

**Table 1: Annual Respondent Burden and Cost – NESHAP for Taconite Iron Ore Processing (**

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			
i. Method 5 performance test - facility labor <sup>c</sup>	40	1	40
ii. Method 5 performance test - contractor costs <sup>d</sup>	-	-	-
iii. SSM Plan	N/A		
C. Create information	N/A		
D. Gather existing information	N/A		
E. Write report			
i. Initial Notifications <sup>e</sup>	2	1	2
ii. Compliance Extension Request <sup>e</sup>	2	1	2
iv. Site-specific Test Plan <sup>e</sup>	40	1	40
v. Operation and Maintenance Plan <sup>e</sup>	40	1	40
vi. Fugitive Dust Emission Control Plan <sup>e</sup>	20	1	20
vii. Site-specific Monitoring Plan <sup>e</sup>	80	1	80
viii. Petition for Alternative Monitoring Requirements <sup>e</sup>	40	1	40
ix. Notification of Performance Test	4	1	4
x. Semiannual compliance reports	40	2	80
x. 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>	3	1	3
C. Develop record system <sup>e</sup>	16	1	16
D. Time to Enter Information	See 3E x.		
E. Time to train personnel <sup>e</sup>	3	1	3
F. Time to Transmit or Disclose Information	See 3E x.		
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>g</sup></b>			

**Assumptions:**

<sup>a</sup> There are approximately 8 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; \$119.4 rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2018, "Table 2. Civilian Workers' Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employees.

<sup>c</sup> Assumes that 1/3 of all sources will conduct performance test in each of the 3 years. Includes 40 hours per facility per year.

<sup>d</sup> Testing contractor cost are based on the following: (51 enduring furnace Method 5 PM tests, twice/5 yr term @ \$10,000/test) = \$438,000/year.

<sup>e</sup> These requirements are one-time requirements that apply to new respondents. There are no new respondents estimated in 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, in order to minimize emissions.

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

**40 CFR Part 63, Subpart RRRRR)**

	\$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>
8	16	0.8	1.6	\$2,116
2.7	107	5.3	10.7	\$14,108
-	-	-	-	\$438,000
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
8	32	2	3	\$4,232
8	640	32	64	\$84,650
8	64	3	6	\$8,465
		<b>987</b>		<b>\$551,572</b>
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
		<b>0</b>		<b>\$0</b>
				<b>\$551,572</b>
		<b>1,000</b>		<b>\$550,000</b>

Ind. Furnaces and ore c  
OCH and PH operator

No. of responses
0
0
0
0
0
0
0
0
0
0
8
16
8
<b>32</b>

Hours per response
<b>31</b>

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

7 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.

year to set up testing contractor, oversee tests, and review test reports.

00/test) + (117 OCH, PH, and Ore dryer Method 5 PM tests, once/5 yr term @

over the 3-year period of this ICR.

cludes keeping records of failures to meet the standards and the actions taken

dryers

53

ns

115

**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 <sup>d</sup>	8	5.5	44	8
ii. Review semiannual compliance reports <sup>e</sup>	6	2	12	8
Subtotals Labor Burden and Cost				
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>f</sup></b>				

**Assumptions:**

<sup>a</sup> There are 8 existing sources currently subject to this rule. We expect there will be no additional new source that will be

<sup>b</sup> 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.

<sup>c</sup> These requirements are one-time requirements that apply to new respondents. There are no new respondents estimated o

<sup>d</sup> 51 Indurating furnaces conduct two Method 5 PM test every 5 years for an average of 20.4 tests/yr (51 x 2/5). 117 OCH, average of 23.4 tests/yr (117/5). That is a total of 43.8 tests/yr (20.4 + 23.4). 43.8 tests/yr distributed over 8 plants is 5.5 te

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

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

**ESHAP for Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR)**

\$48.75 (E)	\$65.71 (F)	\$26.38 (G)	Labor Cost per Hour (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
0	0	0	\$0
352	17.6	35.2	\$19,245
96	4.8	9.6	\$5,249
515			\$24,494
<b>515</b>			<b>\$24,500</b>

come subject to the rule each year over the 3-year period of this ICR.

ernment 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.

, PH, and ore dryers conduct one Method 5 PM test every 5 years for an ests/yr/plant.