SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Primary Aluminum Reduction Plants

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Primary Aluminum Reduction Plants (40 CFR part 63, subpart LL) (Renewal)

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) standards for primary aluminum reduction plants were proposed on September 26, 1996, promulgated on October 7, 1997 and amended on November 2, 2005. These standards apply to the owner or operator of the affected facilities which include new or existing potlines, paste production plants, or anode bake furnaces associated with primary aluminum production and located at a major source, and for each new pitch storage tank associated with a primary aluminum reduction plant.

In general, all the NESHAP standards implement Section 12(b) of the Clean Air Act, as amended, and are based on the Administrator's determination that primary aluminum reduction plants emit or have the potential to emit hazardous air pollutants (HAPs). The standards ensure that all major sources of air toxic emissions achieve a level of control at least as low as the better controlled and lower emitting sources in each category. This involves the installation, operation and maintenance of particulate control devices such as electrostatic precipitators or scrubbers.

The major HAPs emitted by these facilities include hydrogen fluoride (HF) measured as total fluorides (TF) and polycyclic organic matter (POM). In addition to HAPs, this standard addresses particulate matter smaller than 10 microns in diameter (PM_{10}), which are controlled under the National Ambient Air Quality Standards (NAAQS).

All the NESHAP standards require initial notifications, performance tests, and periodic reports according to the general provisions specified in 40 CFR part 63, subpart A. With the exception of the performance specifications for continuous emission monitors (CEMs) in the general provisions, which are not applicable to HF CEMs because such specifications have not yet been developed for that device, all the general provisions requirements apply to sources subject to the NESHAP for primary aluminum reduction plants. Owners or operators 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 sources subject to the NESHAP standards.

Any owner or operator subject to the provisions of this part will maintain a file of these measurements, and retain the file for at least five years following the date of such occurrence, measurement, maintenance, corrective action, report or record. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the EPA regional office.

Approximately 16 existing primary aluminum facilities major sources of hazardous air pollutants are currently subject to the standard, and it is estimated that there will be no new growth in the industry over the next three years. However, we expect that one source per year will become subject to the standard over the next three years due to the reconstruction of an existing affected facility. The number of facilities decreased for the renewal of this ICR due to more accurate estimates of the number of existing and new facilities and closure of a few facilities due to economic factors, including cost of energy and market dynamics related to the amount of aluminum being recovered to produce aluminum products. The average annual cost to industry over the next three years of this Information Collection Request (ICR) is estimated to be $7,130,009 (rounded).

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

The 16 major source facilities in the United States, which are respondents to this ICR, are publicly owned and operated by primary aluminum reduction plants. None of the facilities are owned by either state, local and tribal agencies or the Federal Government.

2. Need for and Use of the Collection

2(a) Need/Authority for 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 or 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 hydrogen fluoride (HF), polycyclic organic matter (POM), and particulate matter smaller than 10 microns in diameter (PM_{10}) from primary aluminum reduction plants 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 LL.

2(b) Practical Utility/Users of the Data

The control of emissions of HAP emissions from HF, POM and PM_{10}, and HAPs from primary aluminum reduction plants requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. These emissions are the result of operation of specific point sources at these plants including potlines, paste production plants, pitch storage tanks and anode bake furnaces. The subject standards are achieved by the capture of particulate matter smaller than 10 microns in diameter from paste production plants.

The notifications required in the applicable regulations are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and the regulations are being met. Performance test reports are needed as these are the Agency's record of a source's initial capability to comply with the emission standards, and serve as a record of the operating conditions under which compliance was achieved. The excess emissions reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate the control equipment and achieve continuous compliance with the regulation. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with the applicable regulations, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart LL.

3(a) Nonduplication

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 their own similar 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, no duplication exists.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register 72 FR 10735 on March 9, 2007. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The assumptions made in the development of this ICR, including the estimate on the number of primary aluminum reduction plants subject to the NESHAP subpart LL rule, were reviewed and updated by the Agency in consultation with Mr. Robert Strieter of the Aluminum Association, who in turn consulted with some of the committee members.

In addition, we consulted the Agency's internal data sources including Donnalee Jones, the Agency contact for the residual risk rule on the primary aluminum industry sector, and the AFS (AIRS Facility Subsystem), which is the EPA database for the collection, maintenance, and retrieval of all compliance data. The information in AFS is reported by industry, in compliance with the recordkeeping and reporting provisions in the standard. AFS is operated and maintained by the Office of Compliance at EPA. We have estimated that there are approximately 16 existing respondents subject to the standard and no new sources will become subject to the standard over the three year period covered by this ICR.

The Agency also has the policy to respond after a thorough review of comments received from the public since the last ICR renewal as well as those submitted in response to the first Federal Register. In this case, no comments were received.

3(d) Effects of Less Frequent Collection

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 likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

These standards require affected facilities 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. Also, the retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than five years.

3(f) Confidentiality

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 (CBI) (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).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are primary aluminum reduction facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3334 which corresponds to the North American Industry Classification System (NAICS) 331312 for Primary Production of Aluminum.

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

All data in this ICR that are recorded and/or reported are required by National Emission Standards for Hazardous Air Pollutants for Primary Aluminum Reduction Plants (40 CFR
part 63, subpart LL).

A source must make the following reports:

Notifications	
Notification and application of construction/reconstruction.	63.05
Notification of initial compliance status.	63.850(a)(6)
Notification of compliance approach.	63.850(a)(8)
Initial notification when source becomes subject to standard.	63.9(b) and 63.850(a)
One-time notification for each affected source of the intent to use an HF continuous emission monitor.	63.850(a)(7)
Performance test results/reports.	63.10(d)(2), 63.850(a)(5) and 63.850(b)
Initial performance test.	63.07(b) and 63.09(e)
Rescheduled initial performance test.	63.07(b)(2)
Demonstration of continuous monitoring system, if applicable.	63.09(g)
Compliance status including excess emissions report.	63.09(h)

Reports	
Opacity or visible emissions.	63.10(d)(3), 63.845(h),and 63.845(i)
Periodic startup, shutdown, malfunction reports and, if applicable, implementation plan.	63.10(d)(5)(I) and 63.850(c)
Semiannual reports are required for periods of operation during which measured emissions exceed an applicable limit. If control device operating parameters are outside of the established ranges, quarterly reports are required as a result of excess emissions.	63.859(d)

A source must keep the following records:

Recordkeeping	
Startup, shutdown, malfunction periods where the continuous monitoring system is inoperative.	63.10(b)(2)
Emission test results and other data needed to determine emissions.	63.13(g)
All reports and notifications.	63.10(b)
A copy of the startup, shutdown, and malfunction plan and if applicable, of the implementation plan for emissions averaging.	63.850(e)(4)
Record of applicability.	63.10(b)(3)
Records for sources with continuous monitoring systems (CEMS) if it were used.	63.10(b)(3)
Records are required to be retained for five years. The most recent two years of records must be retained at the facility.	63.850(e)(1-2)
Aluminum production rate and anode production.	63.850(e)(4)
Records associated with an owner or operator request to monitor similar potlines, to perform reduced sampling, or to establish and alternative limit for a HF CEM system.	63.850(e)(4)
Design information for paste production plant capture systems and alternative control devices.	63.850(e)(4)
Emissions values from process and control devices.	63.859(e)(4)
Documentation that daily inspections of process and control devices were performed and corrective action(s) taken as required.	63.859(e)(4)

Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., hydrogen fluoride and polycyclic organic matter emit HAPs from these facilities. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. In addition, electronic reporting is increasingly allowed by regulatory agencies which, in turn, reduces the reporting burden. At this time, it is estimated that approximately 50 percent of the respondents use electronic recordkeeping.

(ii) Respondent Activities

Respondent Activities
Read instructions.
If approved by the appropriate regulatory agency, a respondent may install, calibrate, maintain, and operate an HF CMS for the monitoring of TF secondary emissions as an alternative method.
Install, calibrate, maintain, and operate a continuous parameter monitor for each emission control device including dry alumina scrubbers, dry coke scrubbers, wet scrubbers, electrostatic precipitators and wet roof scrubbers.
Perform performance test using reference methods specified in Appendix A of 40 CFR part 60 including initial performance test. An alternative test method for TF and POM emissions may be used provided the owner or operator has demonstrated the equivalency of the alternative method to a specific plant and has received previous approval from the applicable regulatory authority for its use, or it meets the criteria specified in sections 63.848(d)(1) and (d)(3) through (d)(6).
Comply with emission monitoring requirements to measure TF, POM and opacity as required.
Write the notification and reports listed above.
Enter information required to be recorded above.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using automated monitoring equipment that provides parameter data. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

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

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
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 AIRS Facility Subsystem (AFS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports conducted for anode bake furnaces and potlines, as well as for primary and secondary control systems, are used to discern the source's initial capability to comply with the standards and note the operating conditions under which compliance will be achieved. The regulatory authority will use performance test reports or design evaluation findings for pitch storage tanks to determine initial compliance with the standard. The semiannual emission reports, unless quarterly reports are required as a result of excess emissions, are used by the regulatory authority for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into the AFS which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for more than 100,000 industrial and government-owned facilities. EPA uses the AFS 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.

The records required by this regulation must be retained by the owner or operator for five years.

5(c) Small Entity Flexibility

A majority of the affected facilities are large entities (e.g., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. 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 requirements the minimum 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.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Respondent Cost and Burden: NESHAP for Primary Aluminum Reduction Plants (40 CFR part 63, subpart LL).

6. Estimating the Burden and Cost of the Collection

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, we have identified the specific tasks and the underlying assumptions. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 80,046 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.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	$105.86 ($50.41 + 110%)
Technical	$92.61 ($44.10 + 110%)
Clerical	$45.32 ($21.58 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2006, Table 2. Civilian Workers, by occupational and industry group. The rates are from column 1, Total compensation. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standards are labor costs which are addressed elsewhere in the ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
HF CEMs (similar potlines)	$100,000	0	$0	$1,669	16	$26,704
Method 14 (manifolds at potlines)	$200,000	0	$0	$3,339	12	$40,068
Method 14A (alcan cassettes)	$92,000	0	$0	$1,536	16	$24,576
Total			$0			$91,348

There is no annualized capital/startup cost for this ICR, as identified in the total of column D of the above table. The total operation and maintenance (O&M) cost for this ICR are $91,348, as identified in the total of column G of the above table. Therefore, the total annualized capital/startup cost and the operation and maintenance cost to industry over the next three years of the ICR is estimated to be $91,348.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such 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 cost during the three years of the ICR is estimated to be $10,247. This cost is based on the average hourly labor rate as follows:

Managerial	$58.18	(GS-13, Step 5, $36.36 + 60%)
Technical	$43.17	(GS-12, Step 1, $26.98+ 60%)
Clerical	$23.36	(GS-6, Step 3, $14.60 + 60%)

These rates are from the Office of Personnel Management (OPM) 2007 General Schedule which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: Annual Burden and Cost to the Federal/State Government: NESHAP for Primary Aluminum Reduction Plants (40 CFR part 63, subpart LL).

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, approximately 16 existing primary aluminum reduction plants are currently subject to the standard. It is estimated that no expected additional sources per year will become subject to the standard in the next three years.

The number of respondents over the three years period of this ICR is calculated using the following table:

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	1	16	0	1	16
2	1	16	0	1	16
3	1	16	0	1	16
Average	1	16	0	1	16

As shown in the above table, the average Number of Respondents over the three-year period of this ICR is 16. Please note that new respondents include sources with constructed, reconstructed and modified affected facilities. To avoid double-counting respondents, the total number of respondents that are also new respondents in column D is subtracted. In this standard, existing respondents that are also new respondents are required to submit initial notifications.

The average number of annual responses over the three year period of this ICR is calculated using the following table:

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=(BxC)+D
Notification of applicability	1	1	N/A	1
Notification of construction//reconstruction	1	1	N/A	1
Notification of actual startup	1	1	N/A	1
Notification of initial performance test	1	1	N/A	1
Notification of compliance status/approach	1	1	N/A	1
Semiannual report of monitoring exceedances	1.6	2	N/A	3.2
Semiannual report of no excess emissions	14.4	2	N/A	28.8
Startup, shutdown, malfunction report	1.6	2	N/A	3.2
Total				40.2

As shown on the above table, the Total Annual Responses is 40 (rounded). This estimate is based on the assumption that the results from the monthly, quarterly and annual performance tests will be submitted with the semiannual compliance reports.

The total annual labor burden and costs to industry are 80,046 hours and $7,130,009, respectively. The details regarding the respondent total labor burden and costs are found in Table 1. Annual Respondent Burden and Cost: NESHAP for Primary Aluminum Reduction Plants (40 CFR part 63, subpart LL), attached.

The total annual capital/startup and O&M costs to the regulated entity are $91,348, as discussed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs, above.

6(e) Bottom Line Burden Hours Burden Hours and Cost Tables

The bottom line burden hours and cost tables for both the Agency and the respondents are attached. The annual public reporting and recordkeeping burden for this collection of information is estimated to average 2,001 (rounded) hours per response.

6(f) Reasons for Change in Burden

The decrease in labor burden to industry from the most recently approved ICR is due a decrease in the number of existing primary aluminum reduction plants that are subject to NESHAP subpart LL. The number of facilities decreased for the renewal of this ICR due to a more accurate estimate of the number of existing facilities subject to the rule and closure of a few facilities due to economic factors, including cost of energy and market dynamics related to the amount of aluminum being recovered to produce aluminum products. The reduction in the number of respondents to this ICR also resulted in a decrease on the average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR.

In addition, there was a decrease in the burden to the Federal/State government in the renewal of the ICR is due to the decrease in the number of respondents. The costs associated with regulators attending performance tests were also removed from this ICR because this is an enforcement activity related to case development and, therefore, exempt from the requirements of the Paperwork Reduction Act.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 2,001 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; to develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of information; to search data sources; complete and review the collection of information; and to transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA's regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2007-0127. An electronic version of the public docket is available at http://www.regulations.gov/ which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2007-0127 and OMB Control Number

2060-0360 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

Table 1. Annual Respondent Burden and cost: NESHAP for Primary Aluminum Reduction Plants (40 CFR Part 63, Subpart LL)

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	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (E=0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Total Cost per year, $ [a]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	8	1	8	1 [b]	8.0	0.4	0.8	819.48
4. Reporting Requirements								
A. Read instructions	4	1	4	1 [b]	21.2	1.1	2.1	409.74
B. Required activities								
Initial performance test	100 [c]	1	100	1 [b]	120	6.0	12.0	12,292.20
Annual performance test	100 [c]	5.1 [d]	510	16 [e]	8160.0	408.0	816.0	835,,869.60
Monthly performance test (Method 13/14)	200 [f]	12	2400	12 [g]	28800.0	1440.0	2880.0	2,950,128.00
Monthly performance test (CEM or Alcan cassette)	40 [h]	18 [i]	720	16	11520.0	800.0	1600.0	1,180,051.20
Quarterly performance test	200 [j]	16 [k]	3200	2 [l]	6400.0	320.0	640	655,584.00
Daily monitoring	2	365	730	16	11,680.0	584.0	1,168.0	1,196,440.80
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report								
Notification of applicability	2	1	2	1 [b]	2.0	0.1	0.2	204.87
Notification of construction./reconstruction	2	1	2	1 [b]	2.0	0.1	0.2	204.87
Notification of actual startup	2	1	2	1 [b]	2.0	0.1	0.2	204.87
Notification of special compliance requirements	N/A							
Notification of performance test	2	1	2	16 [b]	32.0	1.6	3.2	3,277.92

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	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (E=0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Total Cost per year, $ [a]
Notification of compliance status	4	1	4	16 [b]	64.0	3.2	6.4	6,555.84
NESHAP waiver application	N/A							
Report of performance test	See 4B							
Report of monitoring exceedances	16	2 [m]	32	1.6 [n]	51.2	2.56	5.1	5,244.67
Report of no excess emissions	8	2 [m]	16	14.4 [o]	230.4	11.5	23.0	23,601.02
Startup, shutdown, malfunction report	8	2 [m]	16	1.6 [p]	25.6	1.3	2.6	2,622.34
Startup, shutdown, malfunction plan	40	1	40	1 [b]	0.0	0.0	0.0	0.00
5. Recordkeeping Requirements								
A. Read instructions	See 4B							
B. Plan activities	N/A							
C. Implement activities	See 4B							
D. Develop record system	N/A							
E. Time to enter information								
Records of all information required by standards	3 [q]	52 [q]	156	16	2496.0	124.8	249.6	255,677.76
F. Time to train personnel	N/A							
G. Time to adjust existing ways t to comply with previously applicable requirements	N/A							
H. Time to transmit or disclose Information	0.25 [r]	2 [m]	0.5	16	8.0	0.4	0.8	819.48
I. Time for audits	N/A							
Subtotal					69,605.2	3,480.3	6,960.5	7,130,008.66

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	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (E=0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Total Cost per year, $ [a]
TOTAL LABOR BURDEN AND COST (Rounded)					80,046			7,130,009

Assumptions:

[a] This ICR uses the following labor rates: $105.86 for Managerial labor, $92.61 for Technical labor, and $45.32 for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2006, ATable 10. Private industry, by occupational and industry group.@ The rates are from column 1, ATotal compensation.@ The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

[b] Assumes that one plant per year will have to comply with initial rule requirements due to a reconstruction of an affected facility (i.e., pitch storage tank). It is assumed that the plant has a startup, shutdown and malfunction plan in place.

[c] Assumes it takes 100 hours each for Method 13 and Method 315 for primary controls of potlines and bake furnaces.

[d] Assumes 59 Method 13 tests and 22 Method 315 tests will be conducted each year (primary control systems) for a total of 81 tests for 16 respondents (81/16 = 5.1 per respondent).

[e] Assumes that there are 16 primary aluminum plants subject to this standard. [f] Assumes it takes 200 hours for Method 13/14 for secondary emissions from potlines.

[g] Assumes that 12 potlines must perform manual sampling as a result of the NESHAP. Testing was already required by the States for other potlines.

[h] Assumes it takes 40 hours for testing of similar potlines (CEM or Alcan cassette).

[i] Assumes that 24 potlines will be monitored under the alternative monitoring provisions for similar potlines. This is 18 per respondent (24*12/16 = 18).

[j] Assumes it takes 200 hours for a Method 315 test for secondary emissions.

[k] Assumes that a total of 8 Soderberg potlines at two plants, this is 16 per respondent (8*4/2 = 16).

[l] Assumes that two Soderberg plants will conduct quarterly performance tests.

[m] This rule requires that all existing respondents submit semiannual reports. Performance test results will be submitted with the semiannual reports.

[n] Assumes that 10 percent fail to meet the standard (0.1 x 16).

[o] Assumes that 90 percent meet the standard (0.9 x16).

[p] Assumes that 10 percent must file startup, shutdown, malfunction report (0.1 x 16).

[q] Assumes it takes 3 hours per week per plant to enter monitoring data into records.

[r] Assumes it takes 15 minutes to transmit recorded information.

N/A = Not Applicable.

Table 2. Annual Burden and Cost to the Federal/State Government: NESHAP for Primary Aluminum Reduction Plants (40 CFR part 63, subpart LL)

Burden Item	(A) Person Hours Per Occurrence	(B) Number of Occurrences Per Plant Per Year	(C) Person Hours Per Plant Per Year (C=AxB)	(D) Plants Per Year	(E) Technical Hours Per Year (E=CxD)	(F) Management Hours Per Year (F=0.05xE)	(G) Clerical Hours Per Year (G=0.1xE)	(H) Total Costs Per Year, $ [a]
New or reconstructed Facilities								
Notification of applicability	2	1	2	1 [b]	2.0	0.1	0.2	96.83
Notification of construction and reconstruction	2	1	2	1 [b]	2.0	0.1	0.2	96.83
Notification of actual startup	2	1	2	1 [b]	2.0	0.1	0.2	96.83
Notification of special compliance requirements	N/A							
Notification of initial performance test	2	1	2	1 [b]	2.0	0.1	0.2	96.83
Notification of compliance status	8	1	8	1 [b]	2.0	0.1	0.2	96.83
Existing Facilities								
Review of performance test report	8	1	8	16 [d]	128.0	6.4	12.8	6,197.12
Review of excess emissions report	8	1	8	1.6 [c]	12.8	0.6	1.3	617.85
Review of no excess emissions report	2	2	4	14.4 [e]	57.6	2.9	5.8	2,790.80
Review of NESHAP waiver application	N/A							
Review of startup, shutdown, malfunction report	2	1	2	1.6 [f]	3.2	0.2	0.3	156.79
Subtotal					211.6	10.6	21.2	10,246.71

Burden Item	(A) Person Hours Per Occurrence	(B) Number of Occurrences Per Plant Per Year	(C) Person Hours Per Plant Per Year (C=AxB)	(D) Plants Per Year	(E) Technical Hours Per Year (E=CxD)	(F) Management Hours Per Year (F=0.05xE)	(G) Clerical Hours Per Year (G=0.1xE)	(H) Total Costs Per Year, $ [a]
TOTAL LABOR BURDEN and COST (rounded)					243			10,247

Assumptions:

[a] This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: $58.18 for Managerial (GS-13, Step 5, $36.36 + 60%), $43.17 for Technical (GS-12, Step 1, $26.98+ 60%) and $23.36 Clerical (GS-6, Step 3, $14.60 + 60%). These rates are from the Office of Personnel Management (OPM) A2007 General Schedule@ which excludes locality rates of pay.

[b] Assumes that one plant per year over the next three years will install a new or reconstructed pitch storage tank.

[c] Assumes that 10 percent of the 16 plants (1.6) will have excess emissions.

[d] Assumes that EPA/State personnel will review summary of performance tests requirements to be submitted by all 16 existing plants on an annual basis for purposes of calculating the burden. However, plants are expected to submit performance test results with the semiannual reports.

[e] Assumes that the remaining 90 percent of the 16 plants (14.4) will not have excess emissions.

[f] Assumes that 10 percent of plants per year (1.6) will report a startup, shutdown, malfunction incident.

N/A = Not Applicable.