

Table 1: Annual Respondent Burden and Cost – NESHAP for Iron and Steel Foundries (40 CFR

Burden Item	(A) Technical person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Technical person-hours per respondent per year (C=AxB)	(D) Respondents per year ^a
1. Applications	N/A			
2. Surveys and studies	N/A			
3. Reporting requirements				
a. Familiarize with regulatory requirements ^c	2	1	2	45
b. Required activities ^d				
i. Initial performance tests ^e	70	3.8	266	0
ii. Follow-up performance tests	70	0.8	56	0
iii. VOC CEMS performance tests ^e	N/A			
iv. Startup, shutdown, malfunction plan	34	1	34	0
v. Operation and maintenance plan	72	1	72	0
vi. Scrap selection/inspection plan ^d	10	1	10	0
vii. Scrap inspection ^f	0.5	350	175	45
viii. Monthly inspections of capture systems, maintenance of control devices and monitoring systems, and mould vent ignition plan ^f	2	12	24	18
c. Create information	See 3B			
d. Gather existing information	See 3B			
e. Write report				
i. Notification of applicability ^d	2	1	2	0
ii. Notification of construction/reconstruction ^d	2	1	2	0
iii. Notification of actual startup ^d	2	1	2	0
iv. Notification of special compliance requirements ^d	N/A			
v. Compliance extension request ^d	2	1	2	0
vi. Notification of performance test ^d	2	3.8	7.6	0
vii. Site-specific test plan ^d	20	3.8	76	0
viii. Notification of CEMS performance evaluation ^d	60	1	60	0
ix. CEMS QA plan ^d	40	1	40	0
x. Notification of compliance status ^d	8	1	8	0
xi. NESHAP waiver application	N/A			
xii. Report of performance test	See 3B			
xiii. Semiannual compliance reports ^g	16	2	32	45
xiv. Startup, shutdown, malfunction reports ^h	4	1	4	1

Subtotal for Reporting Requirements				
4. Recordkeeping requirements				
a. Familiarize with regulatory requirements ^c	See 3A			
b. Plan activities	3	1	3	0
c. Implement activities ^d	12	1	12	0
d. Develop record system ⁱ	3	1	3	0
e. Time to enter information ^j	1	52	52	45
f. Time to train personnel	3	2	6	0
g. Time to adjust existing ways to comply with previously applicable requirements	N/A			
h. Time to transmit information ^k	0.25	2	0.5	45
i. Time for audits	N/A			
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Costs (rounded) ^l				
Total Capital and O&M Cost (rounded) ^l				
Grand Total (rounded) ^l				

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be 45. There are no new f

^b This ICR uses the following labor rates for privately-owned sources: \$141.06 for managerial, \$120.27 for technical, an Department of Labor, Bureau of Labor Statistics, June 2019, “Table 2. Civilian Workers, by occupational and industry gr rates have been increased by 110 percent to account for the benefit packages available to those employed by private indus

^c We have assumed that all respondents will have to familiarize with regulatory requirements each year.

^d Only new respondents would have to comply with the initial rule requirements, including notification and performance

^e Performance tests are required for particulate matter by Method 5 or total metal HAP by Method 29, for triethylamine b emission source. We have assumed that 5 percent of respondents would repeat performance tests due to failure.

^f Monitoring and recordkeeping of operations for respondents with add-on control devices include: 1) specific operating i performance test, 2) startup, shutdown, and malfunction of equipment, 3) work practices including an inspection of iron a organics and HAP metals in the charge materials used by the metal casting department. Eighteen (18) of the 45 facilities r

^g We have assumed that respondents are required to submit semiannual compliance reports that include all the required ir operation and maintenance requirements under the NESHAP rule, including those required to be reported under 40 CFR i

^h We have assumed that one respondent with add-on controls per year will have at least one startup, shutdown or malfunc

ⁱ We have assumed that new respondents would already have the technology and recordkeeping systems in place to moni

^j We have assumed that it will take each respondent one hour 52 times per year to enter information.

^k We have assumed that it will take each of the respondents 15 minutes two times per year to transmit information.

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

R Part 63, Subpart EEEEE) (Renewal)

(E) Technical hours per year (E=CxD)	(F) Management hours per year (F=Ex0.05)	(G) Clerical hours per year (G=Ex0.10)	(H) Total cost per year (\$) ^b
90	5	9	\$11,987.10
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
7,875	394	788	\$1,048,871.25
432	22	43	\$57,538.08
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
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
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
1,440	72	144	\$191,793.60
4	0.2	0.4	\$532.76

Labor Rates	
Management	\$141.06
Technical	\$120.27
Clerical	\$58.67

11,317			\$1,310,723
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
2,340	117	234	\$311,664.60
0	0	0	\$0
0	0	0	\$0
23	1	2	\$2,996.78
0	0	0	\$0.00
2,717			\$314,661
14,000			\$1,630,000
			\$246,000
			\$1,880,000

boundries projected during the next three years of this ICR.

d \$58.67 for clerical labor. These rates are from the United States
 oup.” The rates are from column 1, “Total compensation.” The
 try.

test for add-on control devices.

ly Method 18, and VOHAP by Method 18 or 25A, depending on the

parameters for each control device established during the
 nd steel scrap to minimize, to the extent practicable, the amount of
 must conduct monthly inspections of the capture systems.

information concerning deviations from any emissions limitation or
 part 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A).

tion (SSM) that is not managed according to the SSM plans.

tor daily operations and to comply with existing regulations.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Iron and Steel Foundries (40 CFR 1 (Renewal)

Burden Item	(A)	(B)	(C)	(D)	(E)
	EPA Hours per Occurrence	Number of Occurrences Per Respondent Per Year	EPA Hours Per Respondent Per Year (C=AxB)	Number of Respondents Per Year ^a	Technical Hours Per Year (E=CXD)
1. Applications					
2. Surveys and Studies					
3. Reporting Requirements					
a. Initial performance test	40	1	40	0	0
b. Repeat performance – retesting	40	1	40	0	0
c. Report review ^c					
d. Notification of construction/reconstruction	N/A				
e. Notification of actual startup	N/A				
f. Notification of special compliance requirements	N/A				
g. Notification of applicability	2	1	2	0	0
h. Notification of initial performance test	2	1	2	0	0
i. Notification of CEMS performance evaluation	2	1	2	0	0
j. CEMS QA plan	2	1	2	0	0
k. Notification of compliance status	4	1	4	0	0
l. Site-specific test plan	2	1	2	0	0
m. Scrap selection/inspection plan	4	1	4	0	0
n. Repeat performance test report	2	1	2	0	0
o. Semiannual compliance reports ^d	4	2	8	45	360
p. NESHAP waiver application	4	1	4	0	0
q. Compliance extension request	4	1	4	0	0
r. Scrap inspections	N/A				
s. Emergency startup, shutdown, and malfunction report ^e	4	1	4	1	4
TOTAL (rounded)^f					

Assumptions:

^a We have assumed that the average number of respondents that will be subject to this rule will be 45. There will be no new facilities in the years of this ICR.

^b This ICR uses the following labor rates: \$66.62 for managerial, \$49.44 for technical, and \$26.75 for clerical labor. These rates are based on the Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to reflect the rates available to government employees.

^c Only new respondents would have to comply with the initial rule requirements, including notification and performance test for new facilities.

^d We have assumed that respondents are required to submit semiannual compliance reports.

^e We have assumed that one respondent with add-on controls per year will have one startup, shutdown or malfunction (SSM) report per year.

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

Part 63, Subpart EEEEE)

(F)	(G)	(H)
Management Hours Per Year (F=Ex0.05)	Clerical Hours Per Year (G=Ex0.1)	Total Costs, \$ ^b
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	0	\$0
0	0	\$0
18	36	\$19,960.56
0	0	\$0
0	0	\$0
0.2	0.4	\$221.78
419		\$20,200

Labor Rates	
Management	\$66.62
Technical	\$49.44
Clerical	\$26.75

undries projected during the next three

ates are from the Office of Personnel
nt to account for the benefit packages

or add-on control devices.

hat is not managed according to the SSM

Total Annual Responses			
(A)	(B)	(C)	(D)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports
Initial notification	0	0	0
Semiannual compliance reports	45	2	0
Startup, shutdown, malfunction reports	1	1	0
			Total

Number of Respondents			
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports
	(A)	(B)	(C)
Year	Number of New Respondents ^a	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports
1	0	45	0
2	0	45	0
3	0	45	0
Average	0	45	

^a New respondents include sources with constructed, reconstructed and modified affected facilities.

Capital/Startup vs. Operation and Maintenance (O&M)			
(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)
Leak detectors ^a	\$9,000	0	\$0
Flow rate monitors ^b	\$7,500	0	\$0
pH monitor ^b	\$7,500	0	\$0
Pressure drop ^b	\$7,500	0	\$0
VOC CEM	\$100,000	0	\$0
Total ^c			\$0

^a We assume 3 baghouses per respondent and O&M costs of \$500 per year.

^b We assume pressure drop and scrubber liquid flow rate monitors at 18 venturi (PM) web scrubbers; and flow rate monitors at 18 venturi (PM) web scrubbers; and flow rate monitors at 18 venturi (PM) web scrubbers; and flow rate monitors at 18 venturi (PM) web scrubbers. We assume a yearly O&M cost of \$2,000 for each parametric monitoring system.

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

(E)
Total Annual Responses $E=(B \times C)+D$
0
90
1
91

hours 14,000
hr/response 154

(D)	(E)
Number of Existing Respondents That Are Also New Respondents	Number of Respondents ($E=A+B+C-D$)
0	45
0	45
0	45
	45

M) Costs		
(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M (E X F)
\$1,470	45	\$66,150
\$2,000	45	\$90,000
\$2,000	27	\$54,000
\$2,000	18	\$36,000
\$10,000	0	\$0
		\$246,000

ate and pH monitors for 27 acid/wet scrubbing

