

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ)
(Renewal), EPA ICR Number 2267.03, OMB Control Number 2060-0605

1(b) Short Characterization/Abstract

The final rule for National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) published on January 2, 2008 (73 FR 225). Potential respondents are owners or operators of any existing or new iron or steel foundry that is an area source of hazardous air pollutants (HAP) emissions. Research and development facilities are not covered by the rule. Foundries covered by the rule would not be required to obtain a Title V operating permit.

There are different requirements for foundries based on size. Small iron and steel foundries are required to comply with pollution prevention management practices for scrap materials, the removal of mercury switches, and binder formulations. Large iron and steel foundries are required to comply with the same pollution prevention management practices as small foundries in addition to emissions limitations for melting furnaces and foundry operations. Existing foundries with an annual metal melt production greater than 20,000 tons and new foundries with an annual metal melt capacity greater than 10,000 tons are classified as large foundries. Existing foundries with an annual metal melt production of 20,000 tons or less and new foundries with an annual metal melt capacity of 10,000 tons or less are classified.

For metallic scrap, the pollution prevention management practices require foundries to purchase (or otherwise obtain) the motor vehicle scrap only from scrap providers participating in an EPA-approved program for the removal of mercury switches or to comply with alternative provisions. The requirements for binder formulations require foundries to use on one type of production line chemical formulations that do not contain methanol as a specific ingredient of the catalyst formulation. The management practices also include a pollution prevention initiative to encourage foundries to investigate and switch to non-HAP binders and coating materials by requiring records of the annual quantity and composition of each HAP-containing chemical binder or coating material used to make molds and cores. The NESHAP allows foundries 2 years after promulgation to comply with the management practices for mercury, 1 year to comply with the opacity limit for melt shops, and 6 months for other requirements.

Small foundries would submit two types of one-time notifications required by the NESHAP general provisions and keep records of specific information to demonstrate compliance

with the rule requirements. The final rule also requires small foundries to calculate for each calendar month their 12-month rolling average production rate to ensure that the facility continues to meet the size criteria that defines a small iron and steel foundry. Records of the monthly production rate and monthly rolling average calculations are required. A small foundry must report any deviation from these requirements within 30 days.

Large area source foundries are required to comply with the pollution prevention management practices in addition to emissions standards for metal melting furnaces and foundry operations. The owner or operator may elect to comply with emissions limits for particulate matter (PM) or total metal HAP. The final rule contains provisions for demonstrating compliance with the limits using emissions averaging. The owner or operator of an existing affected source is required to conduct initial and periodic visual inspections of PM control devices (baghouses, wet scrubbers, electrostatic precipitators). Foundries using a baghouse to comply with the PM emission limit may choose to install and operate a bag leak detection system instead of conducting the initial and periodic inspections. Bag leak detection systems are required at new foundries. New source foundries must use a continuous parameter monitoring system (CPMS) to measure and record pressure drop and scrubber water flow rate for a wet scrubber and/or a CPMS to measure and record the hourly average voltage and secondary current (or total power input) to an electrostatic precipitator. Monthly inspections of capture systems are also be required. An operation and maintenance plan for control devices also is required. Foundries also must conduct an opacity test at least every 6 months to demonstrate compliance with an opacity limit for fugitive emissions from buildings or structures housing foundry operations. Alternatively, foundries may conduct semiannual visible emissions observations by Method 22. The Method 22 test is considered successful if no visible emissions are observed for 90 percent of a 1-hour test. A Method 9 opacity test is required if the Method 22 test is not successful.

Large foundries will demonstrate initial compliance with emissions limits through performance tests. The owner or operator of an existing area source may certify initial compliance based on the results of a previous performance test that meets the rule requirements. Subsequent performance tests for furnaces are to be performed every 5 years. Provisions also are included for demonstrating compliance through emissions averaging. A facility that uses emissions averaging must conduct monthly compliance determinations by calculating the weighted average emissions for furnaces in the emissions averaging group. Consistent with the NESHAP General Provisions, large foundries are required to submit one-time notifications; comply with requirements for startup, shutdown, and malfunction (SSM) plans and reports; submit semiannual excess emissions and monitoring system performance reports; and maintain records of specific information to ensure that the rule requirements are being achieved and maintained.

Any owner or operator subject to the provisions of this part will maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Approximately 427 respondents are currently subject to the regulation, and it is estimated that no additional respondents per year will become subject to the regulation in the next three years.

In the United States, there are approximately 427 iron and steel foundries that are owned and operated by the iron and steel foundry industry. None of these 427 facilities are owned by state, local, tribal, or the Federal government. They are owned and operated by privately owned for-profit businesses. You can find the burden to the “Affected Public” listed below in Table 1: Annual Respondent Burden and Cost - NESHAP for Iron and Steel Foundry (40 CFR Part 63, Subpart ZZZZZ). The Federal government burden does not include work performed by Federal employees. The burden refers only to work performed by contractors, which could be found listed below in Table 2: Average Annual EPA Burden - NESHAP for Iron and Steel Foundry (40 CFR Part 63, Subpart ZZZZZ).

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

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 (HAP). These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or 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, HAP emissions from cellulose products manufacturing cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP for this source category was promulgated at 40 CFR part 63, subpart ZZZZZ.

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.

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate the control equipment in compliance with the regulation.

3. Nonduplication, Consultations, and Other Collection Criteria

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

3(a) Nonduplication

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 their 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 (76 FR 26900) on May 9, 2011. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is

operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed.

After a thorough review of comments, it is our policy to respond to those received since the last ICR renewal, as well as to those submitted in response to the First Federal Register Notice.

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 that 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

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

These standards require the respondents to maintain all records, including reports and notification for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond the five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are iron foundries and steel foundries. The North American Industry Classification System (NAICS) codes for the respondents affected by the standards are 331511, 331512, and 331513.

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 for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ).

Source Data and Information Requirements, summarize the data items, including recordkeeping and reporting requirements are found in Attachment 1.

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

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 zero percent of the respondents use electronic reporting.

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CEMS for opacity, or for pressure drop and liquid supply pressure for control device.
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.

Respondent Activities
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., continuous parameter monitoring system. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

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 five 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 500 employees. A total of 319 of the 427 iron and steel foundries are small entities. Approximately 45 percent (37 of 83) of the large iron and steel foundries (annual metal melt production greater than 20,000 tons) are owned by small entities while 85 percent (292 of 344) of the small iron and steel iron and steel foundries are owned by small entities. The final rule includes a specific compliance option for small foundries that provides a maximum degree of operational flexibility, and the ICR requirements are the minimum necessary to demonstrate compliance. Since proposal, we have further reduced the impacts on small entities by increasing the threshold definition for a small foundry from an annual melt production of 10,000 tons to 20,000 tons. Our analyses show that the final NESHAP will not result in a significant economic impact on a substantial number of small entities. No small entities are expected to incur an economic impact that is greater than 3 percent of its revenue. The number of foundries that may incur an economic impact greater than 1 percent of their revenues ranges from an average of 9 to a maximum (at the 98th percentile) of 13.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 2A and 2B: Annual Respondent Burden and Cost, NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (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. Wherever 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 6,024 (Total Labor Hours from Table 2A, and 2B). 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

This ICR uses the following labor rates:

Managerial	\$97.99 (\$46.66 + 110%)
Technical	\$72.09 (\$34.33 + 110%)
Clerical	\$33.16 (\$15.79 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2006, "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

As shown in Table 2B, the estimate of capital costs for large foundries is \$59,620 with no O&M costs. This cost does not include the cost of any monitoring equipment because the final rule requires visual inspections instead of automated monitoring equipment at existing affected sources. This cost does include the cost of a file cabinet for data storage.

(iii) Capital/Startup vs. Operating and Maintenance (O&M) Costs

The estimate of capital/startup costs versus O&M costs is shown in Table 2B. No O&M costs would occur over the 3-year period of this ICR.

(iv) Annualizing Capital Costs

Table 2B shows an estimate of the annualized cost of capital to be \$8,490 per year.

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 \$32,917.

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

Managerial	\$58.18 (GS-13, Step 5, \$36.36 + 60%)
Technical	\$47.97 (GS-12, Step 1, \$26.98 + 60%)

Clerical \$22.66 (GS-6, Step 3, \$14.60 + 60%)

These rates are from the Office of Personnel Management (OPM) “2007 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 in Table 2: Average Annual EPA Burden, NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal).

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

There are 427 existing iron and steel foundries. No new sources are expected during the next 3 years. Consequently, the average annual number of respondents during the 3 year period of this ICR is 142.33. A total of 344 of the 427 facilities are foundries with a metal melting rate of 20,000 tpy or less and 83 have metal melting rates greater than 20,000 tpy. Consequently, the average annual number of small foundries during the 3-year period of this ICR is 114.67 and the average annual number of large foundries is 27.67.

The only components of the total annual responses for small foundries attributable to this ICR are two one-time initial notifications for each facility. Large foundries are required to submit two one-time initial notifications; prepare an operation and maintenance plan and a startup, shutdown, and malfunction plan, and submit semiannual compliance reports. The number of total annual responses for Subpart ZZZZZ is estimated as: (114.67 annual average respondents × 1 notification) + (114.67 annual average respondents × 1 notification) + (27.67 annual average respondents × 1 deviations report) + (27.67 annual average respondents × 2 written plans) + (27.67 annual average respondents × 2 semiannual reports). Therefore, the number of total annual responses for Subpart ZZZZZ is 367.7.

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

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 2A, 2B, and 3, respectively, and summarized below.

(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 monitoring, recordkeeping, and reporting requirements in Subpart ZZZZZ for small foundries is 3,555 person hours with an annual average cost of \$248,288 with no capital and O&M costs. The average annual burden for the monitoring, recordkeeping, and reporting requirements in Subpart ZZZZZ for large foundries is 2,469 person hours with an annual average cost of \$172,430; the annualized capital cost is \$8,490 with no operation and maintenance costs. The average annual burden for the monitoring, recordkeeping, and reporting requirements in Subpart ZZZZZ for all iron and steel foundry area sources is 6,024

person hours with an annual average cost of \$420,718 with annualized capital costs of \$8,490 and no O&M costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 712 labor hours at a cost of \$32,917. See Table 3. Annual Agency Burden and Cost: NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal).

6(f) Reasons for Change in Burden

There is no change in the labor hours or cost to the respondents in this ICR compared to the previous ICR. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate according to the industry sources is very low, negative or non-existent, so there is no significant change in the overall burden. There are no new facilities expected to be constructed over the next three years of this ICR. Therefore, the labor hours and cost figures in the previous ICR reflect the current burden on the respondents and are reiterated in this ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 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 the 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-2011-0229, which is available for online viewing at www.regulations.gov, or in person viewing at the Enforcement and Compliance Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. 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 Enforcement and Compliance Docket is (202) 566-1752. An electronic version of the public docket is available at

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 the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2011-0229 and OMB Control Number 2060-0605 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

ATTACHMENT 1. INFORMATION REQUIREMENTS

Requirement for new and existing sources	Citation for small foundries	Citation for large foundries	Citation for NESHAP general provisions
Initial and periodic inspections for baghouses, wet scrubber, and electrostatic precipitator at existing source;	NA	§63.10897(a)	NA
CPMS for wet scrubber at new source	NA	§63.10897(b)	NA
CPMS for electrostatic precipitator at new source	NA	§63.10897(c)	NA
BLDS or inspections for baghouse at existing source; BLDS for baghouse at new source.	NA	§63.10897(d)	NA
Monthly capture system inspections	NA	§63.10897(e)	NA
Semiannual opacity tests	NA	§63.10898(i)	NA
CMS performance evaluation	NA	NA	
Metal melting furnaces and fugitive emissions	NA	§63.10898	40 CFR 63.7
CMS performance evaluation	NA	NA	40 CFR 63.8(e)(3)
Notification of applicability	§63.10890(b)	§63.10900(a), Table 3	40 CFR 63.9(b)(2)
Notification of construction/ reconstruction ¹	§63.10890(f)	§63.10900(a), Table 3	40 CFR 63.9(b)(5)
Notification of special compliance requirements ¹	§63.10890(f)	§63.10900(a), Table 3	40 CFR 63.9(d)
Notification of performance test	NA	§63.10900(a), Table 3	40 CFR 63.9(c)
Notification of opacity/VE observations	NA	§63.10900(a), Table 3	40 CFR 63.9(f)
Additional CMS notifications	NA	NA	40 CFR 63.9(g)
Notification of compliance status	§63.10890(c)	§63.10900(a), Table 3	40 CFR 63.9(h)(1)
Notification of changes in information ¹	§63.10890(f)	§63.10900(a), Table 3	40 CFR 63.9(j)
Scrap management material specifications	§63.10885(b),(c)		NA
Operation and maintenance plan	NA	§63.10896(a)	NA
Startup, shutdown, and malfunction plan	NA	§63.10900(a), Table 3	40 CFR 63.6(e)(3)
Performance test plan	NA	§63.10900(a), Table 3	40 CFR 63.7(c)(2)
CMS quality control plan	NA	§63.10900(a), Table 3	40 CFR 63.8(d)
CMS performance evaluation test plan	NA	NA	40 CFR 63.8(e)(3)
Information to support notifications	§63.10890(e)(1)	§63.10900(a), Table 3	40 CFR 63.10(b)(2)
Material specifications	§63.10890(e)(2)	§63.10899(b)(1)	NA
Mercury	§63.10890(e)(3)-(4)	§63.10899(b)(2)-(3)	NA
Nonmethanol binder chemical formulations	§63.10890(e)(5)	§63.10899(b)(4)	NA
Annual quantity and composition of each HAP-containing chemical binder or coating material	§63.10890(e)(6)	§63.10899(b)(5)	NA
Metal melt production	§63.10890(e)(7)	§63.10899(b)(6)	
Operation and maintenance plan	NA	§63.10899(b)(7)	NA
If applicable, emissions averaging plan	NA	§63.10899(b)(8)	NA
Bag leak detection system (new sources)	NA	§63.10899(b)(9)	NA
Capture system inspections	NA	§63.10899(b)(10)	NA
CPMS specifications	NA	§63.10899(b)(11)	NA
Corrective action	NA	§63.10899(b)(12)	NA
PM control device log of inspections/maintenance	NA	§63.10899(b)(13)	NA
Semiannual excess emissions/deviation reports	§63.10890(f)	§63.10899(c), Table 3	40 CFR 63.10(e)(3)
Initial performance test report	NA	§63.10900(a), Table 3	40 CFR 63.7(e)(1)

CMS performance evaluation report	NA	NA	40 CFR 63.8(e)(5)
SSM reports	NA	§63.10900(a), Table 3	40 CFR 63.6(e)(3)

¹ Requirement is not expected to occur during the 3-year term of this ICR

Table 2A: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal)

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent	(C) Person- hours per respondent (C=A*B)	(D) Respondents per year ^a	(E) Technical person-hours per year (E=C*D)	(F) Management person-hours per year (E*0.05)	(G) Clerical person- hours per year (E*0.1)	(H) Cost ^b , \$
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	4	1	4	114.67	458.68	22.934	45.868	\$36,836
B. Required activities								
Scrap specifications	4	1	4	114.67	458.68	22.934	45.868	\$36,836
Monthly rolling average calculation	0.25	12	3	114.67	344.01	17.2005	34.401	\$27,627
No methanol binder formulation ^c	0	0	0	0	0	0	0	\$-
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Initial notification of applicability	2	1	2	101	202	10.1	20.2	\$16,222
Notification of compliance status	4	1	4	114.67	458.68	22.934	45.868	\$36,836
Deviations report	1	1	1	57.34	57.34	2.867	5.734	\$4,605
Notification of construction/reconstruction	N/A							
Notification of anticipated startup	N/A							
Notification of actual startup	N/A							
Notification of special compliance requirements	N/A							
Request for compliance extension	N/A							
Notification of performance test	N/A							
Site specific test plan	N/A							
Notification of performance evaluation	N/A							
Quality assurance plan for CEMS/COMS	N/A							
NESHAP waiver request	N/A							

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent	(C) Person- hours per respondent (C=A*B)	(D) Respondents per year ^a	(E) Technical person-hours per year (E=C*D)	(F) Management person-hours per year (E*0.05)	(G) Clerical person- hours per year (E*0.1)	(H) Cost ^b , \$
Startup, shutdown, and malfunction plan/reports	N/A							
Semiannual excess emissions reports	N/A							
Subtotal for Reporting Requirements						2,276.4185		
5. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 4A							
C. Implement activities	See 4A							
D. Develop record system	2	1	2	114.67	229.34	11.467	22.934	\$18,418
E. Time to enter information ^d	0.1	52	5.2	114.67	596.284	29.8142	59.6284	\$47,886
F. Time to transmit or disclose information	0.25	2	0.5	114.67	57.335	2.86675	5.7335	\$4,604
G. Time to adjust existing ways	2	1	2	114.67	229.34	11.467	22.934	\$18,418
F. Time to train personnel ^e	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						1,279.14385		
TOTAL LABOR BURDEN AND COST						3,555		\$248,288
Annualized cost of capital								\$0
Operation and maintenance (O&M)								\$0
Total (capital recovery plus O&M)								\$0

N/A = not applicable.

^a We have assumed that there are 427 existing iron and steel foundries that area sources. No new sources are projected during the 3-year term of this ICR. Therefore, the average number of total respondents per year is 142.33. A total of 344 of the 427 facilities are small foundries and 83 are large foundries. Consequently, the average number of small foundries during the 3-year period of this ICR is 114.67 and the average number of large foundries is 27.67. No new sources are expected during the next 3 years. For the purposes of deviation reports, 1 report per year is estimated for one-half (50.5) of the 114.67 respondents per year.

^b This ICR uses the following labor rates: The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$72.09, management at \$97.99, and clerical at \$33.16. Technical, management, and clerical average hourly rates for private industry workers in the foundry industry (NAICS 331500) were taken from the United States Department of Labor, Bureau of Labor Statistics, May 2006 available at <http://www.bls.gov>. The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c We have assumed that no burden would be incurred for this requirement because all small area source foundries are already meeting the no methanol requirement.

^d We have assumed that small foundries must record information to demonstrate compliance with pollution prevention management practices for metallic scrap and binder formulations.

^e We have assumed that no cost would be incurred to train personnel.

TABLE 2B. Annual Respondent Burden and Cost for Large Foundries – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal)

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent	(C) Person-hours per respondent (C=A*B)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=C*D)	(F) Management person-hours per year (E*0.05)	(G) Clerical person-hours per year (E*0.1)	(H) Cost ^b , \$
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	8	1	8	27.67	221.4	11.1	22.1	\$17,777
B. Required activities								
Scrap material specifications	4	1	4	27.67	110.7	5.5	11.1	\$8,889
Prepare operation & maintenance plan	8	1	8	27.67	221.4	11.1	22.1	\$17,777
No methanol binder formulation ^c	4	1	4	0.67	2.68	0.134	0.268	\$215
Initial/subsequent performance tests ^d	0	0	0	0	0.0	0.0	0.0	\$0
Initial and periodic inspections of PM control devices, monthly inspection of capture systems ^d	0	0	0	0	0.0	0.0	0.0	\$0
Monthly emissions averaging calculations ^d	0	0	0	0	0.0	0.0	0.0	\$0
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Initial notification of applicability	4	1	4	27.67	110.7	5.5	11.1	\$8,889
Notification of compliance status	8	1	8	27.67	221.4	11.1	22.1	\$17,777
Notification of construction/reconstruction	N/A							
Notification of anticipated startup	N/A							
Notification of actual startup	N/A							
Notification of special compliance requirements	N/A							
Request for compliance extension	N/A							
Notification of performance test ^d	1	1	1	27.67	27.7	1.4	2.8	\$2,222
Site specific test plan ^d	0	0	0	0	0.0	0.0	0.0	\$0
Notification of performance evaluation	N/A							
Quality assurance plan for CEMS/COMS	N/A							

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent	(C) Person-hours per respondent (C=A*B)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=C*D)	(F) Management person-hours per year (E*0.05)	(G) Clerical person-hours per year (E*0.1)	(H) Cost ^b , \$
NESHAP waiver request	N/A							
Startup, shutdown, and malfunction plan/reports	4	1	4	27.67	110.7	5.5	11.1	\$8,889
Semiannual excess emissions reports ^d	2	2	4	27.67	110.7	5.5	11.1	\$8,889
Subtotal for Reporting Requirements						1,307.982		
5. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	See 4A							
C. Implement activities	See 4A							
D. Develop record system	4	1	4	27.67	110.7	5.5	11.1	\$8,889
E. Time to enter information ^e	0.5	52	26	27.67	719.4	36.0	71.9	\$57,775
F. Time to transmit or disclose information	0.25	2	1	27.67	13.8	0.7	1.4	\$1,111
G. Time to adjust existing ways	2	1	2	27.67	55.3	2.8	5.5	\$4,444
F. Time to train personnel ^f	4	1	4	27.67	110.7	5.5	11.1	\$8,889
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						1,161.4		
TOTAL LABOR BURDEN AND COST						2,469		\$172,430
Annualized cost of capital ^g								\$8,490
Operation and maintenance (O&M) ^h								\$0
Total (capital recovery plus O&M) ^g								\$8,490

N/A = not applicable.

^a We have assumed that there are 427 existing iron and steel foundries that are sources. No new sources are projected during the 3-year term of this ICR. Therefore, the average number of respondents per year is 142.33. A total of 344 of the 427 facilities are small foundries and 83 are large foundries. Consequently, the average number of small foundries during the 3-year period of this ICR is 114.67 and the average number of large foundries is 27.67.

^b This ICR uses the following labor rates: The fully-burdened hourly wage rates used to represent respondent labor costs are: technical at \$72.09, management at \$97.99, and clerical at \$33.16. Technical, management, and clerical average hourly rates for private industry workers in the foundry industry (NAICS 331500) were taken from the United States Department of Labor, Bureau of Labor Statistics, May 2006 available at <http://www.bls.gov>. The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c We assumed that two large area source foundries (2 foundries over 3 years = 0.67 foundries per year) are expected to have to change formulations to meet the no methanol requirement.

^d We have assumed that these activities are not expected to occur during the first 3 years of this ICR.

^e We have assumed that large foundries must record information to demonstrate compliance with pollution prevention management practices for metallic scrap and binder formulations and information to demonstrate compliance with monitoring; inspection; operation and maintenance; startups, shutdowns, and malfunctions; and other requirements of the General Provisions (40 CFR part 63, subpart A).

^f We have assumed that large foundries are expected to monitor visible emissions using a trained employee.

^g Based on capital cost of \$59,620 for file storage cabinets, 7 percent interest, and 20-year equipment life (capital recovery factor = 0.142). No costs for monitoring equipment are estimated because no monitoring equipment is required for existing foundries.

Total Burden Hours, Costs and Annualized Cost of Capital From 2A and 2B:

Tables	Burden Hours	Burden Cost	Annualized Cost of Capital
2A	3,555	\$248,288	\$0
2B	2,469	\$172,430	\$8,490
Totals	6,024	\$420,718	\$8,490

Table 3: Average Annual EPA Burden - NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal)

Burden Item	(A) Person hours per occurrence	(B) Occurrences per respondent	(C) Plants per year^a	(D) Technical hours/year (D=A*B*C)	(E) Management hours/year (E=0.05*D)	(F) Clerical hours/year (F=0.1*D)	(G) Cost^b, \$
Report Review:							
Initial notification of applicability	1	1	142.33	142.3	7.1	14.2	\$7,564
Deviation reports	1	1	50.1	50.1	2.5	5.0	\$2,662
Startup, shutdown, malfunction plan/report	2	1	142.33	142.3	7.1	14.2	\$7,564
Notification of compliance status	2	1	142.33	142.3	7.1	14.2	\$7,564
Semiannual excess emissions report	2	1	142.33	142.3	7.1	14.2	\$7,564
TOTAL BURDEN AND COST					712.3		\$32,917

^a There are 427 existing iron and steel foundries that are area sources. No new sources are projected during the 3-year term of this ICR. Therefore, the average number of respondents per year is 142.33. .

^b This ICR uses the following average hourly labor rates: 58.18 for managerial (GS-13, Step 5, \$36.36 x 1.6), \$43.14 (GS-12, Step 1, \$29.98 x 1.6) for technical and \$22.66 (GS-6, Step 3, \$14.16 x 1.6) for clerical. These rates are from the Office of Personnel Management (OPM) 2007 General Schedule which excludes locality rates of pay.