

Table 1: Annual Respondent Burden and Cost – NESHAP for Steel Pickling, HCl Process Facilities

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarization with regulatory requirements	1	1	1
B. Required activities			
Initial performance test ^c	125	1	125
Repeat initial performance test ^c	125	0.2	25
Periodic performance tests ^{d,e}	125	1	125
Operation and maintenance plan	40	1	40
Operation and maintenance plan revision ^f	20	1	20
C. Create information	See 3B		
D. Gather existing information	See 3B		
E. Write Report			
Notification of applicability ^g	2	1	2
Notification of construction/reconstruction ^g	2	1	2
Notification of anticipated startup ^g	2	1	2
Notification of actual startup ^g	2	1	2
Notification of special compliance requirements	N/A		
Notification of initial performance test ^g	2	1	2
Notification of compliance status ^g	4	1	4
NESHAP waiver application ^h	N/A		
Report of initial and periodic performance tests	See 3B		
Report of monitoring exceedances, including malfunctions ⁱ	16	2	32
Report of no excess emissions ^j	8	2	16
Reporting Subtotal			

4. Recordkeeping requirements			
A. Familiarization with regulatory requirements	See 3A		
B. Plan activities	See 3B		
C. Implement Activities	See 3B		
D. Develop record system	N/A		
E. Time to enter information			
Records of all information required by standards ^k	3	52	156
F. Time to train personnel	4	1	4
G. Time to transmit or disclose information ^l	0.25	3	0.75
H. Time for audits	N/A		
Recordkeeping Subtotal			
TOTAL LABOR BURDEN AND COST (rounded)^m			
TOTAL CAPITAL and O&M COSTS (rounded)^m			
GRAND TOTAL (rounded)^m			

Assumptions:

^a We have assumed that there are approximately 100 respondents subject to the standard (95 steel pickling subject to the regulation in the next three years. Since there are no new respondents estimated, initial perfor

^b This ICR uses the following labor rates: \$149.35 per hour for Executive, Administrative, and Managerial United States Department of Labor, Bureau of Labor Statistics, June 2017 “Table 12: Civilian workers, by increased by 110 percent to account for the benefit packages available to those employed by private industri

^c We have assumed that each new respondent will be required to conduct an initial performance test and 20

^d Each respondent is required to conduct a periodic performance test to measure either: (1) the HCl mass flow results must be reported within 2 months of the test date. Periodic performance tests must be conducted either no less frequently than every 2.5 years or twice per title V permit term. We are assuming that all periodic p

^e We have assumed that it will take 125 hours for each respondent to complete the periodic performance te

^f We have assumed that 10 percent of respondents must write a revised operation and maintenance plan for

^g We have assumed that all new sources will be required to meet initial notification requirements. Since th

^h We have assumed that no respondent will request a NESHAP waiver application.

ⁱ We have assumed that 20 percent of respondents will report excess emissions on a semiannual basis.

^j We have assumed that 80 percent of respondents will report no excess emissions on a semiannual basis.

^k We have assumed that each respondent will take three hours each week to record all information require

^l We have assumed that each respondent will take 15 minutes three times per year to transmit or disclose in

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

as and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (Renewal)

\$112.98

\$149.35

\$54.81

(D)	(E)	(F)	(G)	(H)
Respondents per year ^a	Technical person-hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Cost per year ^b
100	100	5	10	\$12,593
0	0	0	0	\$0
0	0	0	0	\$0
100	12500	625	1250	\$1,574,107.50
0	0	0	0	\$0
10	200	10	20	\$25,185.72
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
20	640	32	64	\$80,594.30
80	1280	64	128	\$161,188.61
		16,928		\$1,853,669

Not
bur
the
app
mai
also
We
bec
sho
to c
hov
any

100	15600	780	1560	\$1,964,486.16
0	0	0	0	\$0
100	75	3.75	7.5	\$9,444.65
		18,026		\$1,973,931
		35,000		\$3,830,000
				\$10,600
		35,000		\$3,840,000

total # Responses 200
hr/response 175

and 5 acid regeneration facilities). We have further assumed that no additional respondent per year will become rmance tests, initial operation and maintenance plans, and initial notifications do not apply.

l labor; \$112.98 per hour for Technical labor, and \$54.81 per hour for Clerical labor. These rates are from the occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been ry.

0 percent will have to repeat this test. Since there are no new respondents estimated, these requirements do not apply.

flows at the control device inlet and outlet or (2) the concentration of HCl exiting the control device. The test her annually or according to an alternative schedule that is approved by the applicable permitting authority, but performance tests are conducted annually.

st and report.

r each emission control device.

ere are no new respondents estimated, these requirements do not apply.

l by the standard.

rformation.

Total Number of Respondents	
Number of sources established in 2012 final rule amendments	100

Respondant Rates

(Source: United States Department of Labor, Bureau of Labor Statistics, June 2017, "Table 2. Civilian Workers, by occupational and industry group.")

Labor Type	Total Compensation (\$/hr)	Loaded Rate (Rate + 110%rate)
Mgmt.	\$71.12	\$149.35
Tech.	\$53.80	\$112.98
Cler.	\$26.10	\$54.81

re to OC: The table from 1821.08 includes burden for revising the O&M plan. However, the rule includes no requirement to get approval for, or to revise, the operation and maintenance plan. The current ICR approval process specifies 40 hours to revise the plan. EPA has reduced the estimate to 20 hours because the burden to revise the plan should be significantly less than the burden to draft the original plan, which is 40 hours, however, EPA may wish to revisit including the burden for this line item

Prev ICR: 35,069 hrs \$3,540,000

Table 2: Average Annual EPA Burden and Cost – NESHAP for Steel Pickling, HCl Process Facilities a

Activity	(A)	(B)	(C)	(D)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year ^a
Report Review				
New Sources				
Notification of applicability ^c	2	1	2	0
Notification of construction/reconstruction ^c	2	1	2	0
Notification of actual startup ^c	2	1	2	0
Notification of special compliance requirements	N/A			
Notification of initial performance test ^c	2	1	2	0
Notification of compliance status ^c	2	1	2	0
Review of initial performance test report ^d	4	1	4	0
Review of repeat initial performance test report ^{d,e}	4	0.2	0.8	0
Existing Sources				
Review of excess emissions report ^f	4	2	8	20
Review of no excess emissions report ^g	2	2	4	80
Review of periodic performance test report ^h	4	1	4	100
Review of waiver application ⁱ	2	1	2	0
TOTAL (rounded) ^j				

Assumptions:

^a We have assumed that there are approximately 100 respondents subject to the standard. We have further assumed in the next three years. Since there are no new respondents estimated, initial performance tests and initial notifications are assumed to be required for all existing sources.

^b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for overhead: Technical (GS-12, Step 1) and \$26.02 Clerical (GS-6, Step 3). These rates are from the Office of Personnel Management.

^c We have assumed that all new sources will be required to meet initial notification requirements. Since there are no new sources estimated, initial notifications are assumed to be required for all existing sources.

^d We have assumed that each respondent will take 4 hours to participate in the performance tests. Since there are no new respondents estimated, initial performance tests are assumed to be required for all existing sources.

- ^e We have assumed that 20 percent of new respondents will have to repeat the performance tests due to failure.
- ^f We have assumed that 20 percent of respondents will report excess emissions on a semiannual basis.
- ^g We have assumed that 80 percent of respondents will report no excess emissions on a semiannual basis.
- ^h Periodic performance tests are submitted at least twice every 5 years (title V permit term), but may be required to assume that all periodic performance tests are conducted annually.
- ⁱ We have assumed that no waiver application is expected.
- ^j Totals have been rounded to 3 significant values. Figures may not add exactly due to rounding.

and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (Renewal)

\$48.08 \$64.80 \$26.02

(E)	(F)	(G)	(H)
Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
160	8	16	\$8,211.20
320	16	32	\$17,254.91
400	20	40	\$21,568.64
0	0	0	\$0
1,010			\$47,000

(GS- 12, step 1) - Tech.
(GS- 13, step 5) - Mgmt.
(GS-6, step 3) - Cler.

Note to OC:
 Error in previous ICR renewal: Si increase in agency burden beca report was missing from this tab this added row, the burden incre to labor rates increasing) would \$25,900.

med that no additional respondent per year will become subject to the regulation cations do not apply.

government overhead expenses: \$64.80 for Managerial (GS-13, Step 5), \$48.08 Management (OPM) "2017 General Schedule", which excludes locality rates of

re no new respondents estimated, these requirements do not apply.

re no new respondents estimated, these requirements do not apply.

Since there are no new respondents estimated, these requirements do not apply.

Required by the permitting authority to be submitted as frequently as annually. We

Hourly Mean Wage	With Fringe & Overhead
30.05	\$48.08
40.5	\$64.80
16.26	\$26.02

Agency Rates
Source: Office
of Personnel
Management
(OPM), 2017
General
Schedule

significant
use this
ole. Without
ease (due
have been

552 \$25,100

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

(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost (B X C)
Flow-meters with high/low alarms	\$830	0	\$0

(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M Costs (E X F)
\$106	100	\$10,600