

Table 1: Annual Respondent Burden and Cost – NESHAP for the Secondary Lead Smelter I

Burden item	(A) Person-hours per occurrence	(B) Annual occurrences per respondent	(C) Person-hours per respondent per year (A x B)
1. Applications	N/A		
2. Surveys and studies	N/A		
3. Reporting requirements			
A. Familiarization with the regulatory requirements ^a	1	1	1
B. Required activities ^c			
Annual performance test	330	1	330
THC testing	10	1	10
Dioxin/furan testing	10	1	10
Lead testing	10	0.5	5
Continuous particulate monitor	1	52	52
Differential pressure monitor	2	1	2
Inspect capture hoods	8	12	96
Inspect and repair enclosures	20	12	240
Inspect battery storage areas	8	52	416
Revise SOP manual ^d	20	1	20
C. Create information	See 3B		
D. Gather information	See 3E		
E. Report preparation			
Notification of performance test ^e	2	2	4
Semiannual compliance report	16	2	32
Annual (performance test) report ^e	10	2	20
Differential pressure monitoring report ^f	10	1	10
Reporting Subtotal			
1. Recordkeeping requirements			
A. Familiarization with the regulatory requirements	See 3A		
B. Implement activities	N/A		
C. Develop record system	N/A		
D. Record information			
Fugitives	1	12	12
Flow weighted averages for lead	1	1	1
Continuous particulate monitor	1	52	52
Differential pressure monitors	1	12	12
Power outages	1	12	12
Facility enclosure inspections	1	12	12
Startup and shutdown periods	1	12	12
Malfunctions	2	6	12
Actions taken during malfunctions	1	6	6
Bag Leak Detection System	1	12	12
Furnace inspections	1	12	12

Plastic battery casing material recovery	1	6	6
Monitoring parameters, performance tests, and periodic inspections	3.5	52	182
E. Personnel training	8	1	8
F. Time for audits	N/A		
Recordkeeping Subtotal			
TOTAL ANNUAL BURDEN AND COST (ROUNDED)^g			
TOTAL CAPITAL AND O&M COST (rounded)^g			
GRAND TOTAL (rounded)^g			

Assumptions:

a EPA estimates an average of 12 existing facilities and no new or modified facilities per year will facilities there is one inactive facility that has been idled since 2013. We assume that each source s year. Since there are no new or modified/reconstructed facilities expected the notifications for star initial compliance will not occur during this three-year ICR period.

^b This ICR uses the following labor rates: \$112.98 (technical), \$149.35 (managerial), and \$54.81 (Labor Statistics, June 2017, “Table 2. Civilian workers, by occupational and industry group.” The percent to account for the benefit packages available to those employed by private industry.

^c Testing frequency was assumed as follows, based on rule requirements and experience with the af Dioxin/Furan tests are required every 6 years, and this ICR assumes 2 of the 12 sources conduct di requests extensions for this test and the tests occur every two years. This ICR assumes 6 of the 12 continuous particulate monitors and that two differential pressure monitors exist per source. Since requirement in the rule is not accounted for in the burden estimate. In addition, each facility must c of battery storage areas that are not in enclosures.

^d EPA assumes each facility will make one major adjustment per year. In each instance, the SOP r e EPA assumes one notification and one test report for each test conducted will be submitted. Thei each of these activities.

f EPA assumes that one report will be submitted for all differential pressure monitors at the facility

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

Industry (40 CFR Part 63, Subpart X) (Renewal)

(D) Respondents per year ^a	(E) Technical hours per year (C x D)	(F) Management hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.10)	(H) Annual cost (\$) ^b
12	12	0.6	1.2	1,511.14
12	3,960	198	396	498,676.86
12	120	6	12	15,111.42
2	20	1	2	2,518.57
6	30	1.5	3	3,777.86
12	624	31.2	62.4	78,579.38
24	48	2.4	4.8	6,044.57
12	1,152	57.6	115.2	145,069.63
12	2,880	144	288	362,674.08
12	4,992	249.6	499.2	628,635.07
1	20	1	2	2,518.57
12	48	2.4	4.8	6,044.57
12	384	19.2	38.4	48,356.54
12	240	12	24	30,222.84
12	120	6	12	15,111.42
		16,848		1,844,853
12	144	7.2	14.4	18,133.70
12	12	0.6	1.2	1,511.14
12	624	31.2	62.4	78,579.38
24	288	14.4	28.8	36,267.41
12	144	7.2	14.4	18,133.70
12	144	7.2	14.4	18,133.70
12	144	7.2	14.4	18,133.70
12	144	7.2	14.4	18,133.70
12	72	3.6	7.2	9,066.85
12	144	7.2	14.4	18,133.70
12	144	7.2	14.4	18,133.70

12	72	3.6	7.2	9,066.85
12	2,184	109.2	218.4	275,027.84
0	0	0	0	0
		4,899		536,455
		21,700		2,380,000
				251,000
				2,630,000

be subject to the NESHAP over the next 3 years. In addition to the 12 active subject to the standard will have to familiarize with the regulatory requirements each year, intention to construct/reconstruct, notification of applicability and notification of

clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics. These rates are from column 1, "Total compensation." They have been increased by 110

affected source actual testing schedule. THC testing is conducted annually. VOC testing is conducted annually. Oxidant/furan tests each year. Lead testing is required annually but many sources do not conduct lead tests each year. The ICR estimates that all sources have particulate monitors, the visible emission observation method, and conduct monthly inspections of capture hoods and enclosures, and weekly inspections

must be revised.

There are 20 tests for the 12 sources, $20/12 = 1.67$, or 2 responses per respondent for

y.

Labor Rates

TECH	112.98
MGMT	149.35
CLER	54.81

Source Type	
Existing	12
New	0

- Monthly requirement per 63.544(d)
- Monthly requirement per 63.544(d)
- Weekly requirement per 63.545(c)(4)

Note - removed work practice SOP line item as it wasn't in the SS table of reports and I didn't find it in the rule

255 hours per response

22.82

: language "Work practice SOP". Previously there were no respondents.

Table 2: Average Annual EPA Burden and Cost – NESHAP for the Secondary Lead Sn

Burden item	(A) EPA person-hours per occurrence	(B) Annual occurrences per respondent	(C) EPA person- hours per respondent per year (A x B)
1. Applications	N/A		
2. Required activities			
A. Observe stack tests ^c	48	1	48
B. Excess emissions - enforcement activities ^d	24	1	24
C. Create information	N/A		
D. Gather information	N/A		
E. Report reviews			
Notification of performance test	3	2	6
Semiannual report	10	2	20
Annual report	10	2	20
Differential pressure monitoring report	3	1	3
F. Prepare annual summary report ^e	4	12	48
TOTAL ANNUAL BURDEN AND COST (ROUNDED)^f			

Assumptions:

^a EPA estimates an average of 12 existing facilities and no new facilities per year will be subject to the NESHA

^b This ICR uses the following labor rates: \$48.08 (technical), \$64.80 (managerial), and \$26.02 (clerical). These excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages.

^c EPA assumes Agency personnel will attend 20% of facility stack tests (0.2 x 20 tests on average across the

^d EPA assumes 10% of facilities will have excess emissions (0.1 x 12 = 1, after rounding).

^e EPA assumes state and EPA personnel will require 4 technical hours per respondent when preparing the annual

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

Relter Industry (40 CFR Part 63, Subpart X) (Renewal)

(D) Respondents per year^a	(E) Technical hours per year (C x D)	(F) Management hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.10)	(H) Annual cost (\$)^b
4	192	9.6	19.2	10,353.02
1	24	1.2	2.4	1,294.13
12	72	3.6	7.2	3,882.38
12	240	12	24	12,941.28
12	240	12	24	12,941.28
12	36	1.8	3.6	1,941.19
1	48	2.4	4.8	2,588.26
		980		45,900

IP over the next 3 years.

Rate rates are from the Office of Personnel Management (OPM), 2017 General Schedule, which available to government employees.

12 facilities = 4, after rounding).

Annual summary report (12 x 4 = 48).

Labor Rates

TECH 48.08

MGMT 64.8

CLER 26.02

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents	(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	12	0	0	12
2	0	12	0	0	12
3	0	12	0	0	12
Average	0	12	0	0	12

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

*Revised from 14 to 12 to match latest source inventory per Nathan Topham

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 Performance Test	12	2	0	24
Semiannual compliance report	12	2	0	24
Annual (performance test) report	12	2	0	24
Differential pressure monitoring report	12	1	0	12
Revised SOP	1	1	0	1
			Total	85

Capital/Startup and O&M Costs (taken directly from prev ICR burden tables, columns B, C, and K)

Burden item	Stack Testing Cost Per Occurrence*	Other Non-Labor Costs Per Occurrence*	Annual occurrences per respondent	Respondents per year ^a
THC testing	\$4,700		1	12
Dioxin/furan testing	\$19,300		1	2
Lead testing	\$10,000		1	6
Differential pressure monitor (initial capital)		\$2,300	1	0
Differential pressure monitor (annual O&M)		\$230	1	12
HEPA filter monitor (initial capital)		\$32,759	1	0
HEPA filter monitor (annual O&M)		\$4,665	1	0

*Costs in red were tallied as O&M in prev ICR.

Rows highlighted in blue denote new items added to burden calculations.

Capital/Startup vs. Operation and Maintenance (O&M) Costs				
(A)	(B)	(C)	(D)	(E)
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
THC testing	\$0	0	\$0	\$4,700
Dioxin/furan testing ¹	\$0	0	\$0	\$19,300
Lead testing ²	\$0	0	\$0	\$10,000
Continuous particulate monitor ³	\$0	0	\$0	\$7,500
Differential pressure monitor ⁴	\$2,300	0	\$0	\$230
HEPA filter monitor	\$32,759	0	\$0	\$4,665
Total	\$35,059		\$0	\$46,395

1 Dioxin/Furan testing occurs every 6 years, or 12 facilities/6 years = 2 facilities per year.

2. Lead testing is required annually, but there are provisions by which facilities can apply for an extension. This ICR ass for an extension to test once every 24 months. 12 facilities/2 years = 6 facilities per year conducting lead testing.

3. EPA has assumed that all faciilites will have CPMs.

4. EPA has assumed that each facility will have two differential pressure monitors.

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

ars notes

test occurs every 6 years so assume 2 respondents per year

lead testing is every year with the option for requesting an extension to every 24 months, or 6 sources per year

(F)	(G)
Number of Respondents with O&M	Total O&M, (E X F)
12	\$56,400
2	\$38,600
6	\$60,000
12	\$90,000
24	\$5,520
0	\$0
	\$251,000

changed to match latest facility inventory
required every 6 years, so $12 \text{ sources} / 6 \text{ years} = 2$. This should not have been z
changed to match latest facility inventory, divided by 2 per note about extensi
changed to match latest facility inventory
change this to 24, assuming two differential pressure monitors per facility.

umes all facilities will apply

zero previously.
ion