SUPPORTING STATEMENT ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (40 CFR Part 63, Subpart XXX) (Supplemental Proposed Rule)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (40 CFR Part 63, Subpart XXX), EPA ICR Number 2448.02, OMB Control Number 2060-NEW.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the regulations published at 40 CFR subpart XXX were proposed on August 4, 1998, promulgated on May 20, 1999, and amended most recently on March 22, 2001. The purpose of this information collection request is to document the expected impacts of proposed addition of proposed changes to subpart XXX that are being developed as part of the risk and technology review process of the current subpart XXX. Subpart XXX would continue to apply to new and existing ferroalloys production facilities that manufacture ferromanganese and silicomanganese, and that are either major sources of hazardous air pollutants (HAPs) emissions or are co-located at major sources of HAPs. The following affected facilities at ferroalloy production plants are subject to this NESHAP rule: submerged arc furnaces; casting operations, metal oxygen refining (MOR) process; crushing and screening operations; and fugitive dust sources. New sources include those that commenced construction or reconstruction after the date of the supplemental proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart XXX.

Compared to existing subpart XXX, the proposed changes would increase the number of pollutants and sources regulated and add requirements for continuous monitoring and periodic testing. In addition, the proposed rule would eliminate the startup, shutdown and malfunction (SSM) exemption, remove the SSM plan requirement and add a requirement for electronic submittal of performance tests.

In general, all NESHAP standards require initial notifications, performance tests, monitoring and periodic reports by the owners/operators of the affected facilities. 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 5 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.

Over the next 3 years, an average of two respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard. Based on our consultations with industry representatives, there are two plants that are currently subject to subpart XXX and both would be subject to the proposed revisions to XXX. The facilities subject to this rule have the ability to comply with the reporting requirements electronically.

The burden to respondents is calculated in Tables 1, 2, and 3 of Attachment 1: Annual Respondent Burden and Cost of Reporting and Recordkeeping for Ferroalloys Production: Ferromanganese and Silicomanganese. Since this regulation only affects the ferroalloys production industry, the burden to the "Federal Government" is attributed entirely to work performed by Federal employees or government contractors. This burden is calculated in Tables 5, 6, and 7 of Attachment 1: Annual Burden and Cost to the Federal Government for Ferroalloys Production: Ferromanganese and Silicomanganese.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

Section 112 of the Clean Air Act (CAA) requires the EPA to establish NESHAP for both major and area sources of HAP that are listed for regulation under CAA section 112(c). A major source is a stationary source that emits or has the potential to emit more than 10 tons per year (tpy) of any single HAP or more than 25 tpy of any combination of HAP. An area source is a stationary source that is not a major source (i.e., an area source does not emit and does not have the potential to emit more than 10 tpy of any single HAP and more than 25 tpy of any combination of HAP). For major sources, these technology-based standards must reflect the maximum degree of emission reductions of HAP achievable (after considering cost, energy requirements, and non-air quality health and environmental impacts) and are commonly referred to as maximum achievable control technology (MACT) standards. Section 112(d)(6) requires the EPA to review these technology-based standards and to revise them "as necessary (taking into account developments in practices, processes, and control technologies)" no less frequently than every 8 years. In addition, section 112(f) of the CAA requires the EPA to determine for source categories subject to certain CAA section 112(d) standards whether the emissions limitations provide an ample margin of safety to protect public health. For MACT standards for HAP "classified as a known, probable, or possible human carcinogen" that "do not reduce lifetime excess cancer risks to the individual most exposed to emissions from a source in the category or subcategory to less than 1-in-1 million," the EPA must promulgate residual risk standards for the source category (or subcategory) as necessary to provide an ample margin of safety to protect

public health. In doing so, the EPA may adopt standards equal to existing MACT standards, if the EPA determines that the existing standards are sufficiently protective. The EPA must also adopt more stringent standards, if necessary, to prevent an adverse environmental effect, but must consider cost, energy, safety, and other relevant factors in doing so.

Certain records and reports are necessary for the Administrator to confirm the compliance status of sources subject to NESHAP, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the Clean Air Act (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions. The recordkeeping and reporting requirements for title V permits are contained in 40 CFR 70.6 and 40 CFR 71.6. Under parts 63 and 70 or 71, the owner or operator must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standards ensure compliance with the applicable regulations which where 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 for air pollution devices are required in order to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure that the control equipment is operating properly and therefore, ensure compliance with the standards 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 standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to ensure that the pollution control devices are properly installed and operated; that leaks are being detected and repaired; and that the standards are being met. The performance test may also be observed.

The required semiannual compliance status reports and quarterly excess emissions 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

A computer search of the EPA's ongoing ICRs revealed no duplication of information-gathering efforts.

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, no duplication exists.

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

The preamble to the proposed rule will provide public notice.

3(c) Consultations

The proposed rule amendments were developed using extensive consultation with individual companies and state agencies. Several of the key non-EPA persons consulted on the information collection activities are identified in Table 1. Additional meetings and contacts are documented in the project docket for this proposed rule, Docket No. EPA-HQ-OAR-2009-0734.

TABLE 1. PERSONS CONSULTED ON THE INFORMATION COLLECTION ACTIVITIES

Contact	Organization	Telephone Number
Jeffrey McKinney	Eramet Marietta, Inc.	740-374-1143
John Konrady	Felman Production	304-882-1181
James Robertson	West Virginia Department of Environmental	304-926-0499
	Protection	
Christina Wieg	Ohio EPA	740-380-5223

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

None of the guidelines in 5 CFR 1320.6 are being exceeded.

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 <u>FR</u> 36902, September 1, 1976; amended by 43 <u>FR</u> 40000, September 8, 1978; 43 <u>FR</u> 42251, September 20, 1978; 44 <u>FR</u> 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

(a) Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements are the owners or operators of all new and existing ferroalloys production facilities that are major sources or are co-located at major sources. The affected facilities produce either ferromanganese or silicomanganese. The North American Industry Classification System (NAICS) code is 331112, "Electrometallurgical Ferroalloy Product Manufacturing."

There are two facilities that will be subject to the proposed amendments to the NESHAP. No new ferroalloys production facilities are expected during the 3-year period of this ICR.

4(b) Information Requested

i) Data Items

Attachment 2, Information Requirements, summarizes the data items, including recordkeeping and reporting requirements, for the Ferroalloys Production source category. The amendments to the NESHAP require that any performance tests performed after the effective date of the final rule be submitted electronically to EPA's Central Data Exchange by using the Electronic Reporting Tool (ERT) for test methods that are compatible with ERT. This new requirement to submit the data to the ERT is in addition to the other existing submission requirements for this data.

(ii) Respondent Activities

The respondent activities that will be required by the proposed amendments to the Ferroalloys Production NESHAP are identified in Tables 1 through 3 of Attachment 1 and are introduced in section 6(a).

This illustrative estimate is not considered a duplicate estimate of cost under the General Duty to Minimize Emissions clause under §63.6(e)(1)(i), which states: "At all times, the owner and operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determining whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source."

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

5(a) Agency Activities

The Agency activities associated with the proposed amendments to the Ferroalloys Production NESHAP are provided in Tables 5 through 7 of Attachment 1 and are introduced in section (6)(c).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and 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 quarterly excess emissions 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 the EPA Air Facility Subsystem (AFS) which is operated and maintained by the EPA Office of Compliance. AFS is the EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. The EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. The 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 5 years.

5(c) Small Entity Flexibility

For this source category, which has the NAICS code 331112 (i.e., Electrometallurgical ferroalloy product manufacturing), the Small Business Administration (SBA) small business size standard is 750 employees according to the SBA small business standards definitions. We have determined that there are no small businesses affected by this regulation at this time. The Agency considers the final rule requirements the minimum needed to ensure compliance with the standards.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Tables 1-3 of Attachment 1 for the Ferroalloys Production source category.

6. Estimating the Burden and Cost of the Collection

6(a) Estimating Respondent Burden

The annual burden estimates for the proposed amendments to the Ferroalloys Production NESHAP are shown in Tables 1 through 3 of Attachment 1. These numbers were derived from estimates based on the EPA's experience with other standards. No burden estimates are provided for new sources because no new facilities are expected to become affected sources during the 3-year period of this ICR.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

We used May 2012 mean hourly labor rates from the Bureau of Labor Statistics for the Iron and Steel Mills and Ferroalloy Manufacturing (NAICS 331100).¹ Loading factors (i.e., fringe benefits and overhead rates) were calculated using methodologies referenced in promulgated regulations and their accompanying Information Collection Requests (ICRs), particularly those used in New Source Review (NSR) regulations. Fringe benefits are calculated as 29% of hourly earnings, and overhead is calculated using a standard 110% above hourly earnings. Table 2 presents the labor rates used in the cost analysis.

¹ May 2012 National Industry-Specific Occupational Employment and Wage Estimates. Located http://www.bls.gov/oes/current/naics4_331100.htm#11-0000

	Hourly earnings [\$2012]	Fringe	Overhead	Loaded 2012 Hourly Earnings (\$)
Professional specialty and				
technical (environmental				
engineer)	34.26	1.29	2.10	\$92.81
Executive, admin, managerial				
(managers, all other)	55.21	1.29	2.10	\$149.56
Admin support (office clerk)	16.27	1.29	2.10	\$44.08

TABLE 2. 2012 LOADED LABOR RATES

To estimate the costs of conducting the initial performance tests, we assumed that facilities would hire a contractor. We show these cost as one-time expense in the 3-year ICR period.

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

The capital costs associated with the NESHAP include monitoring system initial costs; 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 conducting stack testing. We assumed that facilities would purchase and begin to operate all required monitoring systems in Year 2 of the ICR, which is also the year we assumed they would conduct their initial performance tests.

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

The estimated capital and O&M costs for the affected units for the first 3 years after promulgation are provided. For the two facilities, the total capital costs are \$360,548. The total annualized capital and O&M costs are \$1,798,436 for an average of \$599,479 per year.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The overall compliance and enforcement program of EPA 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 3 years of the ICR is estimated to be \$2,177.

The Agency labor rates are from the Office of Personnel Management (OPM) 2012 General Schedule, which excludes locality rates of pay. These rates can be obtained from Salary Table 2012-GS available on the OPM website, https://www.opm.gov/policy-data-oversight/payleave/salaries-wages/2012/general-schedule/. 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 were increased by 60 percent to include fringe benefits and overhead

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

There are two existing facilities that are subject to the proposed Ferroalloys Production NESHAP. No new sources are expected during the 3-year compliance period. No new facilities are expected to begin operation during the 3-year compliance period. Over the 3-year period, it is estimated that these two facilities will have 34 responses for an average of 11 per year.

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

(i) Respondent Tally

The bottom line respondent burden hours and costs, presented in Tables 1-3 of Attachment 1 are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column. The average annual burden for the recordkeeping and reporting requirements in the proposed amendments to subpart XXX for the two existing facilities that are subject to the Ferroalloys Production NESHAP is \$599,479. This includes 801 annual labor hours. The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1, 2, and 3 of Attachment 1, respectively.

(ii) The Agency Tally

The average annual Federal Government cost is \$2,177 for 48 hours for the proposed amendments to subpart XXX. The bottom line Agency burden hours and costs presented in Tables 5 through 7 of Attachment 1 are calculated by adding person-hours per year down each column for technical, managerial, and clerical staff, and by adding down the cost column.

6(f) Reasons for Change in Burden

We are requesting an increase in burden of \$543,523 over the full 3-year program due to implementation of these proposed changes to the regulation.

6(g) Burden Statement

The average annual respondent burden for the proposed amendments to the Ferroalloys Production NESHAP is estimated at 401 hours per facility or 36 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

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

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2010-0895. An electronic version of the public docket is available at http://www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. The docket is also available for in person viewing at the Air and Radiation 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 Air Docket is (202) 566-1742. Also, you may 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 relevant Docket ID Number (EPA-HQ-OAR-2010-0895) in any correspondence.

Part B of the Supporting Statement

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

ATTACHMENT 1

Burden Estimate Tables 1 through 8

Tables 1 through 3:	Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the Proposed Standard, Years 1 through 3
Table 4:	Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting of the Proposed Standard
Tables 5 through 7:	Annual Burden and Cost to the Federal Government of the Proposed Standard, Years 1 through 3
Table 8:	Summary of Annual Burden and Cost to the Federal Government of the Proposed Standard

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

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
	(~)	(D)	(0)	No. of	(Ľ)	(1)	(0)	(1)	()	(3)	(14)	(Ľ)
			Other non-		Person-hours							
	Person-hours	Contractor	labor costs	per	per		Technical	Management	Clerical	Total labor	Total non-	Total number
	per	cost per	per	respondent		Respondents				costs per	labor costs	
	occurrence	occurrence	occurrence	per year	per year	per year	per year	person-nours	per year	vear	per year	per year
	occurrence	Securicite	occurrence	μει γεα	(AxD)	peryear	(ExF)	(Gx0.05)	(Gx0.1)	yea	((B+C)xDxF)	
1. Applications	N/A				(* ***=)		()	(0)	(0.101_)		((= =)=)	()
2. Survey and Studies	N/A											
3. Reporting Requirements												
A. Read instructions (b)	20.00			1.0	20.0	2.0	40.0	0.4	4.0	\$3,949	\$0	0
B. Required activities												-
a. Initial Compliance test (PM, HCl, Hg, PAH, formaldehyde) - Furnace PP FF	15.00	\$200.000		3.0	45.0	0.0	0.0	0.0	0.0	\$0	\$0	0 0
b. Initial Compliance test (PM, HCl, Hg, PAH, formaldehyde) - Furnace NP FF/Scrbr	15.00	\$52,000		2.0			0.0					
c. Initial Compliance test (PM) Bldg Vent./#12 casting/misc. sources NP FF	20.00	\$5,000		4.0	80.0		0.0					
d. Weekly Method 9 (c)	2.00	\$0,000		156.0	312.0		0.0	0.0	0.0	\$0	\$0	
e. Pressure drop/liquid flow rate CPMS-scrubber	2.00				522.10	0.0	0.0	0.0	0.0	**	÷	
Initial Capital	2.00		\$50.000	1.0	2.0	0.0	0.0	0.0	0.0	\$0	\$0	0
Annual (O&M)	2.00		\$18,000	1.0			0.0	0.0			\$0	
f. Bag Leak Detection System	2.00		\$10,000	1.0	2.0	0.0	0.0	0.0	0.0	\$ 0		
Initial Capital	4.00		\$269,148	0.5	2.0	0.0	0.0	0.0	0.0	\$0	\$0	0
Annual (O&M)	4.00		\$219.078	0.5	2.0		0.0	0.0	0.0	\$0	\$0	
g. Ductwork flow rate monitoring	4.00		\$213,010	0.0	2.0	0.0	0.0	0.0	0.0	\$ 0		
Initial Capital	2.0		\$41,400	0.5	1.0	0.0	0.0	0.0	0.0	\$0	\$0	0
Annual (O&M)	2.0		\$4,140	0.5	1.0		0.0	0.0	0.0	\$0 \$0	\$0	
h. Furnace Capture System Inspection (Quarterly)	2.0		\$4,140	10.0	20.0		0.0	0.0	0.0	\$0	\$0	
i. Annual Compliance test - Furnace Scrbr (PM, Hg), Furnace FF (Hg)	20.00	\$5,000		10.0	20.0		0.0	0.0				
C. Create information	See 3B	\$5,000		1.0	20.0	0.0	0.0	0.0	0.0	م 0	\$0	
D. Gather existing information	See 3B										\$0	
E. Write report	366 3D										\$0	
a. Initial Notification	N/A										Ψ	,
b. Notification of Compliance Status	4.00			1.0	4.0	0.0	0.0	0.0	0.0	\$0	\$0	0
c. Annual Compliance Certification (d)	4.00			1.0			0.0	0.0			\$0	
d. Report of Exceedences (e)	10.00			1.0			0.0	0.0	0.0	\$0	\$0	
		¢250.000										
e. Develop process fugives ventilation plan	80.00 10.00	\$250,000		1.0 1.0	80.0 10.0	2.0	160.0 20.0	1.0 1.0		\$15,704 \$2,094	\$500,000	
f. Update fugitive dust control plan						-					\$0	
g. Update baghouse monitoring plan	10.00			1.0				1.0	2.0		\$0	
h. Develop bagleak detection system SOP	20.00			1.0 188.0	20 681.0		40 280.0	4.4	4 28.0	\$4,038 \$27,879	\$500,000	
Reporting Subtotal 4. Recordkeeping Requirements				18810	0.180	10.0	280.0	4.4	28.0	\$21,879	ຈວບບ,ບບປ	8.0
A. Read instructions	See 3A										\$0	
B. Implement activities	N/A										\$0	
C. Develop record system	N/A										\$0	0
D. Time to enter information	1.00											
E. Records of all info. required by standards (f)	1.00			60.0	60.0		0.0				\$0	
F. Time to train personnel	20.00			1.0	20.0	2.0	40.0	1.0			\$0	
G. Time for audits	N/A			61.0			40.0	0.0		\$0	\$0	
Recordkeeping Subtotal				61.0	80.0	-		1.0	-		\$0	-
TOTAL				249.0	761.0	12.0	320.0	5.4			\$500,000	8.0
				-	-	-	Total Hours	Labor Cost		Total	4	
				Summary of r		den	357	\$31,917		\$ 531,917	4	
				Initial capital a		1.0.0.1			\$0		4	
	Annualized Capital/startup and O&M							\$500,000		J		

N/A = Not Applicable.

(a) Costs are based on the following hourly rates: technical at \$71.95, management at \$115.94, and clerical at \$34.17.

(b) One-time activity. There are an estimated 2 existing ferroalloys production facilities and no new facilities are expected.

(c) Weekly method 9, with initial tests estimated to occur in Year 2 of ICR. Assumes in-house readers.

(d) The 2 existing plants would be required to submit an Annual Compliance Certification at the end of Year 2 of the ICR and each year thereafter.

(e) Assumes that 2 facilities per year would have to submit a Report of exceedence.

(f) Recordkeeping requirements begin in Year 2 of ICR clearance period for all existing plants.

TABLE 2. YEAR 2 ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR FERROALLOYS PRODUCTION: FERROMANGANESE AND SILICOMANGANESE

No. of performance No. of		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
Person kan Current in preson kan Current in preson kan preson kan <td></td> <td>(~)</td> <td>(6)</td> <td>(0)</td> <td></td> <td>()</td> <td>(-)</td> <td>(0)</td> <td>(1)</td> <td>U)</td> <td>(3)</td> <td>(15)</td> <td>(Ľ)</td>		(~)	(6)	(0)		()	(-)	(0)	(1)	U)	(3)	(15)	(Ľ)
Person-base Contractor precurrence contrence per precurrence per year per year per year Technical per year Description per year Descrip				Other non		Person-hours							
ppr Columne columne columne responder		Person-hours	Contractor					Technical	Management	Clarical	Total Jabor	Total non-	Total number
ccurrence ccurrence per year per year <					-		Pesnondents		-				
L. papticalino: Implication NA Implication (AuD) (Be/S) (Ge/S)									-				
1. Applications NA		occurrence	occurrence	occurrence	per year		per year				year		
2. Sinky and Studies NA NA <td>1. Applications</td> <td>N/A</td> <td></td> <td></td> <td></td> <td>(100)</td> <td>-</td> <td></td> <td>(0x0.00)</td> <td>(0,0.1)</td> <td></td> <td></td> <td>(0,1)</td>	1. Applications	N/A				(100)	-		(0x0.00)	(0,0.1)			(0,1)
3. Reporting Hoguseness m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m m <td></td>													
A. Reading transmitutions (b) D D200 D D200 D D D200 D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D D <thd< th=""></thd<>													
B. Regurad acturities Instit Compliance Ister (M). Hol, P.A.H, formadeleyde) - Funace PF FF ISO Social Compliance Ister (M). Hold Nucl. Nucl. Hig. P.A.H. formadeleyde) - Funace PF FFSchr ISO Social Compliance Ister (M). Hold Nucl. Nucl. Hig. P.A.H. formadeleyde) - Funace NP FFSchr ISO Social Compliance Ister (M). Hold Nucl. Nucl. Hig. P.A.H. formadeleyde) - Funace NP FFSchr ISO Social Compliance Ister (M). Hold Nucl. Nucl. Hig. P.A.H. formadeleyde) - Funace NP FFSchr ISO Social Compliance Ister (M). Hold Nucl. Nucl. Hig.		20.00			1.0	20.0	0.0	0.0	0.0	0.0	\$0	\$0	0
initial Compliance test (PM, HC), HQ, PAH, Smandaleyde), Funnase PFFS theory 15.00 \$3.0 4.50 1.0 4.50 0.5 4.5 34.48 \$800000 0. Initial Compliance test (PM, HC), PAH, Smandaleyde), Funnase PFFS theory 20.00 \$85.000 3.5 700 2.0 64.0 1.0 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00													
b. Initial Compliance test (M) UN State Compliance test (M) State Compliance tes		15.00	\$200.000		3.0	45.0	1.0	45.0	0.5	4.5	\$4,450	\$600.000	3
C. Initial Compliance test (PM) – Bildy Yent //142 Cassing/misc. sources NP FF 20.00 35.000 35.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00 32.00													3
1. Weekly Method 9 (c) 200 200 312.0 220 62.0 1.0 62.4 \$50.01 Netail Capital 2.00 \$50.00 1.0 2.0 0.5 0.2 \$50.00 Annual (OAM) 2.0 \$50.00 1.0 2.0 1.0 2.0 0.5 0.2 \$50.00 1. Bas Lask Detection System - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - <td< td=""><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>7</td></td<>													7
e. Pressure droppling drow rate CPMS senabler C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C C <thc< th=""> C<td></td><td></td><td> ,</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>0</td></thc<>			,										0
Initial Capital 2.00 \$\$0,000 1.0 2.0 1.0 2.0 0.5 0.2 \$\$269 \$\$0,000 I. Bag Lack Detection System										-	, .		
Armail (0.8M) 1.0 2.0 1.0 2.0 0.5 0.2 9220 318.000 1 Big Lask Decision System 4.0 \$220,978 0.0 1.0 0.4 \$553 \$520,148 Annual (0.8M) 4.0 \$219,078 0.5 2.0 2.0 4.0 1.0 0.4 \$553 \$529,078 1 nitial Capital 2.0 \$41,400 0.5 1.0 2.0 2.0 1.0 0.2 \$344 \$41,400 1 Annual (0.8M) 2.0 \$41,400 0.5 1.0 2.0 4.0 0.4 \$538 \$29,078 Annual (0.8M) 2.0 \$41,400 0.5 1.0 2.0 4.0 0.4 \$43,838 \$30 1. Annual Compliance test - Furace Schr (PM, Hg), Furace FF (Hg) 2.00 \$5,000 1.0 2.0 0.0 0.0 0.0 \$30 \$30 C-reate information See 38 \$30 \$30 \$30 \$30 \$30		2.00		\$50,000	1.0	2.0	1.0	2.0	0.5	0.2	\$269	\$50,000	0
I Big Loak Detection System Image Capital													0
Initial Capital 4.0 5299,146 0.5 2.0 2.0 4.0 1.0 0.4 5589 \$269,148 Annual (O&M) 4.0 5219,078 0.5 2.0 2.0 4.0 1.0 0.4 5539 \$221,078 g. Ductwork flow rate monitoring 2.0 \$41,400 0.5 1.0 2.0 1.0 0.2 \$344,4 \$41,400 Annual (O&M) 2.0 \$41,400 0.5 1.0 2.0 1.0 0.2 \$3444 \$41,400 I. Annual Compliance test Funce Capture System Inspection (Quarterly) 2.0 1.0 2.0 0.0 0.0 0.0 \$40.3 \$50 C. Create information See 38 0 0 0 0 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 <td></td> <td>+==,+==</td> <td></td>												+==,+==	
Annual (O&M) 4.0 \$229,078 0.5 2.0 2.0 4.0 1.0 0.4 \$558 \$529,078 Duckvok föv atte molitoring 2.0 \$41,400 0.5 1.0 2.0 1.0 0.2 \$344 \$41,400 Arrual (O&M) 2.0 \$41,400 0.5 1.0 2.0 1.0 0.2 \$344 \$41,400 Intrade Capture System Inspection (Quaterity) 2.0 \$40,40 0.5 1.0 2.0 0.0 0.0 0.0 \$40,8 \$50,00 I. Annal Compliance Estication (formation See 38 Image: Capture System Inspection (Quaterity) \$60,00 0.0 0.0 0.0 \$60 \$60 C. Create information See 38 Image: Capture System Inspection (Quaterity) Image: Capture System Inspection (Quaterity) \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$60 \$6		4.0		\$269.148	0.5	2.0	2.0	4.0	1.0	0.4	\$538	\$269.148	0
ID Implied Capital 2.0 S41.400 0.5 1.0 2.2 2.3 3.3.4 5.1.4 Annual (ORM) 2.0 54.1.400 0.5 1.0 2.0 1.0 0.2 53.4.4 54.1.400 I. Furnace Capitar Bystem Inspection (Quarterly) 2.00 55.000 1.0 2.0 0.0 0.0 0.00 0.00 50 500 C-create information See 38 Implies Capitar Bystem Inspection (Quarterly) 2.00 55.000 Implies Capitar Bystem Inspection (Quarterly) 30 30 C-create information See 38 Implies Capitar Bystem Inspection (Quarterly) 30 30 30 C-state information See 38 Implies Capitar Bystem Inspection (Quarterly) 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0 1.0													0
Initial Capital 2.0 \$41.400 0.5 1.0 2.0 2.0 1.0 0.2 \$344 \$41.400 Annual (CoM) 2.0 \$41.40 5 1.0 2.0 2.0 1.0 0.2 \$344 \$41.400 I. Funcace Capture System Inspection (Quarterly) 2.0 1.0 20.0 2.0 40.0 1.0 4.0 \$44.08 \$90 I. Annual Compliance test - Funce Schr (PM, Hg), Funace FF (Hg) 20.00 \$5000 1.0 20.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0										-			
Annual (OkM) 2.0 \$4,140 0.5 1.0 2.0 2.0 40.0 1.0 0.2 33.44 93.10 1. Annual Compliance test - Furrace Schr (PM, Hg), Furrace FF (Hg) 20.00 \$5,000 1.0 20.0 0.0 0.0 0.0 0.0 0.0 90 C-create information See 38 90 D. Gather existing information See 38 90 C. create information See 38 90 A initial Molication See 38 90 C. Annual Compliance Cartilication (1) NVA 90 C. Annual Compliance Cartilication (2) 1.00 1.00 1.00 2.0 1.0 2.0 30 90 90 C. Annual Compliance Cartilication (2) 1.00 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0		2.0		\$41,400	0.5	1.0	2.0	2.0	1.0	0.2	\$344	\$41,400	0
In-Funce Capture System Inspection (Quarterly) 2.0 2.0 10.0 2.0 4.00 54.08 500 1. Annual Compliance test - Furnace Schr (PM, Hg), Furnace FF (Hg) 200 \$\$5,000 1.0 20.0 0.0 0.0 0.0 0.0 0.0 \$\$0 \$\$0 C. Create information See 38 \$\$0 D. Gather existing information See 38 \$\$0 C. Create information See 38 \$\$0 C. Create information N/A \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0				\$4,140									0
1. Annual Compliance Eest - Furnace Scrib (PM, Hg), Furnace FF (Hg) 20.00 \$\$0,000 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 <td></td> <td></td> <td></td> <td>÷ .,=</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>				÷ .,=									
C. Create information See 38 Image:			\$5.000										
D Gather existing information See 38 Image: See 38 Image: See 38 Image: See 38 Image: See 38			,										
E. Wite report Image: marked state in the intermed and state in the intermediate intermed and state in the intermediate intermed and state in the intermediate i													
a. Initial Notification N/A Image: constraint of Compliance Status Mode Image: constraint of Co	-												
D. Notification of Compliance Status 4.0 1.0 4.0 0.0 0.0 0.0 0.0 50 50 c. Annual Compliance Certification (d) 10.0 1.0 10.0 2.0 20.0 1.0 2.0 \$2,094 \$0 d. Report of Exceedences (e) 10.0 1.0 10.0 2.0 \$2,094 \$0 e. Develop process lugives vertilation plan 80.0 \$250,000 1.0 80.0 0.0 0.0 0.0 0.0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0		N/A											
c. Annual Compliance Certification (d) 10.0 10.0 10.0 2.0 20.0 1.0 2.0 \$2.094 \$50 d. Report of Exceedences (e) 10.0 10 10.0 2.0 20.0 1.0 2.0 \$2.094 \$50 e. Develop process tugives wentilation plan 10.0 1.0 10.0 0.0 0.0 0.0 0.0 \$50 \$50 g. Update bugives wentilation plan 10.0 1.0 10.0 0.0 0.0 0.0 \$50 \$50 g. Update bugives wentilation plan 10.0 1.0 10.0 0.0 0.0 0.0 \$50 \$50 Reporting Subtotal 10.0 1.0 20.0 0.0 0 0 \$50 \$51,032,218 A. Read instructions See 3A Image: State		4.0			1.0	4.0	0.0	0.0	0.0	0.0	\$0	\$0	0
d. Report of Exceedences (e) 10.0 10.0 10.0 2.0 20.0 1.0 2.0 \$\$2,094 \$\$0 e. Develop process tigives ventilation plan 80.0 \$\$25,000 1.0 80.0 0.0 0.0 0.0 0.0 \$\$0 \$\$0 g. Update baghouse monitoring plan 10.0 10.0 10.0 0.0 0.0 0.0 0.0 \$\$0 \$\$0 g. Update baghouse monitoring plan 10.0 10.0 10.0 0.0 0.0 0.0 \$\$0 \$\$0 h. Develop bagleak detection system SOP 20.0 1.0 20.0 0.0 0 0 \$\$0 \$\$0 A. Recordkeeping Requirements 188.5 686.0 22.0 950.0 11 95.0 \$\$1,032.218 A. Read instructions See 3A Image: tight standards \$\$0 \$\$0 \$\$0 \$\$0 C. Develop record system N/A Image: tight standards Image: tight standards \$\$0 \$\$0 \$\$0 \$\$0 D. Time to artin personnel 1.0 60.0 60.0 0.0 0.0 \$\$0 \$\$0 <td></td>													
e. Develop process lugives ventilation plan 80.0 \$250,000 1.0 80.0 0.0 0.0 0.0 0.0 \$0 \$0 1. Update lugitive dust control plan 10.0 1.0 10.0 0.0 0.0 0.0 0.0 \$0 \$0 \$0 \$0 0. Update baglouse monitoring plan 10.0 1.0 10.0 0.0 0.0 0.0 0.0 \$0 \$0 \$0 D. Update baglouse monitoring plan 10.0 1.0 10.0 0.0 0.0 0.0 \$0 \$0 \$0 Reporting Subtotal 20.0 10.0 20 0.0 0 0 \$0 \$0 \$0 Recordkeeping Requirements 20.0 188.5 686.0 22.0 950.0 11 95.0 \$94,002 \$1,032,218 A. Recordkeeping Requirements 20.0 188.5 686.0 22.0 950.0 11 95.0 \$94,002 \$1,032,218 A. Recordkeeping Requirements See 3A 20 188.5 686.0 22.0 95.0 10 \$0 \$0 \$0 \$0 <td></td>													
f. Update fugitive dust control plan 10.0 1.0 10.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0<		80.0	\$250,000		1.0				0.0	0.0			
g. Update baghouse monitoring plan 10.0 10.0 10.0 0.0 0.0 0.0 0.0 \$0 \$0 \$0 h. Develop bagleak detection system SOP 20.0 1.0 20 0.0 0 0 0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0		10.0			1.0	10.0	0.0	0.0	0.0	0.0			
h. Develop bagleak detection system SOP 20.0 1.0 20 0.0 0 0 \$0 \$0 \$0 Reporting Subtotal 188.5 686.0 22.0 950.0 11 95.0 \$94,002 \$1,032,218 A. Read instructions See 3A Implement activities NA Implement activities Im		10.0			1.0	10.0	0.0	0.0	0.0	0.0			0
4. Recordkeeping Requirements See 3A Image: See 3A Image		20.0			1.0	20	0.0	0	0	0	\$0	\$0	0
A. Read instructions See 3A Implement activities Implement act	Reporting Subtotal				188.5	686.0	22.0	950.0	11	95.0	\$94,002	\$1,032,218	17.0
B. Implement activities N/A N/A Implement activities													
C. Develop record system N/A Image:	A. Read instructions	See 3A							\$0	0			
D. Time to enter information Image: constraint of the information E. Records of all info. required by standards (f) 1.0 60.0 60.0 0.0 0.0 0.0 0.0 \$4,03 \$0 F. Time to train personnel 20.0 1.0 20.0 2.0 40.0 1.0 4.0 \$4,038 \$0 G. Time for audits N/A Image: constraint of the information 0.0 0.0 0.0 \$0 \$0 Recordkeeping Subtotal Image: constraint of the information 1.0 249.5 766.0 24.0 990.0 12.0 99.0 \$98,040 \$1,032,218 TOTAL Summary of respondent burden 1,01 \$98,040 \$1,032,218 Initial capital and startup Initial capital and startup \$360,548 \$1,032,258 \$1,130,258	B. Implement activities	N/A									\$0	0	
E. Records of all info. required by standards (f) 1.0 60.0 60.0 0.0 0.0 0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0 \$0.0	C. Develop record system	N/A										\$0	0
F. Time to train personnel 20.0 1.0 20.0 20.0 40.0 1.0 4.0 \$4,038 \$0 G. Time for audits N/A Image: Constraint of the second secon	D. Time to enter information												
G. Time for audits N/A Image: Constraint of the system of	E. Records of all info. required by standards (f)	1.0			60.0	60.0	0.0	0.0	0.0	0.0	\$0	\$0	0
G. Time for audits N/A Image: Constraint of the system of	F. Time to train personnel	20.0			1.0	20.0	2.0	40.0	1.0	4.0	\$4,038	\$0	0
TOTAL 249.5 766.0 24.0 990.0 12.0 99.0 \$\$98,040 \$1,032,218 Total Hours Labor Cost Non-Labor Total Summary of respondent burden 1,101 \$\$98,040 \$1,032,218 Initial capital and startup 1,101 \$\$98,040 \$1,032,218		N/A							0.0	0.0		\$0	0
TOTAL 249.5 766.0 24.0 990.0 12.0 99.0 \$\$98,040 \$\$1,032,218 Image: Constraint of the system of the sy	Recordkeeping Subtotal				61.0	80.0	2.0	40.0	1.0	4.0	\$4,038	\$0	0
Summary of respondent burden 1,101 \$98,040 \$1,032,218 \$1,130,258 Initial capital and startup \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548 \$360,548					249.5	766.0	24.0	990.0	12.0	99.0	\$98,040	\$1,032,218	17.0
Initial capital and startup \$360,548								Total Hours	Labor Cost	Non-Labor	Total		
					Summary of r	espondent bu	rden	1,101	\$98,040	\$1,032,218	\$ 1,130,258]	
Annualized Capital/statum and O&M \$1.032.218					Initial capital a	and startup]	
					Annualized C	apital/startup	and O&M			\$1,032,218			

N/A = Not Applicable.

(a) Costs are based on the following hourly rates: technical at \$71.95, management at \$115.94, and clerical at \$34.17.

(b) One-time activity. There are an estimated 2 existing ferroalloys production facilities and no new facilities are expected.
 (c) Weekly method 9, with initial tests estimated to occur in Year 2 of ICR. Assumes in-house readers.

(d) The 2 existing plants would be required to submit an Annual Compliance Certification at the end of Year 2 of the ICR and each year thereafter. (e) Assumes that 2 facilities per year would have to submit a Report of exceedence.

(f) Recordkeeping requirements begin in Year 2 of ICR clearance period for all existing plants.

TABLE 3. YEAR 3 ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR FERROALLOYS PRODUCTION: FERROMANGANESE AND SILICOMANGANESE

No. of personal No. of current current No. of personal No. of current No. of personal No. of persona No. of persona No. of		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)
Personal Currice of personal <th< td=""><td></td><td>()</td><td>(5)</td><td>(0)</td><td></td><td>(_)</td><td>.,</td><td>(0)</td><td>()</td><td>()</td><td>(0)</td><td>(,</td><td>(=)</td></th<>		()	(5)	(0)		(_)	.,	(0)	()	()	(0)	(,	(=)
Person-no countersContaction person countersPerson-no person person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no person-no <br< td=""><td></td><td></td><td></td><td>Other non-</td><td></td><td>Person-hours</td><td></td><td></td><td></td><td></td><td></td><td>1</td><td></td></br<>				Other non-		Person-hours						1	
pp course course course course responder persponder pers		Person-hours	Contractor				1	Technical	Management	Clerical	Total labor	Total non-	Total number
countercountercounterper yearper year<							Respondents		-				
Applications NA Image: Applications NA Image: Applications State				-					-				
Applications N/A N/A N/A N/A <th< td=""><td></td><td>occurrence</td><td>ooodinonioo</td><td>ocounteneo</td><td>por you.</td><td></td><td>por your</td><td></td><td></td><td></td><td>you</td><td></td><td></td></th<>		occurrence	ooodinonioo	ocounteneo	por you.		por your				you		
Reporting Regularing	1. Applications	N/A				(()	(0)	(0)		((= •)=)	(=)
Real end analysis 200 Image of an analysis 200 00 00 00 00 90 90 A. Intal Compliance test (PM, HCL, Hg, PAH, formaldelyde) - Funce PF FFCstr 15.00 \$200.00 3.0 45.0 0.0 0.0 0.0 0.0 50 50 C. Intal Compliance test (PM, HCL, Hg, PAH, formaldelyde) - Funce PF FFCstr 2.00 85.000 3.5 7.0 0.0 0.0 0.0 50 50 C. Intal Compliance test (PM, HCL, RG, PAH, formaldelyde) - Funce PF FFCstr 2.00 85.000 1.50 3.0 45.0 0.0 0.0 0.0 0.0 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50 50	2. Survey and Studies	N/A											
Request activities Image of the second set of MH, IC, Ng, PAH, formaldehyde - Funace PP FF ISSO 3.0 4.5.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 </td <td>3. Reporting Requirements</td> <td></td>	3. Reporting Requirements												
Request activities Image of the second set of MH, IC, Ng, PAH, formaldehyde - Funace PP FF ISSO 3.0 4.5.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 </td <td>A. Read instructions (b)</td> <td>20.00</td> <td></td> <td></td> <td>1.0</td> <td>20.0</td> <td>0.0</td> <td>0.0</td> <td>0.0</td> <td>0.0</td> <td>\$0</td> <td>\$0</td> <td>C</td>	A. Read instructions (b)	20.00			1.0	20.0	0.0	0.0	0.0	0.0	\$0	\$0	C
a. Initial Compliance test (PM, HC). Hg. PAM, Emmale/Priority - Functional PFF/Scht 15.00 3.00 4.50 0.0 0.0 0.0 0.0 9.0 c. Initial Compliance test (PM, HC). Hg. PAM, Emmale/PFF 2000 \$55,000 3.0 4.50 0.0 0.0 0.0 0.0 9.0 c. Initial Compliance test (PM, HC). Hg. PAM, Emmale/PFF 2000 \$55,000 3.0 4.50 0.0 0.0 0.0 0.0 0.0 9.0 9.0 c. Initial Compliance test (PM, HC). Hg. PAM, Emmale/PMB, Hamale/PMB, PAM, Emmale/PMB, PAM, PAM, PAM, PAM, PAM, PAM, PAM, PAM	B. Required activities												
b. Initial Compliance test (PM, H2), H2, H2, H2, H2, H2, H2, H2, H2, H2, H2		15.00	\$200.000		3.0	45.0	0.0	0.0	0.0	0.0	\$0	\$0	0
c. milal Compliance test (PM) – Bidg Verti./PI2 casting/misc. sources NP FF 20.00 3.5 70.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0													
d. Weeky Method 9 (c) 12:0 0 624 10.0 62.4 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000 \$\$000													
e. Pressice dropflagd flow rate CPMS-senubler Image													
Initial Capital 2.00 \$\$5000 1.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	e. Pressure drop/liquid flow rate CPMS-scrubber		1						1.0			† * * * * * * * * * * * * * * * * * * *	Ì
Annual (Okk) 2.0 31.00 1.0 2.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0		2.00		\$50,000	1.0	0.0	0.0	0.0	0.0	0.0	\$0	\$0	0
I agu & DateCoine System Image I													
Initial Capital 4.0 \$\$269.148 0.5 0.0 0.0 0.0 0.0 90 Annual (CAM) 4.0 \$\$210.078 0.5 2.0 4.0 1.0 0.4 \$\$338 \$\$210.078 0.DCKOW: flow rate monitoring 2.0 \$\$41.40 0.5 1.0 2.0 0.0 0.0 0.0 0.0 50 50 Annual (CAM) 2.0 \$\$41.40 0.5 1.0 2.0 2.0 4.0 1.0 0.2 \$\$44.40 Initial Capital 2.0 \$\$41.40 0.5 1.0 2.0 2.0 4.00 1.0 4.0 \$\$4,028 \$\$00 Annual Compliance test - Furnace Schr (PM, Hg), Furnace FF (Hg) 2.00 \$\$5000 50 10.0 1.0 1.0 \$\$00 50 50 1.0 1.0 1.0 \$\$00 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0 \$\$0		2.0		\$10,000	1.0	2.0	1.0	2.0	0.5	0.2	\$203	\$10,000	
Annual (OkM) 4.0 \$210,078 0.5 2.0 4.0 1.0 0.4 \$538 \$220,078 Initial Capital 2.0 \$41,400 0.5 0.0 0.0 0.0 0.0 500 300 300 300 Annual (OkM) 2.0 \$41,400 0.5 1.0 2.0 1.0 0.2 \$344 \$41,40 Annual (OkM) 2.0 \$5,000 5.0 1.00 0.5 1.00 0.5 1.00 9.797 \$25,000 . Create information See 38 2 1.00 0.5 1.00 0.5 1.00 9.797 \$25,000 . Create information See 38 2 1.0 1.00 0.5 1.00 0.5 1.00 2.0 1.0 2.0 1.0 2.0 1.00 2.0 1.00 2.0 1.00 2.0 1.00 2.0 1.00 2.0 1.00 2.0 1.00 2.0 1.00 2.0 1.00 2.0 1.00		4.0		\$269 1/18	0.5	0.0	0.0	0.0	0.0	0.0	0\$	¢۵	· · · ·
g. Ductwork flow rate monitoring Image													
Initial Capital 2.0 \$41,400 0.5 0.0 0.0 0.0 0.0 \$00 \$00 \$00 Annual (CAM) 2.0 \$4,140 0.5 10.0 2.0 2.0 10.0 2.0 2.0 10.0 2.0 \$4.00 10.0 2.0 4.00 \$4.00 \$4.00 10.0 2.0 2.0 10.0 2.0 \$4.00 \$4.00 10.0 10.0 10.0 4.0 \$4.03.8 \$50 10.0 10.0 \$4.00 \$4.00 \$4.00 \$6.0 10.0 10.0 \$6.0 10.0 \$6.0 10.0 \$6.0 10.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0 \$6.0		4.0		ΨΖ13,070	0.5	2.0	2.0	4.0	1.0	0.4	\$550	Ψ213,070	`
Annual (Q&M) 2.0 \$4,140 0.5 1.0 2.0 1.0 0.2 \$344 \$4,140 I. Annual Compliance test - Funace Schtr (PM, Hg), Funace FF (Hg) 20.0 \$500 100.0 100 100.0 0.5 100.0 0.5 100.0 \$50 100.0 0.5 100.0 \$50 100.0 0.5 100.0 \$50 100.0 0.5 100.0 \$50 100.0 \$50 100.0 \$50 100.0 \$50 100.0 \$50 100.0 \$50 100.0 \$50 100.0 \$50 100.0 \$50 100.0 \$50 100.0 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50 \$50		2.0		¢41.400	0.5	0.0	0.0	0.0	0.0	0.0	¢0	¢0	
h. Funce Capture System Inspection (Quarterly) 2.0 10.0 2.0 4.0.0 1.0.0 4.0.0 4.0.0 5.0.00 5.0 10.0 10.0 0.0.0 5.0.0 5.0.0 5.0.0 10.0 0.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0 5.0.0													
LAmual Compliance test - Furnace Schr (PM, Hg), Furnace FF (Hg) 20.00 \$5,000 5.0 100.0 0.5 10.0 \$9,797 \$25,000 . Greate information See 38 30 . Greate information See 38 30 . Write report 				\$4,140									
Create information See 38 Image: See			¢E 000										
Gather existing information See 38 Image and the set of the set			\$5,000		5.0	100.0	1.0	100.0	0.5	10.0	\$9,797		5
I.Wite report N/A Image: constraint of Compliance Status N/A Image: constraint of Compliance Status Solution a. Initial Notification of Compliance Status 4.0 1.0 4.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0													
a. Initial Notification N/A Image: Second Seco		SEE 3D											
b. Notification of Compliance Status 4.0 1.0 4.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 <td></td> <td>\$0</td> <td></td>												\$0	
c. Annual Compliance Certification (d) 10.0 10.0 10.0 2.0 20.0 1.0 2.0 \$2.094 \$0 d. Report of Exceedences (e) 10.0 10.0 10.0 2.0 0.0 0.0 \$2.094 \$0 e. Develop process fugiess explicition plan 80.0 \$250,000 1.0 80.0 0.0 0.0 0.0 0.0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0					1.0						.		
d. Report of Exceedences (e) 10.0 10.0 10.0 20.0 1.0 2.0 \$2,094 \$0 e. Develop process tigvies ventilation plan 80.0 \$250,000 1.0 80.0 0.0 0.0 0.0 0.0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0													
e. Develop process fugiese sentilation plan 80.0 \$250,000 1.0 80.0 0.0 0.0 0.0 0.0 0.0 \$0 \$0 4. Update fugitive dust control plan 10.0 1.0 10.0 0.0 0.0 0.0 0.0 0.0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 <td></td>													
f. Update fugitive dust control plan 10.0 10.0 10.0 0.0 0.0 0.0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0			+0=0.000										
g. Update baghouse monitoring plan 10.0 1.0 10.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 <td></td> <td></td> <td>\$250,000</td> <td></td>			\$250,000										
h. Develop bagleak detection system SOP 20.0 1.0 20.0 0.0 0 0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0													
eporting Subtotal 192.5 761.0 14.0 812.0 7 81.2 \$79,988 \$266,218 9 . Recordkeeping Requirements See 3A Implement activities See 3A See 3A See 3A See 3A Implement activities See 3A See 3A<									0.0	0.0			
Recordkeeping Requirements See 3A Image: S		20.0							0	0			
. Read instructions See 3A Implement activities N/A Implement activities N/A Implement activities Implement ac					192.5	761.0	14.0	812.0	7	81.2	\$79,988	\$266,218	9.0
. Implement activities N/A Implement activities Implement acti													
Develop record system N/A Image on their information Image on their information<							ļ						
. Time to enter information 1.0 60.0 60.0 0.0 0.0 0.0 \$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$							ļ						
. Records of all info. required by standards (f) 1.0 60.0 60.0 0.0 0.0 0.0 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00 \$00		N/A					ļ					\$0	0
. Time to train personnel 20.0 1.0 20.0 2.0 40.0 1.0 4.0 \$4,038 \$0 Time for audits N/A Image: Constraint of audits 0.0 0.0 0.0 \$0 \$0 ecordkeeping Subtotal N/A Image: Constraint of audits 80.0 2.0 40.0 1.0 4.0 \$4,038 \$0 OTAL 61.0 80.0 2.0 40.0 1.0 4.0 \$4,038 \$0 OTAL 50 50 50 50 50 50 50 \$266,218 \$266,218 \$266,218 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244 \$350,244													
N/A 61.0 80.0 0.0 0.0 \$0 ecordkeeping Subtotal 61.0 80.0 2.0 40.0 1.0 4.03 \$4,038 \$0 OTAL 253.5 841.0 16.0 852.0 8.0 85.2 \$84,026 \$266,218 \$9 OTAL Vital Hours Labor Cost Non-Labor Total Initial capital and startup 945 \$84,026 \$266,218 \$ 350,244													
ecordkeeping Subtotal 61.0 80.0 2.0 40.0 1.0 4.0 \$4,038 \$0 OTAL 253.5 841.0 16.0 852.0 8.0 85.2 \$84,026 \$266,218 9 Total Hours Labor Cost Non-Labor Total Summary of respondent bur 945 \$266,218 \$ 350,244 Initial capital and startup \$\$0					1.0	20.0	2.0	40.0					
OTAL 253.5 841.0 16.0 852.0 8.0 85.2 \$84,026 \$266,218 9 Total Hours Labor Cost Non-Labor Total Summary of respondent bur 945 \$ 350,244 \$ 350,244 Initial capital and startup		N/A											
Total Hours Labor Cost Non-Labor Total Summary of respondent bur 945 \$\$84,026 \$\$266,218 \$\$350,244 Initial capital and startup \$\$ \$\$0 \$\$0 \$\$00	Recordkeeping Subtotal												
Summary of respondent bur 945 \$84,026 \$266,218 \$ 350,244 Initial capital and startup \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ <	TOTAL				253.5	841.0	16.0	852.0	8.0	85.2	\$84,026	\$266,218	9.0
Initial capital and startup \$0								Total Hours	Labor Cost	Non-Labor	Total		
						Summary of	respondent bur	945	\$84,026	\$266,218	\$ 350,244]	
Annualized Capital/startup and Q&M \$266.218						Initial capital	and startup					1	
						Annualized C	apital/startup a	and O&M		\$266,218]	

N/A = Not Applicable.

(a) Costs are based on the following hourly rates: technical at \$71.95, management at \$115.94, and clerical at \$34.17.

(b) One-time activity. There are an estimated 2 existing ferroalloys production facilities and no new facilities are expected.
 (c) Weekly method 9, with initial tests estimated to occur in Year 2 of ICR. Assumes in-house readers.

(d) The 2 existing plants would be required to submit an Annual Compliance Certification at the end of Year 2 of the ICR and each year thereafter. (e) Assumes that 2 facilities per year would have to submit a Report of exceedence.

(f) Recordkeeping requirements begin in Year 2 of ICR clearance period for all existing plants.

TABLE 4. SUMMARY OF ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR
FERROALLOYS PRODUCTION: FERROMANGANESE AND SILICOMANGANESE

						Non-Labor (annualized	
			Management	Total Labor		Capital/Startup	
Year	Technical Hours	Clerical Hours	Hours	Hours	Labor Cost	and O&M) Costs	Total Costs
1	320	32	5	357	\$31,917	\$500,000	\$531,917
2	990	99	12	1,101	\$98,040	\$1,032,218	\$1,130,258
3	852	85	8	945	\$84,026	\$266,218	\$350,244
Total	2,162	216	25	2,404	\$213,984	\$1,798,436	\$2,012,420
Average	721	72	8	801	\$71,328	\$599,479	\$670,807

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

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
		No. of						
	EPA person-	occurrences	EPA person-		Technical	Management	Clerical	
	hours per	per plant per	hours per	Plants per	person-hours	person-hours	person-hours	
	occurrence	year	plant per year	year	per year	per year	per year	Cost,\$ (a)
Activity			(C=AxB)		(CxD)	(Ex0.05)	(Ex0.1)	
Report Review								
Initial Notification (b)	1.0	1.0	1.0	0.7	0.7	0.0	0.1	\$35
Notification of Compliance Status (c)	10.0	1.0	10.0	0.7	6.7	0.3	0.7	\$345
Annual Compliance Certification (d)	2.0	1.0	2.0	2.0	4.0	0.2	0.4	\$207
Report of Exceedence (e)	2.0	1.0	2.0	2.0	4.0	0.2	0.4	\$207
Review compliance monitoring plans prepared by plants	10.0	0.0	0.0	2.0	0.0	0.0	0.0	\$0
TOTAL BURDEN AND COST (SALARY)					15.3	0.8	1.5	\$795

(a) Costs are based on the following hourly rates: technical at \$53.17, management at \$62.90, and clerical at \$37.87.

Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

(b) The affected 2 plants will submit the initial notification, leading to an average annual burden of 0.7 plants/yr in Year 1.

(c) The affected 2 plants will submit the notification of compliance status, leading to an average annual burden of 0.7 plants/yr in Year 1.

(d) The affected 2 plants will submit an annual compliance certification each year.

(e) Assumes that 2 facilities per year would have to submit an exceedance report per year.

N/A = Not applicable.

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

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
		No. of						
	EPA person-	occurrences	EPA person-		Technical	Management	Clerical	
	hours per	per plant per	hours per	Plants per	person-hours	person-hours	person-hours	
	occurrence	year	plant per year	year	per year	per year	per year	Cost,\$ (a)
Activity			(C=AxB)		(CxD)	(Ex0.05)	(Ex0.1)	
Report Review								
Initial Notification (b)	1.0	1.0	1.0	0.7	0.7	0.0	0.1	\$35
Notification of Compliance Status (c)	10.0	1.0	10.0	0.7	6.7	0.3	0.7	\$345
Annual Compliance Certification (d)	2.0	1.0	2.0	2.0	4.0	0.2	0.4	\$207
Report of Exceedence (e)	2.0	1.0	2.0	2.0	4.0	0.2	0.4	\$207
Review compliance monitoring plans prepared by plants	10.0	4.0	40.0	2.0	80.0	4.0	8.0	\$4,146
TOTAL BURDEN AND COST (SALARY)					95.3	4.8	9.5	\$4,940

(a) Costs are based on the following hourly rates: technical at \$53.17, management at \$62.90, and clerical at \$37.87.

Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

(b) The affected 2 plants will submit the initial notification, leading to an average annual burden of 0.7 plants/yr in Year 1.

(c) The affected 2 plants will submit the notification of compliance status, leading to an average annual burden of 0.7 plants/yr in Year 1.

(d) The affected 2 plants will submit an annual compliance certification each year.

(e) Assumes that 2 facilities per year would have to submit an exceedance report per year.

N/A = Not applicable.

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

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
		No. of						
	EPA person-	occurrences	EPA person-		Technical	Management	Clerical	
	hours per	per plant per	hours per	Plants per	person-hours	person-hours	person-hours	
	occurrence	year	plant per year	year	per year	per year	per year	Cost,\$ (a)
Activity			(C=AxB)		(CxD)	(Ex0.05)	(Ex0.1)	
Report Review								
Initial Notification (b)	1.0	1.0	1.0	0.7	0.7	0.0	0.1	\$35
Notification of Compliance Status (c)	10.0	1.0	10.0	0.7	6.7	0.3	0.7	\$345
Annual Compliance Certification (d)	2.0	1.0	2.0	2.0	4.0	0.2	0.4	\$207
Report of Exceedence (e)	2.0	1.0	2.0	2.0	4.0	0.2	0.4	\$207
Review compliance monitoring plans prepared by plants	10.0	0.0	0.0	2.0	0.0	0.0	0.0	\$0
TOTAL BURDEN AND COST (SALARY)					15.3	0.8	1.5	\$795

(a) Costs are based on the following hourly rates: technical at \$53.17, management at \$62.90, and clerical at \$37.87.

Management person-hours and clerical person-hours are assumed to be 5 percent and 10 percent of technical person-hours, respectively.

(b) The affected 2 plants will submit the initial notification, leading to an average annual burden of 0.7 plants/yr in Year 1.

(c) The affected 2 plants will submit the notification of compliance status, leading to an average annual burden of 0.7 plants/yr in Year 1.

(d) The affected 2 plants will submit an annual compliance certification each year.

(e) Assumes that 2 facilities per year would have to submit an exceedance report per year.

N/A = Not applicable.

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

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

Attachment 2.

Information Requirements – Amendments to the Ferroalloys Production NESHAP

Requirement	Citation for Existing Sources	Citation for New Sources	General Provisions Citation
Emission standards	§§63.1623, 63.1652	§§63.1623, 63.1652	
Operational and work practice standards	§§63.1624, 63.1654	§§63.162463.1654	
Performance tests	§§63.1625, 63.1656	§§63.1625, 63.1656	§63.7
Monitoring	§§63.1626, 63.1657	§§63.1626, 63.1657	§63.8
Notification	§§63.1627, 63.1658	§§63.1627, 63.1658	§63.9
Recordkeeping and reporting	§§63.1628, 63.1659, 63.1660	§§63.1628, 63.1659, 63.1660	§63.10