

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting Requirements			
A. Familiarize with rule requirements	2	1	2
B. Required activities <sup>c, d</sup>			
i. Method 5 performance test <sup>e</sup>	40	7.6	304
ii. Method 9 performance test <sup>e</sup>	8	3.6	28.8
iii. Method 6071B performance test	2	365	730
iv. Startup, shutdown, malfunction plan	40	1	40
v. Inspection and maintenance of capture systems and control devices	2	12	24
C. Gather existing information	See 4D, 4E		
D. Write report <sup>c, d</sup>			
i. Notification of applicability	2	1	2
ii. Notification of compliance status	2	1	2
iii. Notification of intent to construct a major source and review application	4	1	4
iv. Notification of initial construction/reconstruction	4	1	4
v. Notification of actual startup	4	1	4
vi. Notification of performance test	4	1	4
vii. Reports of performance test results	See 3B, 4E		
viii. Semiannual compliance reports <sup>c</sup>	40	2	80
ix. Startup, shutdown, malfunction report <sup>f</sup>	4	1	4
<b>Subtotal for Reporting Requirements</b>			
4. Recordkeeping Requirements			
A. Familiarize with rule requirements	See 3A		
B. Plan activities	10	1	10
C. Implement activities	See 3B		
D. Develop record system	N/A		
E. Time to enter and transmit information <sup>g</sup>	3.25	52	169
F. Time to train personnel	3	1	3
G. Time for audits	N/A		
<b>Subtotal for Recordkeeping Requirements</b>			
<b>TOTAL LABOR BURDEN AND COST (rounded<sup>†</sup>)</b>			
Capital and O&M Cost <sup>†</sup>			
<b>GRAND TOTAL <sup>†</sup></b>			

**Assumptions:**

- <sup>a</sup> We have assumed that there are approximately 18 existing sources currently subject to this rule. There will be no additional 1
- <sup>b</sup> This ICR uses the following labor rates: \$129.93 per hour for Executive, Administrative, and Managerial labor; \$103.97 per from the United States Department of Labor, Bureau of Labor Statistics, June 2014 “Table 2: Civilian Workers, by occupation; The rates have been increased by 110 percent to account for the benefit packages available to those employed by private indust
- <sup>c</sup> We have assumed that existing sources have already complied with initial rule requirements and are in full compliance with j have to comply with the initial rule requirements including notifications and performance tests for add-on control devices.
- <sup>d</sup> Monitoring and recordkeeping of operations for respondents will include monthly inspection of capture and control systems; of three samples taken at 8-hour intervals]) to compute the 30-day rolling average oil content for each operating day; and every matter and Method 9 for opacity observations to determine the opacity of fugitive emissions
- <sup>e</sup> Based on the average for the 18 respondents, we have assumed that there is an average of 7.6 emission points per respondent to need to be sampled using Method 9.
- <sup>f</sup> We have assumed that one respondent per year will have at least one startup, shutdown, or malfunction (SSM) that is not ma
- <sup>g</sup> We have assumed that it takes each respondent approximately 3.25 hours per week to record and transmit information.
- <sup>†</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

103.97      129.93      51.79

(D)	(E)	(F)	(G)	(H)
Respondents per year <sup>a</sup>	Technical person- hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Cost Per year <sup>b</sup>
18	36	1.8	3.6	\$4,163
18	5,472	273.6	547.2	\$632,812.18
18	518.4	25.92	51.84	\$59,950.63
7	5,110	255.5	511	\$590,948.51
0	0	0	0	\$0
18	432	21.6	43.2	\$49,958.86
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0			\$0
0	0	0	0	\$0
0	0	0	0	\$0
18	1,440	72	144	\$166,529.52
1	4	0.2	0.4	\$462.58
	<b>14,964</b>			<b>\$1,504,826</b>
0	0	0	0	\$0
18	3,042	152.1	304.2	\$351,793.61
0	0	0	0	\$0
	<b>3,498</b>			<b>\$351,794</b>
	<b>18,500</b>			<b>\$1,860,000</b>
				\$67,000
				<b>\$1,930,000</b>

420  
hr/resp

new source that will become subject to the rule each year over the three-year period of this ICR.

hour for Technical labor, and \$51.79 per hour for Clerical labor. These rates are al and industry group.” The rates are from column 1, “Total Compensation.” ry.

periodic requirements including semiannual reports. New respondents would

daily testing of oil content for the sinter plant feed (7 plants [from the composite r 2.5 years, each emission point must be sample by Method 5 for particulate

that need to be sampled using Method 5 and 3.6 emission points per respondent

naged according to the SSM plan.

**Table 2: Average Annual EPA Burden and Cost – Average Annual EPA Burden and Cost – NI**

Activity	(A)	(B)	(C)	(D)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>
New Respondents <sup>c</sup>				
i. Notification of compliance status	4	1	4	0
ii. Notification of intent to construct a major source and review application	4	1	4	0
iii. Notification of start of construction	2	1	2	0
iv. Notification of actual startup	2	1	2	0
v. Notification of initial performance test and test plan	4	1	4	0
Existing Respondents				
i. Performance test report for Method 5 and Method 9 <sup>d</sup>	20	0.4	8	18
ii. Review semiannual compliance reports <sup>e</sup>	8	2	16	18
iii. Review of startup, shutdown, malfunction reports <sup>e</sup>	4	1	4	1
Subtotals Labor Burden and cost				
<b>TOTAL ANNUAL BURDEN AND COST (rounded†)</b>				

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 18 existing sources currently subject to this rule. There will be no additions during the three-year period of this ICR.

<sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government contributions (x 1.6), \$46.67 for Technical (GS-12, Step 1, \$29.17 x 1.6) and \$25.25 Clerical (GS-6, Step 3, \$15.78 x 1.6). These rates are based on the 2013 Schedule, which excludes locality rates of pay.

<sup>c</sup> We have assumed that existing sources have to comply with the initial rule requirements. New respondents are required to submit initial notifications and prepare startup, shutdown and malfunction (SSM) plans.

<sup>d</sup> Every 2.5 years (or about 0.4 times per year, if averaged over the three-year period of ICR), respondents must sample each source for opacity observations, and submit a report with results.

<sup>e</sup> Sources are required to submit semiannual compliance reports and startup, shutdown, and malfunction (SSM) reports if they have an SSM plan.

<sup>†</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**ESHAP for Integrated Iron and Steel Manufacturing (40 CFR Part 63, Subpart FFFFF) (Renewable Energy)**

46.67                      62.9                      25.25

(E)	(F)	(G)	(H)
Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ <sup>b</sup>
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
144	7.2	14.4	\$7,536.96
288	14.4	28.8	\$15,073.92
4	0.2	0.4	\$209.36
501			\$22,820
<b>501</b>			<b>\$22,800</b>

tional new source that will become subject to the rule each year over

nt overhead expenses: \$62.90 for Managerial (GS-13, Step 5, \$39.31 are from the Office of Personnel Management (OPM), 2014 General

d to conduct performance test for add-on control equipments, submit

ch emission point using Method 5 for particulate matter and Method

there is an occurrence that is not managed according to the SSM

wal)

(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M
Leak detectors	\$9,000	0	0	\$2,389	18
Continuous opacity monitors	\$37,000	0	0	\$8,000	3
<b>TOTAL</b>					



(G)
Total O&M,
\$43,002
\$24,000
<b>\$67,000</b>