

Inputs for Respondent Burden Table

	No. of respondents		Applies to:
	Total	3-yr Ave.	
Total number of existing affected plants	2		2
No. of new affected plants per year	0		0
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Total number of affected plants	2		Read rule; submit Initial Notification; Notification of Compliance Status; train 2 staff; keep records, annual compliance certification
No. of small businesses	0		0
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Reporting			
Initial Notification	2		1
Notification of Compliance Status	2		1
Annual Compliance Certification	2		1
Annual Report of Exceedences	1		0 Assumes 1 facility per year reports an exceedance
TOTAL			2
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Recordkeeping			
Records of operations	2		2
No. of plant transmittals			
Initial Notification	2		1
Notification of Compliance Status	2		1
Annual Compliance Certification	2		2
Annual Report of Deviations	0		0
TOTAL			3
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Cost of file cabinet		\$0	
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Labor category -- Respondents	\$/hr	\$/hr (+ Ovhd)	Description from Reference 1.
Technical		\$111.48	Architecture and Engineering Occupations: 17-0000
Management		\$132.04	Management Occupations: 11-0000
Clerical		\$41.75	Office and Administrative Support Occupations: 43-9061
Maintenance		\$63.80	Installation, Maintenance, Repair
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Labor category -- Agency	\$/hr		Description from Reference 2.
Technical	\$46.21		GS-12, Step 1, \$28.88 + 60%
Management	\$62.27		GS-13, Step 5, \$38.92 + 60%
Clerical	\$25.01		GS-6, Step 3, \$15.63 + 60%

Ref. 1: May 2010 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 331100-Iron and Steel Mills and Ferroalloy Manufacturing

Ref. 2: Office of Personnel Management (OPM) 2010 General Schedule, Salary Table 2010-GS

TABLE 1. YEAR 1 ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR FERROALLOYS PRODUCTION: FERROMANGANESE AND SILICOMANGANESE

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
	Person-hours per occurrence	Stack testing cost per occurrence	Other non-labor costs per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (AxD)	Respondents per year	Technical person-hours per year (ExF)	Management person-hours per year (Gx0.05)	Clerical person-hours per year (Gx0.1)	Total labor costs per year	Total non-labor costs per year ((B+C)xDxF)	Total number of responses per year (DxF)
1. Applications	N/A											
2. Survey and Studies	N/A											
3. Reporting Requirements												
A. Read instructions (b)	20.00			1.0	20.0	2.0	40.0	0.4	4.0	\$4,679	\$0	2
B. Required activities												
a. Initial Compliance test (PM, HCl, Hg, PAH, formaldehyde) - PP FF (c)	15.00	\$200,000		3.0	45.0	0.0	0.0	0.0	0.0	\$0	\$0	0
b. Initial Compliance test (PM, HCl, Hg, PAH, formaldehyde) - NP FF/Scrb (c)	15.00	\$52,000		2.0	30.0	0.0	0.0	0.0	0.0	\$0	\$0	0
c. Initial Compliance test (PM) -- NP FF(c)	20.00	\$10,000		4.5	90.0	0.0	0.0	0.0	0.0	\$0	\$0	0
d. Initial Method 9 (c)	4.00	\$2,000		1.5	6.0	0.0	0.0	0.0	0.0	\$0	\$0	0
e. Manganese ore sampling	2.00		\$200	3.0	6.0	0.0	0.0	0.0	0.0	\$0	\$0	0
f. Daily VE check (5 control devices)	0.25			365.0	91.3	0.0	0.0	0.0	0.0	\$0	\$0	0
g. Daily VE check (8 control devices)	0.40			365.0	146.0	0.0	0.0	0.0	0.0	\$0	\$0	0
h. Pressure drop/liquid flow rate CPMS-scrubber												
Initial Capital	2.00		\$50,000	1.0	2.0	0.0	0.0	0.0	0.0	\$0	\$0	0
Annual (O&M)	2.00		\$18,000	1.0	2.0	0.0	0.0	0.0	0.0	\$0	\$0	0
i. Carbon injection rate CPMS												
Initial Capital	2.00		\$20,000	1.0	2.0	0.0	0.0	0.0	0.0	\$0	\$0	0
Annual (O&M)	2.00		\$6,200	1.0	2.0	0.0	0.0	0.0	0.0	\$0	\$0	0
j. Bag Leak Detection System												
Initial Capital	4.00		\$265,000	0.5	2.0	0.0	0.0	0.0	0.0	\$0	\$0	0
Annual (O&M)	4.00		\$94,000	0.5	2.0	0.0	0.0	0.0	0.0	\$0	\$0	0
k. Differential pressure monitor												
Initial Capital	2.00		\$2,300	2.0	4.0	0.0	0.0	0.0	0.0	\$0	\$0	0
Annual (O&M)	2.00		\$230	2.0	4.0	0.0	0.0	0.0	0.0	\$0	\$0	0
C. Create information	See 3B										\$0	
D. Gather existing information	See 3B										\$0	
E. Write report											\$0	
a. Initial Notification	N/A											
b. Notification of Compliance Status	4.00			1.0	4.0	0.0	0.0	0.0	0.0	\$0	\$0	0
c. Annual Compliance Certification (d)	10.00			1.0	10.0	0.0	0.0	0.0	0.0	\$0	\$0	0
d. Report of Exceedences (e)	10.00			1.0	10.0	0.0	0.0	0.0	0.0	\$0	\$0	0
e. Develop process fugives ventilation plan	80.00			1.0	80.0	2.0	160.0	1.0	16.0	\$18,637	\$0	2
f. Update fugitive dust control plan	10.00			1.0	10.0	2.0	20.0	1.0	2.0	\$2,445	\$0	2
g. Update baghouse monitoring plan	10.00			1.0	10.0	2.0	20.0	1.0	2.0	\$2,445	\$0	2
h. Develop bagleak detection system SOP	20.00			1.0	20.0	2.0	40.0	1.0	4.0	\$4,758	\$0	2
i. Affirmative Defense	30.00			1.0	30.0	0.0	0.0	0.0	0.0	\$0	\$0	0
Reporting Subtotal				762.0	628.3	10.0	280.0	4.4	28.0	\$32,964	\$0	10
4. Recordkeeping Requirements												
A. Read instructions	See 3A										\$0	0
B. Implement activities	N/A										\$0	0
C. Develop record system	N/A										\$0	0
D. Time to enter information												
E. Records of all info. required by standards (f)	1.00			60.0	60.0	0.0	0.0	0.0	0.0	\$0	\$0	0
F. Time to train personnel	20.00			1.0	20.0	2.0	40.0	1.0	4.0	\$4,758	\$0	0
G. Time for audits	N/A									\$0	\$0	0
Recordkeeping Subtotal				61.0	80.0	2.0	40.0	1.0	4.0	\$4,758	\$0	0
TOTAL				823.0	708.3	12.0	320.0	5.4	32.0	\$37,723	\$0	10.0
							Total Hours	Labor Cost	Non-Labor	Total		
							357	\$37,723	\$0	\$ 37,723		
										\$0		
										\$0		
										\$0		

N/A = Not Applicable.

- (a) Costs are based on the following hourly rates: technical at \$111.48, management at \$132.04, and clerical at \$41.75, except the daily VE and Method 22s are \$63.80.
- (b) One-time activity. There are an estimated 2 existing ferroalloys production facilities and no new facilities are expected.
- (c) Occurs every 5 years, initial tests estimated to occur in Year 2 of ICR. Assume the facilities hire a contractor. Costs based on estimates provided by EPA Emissions Measurement Group.
- (d) The 2 existing plants would be required to submit an Annual Compliance Certification at the end of Year 2 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 2 of ICR clearance period for all existing plants.
- (g) Transmittals would include Initial Notifications for 2 plants, Notifications of Compliance Status for 2 plants, Annual Compliance Certifications for 10 plants (combined with exceedence Reports), for an average of $(2+2+2)/3 = 2$ for each year of the 3-yr ICR clearance period.
- (i) 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 2. YEAR 2 ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR FERROALLOYS PRODUCTION: FERROMANGANESE AND SILICOMANGANESE

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
	Person-hours per occurrence	Stack testing cost per occurrence	Other non-labor costs per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (AxD)	Respondents per year	Technical person-hours per year (ExF)	Management person-hours per year (Gx0.05)	Clerical person-hours per year (Gx0.1)	Total labor costs per year	Total non-labor costs per year ((B+C)xDxF)	Total number of responses per year (DxF)
1. Applications	N/A											
2. Survey and Studies	N/A											
3. Reporting Requirements												
A. Read instructions (b)	20.00			1.0	20.0	0.0	0.0	0.0	0.0	\$0	\$0	0
B. Required activities												
a. Initial Compliance test (PM, HCl, Hg, PAH, formaldehyde) - PP FF (c)	15.00	\$200,000		3.0	45.0	1.0	45.0	0.5	4.5	\$5,270	\$600,000	3
b. Initial Compliance test (PM, HCl, Hg, PAH, formaldehyde) - NP FF/Scrb (c)	15.00	\$52,000		2.0	30.0	1.0	30.0	0.5	3.0	\$3,536	\$104,000	2
c. Initial Compliance test (PM) -- NP FF(c)	20.00	\$10,000		4.5	90.0	2.0	180.0	1.0	18.0	\$20,950	\$90,000	9
d. Initial Method 9 (c)	4.00	\$2,000		1.5	6.0	2.0	12.0	1.0	1.2	\$1,520	\$6,000	3
e. Manganese ore sampling	2.00		\$200	3.0	6.0	2.0	12.0	1.0	1.2	\$1,520	\$1,200	0
f. Daily VE check (5 control devices)	0.25			365.0	91.3	1.0	91.3	0.5	9.1	\$6,269	\$0	0
g. Daily VE check (8 control devices)	0.40			365.0	146.0	1.0	146.0	0.5	14.6	\$676	\$0	0
h. Pressure drop/liquid flow rate CPMS-scrubber												
Initial Capital	2.00		\$50,000	1.0	2.0	1.0	2.0	0.5	0.2	\$297	\$50,000	0
Annual (O&M)	2.0		\$18,000	1.0	2.0	1.0	2.0	0.5	0.2	\$297	\$18,000	0
i. Carbon injection rate CPMS												
Initial Capital	2.0		\$20,000	1.0	2.0	1.0	2.0	0.5	0.2	\$297	\$20,000	0
Annual (O&M)	2.0		\$6,200	1.0	2.0	1.0	2.0	0.5	0.2	\$297	\$6,200	0
j. Bag Leak Detection System												
Initial Capital	4.0		\$265,000	0.5	2.0	2.0	4.0	1.0	0.4	\$595	\$265,000	0
Annual (O&M)	4.0		\$94,000	0.5	2.0	2.0	4.0	1.0	0.4	\$595	\$94,000	0
k. Differential pressure monitor												
Initial Capital	2.0		\$2,300	2.0	4.0	2.0	8.0	1.0	0.8	\$1,057	\$9,200	0
Annual (O&M)	2.0		\$230	2.0	4.0	2.0	8.0	1.0	0.8	\$1,057	\$920	0
C. Create information	See 3B										\$0	
D. Gather existing information	See 3B										\$0	
E. Write report											\$0	
a. Initial Notification	N/A											
b. Notification of Compliance Status	4.0			1.0	4.0	0.0	0.0	0.0	0.0	\$0	\$0	0
c. Annual Compliance Certification (d)	10.0			1.0	10.0	2.0	20.0	1.0	2.0	\$2,445	\$0	2
d. Report of Exceedences (e)	10.0			1.0	10.0	2.0	20.0	1.0	2.0	\$2,445	\$0	2
e. Develop process fugives ventilation plan	80.0			1.0	80.0	0.0	0.0	0.0	0.0	\$0	\$0	0
f. Update fugitive dust control plan	10.0			1.0	10.0	0.0	0.0	0.0	0.0	\$0	\$0	0
g. Update baghouse monitoring plan	10.0			1.0	10.0	0.0	0.0	0.0	0.0	\$0	\$0	0
h. Develop bagleak detection system SOP	20.0			1.0	20.0	0.0	0.0	0.0	0.0	\$0	\$0	0
i. Affirmative Defense	30.0			1.0	30.0	0.0	0.0	0.0	0.0	\$0	\$0	0
Reporting Subtotal				762.0	628.3	26.0	588.3	13	58.8	\$49,124	\$920,320	21
4. Recordkeeping Requirements												
A. Read instructions	See 3A										\$0	0
B. Implement activities	N/A										\$0	0
C. Develop record system	N/A										\$0	0
D. Time to enter information												
E. Records of all info. required by standards (f)	1.0			60.0	60.0	0.0	0.0	0.0	0.0	\$0	\$0	0
F. Time to train personnel	20.0			1.0	20.0	2.0	40.0	1.0	4.0	\$4,758	\$0	0
G. Time for audits	N/A							0.0	0.0	\$0	\$0	0
Recordkeeping Subtotal				61.0	80.0	2.0	40.0	1.0	4.0	\$4,758	\$0	0
TOTAL				823.0	708.3	28.0	628.3	14.0	62.8	\$53,882	\$920,320	21.0
							Total Hours	Labor Cost	Non-Labor	Total		
							705	\$53,882	\$920,320	\$	974,202	
										\$344,200		
										\$920,320		

N/A = Not Applicable.

- (a) Costs are based on the following hourly rates: technical at \$111.48, management at \$132.04, and clerical at \$41.75, except the daily VE and Method 22s are \$63.80.
- (b) One-time activity. There are an estimated 2 existing ferroalloys production facilities and no new facilities are expected.
- (c) Occurs every 5 years, initial tests estimated to occur in Year 2 of ICR. Assume the facilities hire a contractor. Costs based on estimates provided by EPA Emissions Measurement Group.
- (d) The 2 existing plants would be required to submit an Annual Compliance Certification at the end of Year 2 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 2 of ICR clearance period for all existing plants.
- (g) Transmittals would include Initial Notifications for 2 plants, Notifications of Compliance Status for 2 plants, Annual Compliance Certifications for 10 plants (combined with exceedence Reports), for an average of (2+2+2)/3 = 2 for each year of the 3-yr ICR clearance period.
- (i) 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 3. YEAR 3 ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR FERROALLOYS PRODUCTION: FERROMANGANESE AND SILICOMANGANESE

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
	Person-hours per occurrence	Stack testing cost per occurrence	Other non-labor costs per occurrence	No. of occurrences per respondent per year	Person-hours per respondent per year (AxD)	Respondents per year	Technical person-hours per year (ExF)	Management person-hours per year (Gx0.05)	Clerical person-hours per year (Gx0.1)	Total labor costs per year	Total non-labor costs per year ((B+C)xDxF)	Total number of responses per year (DxF)
1. Applications	N/A											
2. Survey and Studies	N/A											
3. Reporting Requirements												
A. Read instructions (b)	20.00			1.0	20.0	0.0	0.0	0.0	0.0	\$0	\$0	0
B. Required activities												
a. Initial Compliance test (PM, HCl, Hg, PAH, formaldehyde) - PP FF (c)	15.00	\$200,000		3.0	45.0	0.0	0.0	0.0	0.0	\$0	\$0	0
b. Initial Compliance test (PM, HCl, Hg, PAH, formaldehyde) - NP FF/Scrb (c)	15.00	\$52,000		2.0	30.0	0.0	0.0	0.0	0.0	\$0	\$0	0
c. Initial Compliance test (PM) -- NP FF(c)	20.00	\$10,000		4.5	90.0	0.0	0.0	0.0	0.0	\$0	\$0	0
d. Initial Method 9 (c)	4.00	\$2,000		1.5	6.0	0.0	0.0	0.0	0.0	\$0	\$0	0
e. Manganese ore sampling	2.00		\$200	3.0	6.0	2.0	12.0	1.0	1.2	\$1,520	\$1,200	0
f. Daily VE check (5 control devices)	0.25			365.0	91.3	1.0	91.3	0.5	9.1	\$6,269	\$0	0
g. Daily VE check (8 control devices)	0.40			365.0	146.0	1.0	146.0	0.5	14.6	\$676	\$0	0
h. Pressure drop/liquid flow rate CPMS-scrubber												
Initial Capital	2.00		\$50,000	1.0	0.0	0.0	0.0	0.0	0.0	\$0	\$0	0
Annual (O&M)	2.0		\$18,000	1.0	2.0	1.0	2.0	0.5	0.2	\$297	\$18,000	0
i. Carbon injection rate CPMS												
Initial Capital	2.0		\$20,000	1.0	0.0	0.0	0.0	0.0	0.0	\$0	\$0	0
Annual (O&M)	2.0		\$6,200	1.0	2.0	1.0	2.0	0.5	0.2	\$297	\$6,200	0
j. Bag Leak Detection System												
Initial Capital	4.0		\$265,000	0.5	0.0	0.0	0.0	0.0	0.0	\$0	\$0	0
Annual (O&M)	4.0		\$94,000	0.5	2.0	2.0	4.0	1.0	0.4	\$595	\$94,000	0
k. Differential pressure monitor												
Initial Capital	2.0		\$2,300	2.0	0.0	0.0	0.0	0.0	0.0	\$0	\$0	0
Annual (O&M)	2.0		\$230	2.0	4.0	2.0	8.0	1.0	0.8	\$1,057	\$920	0
C. Create information	See 3B										\$0	
D. Gather existing information	See 3B										\$0	
E. Write report											\$0	
a. Initial Notification	N/A											
b. Notification of Compliance Status	4.0			1.0	4.0	0.0	0.0	0.0	0.0	\$0	\$0	0
c. Annual Compliance Certification (d)	10.0			1.0	10.0	2.0	20.0	1.0	2.0	\$2,445	\$0	2
d. Report of Exceedences (e)	10.0			1.0	10.0	2.0	20.0	1.0	2.0	\$2,445	\$0	2
e. Develop process fugives ventilation plan	80.0			1.0	80.0	0.0	0.0	0.0	0.0	\$0	\$0	0
f. Update fugitive dust control plan	10.0			1.0	10.0	0.0	0.0	0.0	0.0	\$0	\$0	0
g. Update baghouse monitoring plan	10.0			1.0	10.0	0.0	0.0	0.0	0.0	\$0	\$0	0
h. Develop bagleak detection system SOP	20.0			1.0	20.0	0.0	0	0	0	\$0	\$0	0
i. Affirmative Defense	30.0			1.0	30.0	0.0	0.0	0.0	0.0	\$0	\$0	0
Reporting Subtotal				762.0	618.3	14.0	305.3	7	30.5	\$15,601	\$120,320	4
4. Recordkeeping Requirements												
A. Read instructions	See 3A										\$0	0
B. Implement activities	N/A										\$0	0
C. Develop record system	N/A										\$0	0
D. Time to enter information												
E. Records of all info. required by standards (f)	1.0			60.0	60.0	0.0	0.0	0.0	0.0	\$0	\$0	0
F. Time to train personnel	20.0			1.0	20.0	2.0	40.0	1.0	4.0	\$4,758	\$0	0
G. Time for audits	N/A							0.0	0.0	\$0	\$0	0
Recordkeeping Subtotal				61.0	80.0	2.0	40.0	1.0	4.0	\$4,758	\$0	0
TOTAL				823.0	698.3	16.0	345.3	8.0	34.5	\$20,359	\$120,320	4.0
							Total Hours	Labor Cost	Non-Labor	Total		
							388	\$20,359	\$120,320	\$	140,679	
										\$0		
										\$120,320		

N/A = Not Applicable.

- (a) Costs are based on the following hourly rates: technical at \$111.48, management at \$132.04, and clerical at \$41.75, except the daily VE and Method 22s are \$63.80.
- (b) One-time activity. There are an estimated 2 existing ferroalloys production facilities and no new facilities are expected.
- (c) Occurs every 5 years, initial tests estimated to occur in Year 2 of ICR. Assume the facilities hire a contractor. Costs based on estimates provided by EPA Emissions Measurement Group.
- (d) The 2 existing plants would be required to submit an Annual Compliance Certification at the end of Year 2 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 2 of ICR clearance period for all existing plants.
- (g) Transmittals would include Initial Notifications for 2 plants, Notifications of Compliance Status for 2 plants, Annual Compliance Certifications for 10 plants (combined with exceedence Reports), for an average of (2+2+2)/3 = 2 for each year of the 3-yr ICR clearance period.
- (i) 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. SUMMARY OF ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDING FOR FERROALLOYS PRODUCTION: FERROMANGANESE AND SILICOMANGANESE

Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Cost
1	320	32	5	357	\$37,723
2	628	63	14	705	\$53,882
3	345	35	8	388	\$20,359
Total	1,294	129	27	1,450	\$111,964
Average	431	43	9	483	\$37,321

KEEPING REQUIREMENTS FOR

Non-Labor (annualized Capital/Startup and O&M) Costs	Total Costs
\$0	\$37,723
\$920,320	\$974,202
\$120,320	\$140,679
\$1,040,640	\$1,152,604
\$346,880	\$384,201

TABLE 5. YEAR 1 ANNUAL BURDEN AND COST TO THE FEDERAL GOVERNMENT FOR FERROALLOYS PRODUCTION: FERROMANGANESE AND SILICOMANGANESE

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	(F) Management person-hours per year	(G) Clerical person-hours per year (Ex0.1)	(H) Cost,\$ (a)
Report Review								
Initial Notification (b)	1.0	1.0	1.0	0.7	0.7	0.0	0.1	\$35
Notification of Compliance Status (c)	10.0	1.0	10.0	0.7	6.7	0.3	0.7	\$345
Annual Compliance Certification (d)	2.0	1.0	2.0	2.0	4.0	0.2	0.4	\$207
Report of Exceedence (e)	2.0	1.0	2.0	2.0	4.0	0.2	0.4	\$207
Review compliance monitoring plans prepared by plants	10.0	0.0	0.0	2.0	0.0	0.0	0.0	\$0
TOTAL BURDEN AND COST (SALARY)					15.3	0.8	1.5	\$795

- (a) Costs are based on the following hourly rates: technical at \$46.21, management at \$62.27, and clerical at \$25.01. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.
- (b) The affected 2 plants will submit the initial notification, leading to an average annual burden of 0.7 plants/yr in Year 1.
- (c) The affected 2 plants will submit the notification of compliance status, leading to an average annual burden of 0.7 plants/yr in Year 1.
- (d) The affected 2 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.

Total hours 18

TABLE 6. YEAR 2 ANNUAL BURDEN AND COST TO THE FEDERAL GOVERNMENT FOR FERROALLOYS PRODUCTION: FERROMANGANESE AND SILICOMANGANESE

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	(F) Management person-hours per year	(G) Clerical person-hours per year (Ex0.1)	(H) Cost,\$ (a)
Report Review								
Initial Notification (b)	1.0	1.0	1.0	0.7	0.7	0.0	0.1	\$35
Notification of Compliance Status (c)	10.0	1.0	10.0	0.7	6.7	0.3	0.7	\$345
Annual Compliance Certification (d)	2.0	1.0	2.0	2.0	4.0	0.2	0.4	\$207
Report of Exceedence (e)	2.0	1.0	2.0	2.0	4.0	0.2	0.4	\$207
Review compliance monitoring plans prepared by plants	10.0	4.0	40.0	2.0	80.0	4.0	8.0	\$4,146
TOTAL BURDEN AND COST (SALARY)					95.3	4.8	9.5	\$4,940

- (a) Costs are based on the following hourly rates: technical at \$46.21, management at \$62.27, and clerical at \$25.01. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.
- (b) The affected 2 plants will submit the initial notification, leading to an average annual burden of 0.7 plants/yr in Year 1.
- (c) The affected 2 plants will submit the notification of compliance status, leading to an average annual burden of 0.7 plants/yr in Year 1.
- (d) The affected 2 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.

Total hours 110

TABLE 7. YEAR 3 ANNUAL BURDEN AND COST TO THE FEDERAL GOVERNMENT FOR FERROALLOYS PRODUCTION: FERROMANGANESE AND SILICOMANGANESE

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	(F) Management person-hours per year	(G) Clerical person-hours per year (Ex0.1)	(H) Cost,\$ (a)
Report Review								
Initial Notification (b)	1.0	1.0	1.0	0.7	0.7	0.0	0.1	\$35
Notification of Compliance Status (c)	10.0	1.0	10.0	0.7	6.7	0.3	0.7	\$345
Annual Compliance Certification (d)	2.0	1.0	2.0	2.0	4.0	0.2	0.4	\$207
Report of Exceedence (e)	2.0	1.0	2.0	2.0	4.0	0.2	0.4	\$207
Review compliance monitoring plans prepared by plants	10.0	0.0	0.0	2.0	0.0	0.0	0.0	\$0
TOTAL BURDEN AND COST (SALARY)					15.3	0.8	1.5	\$795

- (a) Costs are based on the following hourly rates: technical at \$46.21, management at \$62.27, and clerical at \$25.01. Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.
- (b) The affected 2 plants will submit the initial notification, leading to an average annual burden of 0.7 plants/yr in Year 1.
- (c) The affected 2 plants will submit the notification of compliance status, leading to an average annual burden of 0.7 plants/yr in Year 1.
- (d) The affected 2 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.

Total hours 18

TABLE 8. SUMMARY OF ANNUAL BURDEN AND COST TO THE FEDERAL GOVERNMENT FOR FERROALLYS PRODUCTION: FERROMANGANES AND SILICOMANGANES

Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Cost
1	15	2	1	18	\$795
2	95	10	5	110	\$4,940
3	15	2	1	18	\$795
Total	126	13	6	145	\$6,530
Average	42	4	2	48	\$2,177

CALCULATIONS NEEDED FOR ROCIS
Part I: Information Collection Request
14. Annual Cost to Federal Government
 \$794.61

Part II: Information Collection Detail

9. Respondents

Total number: 2
 Small entity number: 0

10. Frequency

Calculated Annual Frequency: 1.0
 Calculated Annual Number of Responses: 12

11. Hour and Cost Burden

	Hours per Response	% of responses	Avg. hours per response	Total Annual Hour Burden	Cost per Response (Capital/Startup and O&M Costs)	Total Annual Cost Burden (Capital/Startup and O&M Costs)	Comments
Reporting	1.85	0.32	12.88	154.69	\$28,906.67	\$346,880	Hours per response based on year 1. Used 3-yr avg. burden to estimate total annual hour burden.
Recordkeeping	3.93	0.68	27.37	328.72	\$0.00	\$0.00	Hours per response based on year 1. Used 3-yr avg. burden to estimate total annual hour burden.
Third Party Disclosure					\$0		
Totals	5.78		40.25	483.42	\$28,907	\$346,880	

12. Allocate the change in Burden

	Total Requested			Change Due to New Statute	Change Due to Agency Decision	Due to Agency Estimate	Change due to Violation	Currently Approved	Comments
Annual Responses	12								
Annual Hour Burden	483								
Annual Cost Burden (Capital/Startup and O&M Costs)	\$346,880								

Bag leak detection system

Capital Annual

Felman

3 PP FF	141000	118086 based on 4 sensor system from the Monitoring Costs and Benefits tool
1 NP FF	32037	25248 based on 2 sensor system from the Monitoring Costs and Benefits tool

Eramet

3 NP FF	96111	75744 based on 2 sensor system from the Monitoring Costs and Benefits tool
	269148	219078