ICR Summary Information

Hours Per Response	1045
Number of Respondents	1
Total Estimated Burden Hours	6,270
Total Estimated Costs	$1,030,000
Annualized Capital O&M	$235,000
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Lead Smelting (40 CFR P

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]	(E) Technical person- hours per year (E=CxD)
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. Familiarization with Regulatory Requirements	2	1	2	1	2
B. Required activities:					
i. Initial Performance tests: [c]	8	1	8	0	0
ii. Monitoring of operations and equipment: [d]					
- Implement baghouses SOP	13.4	365	4,891	1	4,891
- Quarterly compliance stack tests for lead compounds					
Main stack	8	4	32	1	32
Furnace area stack	8	4	32	1	32
Refining building stack	8	4	32	1	32
D. Gather Existing Information	See 4B and 5E				
E. Write report [c]					
i. Notification of compliance status [c]	2	1	2	0	0
ii. Notification of actual startup [c]	2	1	2	0	0
iii. Notification of construction/ reconstruction [c]	2	1	2	0	0
iv. Notification of Performance Test [c]	2	1	2	0	0
v. Notification of actual startup [c]	2	1	2	0	0
vi. Reports of performance test results	4	1	4	0	0
vii. Operation and maintenance reports	10	1	10	0	0
viii. Semi-annual reports [e]	16	2	32	1	32
ix. Notification of physical/operational changes [f]	2	1	2	0	0
x. Submit quarterly reports	16	4	64	1	64
Subtotal for Reporting Requirements					
5. Recordkeeping Requirements					
A. Familiarize with Regulatory 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:	1	365	365	1	365
- Records of operating parameters					
- Records of compliance inspections					
- Records of performance tests					
F. Time to train personnel	N/A				
G. Time for audits	N/A				
Subtotal for Recordkeeping Requirements					
Total Labor Burden and Costs (rounded) [g]					
Total Capital and O&M Cost (rounded) [g]					
GRAND TOTAL (rounded) [g]					

Assumptions:

[a] While no sources are currently subject to the standard, for the purposes of this ICR, we have assumed that there is an estir subject to NESHAP Subpart TTT since it is still in effect. We have assumed that there will be no new net growth for this in

[b] This ICR uses the following labor rates: Managerial $163.17 ($77.70+ 110%); Technical $130.28 ($62.04 + 110%); and (from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "Table 2. Civilian Workers, by oc from column 1, "Total compensation." The rates have been increased by 110 percent to account for varying industry wage r employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equip

[c] Since there are no new sources, the initial rule requirements do not apply (e.g. initial performance test using Method 12 fc compliance demonstration).

[d] Monitoring of operations includes: 1) implementation of Standard Operating Procedures (SOP) for operation and mainte bag leak detection system does not alarm more than five percent of the time in any 6-month period, which we have assumed implement the monitoring and recordkeeping requirements; 2) a quarterly compliance tests for lead compounds; 3) and the the operators are given three options to comply including: daily checks for in-draft at all doorway openings using an anemor the ventilation exhaust rate and damper positions at settings that result in an in-draft at each open doorway; or an alternative

[e] We have assumed that sources will continue to submit semiannual reports.

[f] We are assuming that sources will not be changing operating parameters even when sources may purchase new equipmen

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

'art 63, Subpart TTT) (Renewal)

(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year [b]
0.1	0.2	$290.02
0	0	$0
245	489	$709,241.46
1.6	3.2	$4,640.30
1.6	3.2	$4,640.30
1.6	3.2	$4,640.30
0	0	$0
0	0	$0
0	0	$0
0	0	$0
0	0	$0
0	0	$0
0	0	$0
1.6	3.2	$4,640.30
0	0	$0
3.2	6.4	$9,280.61
5,848		***$737,373***

2022 Labor Costs	
Managerial	$163.17
Technical	$130.28
Clerical	$65.71

18.3	36.5	$52,928.47
420		***$52,928***
6,270		**$790,000**
		$235,000
		$1,030,000

Responses	**Hrs/Response**
6	1045

nated average one existing respondent which is
dustry over the three-year period of this ICR.

Clerical $65.71 ($31.29 + 110%). These rates are
:cupational and industry group." The rates are
·ates and the additional overhead business costs of
)ping their employees.

)r lead emissions and initial sinter building in-draft

nance of baghouses on a daily basis such that its
takes about 13.4 labor hours per 24 hour day to
monitoring of sinter building in-draft for which
neter or equivalent device; establish and maintain
monitoring method.

t.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Lead Smelting (40 CF TTT) (Renewal)

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (AxB)	(D) Plants per year [a]	(E) Technical person-hours per year (CxD)	(F) Management person-hours per year (Ex0.05)
Initial notification [c]	2	1	2	0	0	0
Notification of performance test [c]	0.5	4	2	0	0	0
Notification of physical or Operational changes [c]	4	1	4	0	0	0
Semi-annual reports	10	2	20	1	20	1
Review quarterly test results	8	4	32	1	32	1.6
TOTAL (rounded)[d]:						**60**

Assumptions:

[a] While no sources are currently subject to the standard, for the purposes of this ICR, we have assumed that there is an av respondent currently operating in the United States since the NESHAP Subpart TTT rule is still in effect. It is estimated t respondents will become subject to the regulation in the next three years based on information available on the sector.

[b] This cost is based on the average hourly labor rate as follows: Managerial $73.46 (GS-13, Step 5, $45.91 + 60%); Tech Step 1, $34.07 + 60%); and Clerical $29.50 (GS-6, Step 3, $18.44 + 60%). This ICR assumes that Managerial hours are 5 hours, and Clerical hours are 10 percent of Technical hours. These rates are from the Office of Personnel Management (O Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit pac government employees.

[c] While no sources are currently subject to the standard, for the purposes of this ICR burden, we have not included an est initial rule requirements.

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

'R Part 63, Subpart

(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
0	$0
0	$0
0	$0
2	$1,222.66
3.2	$1,956.26
	$3,180

Labor Rates	
Managerial	$73.46
Technical	$54.51
Clerical	$29.50

verage of one existing
that no additional

nical $54.51 (GS-12,
percent of Technical
PM), 2023 General
ckages available to

imate for any of the

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

(A)	(B)	(C)	(D)	(E)
Continuous Monitoring Device	Capital/ Startup Cost for One Respondent [c]	Number of New Respondents	Total Capital/ Startup Cost, (B X C)	Annual O&M Costs for One Respondent [c]
Bag Leak detection system - continuous particulate matter sensor [a]	$14,629	0	$0	$9,056
Flow monitors with high/low alarms [a]	$9,056	0	$0	$9,056
Method 12 Performance Tests [b]	N/A		N/A	$217,340
TOTAL [d]			**$0**	

[a] Assumption: $500 per year per monitoring system per baghouse in 2011 $; we assume the respondent has 13 b

[b] Assumption: $13,000 per test per stack in 2011 $, 12 tests per year across 3 stacks.

[c] Costs have been adjusted from 2011 $ to 2022 $ using the CEPCI CE Index.

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

Costs

2011 CEPCI
585.7

(F)	(G)	
Number of Respondents with O&M	Total O&M, (E X F)	
1	$9,056	
1	$9,056	
1	$217,340	**Totals**
	$235,000	$235,000

aghouses.

2022 CEPCI

816

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Quarterly Reports	1	4	0	4
Semiannual Reports	1	2	0	2
			Total	**6**

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

[a] New respondents include sources with constructed, reconstructed and modified affected facilitie

(D)	(E)
Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
0	1
0	1
0	1
0	1

s.