	2	0	0	0	0	\$0
Notification of compliance status ^e	4	1	4	53	212	10.6	21.2	\$29,271.37
Waiver application ^g	2	1	2	0	0	0	0	\$0
Report of performance test	See 4B							
Semiannual reports ^h	8	2	16	161	2,576	128.8	257.6	\$355,674.76
Changing furnace classification ⁱ	2	1	2	50	100	5	10	\$13,807.25
Subtotal for Reporting Requirements						3,506		\$420,983
5. Recordkeeping requirements								
a. Familiarization with Regulatory Requirements	See 4A							
b. Plan activities	See 4E							
c. Implement activities	See 4B							
Verify lime injection rate	0.1	36	3.6	161	579.6	28.98	57.96	\$80,026.82
Changing furnace classification ⁱ	2	1	2	50	100	5	10	\$13,807.25
d. Develop record system	N/A							
e. Time to enter/transmit information								
Records of all information required by the standards	N/A							
Major sources ^j	1.5	52	78	53	4,134	206.7	413.4	\$570,791.72
Area sources ^k	0.5	52	26	108	2,808	140.4	280.8	\$387,707.58
f. Time to train personnel	4	1	4	0	0	0	0	\$0

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g. Time to adjust existing ways to comply with previous applicable requirements	N/A							
h. Time to disclose information								
New sources ^m	0.25	2	0.5	0	0	0	0	\$0
All sources ⁿ	0.25	2	0.5	161	81	4.03	8.05	\$11,114.84
Sources that changed furnace classification ⁱ	1	1	1	50	50	2.5	5	\$6,903.63
i. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						8,857		\$1,063,448
TOTAL LABOR BURDEN AND COST (rounded)^o						12,400		\$1,480,000
Total Capital/O&M Costs (rounded)^o								\$4,110,000
Grand Total (Labor and Capital/O&M Costs)(rounded)^o								\$5,590,000

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be 161, of which 53 are major sources. There will be no additional new major or area sources over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$157.61 per hour for Executive, Administrative, and Managerial labor; \$123.94 per hour for Technical labor, and \$62.52 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2021, “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 it will take each new respondent 54 hours to complete the task. This burden cost is associated with the monitoring of all control equipment ensuring that respondents of new respondents meet the required specifications of this subpart. No additional new major or areas sources are anticipated over the three-year period of this ICR.

^d We have assumed that it will take each respondent one hour to read and understand the reporting requirements.

^e It is assumed that new area sources will comply by meeting the equipment specifications rather than by conducting performance tests. Respondents that are major sources are required to demonstrate initial compliance with the applicable emission limit, equipment, work practice, or operational standard for affected source or emission unit and report results in the notification of compliance status report. Since there are no new respondents estimated, the initial requirements do not apply.

^f Since we have assumed that there will be no new sources over the next three-year period of this ICR, there will be no new sources conducting initial

performance tests. We have determined that respondents of new area sources will not be required to conduct emissions testing to show compliance with the emission limit, since it was determined that sweat furnaces sold in the United States now have an afterburner installed and meet the design residence time of 0.8 seconds or greater and an operating temperature of 1600 °F or greater. All new respondents are required to submit for approval an operation, maintenance and monitoring plan for affected sources.

^g It is assumed that there will be no new sources requiring a waiver from the performance test requirements.

^h It is assumed that each respondent will take 8 hours to write semiannual report of excess emissions or no excess emissions.

ⁱ An estimated 50 facilities would change furnace classifications once per year.

^j It is assumed that it will take 1.5 hours for major source respondents to enter and transmit records.

^k It is assumed that it will take 0.5 hours for existing area source respondents to enter and transmit records.

^l We have assumed that it will take 4 hours to train new employees.

^m We have assumed that it will take 0.25 hours to each new respondent to disclose information.

ⁿ We have assumed that it will take 0.25 hours for each respondent to disclose information.

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

Table 2: Average Annual EPA Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal)

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year ^a	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
Initial performance tests	40	1.4	56	0	0	0	0	\$0
Report performance test including retesting ^c	48	1	48	0	0	0	0	\$0
Notification of applicability	0.5	1	0.5	0	0	0	0	\$0
Notification of construction/reconstruction	N/A							
Notification of actual startup	N/A							
Notification of special compliance requirements	N/A							
Notification of performance test	2	1	2	0	0	0	0	\$0
Notification of compliance status ^d	2	1	2	0	0	0	0	\$0
Report of performance test ^c	40	1	40	0	0	0	0	\$0
Repeat of performance test report ^c	40	1	40	0	0	0	0	\$0
Semiannual reports ^e	4	2	8	161	1288	64.4	128.8	\$75,646.82
Review performance test reports and reports from facilities changing furnace classification ^f	4	1	4	59	236	11.8	23.6	\$13,860.75
TOTAL ANNUAL BURDEN AND COST (rounded)^g					1,750			\$89,500

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be 161, of which 53 are major sources. There will be no additional new major or area 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:

Managerial rate of \$70.56 (GS-13, Step 5, \$44.10 + 60%), Technical rate of \$52.37 (GS-12, Step 1, \$32.73 + 60%), and Clerical rate of \$26.34 (GS-6, Step 3, \$17.17 + 60%). These rates are from the Office of Personnel Management (OPM) “2022 General Schedule” which excludes locality rates of pay.

^c We have assumed that all existing respondents are in compliance with the initial rule requirements. It is further assumed that new sweat furnaces will comply by meeting the equipment specification than by conducting performance test.

^d We have assumed that it will take 2 hours for each respondent to complete notification of compliance status.

^e We have assumed that each existing respondent will take 4 hours two times per year to complete the semiannual reports.

^f Assumes Agency will review all annual reports, including 4 HF tests/yr, 5 tests/yr for uncontrolled furnaces, and 50 reports/yr for changing furnace classification.

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