

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Taconite Iron Ore Processing

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Taconite Iron Ore Processing (40 CFR part 63, subpart RRRRR) (Renewal)

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP), for the regulations published were proposed on December 18, 2002, (67 FR 77561), and promulgated on October 30, 2003, (68 FR 61867). These regulations apply to each existing and new taconite iron ore processing plant that is a major source of hazardous air pollutant (HAP) if it emits or has the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year. The effective sources in this subpart covers emissions from ore crushing and handling emission units, ore dryer stacks, indurating furnace stacks, finished pellet handling emission units, and fugitive dust emissions.

In general, all NESHAP standards require a one-time only initial notification report, initial performance tests for ore crushing and handling units and finished pellet handling units, the rule allows initial testing on representative emission units instead of on each emission unit, and for ore dryers and indurating furnaces the rule required that performance tests be conducted on all corresponding stacks. Semiannual compliance reports are required, an immediate report is required if actions taken in response to the startup, shutdown, or malfunction is not consistent with the plan, and a notification of compliance status report is required.

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.

Based on our consultations with industry representatives, there is an average of one affected facilities at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of eight respondents per year will be subject to the standard, with no additional respondent per year becoming subject to the regulation over the next three years.

The taconite iron ore industry consists of eight processing plants in the United States, which are all publicly owned subsidiaries of integrated steel companies. None of the eight plants in the United States are owned by either state, local, tribal or the Federal Government.

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (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 taconite iron ore processing plants 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 RRRRR.

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 and leaks are being detected and repaired and 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 RRRRR).

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

Consultation with industry representative (i.e., respondent) was conducted to determine if there is anyway for EPA to reduce the recordkeeping and reporting burden or improve the language in the standard to make it easier to comply. Our contact was U. S. Geological Survey, Mr. John D. Jorgenson, (703-648-4912).

We also reference the most recent ICR, consulted with the preparer of the active ICR, and used other resources to obtain the most recent data available. We reviewed information available from the United States Census Bureau, websites covering taconite iron ore processing, and the AIRS Facility Subsystem (AFS) database, which is the primary source of information regarding the number of existing sources along with industry consultations which was used to verify the AFS data. We also consulted with EPA's Office of Air Quality Planning and Standards, Information Transfer and Program Integration Division.

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 (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 to the recordkeeping and reporting requirements are taconite iron ore processing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standard is SIC 1011, which corresponds to the North American Industry Classification System (NAICS) 212210 code for taconite iron ore processing facilities.

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

In this ICR, all the data that is recorded or reported is required by NESHAP for Taconite Iron Ore Processing (40 CFR part 63, subpart RRRRR).

A source must make the following reports:

Notifications	Standard Citation by Sections
Initial notification	63.9640(b), 63.9(b)-(c)
Notification of intent to conduct a performance test	63.9640(d), 63.7(b)(1)
Notification of compliance status	63.9640(e), 63.9(h)(2)(ii)
Request to conduct a new performance test	63.9622(f)

Reports for 40 CFR part 63, subpart RRRRR	
Semiannual compliance report	63.9641(a), 63.8(c)(7)-(8), 63.10(d)(5)(i)
Startup, shutdown, or malfunction report	63.9641(c), 63.10(d)(5)(ii)

A source must keep the following records:

Recordkeeping for 40 CFR part 63, subpart RRRRR	
Notifications and reports	63.9642(a)(1), 63.10(b)(2)(xiv)
Startups, shutdowns or malfunctions, periods where the continuous monitoring system is inoperative.	63.9642(a)(2), 63.6(e)(3)(iii)-(v)
Performance tests	63.9642(a)(3), 63.10(b)(2)(viii)
Records for continuous opacity monitoring system (COMS)	63.9642(b), 63.10(b)(2)(vi), 63.6(h)(7)(i)-(ii)
Records required to demonstrate continuous compliance	63.9642(4), 10(b)(2)(vii)

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 CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2F, 2G, 3, 3A, 3B, 4, 5, 5D, or 17 tests, 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.
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.

Currently, sources are using automated monitoring equipment that provides parameter data. Although personnel at the sources still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

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.

Agency Activities
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 five years.

5(c) Small Entity Flexibility

A 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 Table 1: Annual Industry Burden for NESHAP for Taconite Iron Ore Processing (40 CFR part 63, subpart RRRRR).

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. Wherever 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 408 (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	\$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 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 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) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startu p Cost (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Scrubbers	\$150,000	0	\$0	\$12,900	8	\$103,200
Baghouses	\$225,000	0	\$0	\$19,300	8	\$154,400

The total capital/startup costs for this ICR are zero. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$257,600. 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 year of the ICR is estimated to be \$257,600.

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 \$7,841.

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. Details upon which this estimate is based appear in Table 2: Average Annual EPA Burden – NESHAP for Taconite Iron Ore Processing (40 CFR part 63, subpart RRRRR), below.

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 eight existing respondents will be subject to the standard. It is estimated that no additional respondent per year will become subject. The overall average number of respondents, as shown in the table below is eight 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	(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	8	0	0	8
2	0	8	0	0	8
3	0	8	0	0	8
Average	0	8	0	0	8

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 eight.

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
Initial notification	0	1	0	0
Compliance extension request	0	1	0	0
Site-specific test plan	1.6	1	0	1.6
Operation and maintenance plan	0	1	0	0
Fugitive dust emission control plan	0	1	0	0
Site-specific monitoring plan	0	1	0	0
Semiannual compliance reports	8	2	0	16
Petition for alternative monitoring requirements	0	1	0	0
Notification of performance tests	1.6	3	0	4.8
			Total (rounded)	22

The number of Total Annual Responses is 22.

The total annual labor costs are \$234,397. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Taconite Iron Ore Processing (40 CFR part 63, subpart RRRRR), below.

The total annual capital/startup and O&M costs to the regulated entities are \$257,600. 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 next three years is estimated to be 184 labor hours at a cost of \$7,841. See Table 2: Annual Agency Burden and Cost, NESHAP for Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR), below.

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 \$234,397. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR), below. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 18 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$257,600. 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 184 labor hours at a cost of \$7,841. See Table 2: Annual Agency Burden and Cost, NESHAP for Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR), below.

6(f) Reasons for Change in Burden

The decrease in both labor burden hours and cost from the most recently approved ICR is due to the fact that within the past three years the respondent completed those activities that are required to achieve initial compliance, hence, the initial costs to comply continuously with the standard. There are also no new sources expected over the three year period of this ICR.

There is a decrease in the capital/startup vs. operation and maintenance (O&M) Cost; this change could be attributed to the fact that there are no new sources, and only O&M is accounted for at this time.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 18 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-2006-0430, which is available for online viewing at www.regulations.gov, or in person viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., N.W., 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 Enforcement and Compliance Docket and Information Center Docket is (202) 566-1927. An electronic version of the public docket is available online at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public 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 above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2006-0430 and OMB Control Number 2060-0538 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 Taconite Iron Ore Processing (40 CFR part 63, subpart RRRRR)

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. Reporting Requirements								
A. Read instructions ^c	2	1	2	0	0	0	0	\$0
B. Required activities								
Performance test – facility labor ^d	40	1	40	1.6	64	3.2	6.4	\$6,233.63
Performance test – contractor costs ^e	-	-	-	-	-	-	-	\$199,800.00
Startup , shutdown, and malfunction plan	40	1	40	1.6	64	3.2	6.4	\$6,233.63
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write reports								
Initial notification ^c	2	1	2	0	0	0	0	\$0
Compliance extension request ^c	2	1	2	0	0	0	0	\$0
Site-specific test plan ^f	40	1	40	1.6	64	3.2	6.4	\$6,233.63
Operation and maintenance plan ^g	40	1	40	0	0	0	0	\$0
Fugitive dust emission control plan ^h	20	1	20	0	0	0	0	\$0
Site-specific monitoring plan ⁱ	80	1	80	0	0	0	0	\$0
Semiannual compliance reports	8	2	16	8	128	6.4	12.8	\$12,467.27
Petition for alternative monitoring requirements	40	1	40	0	0	0	0	\$0
Notification of performance test ^j	4	3	12	1.6	19.2	0.96	1.92	\$1,870.08
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities ^k	3	1	3	0	0	0	0	\$0

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
C. Develop record system ^k	16	1	16	0	0	0	0	\$0
D. Time to train personnel ^k	3	1	3	0	0	0	0	\$0
E. Time to transmit or disclose information	1	2	2	8	16	0.8	1.6	\$1,558.41
F. Time for audits	N/A							
Subtotals Labor Burden and cost					355.2	17.76	35.52	\$234,396.65
TOTAL LABOR BURDEN AND COST (rounded)					408			\$234,397

Assumptions:

^a We have assumed that the average number of respondent that will be subject to the rule will be the eight existing respondents. There will be no additional new sources per year that will become subject to the rule over the three-year period of this ICR.

^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, March 19, 2005, ATable 2. Civilian Workers, by occupational and industry group. ^c The rates are from column 1, ATotal compensation. ^c The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c This is a one-time only activity.

^d We have assumed that it will take 40 hours for each facility to complete performance test, and that performance tests are repeated every two of five years.

^e We have assumed that contractors costs to complete performance testing are based on the following: (53 indurating furnaces and ore dryer Method 5 PM tests @\$8,000/test)+(115 OCH and PH Method 5 PM tests @ \$5,000/test) for a total of \$999,000 for three years. Therefore, contractor costs will be 20 percent (\$999,000 x 20%) = \$199,800 per year.

^f We have assumed that 20 percent of all sources will send in a site-specific test plan.

^g We have assumed that each respondent will take 40 hours to write the operation and maintenance plan.

^h We have assumed that each respondent will take 20 hours to write the fugitive dust emission control plan.

ⁱ We have assumed that each respondent will take 80 hours to complete the site-specific monitoring plan report.

^j We have assumed that each respondent will take 4 hours to complete the notification of performance test report.

Table 2: Average Annual EPA Burden - NESHAP for Taconite Iron Ore Processing (40 CFR part 63, subpart RRRRR)

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
Initial performance tests ^{c, d}	8	7	56	0	0	0	0	\$0
Report Review								
Initial notification ^c	2	1	2	0	0	0	0	\$0
Notification of initial performance test ^c	2	3	6	0	0	0	0	\$0
Fugitive dust emissions control plan ^e	10	1	10	0	0	0	0	\$0
Compliance extension request	2	1	2	0	0	0	0	\$0
Site-specific test plan ^f	10	1	10	1.6	16	0.8	1.6	\$985.90
Operation and maintenance plan ^g	10	1	10	0	0	0	0	\$0
Site-specific monitoring plan ^g	10	1	10	0	0	0	0	\$0
Petition for alternative monitoring requirements	5	1	5	0	0	0	0	\$0
Review of semiannual compliance report	4	2	8	8	64	3.2	6.4	\$3,046.78
Review of startup, shutdown, and malfunction plan	10	1	10	8	80	4	8	\$3,808.48
Subtotals Labor Burden and cost					160	8	16	\$7,841.16
TOTAL ANNUAL BURDEN AND COST (rounded)						184		\$7,841

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be the eight existing respondents. There will be no additional new sources per year that will become subject to the rule over the three-year period of this ICR.

^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 \$42.45 (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) A2005 General Schedule@ which excludes locality rates of pay.

^c This is a one-time only activity.

^d We have assumed that the initial performance test/occurrences per respondent are based on the following: (53 indurating furnaces and ore dryer Method 5 PM tests + 115 OCH and PH Method 5 PM tests) for a total of 168 Method 5 PM tests for three years.

^e We have assumed that each of the fugitive dust emissions control plan will not be unchanged.

^f We have assumed that none of the respondents will review the site-specific test plan.

^g We have assumed that it will take each respondent 10 hours to review the plan.