

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

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

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (Renewal), EPA ICR Number 1831.06, OMB Control Number 2060-0391.

1(b) Short Characterization/Abstract

The NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese were proposed on August 4, 1998, promulgated on May 20, 1999, and amended on March 22, 2001, June 23, 2003, and April 20, 2006. On September 4, 2014, EPA proposed supplemental amendments to address particulate emissions standards covering facilities that produce ferroalloys based on the residual risk and technology reviews required under the Clean Air Act. The regulation applies to new and existing ferroalloy production facilities that manufacture ferromanganese and silicomanganese, and that are either major sources of hazardous air pollutant (HAP) 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; metal oxygen refining processes; crushing and screening operations; and fugitive dust sources. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is collected to assure compliance with 40 CFR Part 63, Subpart XXX.

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.

Over the next three years, an average of one respondent per year will be subject to the standard. No additional respondents per year will become subject to the standard. The ferromanganese and silicomanganese producer facility is publicly owned and operated by Elkem Metals Company. They will maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office. The required quarterly and semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

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

without any “Terms of Clearance.”

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 ferroalloy production 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 XXX.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensures compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standard is being

met. The performance test may also be observed.

The required quarterly and 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 XXX.

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* (79 FR 30117) on May 27, 2014. No comments were received on the burden published in the *Federal Register*.

3(c) Consultations

Industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS), which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data.

Consultations with industry representatives (i.e., respondents) also were conducted to determine if there is any way for EPA to reduce the recordkeeping and reporting burden or improve the language in the standard to make it easier to comply. In developing this ICR, we contacted Eramet Marietta, Inc. at (740) 374-1000 and Georgian American Alloys, Inc. at (305) 375-7560.

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 respondents to maintain all records, including reports and notifications, for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond 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 owners or operators of all new and existing ferroalloys production facilities that are major sources or are co-located at major sources. The United States Standard Industrial Classification (SIC) code for respondents affected by the standard is 3313 (Electrometallurgical Products, Except Steel). It corresponds to The North American Industry Classification System (NAICS) code 331112 for Electrometallurgical Ferroalloy Product Manufacturing.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (Renewal).

A source must make the following notifications:

Notifications	
Notification of applicability if an area source becomes subject to the rule	63.9 (b), 63.1658(a)
Notification of construction/reconstruction	63.5(a, b, d and e), 63.9(b), 63.1658(a)
Request for an extension of compliance status	63.9(c), 63.1658(b)
Notification that source is subject to special compliance requirements	63.9(d), 63.1658(c)
Notification of performance test	63.9(e), 63.1658(d)
Notification of opacity and visible emission observations	63.9(f), 63.1658(e)
Notification of compliance status	63.9(h), 63.1658(f)

A source must make the following reports:

Reports	
Results of initial performance tests	63.10(d)(2), 63.1659(a)(2)
Results of opacity or visible emission observations	63.10(d)(3)
Progress reports if source has received an extension for compliance	63.10(d)(4)
Immediate and periodic startup, shutdown, malfunction reports	63.10(d)(5), 63.1659(a)(4)
Continuous monitoring systems (CMS) performance evaluations reports	63.10(e)(2)
Semiannual summary reports of air pollution control device maintenance records, venture scrubbers, fugitive dust, and capture and bag leak detection systems	63.1659(b)
Quarterly excess emissions reports and CMS performance report, unless a semiannual frequency has been approved	63.10(e)(3)(i), 63.1659(b)(6)
Request to reduce frequency of reporting to semiannual	63.10(e)(3)(ii-iv)
Waiver of recordkeeping and reporting	63.10(f)

A source must keep the following records:

Recordkeeping	
Maintain records of all information necessary to demonstrate compliance with standard including the occurrence and duration of startup, shutdown, or malfunction of operations	63.10(a-c), 63.1660(a)(2)
Maintain records of process or control device parameters; manufacturer certification of monitoring device accuracy; bag leak detection system outputs, alarms, and associated implementation and corrective actions; maintenance and fugitive dust control plans; and maintenance inspections, repairs, replacements, or other corrective actions	63.1660(b)
Maintain records for five years, with the most recent two years kept on site	63.10(b)(1), 63.1660(b)(2)

Electronic Reporting

Currently, one respondent is using monitoring equipment that automatically records parameter data (e.g., pressure drop across the venturi scrubber, monitoring parameter data for the capture systems, and bag leak detection systems alarms). 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. In addition, the respondent is able to meet rule reporting requirements by transmitting data, including reports, electronically to regulatory agencies.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Monitor shop opacity through one of the monitoring options, including: 1) monitor control system fan motor amperes and capture system damper positions once per shift; 2) install, calibrate, maintain, and operate CMS for volumetric flow rate through each separately ducted hood; and 3) install, calibrate, maintain, and operate for volumetric flow rate at the inlet of the air pollution control device and capture system damper positions once per shift.
Monitor baghouse operations on a regular basis (e.g., observe on a daily basis for the presence of visible emissions at baghouses and bag leak detection system). Conduct periodic visual inspections to ensure systems are working properly.
Monitor pressure drop and liquid supply pressure across the venturi scrubber.

Respondent Activities
Perform initial performance test and repeat performance test, if necessary. Reference Method 9 for opacity observations and Method 5 for determination of particulate matter concentrations and volumetric flow rates for baghouses without stacks.
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.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

5(a) Agency Activities

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

Agency Activities
Observe initial performance tests and repeat performance tests, if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports required to be submitted by industry.
Audit facility records.

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. 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 OTIS, which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve, and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

5(c) Small Entity Flexibility

The NESHAP for ferroalloys production facilities only applies to major sources. There are no small entities (i.e., small businesses) affected by this regulation. In addition, during the rule development process, the EPA closely reviewed existing permit conditions at existing facilities, and, where feasible, incorporated similar, if not identical, requirements in the final rule. The Agency considers the final rule requirements to be the minimum needed to ensure compliance with the standard.

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 Ferroalloys Production: Ferromanganese and Silicomanganese (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.

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 600 (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	\$128.06 (\$60.98 + 110%)
Technical	\$101.05 (\$48.12 + 110%)
Clerical	\$51.37 (\$24.46 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, "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 is labor costs. There are no capital/startup or operation and maintenance (O&M) costs.

There are no capital/startup costs for this ICR since we have assumed the only source subject to this regulation has already purchased the necessary equipment to comply with the rule. In addition, we have assumed there are no O&M costs for use of continuous monitoring systems since the monitors required by the rule are typically used by the source as part of its normal operations to ensure control devices are functioning properly. We have assumed that other costs associated with photocopying and postage are negligible.

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

The only type of industry costs associated with the information collection activities in the regulation are labor costs. There are no capital/startup or O&M costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are 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 \$1,900.

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

Managerial	\$62.90 (GS-13, Step 5, \$39.31 + 60%)
Technical	\$46.67 (GS-12, Step 1, \$29.17 + 60%)
Clerical	\$25.25 (GS-6, Step 3, \$15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2014 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 Ferroalloys Production: Ferromanganese and Silicomanganese (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 one existing respondent 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 one 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 ²	(E) Number of Respondents (E=A+B+C-D)
1	0	1	0	0	1
2	0	1	0	0	1

Number of Respondents					
3	0	1	0	0	1
Average	0	1	0	0	1

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

² Column D is subtracted to avoid double-counting respondents.

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
Initial notifications	0	5	0	0
Notification of annual performance test	1	1	0	1
Notification of opacity and visible emissions observations	1	1	0	1
Report of annual performance test results/opacity observations	1	1	0	1
Semiannual reports	1	2	0	2
Quarterly reports	1	4	0	4
Annual compliance status certification	1	1	0	1
			Total	10

The number of Total Annual Responses is 10.

The total annual labor costs are \$57,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (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 below, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 600. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (Renewal). We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 60 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 41 labor hours at a cost of \$1,900. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (Renewal).

6(f) Reasons for Change in Burden

There is a slight increase of 16 hours in the total estimated respondent burden compared with the ICR currently approved by OMB. This is due to the rounding of estimates.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 60 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-2014-0066. 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-2014-0066 and OMB Control Number 2060-0391 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (Renewal)

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Acquisition, installation, and utilization of technology and systems	N/A							
4. Reporting requirements ^c								
A. Read instructions	See 5C							
B. Required activities	See 5C							
C. Create information	See 5C							
D. Gather information	See 5C							
E. Report preparation								
i. Initial notifications	N/A							
ii. Notification of reconstruction/modification	N/A							
iii. Notification of annual performance test	2	1	2	1	2	0.1	0.2	225.18
iv. Notification of opacity and visible observations	2	1	2	1	2	0.1	0.2	225.18
v. Report of performance test results/opacity observations	5	1	5	1	5	0.25	0.5	562.95
vi. Periodic startup, shutdown and malfunction reports	10	2	20	1	20	1	2	2251.8
vii. Capture hood inspection report	4	2	8	1	8	0.4	0.8	900.72
viii. Summary report of maintenance records	4	2	8	1	8	0.4	0.8	900.72
ix. Fugitive dust operations report	4	2	8	1	8	0.4	0.8	900.72
x. Quarterly excess emissions report	4	4	16	1	16	0.8	1.6	1801.44
xi. Annual compliance status	2	1	2	1	2	0.1	0.2	225.18

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
certification								
Subtotal for Reporting Requirements						82		7,994
5. Recordkeeping requirements								
A. Read instructions	See 5C							
B. Plan activities	10	1	10	1	10	0.5	1	1,125.9
C. Implement activities								
i. Control devices								
Annual Performance tests for submerged arc furnace control devices	50	1	50	1	50	2.5	5	5,629.5
Baghouse monitoring								
Daily	0.5	350	175	1	175	8.75	17.5	19,703.25
Weekly	0.1	50	5	1	5	0.25	0.5	562.95
Monthly	0.1	12	1.2	1	1.2	0.06	0.12	135.11
Quarterly	0.1	4	0.4	1	0.4	0.02	0.04	45.04
Semiannually	0.1	2	0.2	1	0.2	0.01	0.02	22.52
Parameter monitoring	0.1	1,050	105	1	105	5.25	10.5	11,821.95
ii. Monthly capture system inspection	2	12	24	1	24	1.2	2.4	2,702.16
iii. Opacity violation - scrubber	2	1	2	1	2	0.1	0.2	225.18
iv. Opacity violation - baghouse	2	20	40	1	40	2	4	4,503.6
v. Monitoring violation - capture system	2	12	24	1	24	1.2	2.4	2,702.16
D. Develop record system ^c	N/A							
E. Enter and transmit information	See 5C							
F. Personnel training	N/A							
G. Adjust existing ways to comply with previously applicable requirements	N/A							
H. Disclose information	N/A							
I. Audits	N/A							
Subtotal for Recordkeeping Requirements						502		49,179

	A	B	C	D	E	F	G	H
Burden item	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
TOTAL ANNUAL BURDEN AND COST (ROUNDED)¹						584		57,173

Assumptions:

- ^a There is only one ferroalloy production facility currently subject to the standard. No additional respondents will become subject to this regulation since industry growth is not expected in the next three years.
- ^b This ICR uses the following labor rates: \$101.05 (technical), \$128.06 (managerial), and \$51.37 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, "Table 2. Civilian workers, by occupational and industry group." The rates are from column 1, "Total compensation." They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- ^c We have assumed the existing source has complied with all initial notification and compliance demonstration requirements, since the rule's effective date has passed. In addition, we have assumed the source has already developed its record system, including the startup, shutdown and malfunction plan; the fugitive dust plan; and the control equipment/maintenance plan.
- ¹ Totals have been rounded to 3 significant values. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (Renewal)

Burden item	A	B	C	D	E	F	G	H
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) ^b
1. Report reviews ^c								
A. Initial notifications	N/A							
B. Notification of reconstruction/modification	N/A							
C. Notification of annual performance test/opacity and visible emissions observations ^d	1	1	1	1	1	0.05	0.1	52.34
D. Report of performance test results/opacity observations	5	1	5	1	5	0.25	0.5	261.7
E. Semiannual summary reports	10	2	20	1	20	1	2	1,046.8
F. Quarterly excess emissions report	2	4	8	1	8	0.4	0.8	418.72
G. Annual compliance status certification	2	1	2	1	2	0.1	0.2	104.68
TOTAL ANNUAL BURDEN AND COST (ROUNDED)¹						41		1,884

Assumptions:

^a There is only one ferroalloy production facility currently subject to the standard. No additional respondents will become subject to this regulation since industry growth is not expected in the next three years.

^b This ICR uses the following labor rates: \$46.67 (technical), \$62.90 (managerial), and \$25.25 (clerical). These rates are from the Office of Personnel Management (OPM), 2014 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.

^c We have assumed the existing source has complied with all initial notification and compliance demonstration requirements, since the rule's effective date has passed. In addition, we have assumed the source has already developed its record system, including the startup, shutdown and malfunction plan; the fugitive dust plan; and the control equipment/maintenance plan.

^d Notifications for performance testing and opacity and visible emissions observations are submitted concurrently for EPA review.

¹ Totals have been rounded to 3 significant values. Figures may not add exactly due to rounding.

