

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal), EPA ICR Number 2277.04, OMB Control Number 2060-0608.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the regulations published at 40 CFR Part 63, Subpart YYYYYY were proposed on September 20, 2007, and promulgated on December 28, 2007. These regulations apply to existing and new Electric Arc Furnace (EAF) steelmaking facilities that are area sources of hazardous air pollutants (HAP) emissions. The standard establishes particulate matter (PM) emission limits for control devices and opacity limits for melt shops, pollution prevention requirements for ferrous scrap that is melted in EAFs, and monitoring, reporting, and recordkeeping requirements. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart YYYYYY.

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 United States Environmental Protection Agency (EPA) regional office.

Based on our consultations with industry representatives, there is an average of one affected facility 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 87 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard. The estimate was obtained by consulting industry during the renewal of this current ICR.

The Office of Management and Budget (OMB) approved the currently active ICR

without any “Terms of Clearance.”

There are approximately 87 EAF steelmaking facilities in the United States, which are all owned and operated by the iron and steel mill industry. None of the facilities are owned by state, local, tribal or the Federal government. They are all owned and operated by privately owned, for-profit businesses. The burden to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal). The “Federal Government” burden is attributed entirely to work performed by federal employees or government contractors and may be found in Table 2: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from EAF steelmaking facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart YYYYYY.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The

collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance 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 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. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart YYYYYY.

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 its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (78 FR 35023) on June 11, 2013. 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 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 both the Steel Manufacturers Association (SMA) at (202) 296-1515 and the American Iron and Steel Institute at (202) 452-7180. The SMA estimated the number of EAF facilities has decreased from 91 to 87 since the last ICR renewal period, due to changes in industry (including facility closure as well as startup). We have revised the number of respondents based on the comment received.

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.

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 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

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 EAF steelmaking facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3312, 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 NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY).

A source must make the following reports:

Notifications/Reports	
Scrap management and pollution prevention plan	63.10685(a)(1) and (b)(1)
Startup, shutdown, and malfunction plan	63.6(e)(3)
Notification of applicability	63.9(b)(1)
Notification and application of construction or reconstruction	63.9(b)(4)
Compliance extension	63.9(c)
Notification of special requirements	63.9(d)
Notification of performance test	63.9(e)
Notification of opacity and visible emission observations	63.9(f)
Additional COMS notifications	63.9(g)
Notification of compliance status	63.10690(b) and 63.9(h)
Semiannual compliance report addressing: 1) the number of mercury switches removed or the weight of mercury recovered from the switches	63.10685(c)

Notifications/Reports	
and properly managed, the estimated number of vehicles processed, an estimate of the percent of mercury switches recovered, and a certification that the recovered mercury switches were recycled at RCRA-permitted facilities; and 2) the control of contaminants from scrap according to the requirements in §63.10(e)	
Startup, shutdown, malfunction report	63.10(d)(5)(ii)

A source must keep the following records:

Recordkeeping	
Notifications and reports	63.10685(c), 63.10(b)(2)(xiv)
Startups, shutdowns, malfunctions	63.6(e)(1)(iii)-(v)
Performance tests, performance evaluations, and opacity observations	63.10686, 63.10(b)(2)(viii)-(ix)
Emission/operating limits	63.10(b)(2)(vii)
Scrap management requirements	63.10685(c) and 63.10(b)(2)(iii)
Continuous monitoring systems	63.10(b)(2)(vi)-(vii), (x)-(xi) 63.10(c); 63.6(h)(7); 63.8(d)(3)

Electronic Reporting

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

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

(ii) Respondent Activities

Respondent Activities

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

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.

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.

Agency Activities

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 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 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 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 1,000 employees. Of all facilities that will be subject to the rule, only a few facilities are considered to be small entities.

Although the standard would not have a significant economic impact on the small entities, we tried to reduce the impact of the rule on small facilities. EPA met with industry trade associations and company representatives to address any small business concerns during development of the final rule.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 1,417 (Total Labor Hours from Table 1). 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	\$127.43 (\$60.68+ 110%)
Technical	\$99.16 (\$47.22 + 110%)
Clerical	\$50.88 (\$24.23 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2013, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are no capital/startup or operation and maintenance costs.

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

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

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. 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 \$7,515.

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), 2013 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 Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 87 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 87 per year.

The number of respondents is calculated using the following table that 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	87	0	0	87
2	0	87	0	0	87

Number of Respondents					
3	0	87	0	0	87
Average	0	87	0	0	87

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 87.

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
Prepare scrap plan and scrap specifications	0	0	N/A	0
Initial performance tests	0	0	N/A	0
Notification of compliance status	0	0	N/A	0
Request for compliance extension	0	0	N/A	0
Notification of performance test	0	0	N/A	0
SSM report	29	1	N/A	29
Semiannual excess emissions reports	87	2	N/A	174
TOTAL (rounded)				203

The number of Total Annual Responses is 203.

The total annual labor costs are \$136,341. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (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 1,417. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 7 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. 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 167 labor hours at a cost of \$7,515. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal).

6(f) Reasons for Change in Burden

There is a decrease in the respondent burden and an increase in Agency burden. These changes occurred due to the following adjustment: 1) This ICR revises the number of respondents from 91 to 87 based on input provided from industry trade association; and 2) This ICR corrects the frequency of semiannual report review from one to two in Table 2. This correction results in an increase in the estimated Agency burden.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 7 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-2013-0323. 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) 566-1927. 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-2013-0323 and OMB Control Number 2060-0608 in any correspondence.

Part B of the Supporting Statement

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

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (A x B)	(D) Respondent s per year ^a	(E) Technic al person- hours per year (C x D)	(F) Managemen t person hours per year (E x0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost per year ^b
A. Read instructions	See 4A							
B. Plan activities	See 4A							
C. Implement activities	See 4A							
D. Develop record system ^d	4	1	4	0	0	0	0	\$0
E. Time to enter information	0.5	52	26	29	754	37.7	75.4	\$83,408.76
F. Time to transmit or disclose information	0.25	2	0.5	29	14.5	0.73	1.45	\$1,604.01
G. Time to adjust existing ways ^d	2	1	2	0	0	0	0	\$0
F. Time to train personnel ^d	4	1	4	0	0	0	0	\$0
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					883.8			\$85,012.78
TOTAL ANNUAL BURDEN AND COST (ROUNDED)					1,417			\$136,341.25

N/A = Not Applicable.

Assumptions:

^a There are 87 EAF steelmaking facilities. The average number of respondents per year for one-time events over the 3-year period of the ICR is 29.

^b This ICR uses the following labor rates: \$127.43 for managerial labor, \$99.16 for technical labor, and \$50.88 for clerical labor. These rates are from the U.S. Department of Labor, Bureau of Labor Statistics, December 2013. The rates have been increased by 60 percent to account for overhead.

^c All plants have conducted performance tests during the implementation period of the rule.

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

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

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (AxB)	(D) Plants per year ^a	(E) Technical person-hours per year (CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, \$ ^b
Report Review								
Initial notification of applicability ^c	1	1	1	0	0	0	0	\$0
Startup, shutdown, malfunction plan/report	2	1	2	29	58	2.9	5.8	\$3,005.82
Notification of compliance status ^c	1	1	1	0	0	0	0	\$0
Semiannual excess emissions report	0.5	2	0.5	87	87	4.35	8.7	\$4,508.73
TOTAL ANNUAL BURDEN						167		\$7,515

Assumptions:

^a There are 87 EAF steelmaking facilities. The average number of respondents per year for one-time events over the 3-year period of the ICR is 29.

^b This ICR uses the following average hourly labor rates: \$62.27 for managerial (GS-13, Step 5, \$38.92 × 1.6), \$46.21 (GS-12, Step 1, \$28.88 × 1.6) for technical and \$25.01 (GS-6, Step 3, \$15.63 × 1.6) for clerical. These rates are from the Office of Personnel Management (OPM) “2013 General Schedule” which excludes locality rates of pay.

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