

ICR Summary Information

Hours Per Response	29
Number of Respondents	164
Total Estimated Burden Hours	13,000
Total Estimated Costs	\$5,160,000
Annualized Capital O&M	\$4,650,000
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost - NESHAP for Secondary Aluminum Production (40 CFR Part 63, §

Burden Item	(A)	(B)
	Person-hours per occurrence	No. of occurrences per respondent per year
1. Applications	N/A	
2. Surveys and studies	N/A	
3. Acquisition, installation, and utilization of technology and systems ^c	54	1
4. Reporting requirements		
a. Familiarization with Regulatory Requirements ^d	1	1
b. Required activities		
Initial performance test ^{e, f}	24	1
Repeat performance test ^{e, f}	24	0.2
Operating, maintenance and monitoring plan ^{e, f}	32	1
Startup, shutdown, malfunction (SSM) plan	N/A	
c. Create information	See 4B	
d. Gather existing information	See 4B	
e. Write report		
Notification of applicability ^{e, f}	2	1
Notification of construction/reconstruction	N/A	
Notification/report of actual startup	N/A	
Notification of special compliance requirements	N/A	
Notification of performance test ^e	2	1
Notification of compliance status ^e	4	1
Waiver application ^g	2	1
Report of performance test	See 4B	
Semiannual reports ^h	8	2
Changing furnace classification ⁱ	2	1
Subtotal for Reporting Requirements		
5. Recordkeeping requirements		
a. Familiarization with Regulatory Requirements	See 4A	
b. Plan activities	See 4E	
c. Implement activities	See 4B	
Verify lime injection rate	0.1	36
Changing furnace classification ⁱ	2	1
d. Develop record system	N/A	
e. Time to enter/transmit information		
Records of all information required by the standards	N/A	
Major sources ^j	1.5	52
Area sources ^k	0.5	52
f. Time to train personnel ^l	4	1
g. Time to adjust existing ways to comply with previous applicable requirements	N/A	
h. Time to disclose information		

New sources ^m	0.25	2
All sources ⁿ	0.25	2
Sources that changed furnace classification ⁱ	1	1
i. Time for audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST (rounded) ^o		
TOTAL CAPITAL AND O&M COSTS (rounded) ^o		
GRAND TOTAL (rounded) ^o		

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to this rule will be 164, of which 56 are major
- ^b This ICR uses the following labor rates: Managerial \$172.41 (\$82.10+ 110%); Technical \$141.75 (\$67.50 + 110%); and Clerk Statistics, December 2023, “Table 2. Civilian workers by occupational and industry group.” The rates are from column 1, “Total additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with the worker’s job.”
- ^c We have assumed that it will take each new respondent 54 hours to complete the task. This burden cost is associated with the specifications of this subpart. No additional new major or areas sources are anticipated over the three-year period of this ICR
- ^d We have assumed that it will take each respondent one hour to read and understand the reporting requirements.
- ^e It is assumed that new area sources will comply by meeting the equipment specifications rather than by conducting performance tests. Applicable emission limit, equipment, work practice, or operational standard for affected source or emission unit and report requirements.
- ^f We have assumed new major sources will conduct initial performance tests. We have determined that respondents of new area sources since it was determined that sweat furnaces sold in the United States now have an afterburner installed and meet the design requirements are required to submit for approval an operation, maintenance and monitoring plan for affected sources.
- ^g It is assumed that there will be no new sources requiring a waiver from the performance test requirements.
- ^h It is assumed that each respondent will take 8 hours to write semiannual report of excess emissions or no excess emissions.
- ⁱ An estimated 51 facilities would change furnace classifications once per year.
- ^j It is assumed that it will take 1.5 hours for major source respondents to enter and transmit records.
- ^k It is assumed that it will take 0.5 hours for existing area source respondents to enter and transmit records.
- ^l We have assumed that it will take 4 hours to train new employees.
- ^m We have assumed that it will take 0.25 hours to each new respondent to disclose information.
- ⁿ We have assumed that it will take 0.25 hours for each respondent to disclose information.
- ^oTotals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Subpart RRR) (Renewal)

(C)	(D)	(E)	(F)	(G)	(H)
Person- hours per respondent per year (C=AxB)	Respondents per year ^a	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost (\$) ^b
54	1.3	72.0	3.6	7.2	\$11,340.47
1	164	163.7	8.2	16.4	\$25,778.04
24	1.3	32.0	1.6	3.2	\$5,040.21
4.8	1.3	6.4	0.3	0.6	\$1,008.04
32	1.3	42.7	2.1	4.3	\$6,720.28
2	1.3	3	0.13	0.27	\$420.02
2	1.3	3	0.13	0.27	\$420.02
4	56	224.0	11.2	22.4	\$35,281.46
2	0	0	0	0	\$0.00
16	164	2,619	131	262	\$412,448.62
2	51	101.9	5.1	10.2	\$16,044.14
		3,757			\$514,501
3.6	164	589	29.5	58.9	\$92,800.94
2	51	102	5.1	10.2	\$16,044.14
78	56	4,368	218.4	436.8	\$687,988.39
26	108	2,808	140.4	280.8	\$442,278.25
4	1.3	5	0.3	0.5	\$840.03

0.5	1.3	1	0.03	0.07	\$105.00
0.5	164	82	4.09	8.18	\$12,889.02
1	51	51	2.55	5.09	\$8,022.07
		9,207			\$1,252,946
		13,000			\$510,000
					\$4,650,000
					\$5,160,000

r sources. There will be approximately 1.3 new sources per year over the three-year period of this ICR.

erical \$71.36 (\$33.98 + 110%). These rates are from the United States Department of Labor, Bureau of Labor
 tal compensation.” The rates are increased by 110 percent to account for varying industry wage rates and the
 iated with hiring, training, and equipping their employees.

he monitoring of all control equipment ensuring that respondents of new respondents meet the required

nce tests. Respondents that are major sources are required to demonstrate initial compliance with the
 sults in the notification of compliance status report.

rea sources will not be required to conduct emissions testing to show compliance with the emission limit,
 sidence time of 0.8 seconds or greater and an operating temperature of 1600 °F or greater. All new

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

Responses	Hr/Response
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441

29

Table 2: Average Annual EPA Burden and Cost – NESHAP for Secondary Aluminum Production (40 CFR

Activity	(A)	(B)	(C)	(D)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant-year (C=AxB)	Plants per year ^a
Initial performance tests	40	1.4	56	1.3
Report performance test including retesting ^c	48	1	48	1.3
Notification of applicability	0.5	1	0.5	1.3
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	1.3
Notification of compliance status ^d	2	1	2	56
Report of performance test ^c	40	1	40	1.3
Repeat of performance test report ^c	40	1	40	1.3
Semiannual reports ^e	4	2	8	164
Review performance test reports and reports from facilities changing furnace classification ^f	4	1	4	60
TOTAL (rounded) ⁱ				

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be 164, of which 56 per year over the three-year period of this ICR.

^b This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%); \$30.88 (GS-6, Step 3, \$19.30+ 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, as from the Office of Personnel Management (OPM), 2024 General Schedule, which excludes locality, rates of pay. T benefit packages available to government employees.

^c We have assumed that all existing respondents are in compliance with the initial rule requirements.

^d We have assumed that it will take 2 hours for each respondent to complete notification of compliance status.

^e We have assumed that each existing respondent will take 4 hours two times per year to complete the semiannual reports.

^f Assumes Agency will review all annual reports, including 4 HF tests/yr, 5 tests/yr for uncontrolled furnaces, and 10 tests/yr for controlled furnaces.

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

^h Assumes that 10 percent of plants per year ($0.1 \times 6 = 0.6$, rounded to 1) will report a malfunction incident.

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

Part 63, Subpart RRR) (Renewal)

(E)	(F)	(G)	(H)
Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost (\$) ^b
75	3.73	7.47	\$4,779
64	3.2	6.4	\$4,096
0.67	0.03	0.07	\$43
2.66	0.13	0.27	\$170
112	5.6	11.2	\$7,169
53	2.67	5.33	\$3,414
53	2.67	5.33	\$3,414
1,309	65	131	\$83,803
240	12	24	\$15,361
2,200			\$122,000

Labor Rates	
Managerial	\$76.91
Technical	\$57.07
Clerical	\$30.88

5 are major sources. There will be approximately 1.3 new sources

; Technical \$57.07 (GS-12, Step 1, \$35.67 + 60%); and Clerical and Clerical hours are 10 percent of Technical hours. These rates are the rates have been increased by 60 percent to account for the

reports.

51 reports/yr for changing furnace classification.

Capital/Startup vs. Operation and Maintenance (
(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)
Bag leak detectors ^a	\$291,111	1.3	\$387,178
Flow Meters ^b	\$3,000	1.3	\$3,990
Continuous opacity monitors ^c	\$36,000	0	\$0
Temporary hoods ^d	\$21,650	109	\$2,359,716
HF testing ^e	\$11,000	1.3	\$14,630
Furnace testing ^f	\$10,000	1.3	\$13,300
Temperature monitors ^g	\$1,200	1.3	\$1,596
Totals (rounded) ^h			\$2,780,000

Assumptions:

^a Assume that 34 percent of major sources (or 19 respondents) will use bag leak detectors on fabric filters with a leak detectors depends on the number of probes on the unit, and O&M costs for bag leak detectors is approximat

^b The operation and maintenance costs of chlorine flow meters are negligible.

^c Sources with fabric filters will be complying with the monitoring requirements through the use of a bag leak de opacity monitors.

^d An estimated 109 furnaces and 28 facilities would need temporary hoods installed every 5 years and testing co \$21,650 per year.

^e An estimated 8 affected facilities would incur a total annual O&M cost of \$11,000 for measurement of hydroge

^f Switching furnace classifications would result in total annual O&M costs for testing of \$500,000/yr or, for an e

^g Temperature monitors will be installed at new sweat furnaces at a cost of \$1,200. The O&M costs for temperat

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

O&M) Costs			
(E)	(F)	(G)	
Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E x F)	
\$66,667	19	\$1,266,673	
\$0	0	\$0	
\$7,500	0	\$0	
\$0	0	\$0	
\$11,000	8	\$89,640	
\$10,000	51	\$509,317	
\$0	0	\$0	
		\$1,870,000	
			Totals
			\$4,650,000

n average cost to industry at \$291,111. The actual cost of the bag tely \$66,667.

ector or visible emissions observations and not continuous

nducted. Total annualized cost per furnace would average

en fluoride (HF) emissions.

estimated 51 furnaces, a cost of \$10,000 per furnace.

ure monitors are negligible.

Number of Respondents			
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports
	(A)	(B)	(C)
Year	Number of New Respondents ¹	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports
1	1.3	161.0	0
2	1.3	162.3	0
3	1.3	163.7	0
Average	1.3	162.3	0

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

nts

(D)	(E)
Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
0	162
0	164
0	165
0	164

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(B \times C)+D$
Notification of applicability	1.3	1	0	1.33
Notification of construction/reconstruction	1.3	1	0	1.33
Notification of actual startup	1.3	1	0	1.33
Notification of special compliance requirements	1.3	1	0	1.33
Notification of performance test	1.3	1	0	1.33
Notification of compliance status	56	1	0	56
Waiver application	0	1	0	0
Semiannual reports	164	2	0	327
Changing furnace classification	51	1	0	51
		Total (rounded)		441