

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels  
(40 CFR Part 60, Subparts AA and AAa) (Renewal)**

**1. Identification of the Information Collection**

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

NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal), EPA ICR Number 1060.16, OMB Control Number 2060-0038.

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

The New Source Performance Standards (NSPS) for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels were proposed on October 21, 1974, promulgated on September 23, 1975, and most recently amended on February 22, 2005. These regulations apply to both new and existing facilities in steel plants that produce carbon, alloy, or specialty steels: electric arc furnaces (EAFs), argon oxygen decarburization (AOD) vessels, and dust handling systems.

NSPS subpart AAa was proposed on August 17, 1983, and promulgated on October 31, 1984. It established new standards applicable to EAFs, AOD vessels, and dust handling systems constructed, modified, or reconstructed after August 17, 1983. On March 2, 1999, the Agency approved daily shop opacity observations as an alternative to static pressure monitoring at an EAF with a direct shell evacuation system, and clarified some definitions. On February 22, 2005, the Agency approved the use of bag leak detection systems couple with daily shop opacity observations as an alternative to continuous opacity monitoring. New facilities include those that commenced construction, modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 60, subparts AA and AAa.

In general, all NSPS 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 NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two 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 facilities at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 98.4 respondents per year will be subject to the standard, and one additional respondent over the next three years will become subject to the standard.

OMB approved the currently active ICR without any “Terms of Clearance.”

The “Affected Public” are facilities that produce carbon, alloy, or specialty steels (or minimills). The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal).

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

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

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

... application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data

when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, particulate matter emissions from electric arc furnaces, argon-oxygen decarburization (AOD) vessels, and dust handling systems cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS was promulgated for this source category at 40 CFR part 60, subparts AA and AAa.

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

The recordkeeping and reporting requirements in the standard ensures 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 test 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, leaks are being detected and repaired, and the standard is 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 60, subparts AA and AAa.

### **3(a) Non-duplication**

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

### **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 (77 FR 63813) on October 17, 2012. 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 record-keeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's 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 and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) ASTM International, at (800) 262-1373; and 2) the Specialty Steel Industry of North America, at (202) 342-8630.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

### **3(d) Effects of Less Frequent Collection**

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

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

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

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 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 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 facilities in steel plants that produce carbon, alloy, or specialty steels. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3312: Steel Works, Blast Furnaces (Including Coke Ovens), and Rolling Mills (except coke ovens not integrated with steel mills), which corresponds to the North American Industry Classification System (NAICS) code 331111 for Iron and Steel Mills.

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

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

In this ICR, all the data that is recorded or reported is required by the NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa).

A source must make the following reports:

<b>Notifications</b>	
Notification of date of construction/reconstruction	60.7(a)(1)
Notification of demonstration of compliance with the particulate matter standard	60.276(c)

<b>Notifications</b>	
Notification of actual startup	60.7(a)(3)
Notification of initial performance test	60.8(d)
Report of performance test results	60.8 (a)
Notification of demonstration of the continuous monitoring system performance commences	60.7(a)(5)
Notification of procedures to be followed during performance tests if emissions is combined with non-affected facilities	60.276(b)(2)
Physical or operational change	60.7(a)(4)
Use of opacity or visible emissions observations during performance test	60.7(a)(6-7)
Provide semiannual reports of operational values that exceed (i.e., furnace static pressure, fan motor amperes) or are below (i.e., flow rates) those established during the performance test, and of all shop opacity observations in excess of the emission limit	60.7(c), 60.276(a), 60.276(d), 60.276 a(c), 60.276a (g)

A source must keep the following records:

<b>Recordkeeping</b>	
Startups, shutdowns, and malfunctions, periods where the continuous monitoring system is inoperative.	60.7(b)
Furnace static pressure measurements or daily observations of shop opacity by a certified visible emission observer if EAF is equipped with a direct shell evacuation system (DEC).	60.273(d), 60.274(f), 60.276(d), 60.274a (f)
Daily records of operational parameters, such as time and duration of each charge, time and duration of each tap, flow rate data, pressure data.	60.274(a-b), 60.274a (b)
Note deficiencies during monthly control system fan motor amperes operational status check.	60.274(f), 60.274a (f)
Maintain a file of all measurements including, performance test measurements, and all other information required by this part recorded in a permanent file suitable for inspection. The file shall be retained for at least two years.	60.7(f), 60.276a (a)
Record of time and duration of each charge and tap (NSPS subpart AA only).	60.274(a)

### Electronic Reporting

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

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

#### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for measurement of daily monitoring of the opacity of visible emissions.
Perform initial performance test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently sources are using monitoring and reporting equipment that provide 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.

<b>Agency Activities</b>
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 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. 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 EPA's 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 the 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/operator for two years.

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

A majority of the respondents are small entities (i.e., small businesses). The recordkeeping and reporting requirements are the same for both small and large entities (minimills) since the process operations and the types of control equipment employed by them are similar, independently of their size. However, EPA reduced the reporting frequency



for this information from quarterly to semiannually in a December 1990 Federal Register notice to reduce the impact of reporting burden on small businesses. The reduction in reporting frequency was in response to OMB's previous questions regarding the need for quarterly versus semiannual reporting. 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.

In EPA's 1979 Review of Standards of Performance for Electric Arc Furnaces in the Steel Industry, it was noted that approximately 84 percent of the facilities subject to the standards were small entities<sup>1</sup>. It is assumed that 84 percent of the current respondents subject to standards (or 83 of the 98 respondents) are small entities.

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

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (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 61,310 (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 NSPS program, the previously approved ICR, and any comments received.

#### **6(b) Estimating Respondent Costs**

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<sup>1</sup> *Review of Standards of Performance for Electric Arc Furnaces in Steel Industry*. EPA-450 3-79-033. October, 1979.

**(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$121.44 (\$57.83 + 110%)
Technical	\$100.23 (\$47.73 + 110%)
Clerical	\$50.51 (\$24.05 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2012, “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 monitors and other costs such as photocopying and postage.

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

This ICR assumes that: 40 percent of respondents using negative baghouses (39.5), 66 percent (26.1) of these use COMS to measure stack emissions and 33 percent (13.0) have elected to use the alternative option of using BLDS monitoring couple with visible emissions observations instead of using COMS; 51.7 percent (51.0) of respondents have elected to comply with the fugitive emissions monitoring requirements by measuring the furnace static pressure continuously; all respondents (98.7) are required to installed flow rate monitors as part of the monitoring of operations rule requirements; and that the operating and maintenance costs associated with the pressure and flow monitors are negligible.

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(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)
Continuous Opacity Monitors	\$25,000	0	\$0	\$7,500	26.1	\$195,750
Furnace Static Pressure Monitors	\$300	0.3	\$90	\$0	51.0	\$0
Volumetric Flow Rate Monitor	\$18,000	0.3	\$5,400	\$0	98.7	\$0
<b>TOTAL</b>			\$5,490			\$195,750

The total capital/startup costs for this ICR are \$5,490. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$195,750. 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 \$201,240. These are the 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 \$82,502.

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

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

These rates are from the Office of Personnel Management (OPM), 2012 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 – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal).

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

Based on our research for this ICR, approximately 98.4 existing respondents will be subject to the standards initially, and it is estimated that an additional 0.3 respondents per year will become subject during the three-year period. The overall average number of respondents, as shown in the table below, is approximately 98.7 per year.

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

<b>Number of Respondents</b>					
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also new Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0.3	98.1	0	0	98.4
2	0.3	98.4	0	0	98.7
3	0.3	98.7	0	0	99.0
Average	0.3	98.4	0	0	98.7

<sup>1</sup> New respondent include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 98.7.

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

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of actual startup	0.3	1	0	0.3
Notification of construction/ modification	0.3	1	0	0.3
Notification of performance test	0.3	1	0	0.3
Reports of performance test results	0.3	1.2	0	0.36
Semiannual reports	98.7	2	0	197.4
			Total	198.66

The number of Total Annual Responses is 199 (rounded).

The total annual labor costs are \$5,936,587. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal).

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

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

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

The total annual labor hours are 61,310 hours at a cost of \$5,936,587. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 308 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$201,240. 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 1,831 labor hours at a cost of \$82,502. See Table 2 below: Average Annual EPA Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal).

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

There is an increase in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The increases in burden, including labor hours, labor costs, and O&M costs reflect an increase in the number of respondents. The new number of respondents accounts for the one new source that is subject to the rule since the last ICR period. Further, this ICR uses updated labor rates to calculate burden costs, which results in an increase in labor costs for both the respondents and the Agency.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 308 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2012-0653. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public

Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2012-0653 and OMB Control Number 2060-0038 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 – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal)**

REPORTING/RECORDKEEPING REQUIREMENT	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (A x B)	(D) Number of Respondents per Year <sup>a</sup>	(E) Technical Hours per Year (C x D)	(F) Management Hours per Year (E x 0.05)	(G) Clerical Hours per Year (Ex0.1)	(H) Total Labor Costs per Year, \$ <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read instructions	-----Included in 3B-----							
B. Required activities								
Initial Performance tests <sup>c</sup>	364	1	364	0.3	109.2	5.46	10.92	\$12,159.75
Repeat Performance tests <sup>c</sup>	364	0.2	72.8	0.3	21.84	1.09	2.18	\$2,431.95
Monitoring of operations and emissions <sup>d,e</sup>	-----Included in 4E-----							
D. Gather Existing Information	-----Included in 3B and 4E-----							
E. Write report								
Notification of construction/ modification	2	1	2	0.3	0.6	0.03	0.06	\$66.81
Notification of actual startup	2	1	2	0.3	0.6	0.03	0.06	\$66.81
Notification of initial performance test	2	1	2	0.3	0.6	0.03	0.06	\$66.81
Reports of performance test results	-----Included in 3B-----							
Semiannual reports <sup>f</sup>	16	2	32	98.7	3,158.4	157.92	315.84	\$351,697.32
<b>Subtotal for Reporting Requirements (rounded)</b>						<b>3,785</b>		<b>\$366,489</b>
4. Recording Requirements								
A. Read instructions	-----Included in 3A-----							
B. Plan activities	-----Included in 3B-----							
C. Implement activities	-----Included in 3B-----							
D. Develop record system	N/A							
E. Time to enter and transmit information:								
Records of daily monitoring of operations <sup>d</sup>	0.75	350	262.5	98.7	25,908.75	1,295.44	2,590.88	\$2,885,017.59



REPORTING/RECORDKEEPING REQUIREMENT	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (A x B)	(D) Number of Respondents per Year <sup>a</sup>	(E) Technical Hours per Year (C x D)	(F) Management Hours per Year (E x 0.05)	(G) Clerical Hours per Year (E x 0.1)	(H) Total Labor Costs per Year, \$ <sup>b</sup>
Records of daily emissions monitoring by a certified observer <sup>e, h</sup>	0.5	350	175	47.67	8,342.25	417.11	834.22	\$928,934.01
Records of COMS <sup>g, i</sup>	0.5	350	175	26.06	4,560.5	228.02	456.05	\$507,824.74
Records of BLDS <sup>h, i</sup>	0.5	350	175	13.03	2,280.25	114.01	228.02	\$253,912.12
Records of static furnace <sup>h</sup>	0.5	350	175	51.03	8,930.25	446.51	893.02	\$994,409.57
F. Time to train personnel	N/A							
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements (rounded)</b>						<b>57,525</b>		<b>\$5,570,098</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						<b>61,310</b>		<b>\$5,936,587</b>

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 98.4 sources currently subject to the NSPS, subparts AA and AAa. We have further assumed that one minimill will become subject to the standard over the three year period of this ICR (0.3 new respondents per year). Therefore, the average number of respondents per year is estimated to be 98.7 (rounded).

<sup>b</sup> This ICR uses the following labor rates: Technical \$100.23 (\$47.73 + 110%); Managerial \$121.44 (\$57.83+ 110%); and Clerical \$50.51 (\$24.05 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2012, "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. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

<sup>c</sup> We have assumed that existing sources are in compliance with initial rule requirements including the initial performance test and notification requirements. We have assumed that 20 percent of the sources would repeat performance tests due to failure.

<sup>d</sup> Daily monitoring of operations includes time and duration of each charge, time and duration of each tap, flow rate data and pressure data. In addition, sources are required to conduct monthly operational status checks of the equipment (e.g., physical appearance, pressure sensors, dampers, damper switches).

<sup>e</sup> Daily emissions monitoring includes stack emissions monitoring using a continuous opacity monitor if the source has an EAF equipped with a direct shell evacuation system (DEC) and uses a negative pressure baghouse, and has not elected the alternative option. In addition, the source is required to conduct fugitive emissions monitoring using a furnace static pressure monitoring device or by electing to perform shop opacity observations using a certified visible emissions observer, if the source has an EAF equipped with a DEC.

<sup>f</sup> Sources are required to provide semiannual reports of opacity observations and operational values (i.e., furnace static pressure, fan motor amperes) that

exceed or are below (i.e, flow rates) those established during the performance test, and of all shop opacity observations in excess of the emission limit.

<sup>8</sup> We have assumed that the new source will equipped its EAFs with a DEC system and use a positive pressure baghouse, and therefore, will not be required to install a continuous opacity monitor (COMS).

<sup>h</sup> We have assumed that approximately 51.7 percent of the respondents (or 51.03 respondents) will choose to comply with the fugitive emissions monitoring requirements by measuring the furnace static pressure continuously and 48.3 percent (47.67 respondents) will choose the alternative option of daily opacity shop observations by a certified visible emission observer couple with the use of bag leak detection systems (BLDS). We have assumed that approximately 51.7 percent of the respondents (or 51.03 respondents) will choose to comply with the fugitive emissions monitoring requirements by measuring the furnace static pressure continuously and 48.3 percent (47.67 respondents) will choose the alternative option of daily opacity shop observations by a certified visible emission observer couple with the use of bag leak detection systems (BLDS).

<sup>i</sup> We have assumed that approximately 40 percent of respondents use negative pressure baghouses. Of these, 66 percent (26.06) use COMS to measure stack emissions and 33 percent (13.03) have elected to use the alternative option of using BLDS monitoring couple with visible emissions observations instead of using COMS.

**Table 2: Average Annual EPA Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal)**

REPORTING/RECORDKEEPING REQUIREMENT	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Plant Per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year <sup>a</sup>	(E) Techn ical Hours per Year (CxD)	(F) Manag ement Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.1)	(H) Costs per Year, \$ <sup>b</sup>
Notification of construction/modification	2	1	2	0.3	0.6	0.03	0.06	\$31.10
Notification of actual startup	1	1	1	0.3	0.3	0.015	0.03	\$15.61
Notification of performance test <sup>c</sup>	0.5	1.2	0.6	0.3	0.18	0.009	0.018	\$9.33
Initial performance test	24	1	24	0.3	7.2	0.36	0.72	\$373.14
Repeat Performance test <sup>c</sup>	24	0.2	4.8	0.3	1.44	0.072	0.144	\$74.62
Review Performance Test results <sup>c</sup>	8	1.2	9.6	0.3	2.88	0.144	0.29	\$149.30
Notification of COMS Demonstration	0.5	1	0.5	0.3	0.15	0.007	0.015	\$7.73
Semiannual reports	8	2	16	98.7	1,579.2	78.96	157.92	\$81,841.25
<b>TOTAL ANNUAL BURDEN and COST (rounded)</b>					<b>1,831</b>			<b>\$82,502</b>

Assumptions

<sup>a</sup> We have assumed that there are approximately 98.4 sources currently subject to the NSPS, Subparts AA and AAa. We have further assumed that one minimill will become subject to the standard over the three year period of this ICR (0.3 new respondents per year). Therefore, the average number of respondents per year is estimated to be 98.7 (rounded).

<sup>b</sup> This cost is based on the average hourly labor rate as follows: Technical \$46.21 (GS-12, Step 1, \$28.88 + 60%); Managerial \$62.27 (GS-13, Step 5, \$38.92 + 60%); and Clerical \$25.01 (GS-6, Step 3, \$15.63 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the OPM, 2012 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.

<sup>c</sup> We have assumed that 20 percent of the sources would repeat performance tests due to failure.