

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal), EPA ICR Number 2277.03, OMB Control Number 2060-0608

**1(b) Short Characterization/Abstract**

Potential respondents are owners or operators of Electric Arc Furnace (EAF) steelmaking facilities that are area sources of hazardous air pollutants (HAP) emissions. The final standards, promulgated in 2007, establish particulate matter (PM) emission limits for control devices and opacity limits for melt shops; pollution prevention requirements for ferrous scrap that is melted in EAFs; and monitoring, reporting, and recordkeeping requirements.

All respondents are required to comply with the compliance assurance monitoring requirements in 40 CFR part 64. Respondents must conduct initial performance tests (if a performance test has not been conducted in the previous 5 years) and operate according to a startup, shutdown, and malfunction plan. Options are provided for the pollution prevention requirements for scrap: (1) restrict the use of certain scrap that contains contaminants such as mercury, organic liquids, or lead; or (2) implement a pollution prevention plan for scrap inspection and selection to limit the amount of organics, mercury, and lead in the scrap. The plans must include provisions to demonstrate compliance such as periodic inspections of incoming scrap and recordkeeping. All respondents are required to submit one-time notifications, make semiannual compliance reports, and maintain records of specific information to ensure that the rule requirements are being achieved. These requirements are listed in Section 4(b)(i).

Based on our consultations with industry representatives, each plant site has only one respondent (i.e., the owner/operator of the plant site).

There are approximately 91 electric arc furnace steelmaking facilities in the United States, which are all owned and operated by the iron and steel mill industry. None of the 91 facilities are owned by state, local, tribal or the Federal government. They are all owned and operated by privately owned, for-profit businesses. The burden to the "Affected Public" is listed below in Table 1: Annual Respondent Burden and Cost, NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal). The burden to the Federal government is attributed entirely to work performed by Federal employees or government contractors; this burden may be found below in Table 2: Average Annual EPA Burden, NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal).

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (ICR) without any “Terms of Clearance.”

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

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

The EPA is charged under section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. 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, emissions from electric arc furnace steelmaking facilities, cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 63, subpart YYYYYY.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in the standard 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 standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance tests, 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 standard 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, that leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

### **3. Non-duplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart YYYYYY.

#### **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 (75 FR 30812) on June 2, 2010. No comments were received on the burden published in the Federal Register.

#### **3(c) Consultations**

The final standards were developed in consultation with state and local agencies, EPA regional office experts, individual plants, and their trade associations. For example, several meetings and telephone consultations were held with representatives from the affected plants, and their trade associations. The non-EPA persons consulted on the information collection activities were:

<b>Contact</b>	<b>Organization</b>	<b>Telephone Number</b>
Eric Stuart	Steel Manufacturers' Association	202-296-1515
Jim Schultz	American Iron and Steel Institute	202-452-7180
John Wittenborn	Counsel for the Specialty Steel Industry of North America	202-342-8514

#### **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 proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

### **3(e) General Guidelines**

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

### **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**

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

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

### **4(a) Respondents/SIC Codes**

The respondents to the recordkeeping and reporting requirements are iron and steel mills. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standard is 3312, which corresponds to the North American Industry Classification System (NAICS) 331111.

<b>40 CFR Part 63, Subpart YYYYY</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Iron and Steel Mills	3312	331111

### **4(b) Information Requested**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

#### **(i) Data Items**

In this ICR, all the data recorded or reported is required by National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY).

A source must prepare the following studies and plans:

<b>Studies and Plans</b>	
Scrap management plan	63.10685(a)(1) and (b)(1)
Startup, shutdown, and malfunction plan	63.6(e)(3)

A source must make the following reports:

<b>Notifications</b>	
Notification of applicability	63.9(b)(1)
Notification and application of construction, reconstruction	63.9(b)(4)
Compliance extension	63.9(c)
Notification of special requirements	63.9(d)
Notification of performance test	63.9(e)
Notification of opacity observations	63.9(f)
Additional COMS notifications	63.9(g)
Notification of compliance status	63.10690(b) and 63.9(h)
Semiannual compliance report	63.10685(c)
Startup, shutdown, malfunction report	63.10(d)(5)(ii)

A source must keep the following records:

<b>Recordkeeping</b>	
Notifications and reports	63.10(b)(2)(xiv)
Startups, shutdowns, malfunctions	63.6(e)(1)(iii)-(v)
Performance tests, performance evaluations, and opacity observations	63.10(b)(2)(viii)-(ix)
Emission/operating limits	63.10(b)(2)(vii)
Scrap management requirements	63.10685(c) and 63.10(b)(2)(iii)
Continuous monitoring systems	63.10(b)(2)(vi)- (vii), (x)-(xi) 63.10(c); 63.6(h)(7); 63.8(d)(3)

### Electronic Reporting

Some of the respondents are using 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 10 percent of the respondents use electronic reporting.

**(ii) Respondent Activities**

<b>Respondent Activities</b>
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure.
Perform initial performance test and repeat performance tests if necessary.
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.
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.
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.

<b>Agency Activities</b>
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 operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs.

Information contained in the reports is entered into OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters.

EPA delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner or operator for two years.

### **5(c) Small Entity Flexibility**

A small entity for this industry is defined by the Small Business Administration as a firm having no more than 1,000 employees. Of the 91 facilities that will be subject to the rule, two facilities are considered to be small entities.

Although the final rule would not have a significant economic impact on the small entities, we tried to reduce the impact of the rule on small facilities. We held several meetings with industry trade associations and company representatives to discuss the rule and have included provisions to address their concerns.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost, NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR part 63, subpart YYYYYY) (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 the industry for the subpart 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 1,481 hours. The recordkeeping hours shown below in Table 1 are 923. The reporting requirement hours shown below in Table 1 are 558. These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP 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	\$116.05 (\$55.26 + 110%)
Technical	\$97.21 (\$46.29 + 110%)
Clerical	\$48.87 (\$23.27 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2010, "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 only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are no capital/startup or operation and maintenance costs.

### **(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs**

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance costs.

### **6(c) Estimating Agency Burden and Cost**

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA 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 \$5,499.

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

Managerial	\$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2010 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Annual Agency Burden and Cost, NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal).

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

The EPA estimates that 91 area source plants with EAF steelmaking facilities will be subject to the rule requirements. No new respondents are anticipated during the next 3 years. The overall average number of respondents, as shown in the table below, is 91 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR.

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>a</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	91	0	0	91
2	0	91	0	0	91
3	0	91	0	0	91
Average (Rounded)	0	91	0	0	91

<sup>a</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 91.

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
(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=(B×C)+D
Prepare scrap plan and scrap specifications	0	0	N/A	0
Initial performance tests <sup>a</sup>	0	0	N/A	0
Notification of compliance status	0	0	N/A	0
Request for compliance extension	0	0	N/A	0
Notification of performance test	0	0	N/A	0
Notification of startup, shutdown, and malfunction plan/reports	0	0	N/A	0
Semiannual excess emissions reports	91	2	N/A	182
TOTAL (rounded)				182

N/A – Not Available.

<sup>a</sup> After full implementation, existing facilities are not expected to perform initial performance tests.

The number of Total Annual Responses is 182. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost, NESHAP for Area Sources:

Electric Furnace Arc Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal).

### **6(e) Bottom Line Burden Hours and Cost Tables**

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown below in Tables 1 and 2, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 1,481. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost, NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 8 hours per response.

There are no annual capital/startup and O&M costs to the regulated entity. 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 122 labor hours at a cost of \$5,499. See below Table 2: Annual Agency Burden and Cost, NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal).

### **6(f) Reasons for Change in Burden**

There is a decrease in Respondent labor hours and an increase in labor cost. This is due to the fact that the rule for this subpart is now fully implemented. The previous ICR covered the initial phase of standard implementation which occurred over a three-year period. This ICR shows the labor hour and cost burden after full implementation. The changes are due to adjustments rather than program changes.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 8 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 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-2010-0353. 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) 566-1752. 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-2010-0353 and OMB Control Number 2060-0608 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, NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal)**

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
Reporting/Recordkeeping Requirements	Person-hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C = A×B)	Respondents per year <sup>a</sup>	Technical person-hours per year (E = C×D)	Management person-hours per year (E×0.05)	Clerical person-hours per year (E×0.1)	Total hours per year (H = E + F + G)	Cost (\$) <sup>b</sup>
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 <sup>d</sup>	8	1	8.00	0	0	0	0	0	\$0
B. Required activities									
Prepare scrap plan and scrap specifications <sup>d</sup>	4	1	4.00	0	0	0	0	0	\$0
Initial performance tests <sup>c</sup>									
C. Create information	See 4B								
D. Gather existing information	See 4B								
E. Write report	See 4B								
Initial notification of applicability <sup>d</sup>	2	1	2.00	0	0	0	0	0	\$0
Notification of compliance status <sup>d</sup>	2	1	2.00	0	0	0	0	0	\$0
Request for compliance extension	N/A								
Notification of performance test <sup>c</sup>									
Startup, shutdown, and malfunction plan/reports	4	1	4.00	30.3	121.20	6.06	12.12	139.38	\$13,077.42
Semiannual excess emissions reports	2	2	4.00	91	364.00	18.20	36.40	418.60	\$39,275.42
<i>Reporting Subtotal</i>								558	\$52,353
5. Recordkeeping Requirements									
A. Read instructions	See 4A								
B. Plan activities	See 4A								
C. Implement activities	See 4A								
D. Develop record system <sup>d</sup>	4	1	4.00	0	0	0	0	0	\$0
E. Time to enter information	0.5	52	26.00	30.3	787.80	39.39	78.78	905.97	\$85,003.23
F. Time to transmit or disclose information	0.25	2	0.50	30.3	15.15	0.76	1.52	17.42	\$1,634.68
G. Time to adjust existing ways <sup>d</sup>	2	1	2.00	0	0	0	0	0	\$0

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
Reporting/Recordkeeping Requirements	Person-hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (C = A×B)	Respondents per year <sup>a</sup>	Technical person-hours per year (E = C×D)	Management person-hours per year (E×0.05)	Clerical person-hours per year (E×0.1)	Total hours per year (H = E + F + G)	Cost (\$) <sup>b</sup>
F. Time to train personnel <sup>d</sup>	4	1	4.00	0	0	0	0	0	\$0
G. Time for audits	N/A								
<i>Recordkeeping Subtotal</i>								923	\$86,638
<b>TOTAL ANNUAL BURDEN AND COST</b>								1,481	\$138,991

N/A = Not Applicable.

<sup>a</sup> There are 91 EAF steelmaking facilities. The average number of respondents per year for one-time events over the 3-year period of the ICR is 30.

<sup>b</sup> This ICR uses the following labor rates: \$116.05 for managerial labor, \$97.21 for technical labor, and \$48.87 for clerical labor. These rates are from the U.S. Department of Labor, Bureau of Labor Statistics, March 2010. The rates have been increased by 60 percent to account for overhead.

<sup>c</sup> All plants have conducted performance tests within the previous 5 years. No additional performance tests are attributed to the proposed rule.

<sup>d</sup> After full implementation, existing facilities are not expected to experience any burden from these activities and no new facilities are expected to become subject to the rule over the 3-year period.

**Table 2. Annual Agency Burden and Cost, NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal)**

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	Plants per year <sup>a</sup>	Technical person- hours per year (D = A×B×C)	Management person-hours per year (D×0.05)	Clerical person-hours per year (D×0.1)	Total Hours/Year (G = D + E + F)	Cost <sup>b</sup> (\$)
<b>Report Review</b>								
Initial notification of applicability <sup>c</sup>	1	1	0	0	0	0	0	\$0
Startup, shutdown, malfunction plan/report	2	1	30.3	60.60	3.03	6.06	69.69	\$3,140.56
Notification of compliance status <sup>c</sup>	1	1	0	0	0	0	0	\$0
Semiannual excess emissions report	0.5	1	91	45.50	2.28	4.55	52.33	\$2,358.01
<i>Report Review Subtotal</i>							122	\$5,499
<b>TOTAL ANNUAL BURDEN</b>							122	\$5,499

**Assumptions:**

<sup>a</sup> There are 91 EAF steelmaking facilities. The average number of respondents per year for one-time events over the 3-year period of the ICR is 30.

<sup>b</sup> This ICR uses the following average hourly labor rates: \$62.27 for managerial (GS-13, Step 5, \$38.92 × 1.6), \$46.21 (GS-12, Step 1, \$28.88 × 1.6) for technical and \$25.01 (GS-6, Step 3, \$15.63 × 1.6) for clerical. These rates are from the Office of Personnel Management (OPM) “2010 General Schedule” which excludes locality rates of pay.

<sup>c</sup> After full implementation, the agency is not expected to experience any burden from these activities because existing facilities are not longer expected to submit Initial notifications of applicability or Notifications of compliance status. No new facilities are expected to become subject to the rule over the 3-year period.