

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese  
(40 CFR Part 63, Subpart XXX) (Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (40 CFR Part 63, Subpart XXX) (Renewal), EPA ICR Number 1831.07, OMB Control Number 2060-0391.

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

The NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese were proposed on August 4, 1998, promulgated on May 20, 1999, and amended on March 22, 2001, June 23, 2003, and April 20, 2006. On September 4, 2014, EPA proposed supplemental amendments to address particulate emissions standards covering facilities that produce ferroalloys based on the residual risk and technology reviews required under the Clean Air Act. These supplemental rule amendments were finalized on June 30, 2015 (80 FR 37366). The EPA announced reconsideration on certain issues of the supplemental rule on July 12, 2016 and finalized amendments to the rule on January 18, 2017 (82 FR 5401). The burden in this ICR reflects the burden associated with the recordkeeping and reporting requirements of the regulation for existing sources prior to the June 30, 2015 final rule amendments and January 18, 2017 reconsideration notice. The burden associated with the final rule amendments and reconsideration notice is accounted for in EPA ICR No. 2448.02 (OMB Control No. 2060-0676) and has not been incorporated here to avoid overlapping burden. Once approved, the burden in EPA ICR Number 2448.02 will be combined with EPA ICR Number 1831.07 at the next renewal.

The regulation applies to new and existing ferroalloy production facilities that manufacture ferromanganese and silicomanganese, and that are either major sources of hazardous air pollutant (HAP) emissions or are co-located at major sources of HAPs. The following affected facilities at ferroalloy production plants are subject to this NESHAP rule: submerged arc furnaces; metal oxygen refining processes; crushing and screening operations; and fugitive dust sources. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is collected to assure compliance with 40 CFR Part 63, Subpart XXX.

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 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.

The "Affected Public" are owners and operators of either new or existing ferroalloy production facilities that manufacture ferromanganese and silicomanganese. The 'burden' to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (40 CFR Part 63, Subpart XXX) (Renewal). The 'burden' to the Federal Government is attributed entirely to work performed by either Federal government employees or government contractors. This burden may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (40 CFR Part 63, Subpart XXX) (Renewal). There are two ferroalloy production facilities which are owned and operated by the ferroalloy production industry. None of these two facilities in the United States are owned by either state, local, tribal or the Federal government. They both are owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there is one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately two respondents per year will be subject to these standards and no additional respondents per year will become subject to these same standards.

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 ferroalloy production 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 XXX.

### **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 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, that leaks are being detected and repaired, and that these standards are being met. The performance test may also be observed.

The required quarterly and 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 XXX.

### **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* for this renewal.

### **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 these standards, 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 two 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 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 Felman Productions, at (304) 882-1181, and Eramet Marietta, Inc., at (740) 374-1000.

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 owners or operators of all new and existing ferroalloys production facilities that are major sources or are co-located at major sources. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3313 (Electrometallurgical Products, except Steel) which corresponds to the North American Industry Classification System (NAICS) 331110 for Iron and Steel Mills and Ferroalloy Manufacturing (which includes Ferromanganese Manufacturing, Ferrosilicon Manufacturing, and Silicomanganese Ferroalloys Manufacturing).

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

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

In this ICR, all the data that is recorded or reported is required by the NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (40 CFR Part 63 Subpart XXX) (Renewal).

A source must make the following notifications and reports:

<b>Notifications</b>	
Notification of applicability if an area source becomes subject to the rule	§63.9 (b), §63.1658(a)
Notification of construction/reconstruction	§§63.5(a, b, d and e), §63.9(b), §63.1658(a)
Request for an extension of compliance status	§63.9(c), §63.1658(b)
Notification that source is subject to special compliance requirements	§63.9(d), §63.1658(c)
Notification of performance test	§63.9(e), §63.1658(d)
Notification of opacity and visible emission observations	§63.9(f), §63.1658(e)
Notification of compliance status	§63.9(h), §63.1658(f)

<b>Reports</b>	
Results of initial performance tests	§63.10(d)(2), §63.1659(a)(2)
Results of opacity or visible emission observations	§63.10(d)(3)
Progress reports if source has received an extension for compliance	§63.10(d)(4)
Immediate and periodic startup, shutdown, malfunction reports	§63.10(d)(5), §63.1659(a)(4)
Continuous monitoring systems (CMS) performance evaluations reports	§63.10(e)(2)
Semiannual summary reports of air pollution control device maintenance records, venture scrubbers, fugitive dust, and capture and bag leak detection systems	§63.1659(b), §63.1659(b)
Quarterly excess emissions reports and CMS performance report, unless a semiannual frequency has been approved	§63.10(e)(3)(i), §63.1628(d)(1), §63.1659(b)(6)
Request to reduce frequency of reporting to semiannual	§§63.10(e)(3)(ii-iv)

<b>Reports</b>	
Waiver of recordkeeping and reporting	§63.10(f)

A source must keep the following records:

<b>Recordkeeping</b>	
Maintain records of all information necessary to demonstrate compliance with standard including the occurrence and duration of startup, shutdown, or malfunction of operations	§63.10(a-c), §63.1660(a)(2)
Maintain records of process or control device parameters; manufacturer certification of monitoring device accuracy; bag leak detection system outputs, alarms, and associated implementation and corrective actions; maintenance and fugitive dust control plans; and maintenance inspections, repairs, replacements, or other corrective actions	§63.1660(b)
Maintain records for five years, with the most recent two years kept on site	§63.10(b)(1), §63.1660(a)(2), §63.1660(b)(2)

### 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. Electronic notifications are encouraged when possible.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Monitor shop opacity through one of the monitoring options, including: 1) monitor control system fan motor amperes and capture system damper positions once per shift; 2) install, calibrate, maintain, and operate CMS for volumetric flow rate through each separately ducted hood; and 3) install, calibrate, maintain, and operate for volumetric flow rate at the inlet of the air pollution control device and capture system damper positions once per shift.
Monitor baghouse operations on a regular basis (e.g., observe on a daily basis for the presence of visible emissions at baghouses and bag leak detection system). Conduct periodic visual inspections to ensure systems are working properly.

<b>Respondent Activities</b>
Monitor pressure drop and liquid supply pressure across the venturi scrubber.
Perform initial performance test and repeat performance test, if necessary. Reference Method 9 for opacity observations and Method 5 for determination of particulate matter concentrations and volumetric flow rates for baghouses without stacks.
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 collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for 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>
Observe initial performance tests and repeat performance tests, if necessary.
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. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The quarterly excess emissions 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**

The NESHAP for ferroalloys production facilities only applies to major sources. There are no small entities (i.e., small businesses) affected by this regulation. In addition, during the rule development process, the EPA closely reviewed existing permit conditions at existing facilities, and, where feasible, incorporated similar, if not identical, requirements in the final rule. The Agency considers these to be the minimum requirements needed to ensure compliance with these standards and, therefore, cannot reduce them further for small entities.

#### **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 Ferroalloys Production: Ferromanganese and Silicomanganese (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 the recordkeeping and reporting requirements is estimated to be 1,170 hours (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	\$147.40 (\$70.19+ 110%)
Technical	\$117.92 (\$56.15 + 110%)
Clerical	\$57.02 (\$27.15 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, “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 is labor costs. There are no capital/startup or operation and maintenance (O&M) 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 \$3,940. This cost is based on the average hourly labor rate as follows:

Managerial	\$65.71 (GS-13, Step 5, \$41.07 + 60%)
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Technical	\$48.75 (GS-12, Step 1, \$30.47 + 60%)
Clerical	\$26.38 (GS-6, Step 3, \$16.49 + 60%)

These rates are from the Office of Personnel Management (OPM), 2018 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 Ferroalloys Production: Ferromanganese and Silicomanganese (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 two 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 two per year.

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 <sup>1</sup>	(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	2	0	0	2
2	0	2	0	0	2
3	0	2	0	0	2
Average	0	2	0	0	2

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting the respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is two.

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 notifications	0	5	0	0

<b>Total Annual Responses</b>				
Notification of annual performance test	2	1	0	2
Notification of opacity and visible emissions observations	2	1	0	2
Report of annual performance test results/opacity observations	2	1	0	2
Semiannual reports	2	2	0	4
Quarterly reports	2	4	0	8
Annual compliance status certification	2	1	0	2
			Total	20

The number of Total Annual Responses is 20.

The total annual labor costs are \$133,000.00 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (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 below in Tables 1 and 2, respectively, and summarized below.

##### **(i) Respondent Tally**

The total annual labor hours are 1,170 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (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 59 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 83 labor hours at a cost of \$3,940; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (Renewal).

We assume that 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, mainly because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

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

The burden in this ICR reflects the burden associated with the recordkeeping and reporting requirements of the regulation prior to the June 30, 2015 final rule amendments (80 FR 37366) and January 18, 2017 reconsideration notice (82 FR 5401). The burden associated with the final rule amendments and reconsideration notice is accounted for in EPA ICR No. 2448.02, OMB Control No. 2060-0676, and has not been incorporated here to avoid overlapping burden. There is an increase in the total estimated respondent burden compared with the ICR currently approved by OMB (EPA ICR Number 1831.06). The adjustment increase in burden is due to more accurate estimates of existing and anticipated new sources, as identified during the development of the final rule amendments.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 59 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-2014-0066. 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-2014-0066 and OMB Control Number 2060-0391 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 Ferroalloys Production: Ferromanganese and Silicomanganese (Renewal)**

Burden item	A	B	C	D	E	F	G	H
	Person-hours per occurrence	Annual occurrences per respondent	Person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <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 <sup>c</sup>								
A. Familiarize with Regulatory Requirements	1	1	1	2	2	0.1	0.2	\$261.98
B. Required activities	See 5C							
C. Create information	See 5C							
D. Gather information	See 5C							
E. Report preparation								
i. Initial notifications	N/A							
ii. Notification of reconstruction/modification	N/A							
iii. Notification of annual performance test	2	1	2	2	4	0.2	0.4	\$523.97
iv. Notification of opacity and visible observations	2	1	2	2	4	0.2	0.4	\$523.97
v. Report of performance test results/opacity observations	5	1	5	2	10	0.50	1.0	\$1,309.92
vi. Periodic startup, shutdown and malfunction reports	10	2	20	2	40	2	4	\$5,239.68
vii. Capture hood inspection report	4	2	8	2	16	0.8	1.6	\$2,095.87
viii. Summary report of maintenance records	4	2	8	2	16	0.8	1.6	\$2,095.87
ix. Fugitive dust operations report	4	2	8	2	16	0.8	1.6	\$2,095.87

x. Quarterly excess emissions report	4	4	16	2	32	1.6	3.2	\$4,191.74
xi. Annual compliance status certification	2	1	2	2	4	0.2	0.4	\$523.97
<b>Subtotal for Reporting Requirements</b>						<b>166</b>		<b>\$18,862.85</b>
5. Recordkeeping requirements								
A. Familiarize with Regulatory Requirements	See 4A							
B. Plan activities	10	1	10	2	20	1.0	2	\$2,619.84
C. Implement activities								
i. Control devices								
Annual Performance tests for submerged arc furnace control devices	50	1	50	2	100	5.0	10	\$13,099.20
Baghouse monitoring								
Daily	0.5	350	175	2	350	17.50	35.0	\$45,847.20
Weekly	0.1	50	5	2	10	0.50	1.0	\$1,309.92
Monthly	0.1	12	1.2	2	2.4	0.12	0.24	\$314.38
Quarterly	0.1	4	0.4	2	0.8	0.04	0.08	\$104.79
Semiannually	0.1	2	0.2	2	0.4	0.02	0.04	\$52.40
Parameter monitoring	0.1	1,050	105	2	210	10.50	21.0	\$27,508.32
ii. Monthly capture system inspection	2	12	24	2	48	2.4	4.8	\$6,287.62
iii. Opacity violation - scrubber	2	1	2	2	4	0.2	0.4	\$523.97
iv. Opacity violation - baghouse	2	20	40	2	80	4	8	\$10,479.36
v. Monitoring violation - capture system	2	12	24	2	48	2.4	4.8	\$6,287.62
D. Develop record system <sup>c</sup>	N/A							
E. Enter and transmit information	See 5C							
F. Personnel training	N/A							
G. Adjust existing ways to comply with previously applicable requirements	N/A							
H. Disclose information	N/A							
I. Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>1,005</b>		<b>\$114,434.61</b>



<b>TOTAL Labor Burden and Cost (rounded)<sup>d</sup></b>						<b>1,170</b>		<b>\$133,000</b>
<b>TOTAL Capital and O&amp;M Cost (rounded)<sup>d</sup></b>								<b>\$0</b>
<b>GRAND TOTAL (rounded)<sup>d</sup></b>								<b>\$133,000</b>

**Assumptions:**

a There are two ferroalloy production facilities currently subject to the standard. No additional respondents will become subject to this regulation since industry growth is not expected in the next three years.

b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

c Initial notification and compliance demonstration requirements and activities including the development its of record systems, including the startup, shutdown and malfunction plan; the fugitive dust plan; and the control equipment/maintenance plan, are only required for new respondents. Since there are no new respondents anticipated over the next three years of this ICR, there is no burden estimated for these activities.

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

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (Renewal)**

Burden item	A	B	C	D	E	F	G	H
	EPA person-hours per occurrence	Annual occurrences per respondent	EPA person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Annual cost (\$) <sup>b</sup>
1. Report reviews <sup>c</sup>								
A. Initial notifications	N/A							
B. Notification of reconstruction/modification	N/A							
C. Notification of annual performance test/opacity and visible emissions observations <sup>d</sup>	1	1	1	2	2	0.10	0.2	\$109.35
D. Report of performance test results/opacity observations	5	1	5	2	10	0.50	1.0	\$546.74
E. Semiannual summary reports	10	2	20	2	40	2	4	\$2,186.94
F. Quarterly excess emissions report	2	4	8	2	16	0.8	1.6	\$874.78
G. Annual compliance status certification	2	1	2	2	4	0.2	0.4	\$218.69
<b>TOTAL ANNUAL COST (ROUNDED)<sup>e</sup></b>						<b>83</b>		<b>\$3,940</b>

**Assumptions:**

a There are two ferroalloy production facilities currently subject to the standard. No additional respondents will become subject to this regulation since industry growth is not expected in the next three years.

b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and Clerical rate of \$26.38 (GS-6, Step 3, \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which excludes locality rates of pay.

c Initial notification and compliance demonstration requirements and activities including the development of record systems, including the startup, shutdown and malfunction plan; the fugitive dust plan; and the control equipment/maintenance plan, are only required for new respondents. Since there are no new respondents anticipated over the next three years of this ICR, there is no burden estimated for these activities.

d Notifications for performance testing and opacity and visible emissions observations are submitted concurrently for EPA review.

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