

**Table 1. Annual Respondent Burden and Cost - NESHAP for Ferroalloys Production**

<b>Burden item</b>	<b>(A) Person-hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>
1. Applications	N/A	
2. Survey and Studies	N/A	
3. Acquisition, Installation, & Utilization of Tech. & Systems <sup>b</sup>	40	1
4. Reporting Requirements		
A. Familiarize with regulatory requirements <sup>c</sup>	4	1
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 <sup>d</sup>	2	2
Retest control device <sup>d</sup>	2	1
Weekly VE check <sup>d</sup>	0.1	52
One-time activity, initial building opacity Method 9 <sup>e</sup>	N/A	
Periodic (semi-annual) building VE Method 22 <sup>d</sup>	2	2
Retest building opacity Method 9 <sup>e</sup>	N/A	
C. Create information	See 4B	
D. Gather existing information	See 4B	
E. Write Report	See 4B	
Initial Notification <sup>b</sup>	2	1
Notification of Compliance Status <sup>b</sup>	4	1
Annual Compliance Certification <sup>f</sup>	4	1
Report of Exceedances <sup>g</sup>	2	1
<b>Subtotal for Reporting Requirements</b>		
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 <sup>h</sup>	0.3	12
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 <sup>i</sup>	0.3	1
I. Time for audits	N/A	
<b>Subtotal for Recordkeeping Requirements</b>		
<b>Total Labor Burden and Costs (rounded)<sup>j</sup></b>		
<b>Total Capital and O&amp;M Cost (rounded)<sup>j</sup></b>		
<b>GRAND TOTAL (rounded)<sup>j</sup></b>		

**Assumptions:**

<sup>a</sup> This ICR uses the following labor rates for privately-owned sources: \$148.45 for managerial, \$121.46 for technical, and \$100.00 for non-managerial/technical. Source: Bureau of Labor Statistics, March 2020, “Table 2. Civilian Workers, by occupational and industry group.” The rates are packages available to those employed by private industry.

<sup>b</sup> This is a one-time activity and there are no new sources anticipated to become subject to the standard during the compliance period.

<sup>c</sup> We have assumed that there are approximately 9 existing sources that are subject to the standard, with no new sources anticipated during the compliance period.

<sup>d</sup> We have estimated 18 control devices requiring Method 22 testing and visual emission inspection at the 9 e testing, it is assumed that each of the 9 existing sources has one building per source and that all buildings will

<sup>e</sup> One-time activity. Assume the facilities hire a contractor.

<sup>f</sup> The 9 existing plants would be required to submit an Annual Compliance Certification each year.

<sup>g</sup> Assumes that 2 facilities per year would have to submit a report of exceedance.

<sup>h</sup> Recordkeeping requirements cover all existing plants.

<sup>i</sup> Transmittals would include Annual Compliance Certifications for 9 plants.

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

**Area Sources (40 CFR Part 63, Subpart YYYYYY) (Renewal)**

(C) Person-hours per respondent (A x B)	(D) Respondents per year <sup>a</sup>	(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
40	0	0	0	0	\$0
4	9	36	1.8	3.6	\$4,856.60
4	18	72	3.6	7.2	\$9,713.20
2	1	2	0.1	0.2	\$269.81
5.2	18	93.6	4.68	9.36	\$12,627.15
4	9	36	1.8	3.6	\$4,856.60
2	0	0	0	0	\$0
4	0	0	0	0	\$0
4	9	36	1.8	3.6	\$4,856.60
2	2	4	0.2	0.4	\$539.62
			<b>322</b>		<b>\$37,720</b>
3.6	9	32.4	1.62	3.24	\$4,370.94
0.3	9	2.7	0.135	0.27	\$364.24
			<b>40</b>		<b>\$4,735</b>
			<b>362</b>		<b>\$42,500</b>
					<b>\$0</b>
					<b>\$42,500</b>

Technical, and \$60.23 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit

for this ICR renewal period.

new facilities per year. We assume that each respondent will have to familiarize with the regulatory requirements

xisting sources. It is also assumed that one of these control devices will require a re-test. On building-wide  
l require a re-test.

Labor Rates	
Management	\$148.45
Technical	\$121.46
Clerical	\$60.23

Previous ICR:  
391 hr  
\$41,100

33 hr/response

**Table 2: Annual Agency Burden and Cost -NESHAP for Ferroalloys Production Area Sources (Renewal)**

Activity	(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
Report Review:				
Initial Notification of applicability <sup>b</sup>	1	1	1	0
Notification of Compliance Status <sup>c</sup>	2	1	2	0
Annual Compliance Certification <sup>d</sup>	2	1	2	9
Annual Report of Deviations <sup>e</sup>	2	1	2	2
<b>TOTAL (rounded) <sup>f</sup></b>				

**Assumptions:**

<sup>a</sup> This ICR uses the following labor rates: \$68.37 for managerial, \$50.72 for technical, and \$27.46 for clerical labor. The (OPM), 2020 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for employees.

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

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

<sup>d</sup> All 10 plants will submit an annual compliance certification each year.

<sup>e</sup> Assumes that 2 facilities per year would have to submit an exceedance report per year.

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

**(40 CFR Part 63, Subpart YYYYYY)**

<b>(E) Technical person-hours (C x D)</b>	<b>(F) Managerial person-hours (E x 0.05)</b>	<b>(G) Clerical person-hours (E x 0.10)</b>	<b>(H) Cost, \$<sup>a</sup></b>
0	0	0	\$0
0	0	0	\$0
18	1	1.8	\$1,023.92
4	0.2	0.4	\$227.54
<b>25</b>			<b>\$1,250</b>

Labor Rates	
Management	\$68.37
Technical	\$50.72
Clerical	\$27.46

se rates are from the Office of Personnel Management  
count for the benefit packages available to government

iod.  
liance period.

<b>Number of Respondents</b>			
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports
Year	(A)	(B)	(C)
	Number of New Respondents <sup>a</sup>	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports
1	0	9	0
2	0	9	0
3	0	9	0
<b>Average</b>	<b>0</b>	<b>9</b>	<b>0</b>

<sup>a</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

### **(ii) Estimating Capital/Startup and Operation and Maintenance Co**

The only costs to the regulated industry resulting from information collection activities subject standards are labor costs. There are no capital/startup or operation and maintena

<b>Total Annual Responses</b>			
(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
One-time initial notification	0	1	0
One-time notifications of compliance status	0	1	0
Annual compliance certifications	9	1	0
Annual reports of exceedances	2	1	0
<b>TOTAL</b>			

(D)	(E)
Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
0	9
0	9
0	9
<b>0</b>	<b>9</b>

**sts**

required by the  
nce costs.

(E)
Total Annual Responses $E=(B \times C)+D$
0
0
9
2
<b>11</b>