

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ)  
(Final Amendments)  
June 2020**

**Part A of the Supporting Statement**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Final Amendments), EPA ICR Number 2267.06, OMB Control Number 2060-0605.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) were proposed on September 17, 2007, and promulgated January 2, 2008 (73 FR 252). Amendments to the NESHAP were proposed on October 9, 2019 as a result of the technology review required under the Clean Air Act (CAA) (as discussed further below). The NESHAP applies to both new and existing iron and steel foundries that are area sources of hazardous air pollutants (HAP) emissions. There are different requirements for area source foundries based on size. Existing foundries with an annual metal melt production greater than 20,000 tons and new foundries with an annual melt capacity of 10,000 tons are classified as large foundries. Existing foundries with an annual metal melt production of 20,000 tons or less and new foundries with an annual melt capacity of 10,000 tons or less are classified as small foundries. Research and development facilities are not covered by the rule. New facilities include those that commenced construction, modification or reconstruction after the original date of proposal (September 17,2007). This information is being collected to assure compliance with 40 CFR Part 63, Subpart ZZZZZ.

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.

The final amendments to the NESHAP for Iron and Steel Foundries Area Sources eliminate the startup, shutdown, and malfunction (SSM) exemption; remove the SSM plan requirement; add electronic submittal of notifications, semiannual reports, and performance test reports; and make technical and editorial changes. The remaining portions of the NESHAP remain unchanged.

There are approximately 390 iron and steel foundry area source facilities subject to the standard. The affected facility for the NESHAP for Iron and Steel Foundries Area Sources is each iron and steel foundry. As such, there is only one respondent per plant site (i.e., the owner/operator of the plant site). Over the next three years, approximately 390 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. This estimate consists of 315 small foundries and 75 large foundries.

All of the iron and steel foundries in the United States are owned and operated by the iron and steel industry (the “Affected Public”) and are all privately-owned, for-profit businesses. None of the facilities in the United States are owned by either state, local, tribal or the Federal government. The burden to the Affected Public may be found below in the following three tables: 1) Table 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Final Amendments); 2) Table 1b: Annual Respondent Burden and Cost for Large Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Final Amendments); and 3) Table 1c: Summary of Annual Respondent Burden and Cost for All Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR 63, Subpart ZZZZZ) (Final Amendments). The Federal Government’s burden is attributed to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Final Amendments).

The office of Management and Budget (OMB) approved the currently active Information Collection Request (ICR) without any “Terms of Clearance.”

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

Section 112(d)(5) of the Clean Air Act (CAA) directs the EPA to develop generally available control technology (GACT) standards to control HAP emissions from area sources. The term "area source" means any stationary source of HAP that is not a major source. A major source is a facility that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any HAP or 25 tons per year or more of any combination of HAP. In the Administrator's judgment, HAP emissions from Iron Foundries and Steel Foundries area source categories cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP for the Iron and Steel Foundries Area Sources were promulgated at 40 CFR Part 63, Subpart ZZZZZ in 2008.

Section 112(d)(6) of the CAA requires the EPA to review the technology-based standards and revise them “as necessary (taking into account developments in practices, processes, and control technologies)” no less frequently than every 8 years. The final amendments to the NESHAP for Iron and Steel Foundries Area Sources is a result of this requirement.

Certain records and reports are necessary for the Administrator to confirm the compliance status of sources subject to NESHAP, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the CAA (42 U.S.C. 7414) and set out in the 40 CFR Part 63, NESHAP General Provisions (40 CFR Part 63, Subpart A). CAA 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.

## **2(b) Practical Utility/Users of the Data**

The control of emissions of HAP from iron and steel foundry facilities requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of HAP from these sources are the result of operation of the affected sources. The standards are achieved by the reduction of pollutant emissions using process changes and control technology.

The notifications required in the standards are used to inform the Agency or 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 the standards are being met.

Performance tests are required in order to determine an affected facility’s initial and ongoing capability to comply with the emission standards. During the performance test, a record of the operating parameters under which compliance was achieved may be recorded and used to determine ongoing compliance. Continuous monitoring systems (either continuous emission monitors or continuous parameter monitors) are used to ensure compliance with the standards at all times. 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.

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate their control equipment and achieve continuous compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the CAA. The information collected from recordkeeping and reporting requirements is also used for targeting inspections and is of sufficient quality to be used as evidence in court.

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

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

#### **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**

This section is not applicable because this is a rule-related ICR. Nevertheless, the preamble to the proposed amendments (84 FR 54394) provided public notice of this ICR. No public comments were received related to the burden estimates in the ICR for the proposed amendments. Furthermore, the final amendments include no significant revisions to the proposed amendments as a result of public comments. As such, this ICR for the final amendments contain the same burden estimates as provided in the ICR for the proposed amendments.

#### **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.

Stakeholder outreach occurred with industry groups, including the American Foundry

Society and Steel Founders' Society of America, and member companies of these organizations. Further stakeholder and public input occurred through public comment following publication of the proposed amendments to 40 CFR Part 63, Subpart ZZZZZ in the *Federal Register* and follow-up meetings with interested stakeholders.

### **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 and the final amendments 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 and the final amendments 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 the standards. EPA believes that the 5-year records retention requirement is consistent with the Part 70 permit program and the 5-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. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to either the destruction or nonexistence of essential records in the absence of the 5-year maintenance requirement.

### **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**

None of the reporting or recordkeeping requirements in these standards, including the final amendments, contain sensitive questions.

#### 4. The Respondents and the Information Requested

##### 4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements in the NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) are iron and steel foundries. The United States Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) codes for respondents affected by the standard are listed in the following table:

<b>Standard (40 CFR Part 63, Subpart ZZZZZ)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Iron Foundries	3321, 3322	331511
Steel Investment Foundries	3324	331512
Steel Foundries (except Investment)	3325	331513

##### 4(b) Information Requested

###### (i) Data Items

All data in this ICR that are recorded and/or reported are required by the NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) or would be required under the final RTR amendments. The NESHAP for Iron and Steel Foundries Area Sources references 40 CFR Part 63, Subpart A, for several general reporting and recordkeeping requirements that apply for all NESHAP.

A source must make the following notifications and reports:

<b>Requirement</b>	<b>Regulation Reference (40 CFR Part 63)</b>
<b>Performance Testing</b>	
Initial performance test (large foundries only)	§63.10898(a)
Subsequent performance tests (large foundries only)	§63.10898(b), (i)
<b>Notifications</b>	
Notification of applicability	§§63.9(b)(2), 63.10890(b), 63.10899(d)
Notification of compliance status	§§63.9(h)(1), 63.10890(c), 63.10900
Notification of initial classification or any reclassification	§§63.10890(g), 63.10899(d)
Notification of compliance extension	§63.9(c)

<b>Requirement</b>	<b>Regulation Reference (40 CFR Part 63)</b>
Notification construction/reconstruction	§63.9(b)(5)
Notification of startup	§63.9(b)(4)
Notification of performance test (large foundries only)	§§63.9(e)
Notification of performance evaluation	§63.9(g)
Notification to use a previous performance test (large foundries only)	§63.10898(a)(2)
Notification of request to conduct a performance test to revise the operating limit	§63.10898(l)(1)
<b>Reports</b>	
Semiannual compliance report	§§63.8(c)(7)-(8), 63.10880(f), 63.10899(c)
Operation and maintenance plan (large foundries only)	§63.10896(a)
Site-specific monitoring plan for mercury switch removal, if elected	§63.10885(b)(1)
Site-specific test plan when multiple sources are controlled by a single device (large foundries only)	§§63.7(c)(2)-(3), 63.10898(g)
Site-specific CMS performance evaluation test plan	§§63.8(d)(2), 63.10899(b) (14)
Performance test results (large foundries only)	§63.10899(e)
CMS performance evaluation test results (large foundries only)	§63.10899(f)
<b>Recordkeeping</b>	
Material specifications – written materials specifications, records that demonstrate compliance with requirements for restricted metallic scrap, general scrap, mercury, and scrap that does not contain motor vehicle scrap.	§§63.10890(e)(2), 63.10899(b)(1),
Mercury – records of number of mercury switches removed or weight of mercury recovered, estimated number of vehicles processed, estimate the percent of mercury switches recovered; records identifying each scrap provider and documenting the scrap provider's participation in an approved mercury switch removal program	§§63.10890(e)(3)-(4), 63.10899(b)(2)-(3),
Non-methanol binder chemical formulations - Material Safety Data Sheet, certified product data sheet, or a manufacturer's hazardous air pollutant data sheet.	§§63.10890(e)(5), 63.10899(b)(4),

<b>Requirement</b>	<b>Regulation Reference (40 CFR Part 63)</b>
Annual quantity and composition of each HAP-containing chemical binder or coating material - copies of purchasing records, Material Safety Data Sheets, or other documentation that provide information on the binder or coating materials used	§§63.10890(e)(6), 63.10899(b)(5),
Metal melt production	§§63.10890(e)(7), 63.10899(b)(6),
Operation and maintenance plan (large foundries only)	§63.10899(b)(7)
If applicable, emissions averaging records (large foundries only)	§63.10899(b)(8)
Bag leak detection system (large foundries only)	§63.10899(b)(9)
Capture system inspections (large foundries only)	§63.10899(b)(10)
CPMS specifications (large foundries only)	§63.10899(b)(11)
Corrective action (large foundries only)	§63.10899(b)(12)
PM control device log of inspections/maintenance (large foundries only)	§§63.10897, 63.10899(b)(13)
Site-specific performance evaluation test plan (large foundries only)	§63.10899(b)(14)
Failures to meet an emissions limitation and corrective actions taken (large foundries only)	§63.10899(b)(15)
Records retention policy (five years, but only most recent two years must be maintained onsite)	§§63.10(b)(1), 63.10890(d), 63.10899(a)

### Electronic Reporting

Currently, sources are using monitoring equipment that provides automated parameter data (e.g., continuous opacity or control device parameter monitoring). Although personnel at the facilities still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. Modern iron and steel foundries employ distributive controls on their manufacturing process and have integrated many of the compliance recordkeeping and reporting requirements into their systems. In addition, regulatory agencies are setting up electronic reporting systems to allow sources to report electronically, which is reducing the reporting burden. As part of the final amendments to the NESHAP, respondents would be required to use the EPA's Electronic Reporting Tool (ERT) to submit performance test reports for test methods supported by the ERT.<sup>1</sup> Respondents would also be required to submit notifications and semiannual reports through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI).

<sup>1</sup> As of 2019, Methods 1, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 5, 17, are the test methods referenced in subpart RRRRR that are included in the ERT. Method 5D for Particulate Matter measurement from positive pressure fabric filter are not yet supported by the ERT. [https://www3.epa.gov/ttn/chief/ert/ert\\_info.pdf](https://www3.epa.gov/ttn/chief/ert/ert_info.pdf)



**(ii) Respondent Activities**

<b>Respondent Activities</b>
Review the regulatory requirements.
Perform initial and ongoing performance tests referenced Methods in Appendix A, part 60, (i.e., Methods 1, 2, 3, 4, and 5 or 29 for stack PM/metal HAP testing; Method 9 or 22 for opacity) (large foundries only).
Install, operate and maintain appropriate CPMS for control devices used to comply with the standard's PM or metal HAP emissions limits at a new iron and steel foundry (new affected sources, large foundries only).
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 the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of 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.
Transmit, or otherwise disclose the information.

**5. The Information Collected: Agency Activities, Collection Methodology, and Information Management****5(a) Agency Activities**

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

<b>Agency Activities</b>
Observe initial and ongoing performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.

<b>Agency Activities</b>
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 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 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 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. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. 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 500 employees. Approximately 301 of the 390 iron and steel foundries are small entities. Approximately 45 percent (34 of 75) of the large iron and steel foundries (annual metal melt production greater than 20,000 tons) are owned by small entities while 85 percent (267 of 315) of the small iron and steel foundries are owned by small entities. The final rule includes a specific compliance option for small foundries that provides a maximum degree of operational flexibility, and the ICR requirements are the minimum necessary to demonstrate compliance.

### 5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in: Table 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Final Amendments); Table 1b: Annual Respondent Burden and Cost for Large Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Final Amendments); and Table 1c: Summary of Annual Respondent Burden and Cost for All Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR 63, Subpart ZZZZZ) (Final Amendments).

## 6. Estimating the Burden and Cost of the Collection

Tables 1a-1c document 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 not conduct or 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 14,400 hours (Total Labor Hours from Table 1c below). These hours are based on Agency studies and background documents from the development of the regulation and amendments, 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:

<b>Industry Worker Category <sup>a</sup></b>	<b>Labor Rates, \$/hr <sup>a</sup></b>	<b>110% Overhead</b>	<b>Total, \$/hr</b>
Managerial (11-0000)	\$58.91	\$64.80	\$123.71
Technical (17-2081)	\$38.73	\$42.60	\$81.33
Clerical (43-0000)	\$20.38	\$22.42	\$42.80

<sup>a</sup> Rates are mean hourly rates for May 2018 and are specific for foundry industry segment NAICS 331500 as provided at [https://www.bls.gov/oes/current/naics4\\_331500.htm](https://www.bls.gov/oes/current/naics4_331500.htm). Numbers in parenthesis are the specific BLS occupation codes used to estimate the hourly rates.

Labor rates and associated costs are based on the Bureau of Labor Statistics (BLS) data. Technical, management, and clerical average hourly rates for private industry workers were taken from the May 2018 National Industry-Specific Occupational Employment and Wage Estimates: NAICS 331500 (Foundries). These BLS rates represent base salaries and do not include the cost of fringe benefits and other overhead costs. 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 these 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. EPA's overall compliance and enforcement program includes activities such 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 \$54,100. This cost is based on the average hourly labor rate as follows:

<b>Agency Worker Categories<sup>a</sup></b>	<b>Labor Rates, \$/hr<sup>a</sup></b>	<b>60% Overhead</b>	<b>Total, \$/hr</b>
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

<sup>a</sup> [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS_h.pdf)

These rates are from the Office of Personnel Management (OPM), 2019 General Schedule (incorporating the 1.4% general schedule increase; effective January 2019), which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Final Amendments).

### 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 390 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 390 per year. A total of 315 of the 390 facilities have an annual metal melt production of 20,000 tons or less and are classified as small foundries. The remaining 75 facilities have an annual metal melt production greater than 20,000 tons and are classified as large foundries.

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 <sup>1</sup>	(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	390	0	0	390
2	0	390	0	0	390
3	0	390	0	0	390
Average	0	390			390

<sup>1</sup> 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 3-year period of this ICR is 390.

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
Initial notifications	0	0	0	0
Notification of Foundry Reclassification	0	0	0	0
Notification of Performance Test for PM (large foundries)	75	0.2	0	15

<b>Total Annual Responses</b>				
Report of performance test (through CEDRI using ERT)	75	0.2	0	15
Semiannual compliance reports (all foundries)	390	2	0	780
			Total	810

The number of Total Annual Responses is 810.

The total annual labor costs are \$1,150,000 (rounded). Details regarding these estimates may be found below in Tables 1a-1c: Annual Respondent Burden and Cost – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Final Amendments).

### **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 1a-1c and 2, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 14,400. Details regarding these estimates may be found below in Tables 1a-1c. Annual Respondent Burden and Cost – Annual Respondent Burden and Cost – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Final Amendments).

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 18 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 1,121 labor hours at a cost of \$54,100; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Final Amendments).

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**

This ICR is prepared for final amendments to the NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ). These final amendments: (1) adjust references to the Part 63 General Provisions (40 CFR, Part 63, Subpart A) and revise provisions in the NESHAP (40 CFR Part 63, Subpart ZZZZZ) to remove the SSM exemption and SSM plan requirement; (2) add electronic submittal of notifications, semiannual reports, and performance test reports; and (3) make technical and editorial changes. Where applicable, adjustments for these final amendments are reflected in Tables 1a-1c and 2 of this ICR.

Revisions include revising costs per labor hour to update these values and to use labor rates specific to foundry workers. Additional burden was added to review the amendments, review new electronic reporting forms, and adjust recordkeeping processes to ensure data needed to complete the reporting forms are collected in the proper format. Many of these burden items are one-time requirements that would apply only during the 3-year period of this ICR. Burden estimates were revised to account for reporting the results of the ongoing performance tests through the ERT. The per event burden estimates for performing ongoing performance tests and ongoing opacity observations were increased to be more reflective of the effort required to fulfill these obligations. Furthermore, the burden for conducting the ongoing opacity observations were removed from the burden estimate for small foundries because this requirement only applies to large foundries. Burden estimates were also revised to remove entries for developing SSM plans and submitting periodic SSM reports for large foundries because these are no longer required under the final amendments.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 18 hours per response. “Burden” means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information 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.

**Part B of the Supporting Statement**

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



**Table 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Final Amendments)**

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 <sup>a</sup>	(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 <sup>b</sup>
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 <sup>a</sup>	0.5	1	0.5	315	158	7.9	15.8	\$14,458
B. Required activities								
Repeat performance tests for opacity	N/A							
Scrap specifications <sup>c</sup>	4	1	4	0	0	0	0	\$0
Monthly emission averaging calculation	N/A							
No methanol binder formulation <sup>d</sup>	0	0	0	0	0	0	0	\$0
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report								
Initial notification of applicability <sup>g</sup>	2	1	2	0	0	0	0	\$0
Notification of compliance status <sup>g</sup>	4	1	4	0	0	0	0	\$0
Notification of construction/reconstruction <sup>g</sup>	N/A							
Notification of anticipated startup <sup>g</sup>	N/A							
Notification of actual startup <sup>g</sup>	N/A							
Notification of foundry reclassification <sup>f</sup>	1	0	0	0	0	0	0	\$0
Request for compliance extension <sup>g</sup>	N/A							
Notification of performance test <sup>e</sup>	N/A							
Site specific test plan <sup>g</sup>	N/A							

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 <sup>a</sup>	(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 <sup>b</sup>
Notification of performance evaluation <sup>g</sup>	N/A							
Quality assurance plan for CEMS/COMS <sup>g</sup>	N/A							
NESHAP waiver request <sup>g</sup>	N/A							
Startup, shutdown, and malfunction plan/reports <sup>h</sup>	N/A							
Report of performance test (through CEDRI using ERT) <sup>c</sup>	N/A							
Semiannual compliance reports	4	2	8	315	2520	126	252	\$231,325
<b>Subtotal for Reporting Requirements</b>						<b>3,079</b>		<b>\$245,782</b>
5. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	See 4A							
B. Plan activities <sup>f</sup>	2	1	2	105	210	11	21	\$19,277
C. Implement activities <sup>f</sup>	2	1	2	105	210	11	21	\$19,277
D. Develop record system <sup>f</sup>	1	1	1	105	105	5	11	\$9,639
E. Time to enter information <sup>g</sup>	0.1	52	5.2	315	1,638.0	81.90	163.80	\$150,361
F. Time to transmit or disclose information	0.25	2	0.5	315	158	7.88	15.75	\$14,458
G. Time to adjust existing ways <sup>f</sup>	1	1	1	105	105	5	11	\$9,639
F. Time to train personnel <sup>f</sup>	2	1	2	105	210	10.5	21.0	\$19,277
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>3,031</b>		<b>\$241,927</b>
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>h</sup></b>						<b>6,110</b>		<b>\$488,000</b>
TOTAL CAPITAL AND O&M COST (rounded) <sup>h</sup>								\$0
<b>GRAND TOTAL (rounded) <sup>h</sup></b>						<b>6,110</b>		<b>\$488,000</b>

**Assumptions:**

<sup>a</sup> This table is specific to area source foundries classified as small iron and steel foundries. A total of 315 of the 390 area source foundries are small foundries and 75 are large foundries. No new area source foundries are projected during the 3-year term of this ICR. We assume all respondents will have to spend time familiarizing themselves with regulatory requirements each year.

<b>Burden item</b>	<b>(A) Person hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>	<b>(C) Person hours per respondent per year (C=AxB)</b>	<b>(D) Respondents per year <sup>a</sup></b>	<b>(E) Technical person-hours per year (E=CxD)</b>	<b>(F) Management person hours per year (Ex0.05)</b>	<b>(G) Clerical person hours per year (Ex0.1)</b>	<b>(H) Total Cost per year <sup>b</sup></b>
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<sup>b</sup> This ICR uses the following labor rates from the United States Department of Labor, Bureau of Labor Statistics, May 2018, mean labor rates for Foundries (NAICS 331500) for Management Occupations (11-0000), Environmental Engineer (17-2081) and Office and Administrative Support (43-0000) . The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry. Fully burdened hourly rates are: \$123.71 for management; \$81.33 for technical; and \$42.80 for clerical.

<sup>c</sup> One-time only costs

<sup>d</sup> We have assumed that no burden would be incurred for this requirement because all small area source foundries are already meeting the no methanol requirement.

<sup>e</sup> We have assumed that no small foundries will be reclassified as large foundries.

<sup>f</sup> We have assumed that all small foundries would review record keeping system, adjust methods and train employees during the first year of the rule amendments. Subsequent years, these activities would not be needed. Therefore, the average number of respondents per year is  $(315+0+0)/3 = 105$ .

<sup>g</sup> We have assumed that small foundries must record information to demonstrate compliance with pollution prevention management practices for metallic scrap and binder formulations.

<sup>h</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Small foundries are not assumed to incur any capital or O&M costs.

**Table 1b: Annual Respondent Burden and Cost for Large Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZ) (Final Amendments)**

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 <sup>a</sup>	(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 <sup>b</sup>
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 <sup>a</sup>	1	1	1	75	75	3.8	7.5	\$6,885
B. Required activities								
On-going Performance Test for PM <sup>c</sup>	70	0.2	14	75	1050.0	52.50	105.00	\$96,385
On-going Performance Test for Opacity <sup>d</sup>	3	2	6	75	450.0	22.50	45.00	\$41,308
Scrap material specifications <sup>e</sup>	4	1	4	0	0	0	0	\$0
Prepare operation & maintenance plan <sup>e</sup>	8	1	8	0	0	0	0	\$0
No methanol binder formulation <sup>e</sup>	4	1	4	0	0	0	0	\$0
Initial performance tests <sup>e</sup>	70	0	0	0	0	0	0	\$0
Initial and periodic inspections of PM control devices, monthly inspection of capture systems <sup>f</sup>	2	12	24	75	1800	90	180	\$165,232
Monthly emissions averaging calculations <sup>g</sup>	0.25	12	3	37.5	112.5	5.625	11.25	\$10,327
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Initial notification of applicability <sup>e</sup>	4	1	4	0	0	0	0	\$0
Notification of compliance status <sup>e</sup>	8	1	8	0	0	0	0	\$0

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 <sup>a</sup>	(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 <sup>b</sup>
Notification of construction/reconstruction <sup>e</sup>	N/A							
Notification of actual startup <sup>e</sup>	N/A							
Notification of foundry reclassification <sup>h</sup>	1	0	0	0	0	0	0	\$0
Request for compliance extension <sup>c</sup>	N/A							
Notification of repeat PM performance test <sup>c</sup>	1	0.2	0.2	75	15.0	0.75	1.50	\$1,377
Site specific test plan <sup>e</sup>	0	0	0	0	0	0	0	\$0
Notification of performance evaluation <sup>e</sup>	N/A							
Quality assurance plan for CEMS/COMS <sup>e</sup>	N/A							
NESHAP waiver request <sup>e</sup>	N/A							
Startup, shutdown, and malfunction plan/reports	N/A							
Report of performance test (through CEDRI using ERT) <sup>c</sup>	8	0.2	1.6	75	120.0	6.00	12.00	\$11,015
Semiannual compliance reports <sup>i</sup>	8	2	16	75	1200	60.0	120.0	\$110,155
<b>Subtotal for Reporting Requirements</b>					<b>5,546</b>			<b>\$442,684</b>
5. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	See 4A							
B. Plan activities <sup>j</sup>	4	1	4	25	100	5	10	\$9,180
C. Implement activities <sup>j</sup>	4	1	4	25	100	5	10	\$9,180
D. Develop record system <sup>j</sup>	2	1	2	25	50	3	5	\$4,590
E. Time to enter information <sup>k</sup>	0.5	52	26	75	1,950	97.5	195.0	\$179,001
F. Time to transmit or disclose information <sup>k</sup>	0.25	2	0.5	75	38	1.9	3.8	\$3,442
G. Time to adjust existing ways <sup>j</sup>	2	1	2	25	50	3	5	\$4,590
F. Time to train personnel <sup>j</sup>	4	1	4	25	100	5.0	10.0	\$9,180

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 <sup>a</sup>	(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 <sup>b</sup>
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						2,746		\$291,902
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>k</sup></b>						8,290		\$662,000
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>k</sup></b>								\$0
<b>GRAND TOTAL (rounded)<sup>k</sup></b>						8,290		\$662,000

#### Assumptions:

- <sup>a</sup> This table is specific to area source foundries classified as large iron and steel foundries. There are an estimated 390 area source foundries, 75 of which are expected to be classified as large foundries. No new area source foundries are projected during the 3-year term of this ICR. We assume all respondents will have to spend time familiarizing themselves with regulatory requirements each year.
- <sup>b</sup> This ICR uses the following labor rates from the United States Department of Labor, Bureau of Labor Statistics, May 2018, mean labor rates for Foundries (NAICS 331500) for Management Occupations (11-0000), Environmental Engineer (17-2081) and Office and Administrative Support (43-0000) . The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry. Fully burdened hourly rates are: \$123.71 for management; \$81.33 for technical; and \$42.80 for clerical.
- <sup>c</sup> We have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal melting 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 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. A notification is required.
- <sup>d</sup> We have assumed that all foundries would need to conduct performance tests to demonstrate compliance with the opacity limit in §63.10895(e) at least every 6 months and will not implement a process change likely to increase fugitive emissions over the 3 year 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 can be used per foundry. No separate notification required.
- <sup>e</sup> One-time only costs
- <sup>f</sup> We have assumed that all large foundries must conduct inspection of control device and capture system.
- <sup>g</sup> We assumed half of the large area source foundries (75/2 = 37.5) would use the emissions averaging provisions.
- <sup>h</sup> We have assumed that no foundries will be reclassified as small foundries.
- <sup>i</sup> We have assumed all large foundries will have to submit semi-annual compliance reports.
- <sup>j</sup> We have assumed that all large foundries would review record keeping system, adjust methods and train employees during the first year of the rule amendments. Subsequent years, these activities would not be needed. Therefore, the average number of respondents per year is (75+0+0)/3 = 25.
- <sup>k</sup> We have assumed that large foundries must record information to demonstrate compliance with pollution prevention management practices for metallic scrap and binder formulations and information to demonstrate compliance with monitoring; inspection; operation and maintenance; startups, shutdowns, and malfunctions; and other requirements of the General Provisions (40 CFR part 63, subpart A). In addition, record to record information to demonstrate compliance with the PM and opacity standards.
- <sup>l</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Large foundries are not assumed to incur any capital or O&M costs.

**Table 1c: Summary of Annual Respondent Burden and Cost for All Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Final Amendments)**

<b>Category</b>	<b>Reporting Hours</b>	<b>Recordkeeping Hours</b>	<b>Total Labor Hours</b>	<b>Labor Cost</b>	<b>Number of Responses</b>
Small Foundry	3,079	3,031	6,110	\$488,000	630
Large Foundry	5,546	2,746	8,290	\$662,000	180
<b>Total</b>	<b>8,625</b>	<b>5,776</b>	<b>14,400</b>	<b>\$1,150,000</b>	<b>810</b>

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Final Amendments)**

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 <sup>a</sup>	(E) Technical person- hours per year (CxD)	(F) Management person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
Report Review:								
Initial notification of applicability <sup>c</sup>	1	1	1	0	0	0	0	0
Notification of compliance status <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of performance test <sup>d</sup>	1	0.2	0.2	75	15.0	0.75	1.50	\$832
Performance test report <sup>d</sup>	2	0.2	0.4	75	30.0	1.50	3.00	\$1,663
Semiannual compliance report – small <sup>a</sup>	1	2	2	315	630	31.5	63.0	\$34,931
Semiannual compliance report – large <sup>a</sup>	2	2	4	75	300	15.0	30.0	\$16,634
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>e</sup></b>					<b>1,121</b>			<b>\$54,100</b>

**Assumptions:**

<sup>a</sup> Taking into account shutdown data for foundries, we have assumed that there are 390 existing iron and steel foundries that are area sources. No new sources are projected 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 submit semiannual compliance reports.

<sup>b</sup> This cost is based on the following 2019 labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$66.62 Managerial rate (GS-13, Step 5), \$49.44 Technical rate (GS-12, Step 1), and \$26.75 Clerical rate (GS-6, Step 3). These rates are calculated from the hourly rates included in the Office of Personnel Management (OPM) 2019 General Schedule which excludes locality rates of pay; the rates have been increased by 60 percent to account for benefit packages available to government employees.

<sup>c</sup> One-time only costs

<sup>d</sup> We have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal melting 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 will not implement a performance test due to change to an operating limit or a process change likely to increase HAP emissions.

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