

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Renewal), EPA ICR Number 1995.06, OMB Control Number 2060-0521.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Oven Pushing, Quenching, and Battery Stacks were proposed on July 3, 2001, promulgated on April 14, 2003, and amended on August 2, 2005. These regulations apply to existing and new coke plants that are major sources of hazardous air pollutant (HAP) emissions. The NESHAP applies to emissions from pushing, soaking, quenching, and battery stacks on both new and existing coke oven batteries. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart CCCCC.

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

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

The burden to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Renewal). The “Federal Government” burden is attributed entirely to work performed by federal employees or government contractors and may be found in Table 2: Average Annual EPA Burden and Cost – NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Renewal).

Based on our consultations with industry representatives, there is an average of 2.8 battery stacks per plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 17 respondents per year (operating 53 by-product batteries and 10 non-recovery batteries) are subject to the standard. We estimate no additional respondents per year will become subject to the standard.

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 coke plants 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 CCCCC.

2(b) Practical Utility/Users of the Data

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

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test a record of the

operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

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

The required 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 CCCCC.

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

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to

comment on the burden associated with the standard as it was being developed. In developing this ICR, we contacted both the American Coke and Coal Chemicals Institute, at (202) 452-7198, and the Association for Iron & Steel Technology, at (724) 814-3062.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice.

3(d) Effects of Less Frequent Collection

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

3(e) General Guidelines

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

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five year records retention requirement is consistent 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 and operators of coke plants. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed below.

Standard (40 CFR Part 63, Subpart CCCCC)	SIC Codes	NAICS Codes
Iron and Steel Mills	3312	331111
All Other Petroleum and Coal Products Manufacturing	3312	324199

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC).

A source must make the following reports:

Notifications	
Initial notification requirements	63.9(b), 63.7340(a)
Notification of opacity or visible emission observations (submitted concurrently with performance test)	63.6(h)(4 and 5), 63.9(f), 63.7340(a)
Notification of compliance status when a source becomes subject to the standard	63.9(h), 63.7340(e)
Notification that source is subject to special compliance requirements, if applicable	63.9(d)
Notification of performance test ¹	63.7(b and c), 63.9(e), 63.7340(d)
Rescheduled of performance test	63.7(b)(2)
Demonstration of continuous monitoring system	63.8(e), 63.9(g), 63.7340(f)
Change in information already provided	63.9(j)
Request for an extension of compliance with relevant standard	63.9(c)
Request to use an alternative monitoring procedure	63.8(f)(4)

Reports	
Application for approval of the construction or reconstruction of a new major affected source, or reconstruction of a major affected source	63.5(d)
Performance test results	63.10(d)(2 and 3)
Startup, shutdown and malfunction plan	63.6(e)(3), 63.7310(c)
Operation and maintenance plan for capture systems, control devices applied to pushing emissions, and by-product coke oven batteries	63.7300(b and c)
Immediate startup, shutdown and malfunction reports	63.7341(d), 63.10(d)(5)
Plan for soaking emissions	63.7294
Plan to prevent green pushes from by-product coke oven batteries with horizontal flues	63.7292
Progress reports for compliance extension (if applicable)	63.6(i)1
Quarterly and semiannual compliance reports	63.7341(b-c)

A source must keep the following records:

Recordkeeping	
Startup, shutdown and malfunction plan	63.6(e)(3), 63.7342(a)(2)
All reports and notifications	63.10(b)(1), 63.7342(a)(1)
Records of startup, shutdown, and malfunction of process equipment	63.10(b)(2)(i and iv), 63.7342(a)(2)
Records of malfunctions of air pollution control equipment	63.10(b)(2)(ii), 63.7342(a)(4)
Records of visual observations	63.7342(c)
Records demonstrating continuous compliance with applicable emission limitations, work practice standards, and operation and maintenance requirements	63.7342(d)
Any applicability determination that demonstrates why owner or operator believes source is unaffected	63.10(b)(3)
Records of maintenance of air pollution control equipment	63.10(b)(2)(iii)
Records of performance tests, performance evaluations, and opacity	63.10(b)(2)(viii),

Recordkeeping	
and visible emissions observations	63.7342(a)(3)
Five-year retention of records	63.10(b)(1), 63.7343(b)1

Electronic Reporting

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

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Method 1; 2, 2F, or 2G; 3, 3A, or 3B; 4; 5 or 5D tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

5(a) Agency Activities

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

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in Enforcement and Compliance History Online (ECHO) and ICIS.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

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

5(c) Small Entity Flexibility

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

entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Renewal).

6. Estimating the Burden and Cost of the Collection

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

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

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 24,400 (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	\$129.93 (\$61.87+ 110%)
Technical	\$103.97 (\$49.51 + 110%)
Clerical	\$51.79 (\$24.66 + 110%)

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

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Leak detectors	\$9,000	0	\$0	\$500	17	\$8,500
Continuous Opacity Monitors	\$37,000	0	\$0	\$8,421	17	\$143,157
Total ¹			\$0			\$152,000

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

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$152,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$152,000.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$8,880.

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), 2015 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 Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (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 17 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 17 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	17	0	0	17
2	0	17	0	0	17
3	0	17	0	0	17
Average	0	17	0	0	17

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

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 17.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of compliance status	0	1	0	0
Notification/application of construction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test and test plan	0	1	0	0
Report of performance test results	6.4	1	0	6.4
Report of semiannual compliance reports	17	2	0	34
Report of quarterly compliance reports	15	4	0	60
Report of startup, shutdown, malfunction	1	1	0	1
			Total ¹	101

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

The number of Total Annual Responses is 101.

The total annual labor costs are \$2,450,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

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

(i) Respondent Tally

The total annual labor hours are 24,400. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Renewal).

We assume that burdens for managerial tasks take 5 percent 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 percent 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 242 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$152,000. 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 195 labor hours at a cost of \$8,880. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Renewal).

We assume that burdens for managerial tasks take 5 percent 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 percent of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

6(f) Reasons for Change in Burden

There is an overall decrease in the respondent and Agency burden, including a decrease in labor hours, labor cost, O&M cost, and estimated number of responses. The decrease from the previous ICR occurred because two U.S. Steel facilities have closed in the past three years. These two facilities operated 5 by-product batteries. The facility closure information was obtained through EPA Office of Air Quality Planning and Standard, trade associations, and facility representatives.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 242 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-2014-0084. 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-2014-0084 and OMB Control Number 2060-0521 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 Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	40	1	40	0	0	0	0	\$0
4. Reporting Requirements								
A. Familiarize with rule requirement	2	1	2	17	34	1.7	3.4	\$3,932
B. Required activities ^{c, d}								
Method 5 performance test ^{e, c}	40	1.5	60	6.4	384	19.2	38.4	\$44,407.87
Startup, shutdown, malfunction plan	40	1	40	0	0	0	0	\$0
Operation and maintenance plans for by-product coke oven batteries and capture systems and control devices applied to pushing emissions	40	1	40	0	0	0	0	\$0
Work practice plan for batteries with horizontal flues (one plant)	40	1	40	1	40	2	4	\$4,625.82
Method 9 daily observations for fugitive pushing emissions ^f	2.8	365	1,022	15	15,330	766.5	1,533.0	\$1,772,845.52
Weekly sampling for total dissolved solids (TSD) ^g	2.3	52	119.6	17	2,033.2	101.66	203.32	\$235,130.43
Monthly inspections and maintenance of affected sources, control devices, and continuous parameter monitoring systems ^e	2	12	24	17	408	20.4	40.8	\$47,183.36
C. Create information	See 4B							

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (Cx D)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
D. Gather existing information	See 4B							
E. Write report								
Notification of applicability	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of special compliance Requirements	2	1	2	0	0	0	0	\$0
Compliance extension request	2	1	2	0	0	0	0	\$0
Notification of performance test ^c	2	1.5	3	0	0	0	0	\$0
Site-specific test plan	40	1	40	0	0	0	0	\$0
Notification of compliance status	8	1	8	0	0	0	0	\$0
NESHAP waiver application	N/A							
Report of performance test ^h	See 4B							
Semiannual compliance reports ^h	40	2	80	17	1,360	68	136	\$157,277.88
Quarterly compliance reports for battery stacks ^f	12	4	48	15	720	36	72	\$83,264.76
Emergency startup, shutdown, or malfunction reports ⁱ	4	1	4	1	4	0.2	0.4	\$462.58
Subtotal for Reporting Requirements						23,360		\$2,349,130.17
5. Recordkeeping Requirements								
A. Familiarize with rule requirement	See 4A							
B. Plan activities	3	1	3	0	0	0	0	\$0

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (Cx D)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
C. Implement activities	12	1	12	0	0	0	0	\$0
D. Develop record system	3	1	3	0	0	0	0	\$0
E. Time to enter information	1	52	52	17	884	44.2	88.4	\$102,230.62
F. Time to train personnel	3	1	3	0	0	0	0	\$0
G. Time to adjust existing ways to comply with previously applicable requirements	3	1	3	0	0	0	0	\$0
H. Time to transmit or disclose information ^j	0.25	2	0.5	17	8.5	0.425	0.85	\$982.99
I. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					1,026			\$103,213.61
TOTAL LABOR BURDEN AND COST (rounded) ^k					24,400			\$2,450,000
Capital and O&M Cost (see Section 6(b)(iii)): ^k								\$152,000
TOTAL COST: ^k								\$2,600,000

Assumptions:

^a There is an average of 17 respondents (i.e., coke plants operating 53 by-product batteries and 10 non-recovery batteries). We have assumed that there will be no new sources subject to this regulation.

^b This ICR uses the following labor rates: \$129.93 per hour for Executive, Administrative, and Managerial labor; \$103.97 per hour for Technical labor, and \$51.79 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 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.

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

^d Monitoring and recordkeeping of operations for respondents include: monthly inspection of capture and control systems; daily Method 9 observations; weekly

sampling for dissolved solids for quenching operations; work practices for batteries with horizontal flues (one plant); and Method 5 testing for particulate matter.

^e The rule requires that every 2.5 years (or 0.4 times per year over the 3 years of the ICR), each control device applied to pushing emissions must be sampled by Method 5 for particulate matter. From past analysis, we have determined that there is an average of 1.5 emission points per respondent that need to be tested. There is an average of 6.4 respondents per year (16×0.4) submitting Method 5 performance test reports.

^f Daily Method 9 observations of 4 pushes per battery stacks one hour per day per battery. We have assumed that 15 of the plants will have burden that can be attributed to the rule (since the other plants were doing this type of monitoring before the rule). There is an average of 2.8 battery stacks per plant required to be tested for Method 9 for the burden calculation although we know that a few plants have a pair of batteries served by one stack.

^g The measuring of the total dissolved solids (TDS) in the make-up water used for quenching is a requirement. In past analysis, we determined there is an average of 2.3 quenching towers per facility.

^h The rule requires the submittal of quarterly compliance reports for all battery stacks. If no deviation occurred and no continuous monitoring systems were out of control, only a summary report is required. For other affected sources, semiannual reports are required for any deviation from an emission limitation (including an operating limit), work practice standard, or O&M requirement.

ⁱ It assumes that one respondent per year will have a startup, shutdown and malfunction (SSM) occurrence that is not managed according to the SSM plan.

^j It assumes 15 minutes to transmit recorded information

^k 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 Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per plant per year	(C) Hours per plant per year (AxB)	(D) Plants per year ^a	(E) Technical person-hours per year (Cx D)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
Initial performance test	40	1	40	0	0	0	0	\$0
Repeat performance test-Retesting preparation	2	1	2	0	0	0	0	\$0
Repeat performance- Retesting	40	1	40	0	0	0	0	\$0
Report Review								
Notification of construction/reconstruction	N/A							
Notification of anticipated startup	N/A							
Notification of actual startup	N/A							
Notification of special compliance requirements	N/A							
Notification of initial performance test	2	1	2	0	0	0	0	\$0
Notification of compliance status ^d	2	1	2	0	0	0	0	\$0
Review of repeat Method 5 performance test report ^d	8	1	8	6.4	51.2	2.56	5.12	\$2,679.81
Review of semi-annual compliance report ^e	8	0.4	3.2	17	54.4	2.72	5.44	\$2,847.30
Review of NESHAP waiver application	2	1	2	0	0	0	0	\$0.00
Review of quarterly compliance report for battery stacks ^f	4	1	4	15	60	3	6	\$3,140.40
Review of emergency startup, shutdown, and malfunction report ^g	4	1	4	1	4	0.2	0.4	\$209.36
TOTAL ANNUAL COST ^h						195		\$8,880

Assumptions:

^a There is an average of 17 respondents (i.e., coke plants operating 53 by-product batteries and 10 non-recovery batteries). We have assumed that there will be no new sources subject to this regulation.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$62.90 (GS-13, Step 5, \$39.31 + 60%), Technical rate of \$46.67 (GS-12, Step 1, \$29.17 + 60%), and Clerical rate of \$25.25 (GS-6, Step 3, \$15.78 + 60%). These rates are from the Office of Personnel Management (OPM) “2015 General Schedule” which excludes locality rates of pay.

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

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

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

^f The rules requires the submittal of quarterly compliance reports for battery stacks.

^g It assumes that one respondent will have a startup, shutdown and malfunction (SSM) occurrence that is not managed according to the SSM plan.

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