

ICR Summary Information

**Subpart M**

Hours per Response	3
Number of Respondents	5
Total Estimated Burden Hours	14
Total Estimated Costs	\$1,730
Annualized Capital O&M	\$0
Total Annual Responses	5

**Overall**

Hours per Response	87
Number of Respondents	14
Total Estimated Burden Hours	2,010
Total Estimated Costs	\$349,000
Annualized Capital O&M	\$107,000
Total Annual Responses	23

**Subparts P, Q, R**

Hours per Response	111
Number of Respondents	7
Total Estimated Burden Hours	1,550
Total Estimated Costs	\$277,000
Annualized Capital O&M	\$90,300
Total Annual Responses	14

**Subpart S**

Hours per Response	0
Number of Respondents	0
Total Estimated Burden Hours	0
Total Estimated Costs	\$0
Annualized Capital O&M	\$0
Total Annual Responses	0

**Subpart Z**

Hours per Response	111
Number of Respondents	2
Total Estimated Burden Hours	444
Total Estimated Costs	\$70,100
Annualized Capital O&M	\$16,800
Total Annual Responses	4

**Table 1a: Annual Respondent Burden and Cost - NSPS for Secondary Brass and Bronze Production (40 CFR Part 60, Subpart M) (Renewal)**

					\$123.94	\$157.61	\$62.52
REPORTING/RECORDKEEPING REQUIREMENT	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year <sup>a</sup>	(E) Technical Hours per Year (E=C x D)	(F) Management Hours per Year (F= E x 0.05)	(G) Clerical Hours per Year (G= E x 0.1)
1. APPLICATIONS	N/A						
2. SURVEY AND STUDIES	N/A						
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS	N/A						
4. REPORTING REQUIREMENTS							
A. Familiarize with rule requirements	1	1	1	5	5	0.25	1
B. Required Activities							
Initial performance test <sup>c</sup>	24	1	24	0	0	0	0
Repeat of Performance Test <sup>d</sup>	24	0.2	4.8	0	0	0	0
Reference Method 5 or 9 <sup>e</sup>	4	1.2	4.8	0	0	0	0
Monitoring of emissions and systems performance <sup>f</sup>	0.5	365	182.5	0	0	0	0
C. Create Information	See 4B and 5E						
D. Gather Existing Information	See 4B and 5E						
E. Write Report							
Notification of actual startup <sup>c</sup>	2	1	2	0	0	0	0
Notification of initial performance test <sup>c</sup>	2	1	2	0	0	0	0
Notification of CMS <sup>e,f</sup>	2	1	2	0	0	0	0
Notification of anticipated date for conducting the opacity of observations <sup>e,f</sup>	2	1	2	0	0	0	0
Notification of modification/reconstruction	2	1	2	0	0	0	0
Semiannual reports of excess emissions and monitoring systems performance <sup>g</sup>	4	2	8	0	0	0	0
<b>Subtotal for Reporting Requirements</b>						<b>5.8</b>	
5. RECORDKEEPING REQUIREMENTS							
A. Read and understand rule requirements	See 4A						
B. Plan Activities	See 4B						
C. Implement Activities	See 4B						
D. Develop Record System	N/A						
E. Time to Enter and Transmit Information <sup>h</sup>							
Records of startups, shutdowns, malfunctions, etc.	1.5	1	1.5	5	7.5	0.38	0.75
Records of emissions and systems performance	See 4B						
F. Time to Train Personnel	N/A						
G. Time for Audits	N/A						

<b>Subtotal for Recordkeeping Requirements</b>						<b>8.6</b>
<b>TOTAL LABOR BURDEN AND COSTS <sup>j</sup></b>						<b>14</b>
<b>TOTAL CAPITAL AND O&amp;M COSTS (rounded) <sup>j</sup></b>						
<b>GRAND TOTAL(rounded) <sup>j</sup></b>						

Assumptions:

<sup>a</sup> We have assumed that are approximately 5 out of 11 secondary brass and bronze ingots production plants subject to NSPS Subpart M. We have further assumed that no new sources will to the rule over the three year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: Managerial \$157.61 (\$75.05 + 110%); Technical \$123.94 (\$59.02 + 110%); and 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.” These 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 costs associated with hiring, training, and equipping their employees.

<sup>c</sup> Initial rule requirements would apply only to new sources. We have assumed that no new sources will become subject to the rule over the three year period of this ICR.

<sup>d</sup> We have assumed that 20 percent of initial performance tests must be repeated due to failure.

<sup>e</sup> Sources are required to use the following Reference Methods (RM) in conducting performance tests, if applicable: 1) RM 5 for particulate matter concentrations and volumetric flow rate gas (all subparts); 2) RM 9 for visible emissions observations of opacity.

<sup>f</sup> Section 60.11 of the General Provisions allows sources to use a continuous opacity monitor (COM) in lieu of Method 9 to determine compliance with the opacity standard. However, we assume that all sources will use RM 9.

<sup>g</sup> Only existing sources using a continuous monitoring system (i.e., a COM or a continuous parameter monitoring system) are required to submit semiannual reports. Therefore, sources subject to subpart M are not required to submit semiannual reports.

<sup>h</sup> Sources are required to maintain records of startups, shutdowns and malfunctions including periods where the continuous monitoring system is inoperative, and of emission test results, continuous monitoring system data including, performance test results and other data needed to determine compliance with mass and visible emission limits.

<sup>i</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

(H) Cost, \$ <sup>b</sup>
\$690.36
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$0
\$690
\$1,035.54

3 hr/response

<b>\$1,036</b>
<b>\$1,730</b>
<b>\$0</b>
<b>\$1,730</b>

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**Table 1b: Annual Respondent Burden and Cost - Primary Copper Smelters (40 CFR Part 60, Subpart P), Primary Zinc Smelters (40 CFR Part 60, Subpart Q), and Primary Lead Smelters (40 CFR Part 60, Subpart R) (Renewal)**

					\$123.94	\$157.61	\$62.52	
REPORTING/RECORDKEEPING REQUIREMENT	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year <sup>a</sup>	(E) Technical Hours per Year (E=C x D)	(F) Management Hours per Year (F= E x 0.05)	(G) Clerical Hours per Year (G= E x 0.1)	(H) Cost, \$ <sup>b</sup>
1. APPLICATIONS	N/A							
2. SURVEY AND STUDIES	N/A							
3. ACQUISITION, INSTALLATION AND UTILIZATION OF TECHNOLOGY AND SYSTEMS	N/A							
4. RECORDING REQUIREMENTS								
A. Familiarize with rule requirements	1	1	1	7	7.0	0.35	0.70	\$966.51
B. Required Activities								
Initial performance test <sup>c</sup>	24	1	24	0	0	0	0	\$0
Repeat of performance test <sup>d</sup>	24	0.2	4.8	0	0	0	0	\$0
Reference Method 5 or 9 <sup>e</sup>	4	1.2	4.8	0	0	0	0	\$0
Monitoring of emissions and operations <sup>f</sup>	0.5	365	182.5	7	1277.5	63.88	127.75	\$176,387.62
C. Create Information	See 4B and 5E							
D. Gather Existing Information	See 4B and 5E							
E. Write Report								
Notification of actual startup <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of initial performance test <sup>c</sup>	2	1	2	0	0	0	0	\$0
Performance test results <sup>c,f</sup>	2	1	2	0	0	0	0	\$0
Notification of CMS <sup>c,e,f</sup>	2	1	2	0	0	0	0	\$0
Notification of anticipated date for conduction the opacity of observations <sup>c,e,f</sup>	2	1	2	0	0	0	0	\$0
Notification of modification/reconstruction	2	1	2	0	0	0	0	\$0
Semiannual reports of excess emissions and monitoring systems performance <sup>g</sup>	4	2	8	7	56	2.8	5.6	\$7,732.06
Process Change	2	2	4	0	0	0	0	\$0
<b>Subtotal for Reporting Requirements</b>						<b>1,542</b>		<b>\$185,086</b>
5. RECORDKEEPING REQUIREMENTS								
A. Read and understand rule requirements	See 4A							
B. Plan Activities	See 4B							
C. Implement Activities	See 4B							

D. Develop Record System	N/A							
E. Time to Enter and Transmit Information: <sup>h</sup>								
Records of startups, shutdowns, malfunctions, etc.	1.5	1	1.5	7	10.5	0.53	1.05	\$1,449.76
Records of monitoring of emissions and operations	See 4B							
F. Train Personnel	N/A							
G. Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>12</b>		<b>\$1,450</b>
<b>TOTAL LABOR BURDEN AND COSTS <sup>j</sup></b>						<b>1,550</b>		<b>\$187,000</b>
<b>TOTAL CAPITAL AND O&amp;M COSTS (rounded) <sup>j</sup></b>								<b>\$90,300</b>
<b>GRAND TOTAL(rounded) <sup>j</sup></b>								<b>\$277,000</b>

Assumptions:

<sup>a</sup> It is estimated that six primary pyrometallic copper smelters (Subpart P), one primary pyrometallurgical zinc smelter (Subpart Q), and zero primary pyrometallurgical lead smelter (Subpart R) are currently subject to the NSPS standards, which totals 7 respondents. The affected units at the primary lead smelter are shutdown, and only 7 respondents will have burden associated with this rule. We have further assumed that no additional sources will become subject to the standard in the next three years.

<sup>b</sup> This ICR uses the following labor rates: Managerial \$157.61 (\$75.05 + 110%); Technical \$123.94 (\$59.02 + 110%); and 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.

<sup>c</sup> Initial rule requirements would apply only to new sources. We have assumed that no new sources will become subject to the rule over the three year period of this ICR.

<sup>d</sup> We have assumed that 20 percent of initial performance tests must be repeated due to failure.

<sup>e</sup> Sources are required to use the following Reference Methods (RM) in conducting performance tests, if applicable: 1) RM 5 for particulate matter concentrations and volumetric flow rate of the effluent gas (all subparts); 2) RM 9 for visible emissions observations of opacity. Sources are expected to conduct the visible emissions observation of opacity during the initial performance test.

<sup>f</sup> Section 60.11 of the General Provisions allows sources to use a continuous opacity monitor (COM) in lieu of Method 9 to determine compliance with the opacity standard. We have assumed that all sources are using COMs. In addition, we assume the sources are using continuous monitoring systems (CMS) to monitor other parameters.

<sup>g</sup> Only existing sources using a continuous monitoring system (i.e., a COM or a continuous parameter monitoring system) are required to submit semiannual reports. Therefore, sources subject to NSPS subparts P, Q, and R are required to submit semiannual reports.

<sup>h</sup> Sources are required to maintain records of monitoring of operations including startups, shutdowns and malfunctions including periods where the continuous monitoring system is inoperative, emission test results, continuous monitoring system data including, performance test results and other data needed to determine compliance with mass and visible emission limits.

<sup>i</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

111 hr/response



**Table 1c: Annual Respondent Burden and Cost for NSPS - Primary Aluminum Reduction Plants (40 CFR Part 60, Subpart S) (Renewal)**

					\$123.94	\$157.61	\$62.52	
REPORTING/RECORDKEEPING REQUIREMENT	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year <sup>a</sup>	(E) Technical Hours per Year (E=C x D)	(F) Management Hours per Year (F= E x 0.05)	(G) Clerical Hours per Year (G= E x 0.1)	(H) Cost, \$ <sup>b</sup>
1. APPLICATIONS	N/A							
2. SURVEY AND STUDIES	N/A							
3. ACQUISITION, INSTALLATION AND UTILIZATION OF TECHNOLOGY AND SYSTEMS	N/A							
4. RECORDING REQUIREMENTS								
A. Familiarize with rule requirements	1	1	1	0	0	0	0	\$0
B. Required Activities								
Initial performance test <sup>c</sup>	24	1	24	0	0	0	0	\$0
Monthly performance test <sup>d</sup>	24	12	288	0	0	0	0	\$0
Annual performance test <sup>d</sup>	24	1	24	0	0	0	0	\$0
Repeat of performance test <sup>c,d</sup>	24	1.3	31.2	0	0	0	0	\$0
Reference Method 5 or 9 <sup>e</sup>	4	1.2	4.8	0	0	0	0	\$0
Monitoring of emissions and operations <sup>f</sup>	0.5	365	182.5	0	0	0	0	\$0
C. Create Information	See 4B and 5E							
D. Gather Existing Information	See 4B and 5E							
E. Write Report								
Notification of actual startup <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of annual performance tests <sup>d,f</sup>	2	1	2	0	0	0	0	\$0
Notification of monthly performance tests <sup>d,f</sup>	2	12	24	0	0	0	0	\$0
Annual performance test results <sup>f</sup>	2	1	2	0	0	0	0	\$0
Monthly performance test results <sup>f</sup>	2	12	24	0	0	0	0	\$0
Notification of CMS <sup>e,f</sup>	2	1	2	0	0	0	0	\$0
Notification of anticipated date for conduction the opacity of observations <sup>e,f</sup>	2	1	2	0	0	0	0	\$0
Notification of modification/reconstruction	2	1	2	0	0	0	0	\$0
Semiannual reports of excess emissions and monitoring systems performance <sup>g</sup>	4	2	8	0	0	0	0	\$0
Process Change	2	2	4	0	0	0	0	\$0

<b>Subtotal for Reporting Requirements</b>						<b>0</b>		<b>\$0</b>
5. RECORDKEEPING REQUIREMENTS								
A. Read and understand rule requirements	See 4A							
B. Plan Activities	See 4B							
C. Implement Activities	See 4B							
D. Develop Record System	N/A							
E. Time to Enter and Transmit Information: <sup>h</sup>								
Records of startups, shutdowns, malfunctions, etc.	1.5	1	1.5	0	0	0	0	\$0
Records of monitoring of emissions and operations	See 4B							
F. Train Personnel	N/A							
G. Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>0</b>		<b>\$0</b>
<b>TOTAL LABOR BURDEN AND COSTS <sup>j</sup></b>						<b>0</b>		<b>\$0</b>
<b>TOTAL CAPITAL AND O&amp;M COSTS (rounded) <sup>j</sup></b>								<b>\$0</b>
<b>GRAND TOTAL(rounded) <sup>j</sup></b>								<b>\$0</b>

Assumptions:

<sup>a</sup> It is estimated that there are currently 7 primary aluminum facilities, of which 6 are operating. Within those facilities there are a total of 22 potlines, of which 15 are operating. Similarly, there are 7 anode plants, of which 6 are operating; and 12 bake furnaces, of which 9 are operating. Based on information collected by the agency, we assume all potroom and anode facilities are and will comply with the Subpart LL MACT rather than the NSPS. We have further assumed that no additional sources per year will become subject to the NSPS standard in the next three years.

<sup>u</sup> This ICR uses the following labor rates: Managerial \$157.61 (\$/5.05 + 110%); Technical \$123.94 (\$59.02 + 110%); and 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.

<sup>c</sup> Initial rule requirements would apply only to new sources. We have assumed that no new sources will become subject to the rule over the three year period of this ICR.

<sup>d</sup> The rule requires sources to conduct a monthly performance test after the initial test and requires them to provide a 15 days advance notice of each test, except for the two sources specified in the rule that were allowed to conduct an annual performance test. We have further assumed that only 10 percent of the performance tests will have to be repeated.

<sup>e</sup> Sources are required to use the following Reference Methods (RM) in conducting performance tests, if applicable: 1) RM 5 for particulate matter concentrations and volumetric flow rate of the effluent gas; and 2) RM 9 for visible emissions observations of opacity.

<sup>f</sup> Section 60.11 of the General Provisions allows sources to use a continuous opacity monitor (COM) in lieu of Method 9 to determine compliance with the opacity standard. We have assumed that all sources are complying with the standard using RM 9, however, the sources are using continuous monitoring systems (CMS) to monitor other parameters.

<sup>g</sup> Only existing sources using a continuous monitoring system (i.e., a COM or a continuous parameter monitoring system) are required to submit semiannual reports. Therefore, sources subject to NSPS subpart S are required to submit semiannual reports.

<sup>h</sup> Sources are required to maintain records of their operations including records of startups, shutdowns and malfunctions, periods where the continuous monitoring system is inoperative, emission test results, performance test results and other operational data needed to determine compliance with mass and visible emission standards.

<sup>i</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

0 hr/response



Records of startups, shutdowns, malfunctions, etc.	1.50	1	1.50	2	3	0.15	0.3	\$414.22
Records of monitoring of emissions and operations	See 4B							
F. Train Personnel	N/A							
G. Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>3</b>		<b>\$414</b>
<b>TOTAL LABOR BURDEN AND COSTS <sup>j</sup></b>						<b>444</b>		<b>\$53,300</b>
<b>TOTAL CAPITAL AND O&amp;M COSTS (rounded) <sup>j</sup></b>								<b>\$16,800</b>
<b>GRAND TOTAL(rounded) <sup>j</sup></b>								<b>\$70,100</b>

Assumptions:

<sup>a</sup> It is estimated that 2 out of 7 ferroalloy production facilities nationwide is subject to the NSPS Subpart Z standards. We have further assumed that no additional sources per year will become subject to the NSPS standard in the next three years.

<sup>b</sup> This ICR uses the following labor rates: Managerial \$157.61 (\$75.05 + 110%); Technical \$123.94 (\$59.02 + 110%); and 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.

<sup>c</sup> Initial rule requirements would apply only to new sources. We have assumed that no new sources will become subject to the rule over the three year period of this ICR.

<sup>d</sup> We have assumed that 20 percent of initial performance tests must be repeated due to failure.

<sup>e</sup> Sources are required to use the following Reference Methods (RM) in conducting performance tests, if applicable: 1) RM 5 for particulate matter concentrations and volumetric flow rate of the effluent gas; 2) RM 9 for visible emissions observations of opacity.

<sup>f</sup> Section 60.11 of the General Provisions allows sources to use a continuous opacity monitor (COM) in lieu of Method 9 to determine compliance with the opacity standard. We have assumed that all sources are using COMs. In addition, we assume the sources are using continuous monitoring systems (CMS) to monitor other parameters.

<sup>g</sup> We have assumed that neither source will have a product change over the 3 year period of the ICR.

<sup>h</sup> Only existing sources using a continuous monitoring system (i.e., a COM or a continuous parameter monitoring system) are required to submit semiannual reports. Therefore, sources subject to NSPS Subpart Z are required to submit semiannual reports.

<sup>i</sup> Sources are required to maintain records of operations including startups, shutdowns and malfunctions, periods where the continuous monitoring system is inoperative, emission test results, and continuous monitoring system data including performance test results and other data needed to determine compliance with mass and visible emission limits.

<sup>j</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

111 hr/response

**Table 2a: Average Annual Agency Burden - NSPS for Secondary Brass and Bronze Production (40 CFR Part 60, Subpart M) (Renewal)**

					\$52.37	\$70.56	\$28.34	
REPORTING/RECORDKEEPING REQUIREMENT	(A) EPA Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year <sup>a</sup>	(E) Technical Hours per Year (E=C x D)	(F) Management Hours per Year (F= E x 0.05)	(G) Clerical Hours per Year (G= E x 0.1)	(H) Cost, \$ <sup>b</sup>
Notification of actual startup <sup>c</sup>	2.00	1	2	0	0	0	0	\$0
Notification of initial performance test	2.00	1	2	0	0	0	0	\$0
Report of performance test results	2.00	1	2	0	0	0	0	\$0
Notification of CMS	2.00	1	2	0	0	0	0	\$0
Notification of anticipated date for conducting the opacity of observations	2.00	1	2	0	0	0	0	\$0
Notification of modification/reconstruction	2.00	1	2	0	0	0	0	\$0
Semiannual reports of excess emissions and monitoring systems performance <sup>d</sup>	4.00	2	8	0	0	0	0	\$0
SALARY BURDEN (per year)								\$0
ANNUAL TRAVEL EXPENSES <sup>e</sup>	(1 person x 0 plants/year x 1 d/plant x \$50 per diem) + (\$400 round trip/plant x 0 plant/yr) =							\$0
<b>TOTAL (rounded)<sup>f</sup></b>						<b>0</b>		<b>\$0</b>

Assumptions:

<sup>a</sup> We have assumed that there are approximately five secondary brass and bronze producers subject to the NSPS subpart M standard and that no new sources will become subject to the NSPS standard in the next three years.

<sup>b</sup> 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%); and Clerical \$28.34 (GS-6, Step 3, \$17.17 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. 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 government employees.

<sup>c</sup> Initial rule requirements would apply only to new sources. We have assumed that no new sources will become subject to the rule over the three year period of this ICR.

<sup>d</sup> Only existing sources using a continuous monitoring system (i.e., a COM or a continuous parameter monitoring system) are required to submit semiannual reports. Therefore, sources subject to NSPS Subpart M are not required to submit semiannual reports.

<sup>e</sup> The time required to attend a performance test per plant is estimated to be approximately 24 hours (1 day).

<sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Average Annual Agency Burden - NSPS for Primary Copper Smelters (40 CFR Part 60, Subpart P), Primary Zinc Smelters (40 CFR Part 60, Subpart Q), and Primary Lead Smelters (40 CFR Part 60, Subpart R) (Renewal)**

					\$52.37	\$70.56	\$28.34	
REPORTING/RECORDKEEPING REQUIREMENT	(A) EPA Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year <sup>a</sup>	(E) Technical Hours per Year (E=C x D)	(F) Management Hours per Year (F= E x 0.05)	(G) Clerical Hours per Year (G= E x 0.1)	(H) Cost, \$ <sup>b</sup>
Notification of actual startup <sup>c</sup>	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 results	2	1	2	0	0	0	0	\$0
Notification of CMS	2	1	2	0	0	0	0	\$0
Notification of anticipated date for conducting the opacity of observations	2	1	2	0	0	0	0	\$0
Notification of modification/reconstruction	2	1	2	0	0	0	0	\$0
Semiannual reports of excess emissions and monitoring systems performance <sup>d</sup>	4	2	8	7	56	2.8	5.6	\$3,288.99
SALARY BURDEN (per year)								\$3,288.99
ANNUAL TRAVEL EXPENSES <sup>e</sup>	(1 person x 0 plants/year x 1 d/plant x \$50 per diem) + (\$400 round trip/plant x 0 plant/yr) =							\$0
<b>TOTAL (rounded) <sup>f</sup></b>						<b>64</b>		<b>\$3,290</b>

Assumptions:

<sup>a</sup> It is estimated that six primary pyrometallic copper smelters (Subpart P), one primary pyrometallurgical zinc smelter (Subpart Q), and zero primary pyrometallurgical lead smelter (Subpart R) are currently subject to the NSPS standards, which totals 7 respondents. The affected units at the primary lead smelter are shutdown, and only 7 respondents will have burden associated with this rule. We have further assumed that no additional sources will become subject to the standard in the next three years.

<sup>b</sup> 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%); and Clerical \$28.34 (GS-6, Step 3, \$17.17 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. 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 government employees.

<sup>c</sup> Initial rule requirements would apply only to new sources. We have assumed that no new sources will become subject to the rule over the three year period of this ICR.

<sup>d</sup> Only existing sources using a continuous monitoring system (i.e., a COM or a continuous parameter monitoring system) are required to submit semiannual reports. Therefore, sources subject to NSPS subparts P, Q and R are required to submit semiannual reports.

<sup>e</sup> The time required to attend a performance test per plant is estimated to be approximately 24 hours (1 day).

<sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



**Table 2c. Average Annual Agency Burden for NSPS - Primary Aluminum Reduction Plants (40 CFR Part 60, Subpart S) (Renewal)**

					\$52.37	\$70.56	\$28.34
REPORTING/RECORDKEEPING REQUIREMENT	(A) EPA Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year <sup>a</sup>	(E) Technical Hours per Year (E=C x D)	(F) Management Hours per Year (F= E x 0.05)	(G) Clerical Hours per Year (G= E x 0.1)
Notification of actual startup <sup>c</sup>	2	1	2	0	0	0	0
Notification of annual or monthly performance tests <sup>d</sup>	2	1	2	0	0	0	0
	2	12	24	0	0	0	0
Report of annual or monthly performance test results <sup>d</sup>	2	1	2	0	0	0	0
	2	12	24	0	0	0	0
Notification of CMS	2	1	2	0	0	0	0
Notification of anticipated date for conducting the opacity of observations	2	1	2	0	0	0	0
Notification of modification/reconstruction	2	1	2	0	0	0	0
Semiannual reports of excess emissions and monitoring systems performance <sup>e</sup>	4	2	8	0	0	0	0
SALARY BURDEN (per year)							
ANNUAL TRAVEL EXPENSES <sup>e</sup>	(1 person x 0 plants/year x 3 d/plant x \$50 per diem) + (\$400 round trip/plant x 0 plant/yr) =						
<b>TOTAL (rounded) <sup>f</sup></b>						<b>0</b>	

Assumptions:

<sup>a</sup> It is estimated that there are currently 7 primary aluminum facilities, of which 6 are operating. Within those facilities there are a total of 22 potlines, of which 15 are operating. there are 7 anode plants, of which 6 are operating; and 12 bake furnaces, of which 9 are operating. Based on information collected by the agency, we assume all potroom and anode plants are and will comply with the Subpart LL MACT rather than the NSPS. We have further assumed that no additional sources per year will become subject to the NSPS standard in the next three years.

<sup>b</sup> 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%); and Clerical \$28.34 (GS-6, Step 3, \$17.17 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. 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 package available to government employees.

<sup>c</sup> Initial rule requirements would apply only to new sources. We have assumed that no new sources will become subject to the rule over the three year period of this ICR.

<sup>d</sup> Only existing sources using a continuous monitoring system (i.e., a COM or a continuous parameter monitoring system) are required to submit semiannual reports. Therefore, sources not subject to NSPS subpart S are required to submit semiannual reports.

<sup>e</sup> The time required to attend a performance test per plant is estimated to be approximately 24 hours (1 day).

<sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.





**Table 2d: Average Annual Agency Burden - NSPS for Ferroalloy Production Facilities (40 CFR Part 60, Subpart Z) (Renewal)**

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
REPORTING/RECORDKEEPING REQUIREMENT	EPA Hours per Occurrence (Technical hours)	Number of Occurrences per Plant per Year	EPA Hours per Year (C=A x B)	Plants per Year <sup>a</sup>	Technical Hours per Year (E=C x D)	Management Hours per Year (F= E x 0.05)	Clerical Hours per Year (G= E x 0.1)	Cost, \$ <sup>b</sup>
					\$52.37	\$70.56	\$28.34	
Notification of actual startup <sup>c</sup>	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 results	2	1	2	0	0	0	0	\$0
Notification of CMS	2	1	2	0	0	0	0	\$0
Notification of anticipated date for conducting the opacity of observations	2	1	2	0	0	0	0	\$0
Notification of modification/reconstruction	2	1	2	0	0	0	0	\$0
Notification of product change	4	1	4	0	0	0	0	\$0
Semiannual reports of excess emissions and monitoring systems performance <sup>e</sup>	4	2	8	2	16	0.8	1.6	\$939.71
SALARY BURDEN (per year)								<b>\$939.71</b>
ANNUAL TRAVEL EXPENSES <sup>e</sup>	(1 person x 0 plants/year x 1 d/plant x \$50 per diem) + (\$400 round trip/plant x 0 plant/yr) =							\$0
<b>TOTAL (rounded) <sup>f</sup></b>						<b>18</b>		<b>\$940</b>

Assumptions:

<sup>a</sup> We have assumed that there are 2 ferroalloy production facilities subject to NSPS subpart Z and that no new sources will become subject to the NSPS standard in the next three years.

<sup>b</sup> 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%); and Clerical \$28.34 (GS-6, Step 3, \$17.17 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. 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 government employees.

<sup>c</sup> Initial rule requirements would apply only to new sources. We have assumed that no new sources will become subject to the rule over the three year period of this ICR.

<sup>d</sup> Only existing sources using a continuous monitoring system (i.e., a COM or a continuous parameter monitoring system) are required to submit semiannual reports. Therefore, sources subject to NSPS subpart Z are required to submit semiannual reports.

<sup>e</sup> The time required to attend a performance test per plant is estimated to be approximately 24 hours (1 day).

<sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

<b>Capital/Startup vs. Operation and Maintenance</b>			
<b>(A)</b>	<b>(B)</b>	<b>(C)</b>	<b>(D)</b>
<b>Continuous Monitoring Device</b>	<b>Capital/Startup Cost for One Respondent</b>	<b>Number of New Respondents</b>	<b>Total Capital/Startup Cost, (B X C)</b>
<b>Subpart M</b>			
None			
<b>Subparts P, Q, R <sup>a</sup></b>			
Opacity monitor	\$36,000	0	\$0
CMS that measures SO2 emissions	\$25,100	0	\$0
<b>Subpart S <sup>b</sup></b>			
CMS that weighs Al and anode produced daily	Unknown	0	\$0
<b>Subpart Z</b>			
Opacity monitor	\$36,000	0	\$0
CMS that measures furnace power input and flow rate or fan motor power consumption and pressure drop across fan	Gas flow - \$13,500 Pressure drop - \$1,300	0	\$0
<b>Totals (rounded) <sup>c</sup></b>			<b>\$0</b>

<sup>a</sup> It is estimated that six primary pyrometallic copper smelters (Subpart P), one primary pyrometallurgical zinc (Subpart R) are currently subject to the NSPS standards, which totals 7 respondents.

<sup>b</sup> It is estimated that there are currently 7 primary aluminum facilities, of which 6 are operating. Within those facilities, there are 7 anode plants, of which 6 are operating; and 12 bake furnaces, of which 9 are operating. Similarly, there are 7 anode plants, of which 6 are operating; and 12 bake furnaces, of which 9 are operating. than the NSPS. We have further assumed that no additional sources per year will become subject to the NSPS

<sup>c</sup> Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

<b>(O&amp;M) Costs</b>		
<b>(E)</b>	<b>(F)</b>	<b>(G)</b>
<b>Annual O&amp;M Costs for One Respondent</b>	<b>Number of Respondents with O&amp;M</b>	<b>Total O&amp;M, (E X F)</b>
\$7,500	7	\$52,500
\$5,400	7	\$37,800
\$5,000	0	\$0
\$7,500	2	\$15,000
\$900	2	\$1,800
		<b>\$107,000</b>

\$107,000

ic smelter (Subpart Q), and zero primary pyrometallurgical lead smelter

facilities there are a total of 22 potlines, of which 15 are operating. We assume all facilities will comply with the Subpart LL MACT rather than the Subpart LL standard in the next three years.



<b>Total Annual Responses</b>				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents <sup>a</sup>	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
<b>NSPS Subpart M</b>				
N/A	0	0	5	5
<b>NSPS Subpart P, Q and R</b>				
Semiannual report	7	2	0	14
<b>NSPS Subpart S <sup>b</sup></b>				
Notification of annual performance test	2	0	0	0
Notification of monthly performance test	2	0	0	0
Report of annual performance test	2	0	0	0
Report of monthly performance test	2	0	0	0
Semiannual report	4	0	0	0
<b>NSPS Subpart Z</b>				
Semiannual report	2	2	0	4
			<b>Total (All Subparts)</b>	<b>23</b>

<sup>a</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

<sup>b</sup> It is estimated that there are currently 7 primary aluminum facilities, of which 6 are operating. Within those facilities there are a total of 22 potlines, of which 15 are operating. Similarly, there are 7 anode plants, of which 6 are operating; and 12 bake furnaces, of which 9 are operating. We assume all facilities will comply with the Subpart LL MACT rather than the NSPS. We have further assumed that no additional sources per year will become subject to the NSPS standard in the next three years.

<b>Number of Respondents</b>				
	<b>Respondents That Submit Reports</b>		<b>Respondents That Do Not Submit Any Reports</b>	
	<b>(A)</b>	<b>(B)</b>	<b>(C)</b>	<b>(D)</b>
<b>Year</b>	<b>Number of New Respondents <sup>a</sup></b>	<b>Number of Existing Respondents</b>	<b>Number of Existing Respondents that keep records but do not submit reports</b>	<b>Number of Existing Respondents That Are Also New Respondents</b>
<b>NSPS Subpart M</b>				
1	0	0	5	0
2	0	0	5	0
3	0	0	5	0
<b>Average</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>0</b>
<b>NSPS Subpart P, Q and R</b>				
1	0	7	0	0
2	0	7	0	0
3	0	7	0	0
<b>Average</b>	<b>0</b>	<b>7</b>	<b>0</b>	<b>0</b>
<b>NSPS Subpart S</b>				
1	0	0	0	0
2	0	0	0	0
3	0	0	0	0
<b>Average</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>NSPS Subpart Z</b>				
1	0	2	0	0

2	0	2	0	0
3	0	2	0	0
<b>Average</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>

<sup>a</sup> New respondents include sources with constructed, reconstructed, and modified affected facilities.

<b>(E)</b>
<b>Number of Respondents (E=A+B+C-D)</b>
5
5
5
5
7
7
7
7
0
0
0
0
2

2
2
2