

ATTACHMENT 1
SUPPORTING STATEMENT
New Source Performance Standards for Secondary Lead Smelters

TABLES 1, 2, and 3

Annual Respondent Burden and Cost of the NSPS for Secondary Lead Smelters – Years 1-3

TABLE 4

Summary of Annual Respondent Burden and Cost of the NSPS for Secondary Lead Smelters

TABLES 5, 6, and 7

Annual Agency Burden and Cost of the NSPS for Secondary Lead Smelters – Years 1-3

TABLE 8

Summary of Annual Agency Burden and Cost of the NSPS for Secondary Lead Smelters

I
lters (40 CFR Part 60, Subpart L)

Table 1: Annual Respondent Burden and Cost Year One – NSPS for Sec

Burden item	(A) Person - hours per occurrence
1. Applications	
2. Surveys and Studies	
3. Reporting Requirements	
A. Read and understand rule requirements	4
B. Required activities	
i. Notification of date of construction or reconstruction	2
ii. Notification of actual startup	2
iii. Notification of physical or operational change	2
iv. Notification of the anticipated date for conducting the opacity observations	2
v. Notification of performance test	2
vi. Conduct performance test ^c	24
vii. Repeat performance test ^d	24
viii. Semiannual report	2
ix. Central Data Exchange (CDX) and Compliance and Emissions Data Reporting Interface (CEDRI) ^e	8
x. Submit performance tests electronically to CDX/CEDRI	1
xi. Submit semiannual reports electronically to CDX/CEDRI	1
C. Gather Information	
D. Write Reports	
<i>Subtotal for Reporting Requirements</i>	
4. Recordkeeping Requirements	
A. Read and understand rule requirements	
B. Plan activities	
C. Implement activities	
D. Time to record information:	
i. Performance test results ^f	
ii. Semiannual report ^f	
E. Time to train personnel ^g	0
F. Time for audits ^h	
<i>Subtotal for Recordkeeping Requirements</i>	
TOTAL LABOR BURDEN AND COST	
Capital and O&M Cost (see Section 6(b)(iii)) ⁱ	
GRAND TOTAL (rounded) ^j	

Assumptions:

^a Two of the 11 existing facilities currently subject to subpart L will undergo reconstruction during the 3-year reporting period during the 3-year reporting period).

^b May 2021 labor rates from the United States Department of Labor, Bureau of Labor Statistics: \$56.62 per hour for Industrial (<https://www.bls.gov/oes/current/oes172112.htm>), and \$20.88 per hour for Office and Administrative Support Occupations (benefit packages available to those employed by private industry).

^c Facilities currently subject to NSPS Subpart L have previously demonstrated initial compliance.

^d Five percent of respondents (rounded to the nearest whole number) fail the compliance demonstration and will need to repeat

^e The facilities subject to Subpart L are also regulated by NESHAP Subpart X, which already requires submission of performance tests with the EPA's electronic reporting requirements for performance tests and for CDX/CEDRI registration.

^f NESHAP Subpart X already requires retention of performance test and semiannual reports. The burden estimate assumes that NESHAP Subpart X and NSPS Subpart L pollutants (i.e., no additional test reports for Subpart L compliance) and that the semiannual reports for Subpart L compliance).

^g Subpart L does not impose any additional personnel training burden.

^h The NSPS General Provisions (40 CFR 60.8(g)) requires a test method performance audit during conduct of the performance test.

ⁱ Facilities subject to Subpart L have already conducted initial performance tests for PM emissions and opacity.

^j Totals rounded to 3 significant figures. Figures may not sum exactly due to rounding.

Secondary Lead Smelting Facilities (40 CFR Part 60, Subpart L)

(B) No. of occurrence 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 (Ex0.05)	(G) Clerical person - hours per year (Ex0.1)	(H) Cost, \$ ^b
N/A						
N/A						
1	4	9	36	1.8	3.6	\$3,832
0	0	9	0	0	0	\$0
0	0	9	0	0	0	\$0
0	0	9	0	0	0	\$0
0	0	9	0	0	0	\$0
0	0	9	0	0	0	\$0
0	0	9	0	0	0	\$0
0	0	0	0	0	0	\$0
0	0	9	0	0	0	\$0
0	0	9	0	0	0	\$0
0	0	9	0	0	0	\$0
0	0	9	0	0	0	\$0
0	0	9	0	0	0	\$0
-----See 3B-----						
-----See 3B-----						
				41		\$3,832
-----See 3A-----						
-----See 3B-----						
-----See 3B-----						
N/A						
N/A						
0	0	9	0	0	0	\$0
-----See 3B-----						
				0		\$0
				41		\$3,832
						\$0
						\$4,000

d. These reconstructed sources will be subject to new subpart La (i.e., only 9 facilities will be subject to subpart L

l Production Manager (<https://www.bls.gov/oes/current/oes172112.htm>); \$45.77 per hour for Industrial Engineer (<https://www.bls.gov/oes/current/oes430000.htm>). EPA increased the BLS rates by 110 percent to account for the

at the performance test.

since tests using CDX/CEDRI. Therefore, no additional burden associated with the respondent's familiarization

if the testing contractor provides a single test report to the facility containing the results of the emissions tests for the annual report(s) incorporate both the NESHAP Subpart X and NSPS Subpart L information (i.e., no additional

test.

May 2021 BLS Wages	
Technical	\$45.77
Managerial	\$56.62
Clerical	\$20.88

Scalar to account for the benefi

Description
National estimate for Industrial Engineers
National estimate for Industrial Production Manager
National avg for Office and Administrative Support Occupations

t packages available to those employed by private industry =

Link	Wages for OMB Estimate
https://www.bls.gov/oes/current/oes172112.htm	\$96.12
https://www.bls.gov/oes/current/oes113051.htm	\$118.90
https://www.bls.gov/oes/current/oes430000.htm	\$43.85

110 %

Technical	\$92.59
Managerial	\$135.18
Clerical	\$54.71

Table 2: Annual Respondent Burden and Cost Year Two – N

Burden item
1. Applications
2. Surveys and Studies
3. Reporting Requirements
A. Read and understand rule requirements
B. Required activities
i. Notification of date of construction or reconstruction
ii. Notification of actual startup
iii. Notification of physical or operational change
iv. Notification of the anticipated date for conducting the opacity observations
v. Notification of performance test
vi. Conduct performance test ^c
vii. Repeat performance test ^d
viii. Semiannual report
ix. CDX and CEDRI ^e
x. Submit performance tests electronically to CDX/CEDRI
xi. Submit semiannual reports electronically to CDX/CEDRI
C. Gather Information
D. Write Reports
<i>Subtotal for Reporting Requirements</i>
4. Recordkeeping Requirements
A. Read and understand rule requirements
B. Plan activities
C. Implement activities
D. Time to record information:
i. Performance test results ^f
ii. Semiannual report ^f
E. Time to train personnel ^g
F. Time for audits ^h
<i>Subtotal for Recordkeeping Requirements</i>
TOTAL LABOR BURDEN AND COST
Capital and O&M Cost (see Section 6(b)(iii)) ⁱ
GRAND TOTAL (rounded) ^j

Assumptions:

^a Two of the 11 existing facilities currently subject to subpart L will undergo reconstruction during the 3-year reporting period).

^b May 2021 labor rates from the United States Department of Labor, Bureau of Labor Statistics: \$56.62 per hour for craft and laborers (https://www.bls.gov/oes/current/oes172112.htm), and \$20.88 per hour for Office and Administrative Support Occupations. Benefit packages available to those employed by private industry.

^c NESHAP Subpart X requires EPA Method 29 for the initial and annual emission tests for lead. The filter in the Method 29 test is replaced after the initial test and after the annual test. The burden is for coordinating with the testing contractor to include the results of the PM analysis in the three tests).

^d Five percent of respondents (rounded to the nearest whole number) fail the compliance demonstration and will not be required to conduct a performance test.

^e The facilities subject to Subpart L are also regulated by NESHAP Subpart X, which already requires submission of the EPA's electronic reporting requirements for performance tests and for CDX/CEDRI registration.

^f NESHAP Subpart X already requires retention of performance test and semiannual reports. The burden estimate is for NESHAP Subpart X and NSPS Subpart L pollutants (i.e., no additional test reports for Subpart L compliance) and semiannual reports for Subpart L compliance).

^g Subpart L does not impose any additional personnel training burden.

^h The NSPS General Provisions (40 CFR 60.8(g)) requires a test method performance audit during conduct of the test.

ⁱ The performance tests for PM cost approximately \$300/test/respondent (the additional burden needed to gravimetric facilities will conduct three PM tests per year (one for each type of furnace).

^j Totals rounded to 3 significant figures. Figures may not sum exactly due to rounding.

USPS for Secondary Lead Smelting Facilities (40 CFR Part 60, Subpart L)

(A) Person - hours per occurrence	(B) No. of occurrence 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 (Ex0.05)	(G) Clerical person - hours per year (Ex0.1)
N/A						
N/A						
4	0	0	9	0	0	0
2	0	0	9	0	0	0
2	0	0	9	0	0	0
2	0	0	9	0	0	0
2	0	0	9	0	0	0
2	1	2	9	18	0.9	1.8
24	1	24	9	216	10.8	21.6
24	0.05	1.2	0	0	0	0
2	2	4	9	36	1.8	3.6
8	0	0	9	0	0	0
1	1	1	9	9	0.45	0.9
1	0	0	9	0	0	0
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				321		
-----See 3A-----						
-----See 3B-----						
-----See 3B-----						
N/A						
N/A						
0	0	0	9	0	0	0
-----See 3B-----						
				0		
				321		

ring period. These reconstructed sources will be subject to new subpart La (i.e., only 9 facilities will be subject

or Industrial Production Manager (<https://www.bls.gov/oes/current/oes172112.htm>); \$45.77 per hour for Industrial Occupations (<https://www.bls.gov/oes/current/oes430000.htm>). EPA increased the BLS rates by 110 percent to account

Method 29 sampling train can be analyzed to obtain the PM measurements needed to demonstrate compliance with the final test report. The burden estimate assumes that facilities will test the blast, reverberatory, and pot furnaces

needed to repeat the performance test.

of performance tests using CDX/CEDRI. Therefore, no additional burden associated with the respondent's fami

assumes that the testing contractor provides a single test report to the facility containing the results of the emiss
that the semiannual report(s) incorporate both the NESHAP Subpart X and NSPS Subpart L information (i.e.,

performance test.

rically analyze the filter of EPA Method 29, which is required by NESHAP Subpart X). The burden estimate a:

(H)
Cost, \$ ^b
\$0
\$0
\$0
\$0
\$0
\$1,916
\$22,993
\$0
\$3,832
\$0
\$958
\$0
\$29,699
\$0
\$0
\$29,699
\$8,100
\$38,000

May 2021 BLS Wages	
Technical	\$45.77
Managerial	\$56.62
Clerical	\$20.88

Scalar to account for the benefi

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Description
National estimate for Industrial Engineers
National estimate for Industrial Production Manager
National avg for Office and Administrative Support Occupations

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Link	Wages for OMB Estimate
https://www.bls.gov/oes/current/oes172112.htm	\$96.12
https://www.bls.gov/oes/current/oes113051.htm	\$118.90
https://www.bls.gov/oes/current/oes430000.htm	\$43.85

110 %

Technical	\$92.59
Managerial	\$135.18
Clerical	\$54.71

Table 3: Annual Respondent Burden and Cost Year Three – NSPS for Se

Burden item	(A) Person - hours per occurrence
1. Applications	
2. Surveys and Studies	
3. Reporting Requirements	
A. Read and understand rule requirements	4
B. Required activities	
i. Notification of date of construction or reconstruction	2
ii. Notification of actual startup	2
iii. Notification of physical or operational change	2
iv. Notification of the anticipated date for conducting the opacity observations	2
v. Notification of performance test	2
vi. Conduct performance test ^c	24
vii. Repeat performance test ^d	24
viii. Semiannual report	2
ix. CDX and CEDRI ^e	8
x. Submit performance tests electronically to CDX/CEDRI	1
xi. Submit semiannual reports electronically to CDX/CEDRI	1
C. Gather Information	
D. Write Reports ^f	
<i>Subtotal for Reporting Requirements</i>	
4. Recordkeeping Requirements	
A. Read and understand rule requirements	
B. Plan activities	
C. Implement activities	
D. Time to record information:	
i. Performance test results ^f	
ii. Semiannual report ^f	
E. Time to train personnel ^g	0
F. Time for audits ^h	
<i>Subtotal for Recordkeeping Requirements</i>	
TOTAL LABOR BURDEN AND COST	
Capital and O&M Cost (see Section 6(b)(iii)) ⁱ	
GRAND TOTAL (rounded) ^j	

Assumptions:

^a Two of the 11 existing facilities currently subject to subpart L will undergo reconstruction during the 3-year reporting period during the 3-year reporting period).

^b May 2021 labor rates from the United States Department of Labor, Bureau of Labor Statistics: \$56.62 per hour for Industrial (<https://www.bls.gov/oes/current/oes172112.htm>), and \$20.88 per hour for Office and Administrative Support Occupations (benefit packages available to those employed by private industry).

^c NESHAP Subpart X requires EPA Method 29 for the initial and annual emission tests for lead. The filter in the Method 29 s. Subpart La. The burden is for coordinating with the testing contractor to include the results of the PM analysis in the final test (i.e., three tests).

^d Five percent of respondents (rounded to the nearest whole number) fail the compliance demonstration and will need to repeat the demonstration.

^e The facilities subject to Subpart L are also regulated by NESHAP Subpart X, which already requires submission of performance test reports with the EPA's electronic reporting requirements for performance tests and for CDX/CEDRI registration.

^f NESHAP Subpart X already requires retention of performance test and semiannual reports. The burden estimate assumes that the facilities subject to Subpart L are also subject to NESHAP Subpart X and NSPS Subpart L pollutants (i.e., no additional test reports for Subpart L compliance) and that the facilities submit semiannual reports for Subpart L compliance).

^g Subpart L does not impose any additional personnel training.

^h The NSPS General Provisions (40 CFR 60.8(g)) requires a test method performance audit during conduct of the performance test.

ⁱ The performance tests for PM cost approximately \$300/test/respondent (the additional burden needed to gravimetrically analyze the test results). Facilities that are required to conduct PM tests will conduct three PM tests per year (one for each type of furnace).

^j Totals rounded to 3 significant figures. Figures may not sum exactly due to rounding.

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(B) No. of occurrence 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 (Ex0.05)	(G) Clerical person - hours per year (Ex0.1)	(H) Cost, \$ ^b
N/A						
N/A						
0	0	9	0	0	0	\$0
0	0	9	0	0	0	\$0
0	0	9	0	0	0	\$0
0	0	9	0	0	0	\$0
0	0	9	0	0	0	\$0
1	2	9	18	0.9	1.8	\$1,916
1	24	9	216	10.8	21.6	\$22,993
0.05	1.2	0	0	0	0	\$0
2	4	9	36	1.8	3.6	\$3,832
0	0	9	0	0	0	\$0
1	1	9	9	0.45	0.9	\$958
0	0	9	0	0	0	\$0
-----See 3B-----						
-----See 3B-----						
				321		\$29,699
-----See 3A-----						
-----See 3B-----						
-----See 3B-----						
N/A						
N/A						
0	0	9	0	0	0	\$0
-----See 3B-----						
			0			\$0
			321			\$29,699
						\$8,100
						\$38,000

l. These reconstructed sources will be subject to new subpart La (i.e., only 9 facilities will be subject to subpart L

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May 2021 BLS Wages	
Technical	\$45.77
Managerial	\$56.62
Clerical	\$20.88

Scalar to account for the benefi

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National estimate for Industrial Engineers
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Link	Wages for OMB Estimate
https://www.bls.gov/oes/current/oes172112.htm	\$96.12
https://www.bls.gov/oes/current/oes113051.htm	\$118.90
https://www.bls.gov/oes/current/oes430000.htm	\$43.85

110 %

Technical	\$92.59
Managerial	\$135.18
Clerical	\$54.71

Table 4: Summary of Annual Respondent Burden and Cost of the NSPS for Secondary Lead Smelter

Year	Technical Hours	Management Hours	Clerical Hours	Total Labor Hours	Labor Costs
1	36	2	4	41	\$3,832
2	279	14	28	321	\$29,699
3	279	14	28	321	\$29,699
Total	594	30	59	683	\$63,230
Average	198	10	20	228	\$21,100

s (40 CFR Part 60, Subpart L)

Non-Labor (Capital/Startup and O&M) Costs	Total Costs
\$0	\$4,000
\$8,100	\$38,000
\$8,100	\$38,000
\$16,200	\$80,000
\$5,400	\$27,000

Table 5: Average Annual EPA Burden and Cost Year One – NSPS for Second

Activity	(A) EPA Hours per occurrence	(B) No of occurrences per year
1. Read and understand rule requirements	4	1
2. Review incoming notifications		
i. Notification of date of construction or reconstruction	1	0
ii. Notification of actual startup	1	0
iii. Notification of physical or operational change	1	0
iv. Notification of the anticipated date for conducting the opacity observations	1	0
v. Notification of performance test	1	0
vi. Performance test results	4	0
vii. Semiannual reports	4	0
TOTAL LABOR BURDEN AND COST (rounded) ^c		

Assumptions:

^a Two of the 11 existing facilities currently subject to subpart L will undergo reconstruction during the 3-year reporting period (be subject to subpart L during the 3-year reporting period).

^b This cost is based on the following labor rates which have been increased by 60 percent to account for the benefit packages : \$28.34 Clerical rate. These rates are from the Office of Personnel Management (OPM) “2022 General Schedule”, which excludes

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

Secondary Lead Smelters (40 CFR Part 60, Subpart L)

(C) EPA hours per year (C=AxB)	(D) Facilities per year ^a	(E) Technical hours per year (E=CxD)	(F) Managerial hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total Cost per Year ^b
4	9	36	1.8	3.6	\$2,114.35
0	9	0	0	0	\$0.00
0	9	0	0	0	\$0.00
0	9	0	0	0	\$0.00
0	9	0	0	0	\$0.00
0	9	0	0	0	\$0.00
0	9	0	0	0	\$0.00
0	9	0	0	0	\$0.00
41					\$2,200

d. These reconstructed sources will be subject to new subpart La (i.e., only 9 facilities will

be available to government employees: \$70.56 Managerial rate, \$52.37 Technical rate, and includes locality rates of pay.

2022 ICR Wages	
Technical	\$52.37
Managerial	\$70.56
Clerical	\$28.34

Table 6: Average Annual EPA Burden and Cost Year Two – NS

Activity	(A) EPA Hours per occurrence
1. Read and understand rule requirements	4
2. Review incoming notifications	
i. Notification of date of construction or reconstruction	1
ii. Notification of actual startup	1
iii. Notification of physical or operational change	1
iv. Notification of the anticipated date for conducting the opacity observations	1
v. Notification of performance test	1
vi. Performance test results	4
vii. Semiannual reports	4
TOTAL LABOR BURDEN AND COST (rounded) ^c	

Assumptions:

^a Two of the 11 existing facilities currently subject to subpart L will undergo reconstruction during the 3-year be subject to subpart L during the 3-year reporting period).

^b This cost is based on the following labor rates which have been increased by 60 percent to account for the be \$28.34 Clerical rate. These rates are from the Office of Personnel Management (OPM) “2022 General Schedu

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

PS for Secondary Lead Smelters (40 CFR Part 60, Subpart L)

(B) No of occurrences per year	(C) EPA hours per year (C=AxB)	(D) Facilities per year ^a	(E) Technical hours per year (E=CxD)	(F) Managerial hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total Cost per Year ^b
0	0	9	0	0	0	\$0.00
0	0	9	0	0	0	\$0.00
0	0	9	0	0	0	\$0.00
0	0	9	0	0	0	\$0.00
0	0	9	0	0	0	\$0.00
1	1	9	9	0.45	0.9	\$528.59
1	4	9	36	1.8	3.6	\$2,114.35
2	8	9	72	3.6	7.2	\$4,228.70
			135			\$6,900

· reporting period. These reconstructed sources will be subject to new subpart La (i.e., only 9 facilities will

enefit packages available to government employees: \$70.56 Managerial rate, \$52.37 Technical rate, and
ile”, which excludes locality rates of pay.

2022 ICR Wages	
Technical	\$52.37
Managerial	\$70.56
Clerical	\$28.34

Table 7: Average Annual EPA Burden and Cost Year Three – NS]

Activity	(A) EPA Hours per occurrence
1. Read and understand rule requirements	4
2. Review incoming notifications	
i. Notification of date of construction or reconstruction	1
ii. Notification of actual startup	1
iii. Notification of physical or operational change	1
iv. Notification of the anticipated date for conducting the opacity observations	1
v. Notification of performance test	1
vi. Performance test results	4
vii. Semiannual reports	4
TOTAL LABOR BURDEN AND COST (rounded) ^c	

Assumptions:

^a Two of the 11 existing facilities currently subject to subpart L will undergo reconstruction during the 3-year re] subject to subpart L during the 3-year reporting period).

^b This cost is based on the following labor rates which have been increased by 60 percent to account for the bene \$28.34 Clerical rate. These rates are from the Office of Personnel Management (OPM) “2022 General Schedule”

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

PS for Secondary Lead Smelters (40 CFR Part 60, Subpart L)

(B) No of occurrences per year	(C) EPA hours per year (C=AxB)	(D) Facilities per year ^a	(E) Technical hours per year (E=CxD)	(F) Managerial hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total Cost per Year ^b
0	0	9	0	0	0	\$0.00
0	0	9	0	0	0	\$0.00
0	0	9	0	0	0	\$0.00
0	0	9	0	0	0	\$0.00
0	0	9	0	0	0	\$0.00
1	1	9	9	0.45	0.9	\$528.59
1	4	9	36	1.8	3.6	\$2,114.35
2	8	9	72	3.6	7.2	\$4,228.70
			135			\$6,900

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, which excludes locality rates of pay.

2022 ICR Wages	
Technical	\$52.37
Managerial	\$70.56
Clerical	\$28.34

**Table 8: Summary of Annual Agency Burden and Cost of the NSPS for Secondary Lead
CFR Part 60, Subpart L)**

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs
1	36	2	4	41	\$2,200	\$0
2	117	6	12	135	\$6,900	\$0
3	117	6	12	135	\$6,900	\$0
Total	270	14	27	311	\$16,000	\$0
Average	90	5	9	104	\$5,300	\$0

Smelters (40

Total Costs
\$2,200
\$6,900
\$6,900
\$16,000
\$5,300

Semiannual training and certification =	2,044 \$/yr	(2009 \$)
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Base Cost Year =	2009
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Average Chem Eng Plant Cost Index =	521.9
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Cost Year =	2020
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Average Chem Eng Plant Cost Index =	596.2
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Semiannual training and certification =	2,335 \$/yr	(2020 \$)
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