

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal), EPA ICR Number 2267.05, OMB Control Number 2060-0605.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) were proposed on September 17, 2007, and promulgated January 2, 2008 (73 FR 252). These regulations apply to both new and existing iron and/or steel foundries that are an area source of hazardous air pollutants (HAP) emissions. There are different requirements for foundries based on size. Existing foundries with an annual metal melt production greater than 20,000 tons and new foundries with an annual melt capacity of 10,000 tons are classified as large foundries. Existing foundries with an annual metal melt capacity of 10,000 tons or less are classified as small foundries. Research and development facilities are not covered by the rule. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart ZZZZZ.

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. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

There are approximately 392 iron and steel foundry area source facilities (aka: the "Affected Public"), which are all privately-owned, for-profit businesses. None of the facilities in the United States are owned by either state, local, tribal or the Federal government. The burden to the Affected Public may be found below in the following three tables: 1) Table 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal); 2) Table 1b: Annual Respondent Burden and Cost for Large Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR

Part 63, Subpart ZZZZZ) (Renewal); and 3) Table 1c: Annual Respondent Burden and Cost for All Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR 63, Subpart ZZZZZ) (Renewal). The Federal Government’s burden is attributed 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 Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal).

Based on our consultations with industry representatives, there is an average of one affected facilities 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 392 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. This estimate consists of 316 small foundries and 76 large foundries.

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 iron foundries and steel foundries 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 ZZZZZ.

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 the 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 that the standards 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 ZZZZZ.

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's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the record-keeping 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 all compliance data. 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 these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Foundry Society, at (800) 537-4237, and the Steel Founders' Society of America, at (815) 455-9240. The Steel Founders' Society of America provided a list of closed foundries since 2002 and confirmed that no new foundries would be expected over the next three years. We used these data to adjust the number of respondents expected under this ICR. As a result, the number of existing respondents under this ICR is lower than the number of respondents estimated under the previous ICR renewal.

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 either 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 iron and steel foundries. The United States Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) codes for respondents affected by the standard are listed in the following table:

Standard (40 CFR Part 63, Subpart ZZZZZ)	SIC Codes	NAICS Codes
Iron Foundries	3321, 3322	331511
Steel Investment Foundries	3324	331512
Steel Foundries (except Investment)	3325	331513

4(b) Information Requested (Add or delete any items as appropriate)

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ).

A source must make the following reports:

Notifications	
Notification of applicability	§§63.9(b)(2), 63.10899(d)

Notifications	
Notification of compliance status	§§63.9(h)(1), 63.10900
Notification of compliance extension	§63.9(c)
Notification construction/reconstruction	§63.9(b)(5)
Notification of startup	§63.9(b)(4)
Notification of foundry reclassification	§63.10895(e)
Notification of repeat performance test	§§63.9(e), 63.10898
Notification of opacity/VE observations (large foundries)	§63.9(f)
Notification of performance evaluation	§63.9(g)

Reports	
Semiannual excess emissions/deviation reports	§§63.10(e)(3), 63.10899(b)(2), 63.10899(c)
Initial performance test report (large foundries)	§§63.7(e)(1), 63.10898

A source must keep the following records:

Recordkeeping	
Material specifications – written materials specifications, records that demonstrate compliance with requirements for restricted metallic scrap, general scrap, mercury, and scrap that does not contain motor vehicle scrap.	§§63.10899(b)(1), 63.10890(e)(2)
Mercury – records of number of mercury switches removed or weight of mercury recovered, estimated number of vehicles processed, estimate the percent of mercury switches recovered; records identifying each scrap provider and documenting the scrap provider's participation in an approved mercury switch removal program	§§63.10899(b)(2)- (3), 63.10890(e)(3)- (4)
Non-methanol binder chemical formulations - Material Safety Data Sheet, certified product data sheet, or a manufacturer's hazardous air pollutant data sheet.	§§63.10899(b)(4), 63.10890(e)(5)
Annual quantity and composition of each HAP-containing chemical binder or coating material - copies of purchasing records, Material Safety Data Sheets, or other documentation that provide information on the binder or coating materials used	§§63.10899(b)(5), 63.10890(e)(6)

Recordkeeping	
Metal melt production	§§63.10899(b)(6), 63.10890(e)(7)
Operation and maintenance plan (large foundries)	§63.10899(b)(7)
If applicable, emissions averaging plan (large foundries)	§63.10899(b)(8)
Bag leak detection system (new sources) (large foundries)	§63.10899(b)(9)
Capture system inspections (large foundries)	§63.10899(b)(10)
CPMS specifications (large foundries)	§63.10899(b)(11)
Corrective action (large foundries)	§63.10899(b)(12)
PM control device log of inspections/maintenance (large foundries)	§§63.10899(b)(13), 63.10897

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 or 1A; 2, 2A, 2C, 2D, 2F, or 2G, 3, 3A, or 3B; 4; 5, 5B, 5D, 5F, or 5I; 29; 9 or 22 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

Respondent Activities
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 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 500 employees. Approximately 303 of the 392 iron and steel foundries are small entities. Approximately 45 percent (34 of 76) of the large iron and steel foundries (annual metal melt production greater than 20,000 tons) are owned by small entities while 85 percent (269 of 316) of the small iron and steel foundries are owned by small entities. The final rule includes a specific compliance option for small foundries that provides a maximum degree of operational flexibility, and the ICR requirements are the minimum necessary to demonstrate compliance.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in: Table 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ); Table 1b: Annual Respondent Burden and Cost for Large Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ)(Renewal); and Table 1c: Annual Respondent Burden and Cost for All Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR 63, Subpart ZZZZZ)(Renewal).

6. Estimating the Burden and Cost of the Collection

Tables 1a-1c document 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 9,140 hours (Total Labor Hours from Table 1c 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	\$149.35 (\$71.12 + 110%)
Technical	\$112.98 (\$53.80 + 110%)
Clerical	\$54.81 (\$26.10 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, "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 these 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 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 \$33,900.

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 Federal government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (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 392 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 392 per year. A total of 316 of the 392 facilities have metal melting rate of 20,000 tpy or less (aka: small foundries) and 76 have metal melting rates greater than 20,000 tpy (aka: large foundries).

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	392	0	0	392
2	0	392	0	0	392
3	0	392	0	0	392
Average	0	392	0	0	392

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 392.

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
Initial Notification of Applicability	0	0	0	0

Total Annual Responses				
Notification of Compliance Status	0	0	0	0
Notification of Foundry Reclassification	0	0	0	0
Deviations Report (small foundries)	158	1	0	158
Repeat of Performance Test for PM (large foundries)	76	0.2	0	15.2
SSM plan (large foundries)	76	1	0	76
Semiannual compliance reports (large foundries)	76	2	0	152
			Total	401

The number of Total Annual Responses is 401 (rounded).

The total annual labor costs are \$1,000,000 (rounded). Details regarding these estimates may be found below in Tables 1a-1c: Annual Respondent Burden and Cost – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (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 1a-1c and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 9,140. Details regarding these estimates may be found below in Tables 1a-1c. Annual Respondent Burden and Cost – Annual Respondent Burden and Cost – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (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 23 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 724 labor hours at a cost of \$33,900; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (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.

6(f) Reasons for Change in Burden

There is an adjustment increase in the total estimated respondent burden compared with the ICR currently approved by OMB. While the overall number of respondents has decreased from 427 to 392 since the previous ICR renewal to account for shutdown facilities, this renewal includes a burden estimate for each existing respondent to familiarize themselves with regulatory requirements each year. As a result, there is a net increase in the burden hours as compared to the previous ICR renewal.

There is an adjustment decrease in the estimated number of responses resulting from the smaller number of respondents.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 23 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-2014-0096. 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-2014-0096 and OMB Control Number 2060-0605 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 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person-hours per year (E=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. Surveys and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Familiarization with Regulatory Requirements ^a	1	1	1	316	316	15.8	31.6	\$39,793.41
B. Required activities								
Repeat performance tests for opacity ^e	0.1	2	0.2	316	63.2	3.16	6.32	\$7,958.68
Scrap specifications ^g	4	1	4	0	0	0	0	\$0
Monthly emission averaging calculation	0.25	12	3	316	948	47.4	94.8	\$119,380.22
No methanol binder formulation ^c	0	0	0	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 ^g	2	1	2	0	0	0	0	\$0
Notification of compliance status ^g	4	1	4	0	0	0	0	\$0
Deviations report ^a	1	1	1	158	158	7.9	15.8	\$19,896.70
Notification of construction/reconstruction ^g	N/A							
Notification of anticipated startup ^g	N/A							
Notification of actual startup ^g	N/A							
Notification of foundry reclassification ^f	1	0	0	0	0	0	0	\$0
Request for compliance extension ^g	N/A							
Notification of repeat performance test ^e	N/A							

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
Site specific test plan ^g	N/A							
Notification of performance evaluation ^g	N/A							
Quality assurance plan for CEMS/COMS ^g	N/A							
NESHAP waiver request ^g	N/A							
Startup, shutdown, and malfunction plan/reports ^h	N/A							
Semiannual excess emissions reports ^h	N/A							
Subtotal for Reporting Requirements						1,708		\$187,029
5. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	See 4A							
B. Plan activities	See 4A							
C. Implement activities	See 4A							
D Develop record system ^h	2	1	2	0	0	0	0	\$0
E. Time to enter information ^d	0.1	52	5.2	316	1,643.2	82.16	164.32	\$206,925.71
F. Time to transmit or disclose information	0.25	2	0.5	316	158.0	7.90	15.80	\$19,896.70
G. Time to adjust existing ways ^g	2	1	2	0	0	0	0	\$0
F. Time to train personnel ⁱ	4	1	4	316	1,264	63.2	126.4	\$159,174
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						3,525		\$385,996
TOTAL LABOR BURDEN AND COST (rounded)^j						5,230		\$573,000
TOTAL CAPITAL AND O&M COST (rounded) ^j								\$0
GRAND TOTAL (rounded)^j						5,230		\$573,000

^a Taking into account shutdown data for foundries, we have assumed that there are 392 existing iron and steel foundries that area sources. No new sources are projected during the 3-year term of this ICR. A total of 316 of the 392 facilities are small foundries and 76 are large foundries. For the purpose of deviation reports, 1 report per year is estimated for one-half of the small foundries. We assume all respondents will have to spend time familiarizing themselves with regulatory requirements each year.

^b This ICR uses the following labor rates: The hourly wage rates used to represent respondent labor costs are: technical at \$112.98, management at \$149.35, and clerical at \$54.81.

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2017, “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 no burden would be incurred for this requirement because all small area source foundries are already meeting the no methanol requirement.

^d We have assumed that small foundries must record information to demonstrate compliance with pollution prevention management practices for metallic scrap and binder formulations. In addition, they would need to record information to demonstrate compliance with the PM and opacity standards.

^e We have assumed that all foundries would need to conduct performance tests to demonstrate compliance with the opacity limit in §63.10895(e) at least every 6 months and will not implement a process change likely to increase fugitive emissions over the 3 year period of this ICR. Opacity shall be determined as an average of 24 consecutive observations recorded at 15-second intervals, which average about 6 minutes (or 0.1 hrs). No separate notification required but the results of the opacity emissions will be reported.

^f We have assumed that no foundries will be reclassified as large foundries.

^g One-time only costs

^h No excess emissions or startup shutdown reports were required from small foundries during this 3-year ICR renewal period.

ⁱ We have assumed that small foundries are expected to monitor visible emissions using a trained employee.

^j Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Small foundries are not assumed to incur any capital or O&M costs.

Table 1b: Annual Respondent Burden and Cost for Large Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t 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. Surveys and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Familiarization with Regulatory Requirements ^a	1	1	1	76	76	3.8	7.6	\$9,570.57
B. Required activities								
Repeat of Performance Test for PM ^d	24	0.2	4.8	76	364.8	18.24	36.48	\$45,938.72
Repeat of Performance Test for Opacity ^e	0.1	2	0.2	76	15.2	0.76	1.52	\$1,914.11
Scrap material specifications ^g	4	1	4	0	0	0	0	\$0
Prepare operation & maintenance plan ^g	8	1	8	0	0	0	0	\$0
No methanol binder formulation ^c	4	1	4	0.67	2.68	0.13	0.27	\$337.49
Initial/subsequent performance tests ^d	0	0	0	0	0	0	0	\$0
Initial and periodic inspections of PM control devices, monthly inspection of capture systems ^d	0	0	0	0	0	0	0	\$0
Monthly emissions averaging calculations ^d	0	0	0	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 ^h	4	1	4	0	0	0	0	\$0
Notification of compliance status ^h	8	1	8	0	0	0	0	\$0
Notification of construction/reconstruction ^h	N/A							
Notification of actual startup ^h	N/A							
Notification of foundry reclassification ⁱ	1	0	0	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 (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
Request for compliance extension ^h	N/A							
Notification of repeat PM performance test ^d	1	0.2	0.2	76	15.2	0.76	1.52	\$1,914.11
Site specific test plan ^h	0	0	0	0	0	0	0	\$0
Notification of performance evaluation ^h	N/A							
Quality assurance plan for CEMS/COMS ^h	N/A							
NESHAP waiver request ^h	N/A							
Startup, shutdown, and malfunction plan/reports ^j	4	1	4	76	304	15.2	30.4	\$38,282.26
Semiannual excess emissions reports ^j	2	2	4	76	304	15.2	30.4	\$38,282.26
Subtotal for Reporting Requirements					1,244			\$136,240
5. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	See 4A							
B. Plan activities	See 4A							
C. Implement activities	See 4A							
D Develop record system ^h	4	1	4	0	0	0	0	0
E. Time to enter information ^f	0.5	52	26	76	1,976	98.8	197.6	\$248,834.72
F. Time to transmit or disclose information	0.25	2	0.5	76	38	1.9	3.8	\$4,785.28
G. Time to adjust existing ways ^h	2	1	2	0	0	0	0	\$0
F. Time to train personnel ^g	4	1	4	76	304	15.2	30.4	\$38,282.26
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					2,666			\$291,902
TOTAL LABOR BURDEN AND COST (rounded)^k					3,910			\$428,000
TOTAL CAPITAL AND O&M COST (rounded)^k								\$0

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
GRAND TOTAL (rounded)^k						3,910		\$428,000

^a Taking into account shutdown data for foundries, we have assumed that there are 392 existing iron and steel foundries that area sources. No new sources are projected during the 3-year term of this ICR. A total of 316 of the 392 facilities are small foundries and 76 are large foundries. We assume all respondents will have to spend time familiarizing themselves with regulatory requirements each year.

^b This ICR uses the following labor rates: The hourly wage rates used to represent respondent labor costs are: technical at \$112.98, management at \$149.35, and clerical at \$54.81. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, "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 assumed that two large area source foundries (2 foundries over 3 years = 0.67 foundries per year) are expected to have to change formulations to meet the no methanol requirement.

^d We have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal melting furnace subject to a PM or total metal HAP limit in §63.10895(c) at least every 5 years (or 0.2 averaged on a yearly basis) and will not implement a performance test due to a change to an operating limit or a process change likely to increase HAP emissions over the period of this ICR. A notification is required.

^e We have assumed that all foundries would need to conduct performance tests to demonstrate compliance with the opacity limit in §63.10895(e) at least every 6 months and will not implement a process change likely to increase fugitive emissions over the 3 year period of this ICR. Opacity shall be determined as an average of 24 consecutive observations recorded at 15-second intervals, which average about 6 minutes (or 0.1 hrs). No separate notification required.

^f We have assumed that large foundries must record information to demonstrate compliance with pollution prevention management practices for metallic scrap and binder formulations and information to demonstrate compliance with monitoring; inspection; operation and maintenance; startups, shutdowns, and malfunctions; and other requirements of the General Provisions (40 CFR part 63, subpart A). In addition, record to record information to demonstrate compliance with the PM and opacity standards.

^g We have assumed that large foundries are expected to monitor visible emissions using a trained employee.

^h One-time only costs

ⁱ We have assumed that no foundries will be reclassified as small foundries.

^j We have assumed that all large foundries will submit one startup shutdown malfunction report per year and all will submit semi-annual excess emission reports.

^k Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Large foundries are not assumed to incur any capital or O&M costs.

Table 1c: Annual Respondent Burden and Cost for All Foundries – NESHAP for Iron and Steel Foundries Area Sources (40

CFR Part 63, Subpart ZZZZZ) (Renewal)

Category	Reporting Hours	Recordkeeping Hours	Total Labor Hours	Labor Cost	Number of Responses
Small Foundry	1,708	3,525	5,230	\$573,000	158
Large Foundry	1,244	2,666	3,910	\$428,000	243
Total	2,952	6,191	9,140	\$1,000,000	401

Table 2: Average Annual EPA Burden and Cost – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (AxB)	(D) Plants 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) Cost, \$ ^b
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Report Review:								
Initial notification of applicability ^c	1	1	1	0	0	0	0	\$0
Deviation reports ^a	1	1	1	158	158	7.9	15.8	\$8,519.68
Startup, shutdown, malfunction plan/report ^a	2	1	2	76	152	7.6	15.2	\$8,196.14
Notification of compliance status ^c	2	1	2	0	0	0	0	\$0
Notification of performance test ^d	1	0.2	0.2	76	15.2	0.76	1.52	\$819.61
Semiannual excess emissions report ^a	2	2	4	76	304	15.2	30.4	\$16,392.29
TOTAL BURDEN AND COST (rounded)^e						724		\$33,900

Assumptions:

^a Taking into account shutdown data for foundries, we have assumed that there are 392 existing iron and steel foundries that are area sources. No new sources are projected during the 3-year term of this ICR. A total of 316 of the 392 facilities are small foundries and 76 are large foundries. For the purpose of deviation reports, 1 report per year is estimated for one-half of the small foundries. For SSM plan/reports and semiannual reports all large foundries (76 respondents) will submit reports.

^b This ICR uses the following average hourly labor rates (GS-13, Step 5, \$ x 1.6): 64.80 for managerial, \$48.08 for technical and \$26.02 for clerical. These rates are from the Office of Personnel Management (OPM) "2017 General Schedule" which excludes locality rates of pay.

^c One-time only costs

^d We have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal melting furnace subject to a PM or total metal HAP limit in §63.10895(c) at least every 5 years (or 0.2 averaged on a yearly basis) and will not implement a performance test due to change to an operating limit or a process change likely to increase HAP emissions.

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