SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Integrated Iron and Steel Manufacturing (40 CFR Part 63, Subpart FFFFF) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Integrated Iron and Steel Manufacturing (40 CFR Part 63, Subpart FFFFF**)** (Renewal), EPA ICR Number 2003.05, OMB Control Number 2060-0517

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel Manufacturing were proposed on 1July 13, 2001 (66 FR 36835), promulgated on May 20, 2003 (68 FR 27645), and amended on July 13, 2006 (71 FR 39579). These standards apply to new and existing sinter plants, blast furnaces, and basic oxygen process furnace (BOPF) shops at integrated iron and steel manufacturing facilities that are major sources of hazardous air pollutants (HAPs), or are collocated at major sources. Existing facilities include those that commenced construction or reconstruction before July 13, 2001. This information is being collected to assure compliance with 40 CFR part 63, subpart FFFFF.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall 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 U. S. Environmental Protection Agency (EPA) regional office.

Based on our consultations with industry representatives, there is an average of two affected facility at each plant site, and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 18 respondents per year will be subject to the standard, and no additional respondent per year will become subject to the standard.

All of the integrated iron and steel facilities in the United States are owned and operated by the integrated iron and steel industry (the “Affected Public”). None of the facilities in the

United States are owned by state, local, tribal or the Federal government. They are privately-owned, for-profit businesses. The burden to the "Affected Public" is listed below in Table 1: Annual Respondent Burden and Cost − NESHAP for Integrated Iron and Steel Manufacturing (40 CFR Part 63, Subpart FFFFF**)** (Renewal). The Federal government burden associated with the review of reports submitted by the respondent is shown below in Table 2: Average Annual EPA Burden and Cost − NESHAP for Integrated Iron and Steel Manufacturing (40 CFR Part 63, Subpart FFFFF**)** (Renewal).

The active (previous) ICR had the following Terms of Clearance (TOC):

> When this ICR is renewed, EPA should review the respondent burden, universe, response number, labor rates, and capital costs and ensure these estimates have been updated.

EPA has addressed each item of concern by consulting with industry representatives regarding the burden associated with this ICR (including universe of affected entities, the number of responses, the respondent burden, and capital costs) and updating the labor rates using the most recent information available from the Bureau of Labor Statistics.

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 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 integrated iron and steel plants cause or contribute to air pollution that may reasonably be anticipated to endanger either public health or welfare. Therefore, the NESHAP standards were promulgated for this source category at 40 CFR part 63, subpart FFFFF.

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 check if 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 required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

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

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

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 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 has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. 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. In developing this ICR, we contacted: 1) the American Iron and Steel Institute, at (202) 452-7100; 2) the Association for Iron and Steel Technology, at (724) 814-3062; and 3) the Steel Manufacturers Association, at (202)-296-1515.

It is our policy to respond after a thorough review of comments 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 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 established by OMB at 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications 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 either 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 (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 owners or operators of integrated iron and steel manufacturing facilities**.** The United States Standard Industrial Classification (SIC) code for the respondents affected by the standard, which correspond to the North American Industry Classification System (NAICS) code, is listed below for this source category.

Standard (40 CFR, part 63 subpart FFFFF)	SIC Codes	NAICS Codes
Integrated Iron and Steel Mills, Steel Companies, Sinter Plants, Blast Furnaces, Basic Oxygen Process Furnace Shops	3312	331111

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Integrated Iron and Steel Manufacturing (40 CFR Part 63, Subpart FFFFF).

A source must make the following reports:

Notifications	
Applicability	63.5(b), 63.7840(a)
Commencement of construction or reconstruction	63.9(b)(4), 63.7840(a)
Actual startup	63.9(b)(4), 63.7840(a)
Intention to construct/reconstruct	63.9(b)(4)-(5), 63.7840(a)
Compliance dates/extension	63.9(c), 63.7840(a)
Performance test/opacity observations	63.9(e), 63.7840(a)
Compliance status	63.9(g), 63.7840(a)

Reports	
Application for approval of the construction or reconstruction of a new major affected source, or reconstruction of a major affected source	63.5(d)(6)

Reports	
Performance test results	63.10(d)(2), 63.5755
Operation and maintenance plan	63.7800(b)
Immediate startup, shutdown, and malfunction report	63.6(e)(3), 63.7841(c)
Periodic startup, shutdown and malfunction reports	63.10(d)(5)(i), 63.7841(c)
Progress reports for compliance extension (if applicable)	63.6(i)
Semiannual report of compliance	63.7841(a)

A source must keep the following records:

Recordkeeping	
Notifications and reports	63.10(b)(2)(xiv), 63.7842(a)(1)
Startup, shutdown, and malfunction plan/events	63.6(e)(3)(iii)-(v), 63.7842(a)(2)
Performance test and opacity observations	63.10(b)(2)(viii), 63.7842(a)(3)
Continuous monitoring systems	63.10(b)(2)(vi)-(xi), 63.8(d)(3), 63.6(h)(7)(i)-(ii), 63.10(b)(2)(i)-(ii)
Visual observations	63.6(h)(6), 63.7842(c)
Records required to demonstrate continuous compliance	63.10(b)(2)(vii), 63.7842(d)

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 approximately10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
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, 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 could inspect the source to determine whether the pollution control devices are properly installed and operated. 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. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into OTIS, which is operated and maintained by the EPA Office of Compliance. OTIS is EPA's 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 and its 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

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost − NESHAP for Integrated Iron and Steel Manufacturing (40 CFR Part 63, Subpart FFFFF) (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 18,421 (Total Labor Hours from Table 1 below). 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	$121.42	($57.82 + 110%)
Technical	$99.14	($47.21 + 110%)
Clerical	$49.81	($23.72 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2011, "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 type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

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

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

(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital / Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Leak detectors	$9,000	0	$0	$2,389	18	$43,002
Continuous Opacity Monitors	$37,000	0	$0	$8,000	3	$24,000
					Total	$67,002

The total capital/startup costs for this ICR are zero. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $67,002. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be $67,002. These are recordkeeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall 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 $22,595.

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

Managerial	$62.27	(GS-13, Step 5, $38.92 x 1.6)
Technical	$46.21	(GS-12, Step 1, $28.88 x 1.6)
Clerical	$25.01	(GS-6, Step 3, $15.63 x 1.6)

These rates are from the Office of Personnel Management (OPM) "2011 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: Average Annual EPA Burden and Cost − NESHAP for Integrated Iron and Steel Manufacturing (40 CFR Part 63, Subpart FFFFF) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 18 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 18 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents [1]	(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	18	0	0	18
2	0	18	0	0	18
3	0	18	0	0	18
Average	0	18	0	0	18

[1] New respondent include sources with constructed, reconstructed and modified 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 18.

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

Total Annual Responses				
(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=(BxC)+D
Notification of compliance status	0	1	0	0
Notification/application of construction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test and test plans	0	1	0	0
Report of performance test results	18	0.4	0	7.2
Report of semiannual compliance reports	18	2	0	36
Report of startup, shutdown, malfunction	1	1	0	1
			Total	44.2

The number of Total Annual Responses is 44 (rounded).

The total annual labor costs are $1,765,120. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost − NESHAP for Integrated Iron and Steel Manufacturing (40 CFR Part 63, Subpart FFFFF) (Renewal).

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 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 18,421 hours at a cost of $1,765,120. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost − NESHAP for Integrated Iron and Steel Manufacturing (40 CFR Part 63, Subpart FFFFF) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 419 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $67,002. 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 501 labor hours at a cost of $22,595. See below Table 2: Average Annual EPA Burden and Cost − NESHAP for Integrated Iron and Steel Manufacturing (40 CFR Part 63, Subpart FFFFF) (Renewal).

6(f) Reasons for Change in Burden

There is no change in the labor hours 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 for the industry is very low, negative or non-existent, so there is no significant change in the overall burden. However, there is an increase in the total labor and Agency costs as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The change in cost estimates reflects updated labors rates available from the Bureau of Labor Statistics.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 419 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, 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's 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-2011-0271. 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 content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search" than 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 Avenue, N.W., 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 Enforcement and Compliance Docket and Information Center Docket 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, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2011-0271 and OMB Control Number 2060-0517 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 Integrated Iron and Steel Manufacturing (40 CFR Part 63, Subpart FFFFF) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year [b]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read instructions	2	1	2	0	0	0	0	$0
B. Required activities [c, d]								
i. Method 5 performance test [e]	40	7.6	304	18	5,472	273.6	547.2	$602,977.74
ii. Method 9 performance test [e]	8	3.6	28.8	18	518.4	25.9	51.8	$57,124.21
iii. Method 6071B performance test	2	365	730	7	5,110	255.5	511	$563,087.76
iv. Startup, shutdown, malfunction plan	40	1	40	0	0	0	0	$0
v. Inspection and maintenance of capture systems and control devices	2	12	24	18	432	21.6	43.2	$47,603.51
C. Gather existing information	See 5D, 5E							
D. Write report [c, d]								
i. Notification of applicability	2	1	2	0	0	0	0	$0
ii. Notification of compliance status	2	1	2	0	0	0	0	$0
iii. Notification of intent to construct a major source and review application	4	1	4	0	0	0	0	$0
iv. Notification of initial construction/ reconstruction	4	1	4	0	0	0	0	$0
v. Notification of actual startup	4	1	4	0	0	0	0	$0
vi. Notification of performance test	4	1	4	0	0	0	0	$0
vii. Reports of performance test results	See 4B, 5E							
viii. Semiannual compliance reports [c]	40	2	80	18	1,440	72	144	$158,678.35
ix. Startup, shutdown, malfunction report [f]	4	1	4	1	4	0.2	0.4	$440.77
Subtotal for Reporting Requirements					**14,922.8**			
4. Recordkeeping Requirements								
A. Read instructions	See 4A							
B. Plan activities	10	1	10	0	0	0	0	$0

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year [b]
C. Implement activities	See 4B							
D. Develop record system	N/A							
E. Time to enter and transmit information [g]	3.25	52	169	18	3,042	152.1	304.2	$335,208.02
F. Time to train personnel	3	1	3	0	0	0	0	$0
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					**3,498.3**			
TOTAL LABOR BURDEN AND COST (rounded)					**18,421**			**$1,765,120**

Assumptions:

[a] We have assumed that there are approximately 18 existing sources currently subject to this rule. There will be no additional new source that will become subject to the rule each year over the three-year period of this ICR.

[b] This ICR uses the following labor rates: $121.42 per hour for Executive, Administrative, and Managerial labor; $99.14 per hour for Technical labor, and $49.81 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2011 "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.

[c] We have assumed that existing sources have already compiled with initial rule requirements and are in full compliance with periodic requirements including semiannual reports. New respondents would have to comply with the initial rule requirements including notifications and performance tests for add-on control devices.

[d] Monitoring and recordkeeping of operations for respondents will include monthly inspection of capture and control systems; daily testing of oil content for the sinter plant feed (7 plants [from the composite of three samples taken at 8-hour intervals]) to compute the 30-day rolling average oil content for each operating day; and every 2.5 years, each emission point must be sample by Method 5 for particulate matter and Method 9 for opacity observations to determine the opacity of fugitive emissions.

[e] Based on the average for the 18 respondents, we have assumed that there is an average of 7.6 emission points per respondent that need to be sampled using Method 5 and 3.6 emission points per respondent to need to be sampled using Method 9.

[f] We have assumed that one respondent per year will have at least one startup, shutdown, or malfunction (SSM) that is not managed according to the SSM plan.

[g] We have assumed that it takes each respondent approximately 3.25 hours per week to record and transmit information.

Table 2: Average Annual EPA Burden and Cost − NESHAP for Integrated Iron and Steel Manufacturing (40 CFR Part 63, Subpart FFFFF) (Renewal)

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 [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
New Respondents [c]								
i. Notification of compliance status	4	1	4	0	0	0	0	$0
ii. Notification of intent to construct a major source and review application	4	1	4	0	0	0	0	$0
iii. Notification of start of construction	2	1	2	0	0	0	0	$0
iv. Notification of actual startup	2	1	2	0	0	0	0	$0
v. Notification of initial performance test and test plan	4	1	4	0	0	0	0	$0
Existing Respondents								
i. Performance test report for Method 5 and Method 9 [d]	20	0.4	8	18	144	7.2	14.4	$7,462.43
ii. Review semiannual compliance reports [e]	8	2	16	18	288	14.4	28.8	$14,924.85
iii. Review of startup, shutdown, malfunction reports [e]	4	1	4	1	4	0.2	0.4	$207.29
Subtotals Labor Burden and cost					436	21.8	43.6	$22,594.57
TOTAL ANNUAL BURDEN AND COST (rounded)					501			$22,595

Assumptions:

[a] We have assumed that there are approximately 18 existing sources currently subject to this rule. There will be no additional new source that will become subject to the rule each year over the three-year period of this ICR.

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: $62.27 for Managerial (GS-13, Step 5, $38.92 x 1.6), $46.21 for Technical (GS-12, Step 1, $28.88 x 1.6), and $25.01 Clerical (GS-6, Step 3, $15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) "2011 General Schedule" which excludes locality rates of pay.

[c] We have assumed that existing sources have to comply with the initial rule requirements. New respondents are required to conduct performance test for add-on control equipments, submit initial notifications and prepare startup, shutdown and malfunction (SSM) plans.

[d] Every 2.5 years (or about 0.4 times per year, if average over the three year period of ICR), respondents must sample each emission point using Method 5 for particulate matter and Method 9 for opacity observations, and submit a report with results.

[e] Sources are required to submit semiannual compliance reports and startup, shutdown, and malfunction (SSM) reports if there is an occurrence that is not managed according to the SSM plan.