

## SUPPORTING STATEMENT

### NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR FERROALLOYS PRODUCTION FACILITIES (40 CFR PART 63, SUBPART YYYYYY) (FINAL RULE)

#### PART A

##### 1.0 Identification of the Information Collection

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

“NESHAP for Ferroalloys Production Facilities (40 CFR part 63, subpart YYYYYY).”

This is a new information collection request (ICR), and the EPA tracking number is 2303.02.

(b) *Short Characterization.*

This ICR covers information collection requirements in the final area source rule for Ferroalloys Production Facilities (40 CFR part 63, subpart YYYYYY). The information collected will be used by EPA and delegated state and local agencies to determine the compliance status of sources subject to the rule.

The potential respondents are owners or operators of any existing or new electrometallurgical operation located at an area source that produces silicon metal, ferrosilicon, ferrotitanium using the aluminum reduction process, ferrovanadium, ferromolybdenum, calcium silicon, silicomanganese zirconium, ferrochrome silicon, silvery iron, high-carbon ferrochrome, charge chrome, standard ferromanganese, silicomanganese, ferromanganese silicon, calcium carbide or other ferroalloy products. We believe there are 10 facilities currently operating that would be subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) for the Ferroalloys Production Area Source Category. The affected source is each new or existing metallurgical operation and covers all charging, smelting, and product tapping operations. Fugitive emissions from the furnace building would also be controlled. Existing area source ferroalloys production facilities are currently well-controlled in terms of metal air toxics emissions as a result of state and national standards, permitting requirements, and/or management practices already taken by the industry to reduce particulate matter. We estimate that the only impact associated with the final rule is the compliance requirements (monitoring,

reporting, recordkeeping, and testing), which are estimated to be approximately \$3,600 per facility.

The final standards establish a limit, as measured by Method 22, on the duration of visible emissions (VE) from the control device(s) on the electrometallurgical operations. The Method 22 test is designed to measure the amount of time that any VE are observed during an observation period. The owner or operator must demonstrate that the control device outlet emissions do not exceed 5 percent of accumulated occurrences in a 60-minute observation period. We refer to this as the 5 percent limit throughout this document. Sources are required to conduct an initial and ongoing semiannual Method 22 test of the control device outlet. Initially, monitoring is based on a daily observation of visible emissions from the control device outlet. If any emissions are observed, the source must conduct a Method 22 test within 24 hours. Upon demonstration of 90 consecutive observations showing no visible emissions, the source may reduce monitoring frequency to a weekly schedule.

The standards also consist of a 20 percent opacity limit on the furnace building, with an upper limit of up to 60 percent opacity for any single six-minute reading. The opacity limit is designed to ensure that the source minimizes fugitive emissions from the EAF operations. The source must conduct a semiannual EPA Method 9 observation to demonstrate compliance with this limit. In order to provide flexibility to sources and reduce the costs of demonstrating compliance, sources may elect to monitor visible emissions using a Method 22 test in place of the semiannual Method 9 test. The Method 22 test is successful if no visible emissions are observed for 90 percent of the readings over the furnace cycle (tap to tap) or 60 minutes, whichever is more. If visible emissions are observed greater than 10 percent of the time over the furnace cycle or 60 minutes, whichever is more, then the facility must conduct a Method 9 test as soon as possible, but no later than 15 calendar days after the Method 22.

The information collection requirements for existing and new sources in the Ferroalloys Production Source Category 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 [tpy] of any single HAP and more than 25 tpy 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 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). We added the source category to the Integrated Urban Air Toxics Strategy area source category list on November 22, 2002 (67 FR 70427). Ferroalloys production was listed for its contributions toward meeting the 90 percent requirement of chromium compounds, manganese compounds, and nickel compounds. Each of these HAP metals is on the list of 30 HAP identified in the 1999 strategy.

Under CAA section 112(d)(5), EPA 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. EPA 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.

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. The recordkeeping and reporting requirements for title V permits are contained in 40 CFR 70.6 and 40 CFR 71.6. Under parts 63 and 70 or 71, 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 standards 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 facilities, records, or processes may need inspection.

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

*(a) Nonduplication.*

A computer search of EPA’s ongoing ICRs revealed no duplication of information-gathering efforts. The information collection requirements in 40 CFR part 63, Subpart XXX apply only to ferroalloy production facilities that are major sources of HAP. The information collection requirements in 40 CFR part 60, subpart Z New Source Performance Standards (NSPS) apply to two of the existing sources and would apply to new sources. These requirements are not inconsistent with the final area source rule and would be reconciled in the Title V permit.

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

The preamble of the associated rulemaking provides the public with notice of this ICR.

*(c) Consultations.*

The final rule was developed in consultation with individual companies and state agencies. The key non-EPA persons consulted on the information collection activities are identified in Table 1.

TABLE 1. PERSONS CONSULTED ON THE INFORMATION COLLECTION ACTIVITIES

<b>Contact</b>	<b>Organization</b>	<b>Email address</b>
Edward Bredniak	CC Metals & Alloys	<a href="mailto:esbredniak@ccmetals.com">esbredniak@ccmetals.com</a>
Don Elverd	Tennessee Alloys Corporation	don.elverd@oxbow.com
Matt Greene	Globe Metallurgical Inc.	mgreene@globemetallurgical.com
Eugene Hogan	Simcala Inc. (Consultant)	genlo25085@hotmail.com
Rick Poynter,	Carbide Industries	rpoynter@carbideinc.com
Dave Renfrew	Elkem Metals	dave.renfrew@elkem.com
Frank Sizemore	Carbide Industries	<a href="mailto:fsizemore@carbideinc.com">fsizemore@carbideinc.com</a>

Contact	Organization	Email address
Joe Smydo	Langeloth Metallurgical	<a href="mailto:jsmydo@langeloth.com">jsmydo@langeloth.com</a>
David White	Metallurg Vanadium	<a href="mailto:dwhite@metvan.com">dwhite@metvan.com</a>

The area source rule was proposed in the *Federal Register* on September 15, 2008 (73 FR 53163). Six public comment letters were received from industry members. While there were no comments on the ICR itself, comments were received on the reporting burden that we did address in the final rule. Specifically, we revised the rule to allow sources that demonstrate a good record of compliance with the furnace visible emissions standard to convert from daily to weekly monitoring after 90 days of no visible emissions observations.

*(d) Effects of Less Frequent Collection.*

If the relevant information were collected less frequently, the delegated permitting authority (State or EPA) will not be reasonably assured that a facility 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 YYYYYYY are owners or operators of any existing or new ferroalloys production facility that is an area source of HAP emissions. The North American Industry Classification System (NAICS) codes for ferroalloys production facilities are 331112, 331419, and 325188. We estimate that 10 area source facilities will be subject to the

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, Information Requirements, summarizes the data items, including recordkeeping and reporting requirements, for the Ferroalloys Production Area Source Category.

New sources would be required to use 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 20 percent of the respondents use electronic reporting.

*(ii) Respondent Activities.* The respondent activities that will be required by the final Ferroalloys Production Area Source NESHAP are identified in Table 2 (located at the end of this supporting statement) and are introduced in section 6(a).

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

*(a) Agency Activities.*

The Agency activities associated with the final Ferroalloys Production Area Source NESHAP are provided in Table 4 (located at the end of this supporting statement) 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 permitting authority. The notifications of compliance status, annual compliance certifications, and reports of startups, shutdowns, and malfunctions required under the final rule are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. EPA is the permitting 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.*

The Small Business Administration defines a small entity as one that meets the Small Business Administration size standards for small businesses found at 13 CFR 121.201 (less than 750 employees for NAICS 331112 and 331419 and less than 1,000 employees for NAICS 325188). We estimate that five facilities are small entities. However, our analysis indicates that the final rule would not impose a significant adverse impact on any facilities, large or small, since these costs are much less than 0.1 percent of revenues.

(d) *Collection Schedule.*

The specific frequency for each information collection activity within this request is shown in Table 4 for the Ferroalloys Production Area Source Category.

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

(a) *Estimating Respondent Burden.*

The annual burden estimates for the final Ferroalloys Production Area Source NESHAP are shown in Table 2. 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 to become affected sources during the 3-year period of this ICR.

(b) *Estimating Respondent Costs.*

The information collection activities for the final Ferroalloys Production Area Source NESHAP are presented in Table 2. Because the data are already collected by respondents as part of normal operations, no respondent development costs are associated with the information collection activities.

(i) *Estimating Labor Costs.* We relied on the 2002 Sixth Edition Control Cost Manual<sup>1</sup>

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<sup>1</sup> United States Environmental Protection Agency, Office of Air Quality Planning and Standards (January 2002) *EPA Air Pollution Control Cost Manual Sixth Edition* EPA/452/B-02-001.

as well as various cost spreadsheets provided by EPA<sup>2</sup> to estimate industry labor rates. Labor rates have been calculated for 2007. We used May 2006 labor rates from the Bureau of Labor Statistics for the Iron and Steel Mills and Ferroalloy Manufacturing (NAICS 331100),<sup>3</sup> and escalated them to 2007 rates using the Employment Cost Index (ECI) provided by the BLS for the manufacturing industry.<sup>4</sup> Loading factors (i.e., fringe benefits and overhead rates) were calculated using methodologies referenced in promulgated regulations and their accompanying Information Collection Requests (ICRs), particularly those used in New Source Review (NSR) regulations. Fringe benefits are calculated as 29% of hourly earnings, and overhead is calculated using a standard 110% above hourly earnings. Table 3 presents the labor rates used in the cost analysis.

**Table 3. 2006 LOADED LABOR RATES**

<b>Labor Category</b>	<b>Hourly earnings [\$2006]</b>	<b>Fringe</b>	<b>Overhead</b>	<b>Loaded</b>	<b>ECI</b>	<b>Loaded 2007 Hourly Earnings (\$)</b>
Professional specialty and technical	31.20	1.29	2.10	84.52	1.020	\$86.18
Installation, maintenance, repair	21.87	1.29	2.10	59.25	1.020	\$60.35
Executive, admin, managerial	47.05	1.29	2.10	127.46	1.020	\$129.96
Admin support	14.07	1.29	2.10	38.12	1.022	\$38.94

To estimate the costs of conducting the initial Method 9 test, we assumed that facilities would hire a contractor to avoid the costs of having to certify plant personnel for Method 9 observations. We show this cost as a one-time expense in the ICR. The estimate is based on information provided by a testing contractor (TRC Solutions.)<sup>5</sup>

(ii) *Estimating Capital and Operations and Maintenance (O&M) Costs.* There are no estimated capital costs or O&M costs associated with the information collection requirements of

<sup>2</sup> Communication with Peter Westlin, EPA, February 2006.

<sup>3</sup> May 2006 National Industry-Specific Occupational Employment and Wage Estimates. Located [http://www.bls.gov/oes/current/naics4\\_331100.htm](http://www.bls.gov/oes/current/naics4_331100.htm)

<sup>4</sup> Bureau of Labor Statistics. Table 5. Compensation (not seasonally adjusted): Employment Cost Index for total compensation, for private industry workers, by occupational group and industry. Available: <http://www.bls.gov/news.release/eci.t05.htm>. Accessed April 25, 2008.

<sup>5</sup> Communication with Jim Serne, TRC Solutions, March 17, 2008.



the final Ferroalloys Production NESHAP for area sources. The rule would not require the purchase or operation of testing or monitoring equipment. Capital and O&M costs were not estimated for new sources because no new sources are expected during the next 3-year period.

(iii) *Annualizing Capital Costs.* Not applicable.

(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 operating permits rules in 40 CFR part 70 or part 71 and the part 63 NESHAP General Provisions, no operational costs will 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 4.

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/07tables/html/gs\\_h.asp](http://www.opm.gov/oca/07tables/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 \$23.36; technical at \$43.17, and management at \$58.18.

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

There are an estimated 10 existing facilities that will be subject to the Ferroalloys Production Area Source NESHAP. No new sources are expected during the next 3 years. Consequently, the average annual number of ferroalloys production facilities during the 3-year period of this ICR is 10.

For the final Ferroalloys Production NESHAP, the components of the total annual responses attributable to this ICR are one-time initial notifications, one-time notifications of compliance status, and annual compliance certifications for the 10 facilities that will be subject to the rule.

The number of total annual responses for subpart YYYYYY is estimated as: 32 (10 annual average respondents × 3 notifications, plus 2 average annual reports of exceedances).

*(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 recordkeeping and reporting requirements in subpart YYYYYY for the 10 existing facilities that subject to the Ferroalloys Production Area Source NESHAP is 387 person-hours, with an annual labor average cost of \$35,662 and annualized capital costs of \$0.

*(ii) The Agency tally.* The average annual Federal Government cost is \$1,646 for 39 hours for subpart YYYYYY. The bottom line Agency burden hours and costs presented in Table 4 (located at the end of this supporting statement) 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.*

EPA is promulgating area source NESHAP for ferroalloy facilities. The burden requested under this ICR is for the monitoring required to ensure the facilities are meeting the promulgated standards.

*(g) Burden Statement*

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 39 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-2008-0154, which is available for online viewing at <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 one of the Docket ID Numbers 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 Docket ID Number EPA-HQ-OAR-2008-0154 and OMB Control Number 2060-NEW in any correspondence.

## **PART B**

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



TABLE 2A. Year 1 ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS OF THE PROPOSED STANDARD								
	(A) Person- hours per occurrence	(B) No. of occurrence respondent per	(C) Person-hours per respondent	(D) Respon- dents per year	(E) Technical person-hour per year	(F) Management person-hour per year	(G) Clerical person- hours per year (Ex0.1)	(H) Cost\$ (a)
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Acquisition, Installation, & Utilization of Tech. & Systems	40.00	10	40.0	0.0	0.0	0.0	0.0	\$ -
4. Reporting Requirements								
A. Read instructions (b)	4.00	10	4.0	10.0	40.0	2.0	4.0	\$ 3,863
B. Required activities								
One-time activity: Initial control device Method 22 Planning	8.00	10	8.0	10.0	80.0	5.0	0.0	\$ 7,544
One-time activity: Initial control device Method 22 Test	2.00	10	2.0	10.0	380	0.0	0.0	\$ 2,293
Periodic control device Method 22	2.00	10	2.0	10.0	380	0.0	0.0	\$ 2,293
Retest control device	2.00	10	2.0	10	2.0	0.0	0.0	\$ 121
Daily VEC check (10 control devices)	0.08	90.0	7.2	10.0	136.8	0.0	0.0	\$ 8,256
Weekly VEC check (10 control devices)	0.08	40.0	3.2	10.0	60.8	0.0	0.0	\$ 3,669
One-time activity: Initial building capacity Method 9 (c)				10.0				\$ 20,000
Periodic (semi-annual) building VE Method 22	2.00	10	2.0	10.0	20.0	0.0	0.0	\$ 1,207
Retest building capacity Method 9				10				\$ 2,000
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Initial Notification	2.00	10	2.0	10.0	20.0	1.0	2.0	\$ 1,931
Notification of Compliance Status	4.00	10	4.0	10.0	40.0	2.0	4.0	\$ 3,863
Annual Compliance Certification (d)	4.00	10	4.0	10.0	40.0	2.0	4.0	\$ 3,863
Report of Exceedences (e)	2.00	10	2.0	2.0	4.0	0.2	0.4	\$ 386
5. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 5E							
C. Implement activities	See 5E							
D. Develop record system	See 5E							
E. Time to enter information								
Records of all info. required by standards (f)	0.25	12.0	3.0	10.0	30.0	1.5	3.0	\$ 2,897
F. Time to train personnel	N/A							
G. Time to adjust existing ways to comply w/ prev. appl. req.	N/A							
H. Time to transmit or disclose information (g)	0.25	10	0.3	10.0	2.5	0.1	0.3	\$ 241
I. Time for audits	N/A							
TOTAL ANNUAL BURDEN AND COST (SALARY)					552.1	13.8	17.7	\$ 64,429
TOTAL ANNUAL NUMBER OF RESPONSES (i)								32
ANNUAL CAPITAL COSTS:								
Total annual capital	0.00							\$ -
ANNUALIZED CAPITAL COSTS:								
Total annualized capital	0.00							\$ -
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								\$ -
(a) Costs are based on the following hourly rates: technical at \$86.18, management at \$129.96, and clerical at \$38.94, except the daily VE and Method 22s are \$60.35.								
(b) One-time activity. There are an estimated 10 existing ferroalloy production facilities and no new facilities are expected.								
(c) One-time activity. Assume the facilities hire a contractor.								
(d) The 10 existing plants would be required to submit an Annual Compliance Certification at the end of Year 1 of the ICR and each year thereafter.								
(e) Assumes that 2 facilities per year would have to submit a Report of Exceedence.								
(f) Recordkeeping requirements begin in Year 1 of ICR clearance period for all existing plants.								
(g) Transmittals would include Initial Notifications for 10 plants, Notifications of Compliance Status for 10 plants, Annual Compliance Certifications for 10 plants (combined with exceedence Reports), for an average of (10+10+10)/3=10 for each year of the 3-yr ICR clearance period.								
(i) The total annual number of responses is calculated by summing the production columns B and D for each of the reports listed in 4B.								

TABLE 2B. Year 2/3 ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS OF THE PROPOSED STANDARD								
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person-hours per occurrence	No. of occurrences per respondent per	Person-hours per respondent	Respondents per year	Technical person-hours per year (E=CxD)	Management person-hours per year (E x 0.05)	Clerical person-hours per	Cost\$ (a)
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, & Utilization of Tech. & Systems	40.00	10	400	0.0	0.0	0.0	0.0	
4. Reporting Requirements								
A. Read instructions (b)	4.00	10	4.0	0.0	0.0	0.0	0.0	
B. Required activities								
One-time activity: Initial control device Method 22 Planning	8.00	10	8.0	0.0	0.0	0.0	0.0	\$ -
One-time activity: Initial control device Method 22 Test	2.00	10	2.0	0.0	0.0	0.0	0.0	
Periodic control device Method 22	2.00	2.0	4.0	10	76.0	0.0	0.0	\$ 4,587
Retest control device	2.00	10	2.0	10	2.0	0.0	0.0	\$ 121
Weekly VE check (19 control devices)	0.08	52.0	4.2	19.0	79.0	0.0	0.0	\$ 4,770
One-time activity: Initial building capacity Method 9 (c)				0.0				\$0
Periodic (semi-annual) building VE Method 22	2.00	2.0	4.0	10	40.0	0.0	0.0	\$ 2,414
Retest building capacity Method 9				10	0.0	0.0	0.0	\$2,000
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Initial Notification	2.00	10	2.0	0.0	0.0	10	10	\$ -
Notification of Compliance Status	4.00	10	4.0	0.0	0.0	10	0.0	\$ -
Annual Compliance Certification (d)	4.00	10	4.0	10	40.0	2.0	4.0	\$ 3,863
Report of Exceedences (e)	2.00	10	2.0	2.0	4.0	0.2	0.4	\$ 386
5. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 5E							
C. Implement activities	See 5E							
D. Develop record system	See 5E							
E. Time to enter information								
Records of all info. required by standards (f)	0.25	12.0	3.0	10.0	30.0	1.5	3.0	\$ 2,897
F. Time to train personnel	N/A							
G. Time to adjust existing ways to comply w/ prev. appl. req.	N/A							
H. Time to transmit or disclose information (g)	0.25	10	0.3	10.0	2.5	0.1	0.3	\$ 241
I. Time for audits	N/A							
TOTAL ANNUAL BURDEN AND COST (SALARY)					273.5	5.8	8.7	\$ 21279
TOTAL ANNUAL NUMBER OF RESPONSES (h)								12
ANNUAL CAPITAL COSTS:								
To total annual capital	0.00							\$ -
ANNUALIZED CAPITAL COSTS:								
To total annualized capital	0.00							\$ -
TOTAL ANNUALIZED COSTS (Annualized capital + O&M costs)								\$ -
(a) Costs are based on the following hourly rates: technical at \$86.18, management at \$129.96, and clerical at \$389.4, except that daily VE and Method 22s are \$60.35.								
(b) One-time activity. There are an estimated 10 existing ferroalbyls production facilities and no new facilities are expected.								
(c) One-time activity. Assume the facilities hire a contractor.								
(d) The 10 existing plants would be required to submit an Annual Compliance Certification at the end of Year 1 of the IC R, and each year thereafter.								
(e) Assumes that 2 facilities per year would have to submit a Report of Exceedence.								
(f) Recordkeeping requirements begin in Year 1 of IC R clearance period for all existing plants.								
(g) Transmittals would include Annual Compliance Certifications for 10 plants.								
(h) The total annual number of responses is calculated by summing the product of columns B and D for each of the reports listed in 4B.								

TABLE 4. ANNUAL BURDEN AND COST TO THE FEDERAL GOVERNMENT OF THE PROPOSED STANDARDS

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 (E x 0.05)	(G) Clerical person- hours per year (E x 0.1)	(H) Cost, \$ (a)
Report Review								
Initial Notification (b)	1.0	1.0	1.0	3.3	3.3	0.2	0.3	\$161
Notification of Compliance Status (c)	2.0	1.0	2.0	3.3	6.7	0.3	0.7	\$323
Annual Compliance Certification (d)	2.0	1.0	2.0	10.0	20.0	1.0	2.0	\$968
Report of Exceedence (e)	2.0	1.0	2.0	2.0	4.0	0.2	0.4	\$194
<b>TOTAL BURDEN AND COST (SALARY)</b>					<b>34.0</b>	<b>1.7</b>	<b>3.4</b>	<b>\$1,646</b>

- (a) Costs are based on the following hourly rates: technical at \$43.17, management at \$58.18, and clerical at \$23.36. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.
- (b) All 10 plants will submit the initial notification, leading to an average annual burden of 3 plants/yr.
- (c) All 10 plants will submit the notification of compliance status, leading to an average annual burden of 3 plants/yr.
- (d) All 10 plants will submit an annual compliance certification each year.
- (e) Assumes that 2 facilities per year would have to submit an exceedance report per year.
- N/A = Not applicable.

**ATTACHMENT 1. INFORMATION REQUIREMENTS--NESHAP FOR FERROALLOYS PRODUCTION AREA SOURCES**

<b>Requirement</b>	<b>Citation for existing sources</b>	<b>Citation for new sources</b>	<b>General Provisions citation</b>
<b>Monitoring</b>	N/A	N/A	N/A
<b>Notifications</b>			
Notification of applicability	§63.11529(a)	§63.11529(a)	40 CFR 63.9(b)(2)
Notification of construction/reconstruction	N/A	N/A	40 CFR 63.9(b)(5)
Notification of special compliance requirements	N/A	N/A	40 CFR 63.9(d)
Notification of performance test	N/A	N/A	40 CFR 63.9(e)
Notification of opacity/VE observations	N/A	N/A	40 CFR 63.9(f)
Additional CMS notifications	N/A	N/A	40 CFR 63.9(g)
Notification of compliance status	§63. 11529(b)	§63. 11529(b)	40 CFR 63.9(h)
Notification of changes in information	N/A	N/A	40 CFR 63.9(j)
<b>Plans</b>			
SSM plan	N/A	N/A	40 CFR 63.6(e)(3)
Performance test plan	N/A	N/A	N/A
Bag leak detection system monitoring plan	§63. 11527(a)(5)	§63. 11527(a)(5)	N/A
CMS quality control plan	N/A	N/A	40 CFR 63.8(d)
CMS performance evaluation test plan	N/A	N/A	40 CFR 63.8(e)(3)
<b>Records</b>			
Records of notifications	§63. 11529 (d)(1)	§63. 11529 (d)(1)	40 CFR 63.10
Records that demonstrate continuous compliance	§63. 11529 (d)(2)	§63. 11529 (d)(2)	40 CFR 63.10
Monitoring information	§63. 11529 (d)(2)	§63. 11529 (d)(2)	40 CFR 63.10
<b>Reports</b>			
Reports of exceedences	N/A	N/A	N/A
Semiannual monitoring reports	N/A	N/A	N/A
Initial/repeat performance tests	N/A	N/A	N/A
Quality assurance test plan	N/A	N/A	N/A
CMS performance evaluation/report	N/A	N/A	40 CFR 63.8(e)(5)
SSM reports	N/A	N/A	40 CFR 63.6(e)(3)
Excess emissions reports	N/A	N/A	40 CFR 63.10(e)(3)
Annual compliance certifications	§63. 11529 (c)	§63. 11529 (c)	N/A