

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels (40 CFR part 60, subparts AA and AAa) (Renewal)

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for electric arc furnaces were proposed on October 21, 1974 (39 FR 37466), and promulgated on September 23, 1975 (40 CFR 43850). These standards apply to the following affected facilities in steel plants that produce carbon, alloy, or specialty steels: electric arc furnaces (EAFs) and dust handling systems commencing construction, modification or reconstruction after the date of proposal and on or before August 17, 1983. A review of NSPS subpart AA in 1980 resulted in the promulgation of a new standard (NSPS subpart AAa). The review of NSPS subpart AA found that fugitive emissions capture technology had improved since promulgation of NSPS subpart AA, and that argon-oxygen decarburization (AOD) vessels are a significant source of particulates in specialty steel shops. NSPS subpart AAa was proposed on August 17, 1983, and promulgated on October 31, 1984. It established new standards applicable to EAFs, AOD vessels, and dust handling systems constructed, modified, or reconstructed after August 17, 1983. Subsequently, the Agency amended NSPS subparts AA and Aa to provide monitoring flexibility to sources. On March 2, 1999, the Agency approved daily shop opacity observations as an alternative to static pressure monitoring at an EAF with a direct shell evacuation system, and clarified some definitions. On February 22, 2005, the Agency approved the use of bag leak detection systems couple with daily shop opacity observations as an alternative to continuous opacity monitoring. This Information Collection Request (ICR) incorporates the burden changes resulting from the year 2005 rules amendment which were identified in ICR 1060.13. This information is being collected to assure compliance with 40 CFR part 60, subparts AA and AAa.

In general, all NSPS 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 NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two 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.

Over the next three years, an average of 96.6 respondents per year will be subject to the standard.

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 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

In the Administrator's judgment, particulate matter emissions from electric arc furnaces, argon-oxygen decarburization (AOD) vessels and dust handling systems cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS standards were promulgated for this source category at 40 CFR part 60, subparts AA and AAa.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standards 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 standards. Continuous emission monitors are also used to ensure compliance with the standards 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 standards 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 standards are 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 60, subparts AA and AAa.

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 (71 FR 35652) on June 21, 2006. No comments were received on the burden published in the Federal Register.

3(c) Consultations

It is our policy to carefully review any comments received since the last ICR renewal including those submitted in response to the first federal register notice and respond appropriately. The Agency's internal industry experts have been consulted. The Agency's internal data sources and any projections of industry growth over the next three years have also been considered.

The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the AFS (Air Facility Subsystem) which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of all compliance data. Approximately 96.6 respondents are currently subject to the regulation, and one additional respondent will become subject to the regulation over the next three years.

It should be noted that the respondents, the industry trade associations 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.

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.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

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 of the recordkeeping and reporting requirements are within the United States Standard Industrial Classification (SIC) Code 3312: Steel Works, Blast Furnaces (Including Coke Ovens), and Rolling Mills (except coke ovens not integrated with steel mills) which corresponds to the year 1997, North American Industry Classification System (NAICS) Code 331111: Iron and Steel Mills.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by 40 CFR part 60,

subparts AA and AAa.

A source must make the following reports:

Reports for 40 CFR part 60, subparts AA and Aaa	
Notification of date of construction/reconstruction	60.7(a)(1)
Notification of demonstration of compliance with the particulate matter standard	60.276(c)
Notification of actual startup	60.7(a)(3)
Notification of initial performance test	60.8(d)
Report of performance test results	60.8 (a)
Notification of demonstration of the continuous monitoring system performance commences	60.7(a)(5)
Notification of procedures to be followed during performance tests if emissions is combined with non-affected facilities	60.276(b)(2)
Physical or operational change	60.7(a)(4)
Use of opacity or visible emissions observations during performance test	60.7(a)(6-7)
Provide semiannual reports of operational values that exceed (i.e., furnace static pressure, fan motor amperes) or are below (i.e., flow rates) those established during the performance test, and of all shop opacity observations in excess of the emission limit	60.7(c), 60.276(a), 60.276(d), 60.276 a(c), 60.276a (g)

A source must maintain the following records:

Recordkeeping for 40 CFR part 60, subparts AA and Aa	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative.	60.7(b)
Furnace static pressure measurements or daily observations of shop opacity by a certified visible emission observer if EAF is equipped with a direct shell evacuation system (DEC).	60.273(d), 60.274(f), 60.276(d), 60.274a (f)
Daily records of operational parameters, such as time and duration of each charge, time and duration of each tap, flow rate data, pressure data.	60.274(a-b), 60.274a (b)
Note deficiencies during monthly control system fan motor amperes operational status check.	60.274(f), 60.274a (f)

Recordkeeping for 40 CFR part 60, subparts AA and Aa	
Maintain a file of all measurements including, performance test measurements, and all other information required by this part recorded in a permanent file suitable for inspection. The file shall be retained for at least two years.	60.7(f), 60.276a (a)
Record of time and duration of each charge and tap (NSPS subpart AA only).	60.274(a)

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.

Also regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate a compliance monitoring system (CMS) for the measurement of daily monitoring of the opacity of visible emissions.
Daily monitoring of operations includes time and duration of each charge, time and duration of each tap, flow rate data and pressure data.
Daily emissions monitoring includes stack emissions monitoring using a continuous opacity monitor or bag leak detection systems couple with opacity shop observations, if the source has an EAF equipped with a direct shell evacuation system (DEC) and uses a negative pressure baghouse; and fugitive emissions monitoring using a furnace static pressure monitoring device or by electing to perform shop opacity observations using a certified visible emissions observer, if the source has an EAF equipped with a DEC.
Conduct monthly operational status inspections of the equipment that is important in the performance of the capture system (i.e., pressure sensors, dampers and its switches) and should include observations of the physical appearance of the system (i.e., presence of holes in ductwork, and fan erosion).
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.

Respondent Activities
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.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., flow rate indicators); however, personnel at the facility still need to evaluate the data. However, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronically reporting systems are still not widely used by the regulatory agencies.

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

5(a) Agency Activities

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

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the AIRS Facility Subsystem (AFS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority 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. 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 entered into the AFS which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for two years.

5(c) Small Entity Flexibility

The majority of the sources subject to NSPS subparts AA and AAa, can be considered small businesses. However, the recordkeeping and reporting requirements are the same for both small and large minimills since the process operations and the types of control equipment employed by them are similar, independently of their size. In addition, EPA reduced the reporting frequency for this information from quarterly to semiannually in a December 1990 Federal Register notice to reduce the impact of reporting burden on small businesses. The reduction in reporting frequency was respondent to OMB's previous questions regarding the need for quarterly versus semiannual reporting.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: NSPS for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels (40 CFR part 60, subparts AA and AAa).

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 each of the subparts 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 60,112 (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 NSPS 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	\$100.99 (\$48.09 + 110%)
Technical	\$87.97 (\$41.89 + 110%)
Clerical	\$43.81 (\$20.86 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December, 2005, Table 2. Civilian Workers, by occupational and industry group. The rates are from column 1, Total compensation. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

The type of industry costs associated with the information collection activities in the subject standards are 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 monitors and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Startup Cost for One Affected Facility	(C) Number of New Affected Facilities to Startup	(D) Total Startup Cost (B X C)	(E) Annual O&M Costs for One Affected Facility	(F) Number of Affected Facilities with O&M	(G) Total O&M Cost (E X F)
Continuous Opacity Monitors	\$25,000	0	\$0	\$7,500	25.9	\$194,250
Furnace Static Pressure Monitors	\$300	0.3	\$90	\$0	49.3	\$0
Volumetric Flow Rate Monitor	\$18,000	0.3	\$4,050	\$0	96.6	\$0
TOTAL			\$4,140			\$194,250

The total capital/startup costs for this ICR are \$4,140. This is the total of column D in

the above table. This is based on one new respondent over the three-year period of this ICR.

The total operation and maintenance (O&M) costs for this ICR are \$198,390. This is the total of column G. This is based on the assumptions that: 33 percent of respondents using negative baghouses (38.6) have elected to use the alternative option of using bag leak detection systems couple with opacity shop observations instead of using COMs to measure stack emissions; 51.7 percent (49.3) of respondents have elected to comply with the fugitive emissions monitoring requirements by measuring the furnace static pressure continuously; all respondents (96.6) are required to installed flow rate monitors as part of the monitoring of operations rule requirements; and that the operating and maintenance costs associated with the pressure and flow monitors are negligible.

The total respondent costs in block 14 have been calculated as the addition of the capital/startup costs, and the annual operation and maintenance costs. 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 \$198,390. The continuous monitoring costs that are included in this section consist only of those capital start-up and O&M costs that a source incurs as a result of the standard. Some continuous monitoring costs may not be included in this section. For instance, if a particular industry typically utilizes a control device that must have a continuous monitor (e.g., temperature, pressure drop, etc.) to function properly, and the recordation of additional measurements beyond the minimum are required by the standard, then there is no capital startup or O&M cost, but there is a labor cost to record the additional readings. Such a cost would not appear in this section, but in the industry burden section 6(d) below.

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 \$74,847.

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

Managerial	\$57.20	(GS-13, Step 5, \$35.75 x 1.6)
Technical	\$42.45	(GS-12, Step 1, \$26.53 x 1.6)
Clerical	\$22.96	(GS-6, Step 3, \$14.35 x 1.6)

These rates are from the Office of Personnel Management (OPM) 2006 General Schedule@ which excludes locality rates of pay. These rates can be obtained from the OPM web site, <http://www.opm.gov/oca/payrates/index/htm>. Details upon which this estimate is based appear in Table 2: Annual Agency Burden and Cost: NSPS for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels (40 CFR part 60, subparts AA and AAa),

attached.

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 96.6 existing respondents will be subject to the standard. It is estimated that an additional respondent over the three-year period of this ICR will become subject to the standard. The overall average number of respondents, as shown in the table below is 96.6 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0.3	96.3	0	0	96.3
2	0.3	96.6	0	0	96.6
3	0.3	96.9	0	0	96.9
Average	0.3	96.6	0	0	96.6

¹ 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 96.6.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of actual startup	0.3	1	0	0.3
Notification of construction/modification	0.3	1	0	0.3
Notification of performance test	0.3	1	0	0.3

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(B \times C)+D$
Reports of performance test results	0.3	1.2	0	0.36
Semiannual reports	96.6	2	0	193.2
			Total	194.46

The number of Total Annual Responses is 195 (rounded). The total annual labor costs are \$5,087,832. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NSPS for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels (40 CFR part 60, subparts AA and AAa), attached.

The total annual capital/startup and O&M costs to the regulated entities are \$199,740. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The average annual Agency burden and cost over the next three years is estimated to be 1,789 labor hours at a cost of \$74,847. See Table 2. Annual Agency Burden and Cost: NSPS for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels (40 CFR part 60, subparts AA and AAa), attached.

6(e) Bottom Line Burden Hours 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, respectively, and summarized below.

(i) Respondent Tally

The total annual labor costs are \$5,087,832. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NSPS for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels (40 CFR part 60, subparts AA and AAa), attached. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 308 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$198,390. 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 the next three years is estimated to be

1,789 labor hours at a cost of \$74,847. See Table 2. Annual Agency Burden and Cost: NSPS for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels (40 CFR part 60, subparts AA and AAa), attached.

6(f) Reasons for Change in Burden

The decrease in burden from the most recently ICR is due to an adjustment. The change in burden from 60,400 hours to 60,112 for the new and existing facilities is due primarily to a change made on the number of operational days from 365 to 350 which offsets any increase that resulted from the increase on the number of average respondents per year from 95.3 to 96.6. The labor hours for management, clerical, as well as for technical employees have been updated.

The decrease in the annualized capital/startup and operation and maintenance costs from \$285,750 to \$198,390 is due to a decrease of the number of respondents using continuous opacity monitors (COMs) for compliance with the stack emissions requirements. This is an update to the most recently approved ICR (i.e., ICR 1060.13) which did not account for this type of burden change as a result of the 2005 amendments to the standard. The operation and maintenance costs for the renewal of this ICR decreased due to a decrease on the number of sources using COMs as a result of electing to comply with the alternative option of daily opacity shop observations by a certified visible emission observer couple with the use of bag leak detection systems (BLDS).

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 308 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's regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2006- 0448. 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 B 3334, 1301 Constitution Avenue, NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2006- 0448 and OMB Control Number 2060-0038 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: NSPS Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels (40 CFR part 60, subparts AA and AAa)

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, \$ ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Read instructions	Included in 4B							
B. Required activities:								
i. Initial Performance tests ^c	364	1	364	0.3	109.2	5.5	10.9	\$10,636.14
ii. Repeat Performance tests ^c	364	0.2	72.8	0.3	21.8	1.1	2.2	\$2,126.85
iii. Monitoring of operations and emissions ^{d, e}	Included in 5E							
D. Gather Existing Information	Included in 4B and 5E							
E. Write report ^{a, c}								
i. Notification of actual startup	2	1	2	0.3	0.6	0.03	0.06	\$58.44

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, \$ ^b
ii. Notification of construction/ modification ^a	2	1	2	0.3	0.6	0.03	0.06	\$58.44
iii. Notification of performance test	2	1	2	0.3	0.6	0.03	0.06	\$58.44
iv. Reports of performance test results	Included in 4B							
v. Semiannual reports ^f	16	2	32	96.6	3,091.2	154.6	309.1	\$297,610.58
5. Recordkeeping Requirements								
A. Read instructions	Included in 4A							
B. Plan activities	Included in 4B							
C. Implement activities	Included in 4B							
D. Develop record system	N/A							
E. Time to enter and transmit information:								
i. Records of daily monitoring of operations ^d	0.75	350	273.8	96.6	25,352.5	1,267.6	2,535.3	\$2,469,346.18
ii. Records of daily emissions monitoring by a certified observer ^e	0.5	350	182.5	47.3	8,277.5	413.9	827.8	\$806,233.14

Burden item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person- hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
iii. Records of COMS ^g	0.5	350	175.0	25.9	4,532.5	226.6	453.3	\$431,498.57
iv. Records of BLDS ^{h,i}	0.5	350	175.0	12.9	2,257.5	112.9	225.8	\$219,882.13
v. Records of static furnace ^h	0.5	350	175.0	49.3	8,627.5	431.4	862.8	\$840,323.32
F. Time to train personnel	N/A							
G. Time for audits	N/A							
TOTAL LABOR BURDEN AND COST					52,271.5	2,613.6	5,227.2	\$5,087,832.22
TOTAL LABOR HOURS (Rounded)					60,112.24			\$5,087,832

Assumptions:

^a We have assumed that there are approximately 96 sources currently subject to the NSPS, Subparts AA and AAa. This estimate includes 85 minimills and 10 steel forging facilities with electric arc furnaces (EAFs). We have further assumed that one minimill will become subject to the standard due to upgrading of its EAFs over the three year period of this ICR. Therefore, the average number of respondents per year is estimated to be 96.6 (rounded). The estimated number of respondents was determined using several resources including queries on EPA's databases such as the Sector Facility Indexing Project (SFIP), the Applicability Determination Index (ADI) and the Airs Facility System (AFS); consultation with the National Iron and Steel Expert in Region 5 and the rule contact for the amendment of these rule in the Office of Planning Quality and Standards (OAQPS); and research on the website of the Association of Iron and Steel Engineers (AISI).

^b This ICR uses the following labor rates: \$100.99 per hour for Executive, Administrative, and Managerial labor; \$87.97 per hour for Technical labor, and \$43.81 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December, 2005, ATable 2. Civilian Workers, by occupational and industry group. © The rates are from column 1, ATotal compensation. © The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

- ^c We have assumed that existing sources are in compliance with initial rule requirements including the initial performance test and notification requirements. Method 9 is used by a certified observer to determine the opacity of visible emissions from the shop. Method 5,5D is used to determine particulate matter emissions and the volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 4 hours and shall include an integral number of heats for EAF. We have assumed that usually 20 percent of the sources would repeat performance tests due to failure.
- ^d Daily monitoring of operations includes time and duration of each charge, time and duration of each tap, flow rate data and pressure data. In addition, sources are required to conduct monthly operational status checks of the equipment (e.g., physical appearance, pressure sensors, dampers, damper switches).
- ^e Daily emissions monitoring includes stack emissions monitoring using a continuous opacity monitor if the source has an EAF equipped with a direct shell evacuation system (DEC) and uses a negative pressure baghouse, and has not elected the alternative option. In addition, the source is required to conduct fugitive emissions monitoring using a furnace static pressure monitoring device or by electing to perform shop opacity observations using a certified visible emissions observer, if the source has an EAF equipped with a DEC.
- ^f Sources are required to provide semiannual reports of opacity observations and operational values (i.e., furnace static pressure, fan motor amperes) that exceed or are below (i.e., flow rates) those established during the performance test, and of all shop opacity observations in excess of the emission limit.
- ^g We have assumed that the new source will equip its EAFs with a DEC system and use a positive pressure baghouse, and therefore, will not be required to install a continuous opacity monitor (COMS).
- ^h We have assumed that approximately 51.7 percent of the respondents (or 49.3 respondents) will choose to comply with the fugitive emissions monitoring requirements by measuring the furnace static pressure continuously and 48.3 percent (46 respondents) will choose the alternative option of daily opacity shop observations by a certified visible emission observer couple with the use of bag leak detection systems (BLDS).
- ⁱ We have assumed that approximately 40 percent of respondents (38.6) use negative pressure baghouses. Of these, 33 percent (12.8) have elected to use the alternative option of using bag leak detection system (BLDS) monitoring couple with visible emissions observations instead of using COMS (25.9) to measure stack emissions.

Table 2. Annual Burden and Cost for the Federal Government: NSPS Steel Plants:

Electric Arc Furnaces and Argon-Oxygen

Decarburization Vessels (40 CFR part 60, subparts AA and AAa)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
Notification of construction/ modification ^c	2	1	2	0.3	0.6	0.03	0.06	\$28.87
Notification of actual startup	1	1	1	0.3	0.30	0.02	0.03	\$14.72
Notification of initial performance test	0.5	1.2	0.6	0.3	0.18	0.01	0.02	\$8.76
Reports of performance test results ^c	24	1	24	0.3	7.20	0.40	0.70	\$348.26
Repeat of Performance Test	24	0.2	4.8	0.3	1.44	0.07	0.14	\$69.08
Notification of COMS demonstration	0.5	1.2	0.6	0.3	0.18	0.01	0.02	\$8.76
Semiannual reports ^d	8	2	32	96.6	1,545.60	77.28	154.56	\$74,368.09
Subtotal Burden and Cost					1,555.50	77.78	155.55	\$74,846.54
TOTAL ANNUAL BURDEN AND COST (rounded)						1,789		\$74,847

Assumptions:

^a We have assumed that one minimill (0.3 source per year) will become subject to the standard due to upgrading of its electric arc furnaces over the 3 year period of this information collection request.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$57.20 (GS-13, Step 5, \$35.75 x 1.6), Technical rate of \$42.96 (GS-12, Step 1, \$26.53 x 1.6), and Clerical rate of \$22.96 (GS-6, Step 3, \$14.35 x 1.6). These rates are from the Office of Personnel Management (OPM) A2006 General Schedule@ which excludes locality rates of pay.

^c We have assumed that 20 percent of initial performance tests will be repeated due to failure.

^d We have assumed that all respondents will have at least one incident of fugitive emissions that will exceed the standard with the 6-month period.

^e We have assumed that there are approximately 95 existing sources currently subject to the NSPS, Subparts AA and AAa. This estimate includes 85 minimills and 10 steel forging facilities with electric arc furnaces (EAFs). We have further assumed that one minimill will become subject to the standard due to upgrading of its EAFs. Therefore, the average number of respondents per year is estimated to be 95.3. The estimated number of respondents was determined using several resources including queries on EPA=s databases such as the Sector Facility Indexing Project (SFIP), the Applicability Determination Index (ADI)and the Airs Facility System (AFS); consultation with the National Iron and Steel Expert in Region 5 and the rule contact for the amendment of these rule in the Office of Planning Quality and Standards (OAQPS); and research on the web site of the Association of Iron and Steel Engineers (AISI).