SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Electric Arc Furnace Steelmaking Facilities (40 CFR part 63, subpart YYYYY) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Electric Arc Furnace Steelmaking Facilities (40 CFR part 63, subpart YYYYY) (Renewal), EPA ICR Number 2277.06, OMB Control Number 2060-0608.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) were proposed on September 20, 2007, and promulgated on December 28, 2007. These regulations apply to existing facilities and new Electric Arc Furnace (EAF) steelmaking facilities that are area sources of hazardous air pollutants (HAP) emissions. These standards establish particulate matter (PM) emission limits for control devices and opacity limits for melt shops, pollution prevention requirements for ferrous scrap that is melted in EAFs, and monitoring, reporting, and recordkeeping requirements. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart YYYYY.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, 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 affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain the file for at least five years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

There are approximately 78 EAF facilities, which are owned and operated by the iron and steel mill industry. None of the 78 facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries. The ‘burden’ to the “Affected Public” may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal). The ‘burden’ to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found in Table 2: Average Annual EPA Burden and Cost

– NESHAP for Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal).

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 79.6 respondents per year will be subject to these standards, and 1.6 additional respondents per year will become subject to these same standards, for an overall average of 81.2 respondents per year.

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

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to either new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/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.

In the Administrator's judgment, HAP emissions from EAF steelmaking facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart YYYYY.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required to determine an affected facility's initial capability to comply with these emission standards. Continuous emission monitors are used to ensure compliance with these standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform either the Agency or its 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 that the standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

3. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart YYYYY.

3(a) Non-duplication

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, duplication does not exist.

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

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (85 FR 28003) on May 12, 2020. No comments were received on the burden published in the *Federal Register* for this renewal.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately an average of 81.2 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the 'burden' associated with these standards as they were being developed and that these standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Steel Manufacturers Association (SMA), at (202) 296-1515, and the American Iron and Steel Institute (AISI), at (202) 452-7180. The AISI reviewed and offered updates to the existing facility EAF facility list. No input was received from SMA.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

3(d) Effects of Less-Frequent Collection

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these 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 was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

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

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

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are EAF steelmaking facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3312 which corresponds to the North American Industry Classification System (NAICS) 331110 for Iron and Steel Mills and Ferroalloy Manufacturing.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported are required by the NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY).

A source must make the following reports:

Notifications	
Scrap management and pollution prevention plan	§§63.10685(a)(1) and (b)(1)
Startup, shutdown, and malfunction plan	§63.6(e)(3)
Notification of applicability	§63.9(b)(1)

Notifications	
Notification and application of construction or reconstruction	§63.9(b)(4)
Compliance extension	§63.9(c)
Notification of special requirements	§63.9(d)
Notification of performance test	§§63.7(b), 63.9(e)
Notification of opacity and visible emission observations	§63.9(f)
Additional COMS notifications	§63.9(g)
Notification of compliance status	§§63.10690(b), 63.9(h)
Notification of actual startup	§63.9(b)

Reports	
Semiannual compliance reports	§§63.10685(c), 63.10(e)
Opacity or visible emissions observations results	§63.10(d)(3)
Startup, shutdown, malfunction report	§63.10(d)(5)
Additional CMS reports	§63.10(e)

A source must keep the following records:

Recordkeeping	
Notifications and reports	§§63.10685(c), 63.10(b)(2)(xiv)
Startups, shutdowns, malfunctions	§§63.6(e)(3)(iii)-(v), 63.10(b)(2)(i)-(ii)
Performance tests, performance evaluations, and opacity observations	§§63.10686(d), 63.10(b)(2)(viii)-(ix)
Scrap management requirements	§§63.10685(a)(1), 63.10685(b)(1)-(3) and 63.10685(c)
Continuous monitoring systems	§§63.10(c), 63.6(h)(7), 63.8(d)(3)
Maintenance on air pollution control and monitoring equipment	§63.10(b)(2)(iii)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure.
Perform initial performance test 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 collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for 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:

Agency Activities

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 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 standards 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 the 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. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. The 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 five years.

5(c) Small Entity Flexibility

A small entity for this industry is defined by the Small Business Administration as a firm having no more than 1,000 employees. The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Although these standards would not have a significant economic impact on the small entities, we tried to reduce the impact of the rule on small facilities. The EPA met with industry trade associations and company representatives to address any small business concerns during development of the final rule. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal).

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 neither conduct nor 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 three years from these recordkeeping and reporting requirements is estimated to be 4,000 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulations, Agency knowledge and experience with the NESHAP program, the previously-approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	$148.45 ($70.69 + 110%)
Technical	$121.46 ($57.84 + 110%)
Clerical	$60.23 ($28.68 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, "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 Operation and Maintenance Costs

The only costs to the regulated industry resulting from information collection activities required by the subject standards are labor costs which are addressed elsewhere in this ICR and capital/startup costs. The capital/startup costs are one-time costs when a facility becomes subject to these regulations and are associated with initial performance testing. There are no operation and maintenance costs.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Performance Testing[1]	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Method 5 Testing	$8,150	1.6	$13,040	$0	0	$0
Method 9 Testing	$1,510	1.6	$2,416	$0	0	$0
Total			$15,500			$0

[1] We assume all new respondents will be required to conduct initial Method 5 and Method 9 testing. Both Method 5 and Method 9 testing are usually conducted by a contractor.
Note: Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are $15,500. This is the total of column D in the above table.

There are no operation and maintenance (O&M) costs for this ICR.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be $15,500. These are the record-keeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA's overall compliance and enforcement program includes such activities as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be $14,000.

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

Managerial $68.37 (GS-13, Step 5, $42.73 + 60%)
Technical $50.72 (GS-12, Step 1, $31.70 + 60%)

Clerical $27.46 (GS-6, Step 3, $17.16 + 60%)

These rates are from the Office of Personnel Management (OPM), 2020 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 78 existing respondents will be subject to these standards. It is estimated that an additional 1.6 respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 81.2 per year.

The number of respondents is calculated using the following table that addresses the three 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 [1]	(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	1.6	78	0	0	79.6
2	1.6	79.6	0	0	81.2
3	1.6	81.2	0	0	82.8
Average	1.6	79.6	0	0	81.2

[1] New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 81.2.

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
Prepare scrap plan and scrap specifications	1.6	1	N/A	1.6
Initial performance tests	1.6	1	N/A	1.6
Notification of compliance status	1.6	1	N/A	1.6
Request for compliance extension	0	1	N/A	0
Notification of performance test	1.6	1	N/A	1.6
SSM report	81.2	1	N/A	81.2
Semiannual excess emissions reports	81.2	2	N/A	162.4
			Total	250

The number of Total Annual Responses is 250.

The total annual labor costs are $469,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal).

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 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 4,000 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal).

We assume that burdens for managerial tasks take 5% 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% 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 16 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $15,500. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 284 labor hours at a cost of $14,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal).

We assume that burdens for managerial tasks take 5% 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% 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

There is an adjustment decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This decrease is not due to any program changes. The decrease in burden from the most-recently approved ICR is due to a decrease in the number of affected existing facilities, as identified by a review of the EAF facility source list and by consulting with internal Agency experts at OAQPS. This change also results in an increase in capital/startup costs. The previous ICR did not account for any capital/startup costs as the growth rate for the industry was very low during that time period, so no initial compliance costs were associated with those standards. However, we expect that there will be 1.6 new respondents each year over the next three years, and the increase in capital/startup costs accounts for the cost of initial performance testing for those facilities. Despite this increase in capital/startup costs, the overall cost estimate for this burden has decreased due to a decrease in the number of currently-existing facilities.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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 neither conduct nor 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, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2013-0323. 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 to 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 Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC 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) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2013-0323 and OMB Control Number 2060-0608 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

Table 1: Annual Respondent Burden and Cost – NESHAP for Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (A x B)	(D) Respondents per year[a]	(E) Technical person-hours per year (C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost per year[b]
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	8	1	8	81.2	649.6	32.48	64.96	$87,634.61
B. Required activities								
Initial performance tests [c]								
Prepare scrap plan and scrap specifications[d]	4	1	4	1.6	6.4	0.32	0.64	$863
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Initial notification of applicability[d]	2	1	2	1.6	3.2	0.16	0.32	$432
Notification of compliance status[d]	2	1	2	1.6	3.2	0.16	0.32	$432
Request for compliance extension	N/A							
Notification of performance test [c]								
Startup, shutdown, and malfunction plan/reports[e]	4	1	4	81.2	324.8	16.24	32.48	$43,817.31
Semiannual excess emissions reports[e]	2	2	4	81.2	324.8	16.24	32.48	$43,817.31

Subtotal for Reporting Requirements					***1,509***			***$176,996***
5. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	See 4A							
B. Plan activities	See 4B							
C. Implement activities	See 4B							
D. Develop record system [d]	4	1	4	1.6	6.4	0.32	0.64	$863.40
E. Time to enter information [f]	0.5	52	26	81.2	2,111	105.56	211.12	$284,812.49
F. Time to transmit or disclose information[f]	0.25	2	0.5	81.2	40.6	2.03	4.06	$5,477.16
G. Time to adjust existing ways[d]	2	1	2	0	0	0	0	$0
F. Time to train personnel[d]	4	1	4	1.6	6.4	0.32	0.64	$863.40
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					***2,489***			***$292,016***
TOTAL LABOR BURDEN AND COSTS (rounded)[g]					**4,000**			**$469,000**
TOTAL CAPITAL AND O&M COST (rounded)[g]								***$15,500***
GRAND TOTAL (rounded)[g]								***$485,000***

Assumptions:

[a] There are 78 existing EAF steelmaking facilities, and we expect that there will be an average of 1.6 new facilities per year, for an annual average of 81.2 respondents per year. We assume that each respondent will have to familiarize with the regulatory requirements each year.

[b] This ICR uses the following labor rates: $148.45 for managerial labor, $121.46 for technical labor, and $60.23 for clerical labor. These rates are from the U.S. Department of Labor, Bureau of Labor Statistics, March 2020. The rates have been increased by 110 percent to account for overhead.

[c] All plants have conducted performance tests during the implementation period of the rule.

[d] After full implementation, existing facilities are not expected to experience any burden from these activities and 1.6 new facilities per year are expected to become subject to the rule over the 3-year period.

[e] Sources are required include in their semiannual reports the number of mercury switches removed or the weight of mercury recovered from the switches and properly managed, the estimated number of vehicles processed, an estimate of the percent of mercury switches recovered, and a certification that the recovered mercury switches were recycled at RCRA-permitted facilities, if they are subject to a site-specific plan for mercury. In addition, all sources must submit semiannual reports for the control of contaminants from scrap according to the requirements in §63.10(e). For start-up, shutdown, and malfunction, these semi-annual reports are only required if a startup or shutdown caused the source to exceed any applicable emission limitation in the relevant emission standards, or if a malfunction occurred during the reporting period.

This ICR assumes each source had one six-month period during each year that required a report.
[f] Assumed that each facility will update records weekly. The only transmission is the semi-annual report and the annual SSM report.
[g] 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 Electric Arc Furnace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal)

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (A x B)	(D) Plants per year[a]	(E) Technical person-hours per year (C x D)	(F) Management person-hours per year (E x 0.05)	(G) Clerical person-hours per year (E x 0.1)	(H) Cost, $[b]
Report Review								
Initial notification of applicability[c]	1	1	1	1.6	1.6	0.08	0.16	$91
Startup, shutdown, malfunction plan/report[d]	2	1	2	81.2	162.4	8.12	16.24	$9,238.04
Notification of compliance status[c]	1	1	1	1.6	1.6	0.08	0.16	$91
Semiannual excess emissions report	0.5	2	1	81.2	81.2	4.06	8.12	$4,619.02
TOTAL ANNUAL BURDEN AND COST (rounded)[e]					***284***			***$14,000***

Assumptions:

[a] There are 78 existing EAF steelmaking facilities and we expect that there will be an average of 1.6 new facilities per year, for an annual average of 81.2 respondents per year.

[b] This ICR uses the following average hourly labor rates: $68.37 for managerial (GS-13, Step 5, $42.73 × 1.6), $50.72 (GS-12, Step 1, $31.70 × 1.6) for technical and $27.46 (GS-6, Step 3, $17.16 × 1.6) for clerical. These rates are from the Office of Personnel Management (OPM) "2020 General Schedule" which excludes locality rates of pay.

[c] After full implementation, the agency is not expected to experience any burden from these activities because existing facilities are no longer expected to submit Initial notifications of applicability or Notifications of compliance status. 1.6 new facilities per year are expected to become subject to the rule over the 3-year period.

[d] This ICR assumes each source had one six-month period during each year that required a report.

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