

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Integrated Iron and Steel Manufacturing Facilities  
(40 CFR Part 63, Subpart FFFFF) (Final Amendments)  
March 2020**

**Part A of the Supporting Statement**

**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) (Final Amendments),” EPA ICR Number 2003.09, OMB Control Number 2060-0517.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel (II&S) Manufacturing Facilities was proposed on July 13, 2001, promulgated on May 20, 2003, and amended on July 13, 2006. The NESHAP is codified at 40 CFR Part 63, Subpart FFFFF. Amendments to the NESHAP were proposed on August 16, 2019 and are being finalized as a result of the residual risk and technology review (RTR) required under the Clean Air Act (CAA) (as discussed further below). The NESHAP applies to Integrated Iron and Steel Manufacturing Facilities that emit greater than or equal to 10 tons per year (tpy) of any one hazardous air pollutant (HAP) or greater than or equal to 25 tpy of any combination of HAPs. Affected sources include sinter plant windbox exhaust, discharge end, and sinter cooler; the blast furnace casthouse; and the Basic Oxygen Process Furnace (BOPF) shop, including each individual BOPF and shop ancillary operations (hot metal transfer, hot metal desulfurization, slag skimming, and ladle metallurgy). The pollutants regulated include HAP metals, using particulate matter (PM) as a surrogate, and volatile organic compounds (VOC) for the sinter plant. New facilities include those that commenced construction or reconstruction after the date of the original proposal (July 13, 2001). This information is being collected to assure compliance with 40 CFR Part 63, Subpart FFFFF.

In general, all NESHAP require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. Owners/operators are also required to maintain records of the occurrence and duration of any failures to meet applicable standards, 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 sources subject to NESHAP. A semiannual report is also required.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least 5 years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

The final RTR amendments to the rule eliminate the startup, shutdown, and malfunction (SSM) exemption; remove the SSM plan requirement; add electronic submittal of notifications, semiannual reports, and performance test reports; and make technical and editorial changes. The final rule also addresses an outstanding petition for reconsideration and voluntary remand regarding standards for mercury by adding requirements for the control of mercury from basic oxygen furnaces and related equipment. The emission standard for mercury is based on limiting the mercury emitted from the use of steel scrap. Facilities can comply by completing annual

stack tests or by certifying they obtain scrap from vendors who participate in the EPA-approved National Vehicle Mercury Switch Recovery Program or other similarly-approved program, or by using scrap not likely to contain mercury. We expect all facilities will comply through certification of scrap and have estimated the total costs for the standard based on this assumption. The remaining portions of the NESHAP remain unchanged.

There are 11 major source facilities subject to the standard, where one facility is idle and expected to shutdown in near future. These estimates are based on the research conducted by the EPA during the subpart FFFFF RTR rulemaking, consultation with the industry, and an information collection request (ICR) conducted by EPA's Office of Air Quality Planning and Standards (OAQPS) in 2011. The EPA is not aware of any new major source facilities being built.

None of the 11 II&S Manufacturing facilities in the United States are owned by state, local, or tribal governments or the Federal government. They are owned and operated by privately owned for-profit businesses.

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**

Section 112 of the CAA requires the EPA to establish NESHAP for major sources of HAP that are listed for regulation under CAA section 112(c). A major source is a stationary source that emits or has the potential to emit more than 10 tpy of any single HAP or more than 25 tpy of any combination of HAP. For major sources, the NESHAP includes technology-based standards that must reflect the maximum degree of emission reductions of HAP achievable (after considering cost, energy requirements, and non-air quality health and environmental impacts). The NESHAP are commonly referred to as maximum achievable control technology (MACT) standards. In the Administrator's judgment, HAP emissions from II&S Manufacturing facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP for this source category were promulgated at 40 CFR Part 63, Subpart FFFFF in 2003.

Section 112(d)(6) of the CAA requires the EPA to review the technology-based MACT standards and revise them "as necessary (taking into account developments in practices, processes, and control technologies)" no less frequently than every 8 years. In addition, section 112(f) of the CAA requires the EPA to determine whether the MACT emissions limitations provide an ample margin of safety to protect public health. For MACT standards for HAP "classified as a known, probable, or possible human carcinogen" that "do not reduce lifetime excess cancer risks to the individual most exposed to emissions from a source in the category or subcategory to less than 1-in-1 million," the EPA must promulgate residual risk standards for the source category (or subcategory) as necessary to provide an ample margin of safety to protect public health. In doing so, EPA may adopt standards equal to existing MACT standards, if the EPA determines that the existing standards are sufficiently protective. The EPA must also adopt more stringent standards, if necessary, to prevent an adverse environmental effect, but must consider cost, energy, safety, and other relevant factors in doing so.

Certain records and reports are necessary for the Administrator to confirm the compliance status of sources subject to NESHAP, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the CAA (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions (40 CFR Part 63, Subpart A). CAA Section 114(a) states that the Administrator may require any owner or 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.

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

The control of emissions of HAP from II&S Manufacturing facilities requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of HAP from these sources are the result of operation of the affected sources.

The standards are achieved by the reduction of pollutant emissions using process changes and control technology. The notifications required in the standards are used to inform 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, leaks are being detected and repaired, and the standards are being met.

Performance test reports are needed, as these are the Agency's record of a source's initial and ongoing capability to comply with the emission standards and serve as a record of the operating conditions under which compliance was achieved. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate their control equipment and achieve continuous compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the CAA. The information collected from recordkeeping and reporting requirements is also used for targeting inspections and is of sufficient quality to be used as evidence in court.

## **3. Nonduplication, Consultations, and Other Collection Criteria**

The recordkeeping and reporting requested is required under 40 CFR Part 63, Subpart FFFFF.

### **3(a) Nonduplication**

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, no duplication exists.

### **3(b) Public Notice Required Prior to ICR Submission to OMB**

This section is not applicable because this is a rule-related ICR. Nevertheless, the preamble to the proposed RTR (84 FR 42704) provided public notice of this ICR. One public comment specifically relating to the burden estimates in this ICR was received. This ICR was updated following proposal to respond to this comment and reflect changes made to the final rule as a result of other public comments.

### **3(c) Consultations**

Stakeholder outreach occurred with industry groups including American Iron and Steel Institute (AISI) and member companies of this organization. Further stakeholder and public input occurred through public comment on the proposed RTR amendments to Subpart FFFFFF in the *Federal Register* and follow-up meetings with interested stakeholders.

In addition, the EPA/OAQPS conducted a two-part ICR (questionnaire and stack testing) in 2011 to gather data from the II&S manufacturing industry. The results from the questionnaire part of this ICR were used in updating the burden estimates contained in this supporting statement.

### **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 and the final RTR amendments was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would decline. .

### **3(e) General Guidelines**

None of these reporting or recordkeeping requirements and final RTR amendments violate any of the regulations established by OMB under 5 CFR 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least 5 years. This is consistent with the General Provisions as applied to these standards. EPA believes that the 5-year records retention requirement is consistent with the Part 70 permit program and the 5-year statute of limitations on which the permit program is based. The retention of records for 5 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. The EPA has found that the most flagrant violators have violations extending beyond 5 years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records in the absence of the 5-year maintenance requirement.

### **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**

None of the reporting or recordkeeping requirements or the final RTR amendments contain sensitive questions.

#### 4. The Respondents and the Information Requested

##### 4(a) Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements and the final RTR amendments are II&S Manufacturing facilities. The North American Industry Classification System (NAICS) code for respondents affected by the standards is listed in the table below.

Standard (40 CFR Part 63, Subpart FFFFF)	NAICS Codes
Integrated Iron and Steel Manufacturing	331110

##### 4(b) Information Requested

###### (i) Data Items

All data in this ICR that are recorded and/or reported are required by 40 CFR Part 63, Subpart FFFFF or would be required under the final RTR amendments. Subpart FFFFF references 40 CFR Part 63, Subpart A for several general reporting and recordkeeping requirements that apply for all NESHAP.

A source must make the following notifications and reports:

Notifications	
Applicability	§63.5(b), §63.7840(a), §63.9(b)(2)
Commencement of construction or reconstruction	§§63.9(b)(4)-(5), §63.7840(a), §63.5
Actual startup	§63.9(b)(4), §§63.7840(b)-(c)
Intention to construct/reconstruct	§63.9(b)(1), §63.7840(a)
Compliance dates/extension	§63.9(c), §63.7840(a)
Performance test/performance evaluation/opacity observations	§63.9(e), §63.9(g), §63.7840(a), §§63.7840(d)-(e), §63.7(b), §63.8(e)
Compliance status (including electronic submittal of performance test data)	§§63.9(g)-(h), §§63.7840(e)-(h)

Reports	
Application for approval of the construction or reconstruction of a new major affected source, or reconstruction of a major affected source	§63.5(d)(2)
Performance test results	§63.10(d)(2), §63.7840(e)(2)
Operation and maintenance plan	§63.7800(b)
Progress reports for compliance extension (if applicable)	§63.6(i)(11)
Semiannual report of compliance	§§63.7841(a)-(b)

<b>Reports</b>	
Electronic submittal of semiannual reports	§§63.7841(c)-(f)

A source must keep the following records:

<b>Recordkeeping</b>	
Notifications and reports	§63.10(b)(2)(xiv), §63.7842(a)(1)
Record retention	§63.10(b)(1)
Records of date, time, and duration of failures to meet applicable standards	§63.7842(a)(2)
For each failure, a list of affected sources or equipment, noncompliant emissions estimates, and method used to estimate emissions	§63.7842(a)(3)
Records of actions taken to minimize emissions and corrective actions taken to return affected unit to normal operation	§63.7842(a)(4)
Performance test and opacity observations	§63.10(b)(2)(viii), §63.7842(a)(5)
Continuous monitoring systems	§§63.10(b)(2)(vi)-(xi), §63.8(d)(2), §§63.6(h)(7)(i)-(ii), §63.7842(b)
Visual observations	§63.6(h)(6), §63.7842(c)
Records required to demonstrate continuous compliance with emission limitations and operation and maintenance requirements	§63.10(b)(2)(vii), §63.7833, §63.7834, §63.7842(d)
Records to demonstrate compliance with requirements for control of mercury	§63.7842(e), §§63.7791(a)-(b)

### Electronic Reporting

Currently, sources are using monitoring equipment that provides automated parameter data (e.g., continuous opacity or control device parameter monitoring). Although personnel at the facilities still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. Modern II&S Manufacturing facilities employ distributive controls on their manufacturing process and have integrated many of the compliance recordkeeping and reporting requirements into their systems. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically, which is reducing the reporting burden. As part of the final RTR amendments, respondents would be required to use the EPA's Electronic Reporting Tool (ERT) to submit performance test reports for test methods supported by the ERT.<sup>1</sup> Respondents would also be required to submit notifications and

<sup>1</sup> As of 2019, Methods 1, 2, 2F, 2G, 3, 3A, 3B, 4, 5, 17, 29, are the test methods referenced in subpart FFFFF that are included in the ERT. Method 5D for Particulate Matter measurement from positive pressure fabric filter, Method 9 for Visual Opacity, Method 25 for gaseous nonmethane organic emissions, Method 30B for

semiannual reports through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI).

**(ii) Respondent Activities**

The respondent activities required by Subpart FFFFF are listed in the following table.

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate any: CMS, 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.
Conduct performance tests using EPA Reference Methods 1, 2, 2F, 2G, 3, 3A, 3B, 4, 5, 5D, 9, 17, 25, 29, 30B, or SW-846 Method 9071B, 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**

The EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

<b>Agency Activities</b>
Observe 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.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and Integrated Compliance Information System (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 standard and note the operating conditions under which compliance was achieved. 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 5 years.

### **5(c) Small Entity Flexibility**

All of the respondents are large entities (i.e., large businesses), there are no small businesses operating II&S manufacturing facilities.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown below in Table 1: Average Annual Respondent Burden and Cost – NESHAP for Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF) (Final Amendments).

## **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 not conduct or 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 3 years from these recordkeeping and reporting requirements and the final RTR amendments is estimated to be 9,000 hours per year (Total Labor Hours from Table 1). 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 for Subpart FFFFF, and any comments received.

### **6(b) Estimating Respondent Costs**

#### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

<b>Civilian Worker Rates</b>	<b>Labor Rates, \$/hr <sup>a</sup></b>	<b>110% Overhead</b>	<b>Total, \$/hr</b>
Managerial	\$66.49	\$73.14	\$139.63
Technical	\$56.89	\$62.58	\$119.47
Clerical	\$27.69	\$30.46	\$58.15

<sup>a</sup> <http://data.bls.gov/cgi-bin/print.pl/news.release/ecec.t02.htm>

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 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 O&M 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 and other compliance activities. The capital/startup costs are one-time costs when a facility becomes subject to the regulation and include startup cost for continuous monitoring systems (CMS). The annual operation and maintenance (O&M) costs are the ongoing costs to maintain the monitors. The EPA does not anticipate any new II&S manufacturing facilities to be built.

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

The table below summarizes the capital/startup and O&M costs associated with monitors.

<b>Capital/Startup vs. O&amp;M Costs</b>						
<b>(A) Cost Item</b>	<b>(B) Capital/ Startup Cost for One Respondent</b>	<b>(C) Number of Respondents</b>	<b>(D) Total Capital/ Startup Cost, (B x C)</b>	<b>(E) Annual O&amp;M Costs for One Respondent</b>	<b>(F) Number of Respondents with O&amp;M</b>	<b>(G) Total O&amp;M, (E x F)</b>
Leak detectors	\$9,000	0	0	\$2,389	11	\$26,279
Continuous opacity monitors	\$37,000	0	0	\$8,000	3	\$24,000
<b>Total</b>			<b>0</b>			<b>\$50,300</b>
<b>Total annualized capital + O&amp;M cost</b>						<b>\$50,300</b>

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table. The annualized capital/startup costs are \$0. The total annual O&M costs are \$50,300. This is the total of column G. The average annualized cost for capital/startup and O&M costs to industry over the next 3 years of the ICR is estimated to be \$50,300.

### **6(c) Estimating Agency Burden and Cost**

The only costs to the Agency are costs associated with observation of the initial performance tests and analysis of the reported information. Publication and distribution of the information are part of the ECHO program. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of the EPA's overall compliance and enforcement program. The average annual Agency cost during the 3 years of the ICR is estimated to be \$14,900.

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

<b>Agency Worker Rates</b>	<b>Labor Rates, \$/hr<sup>a</sup></b>	<b>60% Overhead</b>	<b>Total, \$/hr</b>
Managerial (GS-13, step 5)	\$41.07	\$24.64	\$65.71
Technical (GS-12, step 1)	\$30.47	\$18.28	\$48.75
Clerical (GS-6, step 3)	\$16.49	\$9.89	\$26.38

<sup>a</sup> [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS_h.pdf)

These rates are from the Office of Personnel Management (OPM), 2019 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) (Final Amendments).

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

Based on our research for this ICR, there are approximately 11 existing sources currently subject to the standard, all of which will keep records and submit reports. The average number of respondents is calculated using the following table that addresses the 3 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>a</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	11	0	0	11
2	0	11	0	0	11
3	0	11	0	0	11
<b>Average</b>	<b>0</b>	<b>11</b>	<b>0</b>	<b>0</b>	<b>11</b>

<sup>a</sup> New respondents include sources with constructed and reconstructed affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the 3-year period of this ICR is 11.

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
Notification of actual startup	0	1	0	0
Notification of performance test	0	1	0	0
Semiannual compliance reports	11	2	0	22
Report of performance test (through CEDRI using ERT)	11	1	0	11
			<b>Total</b>	<b>33</b>

<sup>a</sup> Notifications and semiannual reports submitted through CEDRI. Report of performance test/retest submitted through ERT.

The number of Total Annual Responses is 33, all of which will be submitted electronically.

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

## **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 in Tables 1 and 2 below, respectively, and summarized below.

### **(i) Respondent Tally**

The total annual labor hours are 6,500 at a cost of \$800,000. Details regarding these estimates may be found in Table 1: Average Annual Respondent Burden and Cost – NESHAP for Integrated Iron and Steel Manufacturing facilities (40 CFR Part 63, Subpart FFFFF) (Final Amendments).

We assume that burdens for managerial tasks take 5 percent 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 percent 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 197 hours per response.

The total annual O&M costs to the regulated entity are \$50,300. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. O&M Costs.

### **(ii) The Agency Tally**

The average annual Agency burden and cost over the next 3 years are estimated to be 202 labor hours and \$9,600. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Integrated Iron and Steel Manufacturing facilities (40 CFR Part 63, Subpart FFFFF) (Final Amendments).

We assume that burdens for managerial tasks take 5 percent 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 percent 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**

This ICR is prepared for final RTR amendments to the NESHAP for Integrated Iron and Steel Manufacturing facilities (40 CFR, Part 63, Subpart FFFFF). These final RTR amendments: (1) adjust references to the Part 63 General Provisions (40 CFR, Part 63, Subpart A) and revise provisions in the NESHAP (40 CFR Part 63, Subpart FFFFF) to remove the SSM exemption and SSM plan requirement; (2) add requirements for the control of mercury emissions from use of steel scrap; (3) add electronic submittal of notifications, semiannual reports, and performance test reports; and (4) make technical and editorial changes. Where applicable, adjustments for these final RTR amendments are reflected in Tables 1 and 2 of this ICR.

The number of affected facilities changed because of continued closures within the Integrated Iron and Steel Manufacturing industry, which reduced the number of facilities previously affected by Subpart FFFFF.

Costs per labor hour increased slightly due to increases in Technical and Clerical labor rates. The burden estimate for familiarizing with regulatory requirements was increased to reflect the actual time it would take industry to review the final amendments. Burden estimates were added for the industry to meet the requirements for the control of mercury emissions from the use of steel scrap, prepare notifications of performance test/performance evaluation, report the results of the performance tests through the ERT, prepare notification of

compliance status, record failures to meet standards and actions taken to minimize emissions, conduct refresher training, transition to submitting notifications and semiannual reports through CEDRI, and compile data for semiannual reports. Burden estimates were removed for developing SSM plans and submitting periodic SSM reports.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 197 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 not conduct or 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, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2002-0083. 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 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 EPA Docket Center, EPA 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) 566-1742. Send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, NW, Washington, DC 20503. Please include the EPA Docket ID Number EPA-HQ-OAR-2002-0083 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 data collection associated with the rule.

**Table 1: Average Annual Respondent Burden and Cost – NESHAP for Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF) (Final Amendments)**

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. Familiarization with rule requirements	2	1	2	11	22	1.1	2.2	\$2,910
B. Required activities <sup>c</sup>								
i. Method 5 performance test <sup>d</sup>	40	8.9	356	3.7	1,305	65.3	130.5	\$172,650
ii. Method 9 performance test <sup>d</sup>	8	3.9	31.2	3.7	114.4	5.72	11.44	\$15,131
iii. Method 9071B performance test <sup>d</sup>	2	365	730	4	2,920	146.0	292	\$386,215
iv. Method 29 performance test <sup>d</sup>	8	6.3	50.4	0	0	0	0	\$0
v. Certify compliance with NVMSRP/approved mercury removal program or nonmercury scrap <sup>d</sup>	4	1	4	11	44	2.2	4	\$5,820
vi. Inspection and maintenance of capture systems and control devices	2	12	24	11	264	13.2	26.4	\$34,918
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	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	11	880	44	88	\$116,394
ix. Report of performance test (through CEDRI using ERT) <sup>f</sup>	8	1	8	11	88	4	9	\$11,639
<b>Subtotal for Reporting Requirements</b>						<b>6,483</b>		<b>\$745,677</b>
4. Recordkeeping Requirements								
A. Familiarization with rule requirements	See 3A							

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>
B. Plan activities <sup>e</sup>	10	1	10	0	0	0	0	\$0
C. Implement activities	See 3B							
D. Develop record system/maintain records <sup>g</sup>	4	1	4	11	44	2.2	4.4	\$5,820
E. Time to enter and transmit information	See 3D ix.							
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>51</b>		<b>\$5,820</b>
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>h</sup></b>						<b>6,500</b>		<b>\$750,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>h</sup></b>								<b>\$50,300</b>
<b>GRAND TOTAL (rounded) <sup>h</sup></b>								<b>\$800,000</b>

<sup>a</sup> There are approximately 11 existing sources currently subject to this rule. We estimate there will be no additional new source that will become subject to the rule each year over the 3-year period of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$139.63 per hour for Executive, Administrative, and Managerial labor; \$119.47 per hour for Technical labor, and \$58.15 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 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 [3 plants, 4 strands (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 non-baghouse emission point must be sampled by Method 5 for particulate matter, Method 9 for opacity observations to determine the opacity of fugitive emissions; and once during each term of their title V operating permit, each baghouse emission point must be sampled by Method 5 for particulate matter, Method 9 for opacity observations to determine the opacity of fugitive emissions (3.7=11/3 plants). Compliance for mercury includes using Method 29 twice per permit cycle or certify compliance with NVMSRP/approved mercury removal program or certify the use of scrap without mercury 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 5; 3.9 (43/11) 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 sinter plants, 1 facility has 2 strands), the oil content of the sinter feed must be analyzed each day; 6.3 (69/11) emission points per respondent that need to be sampled using Method 29. We have assumed Method 29 mercury add-on costs to Method 5 for PM of \$6,240 per test. We have estimated that 0 (zero) facilities will choose to comply with \$63.7791 with a Method 29 stack test per \$63.7825(a)-(f) and 11 facilities will choose to comply with \$63.7791 using the NVMSRP/approved mercury removal program, or use of scrap that does not contain mercury per \$63.7791(b), (c), or (d).

<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> Submittal of performance test data through the EPA's CEDRI in ERT format is estimated to require 8 hours annually, includes keeping records of failures to meet the standards and the actions taken to minimize emissions.

<sup>g</sup> We have assumed that it takes each respondent approximately 4 hours to develop a record system to certify compliance with NVMSRP/approved mercury removal program or nonmercury scrap and maintain records.

<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) (Final Amendments)**

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>	15	0.4	6	3.7	22	1.1	2.2	\$1,203
ii. Review semiannual compliance reports <sup>e</sup>	6	2	12	11	132	6.6	13.2	\$7,217
iii. Certify compliance with NVMSRP/approved mercury removal program or nonmercury scrap	2	1	2	11	22	1.1	2.2	\$1,203
Subtotals Labor Burden and Cost						202		\$9,623
<b>TOTAL ANNUAL BURDEN AND COST (rounded) <sup>g</sup></b>						<b>202</b>		<b>\$9,600</b>

<sup>a</sup> There are approximately 11 existing sources currently subject to this rule. We expect there will be no additional new source that will become subject to the rule each year over the 3-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 3-year period of ICR), respondents must sample each emission point using Method 5 for particulate matter, Method 9 for opacity observations, 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 certification of compliance with NVMSRP/approved mercury removal program or nonmercury scrap for EPA review.

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