

### ICR Summary Information

Hours per Response	255
Number of Respondents	11
Total Estimated Burden Hours	19,900
Total Estimated Costs	\$2,750,000
Annualized Capital O&M	\$238,000
Form Number	Not Applicable

**Table 1: Annual Respondent Burden and Cost – NESHAP for the Secondary Lead Smelter Industry**

<b>Burden item</b>	<b>(A) Person-hours per occurrence</b>	<b>(B) Annual occurrences per respondent</b>	<b>(C) Person-hours per respondent per year (A x B)</b>
1. Applications	N/A		
2. Surveys and studies	N/A		
3. Reporting requirements			
A. Familiarization with the regulatory requirements <sup>a</sup>	1	1	1
B. Required activities <sup>c</sup>			
Annual performance test	330	1	330
THC testing	10	1	10
Dioxin/furan testing	10	1	10
Lead testing	10	0.5	5
Continuous particulate monitor	1	52	52
Differential pressure monitor	2	1	2
Inspect capture hoods	8	12	96
Inspect and repair enclosures	20	12	240
Inspect battery storage areas	8	52	416
Revise SOP manual <sup>d</sup>	20	1	20
C. Create information	See 3B		
D. Gather information	See 3E		
E. Report preparation			
Notification of performance test <sup>e</sup>	2	2	4
Semiannual compliance report	16	2	32
Annual (performance test) report <sup>e</sup>	10	2	20
Differential pressure monitoring report <sup>f</sup>	10	1	10
<b>Reporting Subtotal</b>			
1. Recordkeeping requirements			
A. Familiarization with the regulatory requirements	See 3A		
B. Implement activities	N/A		
C. Develop record system	N/A		
D. Record information			
Fugitives	1	12	12
Flow weighted averages for lead	1	1	1
Continuous particulate monitor	1	52	52
Differential pressure monitors	1	12	12
Power outages	1	12	12
Facility enclosure inspections	1	12	12
Startup and shutdown periods	1	12	12
Malfunctions	2	6	12
Actions taken during malfunctions	1	6	6
Bag Leak Detection System	1	12	12
Furnace inspections	1	12	12
Plastic battery casing material recovery	1	6	6

Monitoring parameters, performance tests, and periodic inspections	3.5	52	182
E. Personnel training	8	1	8
F. Time for audits	N/A		
<b>Recordkeeping Subtotal</b>			
<b>Total Labor Burden and Costs (rounded) <sup>g</sup></b>			
<b>Total Capital and O&amp;M Cost (rounded) <sup>g</sup></b>			
<b>GRAND TOTAL (rounded) <sup>g</sup></b>			

**Assumptions:**

<sup>a</sup> EPA estimates an average of 11 existing facilities and no new or modified facilities per year will be subject to the NESHAP codified since 2013. We assume that each source subject to the standard will have to familiarize with the regulatory requirements at startup, intention to construct/reconstruct, notification of applicability and notification of initial compliance will not occur during

<sup>b</sup> This ICR uses the following labor rates: \$163.17 (\$77.70 + 110%) per hour for Executive, Administrative, and Managerial and Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, “Table of compensation.” The rates have been increased by 110 percent to account for varying industry wage rates and the additional overhead expenses associated with hiring, training, and equipping their employees.

<sup>c</sup> Testing frequency was assumed as follows, based on rule requirements and experience with the affected source actual testing. The ICR assumes 2 of the 11 sources conduct dioxin/furan tests each year. Lead testing is required annually but many sources require to conduct lead tests each year. The ICR estimates that all sources have continuous particulate monitors and that two differential pressure emission observation requirement in the rule is not accounted for in the burden estimate. In addition, each facility must conduct tests in areas that are not in enclosures.

<sup>d</sup> EPA assumes one facility will make one major adjustment per year. In each instance, the SOP must be revised.

<sup>e</sup> Performance test data and performance evaluation data must be developed using EPA’s Electronic Reporting Tool (ERT) and assumes one notification and one test report for each test conducted will be submitted. There are 20 tests for the 12 sources, 20/

<sup>f</sup> EPA assumes that one report will be submitted for all differential pressure monitors at the facility.

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

γ (40 CFR Part 63, Subpart X) (Renewal)

(D) Respondents per year <sup>a</sup>	(E) Technical hours per year (C x D)	(F) Management hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.10)	(H) Annual cost (\$) <sup>b</sup>
11	11	0.55	1.1	\$1,595.10
11	3,630	181.5	363	\$526,384.49
11	110	5.5	11	\$15,951.05
2	20	1	2	\$2,900.19
6	30	1.5	3	\$4,350.29
11	572	28.6	57.2	\$82,945.43
22	44	2.2	4.4	\$6,380.42
11	1,056	52.8	105.6	\$153,130.03
11	2,640	132	264	\$382,825.08
11	4,576	228.8	457.6	\$663,563.47
1	20	1	2	\$2,900.19
11	44	2.2	4.4	\$6,380.42
11	352	17.6	35.2	\$51,043.34
11	220	11	22	\$31,902.09
11	110	5.5	11	\$15,951.05
	<b>15,450</b>			<b>\$1,948,203</b>
11	132	6.6	13.2	\$19,141.25
11	11	0.55	1.1	\$1,595.10
11	572	28.6	57.2	\$82,945.43
22	264	13.2	26.4	\$38,282.51
11	132	6.6	13.2	\$19,141.25
11	132	6.6	13.2	\$19,141.25
11	132	6.6	13.2	\$19,141.25
11	132	6.6	13.2	\$19,141.25
11	66	3.3	6.6	\$9,570.63
11	132	6.6	13.2	\$19,141.25
11	132	6.6	13.2	\$19,141.25
11	66	3.3	6.6	\$9,570.63

Labor Rate
Management
Technical
Clerical



ates
\$163.17
\$130.28
\$65.71

hr/response

**Table 2: Average Annual EPA Burden and Cost – NESHAP for the Secondary Lead Sm**

<b>Burden item</b>	<b>(A) EPA person-hours per occurrence</b>	<b>(B) Annual occurrences per respondent</b>	<b>(C) EPA person- hours per respondent per year (A x B)</b>
1. Applications	N/A		
2. Required activities			
A. Observe stack tests <sup>c</sup>	48	1	48
B. Excess emissions - enforcement activities <sup>d</sup>	24	1	24
C. Create information	N/A		
D. Gather information	N/A		
E. Report reviews			
Notification of performance test	3	2	6
Semiannual report	10	2	20
Annual report	10	2	20
Differential pressure monitoring	3	1	3
F. Prepare annual summary report <sup>e</sup>	4	11	44
<b>TOTAL (rounded) <sup>f</sup></b>			

**Assumptions:**

<sup>a</sup> EPA estimates an average of 11 existing facilities and no new facilities per year will be subject to the NESHA

<sup>b</sup> The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to account for 60%), Technical rate of \$54.51 (GS-12, Step 1, \$34.07 + 60%), and Clerical rate of \$29.50 (GS-6, Step 3, \$18.4 Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the b

<sup>c</sup> EPA assumes Agency personnel will attend 20% of facility stack tests (0.2 x 20 tests on average across the 11

<sup>d</sup> EPA assumes 10% of facilities will have excess emissions (0.1 x 11 = 1, after rounding).

<sup>e</sup> EPA assumes state and EPA personnel will require 4 technical hours per respondent when preparing the annual

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

**Relter Industry (40 CFR Part 63, Subpart X) (Renewal)**

(D) Respondents per year <sup>a</sup>	(E) Technical hours per year (C x D)	(F) Management hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.10)	(H) Annual cost (\$) <sup> b</sup>
4	192	9.6	19.2	\$11,276.54
1	96	4.8	9.6	\$5,638.27
11	66	3.3	6.6	\$3,876.31
11	220	11	22	\$12,921.04
11	220	11	22	\$12,921.04
11	33	1.65	3.3	\$1,938.16
1	44	2.2	4.4	\$2,584.21
		<b>1,000</b>		<b>\$51,200</b>

Labor R
Management
Technical
Clerical

P over the next 3 years.

for government overhead expenses. Managerial rates of \$73.46 (GS-13, Step 5, \$45.91 + 4 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 General benefit packages available to government employees. facilities = 4, after rounding).

il summary report (11 x 4 = 44).



ates
\$70.56
\$52.37
\$28.34

<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>
THC testing	\$0	0	\$0
Dioxin/furan testing <sup>a</sup>	\$0	0	\$0
Lead testing <sup>b</sup>	\$0	0	\$0
Continuous particulate monitor <sup>c</sup>	\$0	0	\$0
Differential pressure monitor <sup>d</sup>	\$2,300	0	\$0
HEPA filter monitor	\$32,759	0	\$0
<b>Total <sup>e</sup></b>			<b>\$0</b>

<sup>a</sup> Dioxin/Furan testing occurs every 6 years, or 11 facilities/6 years = 2 facilities per year after rounding.

<sup>b</sup> Lead testing is required annually, but there are provisions by which facilities can apply for an extension. The 24 months. 11 facilities/2 years = approximately 6 facilities per year conducting lead testing.

<sup>c</sup> EPA has assumed that all facilities will have CPMs.

<sup>d</sup> EPA has assumed that each facility will have two differential pressure monitors.

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

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**(O&M) Costs**

<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>
\$4,700	11	\$51,700
\$19,300	2	\$38,600
\$10,000	6	\$60,000
\$7,500	11	\$82,500
\$230	22	\$5,060
\$4,665	0	\$0
		<b>\$238,000</b>

\$238,000

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is ICR assumes all facilities will apply for an extension to test once every

<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
Notification of Performance Test	11	2	0	22
Semiannual compliance report	11	2	0	22
Annual (performance test) report	11	2	0	22
Differential pressure monitoring report	11	1	0	11
Revised Standard Operating Procedures Manual	1	1	0	1
			<b>Total</b>	<b>78</b>

<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>
1	0	11	0	0
2	0	11	0	0
3	0	11	0	0
Average	0	11	0	0

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

<b>(E)</b>
<b>Number of Respondents (E=A+B+C-D)</b>
11
11
11
11