

Table 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foundries

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. Surveys and Studies	N/A		
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A		
4. Reporting Requirements			
A. Familiarization with Regulatory Requirements ^a	0.5	1	0.5
B. Required activities			
Repeat performance tests for opacity	N/A		
Scrap specifications ^c	4	1	4
Monthly emission averaging calculation	N/A		
No methanol binder formulation ^d	0	0	0
C. Create information	See 4B		
D. Gather existing information	See 4B		
E. Write report	See 4B		
Initial notification of applicability ^c	2	1	2
Notification of compliance status ^c	4	1	4
Notification of construction/reconstruction ^c	N/A		
Notification of actual startup ^c	N/A		
Notification of foundry reclassification ^e	1	0	0
Request for compliance extension ^c	N/A		
Notification of repeat performance test	N/A		
Site specific test plan	N/A		
Notification of performance evaluation	N/A		
Quality assurance plan for CEMS/COMS	N/A		
NESHAP waiver request ^c	N/A		
Startup, shutdown, and malfunction plan/reports	N/A		
Report of performance test (through CEDRI using ERT) ^c	N/A		
Semiannual compliance reports	4	2	8
Subtotal for Reporting Requirements			
5. Recordkeeping Requirements			
A. Familiarization with Regulatory Requirements	See 4A		
B. Plan activities ^f	2	1	2
C. Implement activities ^f	2	1	2
D. Develop record system ^f	1	1	1
E. Time to enter information ^g	0.1	52	5.2
F. Time to transmit or disclose information	0.25	2	0.5
G. Time to adjust existing ways ^f	1	1	1

F. Time to train personnel ^f	2	1	2
G. Time for audits	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded)^h			
TOTAL CAPITAL AND O&M COST (rounded)^h			
GRAND TOTAL (rounded)^h			

Assumptions:

^a This table is specific to area source foundries classified as small iron and steel foundries. A total of 315 of the 390 area s

^b This ICR uses the following labor rates from the United States Department of Labor, Bureau of Labor Statistics, May 20

^c One-time only costs

^d We have assumed that no burden would be incurred for this requirement because all small area source foundries are alre

^e We have assumed that no small foundries will be reclassified as large foundries.

^f We have assumed that all small foundries would review record keeping system, adjust methods and train employees dur

^g We have assumed that small foundries must record information to demonstrate compliance with pollution prevention ma

^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Small foundries are not .

Industry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Proposed Amendments)

81.33 123.71 42.8

(D) Respondents per year ^a	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Total Cost per year ^b	ERG comment on changes
315	158	7.9	15.8	\$14,458	added respondent burden and r
0	0	0	0	\$0	
					do not see rolling average in rul
0	0	0	0	\$0	
0	0	0	0	\$0	
0	0	0	0	\$0	
					added footnote g since this is or
					added footnote g since this is or
0	0	0	0	\$0	
					added footnote g since this is or
					this was the line item for footno
					added footnote g since this is or
					added footnote g since this is or
					added footnote g since this is or
					added footnote g since this is or
					added footnote g since this is or
					new footnote H since we did not
315	2520	126	252	\$231,325	new footnote H since we did not
	3,079			\$245,782	
105	210	11	21	\$19,277	
105	210	11	21	\$19,277	
105	105	5	11	\$9,639	added footnote g since this is o
315	1,638.0	81.90	163.80	\$150,361.03	
315	158	7.88	15.75	\$14,457.79	
105	105	5	11	\$9,639	

105	210	10.5	21.0	\$19,277	added training time
		3,031		\$241,927	
		6,110		\$488,000	
				\$0	
		6,110		\$488,000	

source foundries are small foundries and 75 are large foundries. No new area source foundries are projected during 2018, mean labor rates for Foundries (NAICS 331500) for Management Occupations (11-0000), Environmental I

already meeting the no methanol requirement.

During the first year of the rule amendments. Subsequent years, these activities would not be needed. Therefore, the management practices for metallic scrap and binder formulations.

assumed to incur any capital or O&M costs.

Salaries taken for NAICS 331500: Foundries
 May 2018 https://www.bls.gov/oes/current/naics4_331500.htm

RTI Comment	Occupation Code	Title	Mean Hourly Rate	Estimated Total Pay with Benefits
Don't use full compensation rates and then add bu	11-0000	Mgmt Occup	58.91	123.71
	17-2081	Envir Engr	38.73	81.33
	43-0000	Office and Adm	20.38	42.8

Estimate only 0.5 hours for small foundries - not much there for them.

Applicable for large foundries only.

Applicable for large foundries only.

1e-time

1e-time

1e-time

ite E which talks about opacity and lack of need for separate notification

1e-time

1e-time

1e-time

1e-time

t assume any small sources would have to write this report

Deleted deviations report - just do semiannual report. Adding here.

Assigning these for initial cost of rule revisions

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ing the 3-year term of this ICR. We assume all respondents will have to spend time familiarizing themselves with regulatory requirements for Professional Engineer (17-2081) and Office and Administrative Support (43-0000). The rates have been increased by 110 percent to account for the time spent familiarizing themselves with the requirements.

The average number of respondents per year is $(315+0+0)/3 = 105$.

ts each year.

enefit packages available to those employed by private industry. Fully burdened hourly rates are: \$123.71 for management; \$81.33 for

or technical; and \$42.80 for clerical.

Table 1b: Annual Respondent Burden and Cost for Large Foundries – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, §

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a
1. Applications	N/A			
2. Surveys and Studies	N/A			
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A			
4. Reporting Requirements				
A. Familiarization with Regulatory Requirements ^a	1	1	1	75
B. Required activities				
On-going Performance Test for PM ^c	70	0.2	14	75
On-going Performance Test for Opacity ^d	3	2	6	75
Scrap material specifications ^e	4	1	4	0
Prepare operation & maintenance plan ^e	8	1	8	0
No methanol binder formulation ^e	4	1	4	0
Initial performance tests ^e	70	0	0	0
Initial and periodic inspections of PM control devices, monthly inspection of capture systems ^f	2	12	24	75
Monthly emissions averaging calculations ^g	0.25	12	3	37.5
C. Create information	See 4B			
D. Gather existing information	See 4B			
E. Write report	See 4B			
Initial notification of applicability ^e	4	1	4	0
Notification of compliance status ^e	8	1	8	0
Notification of construction/reconstruction ^e	N/A			
Notification of actual startup ^e	N/A			
Notification of foundry reclassification ^h	1	0	0	0
Request for compliance extension ^c	N/A			
Notification of repeat PM performance test ^c	1	0.2	0.2	75
Site specific test plan ^e	0	0	0	0
Notification of performance evaluation ^e	N/A			
Quality assurance plan for CEMS/COMS ^e	N/A			
NESHAP waiver request ^e	N/A			
Startup, shutdown, and malfunction plan/reports	N/A			
Report of performance test (through CEDRI using ERT) ^c	8	0.2	1.6	75
Semiannual compliance reports ⁱ	8	2	16	75
Subtotal for Reporting Requirements				
5. Recordkeeping Requirements				
A. Familiarization with Regulatory Requirements	See 4A			
B. Plan activities ^j	4	1	4	25
C. Implement activities ^j	4	1	4	25
D. Develop record system ^j	2	1	2	25
E. Time to enter information ^k	0.5	52	26	75
F. Time to transmit or disclose information ^k	0.25	2	0.5	75
G. Time to adjust existing ways ^j	2	1	2	25

F. Time to train personnel ^j	4	1	4	25
G. Time for audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded)^l				
TOTAL CAPITAL AND O&M COST (rounded)^l				
GRAND TOTAL (rounded)^l				

Assumptions:

- ^a This table is specific to area source foundries classified as large iron and steel foundries. There are an estimated 390 area source foundries.
- ^b This ICR uses the following labor rates from the United States Department of Labor, Bureau of Labor Statistics, May 2018, mean labor rates for manufacturing.
- ^c We have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal metal.
- ^d We have assumed that all foundries would need to conduct performance tests to demonstrate compliance with the opacity limit in §63.11-10.
- ^e One-time only costs
- ^f We have assumed that all large foundries must conduct inspection of control device and capture system.
- ^g We assumed half of the large area source foundries ($75/2 = 37.5$) would use the emissions averaging provisions.
- ^h We have assumed that no foundries will be reclassified as small foundries.
- ⁱ We have assumed all large foundries will have to submit semi-annual compliance reports.
- ^j We have assumed that all large foundries would review record keeping system, adjust methods and train employees during the first year.
- ^k We have assumed that large foundries must record information to demonstrate compliance with pollution prevention management practices.
- ^l Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Large foundries are not assumed to incur costs for recordkeeping requirements.

subpart ZZZZ) (Proposed Amendments)

	81.33	123.71	42.8	
(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b	
75	3.8	7.5	\$6,885	
1050.0	52.50	105.00	\$96,385	
450.0	22.50	45.00	\$41,308	
0	0	0	\$0	
0	0	0	\$0	
0	0	0	\$0	
0	0	0	\$0	
1800	90	180	\$165,232	
112.5	5.625	11.25	\$10,327	
0	0	0	\$0	
0	0	0	\$0	
0	0	0	\$0	
15.0	0.75	1.50	\$1,377	
0	0	0	\$0	
120.0	6.00	12.00	\$11,015	
1200	60.0	120.0	\$110,155	
5,546			\$442,684	
100	5	10	9180	
100	5	10	9180	
50	3	5	4590	
1,950	97.5	195.0	\$179,001	
38	1.9	3.8	\$3,442	
50	3	5	\$4,590	

ERG comment on changes

RTI Comment

Don't use full

Added this as an ongoing burden per OMB requirement, bOK

Increased the
Increased the

This essential

added footnote h, one-time

added footnote h, one-time

added footnote h, one-time

added footnote h, one-time

added footnote h, one-time

added footnote j

no longer req

added footnote j

100	5.0	10.0	\$9,180
2,746		219,162	
8,290		662,000	
		\$0	
8,290		\$662,000	

ies, 75 of which are expected to be classified as large foundries. No new area source foundries are projected during the 3-year term c
r rates for Foundries (NAICS 331500) for Management Occupations (11-0000), Environmental Engineer (17-2081) and Office and /
lting furnace subject to a PM or total metal HAP limit in §63.10895(c) at least every 5 years (or 0.2 averaged on a yearly basis) and v
10895(e) at least every 6 months and will not implement a process change likely to increase fugitive emissions over the 3 year period

r of the rule amendments. Subsequent years, these activities would not be needed. Therefore, the average number of renew footnote
:tics for metallic scrap and binder formulations and information to demonstrate compliance with monitoring; inspecti(added footno
ur any capital or O&M costs. reabeled to k

Salaries taken for NAICS 331500: Foundries

May 2018 https://www.bls.gov/oes/current/naics4_331500.htm

Occupation Code	Title	Mean Hourly Rate	Estimated Total Pay with Benefits
compensator 11-0000	Mgmt Occup	58.91	123.71
17-2081	Envir Engr	38.73	81.33
43-0000	Office and Ad	20.38	42.8

hours to do test, consistent with 40 CFR 63 subpart EEEEE

hours to do test, one observation spot

ly a one time requirement. Once change system, no real on-going burden.

uired

of this ICR. We assume all respondents will have to spend time familiarizing themselves with regulatory requirements each year. Administrative Support (43-0000) . The rates have been increased by 110 percent to account for the benefit packages available to those employees who will not implement a performance test due to a change to an operating limit or a process change likely to increase HAP emissions over the period of this ICR. Opacity performance tests should be conducted over 3-hour period as specified in §63.6(h)(5)(ii). Assume one observation location

i
te j
:

oyed by private industry. Fully burdened hourly rates are: \$123.71 for management; \$81.33 for technical; and \$42.80 for clerical.
riod of this ICR. A notification is required.
tion can be used per foundry. No separate notification required.

Capital/Startup vs. Operation and Maintenance (O&M) Costs

(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 ^a
Leak detectors	\$9,000	0	\$0	\$1,470	0
Flow rate monitors	\$7,500	0	\$0	\$2,000	0
Pressure drop	\$7,500	0	\$0	\$2,000	0
Total ^b			\$0		

^a PM control system O&M cost are only applicable to large iron and steel foundries, of which there are 75. Assumes 2

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

(G)
Total O&M, (E x F)
\$0
\$0
\$0
\$0

0 foundries use a wet scrubber and the remainder use a baghouse.

Table 1c: Annual Respondent Burden and Cost for All Foundries – NESHAP for Iron and Steel Foundry Area So

Category	Reporting Hours	Recordkeeping Hours	Total Labor Hours	Labor Cost
Small Foundry	3,079	3,031	6,110	\$488,000
Large Foundry	5,546	2,746	8,290	\$662,000
Total	8,625	5,776	14,400	\$1,150,000

18 hr per resp

urces (40 CFR Part 63, Subpart ZZZZ) (Renewal)

Number of Response
630
180
810

Table 2: Average Annual EPA Burden and Cost - NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZ) (I

2019: \$49.44 \$66.62

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (AxB)	(D) Plants per year ^a	(E) Technical person-hours per year (Cx D)	(F) Management person-hours per year (Ex0.05)
Report Review:						
Initial notification of applicability ^c	1	1	1	0	0	0
Notification of compliance status ^c	2	1	2	0	0	0
Notification of performance test ^d	1	0.2	0.2	75	15.0	0.75
Performance test report ^d	2	0.2	0.4	75	30.0	1.50
Semiannual compliance report - small ^a	1	2	2	315	630	31.5
Semiannual compliance report - large ^a	2	2	4	75	300	15.0
TOTAL BURDEN AND COST (rounded) ^e						1,121

Assumptions:

- ^a Taking into account shutdown data for foundries, we have assumed that there are 390 existing iron and steel foundries that are area sources.
- ^b This cost is based on the following 2019 labor rates which incorporates a 1.6 benefits multiplication factor to account for government workers.
- ^c One-time only costs
- ^d We have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal.
- ^e Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Agency Worker Rates	Base Rates, \$	% Overhead	Total, \$/hr
Managerial (GS-13, step 5)	\$41.64	\$24.98	\$66.62
Technical (GS-12, step 1)	\$30.90	\$18.54	\$49.44
Clerical (GS-6, step 3)	\$16.72	\$10.03	\$26.75

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS_h.pdf

Effective January 2019

Renewal)

\$26.75

(G) Clerical person-hours per year (Ex0.1)	(H) Cost, \$^b
0	0
0	\$0
1.50	\$831.70
3.00	\$1,663.39
63.0	\$34,931.23
30.0	\$16,633.92
	\$54,100

sources. No new sources are projected d
t overhead expenses: \$66.62 Manageria

melting furnace subject to a PM or total 1

During the 3-year term of this ICR. A total of 315 of the 390 facilities are small foundries and 75 are large foundries. All foundries have to pay a Clerical rate (GS-6, Step 3), \$26.75 Technical rate (GS-12, Step 1), and \$49.44 Clerical rate (GS-6, Step 3). These rates are calculated from the total metal HAP limit in §63.10895(c) at least every 5 years (or 0.2 averaged on a yearly basis) and will not implement a performance test due

submit semiannual compliance reports.

hourly rates included in the Office of Personnel Management (OPM) 2019 General Schedule which excludes locality rates of pay; the rates

to change to an operating limit or a process change likely to increase HAP emissions.

; have been increased by 60 percent to account for benefit packages available to government employees.

(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
Notification of Compliance Status	0	0	0
Notification of Foundry Reclassification	0	0	0
Notification of Performance Test for PM (large foundries) ^a	75	0.2	0
Report of Performance Test for PM (large foundries) ^a	75	0.2	1
Semiannual compliance reports (small foundries)	315	2	0
Semiannual compliance reports (large foundries)	75	2	0
			Total

(E)

Total Annual Responses

$$E=(B \times C)+D$$

0

0

0

15

15

630

150

810

	Current ICR (2267.05)				
	<u>Number of Sources</u>	<u>Distribution</u>	<u>Number of Small Entity</u>	<u>Basis</u>	<u>Number of Sources</u>
Total	392	1.00	303		390
<i>small</i>	316	0.81	269	85% of small foundries are small entities	315
<i>large</i>	76	0.19	34	45% of large foundries are small entities	75

Revised ICR (2267.06)

<u>Basis</u>	<u>Number of Small Entity</u>	<u>Basis</u>
Total count gone down consistently, assumed two more drop. One small and one large		
revised small count	268	85% of small foundries are small entities
revised large count	34	45% of large foundries are small entities

Table 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foundries

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. Surveys and Studies	N/A		
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A		
4. Reporting Requirements			
A. Familiarization with Regulatory Requirements ^a	0.5	1	0.5
B. Required activities			
Repeat performance tests for opacity	N/A		
Scrap specifications ^c	4	1	4
Monthly emission averaging calculation	N/A		
No methanol binder formulation ^d	0	0	0
C. Create information	See 4B		
D. Gather existing information	See 4B		
E. Write report	See 4B		
Initial notification of applicability ^c	2	1	2
Notification of compliance status ^c	4	1	4
Notification of construction/reconstruction ^c	N/A		
Notification of actual startup ^c	N/A		
Notification of foundry reclassification ^e	1	0	0
Request for compliance extension ^c	N/A		
Notification of repeat performance test	N/A		
Site specific test plan	N/A		
Notification of performance evaluation	N/A		
Quality assurance plan for CEMS/COMS	N/A		
NESHAP waiver request ^c	N/A		
Startup, shutdown, and malfunction plan/reports	N/A		
Report of performance test (through CEDRI using ERT) ^c	N/A		
Semiannual compliance reports	4	2	8
Subtotal for Reporting Requirements			
5. Recordkeeping Requirements			
A. Familiarization with Regulatory Requirements	See 4A		
B. Plan activities ^f	2	1	2
C. Implement activities ^f	2	1	2
D. Develop record system ^f	1	1	1
E. Time to enter information ^g	0.1	52	5.2
F. Time to transmit or disclose information	0.25	2	0.5
G. Time to adjust existing ways ^f	1	1	1
F. Time to train personnel ^f	2	1	2
G. Time for audits	N/A		
Subtotal for Recordkeeping Requirements			

TOTAL LABOR BURDEN AND COST (rounded)^h			
TOTAL CAPITAL AND O&M COST (rounded)^h			
GRAND TOTAL (rounded)^h			

Assumptions:

^a This table is specific to area source foundries classified as small iron and steel foundries. A total of 315 of the 390 area s

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	970	\$77,000
		\$0
	970	\$77,000

source foundries are small foundries and 75 are large foundries. No new area source foundries are projected during 2018, mean labor rates for Foundries (NAICS 331500) for Management Occupations (11-0000), Environmental Health and Safety Technicians (29-9000), and Environmental Protection Technicians (29-9000).

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During the first year of the rule amendments. Subsequent years, these activities would not be needed. Therefore, the management practices for metallic scrap and binder formulations.

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4. Reporting Requirements				
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Initial and periodic inspections of PM control devices, monthly inspection of capture systems ^f	2	12	24	
Monthly emissions averaging calculations ^g	0.25	12	3	
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Notification of actual startup ^e	N/A			
Notification of foundry reclassification ^h	1	0	0	0
Request for compliance extension ^c	N/A			
Notification of repeat PM performance test ^c	1	0.2	0.2	
Site specific test plan ^e	0	0	0	0
Notification of performance evaluation ^e	N/A			
Quality assurance plan for CEMS/COMS ^e	N/A			
NESHAP waiver request ^t	N/A			
Startup, shutdown, and malfunction plan/reports	N/A			
Report of performance test (through CEDRI using ERT) ^c	8	0.2	1.6	75
Semiannual compliance reports ⁱ	8	2	16	0
Subtotal for Reporting Requirements				
5. Recordkeeping Requirements				
A. Familiarization with Regulatory Requirements	See 4A			
B. Plan activities ^j	4	1	4	25
C. Implement activities ^j	4	1	4	25
D. Develop record system ^j	2	1	2	25
E. Time to enter information ^k	0.5	52	26	
F. Time to transmit or disclose information ^k	0.25	2	0.5	
G. Time to adjust existing ways ^j	2	1	2	25
F. Time to train personnel ^j	4	1	4	25
G. Time for audits	N/A			
Subtotal for Recordkeeping Requirements				

TOTAL LABOR BURDEN AND COST (rounded)^l				
TOTAL CAPITAL AND O&M COST (rounded)^l				
GRAND TOTAL (rounded)^l				

Assumptions:

- ^a This table is specific to area source foundries classified as large iron and steel foundries. There are an estimated 390 area source foundr
- ^b This ICR uses the following labor rates from the United States Department of Labor, Bureau of Labor Statistics, May 2018, mean labor
- ^c We have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal me
- ^d We have assumed that all foundries would need to conduct performance tests to demonstrate compliance with the opacity limit in §63.1
- ^e One-time only costs
- ^f We have assumed that all large foundries must conduct inspection of control device and capture system.
- ^g We assumed half of the large area source foundries ($75/2 = 37.5$) would use the emissions averaging provisions.
- ^h We have assumed that no foundries will be reclassified as small foundries.
- ⁱ We have assumed all large foundries will have to submit semi-annual compliance reports.
- ^j We have assumed that all large foundries would review record keeping system, adjust methods and train employees during the first yea
- ^k We have assumed that large foundries must record information to demonstrate compliance with pollution prevention management prac
- ^l Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Large foundries are not assumed to inci

Subpart ZZZZ (Renewal)

81.33 123.71 42.8

(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
0	0.0	0.0	\$0.00
0.0	0.00	0.00	\$0.00
0.0	0.00	0.00	\$0.00
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	0.00	0.00	\$0.00
0	0	0	\$0
120.0	6.00	12.00	\$11,015.46
0	0.0	0.0	\$0.00
138			\$11,015
100	5	10	9180
100	5	10	9180
50	3	5	4590
0	0.0	0.0	\$0.00
0	0.0	0.0	\$0.00
50	3	5	\$4,590
100	5.0	10.0	\$9,179.55
460			36,718

ERG comment on changes

RTI Comment

Don't use full

Added this as an ongoing burden per OMB requirement, b

OK

Increased the
Increased the

This essential

added footnote h, one-time

added footnote h, one-time

added footnote h, one-time

added footnote h, one-time

added footnote h, one-time

added footnote j

no longer req

added footnote j

600	48,000
	\$0
600	\$48,000

ies, 75 of which are expected to be classified as large foundries. No new area source foundries are projected during the 3-year term
r rates for Foundries (NAICS 331500) for Management Occupations (11-0000), Environmental Engineer (17-2081) and Office and /
lting furnace subject to a PM or total metal HAP limit in §63.10895(c) at least every 5 years (or 0.2 averaged on a yearly basis) and /
10895(e) at least every 6 months and will not implement a process change likely to increase fugitive emissions over the 3 year period

r of the rule amendments. Subsequent years, these activities would not be needed. Therefore, the average number of renew footnote
:ices for metallic scrap and binder formulations and information to demonstrate compliance with monitoring; inspecti(added footno
ur any capital or O&M costs. re-labeled to k

Salaries taken for NAICS 331500: Foundries

May 2018 https://www.bls.gov/oes/current/naics4_331500.htm

Occupation Code	Title	Mean Hourly Rate	Estimated Total Pay with Benefits
compensator 11-0000	Mgmt Occup	58.91	123.71
17-2081	Envir Engr	38.73	81.33
43-0000	Office and Ad	20.38	42.8

hours to do test, consistent with 40 CFR 63 subpart EEEEE

hours to do test, one observation spot

ly a one time requirement. Once change system, no real on-going burden.

uired

of this ICR. We assume all respondents will have to spend time familiarizing themselves with regulatory requirements each year. Administrative Support (43-0000) . The rates have been increased by 110 percent to account for the benefit packages available. We will not implement a performance test due to a change to an operating limit or a process change likely to increase HAP emissions. This ICR. Opacity performance tests should be conducted over 3-hour period as specified in §63.6(h)(5)(ii). Assume one of

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to those employed by private industry. Fully burdened hourly rates are: \$123.71 for management; \$81.33 for technical; and \$4:

ns over the period of this ICR. A notification is required.

reservation location can be used per foundry. No separate notification required.

2.80 for clerical.