

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Primary and Secondary Emissions from Basic Oxygen Furnaces
(40 CFR part 60, subparts N and Na) (Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Primary and Secondary Emissions from Basic Oxygen Furnaces (40 CFR Part 60, Subparts N and Na) (Renewal), EPA ICR Number 1069.09, OMB Control Number 2060-0029

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for the regulations published at 40 CFR part 60, subparts N and Na were proposed on June 11, 1973, and promulgated on March 8, 1974. These regulations apply to each basic oxygen process furnace (BOPF) in an iron and steel plant commencing construction, modification or reconstruction after the date of a proposal. An opacity limit was promulgated on April 13, 1978, as a supplement to the mass standard. On January 20, 1983, amendments to the Standards of Performance for Primary Emissions from Basic Oxygen Process Furnaces, merged with Standards of Performance for Secondary Emissions from Basic Oxygen Process Steelmaking Facilities (Subpart Na). Subpart Na is applicable to any top-blown BOPF, hot metal transfer station or skimming station for which construction, reconstruction, or modification commenced after January 20, 1983. These amendments were promulgated on January 2, 1986. This information is being collected to assure compliance with 40 CFR part 60, subparts N and Na.

The monitoring, recordkeeping, and reporting requirements outlined in these rules are similar to those required for other NSPS regulations. Consistent with the NSPS General Provisions (40 CFR part 60, subpart A), respondents would submit initial notifications, conduct performance tests and report test results for the primary emission control devices, and submit periodic reports. Sources also must develop and implement a Startup, Shutdown, and Malfunction Plan (SSMP) and submit semiannual reports of any event where the procedures in the plan were not followed. These notifications, reports, and records are essential in determining compliance, and are required of all sources 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.

We have determined that there are approximately five respondents which are currently subject to NSPS, subparts N and Na. Furthermore, we have assumed that one existing BOPF

shop, which is not currently a respondent, becomes a respondent over the next three years due to modification/reconstruction related to its furnaces, skimming stations and/or hot metal transfer stations. This information was confirmed with the rule lead addressing this source category at the Office of Air Quality Planning and Standards (OAQPS).

For the renewal of this Information Collection Request (ICR), OMB did not request that EPA address any “Terms of Clearance.”

The burden to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost of the NSPS for Primary and Secondary Emissions from Basic Oxygen Furnaces (40 CFR Part 60, Subparts N and Na) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors, and may be found in Table 2: Annual Burden and Cost to the Federal/State Government of the NSPS for Primary and Secondary Emissions from Basic Oxygen Furnaces (40 CFR Part 60, Subparts N and Na) (Renewal).

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 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, particulate matter emissions from primary and secondary emissions from basic oxygen process furnaces cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subparts N and Na.

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 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 ensure that the pollution control devices are properly installed and operated and that the 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. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 60, subparts N and Na.

3(a) Non-duplication

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 (73 FR 31088) on May 30, 2008. No comments were received on the burden published in the Federal Register.

3(c) Consultations

After reviewing our internal data sources and discussing the industry growth rate with the Agency industry experts in the previous renewal, we have determined that additional consultations with industry are inappropriate for this ICR renewal.

These standards were developed with the participation and/or consultation with industry representatives. In addition, the Agency performed additional reviews to determine additional burden reduction opportunities and as a result of recent rule-making (40 CFR part 60, subpart FFFFF) affecting this source category.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

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 likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 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 the five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or non-existence 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

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are basic oxygen process furnace shops at iron and steel plants with furnaces, skimming stations and/or hot metal transfer stations. The United States Standard Industrial Classification (SIC) codes for the respondents affected by 40 CFR part 60, subparts N and Na and the corresponding North American Industry Classification System (NAICS) codes are listed below:

SIC Code and Description	Corresponding NAICS Code and Description
3312 - Steel Works, Blast Furnaces (Including Coke Ovens), and Rolling Mills (except coke ovens not integrated with steel mills)	331111 - Iron and Steel Mills; 31221 – Rolled Steel Shape Manufacturing
3315 - Steel Wiredrawing and Steel Nails and Spikes (steel, wire drawing)	331222 - Steel Wire Drawing
3316 - Cold-Rolled Steel Sheet, Strip and Bars	331221 - Rolled Steel Shape Manufacturing
3317 - Steel Pipe and Tubes	33121 - Iron and Steel Pipe and Tube Manufacturing from Purchased Steel

4(b) Information Requested

(i) Data Items

All data in this ICR that are recorded and/or reported are required by NSPS for Primary and Secondary Emissions from Basic Oxygen Furnaces (40 CFR part 60, subparts N and Na) (Renewal).

A source must make the following reports:

Notification Reports for 40 CFR Part 60, Subparts N and Na	
Notification of construction/reconstruction	60.7(a)(1)
Notification of actual startup	60.7(a)(3)
Notification of physical or operational change	60.7(4)
Notification of monitoring system performance commencement	60.7(5)
Performance test results	60.8 (a)
Notification of performance test	60.8(d)
Demonstration of continuous monitoring system	60.7(a)(5)
Semiannual compliance reports of all measurements over any 3-hour period that average more than 10% below the average level maintained during the most recent performance test in which the facility demonstrated compliance with the standard	60.7(c), 60.143(c-e)

Reports for 40 CFR Part 60, Subparts N and Na	
Report of performance test results	60.8 (a)
Semiannual compliance reports of all measurements over any 3-hour period that average more than 10% below the average level maintained during the most recent performance test in which the facility demonstrated compliance with the standard	60.7(c), 60.143(c-e)

A source must maintain the following records:

Recordkeeping for 40 CFR Part 60, Subparts N and Na	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative.	60.7(b)
Emission test results, continuous monitoring system data, performance test results and other data needed to determine compliance with mass and visible emission limits.	60.7(f), 60.145a
Time and duration of each steel production cycle.	60.143(a)
Record the time and duration of the rates or levels of any diversion of exhaust gases from the main stack servicing the BOPF.	60.143(a)
Record the various rates or levels of exhaust ventilation at each phase of the cycle through each duct of the secondary emission capture	60.143a(a)

Recordkeeping for 40 CFR Part 60, Subparts N and Na	
system.	
Record the time and duration of the visible emission data sets.	60.145a(d)
Record the particulate matter concentration (i.e., opacity levels) exiting the control device and discharge into the atmosphere.	60.142(a-b)
Record the pressure loss through the venturi constriction of the scrubber continuously.	60.143(a)(1)
Record the water supply pressure to the venturi scrubber control equipment continuously.	60.143(a)(2)
Records are required to be retained for 2 of years.	60.7(f)

Electronic Reporting

Currently, respondents are using monitoring equipment that automatically records parameter data (e.g., flow rate and pressure drop). Although personnel at the affected facility must evaluate the data, this internal automation has significantly reduced the burden associated with monitoring and recordkeeping at the 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 continuous monitoring system for pressure loss through the constriction of the venturi scrubber and the water supply pressure to the venturi scrubber.
Perform an initial performance test, Reference Method 5 for determination of particulate matter concentration, Method 9 determination of opacity, Method 2 for determination of the various rates of exhaust ventilation, and repeat performance tests.
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.

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 Air Facility System (AFS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the EPA 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

There are no small entities (i.e., small businesses) affected by this regulation since basic oxygen process furnaces are located at iron and steel facilities which are large and very complex facilities.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Respondent Burden and Cost: NSPS for Primary and Secondary Emissions from Basic Oxygen Furnaces (40 CFR Part 60, Subparts N and Na) (Renewal).

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 sources subject to NSPS, subparts N and Na, which are 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 1,896 (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	\$97.46	(\$46.41 + 110%)
Technical	\$83.71	(\$39.86 + 110%)

Clerical \$42.55 (\$20.26 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 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 (O&M) costs are the ongoing costs to maintain the monitor(s) 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/ Startup 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)
Flow meters to measure exhaust gas flow rate	\$18,000	1	\$18,000	\$900	5.33	\$4,797
Flow meters to measure pressure flow rate	0	0	0	\$900	4.00	\$3,600
Total			\$18,000			\$8,397

The total capital/startup costs for this ICR are \$18,000. This cost is based on one BOPF shop incurring a startup cost to monitor the exhaust gas flow rate at the secondary emission control system, as a result of modifications to the BOPF hot metal transfer system. Startup cost is based on the Continuous Emission Monitoring System Cost Model, Version 3.0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$8,397. This cost is based on the O&M costs being 5 percent of the flow monitor cost. We have also assumed that three operating BOF shops subject to this rule use venturi scrubbers as primary emission control systems and have reportable low pressure. The other operating BOF shops subject to this rule

use an electrostatic precipitator as the primary emission control. This is the total of column G.

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 \$26,397.

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 \$2,755.

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

Managerial	\$56.02	(GS-13, Step 5, \$35.01 x 1.6)
Technical	\$41.57	(GS-12, Step 1, \$25.98 x 1.6)
Clerical	\$22.50	(GS-6, Step 3, \$14.06 x 1.6)

These rates are from the Office of Personnel Management (OPM) "2005 General Schedule" which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: (use the complete title of the table), 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 5 existing respondents (i.e., BOPF shops) will be subject to the standard. It is estimated that an additional BOPF shop will become subject to these rules due to modification of its operations over the three-year period of this ICR. The overall average number of respondents, as shown in the table below is 5.3 per year.

The number of respondents is calculated using the following table which 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	(B) Number of	(C) Number of Existing	(D) Number of	(E) Number of

Number of Respondents					
	New Respondents¹	Existing Respondents	Respondents That Keep Records but Do Not Submit Reports	Existing Respondents That Are Also New Respondents	Respondents (E=A+B+C-D)
1	0.33	5	NA	0	5.33
2	0.33	5	NA	0	5.33
3	0.33	5	NA	0	5.33
Average	0.33	5	NA	0	5.33

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 5 (rounded).

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 modification/reconstruction	0.33	1	NA	0.33
Notification of Performance Test	0.33	1	NA	0.33
Report results of performance test	0.33	1	NA	0.33
Semiannual reports	5.33	2	10.66	10.66
			Total	11.65

The number of Total Annual Responses is 12 (rounded). The total annual labor is 1,896 hours (rounded). Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost: NSPS for Primary and Secondary Emissions from Basic Oxygen Furnaces (40 CFR Part 60, Subparts N and Na) (Renewal), attached.

The total annual capital/startup and O&M costs to the regulated entities are \$26,397. 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 68 labor hours at a cost of \$2,755 (rounded). See Table 2: Annual Agency Burden and Cost, NSPS for Primary and Secondary Emissions from Basic Oxygen Furnaces (40 CFR Part 60, Subparts N and Na) (Renewal), 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 Hours Requested is 1,896 hours. The total annual labor costs are \$153,043. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NSPS for Primary and Secondary Emissions from Basic Oxygen Furnaces (40 CFR Part 60, Subparts N and Na) (Renewal), attached. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 158 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$26,397. 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 68 labor hours at a cost of \$2,755. See Table 2: Annual Agency Burden and Cost: NSPS for Primary and Secondary Emissions from Basic Oxygen Furnaces (40 CFR Part 60, Subparts N and Na (Renewal)), attached.

6(f) Reasons for Change in Burden

There is no change in the labor hours to the respondents in this ICR compared to the previous ICR. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for respondents is very low, negative, or non-existent. Therefore, the labor hours in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR. There is a minor change to the cost figures, since the previous ICR rounded to the nearest \$1,000; this ICR presents cost figures which differ by \$397 from the previous ICR due to using exact figures instead of rounding.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information

is estimated to average 158 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-2008-0374. 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 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 docket center is (202) 566-1927. 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-2008-0374 and OMB Control Number 2060-0029 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 for Primary and Secondary Emissions from Basic Oxygen Furnaces (40 CFR Part 60, Subparts N and Na) (Renewal)

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	1	1	1	0.33	0.33	0.02	0.03	\$30.85
B. Required Activities								
Performance Test ^c	194	1	194	0.33	64.02	3.20	6.40	\$5,943.30
Repeat of Performance Test ^c	194	1	194	0	0.00	0.00	0.00	\$0.00
Daily monitoring of emissions and operations	Included in 5E							
C. Create Information	Included in 4B and 5E							
D. Gather Existing Information	Included in 4B and 5E							
E. Write report								
Notification of modification or reconstruction ^c	2	1	2	0.33	0.66	0.03	0.07	\$61.14
Notification of Performance Test ^{a, c}	2	1	2	0.33	0.66	0.03	0.07	\$61.14
Performance Test Results ^c	32	1	32	0.33	10.56	0.53	1.10	\$982.44

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
Semiannual Reports of Excess Emissions and Monitoring Systems Performance ^d	10	2	20	5.33	106.60	5.33	10.66	\$9,896.53
SUBTOTAL Reporting					182.83	9.14	18.33	\$16,975.40
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: ^e								
Records of CMS operating parameters:								
- Exhaust ventilation rate ^f	0.25	365	91.25	5.33	486.36	24.32	48.64	\$45,153.06
- Across the venturi scrubber (i.e., pressure drop and water supply pressure) ^g	0.25	365	91.25	4.00	365.00	18.25	36.50	\$33,885.88
Records of performance Test	Included in 4B							
Records of duration of each steel production cycle, and time and duration of any diversion of exhaust gases from the main stack serving the BOPF	0.25	365	91.25	5.33	486.36	24.32	48.64	\$45,153.06
Recalibrate and check	8	1	8	5.33	42.64	2.13	4.26	\$3,958.24

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
monitoring devices ^h								
F. Time to Train Personnel: - Certification of opacity observer ⁱ	8	2	16	5.33	85.28	4.26	8.53	\$7,916.92
G. Time for Audits	N/A							
SUBTOTAL Recordkeeping					1,465.64	73.28	146.57	\$136,067.16
Subtotal Labor Burden					1,648.47	82.42	164.85	\$153,042.56
TOTAL LABOR BURDEN AND COST					1,895.74 1,896 (rounded)			\$153,042.56

Assumptions:

^a We have determined that there are five respondents (i.e., BOPF shops) which are currently subject to NSPS Subparts N and Na. Furthermore, we have assumed that one existing respondent over the next three years will become subject to NSPS Subpart Na due to modifications/reconstruction related to its furnaces, skimming stations and/or hot metal transfer stations.

^b These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 19, 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% to account for the benefit packages available to those employed by private industry which are technical at \$83.71, management at \$97.46, and clerical at \$42.55.

^c We have assumed that the new respondent conducting modifications at its furnaces, skimming stations and/or hot metal transfer stations will comply with the notifications requirements of the rule and conduct a successful performance test.

^d We have assumed that all five existing respondents will submit semiannual reports with all measurements over any three hour period (e.g., of low pressure) that average more than 10 percent below the averages during the most recent performance test.

^e We have assumed that the respondents are operating 365 days per year, as specified in the NSPS review document.

^f We have assumed that all five existing respondents and the new respondent would need to meet the monitoring requirements.

^g We have assumed that four existing respondents subject to this rule use venturi scrubbers as primary emission control systems and have reportable low pressure. The other existing respondents and the new respondent subject to these rules use an electrostatic precipitator as the primary emission control.

^h We have assumed that respondents subject to this rule will have to recalibrate monitoring devices on an average of twice a year to keep them functioning well. Sources are required to recalibrate and check monitoring devices at least annually and at other times, if required.

ⁱ This burden includes the indirect costs to respondents to provide certification to one observer provided by the state enforcement agency or its contractor.

Certification of opacity observers is valid for a six month period according to Method K.

TABLE 2: Annual Burden and Cost to the Federal/State Government: NSPS for Primary and Secondary Emissions from Basic Oxygen Furnaces (40 CFR Part 60, Subparts N and Na) (Renewal)

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences per plant per year	(C) Person hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical hours per year (E=CxD)	(F) Management hours per year (F=0.05xE)	(G) Clerical-person hours per year (G=0.1xE)	(H) Cost, \$ ^b
Report Review: New Sources ^c								
Notification of performance test ^c	2	1	2	0.33	0.66	0.03	0.07	\$30.70
Report of performance test results ^c	8	1	8	0.33	2.64	0.13	0.26	\$122.88
Notification of modification/reconstruction ^c	2	1	2	0.33	0.66	0.03	0.07	\$30.70
Report Review: Existing and New Sources ^d								
Semiannual reports of excess emissions and monitoring systems performance	5	2	10	5.33	55.33	2.77	5.53	\$2,570.68
Subtotal					59.29	2.96	5.93	\$2,754.96
TOTAL ANNUAL COST						68.18		\$2,754.96

Assumptions:

^a We have determined that there are five respondents (i.e., BOPF shops) which are currently subject to NSPS Subparts N and Na. Furthermore, we have assumed that one existing BOPF shop over the next three years will become subject to NSPS Subpart Na due to modifications/reconstruction related to its furnaces, skimming stations and/or hot metal transfer stations.

^b This cost is based on the average hourly labor rate as follows: Managerial at \$56.02 (GS-13, Step 5, \$35.01 x 1.6), Technical at \$41.57 (GS-12, Step 1, \$25.98 x 1.6), and Clerical at \$22.50 (GS-6, Step 3, \$14.06 x 1.6). These rates are from the Office of Personnel Management (OPM) “2005 General Schedule” which excludes locality rates of pay.

^c We have assumed that a respondent conducting modifications at its furnaces, skimming stations and/or hot metal transfer stations will comply with the notifications requirements of the rule and conduct a performance test.

^d We have assumed that all five existing respondents and the new respondent will submit semiannual reports with all measurements over any three hour period (e.g., of low pressure) that average more than 10 percent below the averages during the most recent performance test.