

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting Requirements			
A. Familiarization with rule requirements	2	1	2
B. Required activities <sup>c</sup>			
i. Method 5 performance test <sup>d</sup>	40	8.9	356
ii. Method 9 performance test <sup>d</sup>	8	3.9	31.2
iii. Method 9071B performance test <sup>d</sup>	2	365	730
iv. Method 29 performance test <sup>d</sup>	8	6.3	50.4
v. Prepare scrap plan/certify compliance <sup>d</sup>	4	1	4
vi. Inspection and maintenance of capture systems and control devices	2	12	24
C. Gather existing information	See 4D, 4E		
D. Write report <sup>c</sup>			
i. Notification of applicability <sup>e</sup>	2	1	2
ii. Notification of compliance status <sup>e</sup>	2	1	2
iii. Notification of intent to construct a major source and review application <sup>e</sup>	4	1	4
iv. Notification of initial construction/reconstruction <sup>e</sup>	4	1	4
v. Notification of actual startup <sup>e</sup>	4	1	4
vi. Notification of performance test <sup>e</sup>	4	1	4
vii. Reports of performance test results	See 3B, 4E		
viii. Semiannual compliance reports	40	2	80
ix. Report of performance test (through CEDRI using ERT) <sup>f</sup>	8	1	8
<b>Subtotal for Reporting Requirements</b>			
4. Recordkeeping Requirements			
A. Familiarization with rule requirements	See 3A		
B. Plan activities <sup>e</sup>	10	1	10
C. Implement activities	See 3B		
D. Develop record system/maintain records <sup>g</sup>	4	1	4
E. Time to enter and transmit information	See 3D ix.		
F. Time to train personnel <sup>e</sup>	3	1	3
G. Time for audits	N/A		
<b>Subtotal for Recordkeeping Requirements</b>			
<b>TOTAL LABOR BURDEN AND COST (unrounded)</b>			
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>h</sup></b>			
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>h</sup></b>			
<b>GRAND TOTAL (rounded) <sup>h</sup></b>			

## Assumptions:

<sup>a</sup> There are approximately 11 existing sources currently subject to this rule. We estimate there will be no additional new sources subject to this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$139.63 per hour for Executive, Administrative, and Managerial labor; \$119.63 per hour for other labor. Rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2018, "Table 2. Civilian Workers' Compensation." The rates have been increased by 110% to account for the benefit packages available to those employees.

<sup>c</sup> Monitoring and recordkeeping of operations for respondents will include monthly inspection of capture and control systems (from the composite of three samples taken at 8-hour intervals) to compute the 30-day rolling average oil content for each baghouse emission point must be sampled by Method 5 for particulate matter, Method 9 for opacity observations to determine the opacity of fugitive dust. Each baghouse emission point must be sampled by Method 5 for particulate matter, Method 9 for opacity observations for mercury includes using Method 29 or preparing scrap plan/certify annually.

<sup>d</sup> We have assumed that there is an average of 8.9 (98/11) emission points per respondent that need to be sampled using Method 9; 4 emissions points per respondent that need to be sampled using Method 9071B (3 facilities with sinters) that need to be sampled using Method 29. We have assumed Method 29 mercury add-on costs to Method 5 for PM of \$63.7791 with a Method 29 stack test per \$63.7825(a)-(g) and 11 facilities will choose to comply with §63.7791.

<sup>e</sup> These requirements are one-time requirements that apply to new respondents. There are no new respondents estimated. Submittal of performance test data through the EPA's CEDRI in EKI format is estimated to require 8 hours annually, to minimize emissions.

<sup>f</sup> We have assumed that it takes each respondent approximately 4 hours to develop a record system for Scrap Plan Cert

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

	\$119.47	\$139.63	\$58.15	Labor Cost Per Hour
(D)	(E)	(F)	(G)	(H)
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>
11	22	1.1	2.2	\$2,910
3.7	1,305	65.3	130.5	\$172,650
3.7	114.4	5.72	11.44	\$15,131
4	2,920	146.0	292	\$386,215
0	0	0	0	\$0
11	44	2.2	4	\$5,820
11	264	13.2	26.4	\$34,918
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0			\$0
0	0	0	0	\$0
0	0	0	0	\$0
11	880	44	88	\$116,394
11	88	4	9	\$11,639
	<b>6,483</b>			<b>\$745,677</b>
0	0	0	0	\$0
11	44	2.2	4.4	\$5,820
0	0	0	0	\$0
	<b>51</b>			<b>\$5,820</b>
				<b>\$751,496</b>
	<b>6,500</b>			<b>\$750,000</b>
				<b>\$50,300</b>
				<b>\$800,000</b>

No. of responses
0
0
0
0
0
0
0
0
0
0
0
22
11
33

Hours per response
197

v source that will become subject to the rule each year over the 3-year period of

.47 per hour for Technical labor, and \$58.15 per hour for Clerical labor. These Workers, by Occupational and Industry group.” The rates are from column 1, employed by private industry.

systems; daily testing of oil content for the sinter plant feed [3 plants, 4 strands each operating day; and every 2.5 years, each non-baghouse emission point fugitive emissions; and once during each term of their title V operating permit, to determine the opacity of fugitive emissions (3.7=11/3 plants). Compliance

§ Method 5; 3.9 (43/11) emission points per respondent that need to be sampled per plants, 1 facility has 2 strands); 6.3 (69/11) emission points per respondent \$23,000 per test. We have estimated that 0 (zero) facilities will choose to 3.7791 using the NVMSRP per §63.7825(h).

d over the 3-year period of this ICR.  
includes keeping records of failures to meet the standards and the actions taken  
ify and maintain records.

**Table 2: Average Annual EPA Burden and Cost – Average Annual EPA Burden and Cost – NI**

Activity	(A)	(B)	(C)	(D)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>
New Respondents <sup>c</sup>				
i. Notification of compliance status	4	1	4	0
ii. Notification of intent to construct a major source and review application	4	1	4	0
iii. Notification of start of construction	2	1	2	0
iv. Notification of actual startup	2	1	2	0
v. Notification of initial performance test and test plan	4	1	4	0
Existing Respondents				
i. Performance test report for Method 5 and Method 9 <sup>d</sup>	15	0.4	6	3.7
ii. Review semiannual compliance reports <sup>e</sup>	6	2	12	11
iii. Scrap Plan Certify	2	1	2	11
Subtotals Labor Burden and Cost				
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>g</sup></b>				

**Assumptions:**

<sup>a</sup> There are approximately 11 existing sources currently subject to this rule. We expect there will be no additional new sources subject to 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 employees (GS-12, Step 1, \$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, \$16.44 + 60%) from the “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 to be subject to this ICR.

<sup>d</sup> Every 2.5 years (or about 0.4 times per year, if averaged over the 3-year period of ICR), respondents must sample each source and submit an electronic report to CEDRI with results.

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

<sup>f</sup> We have assumed that each facility per year will submit their scrap plan certification for EPA review.

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

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

\$48.75	\$65.71	\$26.38	Labor Cost per Hour
(E)	(F)	(G)	(H)
Technical person- hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ <sup>b</sup>
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
22	1.1	2.2	\$1,203
132	6.6	13.2	\$7,217
22	1.1	2.2	\$1,203
202			\$9,623
<b>202</b>			<b>\$9,600</b>

ource that will become subject to the rule each year over the 3-year period of

overnment overhead expenses: Managerial rate of \$65.71 (GS-13, Step 5, 9 + 60%). These rates are from the Office of Personnel Management (OPM)

ver the 3 year period of this ICR.

emission point using Method 5 for particulate matter, Method 9 for opacity

(A)	(B)	(C)	(D)	(E)	(F)
<b>Continuous Monitoring Device</b>	<b>Capital/Startup Cost for One Respondent</b>	<b>Number of New Respondents</b>	<b>Total Capital/Startup Cost, (B X C)</b>	<b>Annual O&amp;M Costs for One Respondent</b>	<b>Number of Respondents with O&amp;M</b>
Leak detectors	\$9,000	0	0	\$2,389	11
Continuous opacity monitors	\$37,000	0	0	\$8,000	3
<b>TOTAL</b>					

<b>(G)</b>
<b>Total O&amp;M,</b>
\$26,279
\$24,000
<b>\$50,300</b>