

ICR Summary Information

Hours per Response	121
Number of Respondents	1
Total Estimated Burden Hours	972
Total Estimated Costs	\$135,000
Annualized Capital O&M	\$1,820
Total Annual Responses	8
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NESHAP for Primary Magnesium Refining (40 C

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences 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. Reporting requirements					
a. Familiarize with regulatory requirements	4	1	4	1	4
b. Process/review information	4	4	16	1	16
c. Write reports					
i. Initial notification	2	1	2	0	0
ii. Notification of compliance status ^c	2	1	2	1	2
iii. Notification of construction/reconstruction	2	1	2	0	0
iv. Notification of actual startup	2	1	2	0	0
v. Notification of performance test ^c	2	2	4	1	4
vi. Report of performance test ^{c, d}	180	2	360	1	360
vii. Semiannual report ^e	20	2	40	1	40
viii. Startup, shutdown, malfunction report	4	1	4	1	4
Subtotal for Reporting Requirements					
2. Recordkeeping requirements					
a. Familiarize with regulatory requirements	4	1	4	1	4
b. Plan activities	12	1	12	1	12
c. Implement activities	12	1	12	1	12
d. Time to train personnel	10	1	10	1	10
e. Time to enter information	-	-	-	-	-
f. Store, file, and maintain records ^f	1	365	365	1	365
g. Retrieve records/reports ^g	1	12	12	1	12
Subtotal for Recordkeeping Requirements					
Total Labor Burden and Costs (rounded) ^h					
Total Capital and O&M Costs (rounded) ^h					
Grand Total (rounded) ^h					

Assumptions:

^a There is one respondent subject to the rule, with no new sources expected over the next three years 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 \$109.00 (\$52.00 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2023, "Table 2. Civilian workers by occupation, sex, race, and hispanic or latino ethnicity, 2023." The rates are increased by 110 percent to account for varying industry wage rates and employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipment. Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

^c 40 CFR 63.9912 requires performance testing no less frequently than twice (at mid-term and renewal) of each term of the T emission point. For the U.S. Magnesium facility subject to this rule, we have assumed that 4 emission units must be tested twice. Performance tests are conducted for approximately two emission units in each year in the three year period of this ICR. We assume that the tests are repeated. (4 units x 2 tests / 5 years = 1.6 units per year, 1.6 units x 0.20 = 0.32 units with repeat testing, 1.6 + 0.32 = 1.92 or with an estimate of \$49,000 provided by the U.S. Magnesium facility.

- ^d We assume that this includes Method 23 test.
- ^e We assumed that it will take the respondent 20 hours two times per year to complete semiannual reports.
- ^f This includes inspection of unpaved areas.
- ^g We assume that it will take 1 hour once per month to retrieve records/reports.
- ^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

IFR Part 63, Subpart TTTTT) (Renewal)

(F) Management person hours per year (F=Ex0.05)	(G) Clerical person hours per year (G=Ex0.1)	(H) Annual costs (\$) ^b
0.2	0.4	\$630.03
0.8	1.6	\$2,520.10
0	0	\$0
0.10	0.20	\$315.01
0	0	\$0
0	0	\$0
0.20	0.40	\$630.03
18	36	\$56,702.34
2	4	\$6,300.26
0.2	0.4	\$630.03
494		\$67,728
0.2	0.4	\$630.03
0.6	1.2	\$1,890.08
0.6	1.2	\$1,890.08
0.5	1	\$1,575.07
-	-	-
18.25	36.5	\$57,489.87
0.6	1.2	\$1,890.08
477		\$65,365
972		\$133,000
		\$1,820
		\$135,000

Labor Rates:	
Management	\$172.41
Technical	\$141.75
Clerical	\$71.36

8 responses
121 hr/response

erical \$71.36 (\$33.98 + 110%). These rates
ccupational and industry group.” The rates are
the additional overhead business costs of
ing their employees. This ICR assumes that

itle V permit, or every 2.5 years, for each
ice during the permit term, and that
ssume that 20% of tests will need to be
' 2 units per year.) This estimate is consistent

Table 2: Average Annual EPA Burden and Cost – NESHAP for Primary Magnesium Refining (

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences 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. Initial performance test ^c	24	1.6	38.4	0	0
2. Repeat performance test ^c	24	0.32	7.68	0	0
3. Report review					0
a. Initial notification	8	1	8	0	0
b. Notification of performance test ^c	8	2	16	1	16
c. Notification of compliance status ^c	8	1	8	1	8
d. Notification of construction/reconstruction	8	1	8	0	0
e. Notification of actual startup	8	1	8	0	0
f. Report of performance test ^c	8	2	16	1	16
g. Semiannual report ^d	16	2	32	1	32
h. Startup, shutdown, malfunction report ^e	8	1	8	1	8
Total (rounded) ^f					

Assumptions:

^a There is one respondent subject to this rule, with no new sources expected over the next three years 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%); Techn and Clerical \$30.88 (GS-6, Step 3, \$19.30+ 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2024 General Schedule, which excluded increased by 60 percent to account for the benefit packages available to government employees.

^c 40 CFR 63.9912 requires a performance testing no less frequently than twice (at mid-term and renewal) of each term of each emission point. For the U.S. Magnesium facility subject to this rule, we have assumed that 4 emission units must be tested. Performance tests are conducted for approximately two emission units in each year in the three year period of this ICR. Work is repeated. (4 units x 2 tests / 5 years = 1.6 units per year, 1.6 units x 0.20 = 0.32 units with repeat testing, 1.6 + 0.32 = 1.92 units per year). Agency personnel only attend initial and repeat of initial performance tests.

^d We have assumed that it would take 16 hours two times per year to review semiannual reports.

^e We have assumed that it will take eight hours once per year to review the startup, shutdown, malfunction report.

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

40 CFR Part 63, Subpart TTTTT) (Renewal)

(F) Management person hours per year (F=E _x 0.05)	(G) Clerical person hours per year (G=E _x 0.1)	(H) Annual costs (\$) _b
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0.80	1.60	\$1,024.09
0.40	0.80	\$512.04
0	0	\$0
0	0	\$0
0.80	1.60	\$1,024.09
1.6	3.2	\$2,048.18
0.4	0.8	\$512.04
92		\$5,120

Labor Rates:	
Management	\$76.91
Technical	\$57.07
Clerical	\$30.88

ical \$57.07 (GS-12, Step 1, \$35.67 + 60%);
urs, and Clerical hours are 10 percent of
les locality, rates of pay. The rates have been

the Title V permit, or every 2.5 years, for
tested twice during the permit term, and that
'e assume that 20% of tests will need to be
2 or 2 units per year.) We assume that

Capital/Startup vs. Operation and Maintenance			
(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent ^a	Number of New Respondents	Total Capital/Startup Cost, (B X C)
CPMS	\$24,247	0	\$0
		Total (rounded) ^b	\$0

^a Costs were updated from 2007 \$ to 2024 \$ using the CEPCI CE Index.

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

ance (O&M) Costs

(E) Annual O&M Costs for One Respondent ^a	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
\$1,819	1	\$1,819
		\$1,820

2007 CEPCI CE Index:

2024 CEPCI CE Index:

525.4

796.2

Number of Respondents			
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports
	(A)	(B)	(C)
Year	Number of New Respondents ¹	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

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

(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

Total Annual Responses			
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports
Initial notification	0	1	0
Notification of compliance status	1	1	0
Notification of construction/reconstruction	0	1	0
Notification of actual startup	0	1	0
Notification of performance test ^a	1	2	0
Report of performance test ^a	1	2	0
Semiannual report	1	2	0
Startup, shutdown, malfunction report	1	1	0
			Total

^a 40 CFR 63.9912 requires performance testing no less frequently than twice (at mid-term and renew Title V permit, or every 2.5 years, for each emission point. For the U.S. Magnesium facility subject to this ICR, we assumed that 4 emission units must be tested twice during the permit term, and that performance test approximately two emission units in each year in the three year period of this ICR. We assume that 2 tests be repeated. (4 units x 2 tests / 5 years = 1.6 units per year, 1.6 units x 0.20 = 0.32 units with repeat 1.92 or 2 units per year.)

(E)
Total Annual Responses $E=(B \times C)+D$
0
1
0
0
2
2
2
1
8

al) of each term of the
o this rule, we have
s are conducted for
20% of tests will need to
testing, $1.6 + 0.32 =$