

## SUPPORTING STATEMENT

### NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) FOR IRON AND STEEL FOUNDRIES AREA SOURCES

#### PART A

##### 1.0 Identification of the Information Collection

###### *(a) Title and Number of the Information Collection.*

“NESHAP for Iron and Steel Foundries Area Sources.” This is a new information collection request (ICR) and the EPA tracking number is 2267.01.

###### *(b) Short Characterization.*

This ICR covers information collection requirements in the proposed area source NESHAP for iron and steel foundries (40 CFR Part 63, Subpart ZZZZZ). Potential respondents are owners or operators of any existing or new iron or steel foundry that is an area source of hazardous air pollutants (HAP) emissions. Research and development facilities are not covered by the rule. Foundries covered by the rule would not be required to obtain a Title V operating permit.

The proposed rule requires all foundries to comply with pollution prevention management practices for scrap materials and binder formulations. For metallic scrap, foundries would be required to operate according to written specifications for the use of only certain types of materials that do not generate HAP or that have been depleted (to the extent possible) of organics, mercury, and HAP metals. The requirements for binder formulations would require foundries to use only one type of production line chemical formulations that does not contain methanol as a specific ingredient of the catalyst formulation. The proposed management practices also include a pollution prevention initiative to encourage foundries to investigate and switch to nonHAP binders and coating materials by requiring records of the annual quantity and composition of each HAP-containing chemical binder or coating material used to make molds and cores. The proposed NESHAP allows foundries 1 year after promulgation to comply with the management practices.

Foundries with a metal melting rate permit capacity of 10,000 tons per year (tpy) or less

("small" foundries) would be required to comply with the pollution prevention management practices described above. These small foundries would submit two types of one-time notifications required by the NESHAP general provisions and keep records of specific information to demonstrate compliance with the rule requirements. The proposed rule also requires small foundries to calculate for each calendar month their 12-month rolling average production rate to ensure that the facility continues to meet the 10,000 tpy size criteria that defines a small iron and steel foundry. Records of the monthly production rate and monthly rolling average calculations would be required. A small foundry would be required to report any deviation from these requirements within 30 days.

Area source foundries with a metal melting rate greater than 10,000 tpy ("large" foundries) would be required to comply with the pollution prevention management practices in addition to emissions limits for metal melting furnaces. The owner or operator may elect to comply with emissions limits for particulate matter (PM) or total metal HAP. The proposed rule contains provisions for demonstrating compliance with the limits using emissions averaging. Control device operating parameter limits are also proposed. Three options are provided for monitoring baghouses at an existing foundry: (1) use a continuous parameter monitoring system (CPMS) to measure pressure drop across each baghouse cell and perform baghouse inspections, (2) manually measure and record the pressure drop across each baghouse cell once per day and perform baghouse inspections, or (3) operate a bag leak detection system (BLDS) for each baghouse. Bag leak detection systems would be required at new foundries. A CPMS would be required to measure and record pressure drop and scrubber water flow rate for a wet scrubber. For electrostatic precipitators, foundries would check and record the voltage and secondary current (or total power input) to the control device at least once a shift or use a CPMS to measure and record the hourly average voltage and secondary current (or total power input). Monthly inspections of capture systems would also be required. An operation and maintenance plan for control devices would be required. The proposed NESHAP also includes an opacity limit for fugitive emissions from buildings or structures housing foundry operations. Two monitoring options are provided: the foundry must conduct an opacity test at least every 6 months or have a trained employee make a weekly visual check for indication of abnormal operation; corrective action must be initiated within 24 hours if emissions indicate abnormal

operation. The proposed NESHAP allows 3 years after promulgation for large foundries to demonstrate compliance with the emissions limits and operation and maintenance requirements.

Large foundries would demonstrate initial compliance with emissions limits through performance tests. The owner or operator of an existing area source may certify initial compliance based on the results of a previous performance test that meets the rule requirements. Subsequent performance tests for furnaces would be performed every 5 years. Provisions also are included for demonstrating compliance through emissions averaging. A facility that uses emissions averaging would conduct monthly compliance determinations by calculating the weighted average emissions for furnaces in the emissions averaging group. Consistent with the NESHAP General Provisions, large foundries would submit one-time notifications; comply with requirements for startup, shutdown, and malfunction (SSM) plans and reports; submit semiannual excess emissions and monitoring system performance reports; and maintain records of specific information to ensure that the rule requirements are being achieved and maintained. The information requirements for foundries are listed in Attachment 1.

## **2. Need For and Use of the Collection**

### *(a) Need/Authority for the Collection.*

Section 112 of the Clean Air Act (CAA) requires EPA to establish NESHAP for both major and area sources of HAP that are listed for regulation under CAA section 112(c). An area source is a stationary source that is not a major source (i.e., an area source does not emit and does not have the potential to emit more than 10 tons per year of any single HAP or more than 25 tons per year of any combination of HAP). Requirements for area sources in CAA sections 112(c)(3) and 112(k) direct EPA to (1) identify at least 30 air toxics that present the greatest potential health threat in the largest number of urban areas and (2) to identify sufficient area source categories to ensure that sources representing 90 percent or more of the of the emissions of the 30 “listed” HAP are subject to regulation. EPA implements these requirements through the Integrated Urban Air Toxics Strategy (64 FR 38715, July 19, 1999). Both iron foundries and steel foundries were added to the Integrated Urban Air Toxics Strategy Area Source Category List in 2002 (67 FR 43113) based on emissions of HAP metals (chromium, lead, manganese, and nickel). We are proposing this standard in response to a court-ordered deadline that requires EPA to issue standards for 10 source categories listed pursuant to section 112(c)(3) and (k) by

December 15, 2007 (Sierra Club v. U.S. Environmental Protection Agency, no. 01-1537, D.D.C).

Under CAA section 112(d)(5), we may elect to promulgate HAP standards for area sources based on the use of generally available control technology (GACT) or management practices used by the sources. We can consider costs and economic impacts in determining GACT, which is particularly important when developing regulations for source categories that may have few establishments and many small businesses, or when determining whether additional control is needed for sources that are already well-controlled as a result of other air emissions standards. Facilities in these two source categories are either minimally controlled as a result of State and local requirements for PM or uncontrolled, and many of the 427 area source facilities are small entities. We have developed the proposed NESHAP based on GACT.

Foundries also emit small quantities of mercury, dioxins, and HAP organics from furnaces that melt scrap that contain tramp materials such as mercury-containing switches and chlorinated plastics. Organic HAP emissions also result from the use of binder and coating formulations. As required by the Pollution Prevention Act of 1990, we reviewed the rule prior to proposal to identify opportunities to apply pollution prevention measures which “reduce the volume of, or eliminate emissions of, such emissions through process changes, substitution of materials, or other modifications.” As a result, we are proposing pollution prevention management practices for the control of HAP (organics, metals, and mercury) in the charge materials used by foundries. We are also proposing to require the use of non-methanol binder formulations in certain applications and a recordkeeping requirement for information on the quantity and composition of each HAP-containing binder or coating material used to make molds and cores.

Certain records and reports are necessary for the Administrator to confirm the compliance status of area sources, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the Clean Air Act (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions. Under part 63, the owner or operator must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(b) *Use/Users of the Data.*

The information will be used by the delegated authority (State agency or Regional Administrator if there is no delegated State agency) to ensure that the emissions limits and other requirements are being achieved. Based on review of the recorded information at the site and the reported information, the delegated permitting authority can identify facilities that may not be in compliance and decide which plants, records, or processes may need inspection.

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

(a) *Nonduplication.*

A computer search of EPA's ongoing ICR's revealed no duplication of information-gathering efforts. The information collection requirements in 40 CFR part 63, Subpart EEEEE apply only to iron and steel foundries that are major sources of HAP.

(b) *Public Notice Required Prior to ICR Submission to OMB.*

This section is not applicable because this is a rule-related ICR.

(c) *Consultations.*

The final rules were developed in consultation with individual plants and trade associations. The non-EPA persons consulted on the information collection activities are identified in Table 1.

TABLE 1. PERSONS CONSULTED ON THE INFORMATION COLLECTION ACTIVITIES

Contact	Organization	Telephone Number
Amy Blankenbiller	American Foundry Society	(202) 842-4849
Raymond Monroe	Steel Founders' Society of America	(847) 382-8240

(d) *Effects of Less Frequent Collection.*

If the relevant information were collected less frequently, the delegated permitting authority (State or EPA) would not be reasonably assured that a plant is in compliance with the standards.

(e) *General Guidelines.*

None of the guidelines in 5 CFR 1320.6 are being exceeded.

(f) *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).

*(g) Sensitive Questions.*

This section is not applicable because this ICR does not involve matters of a sensitive nature.

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

*(a) Respondents/NAICS Codes.*

Potential respondents under Subpart ZZZZZ are owners or operators of any existing or new iron foundry or steel foundry that is an area source of HAP emissions. The North American Industry Classification System (NAICS) codes for iron and steel foundries are 331511, 331512, and 331513. We estimate that a total of 427 area source foundries would be subject to the proposed NESHAP; no new area sources are projected during the 3 year period of this ICR.

*(b) Information Requested.*

*(i) Data Items, Including Recordkeeping Requirements.* Attachment 1, Source Data and Information Requirements, summarizes the data items, including recordkeeping and reporting requirements.

*(ii) Respondent Activities.* The respondent activities required by the proposed rule are identified in Tables 2A (for small foundries) and 2B (for large foundries) and are introduced in section 6(a).

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

*(a) Agency Activities.*

The Agency activities are provided in Table 3 and are introduced in section 6(c).

*(b) Collection Methodology and Management.*

Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs of the delegated authority. The monitoring reports submitted to the permitting authority are used for problem identification, as a check on source

operation and maintenance, and for compliance determinations. EPA is the delegated authority until the State agency is delegated authority to implement the final rule. Therefore, information contained in the reports submitted to the Regional Administrator will be entered into the Air Facility System (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.

*(c) Small Entity Flexibility.*

A small entity for this industry is defined by the Small Business Administration as a firm having no more than 500 employees. Approximately half (60 of 124) of the large iron and steel foundries (those with metal melting capacities greater than 10,000 tpy) are small businesses whereas 85 percent (259 of 303) of the small iron and steel foundries are small entities. The proposed rule includes a specific compliance option for small foundries that provides a maximum degree of operational flexibility, and the ICR requirements are the minimum necessary to demonstrate compliance. Our analyses show that the proposed NESHAP would not result in a significant economic impact on a substantial number of small entities. One small entity (which has a metal melting capacity greater than 10,000 tpy) may incur an economic impact that is greater than 3 percent of its revenue.

*(d) Collection Schedule.*

The specific frequency for each information collection activity within this request is shown in Tables 2A and 2B.

## **6. Estimating the Burden and Cost of the Collection**

*(a) Estimating Respondent Burden.*

The annual burden estimates for the proposed NESHAP are shown in Tables 2A and 2B. These numbers were derived from estimates based on EPA's experience with other standards. No burden estimates are provided for new area sources because no new facilities are expected during the 3-year period of this ICR.

*(b) Estimating Respondent Costs.*

The information collection activities for the proposed NESHAP are presented in Tables 2A and 2B.

(i) *Estimating Labor Costs.* Labor rates and associated costs are based on Bureau of Labor Statistics (BLS) data. Technical, management, and clerical average hourly rates for private industry workers in the foundry industry (NAICS 331500) were taken from the United States Department of Labor, Bureau of Labor Statistics, May 2006 available at <http://www.bls.gov>. Wages for occupational groups are used as the basis for the labor rates with a total compensation of \$34.33/hour for technical, \$46.66/hour for managerial, and \$15.79/hour for clerical. These rates represent salaries plus fringe benefits and do not include the cost of overhead. An overhead rate of 110 percent is used to account for these costs. The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$72.09, management at \$97.99, and clerical at \$33.16.

(ii) *Estimating Capital and Operations and Maintenance (O&M) Costs.* As shown in Table 2B, the estimate of capital costs for large foundries is \$59,620 with no O&M costs. This cost does not include the cost of any monitoring equipment because the required equipment is already in place. This cost does include the cost of a file cabinet for data storage.

(iii) *Capital/Startup vs. O&M Costs.* The estimate of capital/startup costs versus O&M costs is shown in Table 2B. No O&M costs would occur over the 3-year period of this ICR.

(iv) *Annualizing Capital Costs.* Table 2B shows an estimate of the annualized cost of capital to be \$8,490 per year.

(c) *Estimating Agency Burden and Cost.*

Because the information collection requirements were developed as an incidental part of standards development, no costs can be attributed to the development of the information collection requirements. Because reporting and recordkeeping requirements on the part of the respondents are required under the part 63 NESHAP General Provisions, no operational costs would be incurred by the Federal Government. Publication and distribution of the information are part of the Compliance Data System, with the result 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 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, as presented in Table 3.

The Agency labor rates are from the Office of Personnel Management (OPM) 2007 General Schedule which excludes locality rates of pay. These rates can be obtained from Salary Table 2007-GS available on the OPM website, [http://www.opm.gov/oca/06tables/html/gs\\_h.asp](http://www.opm.gov/oca/06tables/html/gs_h.asp). The government employee labor rates are \$14.60/hour for clerical (GS-6, Step 3), \$26.98 for technical (GS-12, Step 1), and \$36.36/hr for management (GS-13, Step 5). These rates were increased by 60 percent to include fringe benefits and overhead. The fully-burdened wage rates used to represent Agency labor costs are: clerical at \$ \$22.66; technical at \$47.97, and management at \$58.18.

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

There are 427 existing iron and steel foundries. No new sources are expected during the next 3 years. Consequently, the average number of respondents during the 3 year period of this ICR is 142.33. A total of 303 of the 427 facilities are foundries with a metal melting rate of 10,000 tpy or less and 124 have metal melting rates greater than 10,000 tpy. Consequently, the average number of small foundries during the 3-year period of this ICR is 101 and the average number of large foundries is 41.33.

The only components of the total annual responses for small foundries attributable to this ICR are two one-time initial notifications for each facility. Large foundries would be required to submit two one-time initial notifications; prepare an operation and maintenance plan and a startup, shutdown, and malfunction plan, and submit semiannual compliance reports. The number of total annual responses for Subpart ZZZZZ is estimated as: (142.33 annual average respondents × 1 notification) + (142.33 annual average respondents × 1 notification) + (50.1 annual average respondents × 1 deviations report) + (41.33 annual average respondents × 2 written plans) + (41.33 annual average respondents × 2 semiannual reports). Therefore, the number of total annual responses for Subpart ZZZZZ is 500.1.

*(e) Bottom Line Burden Hours and Cost Tables.*

*(i) Respondent tally.* The bottom line respondent burden hours and costs, presented in Table 2 are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column.

The average annual burden for the monitoring, recordkeeping, and reporting requirements in Subpart ZZZZZ for small foundries is 3,159 person hours with an annual average cost of \$220,591 with no capital and O&M costs. The average annual burden for the monitoring, recordkeeping, and reporting requirements in Subpart ZZZZZ for large foundries is 2,831 person hours with an annual average cost of \$197,704; the annualized capital cost is \$8,490 with no operation and maintenance costs. The average annual burden for the monitoring, recordkeeping, and reporting requirements in Subpart ZZZZZ for all iron and steel foundry area sources is 5,990 person hours with an annual average cost of \$418,295 with annualized capital costs of \$8,490 and no O&M costs.

(ii) *The Agency tally.* The total annual Federal Government cost is \$32,675 for 657.2 total annual hours. The bottom line Agency burden hours and costs presented in Tables 3 are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column.

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

(f) *Reasons for Change in Burden.*

This section does not apply because this is a new ICR.

(g) *Burden Statement*

The annual public reporting and recordkeeping burden for the collection of information is estimated to average 12 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 currently valid OMB control number. The OMB control numbers for EPA's regulations in 40 CFR part 63 are listed in 40 CFR part 9.

To comment on the Agency's need for this information the accuracy of the provided burden estimates, and any suggestions for minimizing respondent burden, including through the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2006-0039, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air Docket is (202) 566-1927. An electronic version of the public docket is available at <http://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 17<sup>th</sup> Street, NW, Washington, DC 20503, Attention Desk Officer for EPA. Please include the EPA Docket ID No. EPA-HQ-OAR-2006-0039 in any correspondence.

## **PART B**

This section is not applicable because statistical methods are not used in data collection associated with the final rules.

**TABLE 2A. ANNUAL RESPONDENT BURDEN AND COSTS FOR SMALL FOUNDRIES**

<b>Burden item</b>	<b>(A) Person- hours per occurrence</b>	<b>(B) No. of occurrences per respondent</b>	<b>(C) Person- hours per respondent (C=A*B)</b>	<b>(D) Respondents per year<sup>a</sup></b>	<b>(E) Technical person- hours per year (E=C*D)</b>	<b>(F) Management person-hours per year (E*0.05)</b>	<b>(G) Clerical person- hours per year (E*0.1)</b>	<b>(H) Cost<sup>b</sup>, \$</b>
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Read instructions	4	1	4	101	404	20.2	40.4	\$32,445
B. Required activities								
Scrap specifications	4	1	4	101	404	20.2	40.4	\$32,445
No methanol binder formulation <sup>c</sup>	0	0	0	0	0	0	0	\$0
Monthly rolling average calculation	0.25	12	3	101	303	15.15	30.3	24,353
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Initial notification of applicability	2	1	2	101	202	10.1	20.2	\$16,222
Notification of compliance status	4	1	4	101	404	20.2	40.4	\$32,445
Deviations report	1	1	1	50.1	50.1	2.51	5.01	4,023
Notification of construction/reconstruction	N/A							
Notification of anticipated startup	N/A							
Notification of actual startup	N/A							
Notification of special compliance requirements	N/A							
Request for compliance extension	N/A							
Notification of performance test	N/A							
Site specific test plan	N/A							
Notification of performance evaluation	N/A							
Quality assurance plan for CEMS/COMS	N/A							
NESHAP waiver request	N/A							
Startup, shutdown, and malfunction plan/reports	N/A							
Semiannual excess emissions reports	N/A							
5. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 4A							
C. Implement activities	See 4A							

Burden item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent	(C) Person- hours per respondent (C=A*B)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=C*D)	(F) Management person-hours per year (E*0.05)	(G) Clerical person- hours per year (E*0.1)	(H) Cost <sup>b</sup> , \$
D Develop record system	2	1	2	101	202	10.1	20.2	\$16,222
E. Time to enter information <sup>d</sup>	0.1	52	5.2	101	525.2	26.26	52.52	\$42,178
F. Time to transmit or disclose information	0.25	2	0.5	101	50.5	2.525	5.05	\$4,056
G. Time to adjust existing ways	2	1	2	101	202	10.1	20.2	\$16,222
F. Time to train personnel <sup>e</sup>	NA							
G. Time for audits	N/A							
<b>TOTAL LABOR BURDEN AND COST</b>							<b>3,159</b>	<b>\$220,591</b>
						<b>hrs</b>		
Annualized cost of capital								0
Operation and maintenance (O&M)								0
Total (capital recovery plus O&M)								0

N/A = not applicable.

<sup>a</sup> There are 427 existing iron and steel foundries that area sources. No new sources are projected during the 3-year term of this ICR. Therefore, the average number of total respondents per year is 142.33. A total of 303 of the 427 facilities are small foundries and 124 are large foundries. Consequently, the average number of small foundries during the 3-year period of this ICR is 101 and the average number of large foundries is 41.33. No new sources are expected during the next 3 years. For the purposed of deviation reports, 1 report per year is estimated for one-half (50.5) of the 101 respondents per year.

<sup>b</sup> This ICR uses the following labor rates: The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$72.09, management at \$97.99, and clerical at \$33.16. Technical, management, and clerical average hourly rates for private industry workers in the foundry industry (NAICS 331500) were taken from the United States Department of Labor, Bureau of Labor Statistics, May 2006 available at <http://www.bls.gov>. The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> No burden would be incurred for this requirement because all small area source foundries are already meeting the no methanol requirement.

<sup>d</sup> Small foundries must record information to demonstrate compliance with pollution prevention management practices for metallic scrap and binder formulations.

**TABLE 2B. ANNUAL RESPONDENT BURDEN AND COSTS FOR LARGE FOUNDRIES**

<b>Burden item</b>	<b>(A) Person- hours per occurrence</b>	<b>(B) No. of occurrences per respondent</b>	<b>(C) Person- hours per respondent (C=A*B)</b>	<b>(D) Respondents per year<sup>a</sup></b>	<b>(E) Technical person- hours per year (E=C*D)</b>	<b>(F) Management person-hours per year (E*0.05)</b>	<b>(G) Clerical person- hours per year (E*0.1)</b>	<b>(H) Cost<sup>b</sup>, \$</b>
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Read instructions	8	1	8	41.33	330.6	16.5	33.1	\$26,553
B. Required activities								
Scrap material specifications	4	1	4	41.33	165.3	8.3	16.5	\$13,277
Prepare operation & maintenance plan	8	1	8	41.33	330.6	16.5	33.1	\$26,553
No methanol binder formulation <sup>c</sup>	4	1	4	0.67	2.68	0.134	0.268	\$215
Initial performance tests <sup>d</sup>	0	0	0	0	0.0	0.0	0.0	\$0
Daily measurement of baghouse pressure drop/periodic inspections or daily check of electrostatic power supply, weekly visual emissions check, monthly inspection of capture system, operation and maintenance of control devices <sup>d</sup>	0	0	0	0	0.0	0.0	0.0	\$0
Prepare emissions averaging plan and make monthly compliance calculation <sup>d</sup>	0	0	0	0	0	0	0	0
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Initial notification of applicability	4	1	4	41.33	165.3	8.3	16.5	\$13,277
Notification of compliance status	8	1	8	41.33	330.6	16.5	33.1	\$26,553
Notification of construction/reconstruction	N/A							
Notification of anticipated startup	N/A							
Notification of actual startup	N/A							
Notification of special compliance requirements	N/A							
Request for compliance extension	N/A							
Notification of performance test <sup>d</sup>	1	1	1	41.33	41.3	2.1	4.1	\$3,319
Site specific test plan <sup>d</sup>	0	0	0	0	0.0	0.0	0.0	\$0
Notification of performance evaluation	N/A							
Quality assurance plan for CEMS/COMS	N/A							

Burden item	(A) Person- hours per occurrence	(B) No. of occurrences per respondent	(C) Person- hours per respondent (C=A*B)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=C*D)	(F) Management person-hours per year (E*0.05)	(G) Clerical person- hours per year (E*0.1)	(H) Cost <sup>b</sup> , \$
NESHAP waiver request	N/A							
Startup, shutdown, and malfunction plan/reports	4	1	4	41.33	165.3	8.3	16.5	\$13,277
Semiannual excess emissions reports	2	2	4	41.33	165.3	8.3	16.5	\$13,277
5. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 4A							
C. Implement activities	See 4A							
D. Develop record system	4	1	4	41.33	165.3	8.3	16.5	\$13,277
E. Time to enter information	0.5	52	26	41.33	1074.6	53.7	107.5	\$86,298
F. Time to transmit or disclose information	0.25	2	1	41.33	20.7	1.0	2.1	\$1,660
G. Time to adjust existing ways	2	1	2	41.33	82.7	4.1	8.3	\$6,638
F. Time to train personnel <sup>f</sup>	4	1	4	41.33	165.3	8.3	16.5	\$13,277
G. Time for audits	N/A							
<b>TOTAL LABOR BURDEN AND COST</b>							<b>2,831</b>	<b>\$197,704</b>
						<b>hrs</b>		
Annualized cost of capital <sup>g</sup>								<b>\$8,490</b>
Operation and maintenance (O&M)								<b>0</b>
Total (capital recovery plus O&M) <sup>g</sup>								<b>\$8,490</b>

N/A = not applicable.

<sup>a</sup> There are 427 existing iron and steel foundries that area sources. No new sources are projected during the 3-year term of this ICR. Therefore, the average number of respondents per year is 142.33. A total of 303 of the 427 facilities are small foundries and 124 are large foundries. Consequently, the average number of small foundries during the 3-year period of this ICR is 101 and the average number of large foundries is 41.33.

<sup>b</sup> This ICR uses the following labor rates: The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$72.09, management at \$97.99, and clerical at \$33.16. Technical, management, and clerical average hourly rates for private industry workers in the foundry industry (NAICS 331500) were taken from the United States Department of Labor, Bureau of Labor Statistics, May 2006 available at <http://www.bls.gov>. The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> Two large area source foundries (2 foundries over 3 years = 0.67 foundries per year) are expected to have to change formulations to meet the no methanol requirement.

<sup>d</sup> These activities are not expected to occur during the first 3 years of this ICR.

<sup>e</sup> Large foundries must record information to demonstrate compliance with pollution prevention management practices for metallic scrap and binder formulations and information to demonstrate compliance with monitoring; inspection; operation and maintenance; startups, shutdowns, and malfunctions; and other requirements of the General Provisions (40 CFR part 63, subpart A).

<sup>f</sup> Large foundries are expected to monitor visible emissions using a trained employee.

<sup>g</sup> Based on capital cost of \$59,620 for file storage cabinets, 7 percent interest, and 20-year equipment life (capital recovery factor = 0.142). No costs for monitoring equipment are estimated because foundries are already equipped with continuous parameter monitoring systems required for wet scrubbers and are expected to select manual monitoring options for other types of control devices.

**TABLE 3. ANNUAL BURDEN AND COST TO THE AGENCY**

<b>Burden Item</b>	<b>(A) Person hours per occurrence</b>	<b>(B) Occurrences per respondent</b>	<b>(C) Plants per year <sup>a</sup></b>	<b>(D) Technical hours/year (D=A*B*C)</b>	<b>(E) Management hours/year (E=0.05*D)</b>	<b>(F) Clerical-hours/year (F=0.1*D)</b>	<b>(G) Cost<sup>b</sup>, \$</b>
Report Review:							
Initial notification of applicability	1	1	142.33	142.33	7.1	14.2	7,564
Deviation reports for small foundries	1	1	50.1	50.1	2.5	5.01	2,420.29
Startup, shutdown, malfunction plan/report	2	1	142.33	142.33	7.1	14.2	7,564
Notification of compliance status	2	1	142.33	142.33	7.1	14.2	7,564
Semiannual excess emissions report	2	1	142.33	142.33	7.1	14.2	7,564
<b>TOTAL BURDEN AND COST</b>				<b>657.2 hours</b>			<b>\$32,675.29</b>

<sup>a</sup> There are 427 existing iron and steel foundries that are area sources. No new sources are projected during the 3-year term of this ICR. Therefore, the average number of respondents per year is 142.33. No travel is expected.

<sup>b</sup> This ICR uses the following average hourly labor rates: 58.18 for managerial (GS-13, Step 5, \$36.36 x 1.6), \$43.14 (GS-12, Step 1, \$29.98 x 1.6) for technical and \$22.66 (GS-6, Step 3, \$14.16 x 1.6) for clerical. These rates are from the Office of Personnel Management (OPM) A2007 General Schedule<sup>®</sup> which excludes locality rates of pay.



**ATTACHMENT 1. INFORMATION REQUIREMENTS**

<b>Requirement for new and existing sources</b>	<b>Citation for small foundries</b>	<b>Citation for large foundries</b>	<b>Citation for NESHAP general provisions</b>
CPMS for wet scrubber	NA	§63.10897(a)	NA
CPMS for electrostatic precipitator or record parameters once per shift	NA	§63.10897(b)	NA
BLDS or CPMS and inspections or measure parameter once per day and inspections; BLDS for new sources.	NA	§63.10897(c), (d)	NA
Monthly capture system inspections	NA	§63.10897(e)	NA
Semiannual opacity test or weekly check for fugitive emissions from foundry operations	NA	§63.10897(g)	NA
CMS performance evaluation	NA	NA	
Metal melting furnaces and fugitive emissions	NA	§63.10898	40 CFR 63.7
CMS performance evaluation	NA	NA	40 CFR 63.8(e)(3)
Notification of applicability	§63.10890(b)	§63.10900(a), Table 3	40 CFR 63.9(b)(2)
Notification of construction/ reconstruction <sup>1</sup>	§63.10890(f)	§63.10900(a), Table 3	40 CFR 63.9(b)(5)
Notification of special compliance requirements <sup>1</sup>	§63.10890(f)	§63.10900(a), Table 3	40 CFR 63.9(d)
Notification of performance test	NA	§63.10900(a), Table 3	40 CFR 63.9(c)
Notification of opacity/VE observations	NA	§63.10900(a), Table 3	40 CFR 63.9(f)
Additional CMS notifications	NA	NA	40 CFR 63.9(g)
Notification of compliance status	§63.10890(c)	§63.10900(a), Table 3	40 CFR 63.9(h)(1)
Notification of changes in information <sup>1</sup>	§63.10890(f)	§63.10900(a), Table 3	40 CFR 63.9(j)
Scrap management material specifications	§63.10885(b),(c)		NA
Operation and maintenance plan	NA	§63.10896(a)	NA
Startup, shutdown, and malfunction plan	NA	§63.10900(a), Table 3	40 CFR 63.6(e)(3)
Performance test plan	NA	§63.10900(a), Table 3	40 CFR 63.7(c)(2)
CMS quality control plan	NA	§63.10900(a), Table 3	40 CFR 63.8(d)
CMS performance evaluation test plan	NA	NA	40 CFR 63.8(e)(3)
Information to support notifications	§63.10890(e)(1)	§63.10900(a), Table 3	40 CFR 63.10(b)(2)
Material specifications	§63.10890(e)(2)	§63.10899(a)(1)	NA
Nonmethanol binder chemical formulations	§63.10890(e)(3)	§63.10899(a)(2)	NA
Annual quantity and composition of each HAP-containing chemical binder or coating material	§63.10899(e)(4)	§63.10899(a)(3)	NA
Operation and maintenance plan	NA	§63.10899(a)(4)	NA
If applicable, emissions averaging plan	NA	§63.10899(a)(5)	NA
Baghouse monitoring /inspections or BLDS	NA	§63.10899(a)(6)	NA
Capture system inspections and repairs	NA	§63.10899(a)(7)	NA
Manufacturer's CPMS specifications/instructions	NA	§63.10899(a)(8)	NA
Semiannual excess emissions/deviation reports	§63.10890(f)	§63.10899(b), Table 3	40 CFR 63.10(e)(3)
Initial performance test report	NA	§63.10900(a), Table 3	40 CFR 63.7(e)(1)
CMS performance evaluation report	NA	NA	40 CFR 63.8(e)(5)
SSM reports	NA	§63.10900(a), Table 3	40 CFR 63.6(e)(3)

<sup>1</sup> Requirement is not expected to occur during the 3-year term of this ICR