

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Ferroalloys Production Area Sources (40 CFR Part 63, Subpart YYYYYY)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Ferroalloys Production Area Sources (40 CFR Part 63, Subpart YYYYYY) (Renewal), EPA ICR Number 2303.06, OMB Control Number 2060-0625.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Ferroalloys Production Area Sources (40 CFR Part 63, Subpart YYYYYY) were proposed on September 15, 2008 (73 FR 53163), and promulgated on December 23, 2008 (73 FR 78637). These regulations apply to existing and new ferroalloy production facilities that are an area source of hazardous air pollutant (HAP) emissions. A ferroalloys production facility manufactures silicon metal, ferrosilicon, ferrotitanium using the aluminum reduction process, ferrovanadium, ferromolybdenum, calcium silicon, silicomanganese zirconium, ferrochrome silicon, silvery iron, high-carbon ferrochrome, charge chrome, standard ferromanganese, ferromanganese silicon, calcium carbide or other ferroalloy products using electrometallurgical operations, including electric arc furnaces (EAFs) or other reaction vessels. New facilities include those that commenced either construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart YYYYYY.

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 these 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 9 ferroalloy production area source facilities, which are owned and operated by the ferroalloy production industry. None of these 9 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. The 'burden' to the Affected Public may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP

for Ferroalloys Production Area Sources (40 CFR Part 63, Subpart YYYYYY) (Renewal). The ‘burden’ to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and can be found at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Ferroalloys Production Area Sources (40 CFR Part 63, Subpart YYYYYY) (Renewal). We assume that they will all respond to EPA inquiries.

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 9 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. This ICR reflects a reduction in the number of respondents based on a review of facilities listed in the 2008 final rule docket that remain in operation.

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 both new and 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, hazardous air pollutant emissions from ferroalloys production area sources 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 YYYYYY.

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 in order to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with these same standards at all times.

The notifications required in these standards are used to inform the Agency or its delegated authority when a source becomes subject to the requirements of these 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 annual 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 YYYYYY.

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 9 respondents will be subject to these standards over the three-year period covered by this ICR. This ICR reflects a reduction in the number of respondents based on a review of facilities listed in the 2008 final rule docket that remain in operation.

Industry trade associations and other interested parties were provided an opportunity to comment on the 'burden' associated with these standards as they were being developed and that the standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted Carbide Industries LLC, at (502) 775-4100; Elkem Metals, at (412) 299-7200; Oxbow Carbon and Minerals LLC, at (561) 907-5400; and Tennessee Alloys Co. LLC, at (256) 495-2285.

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 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 ferroalloys production facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below:

Standard (40 CFR Part 63, Subpart YYYYYY)	SIC Codes	NAICS Codes
Nonferrous Metal (except Aluminum) Smelting and Refining	3339	331410
Electrometallurgical Ferroalloy Manufacturing	3313	331110
Secondary Smelting, Refining, and Alloying of Nonferrous Metal (except Copper and Aluminum)	3341, 3399	331492

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Ferroalloys Production Area Sources (40 CFR Part 63, Subpart YYYYYY).

A source must make the following reports:

Notifications	
Notification of applicability	§63.9(b)(2), §63.11529(a)

Notifications	
Notification of construction/reconstruction	§63.9(b)(5)
Notification of special compliance requirements	§63.9(d)
Notification of performance test	§63.9(e)
Notification of opacity/VE observations	§63.9(f)
Additional CMS notifications	§63.9(g)
Notification of compliance status	§63.9(h), §63.11529(b)
Notification of changes in information	§63.9(j)

Reports	
SSM plan	§63.6(e)(3)
Bag leak detection system monitoring plan	§63.11527(a)(5)
CMS quality control plan	§63.8(d)
CMS performance evaluation test plan	§63.8(e)(3)
CMS performance evaluation/report	§63.8(e)(5)
SSM report	§63.6(e)(3)
Excess emissions reports	§63.10(e)(3)
Annual compliance certifications	§63.11529(c)

A source must keep the following records:

Recordkeeping	
Records of notifications	§63.10, §63.11529(d)(1)
Records that demonstrate continuous compliance	§63.10, §63.11529(d)(2)
Monitoring information	§63.10, §63.11529(d)(2)
Keep records for five years. Keep records onsite for two years.	§§63.11529(f)-(g)

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 pressure drop and flow rate for each wet scrubber or a bag leak detection system for fabric filters.
Perform initial performance test, Reference Method 9 and 22 tests, 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 visual emissions compliance demonstrations and 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. Visual emissions compliance demonstrations and performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard 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 annual 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 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

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. 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 Ferroalloys Production Area Sources (40 CFR Part 63, Subpart YYYYYY) (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 362 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, 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. There are no capital/startup or operation and maintenance costs.

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

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance 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 \$1,250.

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 Ferroalloys Production Area Sources (40 CFR Part 63, Subpart YYYYYYY) (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 9 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 9 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 ^a	(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	0	9	0	0	9
2	0	9	0	0	9
3	0	9	0	0	9
Average	0	9	0	0	9

^a 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 9.

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
One-time initial notification	0	1	0	0
One-time notifications of compliance status	0	1	0	0
Annual compliance certifications	9	1	0	9
Annual reports of exceedances	2	1	0	2
TOTAL				11

The number of Total Annual Responses is 11.

The total annual labor costs are \$42,500.00 (rounded). Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Ferroalloys Production Area Sources (40 CFR Part 63, Subpart YYYYYY) (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 362 hours. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost – NESHAP for Ferroalloys Production Area Sources (40 CFR Part 63, Subpart YYYYYY) (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 33 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. 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 25 labor hours at a cost of \$1,250; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Ferroalloys Production Area Sources (40 CFR Part 63, Subpart YYYYYYY) (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 a small decrease in burden from the most-recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This decrease is not due to any program changes. This ICR reflects a reduction in the number of respondents based on a review of facilities listed in the 2008 final rule docket that remain in operation. A review of these facilities revealed that one of the existing ten companies has shut down, while remaining facilities appear to continue to be in operation. The growth rate for this industry is very low or non-existent, so no new companies are expected to become subject to this NESHAP during the three-year period of this ICR. There are no changes in the capital/startup or operation and maintenance (O&M) costs. There is a slight increase in labor costs, which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (March 2020) to calculate respondent burden costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 33 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-2014-0099. 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-2014-0099 and OMB Control Number 2060-0625 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 Ferroalloys Production Area Sources (40 CFR Part 63, Subpart YYYYYY) (Renewal).

Burden item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent (A x B)	(D) Respondents per year	(E) Technical person-hour per year (C x D)	(F) Management person-hour per year (E x 0.05)	(G) Clerical person-hour per year (E x 0.10)	(H) Total Cost per year ^a
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, & Utilization of Tech. & Systems ^b	40	1	40	0	0	0	0	\$0
4. Reporting Requirements								
A. Familiarize with regulatory requirements ^c	4	1	4	9	36	1.8	3.6	\$4,856.60
B. Required Activities								
One-time activity, Initial control device Method 22 Planning	N/A							
One-time activity, Initial control device Method 22 Test	N/A							
Periodic control device Method 22 ^d	2	2	4	18	72	3.6	7.2	\$9,713.20
Retest control device ^d	2	1	2	1	2	0.1	0.2	\$269.81
Weekly VE check ^d	0.1	52	5.2	18	93.6	4.68	9.36	\$12,627.15
One-time activity, initial building opacity Method 9 ^e	N/A							
Periodic (semi-annual) building VE Method 22 ^d	2	2	4	9	36	1.8	3.6	\$4,856.60
Retest building opacity Method 9 ^e	N/A							
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write Report	See 4B							
Initial Notification ^b	2	1	2	0	0	0	0	\$0
Notification of Compliance	4	1	4	0	0	0	0	\$0

Status ^b								
Annual Compliance Certification ^f	4	1	4	9	36	1.8	3.6	\$4,856.60
Report of Exceedances ^g	2	1	2	2	4	0.2	0.4	\$539.62
Subtotal for Reporting Requirements					322			\$37,720
5. Recordkeeping Requirements								
A. Familiarize with regulatory requirements	See 4A							
B. Plan activities	See 5E							
C. Implement activities	See 5E							
D. Develop record system	See 5E							
E. Time to enter information								
Records of all info. required by standards ^h	0.3	12	3.6	9	32.4	1.62	3.24	\$4,370.94
F. Time to train personnel	N/A							
G. Time to adjust existing ways to comply w/ prev. appl. req.	N/A							
H. Time to transmit or disclose information ⁱ	0.3	1	0.3	9	2.7	0.135	0.27	\$364.24
I. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					40			\$4,735
Total Labor Burden and Costs (rounded) ^j					362			\$42,500
Total Capital and O&M Cost (rounded) ^j								\$0
GRAND TOTAL (rounded) ^j								\$42,500

Assumptions:

^a This ICR uses the following labor rates for privately-owned sources: \$148.45 for managerial, \$121.46 for technical, and \$60.23 for clerical labor. 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.

^b This is a one-time activity and there are no new sources anticipated to become subject to the standard during this ICR renewal period.

- ^c We have assumed that there are approximately 9 existing sources that are subject to the standard, with no new facilities per year. We assume that each respondent will have to familiarize with the regulatory requirements each year.
- ^d We have estimated 18 control devices requiring Method 22 testing and visual emission inspection at the 9 existing sources. It is also assumed that one of these control devices will require a re-test. On building-wide testing, it is assumed that each of the 9 existing sources has one building per source and that all buildings will require a re-test.
- ^e One-time activity. Assume the facilities hire a contractor.
- ^f The 9 existing plants would be required to submit an Annual Compliance Certification each year.
- ^g Assumes that 2 facilities per year would have to submit a report of exceedance.
- ^h Recordkeeping requirements cover all existing plants.
- ⁱ Transmittals would include Annual Compliance Certifications for 9 plants.
- ^j 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 Ferroalloys Production Area Sources (40 CFR Part 63, Subpart YYYYYY) (Renewal).

Activity	(A) Person- hours per occurrenc e	(B) No. of occurrences per respondent per year	(C) Person- hours per responde nt (A x B)	(D) Respondents per year	(E) Technical person- hours (C x D)	(F) Managerial person- hours (E x 0.05)	(G) Clerical person- hours (E x 0.10)	(H) Cost, \$ ^a
Report Review:								
Initial Notification of applicability ^b	1	1	1	0	0	0	0	\$0
Notification of Compliance Status ^c	2	1	2	0	0	0	0	\$0
Annual Compliance Certification ^d	2	1	2	9	18	1	1.8	\$1,023.92
Annual Report of Deviations ^e	2	1	2	2	4	0.2	0.4	\$227.54
TOTAL (rounded)^f						25		\$1,250

Assumptions:

^a This ICR uses the following labor rates: \$68.37 for managerial, \$50.72 for technical, and \$27.46 for clerical labor. 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 government employees.

^b This is a one-time requirement. All 9 plants have already submitted initial notification during the initial compliance period.

^c This is a one-time requirement. All 9 plants have submitted the notification of compliance status during the initial compliance period.

^d All 10 plants will submit an annual compliance certification each year.

^e Assumes that 2 facilities per year would have to submit an exceedance report per year.

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