

REPORTING/RECORDKEEPING REQUIREMENT	(A)	(B)	(C)
	Respondent Hours per Occurrence	Number of Occurrences per Respondent per Year	Hours per Respondent per Year (A x B)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting Requirements			
A. Read and understand rule requirements	1	1	1
B. Required activities			
Initial Performance tests <sup>c</sup>	364	1	364
Repeat Performance tests <sup>c</sup>	364	0.2	72.8
Monitoring of operations and emissions <sup>d, e</sup>			-----
D. Gather Existing Information			-----
E. Write report			
Notification of construction/modification	2	1	2
Notification of actual startup	2	1	2
Notification of initial performance test	2	1	2
Reports of performance test results			-----
Semiannual reports <sup>f</sup>	16	2	32
<b>Subtotal for Reporting Requirements</b>			
4. Recording Requirements			
A. Read and understand rule requirements			-----
B. Plan activities			-----
C. Implement activities			-----
D. Develop record system	N/A		
E. Time to enter and transmit information:			
Records of daily monitoring of operations <sup>d</sup>	0.75	350	262.5
Records of daily emissions monitoring by a certified observer <sup>e, h</sup>	0.5	350	175
Records of COMS <sup>g, i</sup>	0.5	350	175
Records of BLDS <sup>h, i</sup>	0.5	350	175
Records of static furnace <sup>h</sup>	0.5	350	175
F. Time to train personnel	N/A		
G. Time for audits	N/A		
<b>Subtotal for Recordkeeping Requirements</b>			
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>j</sup></b>			
<b>Total Capital/O&amp;M Costs (rounded)<sup>j</sup></b>			
<b>Grand Total (Labor and Capital/O&amp;M Costs)(rounded)<sup>j</sup></b>			

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 99.3 sources currently subject to the NSPS, subparts AA and AAa. Over a three year period of this ICR (0.3 new respondents per year). Therefore, the average number of respondents per year is 99.6.

<sup>b</sup> This ICR uses the following labor rates: Technical \$103.97 (\$49.51 + 110%); Managerial \$129.93 (\$61.87+ 110%); and Professional \$155.93 (\$74.06+ 110%). Source: Bureau of Labor Statistics, June 2014, "Table 2. Civilian Workers, by occupational and industry group." The rate is adjusted to account for the benefit packages available to those employed by private industry. This ICR assumes that Managerial and Professional hours are 1.5 times the rate of Technical hours.



103.97                      129.93                      51.79

(D)	(E)	(F)	(G)	(H)
Number of Respondents per Year <sup>a</sup>	Technical Hours per Year (C x D)	Management Hours per Year (E x 0.05)	Clerical Hours per Year (Ex0.1)	Total Labor Costs per Year, \$ <sup>b</sup>
99.6	99.6	4.98	9.96	\$11,518.29
0.3	109.2	5.46	10.92	\$12,628.49
0.3	21.84	1.09	2.18	\$2,525.70
-----See 4E-----				
See 3B and 4E-----				
0.3	0.6	0.03	0.06	\$69.39
0.3	0.6	0.03	0.06	\$69.39
0.3	0.6	0.03	0.06	\$69.39
-----See 3B-----				
99.6	3187.2	159.36	318.72	\$368,585.34
		<b>3,933</b>		<b>\$395,466</b>
-----See 3A-----				
-----See 3B-----				
-----See 3B-----				
99.6	26145	1307.25	2614.5	\$3,023,551.60
48.11	8419.25	420.96	841.93	\$973,648.38
26.29	4600.75	230.04	460.08	\$532,056.03
13.15	2301.25	115.06	230.13	\$266,129.21
51.49	9010.75	450.54	901.08	\$1,042,052.69
		<b>58,049</b>		<b>\$5,837,438</b>
		<b>62,000</b>		<b>\$6,230,000</b>
				<b>\$203,000</b>
				<b>\$6,430,000</b>

We have further assumed that one minimill will become subject to the standard over the estimated to be 99.6 (rounded).

and Clerical \$51.79 (\$24.66 + 110%). These rates are from the United States Department of Labor and are from column 1, "Total compensation." The rates have been increased by 110 percent. Management hours are 5 percent of Technical hours, and Clerical hours are 10 percent of

nce test and notification requirements. We have assumed that 20 percent of the sources

ta and pressure data. In addition, sources are required to conduct monthly operational status

; an EAF equipped with a direct shell evacuation system (DEC) and uses a negative  
issions monitoring using a furnace static pressure monitoring device or by electing to  
a DEC.

pressure, fan motor amperes) that exceed or are below (i.e, flow rates) those established

ise, and therefore, will not be required to install a continuous opacity monitor (COMS).

with the fugitive emissions monitoring requirements by measuring the furnace static pressure  
; by a certified visible emission observer couple with the use of bag leak detection systems

it (26.29) use COMS to measure stack emissions and 33 percent (13.15) have elected to use

hr/response



**Table 2: Average Annual EPA Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Ar**

REPORTING/RECORDKEEPING REQUIREMENT	(A)	(B)	(C)	(D)
	EPA Hours per Occurrence	Number of Occurrences per Plant Per Year	EPA Hours per Year (AxB)	Plants per Year <sup>a</sup>
Notification of construction/modification	2	1	2	0.3
Notification of actual startup	1	1	1	0.3
Notification of performance test <sup>c</sup>	0.5	1.2	0.6	0.3
Initial performance test	24	1	24	0.3
Repeat Performance test <sup>c</sup>	24	0.2	4.8	0.3
Review Performance Test results <sup>c</sup>	8	1.2	9.6	0.3
Notification of COMS Demonstration	0.5	1	0.5	0.3
Semiannual reports	8	2	16	99.6
<b>TOTAL ANNUAL BURDEN and COST (rounded)<sup>d</sup></b>				

Assumptions

<sup>a</sup> We have assumed that there are approximately 99.3 sources currently subject to the NSPS, Subparts AA and / subject to the standard over the three year period of this ICR (0.3 new respondents per year). Therefore, the ave (rounded).

This cost is based on the average hourly labor rate as follows: Technical \$19.07 (GS-12, Step 1, \$20.17 + 5%), Clerical \$25.25 (GS-6, Step 3, \$15.78 + 60%). This ICR assumes that Managerial hours are 5 percent of Techn hours. These rates are from the OPM, 2012 General Schedule, which excludes locality rates of pay. The rates l

<sup>c</sup> We have assumed that 20 percent of the sources would repeat performance tests due to failure.

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

**Iron Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal)**

46.67                  62.9                  25.25

(E)	(F)	(G)	(H)
Technical Hours per Year (Cx0.1)	Management Hours per Year (Ex0.05)	Clerical Hours per Year (Ex0.1)	Costs per Year, \$ <sup>b</sup>
0.6	0.03	0.06	\$31.40
0.3	0.02	0.03	\$15.70
0.18	0.01	0.02	\$9.42
7.2	0.36	0.72	\$376.85
1.44	0.07	0.14	\$75.37
2.88	0.14	0.29	\$150.74
0.15	0.01	0.02	\$7.85
1593.6	79.68	159.36	\$83,409.02
<b>1,850</b>			<b>\$84,100</b>

AAa. We have further assumed that one minimill will become range number of respondents per year is estimated to be 99.6

Management hours (0.15, step 5), \$31.40 (0.06), and Clerical hours, and Clerical hours are 10 percent of Technical hours, and Clerical hours are 10 percent of Technical hours have been increased by 60 percent to account for the benefit