

**Table 1: Annual Respondent Burden and Cost - NESHAP for Taconite Iron Ore Processing (40 CFR Part**

<b>Burden Item</b>	<b>(A) Respondent Hours per Occurrence</b>	<b>(B) Number of Occurrences per Respondent per Year</b>	<b>(C) Hours per Respondent per Year (C=AxB)</b>
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting Requirements			
A. Familiarize with regulatory requirements <sup>c</sup>	2	1	2
B. Required activities			
Performance test – facility labor <sup>e</sup>	40	1	40
Startup , shutdown, and malfunction plan	40	1	40
C. Create information	See 4B		
D. Gather existing information	See 4B		
E. Write reports			
Initial notification <sup>d</sup>	2	1	2
Compliance extension request <sup>d</sup>	2	1	2
Site-specific test plan <sup>f</sup>	40	1	40
Operation and maintenance plan <sup>d, g</sup>	40	1	40
Fugitive dust emission control plan <sup>d, h</sup>	20	1	20
Site-specific monitoring plan <sup>d, i</sup>	80	1	80
Semiannual compliance reports	8	2	16
Petition for alternative monitoring requirements	40	1	40
Notification of performance test <sup>j</sup>	4	3	12
<b>Subtotal for Reporting Requirements</b>			
4. Recordkeeping requirements			
A. Familiarize with regulatory requirements <sup>c</sup>	See 3A		
B. Plan activities	3	1	3
C. Develop record system	16	1	16
D. Time to train personnel	3	1	3
E. Time to transmit or disclose information	1	2	2
F. Time for audits	N/A		
<b>Subtotal for Recordkeeping Requirements</b>			
<b>Total Labor Burden and Cost (rounded) <sup>k</sup></b>			
<b>Total Capital and O&amp;M Costs (rounded) <sup>k</sup></b>			
<b>Grand Total (rounded) <sup>k</sup></b>			

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondent that will be subject to the rule will be the eight existing :
- <sup>b</sup> This ICR uses the following labor rates: Technical \$103.97 (\$49.51 + 110%); Managerial \$129.93 (\$61.87+ 110%
- <sup>c</sup> This ICR assumes all respondents will have to familiarize with the regulatory requirements each year.
- <sup>d</sup> This is a one-time activity.

- <sup>e</sup> We have assumed that it will take 40 hours for each facility to complete performance test, and that performance test
- <sup>f</sup> We have assumed that 20 percent of all sources will send in a site-specific test plan.
- <sup>g</sup> We have assumed that each respondent will take 40 hours to write the operation and maintenance plan.
- <sup>h</sup> We have assumed that each respondent will take 20 hours to write the fugitive dust emission control plan.
- <sup>i</sup> We have assumed that each respondent will take 80 hours to complete the site-specific monitoring plan report.
- <sup>j</sup> We have assumed that each respondent will take 4 hours to complete the notification of performance test report.
- <sup>k</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**63, Subpart RRRRR) (Renewal)**

103.97                      129.93                      51.79

(D) Number of Respondents per Year <sup>a</sup>	(E) Technical Hours per Year (E=CxD)	(F) Management Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Total Labor Costs per Year <sup>b</sup>
4	8	0.4	0.8	\$925.16
1.6	64	3.2	6.4	\$7,401.31
1.6	64	3.2	6.4	\$7,401.31
0	0	0	0	\$0
0	0	0	0	\$0
0.32	12.8	0.64	1.28	\$1,480.26
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
4	64	3.2	6.4	\$7,401.31
0	0	0	0	\$0
1.6	19.2	0.96	1.92	\$2,220.39
	<b>267</b>			<b>\$26,830</b>
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
4	8	0.4	0.8	\$925.16
	<b>9</b>			<b>\$925</b>
	<b>276</b>			<b>\$27,800</b>
				<b>\$298,000</b>
				<b>\$326,000</b>

21  
hr/response

respondents. There will be no additional new sources per year that will become subject to the rule over the three-year period; and Clerical \$51.79 (\$24.66 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics.

ests are repeated every two of five years. Therefore, an average of 1.6 facilities per year will complete performance t

ar period of this ICR.

abor Statistics, June 2014, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column :

ests (2 performance test/5 years\*4 facilities).

1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to t

hose employed by private industry. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Cleri



cal hours are 10 percent of Technical hours.

**Table 2: Average Annual EPA Burden and Cost - NESHAP for Taconite Iron Ore Processing (40 CFR Part 6**

46.67

Burden Item	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Plant per Year (C=AxB)	(D) Plants per Year <sup>a</sup>	(E) Technical Hours per Year (E=CxD)
Initial performance tests <sup>c,d</sup>	8	7	56	0	0
Report Review					
Initial notification <sup>c</sup>	2	1	2	0	0
Notification of initial performance test <sup>c</sup>	2	3	6	0	0
Fugitive dust emissions control plan <sup>e</sup>	10	1	10	0	0
Compliance extension request	2	1	2	0	0
Site-specific test plan <sup>f</sup>	10	1	10	0.32	3.2
Operation and maintenance plan <sup>c,f</sup>	10	1	10	0	0
Site-specific monitoring plan <sup>c,f</sup>	10	1	10	0	0
Petition for alternative monitoring requirements	5	1	5	0	0
Review of semiannual compliance report	4	2	8	4	32
Review of startup, shutdown, and malfunction plan <sup>g</sup>	10	1	10	1.6	16
<b>Total Labor Burden and Cost (rounded)<sup>h</sup></b>					

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be the eight existing respondents.
- <sup>b</sup> This cost is based on the average hourly labor rate as follows: Technical \$46.67 (GS-12, Step 1, \$29.17 + 60%); Management \$58.33 (GS-13, Step 1, \$36.67 + 60%).
- <sup>c</sup> This is a one-time only activity.
- <sup>d</sup> This is based on 28 Method 5 PM tests + 58 OCH and PH Method 5 PM tests for a total of 85 Method 5 PM tests for three years. 85 tests / 3 years = 28 Method 5 PM tests per year.
- <sup>e</sup> We have assumed that each of the fugitive dust emissions control plan will be unchanged.
- <sup>f</sup> We have assumed that it will take each respondent 10 hours to review the plan.
- <sup>g</sup> We have assumed that 40 percent of respondents will submit startup, shutdown, and malfunction plan/reports.
- <sup>h</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

3, Subpart RRRRR) (Renewal)

62.9 25.25

(F) Management Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Costs per Year (\$) <sup>b</sup>
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0.16	0.32	\$167.49
0	0	\$0
0	0	\$0
0	0	\$0
1.6	3.2	\$1,674.88
0.8	1.6	\$837.44
<b>59</b>		<b>\$2,680</b>

respondents. There will be no additional new sources per year that will become subject to the rule over the three-year period of managerial \$62.90 (GS-13, Step 5, \$39.31 + 60%); and Clerical \$25.25 (GS-6, Step 3, \$15.78 + 60%). This ICR assumes that

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Method 5 PM tests/year. (28 Method 5

of this ICR.

: Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates ar

e from the OPM, 2014 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 perc

ent to account for the benefit packages available to government employees.