

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels
(40 CFR Part 60, Subparts AA and AAa) (Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal), EPA ICR Number 1060.18, OMB Control Number 2060-0038.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subpart AA) were proposed on October 21, 1974, promulgated on September 23, 1975, and most recently-amended on February 22, 2005. These regulations apply to electric arc furnaces and dust-handling systems that commenced construction, modification, or reconstruction either after October 21, 1974 or on/or before August 17, 1983 at steel plants that produce carbon, alloy, or specialty steels. In addition, the New Source Performance Standards (NSPS) for these regulations (40 CFR Part 60, Subpart AAa) were proposed on August 17, 1983, promulgated on October 31, 1984, and most recently-amended on February 22, 2005. These latter regulations apply to electric arc furnaces, argon-oxygen decarburization vessels, and dust-handling systems that commenced construction, modification, or reconstruction after August 17, 1983 at steel plants that produce carbon, alloy, or specialty steels. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 60, Subparts AA and AAa.

In general, all NSPS 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 NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain the file for at least two 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 “Affected Public” are steel plants that produce carbon, alloy, or specialty steels. The “burden” to the Affected Public may be found below at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon

Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal). The “burden” to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and can be found below at the end of this document in Table 2: Average Annual EPA Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal). There are approximately 100 steel plants, which are owned and operated by the steel industry. None of the 100 steel plants in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA requirements.

Based on our consultations with industry representatives, there are an average of two affected facilities 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, an average of approximately 100.33 respondents per year will be subject to these standards, and one additional respondent will become subject to these same standards over the three-year period of this ICR (0.33 respondents per year). This results in an annual average of 100.66 respondents per year.

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 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years. 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, particulate matter (PM) emissions from electric arc furnaces, argon-oxygen decarburization vessels, and dust handling systems either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subparts AA and AAa.

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 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 the standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of these regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the 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 60, Subparts AA and AAa.

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 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 100.66 respondents will be subject to these same 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 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 both the Steel Manufacturers Association (SMA), at (202) 296-1515; and the Specialty Steel Industry of North America (SSINA), at (202) 342-8630.

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 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.

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 steel plants that produce carbon, alloy, or specialty steels. 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) code 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 NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa).

A source must make the following reports:

Notifications	
Notification of date of construction/reconstruction	§60.7(a)(1)
Notification of demonstration of compliance with the particulate matter standard	§60.276(c)
Notification of actual startup	§60.7(a)(3)
Notification of initial performance test	§60.8(d)

Notifications	
Notification of demonstration of the continuous monitoring system performance commences	§60.7(a)(5)
Notification of procedures to be followed during performance tests if emissions is combined with non-affected facilities	§60.276(b), §60.276a(e)
Physical or operational change	§60.7(a)(4)
Use of opacity or visible emissions observations during performance test	§§60.7(a)(6)-(7)

Reports	
Report of performance test results	§60.8(a), §60.276(c), §60.276a(f)
Provide semiannual reports of operational values that exceed (i.e., furnace static pressure, fan motor amperes) or are below (i.e., flow rates) those established during the performance test, and of all shop opacity observations in excess of the emission limit	§60.7(c), §60.276(a), §60.276(d), §60.276a(b), §60.276a(c), §60.276a(g)

A source must keep the following records:

Recordkeeping	
Startups, shutdowns, and malfunctions, periods where the continuous monitoring system is inoperative.	§60.7(b)
Furnace static pressure measurements or daily observations of shop opacity by a certified visible emission observer if EAF is equipped with a direct shell evacuation system (DEC).	§60.273(d), §60.274(f), §60.276(d), §60.274a(f), §60.274a(g)
Records for bag leak detection systems.	§60.276(e), §60.276a(h)
Daily records of operational parameters, such as time and duration of each charge, time and duration of each tap, flow rate data, pressure data.	§§60.274(a)-(b), §60.274a(b)
Note deficiencies during monthly control system fan motor amperes operational status check.	§60.274(f), §60.274a(f)
Maintain a file of all measurements including, performance test measurements, and all other information required by this part recorded	§60.7(f), §60.276a(a)

Recordkeeping	
in a permanent file suitable for inspection. The file shall be retained for at least two years.	
Record of time and duration of each charge and tap (NSPS subpart AA only).	§60.274(a)

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

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate COMS for opacity, or CPMS for static pressure, pressure drop and liquid supply pressure for the baghouse or wet scrubber.
Perform initial performance test, Reference Method 1, 2, 5, 5D, 9 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 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:

Agency Activities
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 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 these regulations must be retained by the owner/operator for two years.

5(c) Small Entity Flexibility

The majority of respondents are small entities (i.e., small businesses). The recordkeeping and reporting requirements are the same for both small and large entities (mini-mills), since the process operations and the types of control equipment employed by them are similar, independent of their size. However, EPA reduced the reporting frequency for this information from quarterly to semiannually in a December 1990 *Federal Register* notice to reduce the impact of reporting burden on small businesses. 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.

In EPA's 1979 Review of Standards of Performance for Electric Arc Furnaces in the Steel Industry, it was noted that approximately 84 percent of the facilities subject to these standards were small entities¹. It is assumed that 84 percent of the current respondents subject to these same standards (or 84 of the 100 respondents) are small entities.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below at the end of this document in Table 1: Annual Respondent Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (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 each of the subparts 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 62,700 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 NSPS 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%)

¹ *Review of Standards of Performance for Electric Arc Furnaces in Steel Industry*. EPA-450 3-79-033. October, 1979.

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 standards 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 these regulations. 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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(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)
Continuous Opacity Monitors ¹	\$25,000	0	\$0	\$7,500	26.82	\$201,150
Furnace Static Pressure Monitors ²	\$300	0.33	\$99	\$0	52.04	\$0
Volumetric Flow Rate Monitor ³	\$18,000	0.33	\$5,940	\$0	100.66	\$0
TOTAL			\$6,040			\$201,000

¹ Assumes that 40 percent of all respondents are using negative baghouses (40.3). Of these respondents, 66 percent (26.82 respondents) use COMS to measure stack emissions and 33 percent (13.4 respondents) have elected to use the alternative option of BLDS monitoring coupled with visible emissions observations instead of using COMS.

² Assumes 51.7 percent (52.04) of all respondents have elected to comply with the fugitive emissions monitoring requirements by measuring the furnace static pressure continuously. The operating and maintenance costs associated with the pressure monitors are negligible.

³ All respondents (100.66) are required to install flow rate monitors as part of the monitoring of operations rule requirements. The operating and maintenance costs associated with the flow monitors are negligible.

Note: 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 \$6,040. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$201,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to this industry over the next three years of the ICR is estimated to be \$207,000. These are the record-keeping 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 such includes 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 \$88,700.

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 Federal government employees. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal).

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, there are 100 sources currently subject to these standards, and we expect one additional source to become subject over the three-year period of this ICR. On average over the next three years, approximately 100.33 existing respondents will be subject to these standards. It is estimated that an additional 0.33 respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 100.66 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 ¹	(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	0.33	100.0	0	0	100.33
2	0.33	100.33	0	0	100.66
3	0.33	100.66	0	0	101
Average	0.33	100.33	0	0	100.66

¹ 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 100.66.

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 actual startup	0.33	1	0	0.33
Notification of construction/modification	0.33	1	0	0.33
Notification of performance test	0.33	1	0	0.33
Reports of performance test results	0.33	1.05	0	0.35
Semiannual reports	100.66	2	0	201.3
			Total	203

The number of Total Annual Responses is 203 (rounded).

The total annual labor costs are \$7,140,000.00 (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for both the respondents and the Agency are shown below in Tables 1 and 2 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 62,700 hours (rounded). Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (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 309 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$207,000.00 (rounded). 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 1,870 labor hours at a cost of \$88,700; see below in Table 2: Average Annual EPA Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (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 an adjustment increase in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The adjustment increase in ‘burden’ from the most recently-approved ICR is due to an increase in the number of new or modified sources, which is based on an assumption of continued growth in the industry. There is also an adjustment increase in capital and operation and maintenance costs due

to the increase in the number of respondents.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 309 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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-2012-0653. 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-2012-0653 and OMB Control Number 2060-0038 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 – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal).

Burden Item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Respondent Hours per Occurrence	Number of Occurrences per Respondent per Year	Hours per Respondent per Year (A x B)	Number of Respondents per Year ^a	Technical Hours per Year (C x D)	Management Hours per Year (E x 0.05)	Clerical Hours per Year (Ex0.1)	Total Labor Costs per Year, \$ ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Read and understand rule requirements	1	1	1	100.66	100.66	5.033	10.066	\$13,185.65
B. Required activities								
Initial Performance tests ^c	364	1	364	0.33	121.212	6.0606	12.1212	\$15,877.80
Repeat Performance tests ^c	364	0.05	18.2	0.33	6.0606	0.30	0.61	\$793.89
Monitoring of operations and emissions ^{d,e}	-----See 4E-----							
D. Gather Existing Information	-----See 3B and 4E-----							
E. Write report								
Notification of construction/modification	2	1	2	0.33	0.666	0.0333	0.0666	\$87.24
Notification of actual startup	2	1	2	0.33	0.666	0.0333	0.0666	\$87.24
Notification of initial performance test	2	1	2	0.33	0.666	0.0333	0.0666	\$87.24
Reports of performance test results	-----See 3B-----							
Semiannual reports ^f	16	2	32	100.66	3221.12	161.056	322.112	\$421,940.95
Subtotal for Reporting Requirements						3,969		\$452,060
4. Recording Requirements								
A. Read and understand rule requirements	-----See 3A-----							

B. Plan activities	-----See 3B-----							
C. Implement activities	-----See 3B-----							
D. Develop record system	N/A							
E. Time to enter and transmit information:								
Records of daily monitoring of operations ^d	0.75	350	262.5	100.66	26423.25	1321.1625	2642.325	\$3,461,234.36
Records of daily emissions monitoring by a certified observer ^{e, h}	0.5	350	175	48.62	8508.2865	425.41	850.83	\$1,114,517.47
Records of COMS ^{g, i}	0.5	350	175	26.82	4692.7692	234.64	469.28	\$614,715.22
Records of BLDS ^{h, i}	0.5	350	175	13.45	2353.4308	117.67	235.34	\$308,280.61
Records of static pressure on furnace ^h	0.5	350	175	52.04	9107.2135	455.36	910.72	\$1,192,972.11
F. Time to train personnel	N/A							
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						58,748		\$6,691,720
Total Labor Burden and Cost (rounded)^j						62,700		\$7,140,000
Total Capital and O&M Cost (rounded)^j								\$207,000
Grand Total (rounded)^j								\$7,350,000

Assumptions:

^a We have assumed that there are an annual average of 100.33 sources currently subject to the NSPS, subparts AA and AAa. We have further assumed that one minimill will become subject to the standard over the three-year period of this ICR (0.33 new respondents per year). Therefore, the average number of respondents per year is estimated to be 100.66.

^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 We have assumed that existing sources are in compliance with initial rule requirements including the initial performance test and notification requirements. We have assumed that 5 percent of the sources would repeat performance tests due to failure.

^d Daily monitoring of operations includes time and duration of each charge, time and duration of each tap, flow rate data and pressure data. In addition, sources

are required to conduct monthly operational status checks of the equipment (e.g., physical appearance, pressure sensors, dampers, damper switches).

^e Daily emissions monitoring includes stack emissions monitoring using a continuous opacity monitor if the source has an EAF equipped with a direct shell evacuation system (DEC) and uses a negative pressure baghouse and has not elected the alternative option. In addition, the source is required to conduct fugitive emissions monitoring using a furnace static pressure monitoring device or by electing to perform shop opacity observations using a certified visible emissions observer, if the source has an EAF equipped with a DEC.

^f Sources are required to provide semiannual reports of opacity observations and operational values (i.e., furnace static pressure, fan motor amperes) that exceed or are below (i.e, flow rates) those established during the performance test, and of all shop opacity observations in excess of the emission limit.

^g We have assumed that the new source will equipped its EAFs with a DEC system and use a positive pressure baghouse, and therefore, will not be required to install a continuous opacity monitor (COMS).

^h We have assumed that approximately 51.7 percent of the respondents (or 52.04 respondents) will choose to comply with the fugitive emissions monitoring requirements by measuring the furnace static pressure continuously and 48.3 percent (48.62 respondents) will choose the alternative option of daily opacity shop observations by a certified visible emission observer couple with the use of bag leak detection systems (BLDS).

ⁱ We have assumed that approximately 40 percent of respondents use negative pressure baghouses. Of these, 66.6 percent (26.82 respondents) use COMS to measure stack emissions and 33.3 percent (13.45 respondents) have elected to use the alternative option of using BLDS monitoring couple with visible emissions observations instead of using COMS.

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

Table 2: Average Annual EPA Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal).

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA Hours per Occurrence	Number of Occurrences per Plant Per Year	EPA Hours per Year (AxB)	Plants per Year ^a	Technical Hours per Year (CxD)	Management Hours per Year (Ex0.05)	Clerical Hours per Year (Ex0.1)	Costs per Year, \$ ^b
Notification of construction/modification	2	1	2	0.33	0.666	0.0333	0.0666	\$36.41
Notification of actual startup	1	1	1	0.33	0.333	0.02	0.03	\$18.21
Notification of performance test ^c	0.5	1.05	0.525	0.33	0.174825	0.01	0.02	\$9.56
Initial performance test	24	1	24	0.33	7.992	0.40	0.80	\$436.95
Repeat Performance test ^c	24	0.05	1.2	0.33	0.3996	0.02	0.04	\$21.85
Review Performance Test results ^c	8	1.05	8.4	0.33	2.7972	0.14	0.28	\$152.93
Notification of COMS Demonstration	0.5	1	0.5	0.33	0.1665	0.01	0.02	\$9.10
Semiannual reports	8	2	16	100.66	1610.56	80.528	161.056	\$88,054.95
TOTAL (rounded)^d						1,870		\$88,700

Assumptions

^a We have assumed that there are an annual average of 100.33 sources currently subject to the NSPS, Subparts AA and AAa. We have further assumed that one minimill will become subject to the standard over the three-year period of this ICR (0.3 new respondents per year). Therefore, the average number of respondents per year is estimated to be 100.66.

^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 We have assumed that 5 percent of the sources would repeat performance tests due to failure.

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