

Table 1: Annual Respondent Burden and Cost – NESHAP for Coke Oven Pushing, Quenching, and Battery Stack

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person-hours per year (Cx D)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Acquisition, Installation, and Utilization of Technology and Systems	40	1	40	0	0
4. Reporting Requirements					
A. Familiarize with rule requirement	2	1	2	16	32
B. Required activities ^{c, d}					
Method 5 performance test ^{e, c}	40	1.5	60	6.4	384
Startup, shutdown, malfunction plan	40	1	40	0	0
Operation and maintenance plans for by-product coke oven batteries and capture systems and control devices applied to pushing emissions	40	1	40	0	0
Work practice plan for batteries with horizontal flues (one plant)	40	1	40	1	40
Method 9 daily observations for fugitive pushing emissions ^f	3.1	365	1,141	16	18,250
Weekly sampling for total dissolved solids (TSD) ^g	2.3	52	119.6	16	1,913.6
Monthly inspections and maintenance of affected sources, control devices, and continuous parameter monitoring systems ^e	2	12	24	16	384
C. Create information	See 4B				
D. Gather existing information	See 4B				
E. Write report					
Notification of applicability	2	1	2	0	0
Notification of constr./reconstr.	2	1	2	0	0
Notification of anticipated startup	2	1	2	0	0
Notification of actual startup	2	1	2	0	0
Notification of special compliance Requirements	2	1	2	0	0
Compliance extension request	2	1	2	0	0
Notification of performance test ^c	2	1.5	3	0	0
Site-specific test plan	40	1	40	0	0
Notification of compliance status	8	1	8	0	0
NESHAP waiver application	N/A				
Report of performance test ^h	See 4B				
Semiannual compliance reports ^h	40	2	80	16	1280
Quarterly compliance reports for battery stacks ⁱ	12	4	48	11	528
Emergency startup, shutdown, or malfunction reports ^j	4	1	4	1	4
Subtotal for Reporting Requirements					
5. Recordkeeping Requirements					
A. Familiarize with rule requirement	See 4A				

B. Plan activities	3	1	3	0	0
C. Implement activities	12	1	12	0	0
D. Develop record system	3	1	3	0	0
E. Time to enter information	1	52	52	16	832
F. Time to train personnel	3	1	3	0	0
G. Time to adjust existing ways to comply with previously applicable requirements	3	1	3	0	0
H. Time to transmit or disclose information ^k	0.25	2	0.5	16	8
I. Time for audits	N/A				
Subtotal for Recordkeeping Requirements					
TOTAL LABOR BURDEN AND COST (rounded) ¹					
Capital and O&M Cost (rounded) ¹					
GRAND TOTAL (rounded) ¹					

Assumptions:

- ^a There is an average of 16 respondents (i.e., coke plants operating 30 by-product batteries and 20 non-recovery batteries)
- ^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.91 per hour for other labor.
- ^c We have assumed that existing respondents have already comply with initial rule requirements and are in full compliance.
- ^d Monitoring and recordkeeping of operations for respondents include: monthly inspection of capture and control systems.
- ^e The rule requires that every 2.5 years (or 0.4 times per year over the 3 years of the ICR), each control device applied to the process.
- ^f Assumes one hour of observations per day per battery.
- ^g The measuring of the total dissolved solids (TDS) in the make-up water used for quenching is a requirement. In past analyses, this was not required.
- ^h The rules requires the submittal of quarterly compliance reports for all battery stacks. If no deviation occurred and no change in operating conditions, a single report may be submitted for all stacks.
- ⁱ 40 CFR 63.7341(b) requires quarterly reporting for the COMS monitoring opacity of emissions from the stacks on by-product batteries.
- ^j It assumes that one respondent per year will have a startup, shutdown and malfunction (SSM) occurrence that is not major.
- ^k It assumes 15 minutes to transmit recorded information

¹Totals have been rounded to 3 significant values. Figures may not add exactly due to rounding.

s (40 CFR Part 63, Subpart CCCCC) (Renewal)

(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
0	0	\$0
1.6	3.2	\$4,191.74
19.2	38.4	\$50,300.93
0	0	\$0
0	0	\$0
2	4	\$5,239.68
912.5	1,825.0	\$2,390,604.00
95.7	191.4	\$250,666.29
19.2	38.4	\$50,300.93
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
64	128	\$167,669.76
26.4	52.8	\$69,163.78
0.2	0.4	\$523.97
26,238		\$2,988,661

Labor Rates	
Technical	117.92
Management	147.40
Clerical	57.02

Number of Respondents: 16
By-product Batteries 30

Non-recovery Batteries 20

Updated person hrs and # of response 2015 updates: Per Donna Lee Jones, US §
2018 updates: Number of respondents changed

Updated # of respondents

0	0	\$0
0	0	\$0
0	0	\$0
41.6	83.2	\$108,985.34
0	0	\$0
0	0	\$0
0.4	0.8	\$1,047.94
966		\$110,033
27,200		\$3,100,000
		\$143,000
		\$3,240,000

83 responses/yr
326 hr/resp

). We have assumed that there will be no new sources subject to this regulation.

2 per hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are from the United States Department of Labor with periodic requirements including quarterly and semiannual reports. New respondents would have to comply with the following: daily Method 9 observations; weekly sampling for dissolved solids for quenching operations; work practices for batteries; pushing emissions must be sampled by Method 5 for particulate matter. From past analysis, we have determined that there

analysis, we determined there is an average of 2.3 quenching towers per facility.

Continuous monitoring systems were out of control, only a summary report is required. For other affected sources, semiannual product recovery coke ovens, which are present at eleven plants.

Managed according to the SSM plan.

Notes:

updated 9/20/18 to match the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2. Civilian Wc
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Steel Gary Works and US Steel Granite City Works shut down since last ICR period. These 2 facilities operate 5 by-product bat
anges from 17 to 16. Number of batteries updated to 30 by-product and 20 non-recovery per industry input.

f Labor, Bureau of Labor Statistics, June 2018, “Table 2. Civilian Workers, by Occupational and Industry group.” The rates are
initial rule requirements including notifications and performance tests for add-on control devices.
with horizontal flues (one plant); and Method 5 testing for particulate matter.
is an average of 1.5 emission points per respondent that need to be tested. There is an average of 6.4 respondents per year (16*

ial reports are required for any deviation from an emission limitation (including an operating limit), work practice standard, or (

orkers, by occupational and industry group
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teries.

: from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available t

0.4) submitting Method 5 performance test reports.

O&M requirement.

to those employed by private industry.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Coke Oven Pushing, Que

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per plant per year	(C) Hours per plant per year (AxB)	(D) Plants per year ^a	(E) Technical person-hours per year (CxD)
Initial performance test	40	1	40	0	0
Repeat performance test-Retesting preparation	2	1	2	0	0
Repeat performance- Retesting	40	1	40	0	0
Report Review					
Notification of construction/reconstruction	N/A				
Notification of anticipated startup	N/A				
Notification of actual startup	N/A				
Notification of special compliance requirements	N/A				
Notification of initial performance test	2	1	2	0	0
Notification of compliance status ^d	2	1	2	0	0
Review of repeat Method 5 performance test report	8	1	8	6.4	51.2
Review of semi-annual compliance report ^e	8	0.4	3.2	16	51.2
Review of NESHAP waiver application	2	1	2	0	0
Review of quarterly compliance report for battery stacks ^f	1	4	4	11	44
Review of emergency startup, shutdown, and malfunction report ^g	4	1	4	1	4
TOTAL ANNUAL COST ^h					

Assumptions:

- ^a There are an average of 16 respondents (i.e., coke plants operating 30 by-product batteries and 20 non-recovery
- ^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account
- ^c We have assumed that existing sources have complied with the initial rule requirements. New respondents are :
- ^d Every 2.5 years (or about 0.4 times per year, if averaged over the three-year period of ICR), respondents must s
- ^e Sources are required to submit semiannual compliance reports and startup, shutdown and malfunction (SSM) r
- ^f 40 CFR 63.7341(b) requires the submittal of quarterly compliance reports for the COMS monitoring opacity on
- ^g It assumes that one respondent will have a startup, shutdown and malfunction (SSM) occurrence that is not mar
- ^h Totals have been rounded to 3 significant values. Figures may not add exactly due to rounding.

enching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Renewal)

(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
2.56	5.12	\$2,799.28
2.56	5.12	\$2,799.28
0	0	\$0
2.2	4.4	\$2,405.63
0.2	0.4	\$218.69
173		\$8,220

Notes:

Labor Rates	
Technical	48.75 Updated 9/20/18 to m
Management	65.71 Updated 9/20/18 to m
Clerical	26.38 Updated 9/20/18 to m

Adjusted person-hrs and occurances to accurately reflect 1 hr, 4x/year.

batteries). We have assumed that there will be no new sources subject to this regulation.
 t for government overhead expenses: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75
 required to conduct performance test for add-on control equipment, submit initial notifications and prepare startup, shutdo
 ample each emission point using Method 5 for particulate matter and submit a report of results.
 eports if there is an occurrence that is not managed according to the SSM plan.
 i the battery stacks at the eleven coke plants utilizing by-product recovery ovens.
 naged according to the SSM plan.

atch the rates from the Office of Personnel Management (OPM), 2018 General Schedule.
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(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 P
wn and malfunction (SSM) plans.

Personnel Management (OPM) “2018 General Schedule” which excludes locality rates of pay.