

**Table 1. Annual Respondent Burden and Cost: NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (40 CFR Part 63, Subpart XXX)**

Burden item	(A) Person-hours per occurrence	(B) No. of occurrence per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(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,\$ <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements <sup>c</sup>								
A. Read instructions	Included in 5C							
B. Required activities	Included in 5C							
C. Create Information	Included in 5C							
D. Gather Existing Information	Included in 5C							
E. Write report <sup>c, d</sup>								
i. Initial notifications	N/A							
ii. Notification of reconstruction/modification	N/A							
iii. Notification of annual performance test	2	1	2	1	2.0	0.1	0.20	\$146.75
iv. Notification of opacity and visible observations		1	2	1	2.0	0.1	0.20	\$146.75
v. Report of performance test results/opacity observations	5	1	5	1	5.00	0.25	0.50	\$367.28
vi. Periodic startup, shutdown and malfunction reports	10	2	20	1	20.00	1.00	2.00	\$1,467.50

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vii. Capture hood inspection report	4	2	8	1	8.00	0.40	0.80	\$587.00
viii. Summary report of maintenance records	4	2	8	1	8.00	0.40	0.80	\$587.00
ix. Fugitive dust operations report	4	2	8	1	8.00	0.40	0.80	\$587.00
x. Quarterly excess emissions reports	4	4	16	1	16.00	0.80	1.60	\$1,174.00
xi. Annual compliance status certification	2	1	2	1	2.00	0.10	0.20	\$146.75
Reporting Subtotal					71.0	3.55	7.10	\$5,210.03
5. Recordkeeping Requirements								
A. Read instructions	Included in 5C							
B. Plan activities	10	1	10	1	10.00	0.50	1.00	\$733.75
C. Implement activities: <sup>e, f</sup>								
i. Control devices:								
-Annual Performance tests for the control devices associated with submerged arc furnaces	50	1	50	1	50.00	2.50	5.00	\$3,668.75
-Baghouse monitoring includes:								
Daily	0.5	350	175	1	175.00	8.75	17.5	\$12,840.63
Weekly	0.1	50	5	1	5.00	0.25	0.50	\$367.28
Monthly	0.1	12	1.2	1	1.20	0.06	0.12	\$88.05
Quarterly	0.1	4	0.4	1	0.40	0.02	0.04	\$29.41
Semiannually	0.1	2	0.2	1	0.20	0.01	0.02	\$14.68

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-Parameter monitoring: fan motor amperes, damper positions and pressure drop	0.1	1050	105	1	105.00	5.25	10.50	\$7,704.38
ii. Monthly capture system inspection	2	12	24	1	24.00	1.20	2.40	\$1761.00
iii. Opacity violation/scrubber	2	1	2	1	2.00	0.01	0.02	\$14.68
iv. Opacity violation/baghouse	2	20	40	1	40.00	2.00	4.00	\$2,935.00
v. Monitoring violation - capture system	2	12	24	1	24.00	1.20	2.40	\$1761.00
D. Develop record system <sup>c, g</sup>	N/A							
E. Time to enter and transmit information	Included in 5C							
F. Time to train personnel	N/A							
G. Time to adjust existing ways to comply with previously applicable requirements	N/A							
H. Time to disclose information	N/A							
I. Time for audits	N/A							
Recordkeeping subtotal					436.80	21.82	43.68	\$32,050.68
Labor hours and cost					507.80	25.39	50.78	\$37,260.71
TOTAL LABOR BURDEN AND COST (Rounded)					583.97			\$37,261

**Assumptions:**

<sup>a</sup> There is only one ferroalloy production facility currently subject to the standard. We have assumed that no additional respondents will become subject to this regulation since no industry growth is expected in the next three years.

<sup>b</sup> This ICR uses the following labor rates: \$95.32 per hour for Executive, Administrative, and Managerial labor; \$64.60 per hour for Technical labor, and \$40.09 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2003, ATable 10. Private industry, by occupational and industry group. @ The rates are from column 1, ATotal compensation. @ The rates are from column 1, ATotal compensation. @ These rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed that the source has complied with the initial notification requirements and the initial compliance demonstration requirements since the effective date of the rule has passed. In addition, we have assumed that the source has already developed its record system including the startup, shutdown and malfunction plan; the fugitive dust plan; and the control equipment/maintenance plan.

<sup>d</sup> Periodic reports include: quarterly emissions reports and semiannual reports that address the requirements for opacity-related reports; performance test results reports; startup, shutdown and malfunction reports; capture hood inspection reports; and fugitive dust operations reports.

<sup>e</sup> The types of monitoring activities required by this NESHAP regulation include: 1) monitoring of baghouse systems on a daily (visible observations and pressure drop across the baghouse), weekly (inspection of dust hoppers), monthly (inspection of bags cleaning mechanism), quarterly (inspection of baghouse integrity and bags tension) and semiannual (inspection of fans for wear) basis; 2) the implementation of a bag leak detection systems; 3) average hourly scrubber pressure drop (automatic device is used) monitoring for venturi scrubbers; and 4) either monitoring of control system fan motor ampares and capture system damper positions once per shift, or monitoring of volumetric flow rate through each separately ducted hood, or at the inlet of the air pollution control device using a continuous monitoring system and of the capture system damper positions once per shift, if the source is subject to the shop opacity standard.

<sup>f</sup> Sources are required to conduct the annual performance test for the air pollution control devices and vent stacks to determine particulate matter concentration and volumetric flow rate to demonstrate compliance with the emission standard. Reference Method 5 is used to determine particulate matter concentration and volumetric flow rate for baghouses without stack. Sources are also required to conduct initial opacity observations of the shop building using Reference Method 9 to demonstrate compliance with the opacity standards.

<sup>g</sup> Sources are required to maintain records of: 1) process or control device parameters; 2) bag leak detention systems; 3) maintenance plan for air pollution control devices (e.g., capture system and venturi scrubbers); 4) certification that monitoring devices are accurate; and 5) the implementation and corrective actions taken related to the startup, shutdown and malfunction plan and the fugitive dust control plan.

**Table 2. Annual Burden and Cost for the Federal Government: NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (40 CFR Part 63, Subpart XXX)**

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	(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, \$ <sup>a</sup>
A. Review reports: <sup>c &amp; d</sup>								
i. Initial Notifications	N/A							
ii. Notification of reconstruction/modification	N/A							
iii. Notification of Performance Test	1	1	1	1	1.00	.050	0.10	\$45.49
iv. Report of performance test results/opacity observations	5	1	5	1	5.00	0.25	0.50	\$227.44
v. Semiannual summary reports	10	2	20	1	20.00	1.00	2.00	\$909.76
vi. Quarterly excess emissions reports	2	4	8	1	8.00	0.40	0.80	\$363.90
xi. Annual compliance status certification	2	1	2	1	2.00	0.10	0.20	\$90.98
Total Annual Cost						91		\$1,637.57
TOTAL ANNUAL COST (rounded)								\$1,638

**Assumptions:**

<sup>a</sup> There is only one ferroalloy production facility currently subject to NESHAP, subpart XXX. We have assumed that no additional respondents will become subject to this regulation.

<sup>b</sup> Costs are based on the following hourly rates: Managerial at \$54.66 (GS-13, Step 5, \$34.16 x 1.6); Technical at \$40.56 (GS-12, Step 1, \$25.35 x 1.6); Clerical at \$21.95 (GS-6, Step 3, \$13.72 x 1.6). These rates are from the Office of Personnel Management (OPM) A2004 General Schedule@ which excludes locality rates of pay.

<sup>c</sup> We have assumed that the source has comply with the initial notification requirements and the initial compliance demonstration requirements since the effective date of the rule has passed. In addition, we have assumed that the source has already developed its record system including the startup, shutdown and malfunction plan; the fugitive dust plan; and the control equipment/maintenance plan.

<sup>d</sup> Periodic reports include: quarterly emissions reports and semiannual reports that address the requirements for opacity-related reports; performance test results reports; startup/shutdown/malfunction reports; capture hood inspection reports; and fugitive dust operations reports.

N/A = Not applicable.