Table 1: Annual Respondent Burden and Cost – NESHAP for Integrated Iron and Steel Ma

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) 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 [c]			
i. Method 5 performance test [d]	40	8.9	356
ii. Method 9 performance test [d]	8	3.9	31.2
iii. Method 9071B performance test [d]	2	365	730
iv. Method 29 performance test [d]	8	6.3	50.4
v. Certify compliance with NVMSRP/approved mercury removal program or nonmercury scrap[d]	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 [c]			
i. Notification of applicability [e]	2	1	2
ii. Notification of compliance status [e]	2	1	2
iii. Notification of intent to construct a major source and review application [e]	4	1	4
iv. Notification of initial construction/reconstruction [e]	4	1	4
v. Notification of actual startup [e]	4	1	4
vi. Notification of performance test [e]	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) [f]	8	1	8
Subtotal for Reporting Requirements			
4. Recordkeeping Requirements			
A. Familiarization with rule requirements	See 3A		
B. Plan activities [e]	10	1	10
C. Implement activities	See 3B		
D. Develop record system/maintain records [g]	4	1	4
E. Time to enter and transmit information	See 3D ix.		
F. Time to train personnel [e]	3	1	3
G. Time for audits	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (unrounded)			
TOTAL LABOR BURDEN AND COST (rounded) [h]			
TOTAL CAPITAL AND O&M COST (rounded) [h]			
GRAND TOTAL (rounded) [h]			

Assumptions:

[a] There are approximately 11 existing sources currently subject to this rule. We estimate there will be no additional nev
this ICR.

[b] This ICR uses the following labor rates: $139.63 per hour for Executive, Administrative, and Managerial labor; $119
rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2018, "Table 2. Civilian V
"Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those

[c] Monitoring and recordkeeping of operations for respondents will include monthly inspection of capture and control s
(from the composite of three samples taken at 8-hour intervals)] to compute the 30-day rolling average oil content for
must be sampled by Method 5 for particulate matter, Method 9 for opacity observations to determine the opacity of fug
each baghouse emission point must be sampled by Method 5 for particulate matter, Method 9 for opacity observations
for mercury includes using Method 29 twice per permit cycle or certify compliance with NVMSRP/approved mercury

[d] We have assumed that there is an average of 8.9 (98/11) emission points per respondent that need to be sampled using
using Method 9; 4 emissions points per respondent that need to be sampled using Method 9071B (3 facilities with sinte
analyzed each day; 6.3 (69/11) emission points per respondent that need to be sampled using Method 29. We have assu
We have estimated than 0 (zero) facilities will choose to comply with §63.7791 with a Method 29 stack test per §63.78
NVMSRP/approved mercury removal program, or use of scrap that does not contain mercury per §63.7791(b), (c), or (

[e] These requirements are one-time requirements that apply to new respondents. There are no new respondents estimate

[f] Submittal of performance test data through the EPA's CEDRI in ERT format is estimated to require 8 hours annually,
to minimize emissions.

[g] We have assumed that it takes each respondent approximately 4 hours to develop a record system to certify complian
and maintain records.

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

ıufacturing (40 CFR Part 63, Subpart FFFFF) (Final Rule)

	$119.47	$139.63	$58.15	Labor Cost Per Hour
(D)	**(E)**	**(F)**	**(G)**	**(H)**
Respondents per year [a]	**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 [b]**
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
	6,483			**$745,677**
0	0	0	0	$0
11	44	2.2	4.4	$5,820
0	0	0	0	$0
	51			**$5,820**
				$751,496
	6,500			**$750,000**
				$50,300
				$800,000

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

Hours per response
197

ν 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.

ystems; 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
gitive 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
removal program or certify the use of scrap without mercury annually.

g Method 5; 3.9 (43/11) emission points per respondent that need to be sampled
er plants, 1 facility has 2 strands), the oil content of the sinter feed must be
umed Method 29 mercury add-on costs to Method 5 for PM of $6,240 per test.
325(a)-(f) and 11 facilities will choose to comply with §63.7791 using the
(d).

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

ce with NVMSRP/approved mercury removal program or nonmercury scrap

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

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year [a]
New Respondents [c]				
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 [d]	15	0.4	6	3.7
ii. Review semiannual compliance reports [e]	6	2	12	11
iii. Certify compliance with NVMSRP/approved mercury removal program or nonmercury scrap	2	1	2	11
Subtotals Labor Burden and Cost				
TOTAL ANNUAL BURDEN AND COST (rounded) [g]				

Assumptions:

[a] There are approximately 11 existing sources currently subject to this rule. We expect there will be no additional new sc this ICR.

[b] This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for gov $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, $16.4 "2018 General Schedule" which excludes locality rates of pay.

[c] These requirements are one-time requirements that apply to new respondents. There are no new respondents estimated c

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

[e] Sources are required to submit electronic semiannual compliance reports to CEDRI.

[f] We have assumed that each facility per year will submit their certification of compliance with NVMSRP/approved merc

[g] 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) (Fi

$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, $ [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
22	1.1	2.2	$1,203
132	6.6	13.2	$7,217
22	1.1	2.2	$1,203
202			$9,623
202			**$9,600**

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

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

ɔver the 3 year period of this ICR.

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

ːury removal program or nonmercury scrap for EPA review.

inal Rule)

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

(G)
Total O&M,
$26,279
$24,000
$50,300