

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal), EPA ICR Number 1894.08, OMB Control Number 2060-0433.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production were proposed on February 11, 1999, promulgated on March 23, 2000, and amended on December 30, 2002 (67 FR 79808), September 3, 2004 (69 FR 53980), October 3, 2005 (70 FR 57513), December 19, 2005 (70 FR 75320), and August 14, 2015. These regulations apply to secondary aluminum production facilities that are major sources of hazardous air pollutants (HAP) commencing construction, or reconstruction after the date of proposal. This includes facilities that operate aluminum scrap shredders, thermal chip dryers, scrap dryers/delacquering kilns/decoating kilns, group 1 furnaces, group 2 furnaces, sweat furnaces, dross only furnaces, rotary dross coolers, and secondary aluminum processing units (SAPUs). The SAPUs include group 1 furnaces and in-line fluxers.

The regulations also apply to secondary aluminum production facilities that are area sources of HAP only with respect to emissions of dioxins/furans (D/F) from thermal chip dryers, scrap dryers/delacquering kilns/decoating kilns, group 1 furnaces, sweat furnaces, and SAPUs. New facilities include those that commenced construction, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart RRR.

The 2015 rule amendment include a requirement to report performance testing through the Electronic Reporting Tool (ERT); provisions allowing owners and operators to change furnace classifications; requirements to account for unmeasured emissions during compliance testing for group 1 furnaces that do not have add-on control devices; alternative compliance options for the operating and monitoring requirements for sweat furnaces; compliance provisions for hydrogen fluoride; provisions addressing emissions during periods of startup, shutdown, and malfunction (SSM); and other corrections and clarifications to the applicability, definitions, operating, monitoring and performance testing requirements.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They 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 affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. 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 United States Environmental Protection Agency (EPA) regional office.

The secondary aluminum industry consists of approximately 161 secondary aluminum production facilities, of which the EPA estimates 53 to be major sources of HAP. The burden to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal). The burden to the “Federal Government” burden is attributed entirely to work performed by federal employees or government contractors and can be found in Table 2: Average Annual EPA Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal).

Over the next three years, approximately 161 respondents per year will be subject to the standard. We do not estimate any additional new major sources over the three-year period of this ICR.

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

## **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/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 secondary aluminum production facilities 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 RRR.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard 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, that leaks are being detected and repaired, and that the standard is being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

## **3. Nonduplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart RRR.

### **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 its 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 (80 FR 32116) on June 5, 2015. No comments were received on the burden published in the Federal Register.

### **3(c) Consultations**

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts during development of the 2015 final rule.

Industry trade association and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted the Aluminum Association, at (703) 358-2960; and the North American Die Casting Association (NADCA), at (847) 808-3162. The Aluminum Association submitted comments that resulted in an increase in the capital/startup and operation and maintenance costs for bag leak detectors, as calculated in section 6(b)(iii). The NADCA also provided comments, but they did not result in changes to the ICR.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice.

### **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 proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

### **3(e) General Guidelines**

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

These standards require the respondents 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. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement

action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

### **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 (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**

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

## **4. The Respondents and the Information Requested**

### **4(a) Respondents/SIC Codes**

The respondents to the recordkeeping and reporting requirements are secondary aluminum production facilities. The United States Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) codes for secondary aluminum production facilities are listed below.

<b>Standard (40 CFR, Part 63, Subpart RRR)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Secondary Smelting and Alloying of Aluminum	3341, 3399	331314
Primary Aluminum Production	3334	331312
Aluminum Sheet, Plate, and Foil Manufacturing	3353	331315
Aluminum Extruded Product Manufacturing	3354	331316
Other Aluminum Rolling and Drawing	3355	331319
Aluminum Die-Casting Foundries	3363	331521
Aluminum Foundries (except Die-Casting)	3365	331524

### **4(b) Information Requested**

#### **(i) Data Items**

In this ICR, all the data that is recorded or reported is required by the NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR).

A source must make the following reports:

<b>Notifications</b>	
Initial notification that a source is subject to the standard	63.9(b)(1)-(3), 63.1515(a)(1)-(2)
Anticipated and actual date of startup	63.1515(a)(3)(iii)- (iv)
Intention to construct/reconstruct	63.9(b)(4)-(5), 63.1515(a)(3)-(4)
Special compliance obligations for a new source	63.9(d), 63.1515(a) (5)
Initial performance test and visible emission observations	63.9(e)-(f), 63.10(d) (2)-(3), 63.1515(a)(6)
Reschedule initial performance test	63.7(b)(2)
Demonstration of continuous monitoring systems	63.9(g), 63.1515(a) (7)

<b>Reports</b>	
Notification of compliance status report	63.9(h), 63.1515(b)
Operation, maintenance, and monitoring plan for each emission unit to be approved by the permitting authority	63.6(e)(1)-(2), 63.1515(b)(9)
Semiannual report	63.10(e), 63.1516(b)
Annual compliance certification	63.1516(c)

A source must keep the following records:

<b>Recordkeeping</b>	
Emission test results and other data needed to determine emissions	61.13(g)
All reports and notifications	63.10(b)
Record of applicability	63.10(b)(3)
Records of total operating times and operating data (e.g., opacity, temperature, feed materials)	63.1517(b)(1)-(5), (7),(9)-(12),(17)
Records of date and time of excess emissions, and a brief description of the cause and any corrective actions taken	63.1517(b)(1)-(5)

<b>Recordkeeping</b>	
Records of inspections	63.1517(b)(2)(ii), (4),(13),(14)
Copies of all required plans, with records documenting conformance with the applicable plan	63.1517(b)(8),(16)
Records of sources with continuous monitoring systems	63.10(c), 63.1517(b)(6)
Records are required to be retained for five years	63.10(b)(1), 63.1517(a)(1)

### Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

The 2015 rule amendment includes a requirement to report performance testing through the Electronic Reporting Tool (ERT). The ERG will generate an electronic report package which will be submitted to the Compliance and Emissions Data Reporting Interface (CEDRI) and then archived to the EPA's Central Data Exchange (CDX). This requirement does not create any additional performance testing and will only apply to those performance tests conducted using test methods that are supported by the ERT.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate continuous parameter monitors (e.g. temperature monitors), continuous opacity monitors, flow monitors and bag leak detectors, if applicable.
Perform initial performance test, Reference Methods 1, 2, 3, 4, 5, 9, 23, 25A, 26A, test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.

<b>Respondent Activities</b>
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

## **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.

<b>Agency Activities</b>
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 Enforcement and Compliance History Online (ECHO) and ICIS.

### **5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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/operator for five years.

### **5(c) Small Entity Flexibility**

The majority of the respondents are large entities (i.e., 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 to be the minimum requirements 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 below Table 1: Annual Respondent Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal).

## **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, specific tasks and major assumptions have been identified. 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 12,600 (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	\$129.93 (\$61.87+ 110%)
Technical	\$103.97 (\$49.51 + 110%)
Clerical	\$51.79 (\$24.66 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2014, “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 standard are both labor costs which are addressed elsewhere in this 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 monitor and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost <sup>7</sup> (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M <sup>8</sup> , (E X F)
Bag leak detectors	\$291,111	0	\$0	\$66,667 <sup>1</sup>	18	\$1,200,000
Flow meters <sup>2</sup>	\$3,000	0	\$0	\$0	0	\$0
Continuous opacity monitors <sup>3</sup>	\$36,000	0	\$0	\$7,500	0	\$0
Temporary hoods <sup>4</sup>	\$21,650	107	\$2,320,000	\$0	0	0
HF testing <sup>5</sup>	\$0	0	\$0	\$11,000	8	\$88,000
Furnace testing <sup>6</sup>	\$0	0	\$0	\$14,706	34	\$500,000
Temperature monitors <sup>6</sup>	\$1,200	0	\$0	\$0	0	\$0
<b>TOTAL</b>			<b>\$2,320,000</b>			<b>\$1,790,000</b>

<sup>1</sup> Assume that 34 percent of major sources (or 18 respondents) will use bag leak detectors on fabric filters with an average cost to industry at \$291,111. The actual cost of the bag leak detectors depends on the number of probes on the unit, and O&M costs for bag leak detectors is approximately \$66,667.

- <sup>2</sup> All chlorine injection systems already have chlorine flow meters and the operation and maintenance costs are negligible.
- <sup>3</sup> Sources with fabric filters will be complying with the monitoring requirements through the use of a bag leak detector or visible emissions observations and not continuous opacity monitors.
- <sup>4</sup> As a result of the 2015 final amendment, an estimated 107 furnaces and 27 facilities would need temporary hoods installed every 5 years and testing conducted for a total capital cost of \$17.3 million and a total annualized capital cost of \$2.3 million. Total annualized cost per furnace would average \$21,650 per year.
- <sup>5</sup> As a result of the 2015 final amendment requirement to measure hydrogen fluoride (HF) emissions, 8 affected facilities would incur a total annual O&M cost of \$11,000.
- <sup>6</sup> The 2015 final amendments allow owners/operators to switch furnace classifications, which would result in total annual O&M costs for testing of \$500,000/yr or, for an estimated 50 furnaces, a cost of \$10,000 per furnace, or \$14,706/yr per facility at 34 facilities.
- <sup>7</sup> Temperature monitors will be installed at new sweat furnaces at a cost of \$1,200. The O&M costs for temperature monitors are negligible.
- <sup>8</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are \$2,320,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$1,790,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$4,110,000. These are recordkeeping costs.

### **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 \$79,800.

This cost is based on the average hourly labor rate as follows:

Managerial	\$62.90 (GS-13, Step 5, \$39.31 + 60%)
Technical	\$46.67 (GS-12, Step 1, \$29.17 + 60%)
Clerical	\$25.25 (GS-6, Step 3, \$15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2014 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for

## Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 161 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 161 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR.

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(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	161	0	0	161
2	0	161	0	0	161
3	0	161	0	0	161
Average	0	161	0	0	161

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 161.

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
(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	0	1	0	070
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0

<b>Total Annual Responses</b>				
Notification of special compliance requirements	0	1	0	0
Notification of performance test	0	1	0	0
Notification of compliance status	53	1	0	53
Waiver application	0	1	0	0
Semiannual reports	161	2	0	323
Changing furnace classification	50	1	0	50
			Total	426

The number of Total Annual Responses is ~~3764~~296.

The total annual labor costs are \$1,270,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal).

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

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2 below, respectively, and summarized below.

##### **(i) Respondent Tally**

The total annual labor hours are 12,600. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 30 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$4,110,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

##### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 1,750 labor hours at a cost of \$79,800. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

### **6(f) Reasons for Change in Burden**

There is a decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This decrease is primarily a result of updating the number of sources. A recent industry analysis conducted during development of the 2015 final rule indicates a substantial decrease in both the number of major and area source facilities subject to the rule from the estimates used in the previous ICR renewal.

Note this ICR merges the burden from EPA ICR Number 2453.01, the ICR for the 2015 final rule. Therefore, this ICR reflects additional burden items not present in the previous renewal. In addition, this ICR revises bag leak detector costs per comments received from The Aluminum Association. These changes result in an overall increase in the capital and O&M costs.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 30 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; 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; 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; search data sources; complete and review the collection of information; and 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 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-2012-0505. 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 Ave., 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) 566-1927. 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-2012-0505 and OMB Control Number 2060-0433 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 Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal)**

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence <sup>e</sup>	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Cost Per year <sup>b</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Acquisition, installation, and utilization of technology and systems <sup>c</sup>	54	1	54	0	0	0	0	\$0
4. Reporting requirements								
a. Read and understand rule requirements <sup>d</sup>	1	1	1	161	161	8.05	16.1	\$18,618.93
b. Required activities								
Initial performance test <sup>e, f</sup>	24	1	24	0	0	0	0	\$0
Repeat performance test <sup>e, f</sup>	24	0.2	4.8	0	0	0	0	\$0
Operating, maintenance and monitoring plan <sup>e, f</sup>	32	1	32	0	0	0	0	\$0
Startup, shutdown, malfunction (SSM) plan <sup>g</sup>	N/A							
c. Create information	See 4B							
d. Gather existing information	See 4B							
e. Write report								
Notification of applicability <sup>e, f</sup>	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction	N/A							
Notification/report of actual startup	N/A							
Notification of special compliance requirements	N/A							
Notification of performance test <sup>e</sup>	2	1	2	0	0	0	0	\$0

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence <sup>e</sup>	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Cost Per year <sup>b</sup>
<sup>e</sup> Notification of compliance status	4	1	4	53	212	10.6	21.2	\$24,516.85
Waiver application <sup>h</sup>	2	1	2	0	0	0	0	\$0
Report of performance test	See 4B							
Semiannual reports <sup>i</sup>	8	2	16	161	2,576	128.8	257.6	\$297,902.81
Changing furnace classification <sup>j</sup>	2	1	2	50	100	5	10	\$11,564.55
SSM report <sup>g</sup>	N/A							
<b>Subtotal for Reporting Requirements</b>					<b>3,506</b>			<b>\$352,603</b>
5. Recordkeeping requirements								
a. Read and understand rule requirements	4	1	4	53	212	10.6	21.2	\$24,516.85
b. Plan activities	See 4E							
c. Implement activities	See 4B							
Verify lime injection rate	0.1	36	3.6	161	579.6	28.98	57.96	\$67,028.13
Changing furnace classification <sup>j</sup>	2	1	2	50	100	5	10	\$11,564.55
d. Develop record system	N/A							
e. Time to enter/transmit information								
Records of all information required by the standards	N/A							
Major sources <sup>k</sup>	1.5	52	78	53	4,134	206.7	413.4	\$478,078.50
Area sources <sup>l</sup>	0.5	52	26	108	2,808	140.4	280.8	\$324,732.56
f. Time to train personnel <sup>m</sup>	4	1	4	0	0	0	0	\$0.00
g. Time to adjust existing ways to comply with previous applicable requirements	N/A							

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence <sup>e</sup>	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Cost Per year <sup>b</sup>
h. Time to disclose information								
New sources <sup>n</sup>	0.25	2	0.5	0	0	0	0	\$0.00
All sources <sup>o</sup>	0.25	2	0.5	161	81	4.03	8.05	\$9,309.46
Sources that changed furnace classification <sup>j</sup>	1	1	1	50	50	2.5	5	\$5,782.28
i. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>					<b>9,101</b>		<b>\$915,230</b>	
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>p</sup></b>					<b>12,600</b>		<b>\$1,270,000</b>	
<b>Total Capital/O&amp;M Costs (rounded)<sup>p</sup></b>							<b>\$4,110,000</b>	
<b>Grand Total (Labor and Capital/O&amp;M Costs)(rounded)<sup>p</sup></b>							<b>\$5,380,000</b>	

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 161, of which 53 are major sources. There will be no additional new major or area sources over the three-year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$129.93 per hour for Executive, Administrative, and Managerial labor; \$103.97 per hour for Technical labor, and \$51.79 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2014 “Table 2. Civilian Workers, by Occupational and Industry Group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed that it will take each new respondent 54 hours to complete the task. This burden cost is associated with the monitoring of all control equipment ensuring that respondents of new respondents meet the required specifications of this subpart.

<sup>d</sup> We have assumed that it will take each respondent one hour to read and understand the rule requirements.

<sup>e</sup> We have assumed that all existing sources are in compliance with the initial rule requirements. It is further assumed that new area sources will comply by meeting the equipment specifications rather than by conducting performance tests. Respondents that are major sources are required to demonstrate initial compliance with the applicable emission limit, equipment, work practice, or operational standard for affected source or emission unit and report results in the

notification of compliance status report.

<sup>f</sup> Since we have assumed that there will be no new sources over the next three-year period of this ICR, there will be no new sources conducting initial performance tests. We have determined that respondents of new area sources will not be required to conduct emissions testing to show compliance with the emission limit, since it was determined that sweat furnaces sold in the United States now have an afterburner installed and meet the design residence time of 0.8 seconds or greater and an operating temperature of 1600 °F or greater. All new respondents are required to submit for approval an operation, maintenance and monitoring plan for affected sources.

<sup>g</sup> This burden item is no longer required as a result of the 2015 final amendment.

<sup>h</sup> It is assumed that there will be no new sources requiring a waiver from the performance test requirements.

<sup>i</sup> It is assumed that each respondent will take 8 hours to write semiannual report of excess emissions or no excess emissions.

<sup>j</sup> An estimated 50 facilities would change furnace classifications once per year.

<sup>k</sup> It is assumed that it will take 1.5 hours for major source respondents to enter and transmit records.

<sup>l</sup> It is assumed that it will take 0.5 hours for existing area source respondents to enter and transmit records.

<sup>m</sup> We have assumed that it will take 4 hours to train new employees.

<sup>n</sup> We have assumed that it will take 0.25 hours to each new respondent to disclose information.

<sup>o</sup> We have assumed that it will take 0.25 hours for each respondent to disclose information.

<sup>p</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR Part 63, Subpart RRR) (Renewal)**

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ <sup>b</sup>
Initial performance tests	40	1.4	56	0	0	0	0	\$0
Report performance test including retesting <sup>c</sup>	48	1	48	0	0	0	0	\$0
Notification of applicability	0.5	1	0.5	0	0	0	0	\$0
Notification of construction/reconstruction	N/A							
Notification of actual startup	N/A							
Notification of special compliance requirements	N/A							
Notification of performance test	2	1	2	0	0	0	0	\$0
Notification of compliance status <sup>d</sup>	2	1	2	0	0	0	0	\$0
Report of performance test <sup>c</sup>	40	1	40	0	0	0	0	\$0
Repeat of performance test report <sup>c</sup>	40	1	40	0	0	0	0	\$0
Semiannual reports <sup>e</sup>	4	2	8	161	1288	64.4	128.8	\$67,413.92
Startup, shutdown, malfunction report <sup>f</sup>	N/A							
Review performance test reports and reports from facilities changing furnace classification <sup>g</sup>	4	1	4	59	236	11.8	23.6	\$12,352.24
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>h</sup></b>					<b>1,750</b>			<b>\$79,800</b>

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 161, of which 53 are major sources. There will be no additional new major or area sources over the three-year period of this ICR.
- <sup>b</sup> This cost is based on the following hourly labor rates: \$62.90 for Managerial (GS-13, Step 5, \$39.31 + 60%), \$46.67 for Technical (GS-12, Step 1, \$29.17 + 60%) and \$25.25 Clerical (GS-6, Step 3, \$15.78 + 60%). These rates are from the Office of Personnel Management (OPM) "2014 General Schedule" which excludes locality rates of pay. The rates have been increased by 60% to account for the benefit packages available to government employees.
- <sup>c</sup> We have assumed that all existing respondent are in compliance with the initial rule requirements. It is further assumed that new sweat furnaces will comply by meeting the equipment specification than by conducting performance test.
- <sup>d</sup> We have assumed that it will take 2 hours for each respondent to complete notification of compliance status.
- <sup>e</sup> We have assumed that each existing respondent will take 4 hours two times per year to complete the semiannual reports.
- <sup>f</sup> This burden item is no longer required as a result of the 2015 final amendment.
- <sup>g</sup> Assumes Agency will review all annual reports, including 4 HF tests/yr, 5 tests/yr for uncontrolled furnaces and 50 reports/yr for changing furnace classification.
- <sup>h</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.