# U.S. Environmental Protection Agency
# Information Collection Request

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

**OMB Control Number:** 2060-0433

**EPA ICR Number:** 1894.12

**Abstract:** The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) were 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.

The Office of Management and Budget (OMB) approved the currently active ICR without any "Terms of Clearance ."

**Supporting Statement A**

## 1. NEED AND AUTHORITY FOR THE COLLECTION

*Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate 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 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 cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart RRR.

**2. PRACTICAL UTILITY/USERS OF THE DATA**

*Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.*

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.

**3. USE OF TECHNOLOGY**

*Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.*

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 performance evaluation 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 certain notifications through EPA's CEDRI. The notification is an upload of their currently required notification in portable document format (PDF) file. For the purposes of this ICR, it is assumed that there is no additional burden associated with the requirement for respondents to submit the notifications and reports electronically. The supplemental files to this ICR renewal contain screenshots showing the CDX homepage for CEDRI login, the CEDRI PRA screen, the CEDRI interface for managing reports for various subparts, and the landing page of the ERT that shows the link to PRA information.

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.

**4. EFFORTS TO IDENTIFY DUPLICATION**

*Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.*

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 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 reporting or 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.

**5. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES**

*If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.*

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.

## 6. CONSEQUENCES OF LESS FREQUENT COLLECTION

*Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.*

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the 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.

## 7. GENERAL GUIDELINES

*Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB 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 the standards. 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. 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 the destruction or nonexistence of essential records.

## 8. PUBLIC COMMENT AND CONSULTATIONS

### 8a. Public Comment

*If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.*

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (89 FR 63933) on August 6, 2024. No comments were received on the burden published in the Federal Register for this renewal.

### 8b. Consultations

*Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.*

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 the standard, 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.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed 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 at 847-279.0001. The Aluminum Association responded with comments on the number of facilities, confirming that the estimate of 161 existing sources is accurate and development of 4 new facilities is expected in the next three years. We have incorporated this information into the burden estimate.

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

**9. PAYMENTS OR GIFTS TO RESPONDENTS**

*Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.*

No payments or gifts are made to respondents.

**10. ASSURANCE OF CONFIDENTIALITY**

*Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.*

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 (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).

**11. JUSTIFICATION FOR SENSITIVE QUESTIONS**

*Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.*

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

**12. RESPONDENT BURDEN HOURS & LABOR COSTS**

*Provide estimates of the hour burden of the collection of information. The statement should:*

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.*
- *If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*
- *Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.*

**12a. Respondents/NAICS Codes**

The respondents to the recordkeeping and reporting requirements are secondary aluminum production facilities. The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standards are listed in the table 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 |

Based on our research for this ICR, on average over the next three years, approximately 161 existing respondents will be subject to the standard. It is estimated that an additional 1.3 respondents per year

will become subject, for an overall average of 164 respondents per year. The number of respondents is calculated using the table Number of Respondents that addresses the three years covered by this ICR. None of the 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 is an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

The total number of annual responses per year is calculated using the table Total Annual Responses shown below. The number of Total Annual Responses is 441.

**12b. Information Requested**

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). 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.

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)(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) |
| 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) |

| **Recordkeeping** | |
|---|---|
| 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) |

**12c. 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. |

**12d. Respondent Burden Hours and Labor Costs**

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 average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 13,000 hours (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation,

Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

This ICR uses the following labor rates:

| | |
|---|---|
| Managerial | $172.41 ($82.10 + 110%) |
| Technical | $141.75 ($67.50 + 110%) |
| Clerical | $71.36 ($33.98 + 110%) |

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2023, "Table 2. Civilian workers by occupational and industry group." The rates are from column 1, "Total compensation." The rates are 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.

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.

**13. RESPONDENT CAPITAL AND O&M COSTS**

*Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).*

*The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.*
*If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.*

*Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.*

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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 this regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

The total capital/startup costs for this ICR are $2,780,000. This is the total of column D shown below in the table Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The total operation and maintenance (O&M) costs for this ICR are $1,870,000. This is the total of column G shown below in the table Capital/Startup vs. Operation and Maintenance (O&M) Costs.

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 $4,650,000.

**14. AGENCY COSTS**

*Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.*

**14a. Agency Activities**

The EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

- 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.

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 standard, 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. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

**14b. Agency Labor Cost**

The 'burden' to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors. 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 burden and cost during the three years of the ICR is estimated to be 2,200 hours at a cost of

$122,000. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal).

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

| | |
|---|---|
| Managerial | $76.91 (GS-13, Step 5, $48.07 + 60%) |
| Technical | $57.07 (GS-12, Step 1, $35.67 + 60%) |
| Clerical | $30.88 (GS-6, Step 3, $19.30+ 60%) |

These rates are from the Office of Personnel Management (OPM), 2024 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. 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 Production (40 CFR Part 63, Subpart RRR) (Renewal).

**14c. Agency Non-Labor Costs**

There are no non-labor costs to the Agency associated with this information collection.

**15) REASONS FOR CHANGE IN BURDEN**

*Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.*

The increase in burden from the most recently approved ICR is due to an adjustment. The adjustment is due to an increase in the number of new sources expected over the next three years based on feedback received from The Aluminum Association during consultation (section 8b of this document). Additionally, there is an increase in labor costs due to the use of updated labor rates. This ICR uses labor rates from the most recent Bureau of Labor Statistics report (December 2023) to calculate respondent burden costs, which also results in an increase in labor burden to industry. There is an increase in the capital/O&M costs due to the increased number of new sources described above.

**16) PUBLICATION OF DATA**

*For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.*

All non-CBI data submitted electronically to the Agency through CEDRI are available to the public for review and printing and are accessible using WebFIRE. Electronically submitted emissions data from performance testing or performance evaluations using the Electronic Reporting Tool or templates attached to CEDRI, as well as data from reports from regulations with electronic templates, are tabulated; data submitted as portable document format (PDF) files attached to CEDRI are neither tabulated nor subject to complex analytical techniques. Electronically submitted emissions data used to develop emissions factors undergo complex analytical techniques and the draft emissions factors are available on the Clearinghouse for Inventories and Emission Factors listserv at https://www.epa.gov/chief/chief-listserv for public review and printing. Electronically submitted

emissions data, as well as other data, obtained from one-time or sporadic information collection requests often undergo complex analytical techniques; results of those activities are included in individual rulemaking dockets and are available at https://www.regulations.gov/ for public review and printing.

**17) DISPLAY OF EXPIRATION DATE**

*If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.*

EPA will display the expiration date for OMB approval of the information collection.

**18) CERTIFICATION STATEMENT**

*Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."*

There are no exceptions to the topics of the certification statement.

**Table 1: Annual Respondent Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal)**

| 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) | (F) Management person-hours per year (F=Ex0.05) | (G) Clerical person-hours per year (G=Ex0.1) | (H) Cost ($) [b] |
|---|---|---|---|---|---|---|---|---|
| 1. Applications | N/A | | | | | | | |
| 2. Surveys and studies | N/A | | | | | | | |
| 3. Acquisition, installation, and utilization of technology and systems [c] | 54 | 1 | 54 | 1.3 | 72.0 | 3.6 | 7.2 | $11,340.47 |
| 4. Reporting requirements | | | | | | | | |
| a. Familiarization with Regulatory Requirements [d] | 1 | 1 | 1 | 164 | 163.7 | 8.2 | 16.4 | $25,778.04 |
| b. Required activities | | | | | | | | |
| Initial performance test [e, f] | 24 | 1 | 24 | 1.3 | 32.0 | 1.6 | 3.2 | $5,040.21 |
| Repeat performance test [e, f] | 24 | 0.2 | 4.8 | 1.3 | 6.4 | 0.3 | 0.6 | $1,008.04 |
| Operating, maintenance and monitoring plan [e, f] | 32 | 1 | 32 | 1.3 | 42.7 | 2.1 | 4.3 | $6,720.28 |
| Startup, shutdown, malfunction (SSM) plan | N/A | | | | | | | |
| c. Create information | See 4B | | | | | | | |
| d. Gather existing information | See 4B | | | | | | | |
| e. Write report | | | | | | | | |
| Notification of applicability [e, f] | 2 | 1 | 2 | 1.3 | 3 | 0.13 | 0.27 | $420.02 |
| 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 | 1.3 | 3 | 0.13 | 0.27 | $420.02 |

| 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) | (F) Management person-hours per year (F=Ex0.05) | (G) Clerical person-hours per year (G=Ex0.1) | (H) Cost ($) [b] |
|---|---|---|---|---|---|---|---|---|
| Notification of compliance status [e] | 4 | 1 | 4 | 56 | 224.0 | 11.2 | 22.4 | $35,281.46 |
| Waiver application [g] | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0.00 |
| Report of performance test | See 4B | | | | | | | |
| Semiannual reports [h] | 8 | 2 | 16 | 164 | 2,619 | 131 | 262 | $412,448.62 |
| Changing furnace classification [i] | 2 | 1 | 2 | 51 | 101.9 | 5.1 | 10.2 | $16,044.14 |
| ***Subtotal for Reporting Requirements*** | | | | | | **3,757** | | **$514,501** |
| 5. Recordkeeping requirements | | | | | | | | |
| a. Familarization with Regulatory Requirements | See 4A | | | | | | | |
| b. Plan activities | See 4E | | | | | | | |
| c. Implement activities | See 4B | | | | | | | |
| Verify lime injection rate | 0.1 | 36 | 3.6 | 164 | 589 | 29.5 | 58.9 | $92,800.94 |
| Changing furnace classification [i] | 2 | 1 | 2 | 51 | 102 | 5.1 | 10.2 | $16,044.14 |
| 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 | 56 | 4,368 | 218.4 | 436.8 | $687,988.39 |
| Area sources [k] | 0.5 | 52 | 26 | 108 | 2,808 | 140.4 | 280.8 | $442,278.25 |
| f. Time to train personnel [l] | 4 | 1 | 4 | 1.3 | 5 | 0.3 | 0.5 | $840.03 |
| 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 | 1.3 | 1 | 0.03 | 0.07 | $105.00 |
| All sources [n] | 0.25 | 2 | 0.5 | 164 | 82 | 4.09 | 8.18 | $12,889.02 |
| Sources that changed furnace | 1 | 1 | 1 | 51 | 51 | 2.55 | 5.09 | $8,022.07 |

| 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 (F=Ex0.05) | Clerical person-hours per year (G=Ex0.1) | Cost ($) [b] |
| classification [i] | | | | | | | | |
| i. Time for audits | N/A | | | | | | | |
| **Subtotal for Recordkeeping Requirements** | | | | | **9,207** | | | **$1,252,946** |
| **TOTAL LABOR BURDEN AND COST (rounded) °** | | | | | **13,000** | | | **$510,000** |
| **TOTAL CAPITAL AND O&M COSTS (rounded) °** | | | | | | | | **$4,650,000** |
| **GRAND TOTAL (rounded) °** | | | | | | | | **$5,160,000** |

**Assumptions:**

[a] We have assumed that the average number of respondents that will be subject to this rule will be 164, of which 56 are major sources. There will be approximately 1.3 new sources per year over the three-year period of this ICR.

[b] This ICR uses the following labor rates: Managerial $172.41 ($82.10+ 110%); Technical $141.75 ($67.50 + 110%); and Clerical $71.36 ($33.98 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2023, "Table 2. Civilian workers by occupational and industry group." The rates are from column 1, "Total compensation." The rates are 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.

[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.

[f] We have assumed new major sources will conduct 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 $^{o}$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 51 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) EPA person-hours per occurrence | (B) No. of occurrences per plant per year | (C) EPA person-hours per plant-year (C=AxB) | (D) Plants per year [a] | (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) Cost ($) [b] |
|---|---|---|---|---|---|---|---|---|
| Initial performance tests | 40 | 1.4 | 56 | 1.3 | 75 | 3.73 | 7.47 | $4,779 |
| Report performance test including retesting [c] | 48 | 1 | 48 | 1.3 | 64 | 3.2 | 6.4 | $4,096 |
| Notification of applicability | 0.5 | 1 | 0.5 | 1.3 | 0.67 | 0.03 | 0.07 | $43 |
| 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 | 1.3 | 2.66 | 0.13 | 0.27 | $170 |
| Notification of compliance status [d] | 2 | 1 | 2 | 56 | 112 | 5.6 | 11.2 | $7,169 |
| Report of performance test [c] | 40 | 1 | 40 | 1.3 | 53 | 2.67 | 5.33 | $3,414 |
| Repeat of performance test report [c] | 40 | 1 | 40 | 1.3 | 53 | 2.67 | 5.33 | $3,414 |
| Semiannual reports [e] | 4 | 2 | 8 | 164 | 1,309 | 65 | 131 | $83,803 |
| Review performance test reports and reports from facilities changing furnace classification [f] | 4 | 1 | 4 | 60 | 240 | 12 | 24 | $15,361 |
| **TOTAL (rounded) [i]** | | | | | **2,200** | | | **$122,000** |

**Assumptions:**

[a] We have assumed that the average number of respondents that will be subject to this rule will be 164, of which 56 are major sources. There will be approximately 1.3 new sources per year over the three-year period of this ICR.

[b] This cost is based on the average hourly labor rate as follows: Managerial $76.91 (GS-13, Step 5, $48.07 + 60%); Technical $57.07 (GS-12, Step 1, $35.67 + 60%); and Clerical $30.88 (GS-6, Step 3, $19.30+ 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), 2024 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.

[c] We have assumed that all existing respondents are in compliance with the initial rule requirements.

[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 51 reports/yr for changing furnace classification.

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

[h] Assumes that 10 percent of plants per year (0.1×6 = 0.6, rounded to 1) will report a malfunction incident.

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

## Number of Respondents

| | Respondents That Submit Reports | | Respondents That Do Not Submit Any Reports | | |
|---|---|---|---|---|---|
| | (A) | (B) | (C) | (D) | (E) |
| Year | Number of New Respondents [1] | 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 | Number of Respondents (E=A+B+C-D) |
| 1 | 1.3 | 161.0 | 0 | 0 | 162 |
| 2 | 1.3 | 162.3 | 0 | 0 | 164 |
| 3 | 1.3 | 163.7 | 0 | 0 | 165 |
| Average | 1.3 | 162.3 | 0 | 0 | 164 |

## 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 |
| Notification of applicability | 1.3 | 1 | 0 | 1.33 |
| Notification of construction/reconstruction | 1.3 | 1 | 0 | 1.33 |
| Notification of actual startup | 1.3 | 1 | 0 | 1.33 |
| Notification of special compliance requirements | 1.3 | 1 | 0 | 1.33 |
| Notification of performance test | 1.3 | 1 | 0 | 1.33 |
| Notification of compliance status | 56 | 1 | 0 | 56 |
| Waiver application | 0 | 1 | 0 | 0 |
| Semiannual reports | 164 | 2 | 0 | 327 |
| Changing furnace classification | 51 | 1 | 0 | 51 |
| | | **Total (rounded)** | | **441** |

**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) | Annual O&M Costs for One Respondent | Number of Respondents with O&M | Total O&M, (E x F) |
| Bag leak detectors[a] | $291,111 | 1.3 | $387,178 | $66,667 | 19 | $1,266,673 |
| Flow Meters[b] | $3,000 | 1.3 | $3,990 | $0 | 0 | $0 |
| Continuous opacity monitors[c] | $36,000 | 0 | $0 | $7,500 | 0 | $0 |
| Temporary hoods[d] | $21,650 | 109 | $2,359,716 | $0 | 0 | $0 |
| HF testing[e] | $11,000 | 1.3 | $14,630 | $11,000 | 8 | $89,640 |
| Furnace testing[f] | $10,000 | 1.3 | $13,300 | $10,000 | 51 | $509,317 |
| Temperature monitors[g] | $1,200 | 1.3 | $1,596 | $0 | 0 | $0 |
| Totals (rounded) [h] | | | $2,780,000 | | | $1,870,000 |

**Assumptions:**

[a] Assume that 34 percent of major sources (or 19 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.

[b] The operation and maintenance costs of chlorine flow meters are negligible.

[c] 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.

[d] An estimated 109 furnaces and 28 facilities would need temporary hoods installed every 5 years and testing conducted. Total annualized cost per furnace would average $21,650 per year.

[e] An estimated 8 affected facilities would incur a total annual O&M cost of $11,000 for measurement of hydrogen fluoride (HF) emissions.

[f] Switching furnace classifications would result in total annual O&M costs for testing of $500,000/yr or, for an estimated 51 furnaces, a cost of $10,000 per furnace.

[g] Temperature monitors will be installed at new sweat furnaces at a cost of $1,200. The O&M costs for temperature monitors are negligible.

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