

ICR Summary Information

Hours per Response	21
Number of Respondents	3
Total Estimated Burden Hours	41
Total Estimated Costs	\$4,970
Annualized Capital O&M	\$0
Total Annual Responses	2
Form Number	Not Applicable

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

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a
1. Applications	N/A			
2. Surveys and studies	N/A			
3. Reporting requirements				
a. Familiarize with regulatory requirements ^d	8	1	8	3
b. Required activities				
Monitor per Title V permit ^c	2	1	2	0
Initial/repeat performance tests ^e	4	1	4	0
Initial notification of applicability	4	1	4	1
Initial notification of compliance status ^f	8	1	8	1
Reports per Title V permit ^c	2	1	2	0
c. Create information	See 3B			
d. Gather existing information	See 3B			
e. Write report	See 3B			
Subtotal for Reporting Requirements				
4 Recordkeeping requirements				
a. Familiarize with regulatory requirements	See 3A			
b. Plan activities	See 3A			
c. Implement activities	See 3A			
d. Record all data required by Title V permit ^c	0.25	1	0.25	0
e. Time to transmit or disclose information ^c	0.25	1	0.25	0
f. Time to train personnel	4	1	4	0
g. Time for audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded)^g				
CAPITAL AND O&M COST (rounded)^g				
GRAND TOTAL (rounded)^g				

Assumptions:

^a We have assumed that the average number of respondents potentially subject to this rule is three. Each year one re requiring notification to the Agency regarding applicability and compliance status. They are all area sources. There period of this ICR.

^b This ICR uses the following labor rates: \$157.61 per hour for Executive, Administrative, and Managerial labor; \$ hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, Sep occupational and industry group. The rates are from column 1, Total compensation. The rates have been increased l rates and the additional overhead business costs of employing workers beyond their wages and benefits, including b equipping their employees.

- ^c We have assumed that no hours or costs are associated with this burden item because existing plants comply with the permit.
- ^d We have assumed that it will take eight hours for each respondent to familiarize with regulatory requirements.
- ^e We have assumed that an existing facility may certify initial compliance based on previous PM test; no new test is required.
- ^f We have assumed that it will take eight hours for each respondent to complete the initial notification of compliance.
- ^g Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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

123.94 157.61 62.52

(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost per Year, \$ ^b
24	1.2	2.4	\$3,313.74
0	0	0	\$0
0	0	0	\$0
4	0.2	0.4	\$552.29
8	0.4	0.8	\$1,104.58
0	0	0	\$0
41			\$4,971
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0			\$0
41			\$4,970
			\$0
			\$4,970

41.4

21 hr/response

Respondent is anticipated to effect process changes
will be no additional new sources over the three-year

123.94 per hour for Technical labor, and \$62.52 per
September 2021, Table 2. Civilian Workers, by
by 110 percent to account for varying industry wage
business expenses associated with hiring, training, and

the requirement as part of their Title V operating

required.

status report.

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

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (C=AxB)	(D) Respondents per year ^a
1. Report review				
a. Initial notification of applicability ^c	2	1	2	1
b. Initial notification of compliance status ^d	4	1	4	1
TOTAL ANNUAL BURDEN AND COST (rounded)^e				

Assumptions:

^a We have assumed that the average number of respondents potentially subject to this rule will be three. Each year one respondent will require notification to the Agency regarding applicability and compliance status. They are all area sources. There will be a 3-year period of this ICR.

^b This cost is based on the following labor rates: \$70.56 Managerial rate (GS-13, Step 5, \$44.10 + 60%), \$52.37 Technician rate (GS-6, Step 3, \$17.17 + 60%). These rates are from the Office of Personnel Management (OPM), 2022 General Schedule. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

^c We have assumed that it will take 2 hours to review the initial notification of applicability report.

^d We have assumed that it will take 4 hours to review the initial notification of compliance status report.

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

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

52.37 70.56 28.34

(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Total Cost per Year, \$^b
2	0.1	0.2	\$117.46
4	0.2	0.4	\$234.93
7			\$352

Respondent is anticipated to effect process changes
 be no additional new sources over the three-year

al rate (GS-12, Step 1, \$32.73 + 60%), and \$28.34
 eral Schedule, which excludes locality rates of pay.

The only type of industry costs associated with the information collection activity in the regulations are lab
There are no capital/startup or operation and maintenance costs.

for costs.

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=(BxC)+D
Write reports				
Monitor per Title V permit	3	0	0	0
Notification of initial applicability	1	1	0	1
Initial/repeat performance tests	0	1	0	0
Notification of initial compliance status	1	1	0	1
Reports per Title V permit	0	1	0	0
			Total	2

^a We have assumed that the average number of respondents potentially subject to this rule is three. Each year one respondent is anticipated to effect process changes requiring notification to the Agency regarding applicability and compliance status. They are all area sources. There will be no additional new sources over the three-year period of this ICR.

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	1	3	0	1
2	1	3	0	1
3	1	3	0	1
Average	1	3	0	1

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

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