

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Integrated Iron and Steel Manufacturing Facilities  
(40 CFR Part 63, Subpart FFFFF) (Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF) (Renewal), EPA ICR Number 2003.07, OMB Control Number 2060-0517.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF) were proposed on July 13, 2001 (66 FR 36835), promulgated on May 20, 2003 (68 FR 27645), and most-recently amended on July 13, 2006 (71 FR 39579). These regulations apply to new and existing sinter plants, blast furnaces, and basic oxygen process furnace shops at integrated iron and steel manufacturing facilities that are major sources of hazardous air pollutants (HAPs) or are co-located at major sources. New facilities include those that commenced either construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart FFFFF.

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.

The term “Affected Public” applies to owners or operators of integrated iron and steel manufacturing facilities. There are approximately 12 integrated iron and steel manufacturing facilities. None of the 12 facilities are owned by either state, or local, or tribal entities, or by the Federal government. All these facilities are owned and operated by privately-owned, for-profit businesses. The ‘burden’ to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF) (Renewal). The ‘burden’ to the Federal Government is attributed entirely 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

Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF) (Renewal).

Based on our consultations with industry representatives, there is an average of 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 12 respondents per year will be subject to these standards. No additional respondents will become subject to these same standards. These estimates were developed in consultation with internal experts at OAQPS, who indicated that several facilities have shut down since the last ICR renewal period.

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 integrated iron and steel manufacturing 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 FFFFF.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in the 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 the 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 either 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 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 FFFFF.

#### **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* (83 FR 24785) on May 30, 2018. 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 the standard, 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 12 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as it was 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 the American Iron and Steel Institute, at (202) 452-7100, and the Association for Iron & Steel Technology, at (724) 814-3000.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for 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 the 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 owners or operators of integrated iron and steel manufacturing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3312 (Steel Works, Blast Furnaces (including Coke Ovens), and Rolling Mills) which corresponds to the North American Industry Classification System (NAICS) 331110 for Iron and Steel Mills and Ferroalloy Manufacturing.

### 4(b) Information Requested

#### (i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF).

A source must make the following reports:

<b>Notifications</b>	
Applicability	§63.5(b), §63.7840(a)
Commencement of construction or reconstruction	§63.9(b)(4), §63.7840(a)
Actual startup	§63.9(b)(4), §§63.7840(b)-(c)
Intention to construct/reconstruct	§§63.9(b)(4)-(5), §63.7840(a)
Compliance dates/extension	§63.9(c), §63.7840(a)
Performance test/opacity observations	§63.9(e), §63.7840(d)-(e)
Compliance status	§§63.9(g)-(h), §63.7840(e)

<b>Reports</b>	
Application for approval of the construction or reconstruction	§63.5(d)(2)

<b>Reports</b>	
of a new major affected source, or reconstruction of a major affected source	
Performance test results	§63.10(d)(2), §63.7840(e)(2)
Operation and maintenance plan	§63.7800(b)
Immediate startup, shutdown, and malfunction report	§63.6(e)(3), §63.7841(c)
Periodic startup, shutdown and malfunction reports	§63.10(d)(5)(i), §63.7841(c)
Progress reports for compliance extension (if applicable)	§63.6(i)(11)
Semiannual report of compliance	§§63.7841(a)-(b)

A source must keep the following records:

<b>Recordkeeping</b>	
Notifications and reports	§63.10(b)(2)(xiv), §63.7842(a)(1)
Startup, shutdown, and malfunction plan/events	§§63.6(e)(3)(iii)-(v), §63.7842(a)(2)
Performance test and opacity observations	§63.10(b)(2)(viii), §63.7842(a)(3)
Continuous monitoring systems	§§63.10(b)(2)(vi)-(xi), §63.8(d)(3), §§63.6(h)(7)(i)-(ii), §63.7842(b)
Visual observations	§63.6(h)(6), §63.7842(c)
Records required to demonstrate continuous compliance	§63.10(b)(2)(vii), §63.7842(d)

### 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**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate any: COMS for opacity for any baghouse or electrostatic precipitator, CPMS for pressure drop for any baghouse, or CPMS for pressure drop and water flow rate for any venturi scrubber.
Perform initial performance test, Reference Method 5, 9, or 9071B tests, 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 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.

<b>Agency Activities</b>
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Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.
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### **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 standards. 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**

The majority of respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of these regulations. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

### **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 Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF) (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 these recordkeeping and reporting requirements is estimated to be 11,800 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 type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Leak detectors	\$9,000	0	0	\$2,389	12	\$28,668
Continuous opacity monitors <sup>a</sup>	\$37,000	0	0	\$8,000	3	\$24,000
<b>Total (rounded)<sup>b</sup></b>						<b>\$52,700</b>

<sup>a</sup> We assume 3 respondents have continuous opacity monitors.

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

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$52,700. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$52,700. These are recordkeeping 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 \$16,000.

This cost is based on the average hourly labor rate as follows:

Managerial	\$65.71 (GS-13, Step 5, \$41.07 + 60%)
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 government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP

for Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF) (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 12 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 12 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	12	0	0	12
2	0	12	0	0	12
3	0	12	0	0	12
Average	0	12	0	0	12

<sup>1</sup> 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 12.

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
Notification of applicability	0	1	0	0
Notification of compliance status	0	1	0	0
Notification of intent to construct a major source and review application	0	1	0	0

<b>Total Annual Responses</b>				
Notification of actual startup	0	1	0	0
Notification of performance test	0	1	0	0
Report of performance test results	12	0.4	0	4.8
Semiannual compliance reports	12	2	0	24
Startup, shutdown, and malfunction report	1	1	0	1
			Total	30

Note: We assume respondents submit performance test reports once every 2.5 years; therefore, the reporting frequency is  $1 / 2.5 = 0.4$ .

The number of Total Annual Responses is 30.

The total annual labor costs are \$1,340,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF) (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 11,800 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF) (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 393 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$52,700. 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 336 labor hours at a cost of \$16,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF) (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 a decrease in burden from the most-recently approved ICR. The decrease in burden is due to a decrease in the number of respondents due to more accurate estimates of existing and anticipated new sources. The decrease in the number of sources also results in a decrease in the operation and maintenance costs. The overall result is a decrease in burden hours and costs.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 393 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-2011-0271. 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-2011-0271 and OMB Control Number 2060-0517 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 Integrated Iron and Steel Manufacturing Facilities 40 CFR Part 63, Subpart FFFFF (Renewal)**

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>	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 <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with rule requirements	2	1	2	12	24	1.2	2.4	\$3,143.81
B. Required activities <sup>c</sup>								
i. Method 5 performance test <sup>d</sup>	40	7.6	304	12	3,648	182.4	364.8	\$477,858.82
ii. Method 9 performance test <sup>d</sup>	8	3.6	28.8	12	345.6	17.28	34.56	\$45,270.84
iii. Method 9071B performance test	2	365	730	4	2,920	146.0	292	\$382,496.64
iv. Startup, shutdown, malfunction plan <sup>e</sup>	40	1	40	0	0	0	0	\$0
v. Inspection and maintenance of capture systems and control devices	2	12	24	12	288	14.4	28.8	\$37,725.70
C. Gather existing information	See 4D, 4E							
D. Write report <sup>c</sup>								
i. Notification of applicability <sup>e</sup>	2	1	2	0	0	0	0	\$0
ii. Notification of compliance status <sup>e</sup>	2	1	2	0	0	0	0	\$0
iii. Notification of intent to construct a major source and review application <sup>e</sup>	4	1	4	0	0	0	0	\$0
iv. Notification of initial construction/reconstruction <sup>e</sup>	4	1	4	0	0			\$0
v. Notification of actual startup <sup>e</sup>	4	1	4	0	0	0	0	\$0
vi. Notification of performance test <sup>e</sup>	4	1	4	0	0	0	0	\$0

vii. Reports of performance test results	See 3B, 4E							
viii. Semiannual compliance reports	40	2	80	12	960	48	96	\$125,752.32
ix. Startup, shutdown, malfunction report <sup>f</sup>	4	1	4	1	4	0.2	0.4	\$523.97
<b>Subtotal for Reporting Requirements</b>						<b>9,418</b>		<b>\$1,072,772</b>
4. Recordkeeping Requirements								
A. Familiarize with rule requirements	See 3A							
B. Plan activities <sup>e</sup>	10	1	10	0	0	0	0	\$0
C. Implement activities	See 3B							
D. Develop record system	N/A							
E. Time to enter and transmit information <sup>g</sup>	3.25	52	169	12	2,028	101.4	202.8	\$265,651.78
F. Time to train personnel <sup>e</sup>	3	1	3	0	0	0	0	\$0
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>2,332</b>		<b>\$265,652</b>
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>h</sup></b>						<b>11,800</b>		<b>\$1,340,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>h</sup></b>								<b>\$52,700</b>
<b>GRAND TOTAL (rounded) <sup>h</sup></b>								<b>\$1,390,000</b>

**Assumptions:**

<sup>a</sup> There are approximately 12 existing sources currently subject to this rule. There will be no additional new source that will become subject to the rule each year over the three-year period of this ICR.

<sup>b</sup> 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.

<sup>c</sup> Monitoring and recordkeeping of operations for respondents will include monthly inspection of capture and control systems; daily testing of oil content for the sinter plant feed (4 plants [from the composite of three samples taken at 8-hour intervals]) to compute the 30-day rolling average oil content for each operating day; and every 2.5 years, each emission point must be sampled by Method 5 for particulate matter and Method 9 for opacity observations to determine the opacity of fugitive emissions

<sup>d</sup> We have assumed that there is an average of 7.6 emission points per respondent that need to be sampled using Method 5 and 3.6 emission points per respondent to need to be sampled using Method 9.



<sup>e</sup> These requirements are one-time requirements that apply to new respondents. There are no new respondents estimated over the 3-year period of this ICR.

<sup>f</sup> We have assumed that one respondent per year will have at least one startup, shutdown, or malfunction (SSM) that is not managed according to the SSM plan.

<sup>g</sup> We have assumed that it takes each respondent approximately 3.25 hours per week to record and transmit information.

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

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Integrated Iron and Steel Manufacturing Facilities 40 CFR Part 63, Subpart FFFFF) (Renewal)**

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ <sup>b</sup>
New Respondents <sup>c</sup>								
i. Notification of compliance status	4	1	4	0	0	0	0	\$0
ii. Notification of intent to construct a major source and review application	4	1	4	0	0	0	0	\$0
iii. Notification of start of construction	2	1	2	0	0	0	0	\$0
iv. Notification of actual startup	2	1	2	0	0	0	0	\$0
v. Notification of initial performance test and test plan	4	1	4	0	0	0	0	\$0
Existing Respondents					0	0	0	\$0
i. Performance test report for Method 5 and Method 9 <sup>d</sup>	20	0.4	8	12	96	4.8	9.6	\$5,248.66
ii. Review semiannual compliance reports <sup>e</sup>	8	2	16	12	192	9.6	19.2	\$10,497.31
iii. Review of startup, shutdown, malfunction reports <sup>f</sup>	4	1	4	1	4	0.2	0.4	\$218.69
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>g</sup></b>						<b>336</b>		<b>\$16,000</b>

**Assumptions:**

<sup>a</sup> There are approximately 12 existing sources currently subject to this rule. There will be no additional new source that will become subject to the rule each year over the three-year period of this ICR.

<sup>b</sup> 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.

<sup>c</sup> These requirements are one-time requirements that apply to new respondents. There are no new respondents estimated over the 3-year period of this ICR.

<sup>d</sup> Every 2.5 years (or about 0.4 times per year, if averaged over the three-year period of ICR), respondents must sample each emission point using Method 5 for particulate matter and Method 9 for opacity observations and submit a report with results.

<sup>e</sup> Sources are required to submit semiannual compliance reports.

<sup>f</sup> We have assumed that one respondent per year will have at least one startup, shutdown, or malfunction (SSM) that is not managed according to the SSM plan.

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