PART A OF THE SUPPORTING STATEMENT

1.0 Identification of the Information Collection

(a) Title and Number of the Information Collection.

"Reporting and Recordkeeping Requirements for the Primary Copper Smelter NESHAP." This is a revision of EPA ICR 1850.2 incorporating changes to the burden estimates that have been made to address OMB comments and public comments on the ICR for the proposed rule and subsequent supplemental proposal.

(b) Short Characterization.

Respondent who will be required to perform this information collection are the owners or operators of facilities that are subject to the national emission standards for hazardous air pollutants (NESHAP) for primary copper smelters that the EPA is promulgating under authority of Clean Air Act section 112.

Up to six existing primary copper smelters in the United States could be subject to the final rule, but the actual number of smelters subject to the rule likely will be less because of changes in the copper industry during the last several years. Corporate mergers have consolidated ownership of the six smelters to three international copper companies. Four of the six smelters have suspended operations and currently are not producing copper. At this time, it is unknown when and even if these three smelters will resume production.

Affected smelter owners and operators subject to the rule will be required to install and operate air emission controls and meet certain work practice standards. To demonstrate initial and continuous compliance with the rule requirements, affected owners and operator will need to collect information to meet specific monitoring, inspection, recordkeeping, and reporting requirements in the final rule.

The information collection requirements for the primary

copper smelter NESHAP are summarized in Attachment 1. Each respondent will be required to submit to the EPA a one-time notification of applicability of the respondent's smelter to the proposed NESHAP. The respondents will be required to perform an annual performance test for each control device used to comply with the standards and submit to the EPA a report following the test. Between performance tests, the respondents will be required to monitor selected operating parameters indicative of the control device performance and to maintain records of the monitoring results. Semiannually, the respondent will be required to prepare and submit to the EPA a summary report describing any periods of control device operation during which the monitored values of the control device operating parameters exceed the boundaries established during the initial performance test.

Respondents subject to the final rule also will be required to prepare two site-specific written operating plans for the air pollution control equipment used to comply with the rule; (1) a startup, shutdown, and malfunction plan, and (2) a fugitive dust control plan. These plans will not require approval by the EPA but will be required to be maintained at the smelter site.

Records and reports will be required to be retained for a total of 5 years (2 years at the site; the remaining 3 years of records may be retained at an off-site location). The files can be maintained on microfilm, on computer or floppy disks, on magnetic tape disks, or on microfiche.

2. Need For and Use of the Collection

(a) Need/Authority for the Collection.

The EPA is required under section 112 of the Clean Air Act to establish NESHAP for control of HAP emissions from both new and existing sources determined to be major sources of HAP emissions. Primary copper smelters have been identified by EPA as

potentially significant emitters of metal HAP. Overall, the metal HAP constituents emitted in the largest quantities from primary copper smelters are arsenic compounds and lead compounds. Chronic exposure to arsenic is associated with human cancers of the skin, bladder, liver and lungs and can cause other developmental and reproductive effects. Exposure to lead compounds results in adverse effects on the blood, central nervous system, and kidneys.

To implement and enforce this NESHAP, certain types of information are needed by the EPA to: (1) confirm the compliance status of major sources, identify any non-major sources not subject to the standards, and identify new or reconstructed sources subject to the standards; and (2) ensure that the standards are being achieved. These recordkeeping and reporting requirements are specifically authorized by section 114 of the Act (42 U.S.C. 7414) and are codified in the NESHAP General Provisions (40 CFR Part 63, Subpart A).

(b) Practical Utility/Users of the Data.

The information will be used by Agency personnel to: (1) identify major sources and new or reconstructed sources subject to the standards, (2) ensure that MACT is being properly applied;(3) ensure that the emission control devices are being properly operated and maintained on a continuous basis; (4) identify those facilities that should be inspected; (5) identify those facilities that may benefit from compliance assistance activities; and (6) to ensure that the emission control devices are being properly operated and maintained on a continuous basis to reduce HAP emissions.

To minimize the burden, much of the information the EPA needs to determine compliance will be recorded and retained on-site at the facility. Such information will be reviewed by the enforcement personnel during an inspection and will not need to

be routinely reported to the EPA. Except for cases in which a violation has occurred, information required in reports has been limited to the extent practical.

3. The Respondents and the Information Requested

(a) Respondents/SIC Codes.

Potential respondents are owners or operators of primary copper smelters that produce anode copper using flash smelting furnaces integrated with batch copper converters. A total of six existing primary copper smelters in three States (Arizona, New Mexico, and Texas) use this copper production technology. The final NESHAP requires that the primary copper smelter be a major source of HAP emissions, as defined in 40 CFR 63.2. The final rule does not apply to a primary copper smelter that is not a major source. Based on current information available to the EPA, it is anticipated that at least two of the existing smelters may not be major HAP sources and thus not subject to this final rule because these smelters process copper ores with naturally occurring low concentrations of the metal impurities listed as HAP. Furthermore, three of the six smelters have suspended operations and currently are not producing copper because of a combination of factors including corporate mergers and economic considerations. At this time, it is unknown when and even if these three smelters will resume production. Thus, it is likely fewer than the six primary copper smelters will be subject to the primary copper smelter NESHAP. However, to prepare these burden and cost estimates it is assumed that all six primary copper smelters will be subject to the rule and will need to comply with the monitoring, recordkeeping, and reporting requirements in the rule. The North American Industry Classification System Code for the respondents to the rule is code 331411 - "Primary Smelting and Refining of Copper."

(b) Information Requested.

(i) Data items, Including Recordkeeping Requirements. Attachment 1 summarizes the proposed information collection requirements.

(ii) Respondent activities. The respondent activities required by the standards are identified in Tables 1 through 3 and introduced in Section 6(a).

4. The Information Collected--Agency Activities, Collection Methodology, and Information Management

(a) Agency Activities.

A list of Agency activities is provided in Tables 4 through 6 and introduced in Section 6(c).

(b) Collection Methodology and Management.

Information contained in the one-time only reports will be entered into the Compliance Data System operated and maintained by the EPA's Office of Enforcement and Compliance Assurance. Data obtained from records maintained by the respondents during site inspection visits by Agency personnel will be tabulated and published for internal EPA use in enforcement and compliance programs.

(c) Small Entity Flexibility.

None of the companies operating primary copper smelters in the United States are small entities. Thus, no small businesses will be subject to the proposed NESHAP or incur adverse economic impacts.

(d) Collection Schedule.

A schedule for collection of information and publication of data is not applicable because reports and recordkeeping are triggered by action of the respondents.

5. Nonduplication, Consultation, and Other Collection Criteria

(a) Nonduplication.

No similar information requests are being carried out by the Federal government. A search of the EPA's ongoing ICR's revealed no duplication of information-gathering efforts. Certain control device performance test reports that will be required by the proposed primary copper smelter NESHAP may duplicate information also required from a respondent by a State air regulatory agency. In such cases, a copy of the test report submitted by a respondent to the State agency could be provided to the EPA.

(b) Consultations.

Participants outside the EPA involved in the development of the primary copper smelter NESHAP included representatives of the three State air regulatory agencies in which the six primary copper smelters potentially subject to the rule are located (States of Arizona, New Mexico, and Texas) and representatives of the companies operating these primary copper smelters (ASARCO Incorporated a subsidiary of Groupo Mexico, S.A. de C.V., BHP Copper Corporation, and Phelps Dodge Corporation). The EPA consulted with these parties regarding the monitoring, reporting, and recordkeeping requirements during meetings and telephone conversations. No major problems regarding the monitoring, recordkeeping, or reporting procedures were encountered.

(c) Effects of Less Frequent Collection.

If the relevant information were collected at less frequent intervals, the EPA will not be reasonably assured that a smelter is in compliance with the standards.

(d) General Guidelines.

None of the general information collection guidelines, with one exception, in 5 CFR 1230.5(d)(2) of the OMB regulations implementing the Paperwork Reduction Act is being exceeded. The one exception is the rule requires the respondent maintain inspection and monitoring records for a minimum of 5 years. In

addition, the Agency has taken all practical steps to develop easy-to-understand requirements for all respondents.

(e) Confidentiality and Sensitive Questions.

(i) Confidentiality. All 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 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

(ii) Sensitive Questions. This section is not applicable because this ICR does not involve matters of a sensitive nature.

6. Estimating the Burden and Cost of the Collection

(a) Estimating Respondent Burden.

The annual burden estimates for reporting and recordkeeping are presented in Tables 1, 2 and 3. These numbers were derived from estimates based on the EPA's experience with implementing NESHAP for similar types of sources.

(b) Estimating Respondent Costs.

The information collection activities for sources subject to the standards are presented in Tables 1, 2, and 3. The capital costs and the operating and maintenance (O&M) costs were estimated by identifying the capital equipment each smelter will be expected to purchase and install the changes in the operating, maintenance, monitoring, and recordkeeping operations that will be expected to be implemented to comply with the reporting and recordkeeping requirements of rule. Capital costs are estimated for the purchase and installation of equipment to monitor and record control device operating parameters. For estimating the respondent burden and costs, the initial control device performance tests are assumed to be conducted during the first

year following promulgation of the rule since, with one exception, the air emission control equipment required under the rule is already installed at the six smelters potentially subject to the rule. Labor rates and associated costs are based on the Comprehensive Assessment and Information Rule (CAIR) economic analysis and estimated hourly rates are as follows: legal at $86, technical at $43, management at $49, and clerical at $15.

(c) Estimating Agency Burden and Cost.

Because the information collection requirements were developed as an incidental part of the development of the rule, no costs can be attributed to the development of the information collection requirements. Because reporting and recordkeeping requirements for the respondents are required under the General Provisions for the MACT standards, no operational costs will be incurred by the Federal Government. Publication and distribution of the information are part of the Compliance Data System, so that no Federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of sources that is part of the EPA's overall compliance and enforcement program, and, therefore, is not attributable to the ICR. The only costs that the Federal government will incur are user costs associated with the analysis of the reported information and for labor and travel for site visits to observe performance tests and conduct compliance inspections, estimates for these costs are presented in Tables 4, 5, and 6.

For the estimating the agency burden and costs, the initial performance tests are assumed to be conducted during the first year following promulgation of the rule since, with one exception, the air emission control equipment required under the rule is already installed at the six smelters. The assumed hourly rates are as follows: management at $54.53, technical at

$32.99, and clerical at $16.74. Total travel costs for the smelter site visits are estimated assuming travel costs on average are $200 per person per 8-hour day spent at the smelter site.

(d) Bottom Line Burden Hours and Costs/Master Tables.

(i) The simple collection. The bottom line respondent burden hours and costs for the first 3 years following promulgation are presented in Tables 1, 2, and 3. The total burden hours are calculated by adding the total labor-hours per year estimated for legal, technical, managerial, and clerical staff. The total annual costs are calculated by adding the total labor costs, annualized capital costs, and operating and maintenance (O&M) costs. The bottom line respondent burden hour and cost estimates for each of first 3 years following promulgation are summarized below.

Respondent Bottom Line Burden Hours and Costs

	Total Annual Burden Hours	*Total Annual Cost*
1st year	*24,314 hours*	*$1,170,000*
2nd year	*18,602 hours*	*$880,600*
3rd year	*18,602 hours*	*$880,600*
Average	*20,506 hours*	*$923,800*

Based on a total of six respondents nationwide, the 3-year average burden to the individual respondent is 3,420 hours per year at a cost of $154,000 per year.

(ii) The Agency tally. The bottom line Agency burden hours and costs for the first 3 years following promulgation are presented in Tables 4, 5, and 6. The total burden hours are calculated by adding the total labor-hours per year estimated for legal, technical, managerial, and clerical staff. The total

annual costs are calculated by adding the total labor costs, annualized capital costs, and operating and maintenance (O&M) costs. The bottom line Agency burden hour and cost estimates for each of first 3 years following promulgation are summarized below.

Agency Bottom Line Burden Hours and Costs

	Total Annual Person Hours	*Total Annual Cost*
1st year	*1,470 hours*	*$71,200*
2nd year	*300 hours*	*$17,600*
3rd year	*300 hours*	*$17,600*
Average	*690 hours*	*$35,500*

(iii) The complex collection. This section does not apply since this is a simple collection.

(iv) Variations in the annual bottom line. This section does not apply since no significant variation is anticipated.

(e) Reasons for Change in Burden.

The reporting and recordkeeping estimates presented in the third version of the ICR (EPA ICR No. 1850.03) have been revised to address the changes made to the final rule affecting the smelter owner or operator's recordkeeping and reporting requirements. For example, the estimates for the appropriate information collection activities related to performance testing have been adjusted to reflect the change to the final rule requiring annual performance testing of affected sources. In addition, we have reviewed all of the public comments we received on ICR No. 1850.01 and ICR No. 1850.02 and adjusted the estimates using the labor hour requirements recommended by the commenters. We revised our estimates of the amount of time needed to prepare plans required by the final rule based on information supplied by

the affected companies on the number of hour actually spent by staff in preparing similar type plans. Also, additional costs were added to the estimates for equipment and supplies to prepare and store the required records and reports.

Specific revisions to the estimates in EPA ICR No. 1850.03 include the following changes. Labor hours and costs for annual performance testing of affected sources as required by the final rule were included in the burden estimates for Years 1,2 and 3. Based on the information provided by the copper companies, we increased our estimate for Year 1 of the amount of time needed to prepare a startup, shutdown, and malfunction plan from 40 to 80 hours and to prepare a fugitive dust control plan from 40 to 100 hours.

PART B OF THE SUPPORTING STATEMENT

This section is not applicable the "Reporting and Recordkeeping Requirements for the Primary Copper Smelter" because statistical methods are not used in data collection associated with this regulation.

Attachment 1
Summary of Respondent Recordkeeping and Reporting Requirements

Requirement	***40 CFR 63 Subpart QQQ Citation***	***40 CFR part 63 General Provisions Citation***	***Retention Time***
Notifications and Reports			
Initial notification	*§63.1454(a)*	*§63.9(b)*	
Notification of performance tests	*§63.1454(a)*	*§63.7, §63.9(e)*	
Notification of compliance status	*§63.1454(a)*	*§63.9(h)*	
Performance test reports	*§63.1454(a)*	*§63.10(d)*	
Semi-annual summary reports	*§63.1454(b)*	*§63.10(e)*	
Recordkeeping			
Records of process startup, shutdown, and malfunctions	*§63.1454(c)*	*§63.10(b)(2)*	*5 years*
Records of air pollution control equipment maintenance, malfunctions, and corrective actions	*§63.1454(c)*	*§63.10(b)(2)*	*5 years*
Records of performance tests and other supporting documentation used to demonstrate compliance with relevant standards under the rule	*§63.1454(c)*	*§63.10(b)(2)*	*5 years*
Records of monthly capture system visual inspection	*§63.1454(c)*	*§63.10(b)(2)*	*5 years*
Records of converter capture system operating parameter monitoring system performance, calibration, and maintenance	*§63.1454(c)*	*§63.10(b)(2)*	*5 years*

(continued)

Attachment 1 (concluded)

Requirement	***40 CFR 63 Subpart QQQ Citation***	***40 CFR part 63 General Provisions Citation***	***Retention Time***
Recordkeeping *(continued)*			
Records of control device operating parameter monitoring system performance, calibration, and maintenance	*§63.1454(c)*	*§63.10(b)(2)*	*5 years*
Records of control device or converter capture system operating parameter deviations	*§63.1454(c)*	*§63.10(b)(2)*	*5 years*
Copy of site-specific air pollution equipment startup, shutdown, and malfunction plan	*§63.1450(c)*	*§63.6(e)(3)*	*period plan remains in effect*
Copy of site-specific smelter fugitive dust control plan	*§63.1448(a)*		*period plan remains in effect*

Table 1. FIRST YEAR RESPONDENT BURDEN HOURS AND COSTS

Information Collection Activities	A Labor Hours per Activity per Labor Category				B Activities per Respondent per Year	C Total Number of Respondents	D Total Hours per Year	E Labor Costs per Labor Category per Year (AxBxCxRate)				F Total Labor Costs per Year	G Annualized Start-up/ Capital Costs	H Annual O&M Costs	I Total Costs per year (F+G+H)
	Legal	Managerial	Technical	Clerical				Legal	Managerial	Technical	Clerical				
1. Applications	Not applicable to this rulemaking														
2. Surveys and studies	Not applicable to this rulemaking														
3. Acquisition, installation, and use of technology and systems															
a. Control device operating parameter monitoring system	0	8	100	0	3.5	6	2,268	$0	$11,088	$90,300	$0	$101,388	$16,800	$64,800	$182,988
b. Converter hood system parameter monitoring system	0	8	100	0	1	6	648	$0	$3,168	$25,800	$0	$28,968	$9,200	$7,200	$45,368
4. Reporting requirements															
a. Read instructions	8	8	16	0	1	6	192	$4,128	$3,168	$4,128	$0	$11,424	$0	$0	$11,424
b. Required activities															
c. Create information															
i. Conduct control device performance test	0	16	120	0	4.5	6	3,672	$0	$28,512	$139,320	$0	$167,832	$0	$0	$167,832
ii. Conduct converter building performance test	0	16	240	0	1	6	1,536	$0	$6,336	$61,920	$0	$68,256	$0	$0	$68,256
d. Gather existing information															
e. Write reports															
i. Initial notification	0	8	0	2	1	6	60	$0	$3,168	$0	$192	$3,360	$0	$0	$3,360
ii. Performance test notification	0	2	0	1	5.5	6	99	$0	$4,356	$0	$528	$4,884	$0	$0	$4,884
iii. Initial compliance determination	0	8	40	8	1	6	336	$0	$3,168	$10,320	$768	$14,256	$0	$0	$14,256
iv. Performance test reports	0	8	80	16	5.5	6	3,432	$0	$17,424	$113,520	$8,448	$139,392	$0	$0	$139,392
v. Summary report	0	4	40	8	2	6	624	$0	$3,168	$20,640	$1,536	$25,344	$0	$0	$25,344
5. Recordkeeping Requirements															
a. Read instructions	8	8	40	0	1	6	336	$4,128	$3,168	$10,320	$0	$17,616	$0	$0	$17,616
b. Plan activities	0	8	100	0	1	6	648	$0	$3,168	$25,800	$0	$28,968	$0	$0	$28,968
c. Implement activities															
i. Prepare startup/shutdown/ malfunction plan	8	16	80	8	1	6	672	$4,128	$6,336	$20,640	$768	$31,872	$0	$0	$31,872
ii. Copper concentrate dryer															
Monitor control device parameters	0	0	0.5	0	365	6	1,095	$0	$0	$47,085	$0	$47,085	$0	$0	$47,085
iii. Smelting vessel															
Inspect tapping hood system	0	0	4	0	12	6	288	$0	$0	$12,384	$0	$12,384	$0	$0	$12,384
Monitor control device parameters	0	0	0.5	0	365	6	1,095	$0	$0	$47,085	$0	$47,085	$0	$0	$47,085
iv. Slag cleaning vessel															
Inspect tapping hood system	0	0	4	0	12	2	96	$0	$0	$4,128	$0	$4,128	$0	$0	$4,128
Monitor control device parameters	0	0	0.5	0	365	2	365	$0	$0	$15,695	$0	$15,695	$0	$0	$15,695
v. Batch copper converters															
Inspect converter hood system	0	0	4	0	12	6	288	$0	$0	$12,384	$0	$12,384	$0	$0	$12,384
Monitor hood system ventilation parameters	0	0	0.5	0	365	6	1,095	$0	$0	$47,085	$0	$47,085	$0	$0	$47,085
Monitor control device parameters	0	0	0.5	0	365	6	1,095	$0	$0	$47,085	$0	$47,085	$0	$0	$47,085
vi. Prepare fugitive dust control plan	8	16	100	8	1	6	792	$4,128	$6,336	$25,800	$768	$37,032	$0	$0	$37,032
d. Develop record system	0	16	100	0	1	6	696	$0	$6,336	$25,800	$0	$32,136	$0	$0	$32,136
e. Time to enter information	0	0	1	0	365	6	2,190	$0	$0	$94,170	$0	$94,170	$0	$0	$94,170
f. Time to train personnel	0	16	100	0	1	6	696	$0	$6,336	$25,800	$0	$32,136	$0	$0	$32,136
TOTAL							24,314					$1,071,965	$26,000	$72,000	$1,169,965

Table 2. SECOND YEAR RESPONDENT BURDEN HOURS AND COSTS

Information Collection Activities	A Labor Hours per Activity per Labor Category				B Activities per Respondent per Year	C Total Number of Respondents	D Total Hours per Year	E Labor Costs per Labor Category per Year (AxBxCxRate)				F Total Labor Costs per Year	G Annualized Start-up/ Capital Costs	H Annual O&M Costs	I Total Costs per year (F+G+H)
	Legal	Managerial	Technical	Clerical				Legal	Managerial	Technical	Clerical				
1. Applications	Not applicable to this rulemaking														
2. Surveys and studies	Not applicable to this rulemaking														
3. Acquisition, installation, and use of technology and systems															
a. Control device operating parameter monitoring system	0	8	100	0	0	6	0	$0	$0	$0	$0	$0	$16,800	$64,800	$81,600
b. Converter hood system parameter monitoring system	0	8	100	0	0	6	0	$0	$0	$0	$0	$0	$9,200	$7,200	$16,400
4. Reporting requirements															
a. Read instructions	8	8	16	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
b. Required activities															
c. Create information															
i. Conduct control device performance test	0	16	120	0	4.5	6	3,672	$0	$28,512	$139,320	$0	$167,832	$0	$0	$167,832
ii. Conduct converter building performance test	0	16	240	0	1	6	1,536	$0	$6,336	$61,920	$0	$68,256	$0	$0	$68,256
d. Gather existing information															
e. Write reports															
i. Initial notification	0	8	0	2	1	6	60	$0	$3,168	$0	$192	$3,360	$0	$0	$3,360
ii. Performance test notification	0	2	0	1	5.5	6	99	$0	$4,356	$0	$528	$4,884	$0	$0	$4,884
iii. Initial compliance determination	0	8	40	8	1	6	336	$0	$3,168	$10,320	$768	$14,256	$0	$0	$14,256
iv. Performance test reports	0	8	80	16	5.5	6	3,432	$0	$17,424	$113,520	$8,448	$139,392	$0	$0	$139,392
v. Summary report	0	4	40	8	2	6	624	$0	$3,168	$20,640	$1,536	$25,344	$0	$0	$25,344
5. Recordkeeping Requirements															
a. Read instructions	8	8	40	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
b. Plan activities	0	8	100	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
c. Implement activities															
i. Prepare startup/shutdown/ malfunction plan	8	16	80	8	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
ii. Copper concentrate dryer															
Monitor control device parameters	0	0	0.5	0	365	6	1,095	$0	$0	$47,085	$0	$47,085	$0	$0	$47,085
iii. Smelting vessel															
Inspect tapping hood system	0	0	4	0	12	6	288	$0	$0	$12,384	$0	$12,384	$0	$0	$12,384
Monitor control device parameters	0	0	0.5	0	365	6	1,095	$0	$0	$47,085	$0	$47,085	$0	$0	$47,085
iv. Slag cleaning vessel															
Inspect tapping hood system	0	0	4	0	12	2	96	$0	$0	$4,128	$0	$4,128	$0	$0	$4,128
Monitor control device parameters	0	0	0.5	0	365	2	365	$0	$0	$15,695	$0	$15,695	$0	$0	$15,695
v. Batch copper converters															
Inspect converter hood system	0	0	4	0	12	6	288	$0	$0	$12,384	$0	$12,384	$0	$0	$12,384
Monitor hood system ventilation parameters	0	0	0.5	0	365	6	1,095	$0	$0	$47,085	$0	$47,085	$0	$0	$47,085
Monitor control device parameters	0	0	0.5	0	365	6	1,095	$0	$0	$47,085	$0	$47,085	$0	$0	$47,085
vi. Prepare fugitive dust control plan	8	16	100	8	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
d. Develop record system	0	16	100	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
e. Time to enter information	0	0	1	0	365	6	2,190	$0	$0	$94,170	$0	$94,170	$0	$0	$94,170
f. Time to train personnel	0	16	100	0	1	6	696	$0	$6,336	$25,800	$0	$32,136	$0	$0	$32,136
TOTAL							18,062					$782,561	$26,000	$72,000	$880,561

Table 3. THIRD YEAR RESPONDENT BURDEN HOURS AND COSTS

Information Collection Activities	A Labor Hours per Activity per Labor Category				B Activities per Respondent per Year	C Total Number of Respondents	D Total Hours per Year	E Labor Costs per Labor Category per Year (AxBxCxRate)				F Total Labor Costs per Year	G Annualized Start-up/ Capital Costs	H Annual O&M Costs	I Total Costs per year (F+G+H)
	Legal	Managerial	Technical	Clerical				Legal	Managerial	Technical	Clerical				
1. Applications	Not applicable to this rulemaking														
2. Surveys and studies	Not applicable to this rulemaking														
3. Acquisition, installation, and use of technology and systems															
a. Control device operating parameter monitoring system	0	8	100	0	0	6	0	$0	$0	$0	$0	$0	$16,800	$64,800	$81,600
b. Converter hood system parameter monitoring system	0	8	100	0	0	6	0	$0	$0	$0	$0	$0	$9,200	$7,200	$16,400
4. Reporting requirements															
a. Read instructions	8	8	16	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
b. Required activities															
c. Create information															
i. Conduct control device performance test	0	16	120	0	4.5	6	3,672	$0	$28,512	$139,320	$0	$167,832	$0	$0	$167,832
ii. Conduct converter building performance test	0	16	240	0	1	6	1,536	$0	$6,336	$61,920	$0	$68,256	$0	$0	$68,256
d. Gather existing information															
e. Write reports															
i. Initial notification	0	8	0	2	1	6	60	$0	$3,168	$0	$192	$3,360	$0	$0	$3,360
ii. Performance test notification	0	2	0	1	5.5	6	99	$0	$4,356	$0	$528	$4,884	$0	$0	$4,884
iii. Initial compliance determination	0	8	40	8	1	6	336	$0	$3,168	$10,320	$768	$14,256	$0	$0	$14,256
iv. Performance test reports	0	8	80	16	5.5	6	3,432	$0	$17,424	$113,520	$8,448	$139,392	$0	$0	$139,392
v. Summary report	0	4	40	8	2	6	624	$0	$3,168	$20,640	$1,536	$25,344	$0	$0	$25,344
5. Recordkeeping Requirements															
a. Read instructions	8	8	40	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
b. Plan activities	0	8	100	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
c. Implement activities															
i. Prepare startup/shutdown/ malfunction plan	8	16	80	8	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
ii. Copper concentrate dryer															
Monitor control device parameters	0	0	0.5	0	365	6	1,095	$0	$0	$47,085	$0	$47,085	$0	$0	$47,085
iii. Smelting vessel															
Inspect tapping hood system	0	0	4	0	12	6	288	$0	$0	$12,384	$0	$12,384	$0	$0	$12,384
Monitor control device parameters	0	0	0.5	0	365	6	1,095	$0	$0	$47,085	$0	$47,085	$0	$0	$47,085
iv. Slag cleaning vessel															
Inspect tapping hood system	0	0	4	0	12	2	96	$0	$0	$4,128	$0	$4,128	$0	$0	$4,128
Monitor control device parameters	0	0	0.5	0	365	2	365	$0	$0	$15,695	$0	$15,695	$0	$0	$15,695
v. Batch copper converters															
Inspect converter hood system	0	0	4	0	12	6	288	$0	$0	$12,384	$0	$12,384	$0	$0	$12,384
Monitor hood system ventilation parameters	0	0	0.5	0	365	6	1,095	$0	$0	$47,085	$0	$47,085	$0	$0	$47,085
Monitor control device parameters	0	0	0.5	0	365	6	1,095	$0	$0	$47,085	$0	$47,085	$0	$0	$47,085
vi. Prepare fugitive dust control plan	8	16	100	8	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
d. Develop record system	0	16	100	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
e. Time to enter information	0	0	1	0	365	6	2,190	$0	$0	$94,170	$0	$94,170	$0	$0	$94,170
f. Time to train personnel	0	16	100	0	1	6	696	$0	$6,336	$25,800	$0	$32,136	$0	$0	$32,136
TOTAL							18,062					$782,561	$26,000	$72,000	$880,561

Table 4. FIRST YEAR AGENCY BURDEN HOURS AND COSTS

INFORMATION COLLECTION ACTIVITY	A AGENCY LABOR HOURS PER ACTIVITY PER LABOR CATEGORY				B AGENCY ACTIVITIES PER RESPONDENT PER YEAR	C TOTAL NUMBER OF RESPONDENTS (from Table 1)	D TOTAL AGENCY HOURS PER YEAR	E AGENCY LABOR COSTS PER LABOR CATEGORY PER YEAR (A x B x C x RATE)				F TOTAL AGENCY LABOR COSTS PER YEAR	G ANNUALIZED CAPITAL COSTS	H ANNUAL AGENCY O&M COSTS	I TOTAL AGENCY COSTS PER YEAR (F+G+H)
	Legal	Mgmt.	Technical	Clerical				Legal	Mgmt.	Technical	Clerical				
1. REPORT REVIEW															
a. Initial notification	0	1	4	0	1	6	30	$0	$327	$792	$0	$1,119	$0	$0	$1,119
b. Performance test notification	0	1	4	0	5.5	6	165	$0	$1,799	$4,356	$0	$6,154	$0	$0	$6,154
c. Initial compliance determination	0	1	8	0	1	6	54	$0	$327	$1,584	$0	$1,911	$0	$0	$1,911
d. Performance test reports	0	1	8	0	5.5	6	297	$0	$1,799	$8,709	$0	$10,509	$0	$0	$10,509
e. Semiannual summary report	0	1	8	0	2	6	108	$0	$654	$3,167	$0	$3,821	$0	$0	$3,821
2. SITE COMPLIANCE INSPECTIONS															
a. Observe control device performance tests	0	0	16	0	4	6	384	$0	$0	$12,668	$0	$12,668	$0	$7,200	$19,868
b. Observe converter building visible emission performance tests	0	0	24	0	1	6	144	$0	$0	$4,751	$0	$4,751	$0	$3,600	$8,351
c. Review smelter startup/shutdown/ malfunction plan	0	0	8	0	1	6	48	$0	$0	$1,584	$0	$1,584	$0	$1,200	$2,784
d. Review smelter fugitive dust control plan	0	0	8	0	1	6	48	$0	$0	$1,584	$0	$1,584	$0	1,200	$2,784
e. Review site records	8	0	8	0	1	6	96	$4,128	$0	$1,584	$0	$5,712	$0	$1,200	$6,912
f. Visual inspection of air control equipment used to comply with rule requirements	8	0	8	0	1	6	96	$4,128	$0	$1,584	$0	$5,712	$0	$1,200	$6,912
3. ENFORCEMENT ACTIONS															
a. Issue notice of violation	0	0	0	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
b. Follow-up site inspection	0	0	0	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
c. Litigation	0	0	0	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
TOTAL							1,470					$55,523	$0	$15,600	$71,123

Table 5. SECOND YEAR AGENCY BURDEN HOURS AND COSTS

INFORMATION COLLECTION ACTIVITY	A AGENCY LABOR HOURS PER ACTIVITY PER LABOR CATEGORY				B AGENCY ACTIVITIES PER RESPONDENT PER YEAR	C TOTAL NUMBER OF RESPONDENTS (from Table 2)	D TOTAL AGENCY HOURS PER YEAR	E AGENCY LABOR COSTS PER LABOR CATEGORY PER YEAR (A x B x C x RATE)				F TOTAL AGENCY LABOR COSTS PER YEAR	G ANNUALIZED AGENCY CAPITAL COSTS	H ANNUAL AGENCY O&M COSTS	I TOTAL AGENCY COSTS PER YEAR (F+G+H)
	Legal	Mgmt.	Technical	Clerical				Legal	Mgmt.	Technical	Clerical				
1. REPORT REVIEW															
a. Initial notification	0	1	4	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
b. Performance test notification	0	1	4	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
c. Initial compliance determination	0	1	8	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
d. Performance test reports	0	1	8	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
e. Semiannual summary report	0	1	8	0	2	6	108	$0	$654	$3,167	$0	$3,821	$0	$0	$3,821
2. SITE COMPLIANCE INSPECTIONS															
a. Observe control device performance tests	0	0	16	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
b. Observe converter building visible emission performance tests	0	0	24	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
c. Review smelter startup/shutdown/ malfunction plan	0	0	8	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
d. Review smelter fugitive dust control plan	0	0	8	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
e. Review site records	8	0	8	0	1	6	96	$4,128	$0	$1,584	$0	$5,712	$0	$1,200	$6,912
f. Visual inspection of air control equipment used to comply with rule requirements	8	0	8	0	1	6	96	$4,128	$0	$1,584	$0	$5,712	$0	$1,200	$6,912
3. ENFORCEMENT ACTIONS															
a. Issue notice of violation	0	0	0	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
b. Follow-up site inspection	0	0	0	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
c. Litigation	0	0	0	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
TOTAL							300					$15,244	$0	$2,400	$17,644

Table 6. THIRD YEAR AGENCY BURDEN HOURS AND COSTS

INFORMATION COLLECTION ACTIVITY	A AGENCY LABOR HOURS PER ACTIVITY PER LABOR CATEGORY				B AGENCY ACTIVITIES PER RESPONDENT PER YEAR	C TOTAL NUMBER OF RESPONDENTS (from Table 3)	D TOTAL AGENCY HOURS PER YEAR	E AGENCY LABOR COSTS PER LABOR CATEGORY PER YEAR (A x B x C x RATE)				F TOTAL AGENCY LABOR COSTS PER YEAR	G ANNUALIZED AGENCY CAPITAL COSTS	H ANNUAL AGENCY O&M COSTS	I TOTAL AGENCY COSTS PER YEAR (F+G+H)
	Legal	Mgmt.	Technical	Clerical				Legal	Mgmt.	Technical	Clerical				
1. REPORT REVIEW															
a. Initial notification	0	1	4	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
b. Performance test notification	0	1	4	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
c. Initial compliance determination	0	1	8	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
d. Performance test reports	0	1	8	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
e. Semiannual summary report	0	1	8	0	2	6	108	$0	$654	$3,167	$0	$3,821	$0	$0	$3,821
2. SITE COMPLIANCE INSPECTIONS															
a. Observe control device performance tests	0	0	16	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
b. Observe converter building visible emission performance tests	0	0	24	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
c. Review smelter startup/shutdown/ malfunction plan	0	0	8	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
d. Review smelter fugitive dust control plan	0	0	8	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
e. Review site records	8	0	8	0	1	6	96	$4,128	$0	$1,584	$0	$5,712	$0	$1,200	$6,912
f. Visual inspection of air control equipment used to comply with rule requirements	8	0	8	0	1	6	96	$4,128	$0	$1,584	$0	$5,712	$0	$1,200	$6,912
3. ENFORCEMENT ACTIONS															
a. Issue notice of violation	0	0	0	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
b. Follow-up site inspection	0	0	0	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
c. Litigation	0	0	0	0	0	6	0	$0	$0	$0	$0	$0	$0	$0	$0
TOTAL							300					$15,244	$0	$2,400	$17,644