

Table 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foundries

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)
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 <sup>a</sup>	1	1	1
B. Required activities			
Repeat performance tests for opacity <sup>e</sup>	0.1	2	0.2
Scrap specifications <sup>g</sup>	4	1	4
Monthly emission averaging calculation	0.25	12	3
No methanol binder formulation <sup>c</sup>	0	0	0
C. Create information	See 4B		
D. Gather existing information	See 4B		
E. Write report	See 4B		
Initial notification of applicability <sup>g</sup>	2	1	2
Notification of compliance status <sup>g</sup>	4	1	4
Deviations report <sup>a</sup>	1	1	1
Notification of construction/reconstruction <sup>g</sup>	N/A		
<del>Notification of anticipated startup<sup>g</sup></del>	<del>N/A</del>		
Notification of actual startup <sup>g</sup>	N/A		
Notification of foundry reclassification <sup>f</sup>	1	0	0
Request for compliance extension <sup>g</sup>	N/A		
Notification of repeat performance test <sup>e</sup>	N/A		
Site specific test plan <sup>g</sup>	N/A		
Notification of performance evaluation <sup>g</sup>	N/A		
Quality assurance plan for CEMS/COMS <sup>g</sup>	N/A		
NESHAP waiver request <sup>g</sup>	N/A		
Startup, shutdown, and malfunction plan/reports <sup>h</sup>	N/A		
Semiannual excess emissions reports <sup>h</sup>	N/A		
<b>Subtotal for Reporting Requirements</b>			
5. Recordkeeping Requirements			
A. Familiarization with Regulatory Requirements	See 4A		
B. Plan activities	See 4A		
C. Implement activities	See 4A		
D. Develop record system <sup>h</sup>	2	1	2
E. Time to enter information <sup>d</sup>	0.1	52	5.2
F. Time to transmit or disclose information	0.25	2	0.5

G. Time to adjust existing ways <sup>g</sup>	2	1	2
F. Time to train personnel <sup>i</sup>	4	1	4
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 AND O&amp;M COST (rounded)<sup>j</sup></b>			
<b>GRAND TOTAL (rounded)<sup>j</sup></b>			

**Assumptions:**

<sup>a</sup> Taking into account shutdown data for foundries, we have assumed that there are 392 existing iron and steel foundries th

<sup>b</sup> This ICR uses the following labor rates: The hourly wage rates used to represent respondent labor costs are: technical a

<sup>c</sup> We have assumed that no burden would be incurred for this requirement because all small area source foundries are alre

<sup>d</sup> We have assumed that small foundries must record information to demonstrate compliance with pollution prevention m

<sup>e</sup> We have assumed that all foundries would need to conduct performance tests to demonstrate compliance with the opacit

<sup>f</sup> We have assumed that no foundries will be reclassified as large foundries.

<sup>g</sup> One-time only costs

<sup>h</sup> No excess emissions or startup shutdown reports were required from small foundries during this 3-year ICR renewal per

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

<sup>j</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Small foundries are not a



0	0	0	0	\$0
316	1,264	63.2	126.4	\$159,174
	<b>3,525</b>			<b>\$385,996</b>
	<b>5,230</b>			<b>\$573,000</b>
				<b>\$0</b>
	<b>5,230</b>			<b>\$573,000</b>

at area sources. No new sources are projected during the 3-year term of this I  
t \$112.98, management at \$149.35, and clerical at \$54.81. These rates are from  
ady meeting the no methanol requirement.

anagement practices for metallic scrap and binder formulations. In addition, th  
y limit in §63.10895(e) at least every 6 months and will not implement a proce

iod.

assumed to incur any capital or O&M costs.

**ERG comment on changes**

added respondent burden and referenced footnote a, but decreased this burden from 4 to 1 hr for ongoing burden

do not see rolling average in rule, just emission averaging; monthly basis

added footnote a which describes assumption of half the sources submitting a deviations report

added footnote g since this is one-time

This is no longer required in the General Provisions, it has been reserved and removed, so removed from this table.

added footnote g since this is one-time

added footnote g since this is one-time

this was the line item for footnote E which talks about opacity and lack of need for separate notification

added footnote g since this is one-time

added footnote g since this is one-time

added footnote g since this is one-time

added footnote g since this is one-time

new footnote H since we did not assume any small sources would have to write this report

new footnote H since we did not assume any small sources would have to write this report

added footnote g since this is one-time

added training time

CR. 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 in the United States Department of Labor, Bureau of Labor Statistics, [March 2017](#), “Table 2. Civilian Workers, by occupational and industry group

they would need to record information to demonstrate compliance with the PM and opacity standards.

Mass change likely to increase fugitive emissions over the 3 year period of this ICR. Opacity shall be determined as an average of 24 consecutive c

estimated for one-half of the small foundries. We assume all respondents will have to spend time familiarizing themselves with reg  
up.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit p

This footnote did not belong to any row. Looking at table 1b this was meant for the time to enter information' line item so I added  
observations recorded at 15-second intervals, which average about 6 minutes (or 0.1 hrs). No separate notification required but the :

regulatory requirements each year.

packages available to those employed by private industry.

See footnote D to that row above.

results of the opacity emissions will be reported.



Table 1b: Annual Respondent Burden and Cost for Large Foundries - NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, §

June 2017:

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 <sup>a</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 <sup>a</sup>	1	1	1	76
B. Required activities				
Repeat of Performance Test for PM <sup>d</sup>	24	0.2	4.8	76
Repeat of Performance Test for Opacity <sup>e</sup>	0.1	2	0.2	76
Scrap material specifications <sup>g</sup>	4	1	4	0
Prepare operation & maintenance plan <sup>g</sup>	8	1	8	0
No methanol binder formulation <sup>c</sup>	4	1	4	0.67
Initial/subsequent performance tests <sup>d</sup>	0	0	0	0
Initial and periodic inspections of PM control devices, monthly inspection of capture systems <sup>d</sup>	0	0	0	0
Monthly emissions averaging calculations <sup>d</sup>	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>h</sup>	4	1	4	0
Notification of compliance status <sup>h</sup>	8	1	8	0
Notification of construction/reconstruction <sup>h</sup>	N/A			
<del>Notification of anticipated startup<sup>h</sup></del>	<del>N/A</del>			
Notification of actual startup <sup>h</sup>	N/A			
Notification of foundry reclassification <sup>i</sup>	1	0	0	0
Request for compliance extension <sup>h</sup>	N/A			
Notification of repeat PM performance test <sup>d</sup>	1	0.2	0.2	76
Site specific test plan <sup>h</sup>	0	0	0	0
Notification of performance evaluation <sup>h</sup>	N/A			
Quality assurance plan for CEMS/COMS <sup>h</sup>	N/A			
NESHAP waiver request <sup>h</sup>	N/A			
Startup, shutdown, and malfunction plan/reports <sup>j</sup>	4	1	4	76
Semiannual excess emissions reports <sup>j</sup>	2	2	4	76
<b>Subtotal for Reporting Requirements</b>				
5. Recordkeeping Requirements				
A. Familiarization with Regulatory Requirements	See 4A			
B. Plan activities	See 4A			
C. Implement activities	See 4A			
D. Develop record system <sup>h</sup>	4	1	4	0
E. Time to enter information <sup>f</sup>	0.5	52	26	76
F. Time to transmit or disclose information	0.25	2	0.5	76
G. Time to adjust existing ways <sup>h</sup>	2	1	2	0
F. Time to train personnel <sup>g</sup>	4	1	4	76

G. 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 COST (rounded)<sup>k</sup></b>				
<b>GRAND TOTAL (rounded)<sup>k</sup></b>				

**Assumptions:**

- <sup>a</sup> Taking into account shutdown data for foundries, we have assumed that there are 392 existing iron and steel foundries that area sources
- <sup>b</sup> This ICR uses the following labor rates: The hourly wage rates used to represent respondent labor costs are: technical at \$112.98, man
- <sup>c</sup> We assumed that two large area source foundries (2 foundries over 3 years = 0.67 foundries per year) are expected to have to change fo
- <sup>d</sup> We have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal me
- <sup>e</sup> We have assumed that all foundries would need to conduct performance tests to demonstrate compliance with the opacity limit in §63.
- <sup>f</sup> We have assumed that large foundries must record information to demonstrate compliance with pollution prevention management prac
- <sup>g</sup> We have assumed that large foundries are expected to monitor visible emissions using a trained employee.
- <sup>h</sup> One-time only costs
- <sup>i</sup> We have assumed that no foundries will be reclassified as small foundries.
- <sup>j</sup> We have assumed that all large foundries will submit one startup shutdown malfunction report per year and all will submit semi-annual
- <sup>k</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Large foundries are not assumed to inc

Subpart ZZZZ (Renewal)

112.98      149.35      54.81

(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 <sup>b</sup>
76	3.8	7.6	\$9,570.57
364.8	18.24	36.48	\$45,938.72
15.2	0.76	1.52	\$1,914.11
0	0	0	\$0
0	0	0	\$0
2.68	0.13	0.27	\$337.49
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
15.2	0.76	1.52	\$1,914.11
0	0	0	\$0
304	15.2	30.4	\$38,282.26
304	15.2	30.4	\$38,282.26
<b>1,244</b>			<b>\$136,240</b>
0	0	0	0
1,976	98.8	197.6	\$248,834.72
38	1.9	3.8	\$4,785.28
0	0	0	\$0
304	15.2	30.4	\$38,282.26

	<b>2,666</b>		<b>291,902</b>
	<b>3,910</b>		<b>428,000</b>
			<b>\$0</b>
	<b>3,910</b>		<b>\$428,000</b>

s. No new sources are projected during the 3-year term of the agreement at \$149.35, and clerical at \$54.81. These rates are formulations to meet the no methanol requirement. melting furnace subject to a PM or total metal HAP limit in §6 10895(e) at least every 6 months and will not implement a practices for metallic scrap and binder formulations and inform:

excess emission reports.  
 or any capital or O&M costs.

**ERG comment on changes**

Added this as an ongoing burden per OMB requirement, but decreased hours from 8 to 1 for re-familiarization of rule

This is no longer required in the General Provisions, it has been reserved and removed, so removed from this table.

added footnote h, one-time

added footnote h, one-time

added footnote h, one-time

added footnote h, one-time

added footnote h, one-time

added footnote j

added footnote j

his 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 from the United States Department of Labor, Bureau of Labor Statistics, June 2017, "Table 2. Civilian Workers, by occupational and industry g

3.10895(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 li process change likely to increase fugitive emissions over the 3 year period of this ICR. Opacity shall be determined as an average of 24 consecu ation to demonstrate compliance with monitoring; inspection; operation and maintenance; startups, shutdowns, and malfunctions; and other requ

familiarizing themselves with regulatory requirements each year.

group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit package

limit or a process change likely to increase HAP emissions over the period of this ICR. A notification is required.

tive observations recorded at 15-second intervals, which average about 6 minutes (or 0.1 hrs). No separate notification required.

irements of the General Provisions (40 CFR part 63, subpart A). In addition, record to record information to demonstrate compliance with the

new footnote i

added footnote j

relabelled to k

is available to those employed by private industry.

e PM and opacity standards.



**Table 1c: Annual Respondent Burden and Cost for All Foundries – NESHAP for Iron and Steel Foundry Area So**

<b>Category</b>	<b>Reporting Hours</b>	<b>Recordkeeping Hours</b>	<b>Total Labor Hours</b>	<b>Labor Cost</b>
Small Foundry	1,708	3,525	5,230	\$573,000
Large Foundry	1,244	2,666	3,910	\$428,000
<b>Total</b>	<b>2,952</b>	<b>6,191</b>	<b>9,140</b>	<b>\$1,000,000</b>

23 hr per resp

**urces (40 CFR Part 63, Subpart ZZZZ) (Renewal)**

<b>Number of Response</b>
158
243
<b>401</b>

**Table 2: Average Annual EPA Burden and Cost - NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZ) (I**

2017: 48.08 64.8

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 <sup>a</sup>	(E) Technical person-hours per year (Cx D)	(F) Management person-hours per year (Ex0.05)
Report Review:						
Initial notification of applicability <sup>c</sup>	1	1	1	0	0	0
Deviation reports <sup>a</sup>	1	1	1	158	158	7.9
Startup, shutdown, malfunction plan/report <sup>a</sup>	2	1	2	76	152	7.6
Notification of compliance status <sup>c</sup>	2	1	2	0	0	0
Notification of performance test <sup>d</sup>	1	0.2	0.2	76	15.2	0.76
Semiannual excess emissions report <sup>a</sup>	2	2	4	76	304	15.2
<b>TOTAL BURDEN AND COST (rounded)<sup>e</sup></b>						<b>724</b>

**Assumptions:**

- <sup>a</sup> Taking into account shutdown data for foundries, we have assumed that there are 392 existing iron and steel foundries that are area sources.
- <sup>b</sup> 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 \$26.00 for management.
- <sup>c</sup> One-time only costs
- <sup>d</sup> We have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal.
- <sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Renewal)

26.02

<b>(G) Clerical person-hours per year (Ex0.1)</b>	<b>(H) Cost, \$ <sup>b</sup></b>
0	0
15.8	\$8,519.68
15.2	\$8,196.14
0	\$0
1.52	\$819.61
30.4	\$16,392.29
	<b>\$33,900</b>

sources. No new sources are projected c  
02 for clerical. These rates are from the

melting furnace subject to a PM or total 1

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 Office of Personnel Management (OPM) "2017 General Schedule" which excludes locality rates of pay.

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

deviation reports, 1 report per year is estimated for one-half of the small foundries. For SSM plan/reports and semiannual reports all large f  
to change to an operating limit or a process change likely to increase HAP emissions.

ountries (76 respondents) will submit reports.

(A)	(B)	(C)	(D)
<b>Information Collection Activity</b>	<b>Number of Respondents</b>	<b>Number of Responses</b>	<b>Number of Existing Respondents That Keep Records But Do Not Submit Reports</b>
Initial Notification	0	0	0
Notification of Compliance Status	0	0	0
Notification of Foundry Reclassification	0	0	0
Deviations Report (small foundries)	158	1	0
Repeat of Performance Test for PM (large foundries) <sup>a</sup>	76	0.2	0
SSM plan (large foundries)	76	1	0
Semiannual compliance reports (large foundries)	76	2	0
			<b>Total</b>



(E)

**Total Annual Responses**

$$E=(B \times C)+D$$

0

0

0

158

15.2

76

152

**401**

	Old ICR (2267.04)				
	<u>Number of Sources</u>	<u>Distribution</u>	<u>Number of Small Entity</u>	<u>Basis</u>	<u>Number of Sources</u>
<b>Total</b>	427	1.00	330		392
<i>small</i>	344	0.81	292	85% of small foundries are small entities	316
<i>large</i>	83	0.19	37	45% of large foundries are small entities	76

**New ICR (2267.05)**

<b><u>Basis</u></b>	<b><u>Number of Small Entity</u></b>	<b><u>Basis</u></b>
total foundries taking into account 35 shutdowns since 2008 per Steel Founders' Society of America consultation response		
revised small count	269	85% of small foundries are small entities
revised large count	34	45% of large foundries are small entities