

<b>Activity</b>	<b>(A) Person hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>	<b>(C) Person hours per respondent per year (AxB)</b>
1. Applications			
2. Survey and Studies			
3. Acquisition, Installation, & Utilization of Tech. & Systems			
4. Reporting Requirements			
A. Familiarize with rule requirements <sup>b</sup>	1	1	1
B. Required Activities:			
i. Quarterly control equipment inspection <sup>c</sup>	1	4	4
ii. Daily cyclone performance measures	0.1	365	36.5
C. Create information			
D. Gather existing information			
E. Write report			
Initial Notification <sup>b</sup>	0.5	1	0.5
Notification of Compliance Status <sup>b</sup>	1	1	1
Annual Compliance Certification	1	1	1
<b>Subtotal for Reporting Requirements</b>			
5. Recordkeeping Requirements			
A. Familiarize with rule requirements <sup>b</sup>	See 4A		
B. Plan activities			
C. Implement activities			
D. Develop record system			
E. Time to enter information			
F. Time to train personnel			
G. Time to transmit or disclose information <sup>d</sup>	0.1	1	0.1
I. Time for audits	0.1	1	0.1
<b>Subtotal for Recordkeeping Requirements</b>			
<b>TOTAL LABOR BURDEN AND COSTS (rounded)<sup>e</sup></b>			
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>e</sup></b>			
<b>GRAND TOTAL(rounded)<sup>e</sup></b>			

<sup>a</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.9 Department of Labor, Bureau of Labor Statistics, June 2018, Table 2. Civilian Workers, by occupational and industry group benefit packages available to those employed by private industry.

<sup>b</sup> We have assumed that it will take one hour for each respondent to familiarize with regulatory requirements, one hour to

<sup>c</sup> The NESHAP requires that existing and new facilities with a daily production level greater than 50 tons per day install a cyclone to monitor inlet flow rate, inlet velocity, pressure drop, or amperage. We estimate 1,284 of the 1,800 facilities

<sup>d</sup> We have assumed that it will take one hour for each respondent to transmit or disclose information.

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

117.92

147.4

57.02

(D) Respondents per year	(E) Technical person hours per year (CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ <sup>a</sup>
1,800	1,800	90	180	\$235,785.60
1,284	5,136	256.8	513.6	\$672,774.91
1,284	46,866	2343.3	4686.6	\$6,139,071.07
0	0	0	0	\$0
0	0	0	0	\$0
1,800	1,800	90	180	\$235,785.60
		<b>63,942</b>		<b>\$7,283,417.18</b>
1,800	180	9	18	\$23,578.56
0	0	0	0	\$0
		<b>207</b>		<b>\$23,578.56</b>
		<b>64,100</b>		<b>\$7,310,000</b>
				<b>\$37,200</b>
				<b>\$7,350,000</b>

02 per hour for Technical labor, and \$57.02 per hour for Clerical labor. These rates are from the United States Bureau of Labor Statistics. The rates are from column 1, Total compensation. The rates have been increased by 110 percent to account for the

to complete the initial notification, and one hour to complete the Notification of Compliance Status.

and operate a cyclone to reduce emissions from pelleting operations. These facilities are required to install a device on all facilities that have production greater than 50 tons per day.



36 hr/response

Previously: 64,100 hr, \$6,490,000

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (AxB)	(D) Plants per year
Report Review				
Initial Notification <sup>b</sup>	1	1	1	0
Notification of Compliance Status <sup>c</sup>	2	1	2	0
Annual Compliance Certification	2	1	2	1,800
<b>TOTAL BURDEN AND COST <sup>d</sup></b>				

<sup>a</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for gov

<sup>b</sup> We have assumed that it will take 1 hour to review the initial notification of applicability report.

<sup>c</sup> We have assumed that it will take 2 hours to review the initial notification of compliance status report.

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

EPA rate

<b>(E) Technical person hours per year (CxD)</b>	<b>(F) Management person hours per year (Ex0.05)</b>	<b>(G) Clerical person hours per year (Ex0.1)</b>	<b>(H) Cost, \$ (a)</b>
0	0	0	\$0
0	0	0	\$0
3,600	180	360	\$196,824.60
<b>4,140</b>			<b>\$197,000</b>

ernment overhead expenses: \$65.71 Managerial rate (GS-13, Step 5, \$41.07 x 1.6), \$48.75 Technical rate (GS-12, Step 1, \$30

48.75            65.71            26.38

.47 x 1.6), and \$26.38 Clerical rate (GS-6, Step 3, \$16.49 x 1.6). These rates are from the Office of Personnel Management (OPM) 2



'014 General Schedule, which excludes locality rates of pay.

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

(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M
Cyclone Monitor	\$295	0	\$0	\$29	1,284
<b>Total (rounded)</b>					

(G)
Total O&M,
(E X F)
\$37,236
<b>\$37,200</b>