

ICR Summary Information

Hours per Response	186
Number of Respondents	318
Total Estimated Burden Hours	11,900
Total Estimated Costs	\$1,640,000
Annualized Capital O&M	N/A
Total Annual Responses	64
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NESHAP for Aluminum, Copper and Other No

Burden item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent	(C) Person- hours per respondent (C=A*B)	(D) Respondents per year ^b	(E) Technical person- hours per year (E=C*D)	(F) Management person-hours per year (F=E*0.05)
1. Applications	N/A					
2. Surveys and Studies	N/A					
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A					
4. Reporting Requirements						
A. Familiarize with Regulatory Requirements	4	1	4	318	1,272	63.6
B. Required activities						
Prepare management practices plan ^c	4	1	4	0	0	0
Initial performance tests ^c	40	1	40	0	0	0
Daily VE (30 days) then weekly VE ^{d,e}	0.1	78	7.8	23	179.4	8.97
C. Create information	See 4B					
D. Gather existing information	See 4B					
E. Write report	See 4B					
Initial notification of applicability ^c	4	1	4	0	0	0
Notification of compliance status ^c	4	1	4	0	0	0
Notification of construction/reconstruction	N/A					
Notification of anticipated startup	N/A					
Notification of actual startup	N/A					
Notification of special compliance requirements	N/A					
Request for compliance extension	N/A					
Notification of performance test ^c	1	1	1	0	0	0
Site specific test plan ^c	4	1	4	0	0	0
Notification of performance evaluation	N/A					
Quality assurance plan for CEMS/COMS	N/A					
NESHAP waiver request	N/A					
Startup, shutdown, and malfunction plan/reports ^c	4	1	4	0	0	0
Semiannual compliance reports ^f	8	2	16	31.8	508.8	25.44
Subtotal for Reporting Requirements					2,254	
5. Recordkeeping Requirements						
A. Familiarize with Regulatory Requirements	See 4A					
B. Plan activities	See 4A					
C. Implement activities	See 4A					
D. Develop record system ^c	4	1	4	0	0	0
E. Time to enter information	0.5	52	26	318	8,268	413.4
F. Time to transmit or disclose information	0.25	2	0.5	318	159	7.95
G. Time to train personnel ^c	4	1	4	0	0	0
H. Time for audits	N/A					
Subtotal for Recordkeeping Requirements					9,691	

TOTAL LABOR BURDEN AND COSTS (rounded)^g						11,900
TOTAL CAPITAL AND O&M COSTS (rounded)^g						
GRAND TOTAL (rounded)^g						

Assumptions:

^a This ICR uses the following labor rates: Managerial \$172.41 (\$82.10+ 110%); Technical \$141.75 (\$67.50 + 110%); and Clerical \$71.36. The rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2023, “Table 2. Civilian workers by occupation and wage rate.” The rates are increased by 110 percent to account for varying industry wage rates and business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and other costs. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

^b We have assumed that 318 foundries will be subject to the rule and will perform these activities over the 3-year term of the ICR.

^c This activity applies only to new respondents. There are no new respondents anticipated over the three-year period of this ICR.

^d We have assumed that all of the 23 foundries subject to the PM emission limit must perform the visible emissions observations over the 3-year term of the ICR.

^e This activity is based on daily VE for 30 days and weekly thereafter ($30 + 335/7 = 78$).

^f Semiannual compliance reports are required when deviations occur. We estimate that 10 percent of the foundries will experience deviations over the 3-year term of the ICR.

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

n-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ) (Renewal)

(G) Clerical person- hours per year (G=E*0.1)	(H) Cost ^a , \$
127.2	\$200,348.27
0	\$0
0	\$0
17.94	\$28,256.67
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
50.88	\$80,139.31
	\$308,744
0	\$0
826.8	\$1,302,263.74
15.9	\$25,043.53
0	\$0
	\$1,327,307

Labor Rates	
Management	172.41
Technical	141.75
Clerical	71.36

186 hr/response

	\$1,640,000
	\$0
	\$1,640,000

3 (\$33.98 + 110%). These
tional and industry group.”
nd the additional overhead
equipping their employees.

3 3-year term of the ICR.

ions.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Aluminum, Copper and

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent	(C) Plants per year	(D) Technical person-hours per year (D=A*B*C)	(E) Management person-hours per year (F=E*0.05)
Report Review:					
Initial notification of applicability	1	1	0	0	0
Startup, shutdown, malfunction plan/report	2	1	0	0	0
Notification of compliance status	2	1	0	0	0
Semiannual excess emissions report ^b	4	2	31.8	254.4	12.72
TOTAL ANNUAL BURDEN AND COST (rounded)^c				293	

Assumptions:

^a This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%); Technical \$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 are 10 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2024 General Schedule locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

^b Semiannual compliance reports are required when deviations occur. We estimate that 10 percent of the foundries will experience deviations.

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

Other Non-ferrous Metals Foundries (40 CFR Part 63, Subpart ZZZZZZ) (Renewal)

(F) Clerical person-hours per year (G=E*0.1)	(G) Cost ^a , \$
0	\$0
0	\$0
0	\$0
25.44	\$16,282.49
	\$16,300

Labor Rates	
Management	76.91
Technical	57.07
Clerical	30.88

\$57.07 (GS-12, Step 1, technical hours, and Clerical schedule, which excludes employees.

ence deviations.

The only costs to the regulated industry resulting from information collection activities required by the subject standard(s) are labor costs. There are no capital/startup and/or operation and maintenance costs.

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	318	0	0	318
2	0	318	0	0	318
3	0	318	0	0	318
Average	0	318	0	0	318

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

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	(E) Total Annual Responses $E=(B \times C)+D$
Notification of applicability	0	1	0	0
Notification of compliance status	0	1	0	0
Notification of performance test	0	1	0	0
Site specific test plan	0	1	0	0
Management practices plan	0	1	0	0
Startup, shutdown, and malfunction plan/reports	0	1	0	0
Semiannual compliance reports ¹	31.8	2	0	63.6
			Total (rounded)	64

¹ Semiannual compliance reports are required when deviations occur. We estimate that 10 percent of the foundries will experience deviations.