Table 1: Annual Respondent Burden and Cost – NESHAP for Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR) (Renewal)

REPORTING/ RECORDKEEPING REQUIREMENT	(A) Respondent Hours per Occurence (Technical hours)	(B) Number of Occurences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year[a]	(E) Technical Hours per Year @ $97.59 (E=C x D)	(F) Management Hours per Year @ $114.77 (F= E x 0.05)	(G) Clerical Hours per Year @ $48.26 (G= E x	(H) Total Labor Costs per Year
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read instructions [b]	2	1	2	0	0	0	0	$0.00
B. Required activities								
Performance test – facility labor [c]	40	1	40	3.2	128	6.4	12.8	$13,843.78
Performance test – contractor costs [d]	-	-	-	-	-	-	-	$333,000
Startup , shutdown, and malfunction plan	40	1	40	3.2	128	6.4	12.8	$13,843.78
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write reports								
Initial notification [b]	2	1	2	0	0	0	0	$0.00
Compliance extension request [b]	2	1	2	0	0	0	0	$0.00
Site-specific test plan [e]	40	1	40	3.2	128	6.4	12.8	$13,843.78
Operation and maintenance plan [f]	40	1	40	0	0	0	0	$0.00
Fugitive dust emission control plan [g]	20	1	20	0	0	0	0	$0.00
Site-specific monitoring plan [h]	80	1	80	0	0	0	0	$0.00
Semiannual compliance reports	8	2	16	8	128	6.4	12.8	$13,843.78
Petition for alternative monitoring requirements	40	1	40	0	0	0	0	$0.00
Notification of performance test [i]	4	3	12	3.2	38.4	1.92	3.84	$4,153.13
	Total Reporting Hours by Labor Category				294	15	29	
TOTAL REPORTING BURDEN						**338.6**	**Hours**	**$392,528**
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	3	1	3	0	0	0	0	$0.00
C. Develop record system	16	1	16	0	0	0	0	$0.00
D. Time to train personnel	3	1	3	0	0	0	0	$0.00
E. Time to transmit or disclose information	1	2	2	8	16	0.8	1.6	$1,730.47
F. Time for audits	N/A							
	Total Recordkeeping Hours by Labor Category				272	14	27	
TOTAL RECORDKEEPING BURDEN						**312.8**	**Hours**	**$362,418**
Subtotals Labor Burden and cost					566	28	57	$754,946

TOTAL LABOR BURDEN AND COST (rounded)					651.4	$754,946

Assumptions:

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

[b] This is a one-time only activity.

[c] We have assumed that it will take 40 hours for each facility to complete performance test, and that performance tests are repeated every two of five years. Therefore, an average of 3.2 facilities per year will complete performance tests (2 performance test/5 years*8 facilities)

[d] We have assumed that contractors costs to complete performance testing are based on the following: (53 indurating furnaces and ore dryer Method 5 PM tests @$8,000/test)+(115 OCH and PH Method 5 PM tests @ $5,000/test) for a total of $999,000 for three years. Therefore, contractor costs will be $333,000 per year ($999,000/3 years)

[e] We have assumed that 20 percent of all sources will send in a site-specific test plan.

[f] We have assumed that each respondent will take 40 hours to write the operation and maintenance plan.

[g] We have assumed that each respondent will take 20 hours to write the fugitive dust emission control plan.

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

[i] We have assumed that each respondent will take 4 hours to complete the notification of performance test report.

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

REPORTING/ RECORDKEEPING REQUIREMENT	(A) EPA Hours per Occurence (Technical hours)	(B) Number of Occurences per Plant per Year	(C) EPA Hours per Plant per Year (C=A x B)	(D) Plants per Year [a]	(E) Technical Hours per Year @ $45.52 (E=C x D)	(F) Management Hours per Year @ $61.36 (F= E x 0.05)	(G) Clerical Hours per Year @ $24.64 (G= E x 0.1)	(H) Costs per Year
Initial performance tests [b,c]	8	7	56	0	0	0	0	$0
Report Review								
Initial notification [b]	2	1	2	0	0	0	0	$0
Notification of initial performance test [b]	2	3	6	0	0	0	0	$0
Fugitive dust emissions control plan [d]	10	1	10	0	0	0	0	$0
Compliance extension request	2	1	2	0	0	0	0	$0
Site-specific test plan [e]	10	1	10	3.2	32	1.6	3.2	$1,634
Operation and maintenance plan [e]	10	1	10	0	0	0	0	$0
Site-specific monitoring plan [e]	10	1	10	0	0	0	0	$0
Petition for alternative monitoring requirements	5	1	5	0	0	0	0	$0
Review of semiannual compliance report	4	2	8	8	64	3.2	6.4	$3,267
Review of startup, shutdown, and malfunction plan	10	1	10	8	80	4	8	$4,084
Subtotals Labor Burden and cost					176	8.8	17.6	$8,985.15
TOTAL ANNUAL BURDEN AND COST (rounded)					202			$8,985

Assumptions:

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

[b] This is a one-time only activity.

[c] We have assumed that the initial performance test/occurrences per respondent are based on the following: (53 indurating furnaces and ore dryer Method 5 PM tests +115 OCH and PH Method 5 PM tests) for a total of 168 Method 5 PM tests for three years. 168 tests/3 years = 56 Method 5 PM tests/year. (56 Method 5 PM tests/year)/(8 plants) = 7 Method 5 PM tests per year per plant.

[d] We have assumed that each of the fugitive dust emissions control plan will be unchanged.

[e] We have assumed that it will take each respondent 10 hours to review the plan.