

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities  
(40 CFR Part 63, Subpart YYYYYY) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal), EPA ICR Number 2277.05, OMB Control Number 2060-0608.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) were proposed on September 20, 2007, and promulgated on December 28, 2007. These regulations apply to existing and new Electric Arc Furnace (EAF) steelmaking facilities that are area sources of hazardous air pollutants (HAP) emissions. The standards establish particulate matter (PM) emission limits for control devices and opacity limits for melt shops, pollution prevention requirements for ferrous scrap that is melted in EAFs, and monitoring, reporting, and recordkeeping requirements. 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 YYYYYY.

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 containing these documents, and retain the file for at least five years following the generation date of such 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 U.S. Environmental Protection Agency (EPA) regional office.

There are approximately 91 EAF facilities, which are owned and operated by the iron and steel mill industry (aka: the “Affected Public”). None of the facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. The burden to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal). The Federal Government’s “burden” is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and

Cost – NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal). We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there is an average of one affected facility at each 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 91 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. We developed the estimate by consulting with internal Agency experts at OAQPS, and the source list has been reviewed and updated by the industry trade associations identified in Section 3(c).

The active (previous) ICR had the following Terms of Clearance (TOC):

In accordance with 5 CFR 1320, the information collection is approved for three years. In future collections, costs and time burden estimates should be rounded to the appropriate number of significant digits. If “reading instructions” are provided as potential time or cost burdens, then the location of the instructions or the instructions themselves should be provided. Also, the burden for refreshing on instructions should be included, as appropriate. Any detailed tables should be provided in excel format along with or in lieu of detailed tables provided within the supporting statement.

EPA has addressed each item of concern in the TOC by rounding all calculations to three significant digits, clarifying the burden with “reading instructions” is for regulated entity to read and understand the rule, and assuming all existing sources need to re-familiarize with the rule each year. EPA has also prepared a calculation spreadsheet that accompanies this supporting statement.

## **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 EAF steelmaking facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart YYYYYY.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in these standards 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 these emission standards. Continuous emission monitors are used to ensure compliance with these same standards 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 these standards 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 semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

### **3. Non-duplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart YYYYYY.

#### **3(a) Non-duplication**

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, duplication does not exist.

### **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 (82 FR 29552) on June 29, 2017. 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. Approximately 91 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Steel Manufacturers Association (SMA), at (202) 296-1515, and the American Iron and Steel Institute, at (202) 452-7180.

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. In this case, no comments were received.

### **3(d) Effects of Less-Frequent Collection**

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these 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 (CBI) (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 these standards 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 EAF steelmaking facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3312, which corresponds to the North American Industry Classification System (NAICS) 331111 for Iron and Steel Mills.

### **4(b) Information Requested**

#### **(i) Data Items**

In this ICR, all the data that is recorded or reported is required by the NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY).

A source must make the following reports:

<b>Notifications</b>	
Scrap management and pollution prevention plan	63.10685(a)(1) and (b)(1)
Startup, shutdown, and malfunction plan	63.6(e)(3)
Notification of applicability	63.9(b)(1)
Notification and application of construction or reconstruction	63.9(b)(4)
Compliance extension	63.9(c)
Notification of special requirements	63.9(d)
Notification of performance test	63.9(e)
Notification of opacity and visible emission observations	63.9(f)
Additional COMS notifications	63.9(g)
Notification of compliance status	63.10690(b) and 63.9(h)

<b>Reports</b>	
Semiannual compliance reports	63.10685(c) 63.10(e)
Startup, shutdown, malfunction report	63.10(d)(5)(ii)

A source must keep the following records:

<b>Recordkeeping</b>	
Notifications and reports	63.10685(c), 63.10(b)(2)(xiv)
Startups, shutdowns, malfunctions	63.6(e)(1)(iii)-(v)
Performance tests, performance evaluations, and opacity observations	63.10686(d), 63.10(b)(2)(viii)-(ix)
Emission/operating limits	63.10(b)(2)(vii)
Scrap management requirements	63.10685(a)(1) 63.10685(b)(1)-(3) 63.10685(c) and 63.10(b)(2)(iii)
Continuous monitoring systems	63.10(b)(2)(vi)- (vii), (x)-(xi) 63.10(c); 63.6(h)(7);

<b>Recordkeeping</b>	
	63.8(d)(3)

### 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**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure.
Perform initial performance test 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:

<b>Agency Activities</b>
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 the 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 small entity for this industry is defined by the Small Business Administration as a firm having no more than 1,000 employees. Of all facilities that will be subject to the rule, only a few facilities are considered to be small entities.

Although these standards would not have a significant economic impact on the small entities, we tried to reduce the impact of the rule on small facilities. EPA met with industry trade associations and company representatives to address any small business concerns during development of the final rule.

### **5(d) Collection Schedule**



The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (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 neither conduct nor 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 4,450 (Total Labor Hours from Table 1 below). 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	\$144.33 (\$68.73+ 110%)
Technical	\$108.28 (\$51.56 + 110%)
Clerical	\$53.34 (\$25.40 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2016, “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 standards are labor costs. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance costs.

### **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 such activities 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 \$14,700.

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

Managerial	\$64.80 (GS-13, Step 5, \$40.50 + 60%)
Technical	\$48.08 (GS-12, Step 1, \$30.05 + 60%)
Clerical	\$26.02 (GS-6, Step 3, \$16.26 + 60%)

These rates are from the Office of Personnel Management (OPM), 2017 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 Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (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 91 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 91 per year.

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

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not	(D) Number of Existing Respondents That	(E) Number of Respondents

<b>Number of Respondents</b>					
			submit reports	Are Also New Respondents	(E=A+B+C-D)
1	0	91	0	0	91
2	0	91	0	0	91
3	0	91	0	0	91
Average	0	91	0	0	91

<sup>1</sup> 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 91.

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

<b>Total Annual Responses</b>				
(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
Prepare scrap plan and scrap specifications	0	0	N/A	0
Initial performance tests	0	0	N/A	0
Notification of compliance status	0	0	N/A	0
Request for compliance extension	0	0	N/A	0
Notification of performance test	0	0	N/A	0
SSM report	91	1	N/A	91
Semiannual excess emissions reports	91	2	N/A	182
TOTAL (rounded)				273

The number of Total Annual Responses is 273.

The total annual labor costs are \$467,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (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 4,450. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost – NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (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 16 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 314 labor hours at a cost of \$14,700; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal).

We assume that these burdens for managerial tasks take 5% of the time required for technical tasks, mainly 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.

### **6(f) Reasons for Change in Burden**

There is an increase in burden hours and number of responses in this ICR compared to the previous ICR. This increase is not due to any program changes. The increase is due to three reasons: 1) this ICR adjusts the number of affected sources subject to the rule based on the latest available data; 2) this ICR corrects the number of sources keeping records and entering information in record system, as well as the number of sources estimated to submit SSM reports; and 3) consistent with the Terms of Clearance, this ICR assumes all existing respondents will have to familiarize with the regulatory requirements each year.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 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 neither conduct nor 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-2013-0323. 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), WJC 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) 566-1752. 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-2014-0323 and OMB Control Number 2060-0608 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 Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (A x B)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (C x D)	(F) Managemen t person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost per year <sup>b</sup>
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Familiarization with Regulatory Requirements	8	1	8	91	728	36.4	72.8	\$87,964.60
B. Required activities								
Initial performance tests <sup>c</sup>								
Prepare scrap plan and scrap specifications <sup>d</sup>	4	1	4	0	0	0	0	\$0
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Initial notification of applicability <sup>d</sup>	2	0	0	0	0	0	0	\$0
Notification of compliance status <sup>d</sup>	2	0	0	0	0	0	0	\$0
Request for compliance extension	N/A							
Notification of performance test <sup>c</sup>								
Startup, shutdown, and malfunction plan/reports <sup>e</sup>	4	1	4	91	364	18.2	36.4	\$43,982.30
Semiannual excess emissions reports <sup>e</sup>	2	2	4	91	364	18.2	36.4	\$43,982.30
<b>Subtotal for Reporting Requirements</b>						1,674		\$175,929
5. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	See 4A							

B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Develop record system <sup>d</sup>	4	1	4	0	0	0	0	\$0
E. Time to enter information <sup>f</sup>	0.5	52	26	91	2,366	118.3	236.6	\$285,884.96
F. Time to transmit or disclose information <sup>f</sup>	0.25	2	0.5	91	45.5	2.28	4.55	\$5,497.79
G. Time to adjust existing ways <sup>d</sup>	2	1	2	0	0	0	0	\$0
F. Time to train personnel <sup>d</sup>	4	1	4	0	0	0	0	\$0
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						2,773		\$291,400
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>g</sup></b>						4,450		\$467,000
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>g</sup></b>								\$0
<b>GRAND TOTAL (rounded)<sup>g</sup></b>								<b>\$467,000</b>

**Assumptions:**

<sup>a</sup> There are 91 existing EAF steelmaking facilities and no new sources are estimated. We assume that each respondent will have to familiarize with the regulatory requirements each year.

<sup>b</sup> This ICR uses the following labor rates: \$144.33 for managerial labor, \$108.28 for technical labor, and \$53.34 for clerical labor. These rates are from the U.S. Department of Labor, Bureau of Labor Statistics, September 2016. The rates have been increased by 60 percent to account for overhead.

<sup>c</sup> All plants have conducted performance tests during the implementation period of the rule.

<sup>d</sup> After full implementation, existing facilities are not expected to experience any burden from these activities and no new facilities are expected to become subject to the rule over the 3-year period.

<sup>e</sup> Sources are required include in their semiannual reports the number of mercury switches removed or the weight of mercury recovered from the switches and properly managed, the estimated number of vehicles processed, an estimate of the percent of mercury switches recovered, and a certification that the recovered mercury switches were recycled at RCRA-permitted facilities, if they are subject to a site-specific plan for mercury. In addition, all sources must submit semiannual reports for the control of contaminants from scrap according to the requirements in §63.10(e). For start-up, shutdown, and malfunction, these semi-annual reports are only required if a startup or shutdown caused the source to exceed any applicable emission limitation in the relevant emission standards, or if a malfunction occurred during the reporting period. This ICR assumes each source had one six-month period during each year that required a report.

<sup>f</sup> Assumed that each facility will update records weekly. The only transmission is the semi-annual report and the annual SSM report.

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

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYYY) (Renewal)**

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (A x B)	(D) Plants per year <sup>a</sup>	(E) Technica l person- hours per year (C x D)	(F) Managemen t person- hours per year (E x 0.05)	(G) Clerical person- hours per year (E x 0.1)	(H) Cost, \$ <sup>b</sup>
Report Review								
Initial notification of applicability <sup>c</sup>	1	1	1	0	0	0	0	\$0
Startup, shutdown, malfunction plan/report <sup>d</sup>	2	1	2	91	182	9.1	18.2	\$9,813.80
Notification of compliance status <sup>c</sup>	1	1	1	0	0	0	0	\$0
Semiannual excess emissions report	0.5	2	1	91	91	4.55	9.1	\$4,906.90
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>e</sup></b>						<b>314</b>		<b>\$14,700</b>

**Assumptions:**

<sup>a</sup> There are 91 existing EAF steelmaking facilities and no new sources are estimated.

<sup>b</sup> This ICR uses the following average hourly labor rates: \$64.80 for managerial (GS-13, Step 5, \$40.50 × 1.6), \$48.08 (GS-12, Step 1, \$30.05 × 1.6) for technical and \$26.02 (GS-6, Step 3, \$16.26 × 1.6) for clerical. These rates are from the Office of Personnel Management (OPM) “2017 General Schedule” which excludes locality rates of pay.

<sup>c</sup> After full implementation, the agency is not expected to experience any burden from these activities because existing facilities are not longer expected to submit Initial notifications of applicability or Notifications of compliance status. No new facilities are expected to become subject to the rule over the 3-year period.

<sup>d</sup> This ICR assumes each source had one six-month period during each year that required a report.

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