Table 1: Annual Respondent Burden and Cost – NESHAP for Area Sources: Electric Arc Fur

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]
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
B. Required activities				
Initial performance tests [c]				
Prepare scrap plan and scrap specifications[d]	4	1	4	1.6
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
Notification of compliance status[d]	2	1	2	1.6
Request for compliance extension	N/A			
Notification of performance test [c]				
Startup, shutdown, and malfunction plan/reports[e]	4	1	4	81.2
Semiannual excess emissions reports[e]	2	2	4	81.2
Subtotal for Reporting Requirements				
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
E. Time to enter information [f]	0.5	52	26	81.2
F. Time to transmit or disclose information[f]	0.25	2	0.5	81.2
G. Time to adjust existing ways[d]	2	1	2	0
F. Time to train personnel[d]	4	1	4	1.6
G. Time for audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded)[g]				
TOTAL CAPITAL AND O&M COST (rounded)[g]				
GRAND TOTAL (rounded)[g]				

Assumptions:

[a] There are 78 existing EAF steelmaking facilities and we expect that there will be an average of 1.6 new facilities per y 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 cler 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 ne
over the 3-year period.

[e] Sources are required include in their semiannual reports the number of mercury switches removed or the weight of me
estimated number of vehicles processed, an estimate of the percent of mercury switches recovered, and a certification th
permitted facilities, if they are subject to a site-specific plan for mercury. In addition all sources must submit semiannua
the requirements in §63.10(e). For start-up, shutdown, and malfunction, these semi-annual reports are only required if a
emission limitation in the relevant emission standards, or if a malfunction occurred during the reporting period. This IC
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

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

·nace Steelmaking Facilities (40 CFR Part 63, Subpart YYYYY) (Renewal)

March 2020 Labor Rates

121.46 148.45 60.23

(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]
649.6	32.48	64.96	$87,634.61
6.4	0.32	0.64	$863
3.2	0.16	0.32	$432
3.2	0.16	0.32	$432
324.8	16.24	32.48	$43,817.31
324.8	16.24	32.48	$43,817.31
1,509			***$176,996***
6.4	0.32	0.64	$863.40
2,111	105.56	211.12	$284,812.49
40.6	2.03	4.06	$5,477.16
0	0	0	$0
6.4	0.32	0.64	$863.40
2,489			***$292,016***
4,000			**$469,000**
			$15,500
			$485,000

·ear, for an annual average of 81.2 respondents per year. We

·ical labor. These rates are from the U.S. Department of Labor,

ew facilities per year are expected to become subject to the rule

rcury recovered from the switches and properly managed, the
ıat the recovered mercury switches were recycled at RCRA-
ıl reports for the control of contaminants from scrap according to
startup or shutdown caused the source to exceed any applicable
R assumes each source had one six-month period during each

SSM report.

Total Responses	250
Hours per response	16.0

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]
Report Review				
Initial notification of applicability[c]	1	1	1	1.6
Startup, shutdown, malfunction plan/report[d]	2	1	2	81.2
Notification of compliance status[c]	1	1	1	1.6
Semiannual excess emissions report	0.5	2	1	81.2
TOTAL ANNUAL BURDEN AND COST (rounded)[e]				

[a] There are 76 existing EAF steelmaking facilities and we expect that there will be an average of 1.6 new facilities pe
year.

[b] This ICR uses the following average hourly labor rates: $68.37 for managerial (GS-13, Step 5, $42.73 × 1.6), $50.7
$27.46 (GS-6, Step 3, $17.16 × 1.6) for clerical. These rates are from the Office of Personnel Management (OPM) "
of pay.

[c] After full implementation, the agency is not expected to experience any burden from these activities because existin
notifications of applicability or Notifications of compliance status. 1.6 new facilities per year are expected to become

[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.

2020 Schedule

50.72 68.37 27.46

(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]
1.6	0.08	0.16	$91
162.4	8.12	16.24	$9,238.04
1.6	0.08	0.16	$91
81.2	4.06	8.12	$4,619.02
284			***$14,000***

1 year, for an annual average of 81.2 respondents per

2 (GS-12, Step 1, $31.70 × 1.6) for technical and
2020 General Schedule" which excludes locality rates

ıg facilities are no longer expected to submit Initial
subject to the rule over the 3-year period.

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents [1]	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents
1	1.6	78	0	0
2	1.6	79.6	0	0
3	1.6	81.2	0	0
Average	**1.6**	**79.6**	**0**	**0**

[1] This ICR assumes there are 78 existing respondents, and approximately 5 new respondents over the next three y
1.6 new respondents per year.)

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	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 (rounded)				250

(E)
Number of Respondents (E=A+B+C-D)
79.6
81.2
82.8
81.2

ears (or approximately

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Performance Testing[1]	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	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.