Table 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foi

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Surveys and Studies	N/A		
3. Acquisition, Installation, and Utilization of Technology and Sy	N/A		
4. Reporting Requirements			
A. Familiarization with Regulatory Requirements ^a	0.5	1	0.5
B. Required activities			
Repeat performance tests for opacity	N/A		
Scrap specifications ^c	4	1	4
Monthly emission averaging calculation	N/A		
No methanol binder formulation ^d	0	0	0
C. Create information	See 4B		
D. Gather existing information	See 4B		
E. Write report	See 4B		
Initial notification of applicability ^c	2	1	2
Notification of compliance status ^c	4	1	4
Notification of construction/reconstruction ^c	N/A		
Notification of actual startup ^c	N/A		
Notification of foundry reclassification ^e	1	0	0
Request for compliance extension ^c	N/A		
Notification of repeat performance test	N/A		
Site specific test plan	N/A		
Notification of performance evaluation	N/A		
Quality assurance plan for CEMS/COMS	N/A		
NESHAP waiver request ^c	N/A		
Startup, shutdown, and malfunction plan/reports	N/A		
Report of performance test (through CEDRI using ERT) ^c	N/A		
Semiannual compliance reports	4	2	8
Subtotal for Reporting Requirements			
5. Recordkeeping Requirements			
A. Familiarization with Regulatory Requirements	See 4A		
B. Plan activities ^f	2	1	2
C. Implement activities ^f	2	1	2
D Develop record system ^f	1	1	1
E. Time to enter information ^g	0.1	52	5.2
F. Time to transmit or disclose information	0.25	2	0.5
G. Time to adjust existing ways ^f	1	1	1
F. Time to train personnel ^f	2	1	2
G. Time for audits	N/A		

Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST (rounded)h		
TOTAL CAPITAL AND O&M COST (rounded)h		
GRAND TOTAL (rounded) ^h		

Assumptions:

- ^a This table is specific to area source foundries classified as small iron and steel foundries. A total of 315 of the 390 area s
- ^b This ICR uses the following labor rates from the United States Department of Labor, Bureau of Labor Statistics, May 20
- ^cOne-time only costs
- ^d We have assumed that no burden would be incurred for this requirement because all small area source foundries are alre
- ^e We have assumed that no small foundries will be reclassified as large foundries.
- ^f We have assumed that all small foundries would review record keeping system, adjust methods and train employees dur
- g We have assumed that small foundries must record information to demonstrate compliance with pollution prevention ma
- ^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Small foundries are not a

81.33 123.71 42.8

	(E)		(C)	
(D) Respondents per year ^a	Technical person- hours per year (E=CxD)	(F) Managem ent person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year
315	158	7.9	15.8	\$14,458
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
245	0500	100	0.50	#DD4 D2=
315	2520	126	252	\$231,325
		3,079		\$245,782
105	210	11	71	¢10.277
105 105	210	11 11	21	\$19,277
105	210 105	5	11	\$19,277 \$9,639
315		81.90	163.80	\$150,361.03
315	1,638.0 158	7.88	15.75	\$150,361.03
105	105	7.88	15.75	\$14,457.79
105	210	10.5	21.0	\$19,277
103	210	10.3	41.0	Φ13,4//

Occupation n Code	Title	Mean Hourly Rate
11-0000	Mgmt Occup	58.91
17-2081	Envir Engr	38.73
43-0000	Office and Adm	20.38

3,031	\$241,927
6,110	\$488,000
	\$0
6,110	\$488,000

source foundries are small foundries and 75 are large foundries. No new area source foundries are projected during the 3-year term of this D18, mean labor rates for Foundries (NAICS 331500) for Management Occupations (11-0000), Environmental Engineer (17-2081) and Office of the Company of t

ady meeting the no methanol requirement.

ing the first year of the rule amendments. Subsequent years, these activities would not be needed. Therefore, the average number of responsement practices for metallic scrap and binder formulations. assumed to incur any capital or O&M costs.

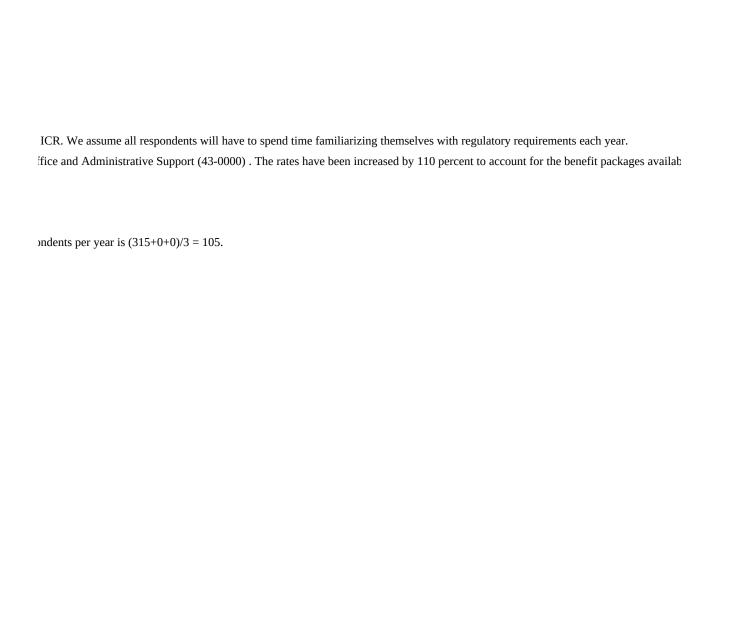
ındries

'current/naics4 331500.htm

Estimated Total Pay with Benefits

> 123.71 81.33

> > 42.8



ole to those employed by private indust	ry. Fully burdened hourly rat	tes are: \$123.71 for managemen	it; \$81.33 for technical; and \$42.80

for clerical.

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) Respondent s per year ^a
1. Applications	N/A			
2. Surveys and Studies	N/A			
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A			
4. Reporting Requirements				
A. Familiarization with Regulatory Requirements ^a	1	1	1	75
B. Required activities				
On-going Performance Test for PM ^c	70	0.2	14	75
On-going Performance Test for Opacity ^d	3	2	6	75
Scrap material specifications ^e	4	1	4	0
Prepare operation & maintenance plane	8	1	8	0
No methanol binder formulation ^e	4	1	4	0
Initial performance tests ^e	70	0	0	0
Initial and periodic inspections of PM control devices, monthly inspection of capture systems ^f	2	12	24	75
Monthly emissions averaging calculations ^g	0.25	12	3	37.5
C. Create information	See 4B			
D. Gather existing information	See 4B			
E. Write report	See 4B			
Initial notification of applicability ^e	4	1	4	0
Notification of compliance status ^e	8	1	8	0
Notification of construction/reconstruction ^e	N/A			
Notification of actual startupe	N/A			
Notification of foundry reclassification ^h	1	0	0	0
Request for compliance extension ^c	N/A			
Notification of repeat PM performance test ^c	1	0.2	0.2	75
Site specific test plan ^e	0	0	0	0
Notification of performance evaluation ^e	N/A			
Quality assurance plan for CEMS/COMS ^e	N/A			
NESHAP waiver request ^e	N/A			
Startup, shutdown, and malfunction plan/reports	N/A			
Report of performance test (through CEDRI using ERT) ^c	8	0.2	1.6	75
Semiannual compliance reports i	8	2	16	75
Subtotal for Reporting Requirements			10	7.5
Recordkeeping Requirements				
A. Familiarization with Regulatory Requirements	See 4A			
B. Plan activities ^j	4	1	4	25
C. Implement activities ^j	4	1	4	25
D Develop record system ^j	2	1	2	25
E. Time to enter information ^k	0.5	52	26	75
E. Time to enter information	0.5] 32	26	75

G. Time to adjust existing ways ^j	2	1	2	25
F. Time to train personnel ^j	4	1	4	25
G. Time for audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded) ¹				
TOTAL CAPITAL AND O&M COST (rounded) ¹				
GRAND TOTAL (rounded) ¹				

Assumptions:

- ^a This table is specific to area source foundries classified as large iron and steel foundries. There are an estimated 390 area source foundr
- b This ICR uses the following labor rates from the United States Department of Labor, Bureau of Labor Statistics, May 2018, mean labor
- ^c We have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal mel
- ^d We have assumed that all foundries would need to conduct performance tests to demonstrate compliance with the opacity limit in §63.1
- ^eOne-time only costs
- ^f We have assumed that all large foundries must conduct inspection of control device and capture system.
- $^{\rm g}$ We assumed half of the large area source foundries (75/2 = 37.5) would use the emissions averaging provisions.
- ^hWe have assumed that no foundries will be reclassified as small foundries.
- ¹We have assumed all large foundries will have to submit semi-annual compliance reports.
- ¹ We have assumed that all large foundries would review record keeping system, adjust methods and train employees during the first year
- ^k We have assumed that large foundries must record information to demonstrate compliance with pollution prevention management prac
- ¹Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Large foundries are not assumed to incu

May 2018 https://www.bls.gov/oes/current/

81.33	123.71	42.8	
(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 ^b
75	3.8	7.5	\$6,885
			·
1050.0	52.50	105.00	\$96,385
450.0	22.50	45.00	\$41,308
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
1800	90	180	\$165,232
112.5	5.625	11.25	\$10,327
0	0	0	\$0
0	0	0	\$0
		•	Ψ.
0	0	0	\$0
15.0	0.75	1.50	\$1,377
0	0	0	\$0
120.0	6.00	12.00	\$11,015
1200	60.0	120.0	\$110,155
	5,546		\$442,684
100	5	10	9180
100	5	10	9180
50	3	5	4590
1,950	97.5	195.0	\$179,001

38

1.9

3.8

\$3,442

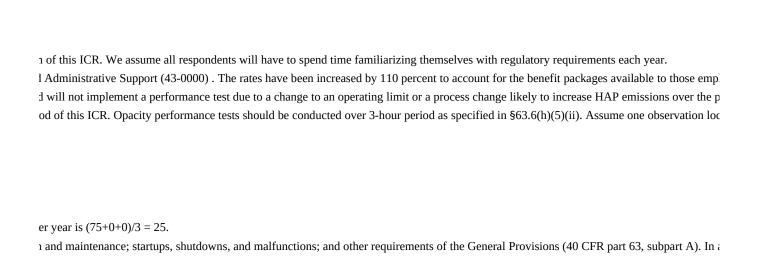
Occupatio n Code	Title	Mean Hourly Rate	Estimated Total Pay with Benefits
11-0000	Mgmt Occup	58.91	123.71
17-2081	Envir Engr	38.73	81.33
43-0000	Office and Ad	20.38	42.8

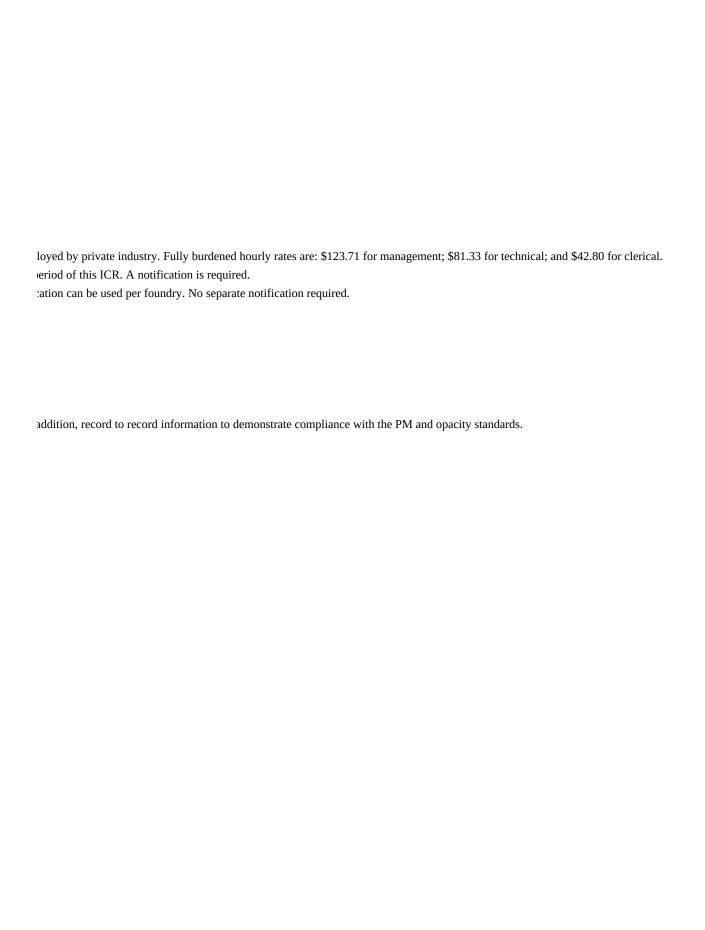
50	3	5	\$4,590
100	5.0	10.0	\$9,180
	2,746		219,162
8,290			662,000
			\$0
	8,290		\$662,000

ies, 75 of which are expected to be classified as large foundries. No new area source foundries are projected during the 3-year tern rates for Foundries (NAICS 331500) for Management Occupations (11-0000), Environmental Engineer (17-2081) and Office and Iting 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 10895(e) at least every 6 months and will not implement a process change likely to increase fugitive emissions over the 3 year peri

r of the rule amendments. Subsequent years, these activities would not be needed. Therefore, the average number of respondents p tices for metallic scrap and binder formulations and information to demonstrate compliance with monitoring; inspection; operation in any capital or O&M costs.

'naics4_331500.htm





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

(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device		Number of New	Capital/Startup	Costs for One	Number of Respondents with O&M ^a
Leak detectors	\$9,000	0	\$0	\$1,470	0
Flow rate monitors	\$7,500	0	\$0	\$2,000	0
Pressure drop	\$7,500	0	\$0	\$2,000	0
Total ^b			\$0		

^a PM control system O&M cost are only applicable to large iron and steel foundries, of which there are 75. Assumes 2

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

!O foundries use a wet scrubber and the remainder use a baghouse.

Table 1c: Annual Respondent Burden and Cost for All Foundries – NESHAP for Iron and Steel Foundry Area So

Category	Reporting Hours	Recordkeeping Hours	Total Labor Hours	Labor Cost
Small Foundry	3,079	3,031	6,110	\$488,000
Large Foundry	5,546	2,746	8,290	\$662,000
Total	8,625	5,776	14,400	\$1,150,000

18 hr per resp

urces (40 CFR Part 63, Subpart ZZZZZ) (Renewal)

Number of Response	
	630
	180
	810

Table 2: Average Annual EPA Burden and Cost - NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (F 2019: \$49.44 \$66.62

					ΨΙΖΙΙΙ	700.0=
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 ^a	(E) Technical person- hours per year (CxD)	(F) Managemen t person- hours per year (Ex0.05)
Report Review:						
Initial notification of applicability ^c	1	1	1	0	0	0
Notification of compliance status ^c	2	1	2	0	0	0
Notification of performance test ^d	1	0.2	0.2	75	15.0	0.75
Performance test report ^d	2	0.2	0.4	75	30.0	1.50
Semiannual compliance report - small ^a	1	2	2	315	630	31.5
Semiannual compliance report - large ^a	2	2	4	75	300	15.0
TOTAL BURDEN AND COST (rounded) ^e						1,121

Assumptions:

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

Agency Worker Rates	r Rates, 🕈	% Overhe	Fotal, \$/hı
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

a https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS h.pdf Effective January 2019

^a Taking into account shutdown data for foundries, we have assumed that there are 390 existing iron and steel foundries that are area s

^b This cost is based on the following 2019 labor rates which incorporates a 1.6 benefits multiplication factor to account for government

^cOne-time only costs

^dWe have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal m

Renewal)

\$26.75

(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
0	(
0	\$0
1.50	\$831.70
3.00	\$1,663.39
63.0	\$34,931.23
30.0	\$16,633.92
	\$54,100

ources. No new sources are projected do toverhead expenses: \$66.62 Managerial

lelting furnace subject to a PM or total \boldsymbol{n}

uring 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 l 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
netal 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

submit semiannual compliance reports.
e hourly rates included in the Office of Personnel Management (OPM) 2019 General Schedule which excludes locality rates of pay; the rates
to change to an operating limit or a process change likely to increase HAP emissions.



(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
Initial Notification	0	0	0
Notification of Compliance Status	0	0	0
Notification of Foundry Reclassification	0	0	0
Notification of Performance Test for PM (large foundries) ^a	75	0.2	0
Report of Performance Test for PM (large foundries) ^a	75	0.2	1
Semiannual compliance reports (small foundries)	315	2	0
Semiannual compliance reports (large foundries)	75	2	0
			Total

(E)

Total	A	Responses
i otai	Annuai	Responses

E=(BxC)+D
0
0
0
15
15
630
150
810

		Current ICR (2267.05)				
	Number of Sources	<u>Distribution</u>	Number of Small Entity	<u>Basis</u>	Number of Sources	
Total	392	1.00	303		390	
small	316	0.81	269	85% of small foundries are small entities	315	
large	76	0.19	34	45% of large foundries are small entities	75	

Revised ICR (2267.06)				
<u>Basis</u>	Number of Small Entity	<u>Basis</u>		
Total count gone down consistently, assumed two more drop. One small and one large				
revised small count	268	85% of small foundries are small entities		
revised large count	34	45% of large foundries are small entities		

Table 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foi

	First Year		
Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Surveys and Studies	N/A		
3. Acquisition, Installation, and Utilization of Technology and Sy	N/A		
4. Reporting Requirements			
A. Familiarization with Regulatory Requirements ^a	0.5	1	0.5
B. Required activities			
Repeat performance tests for opacity	N/A		
Scrap specifications ^c	4	1	4
Monthly emission averaging calculation	N/A		
No methanol binder formulation ^d	0	0	0
C. Create information	See 4B		
D. Gather existing information	See 4B		
E. Write report	See 4B		
Initial notification of applicability ^c	2	1	2
Notification of compliance status ^c	4	1	4
Notification of construction/reconstruction ^c	N/A		
Notification of actual startup ^c	N/A		
Notification of foundry reclassificatione	1	0	0
Request for compliance extension ^c	N/A		
Notification of repeat performance test	N/A		
Site specific test plan	N/A		
Notification of performance evaluation	N/A		
Quality assurance plan for CEMS/COMS	N/A		
NESHAP waiver request ^c	N/A		
Startup, shutdown, and malfunction plan/reports	N/A		
Report of performance test (through CEDRI using ERT) ^c	N/A		
Semiannual compliance reports	4	2	8
Subtotal for Reporting Requirements			
5. Recordkeeping Requirements		•	
A. Familiarization with Regulatory Requirements	See 4A		
B. Plan activities ^f	2	1	2
C. Implement activities ^f	2	1	2
D Develop record system ^f	1	1	1
E. Time to enter information ^g	0.1	52	5.2
F. Time to transmit or disclose information	0.25	2	0.5
G. Time to adjust existing ways ^f	1	1	1
F. Time to train personnel ^f	2	1	2
G. Time for audits	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded)h			
TOTAL CAPITAL AND O&M COST (rounded)h			
ı		I	I

l		
GRAND TOTAL (rounded)h		
Gient D 1017 E (Tounded)		

Assumptions:

- ^a This table is specific to area source foundres classified as small iron and steel foundries. A total of 315 of the 390 area s
- b This ICR uses the following labor rates from the United States Department of Labor, Bureau of Labor Statistics, May 20
- ^cOne-time only costs
- ^d We have assumed that no burden would be incurred for this requirement because all small area source foundries are alre
- $^{\mathrm{e}}$ We have assumed that no small foundries will be reclassified as large foundries.
- ^f We have assumed that all small foundries would review record keeping system, adjust methods and train employees dur
- g We have assumed that small foundries must record information to demonstrate compliance with pollution prevention ma
- ^hTotals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Small foundries are not

81.33 123.71 42.8

(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managem ent person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year
0	0	0.0	0.0	\$0.00
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
			0	ΨΟ
0	0	0	0	\$0
				40
0	0	0	0	\$0
		0		\$0
315	630	32	63	\$57,831
315	630	32	63	\$57,831
315	315	16	32	\$28,916
0	0.0	0.00	0.00	\$0.00
0	0	0.00	0.00	\$0.00
315	315	16	32	\$28,916
315	630	31.5	63.0	\$57,831
		2,898		\$231,325
	2,900			\$231,000
				\$0

Subsequent '	Vears
(A) Person hours per occurrence	(B) No. of occurrences per respondent per year
N/A	
N/A	
N/A	
0.5	1
N/A	
4	1
N/A	
0	0
See 4B	
See 4B	
See 4B	
2	1
4	1
N/A	
N/A	
1	0
N/A	
-1	2
-1	2
C 44	
See 4A	4
2	1
	1
1	1
0.1	52
0.25	2
1	1
2	1
N/A	

2,900 \$231

Combined \$352,000 per foundry \$903

ource foundries are small foundries and 75 are large foundries. No new area source foundries are projected during the 3-year te 118, mean labor rates for Foundries (NAICS 331500) for Management Occupations (11-0000), Environmental Engineer (17-208)

ady meeting the no methanol requirement.

ing the first year of the rule amendments. Subsequent years, these activities would not be needed. Therefore, the average numbe magement practices for metallic scrap and binder formulations.

assumed to incur any capital or O&M costs.

81.33 123.71

42.8

	ı	01.33	123./1	42.0	
(C) Person hours per responden t per year (C=AxB)	(D) Responde nts per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Managem ent person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
0.5			0.0	2.2	#0.00
0.5	0	0	0.0	0.0	\$0.00
4	0	0	0	0	\$0
0	0	0	0	0	\$0
2	0	0	0	0	\$0
4	0	0	0	0	\$0
0	0	0	0	0	\$0
-2	315	-630	-32	-63	-\$57,831
			-725		-\$57,831
2		0	0	0	\$0
2		0	0	0	\$0
1		0	0	0	\$0
5.2		0.0	0.00	0.00	\$0.00
0.5		0	0.00	0.00	\$0.00
1		0	0	0	\$0
2		0	0.0	0.0	\$0
			0	•	\$0
			-720		-\$57,800
					\$0
					ΦU

Occupatio n Code Title

11-0000 Mgmt Occ 17-2081 Envir Engr 43-0000 Office and

-720	-\$57,800
------	-----------

Combined -\$67,400 per foundry -\$173

rm of this ICR. We assume all respondents will have to spend time familiarizing themselves with regulatory requirements eac 1) and Office and Administrative Support (43-0000) . The rates have been increased by 110 percent to account for the benefit

r of respondents per year is (315+0+0)/3 = 105.

CS 331500: Foundries

vw.bls.gov/oes/current/naics4_331500.htm

Mean Hourly Rate	Total Pay with Benefits
58.91	123.71
38.73	81.33
20.38	42.8

h year. packages available to those employed by private industry. Fully burdened hourly rates are: \$123.71 for management; \$81.33 for tech

nical; and \$42.80 for clerical.

First Year

Name Name		First Year			
2. Surveys and Studies 3. Acquisition, Installation, and Utilization of Technology and Systems N/A 4. Reporting Requirements 4. Familiarization with Regulatory Requirements' B. Required activities G. Required activities G. Required activities G. On-going Performance Test for PM 70 0.2 14 0.7 0.9 0.9 0.9 0.9 0.9 0.9 0.0 0.0 0.0 0.0	Burden item	hours per	occurrences per respondent	hours per respondent per year	(D) Respondent s per year ^a
2. Surveys and Studies 3. Acquisition, Installation, and Utilization of Technology and Systems N/A 4. Reporting Requirements 4. Familiarization with Regulatory Requirements' B. Required activities G. Required activities G. Required activities G. On-going Performance Test for PM 70 0.2 14 0.7 0.9 0.9 0.9 0.9 0.9 0.9 0.0 0.0 0.0 0.0	1. Applications	N/A			
3. Acquisition, Installation, and Utilization of Technology and Systems		N/A			
4. Reporting Requirements A. Familiarization with Regulatory Requirements* A. Familiarization with Regulatory Requirements* A. Familiarization with Regulatory Requirements* B. Required activities On-going Performance Test for DMF On-going Performance Test for Opacity* 3 2 6 6 Scrap material specifications* 4 1 1 4 0 Prepare operation & maintenance plant* No methanol binder formulation* 4 1 1 4 0 Initial performance tests * 70 0 0 0 0 Initial and periodic inspections of PM control devices, monthly inspection of capture systems* Monthly emissions averaging calculations contact in the state of capture systems of the state information See 4B	-				
A. Familiarization with Regulatory Requirements' 1	2 2	1,112			
B. Required activities					
On-going Performance Test for PMF	A. Familiarization with Regulatory Requirements ^a	1	1	1	
On-going Performance Test for Opacity 3	B. Required activities				
Scrap material specifications*	On-going Performance Test for PM ^c	70	0.2	14	
Prepare operation & maintenance plans	On-going Performance Test for Opacity ^d	3	2	6	
No methanol binder formulation * 4	Scrap material specifications ^e	4	1	4	0
Initial performance tests 70	Prepare operation & maintenance plan ^e	8	1	8	0
Initial performance tests 70		4	1	4	0
Initial and periodic inspections of PM control devices, monthly inspection of capture systems		70		0	-
C. Create information	Initial and periodic inspections of PM control devices, monthly inspection			24	-
D. Gather existing information See 4B E. Write report See 4B Initial notification of applicability ^a 4 1 4 0 Notification of compliance status ^a 8 1 8 0 Notification of construction/reconstruction ^a N/A Notification of actual startup ^a N/A Notification of foundry reclassification ^b 1 0 0 0 Request for compliance extension ^a N/A	Monthly emissions averaging calculations g	0.25	12	3	
E. Write report Initial notification of applicability* A 1 1 4 0 Notification of compliance status* 8 1 8 0 Notification of construction/reconstruction* N/A Notification of actual startup* Notification of foundry reclassification* Request for compliance extension* Notification of repeat PM performance test * Notification of repeat PM performance test * Notification of performance evaluation* Notification of founds, and an	C. Create information	See 4B			
Initial notification of applicability	D. Gather existing information	See 4B			
Notification of compliance statuse 8 1 8 0 Notification of construction/reconstructione N/A N/A N/A Notification of construction/reconstructione N/A N/A Notification of foundry reclassificatione N/A N/A Notification of foundry reclassificatione 1 0 <td>E. Write report</td> <td>See 4B</td> <td></td> <td></td> <td></td>	E. Write report	See 4B			
Notification of construction/reconstruction* N/A N/A Notification of actual startup* N/A 0 Notification of foundry reclassification* 1 0 0 Request for compliance extension* N/A Notification of repeat PM performance test * 1 0.2 0.2 Site specific test plan * 0 0 0 0 Notification of performance evaluation* N/A Quality assurance plan for CEMS/COMS* N/A NESHAP waiver request* N/A Startup, shutdown, and malfunction plan/reports N/A Report of performance test (through CEDRI using ERT)* 8 0.2 1.6 75 Semiannual compliance reports* 8 2 16 0 Subtotal for Reporting Requirements 5. Recordkeeping Requirements 4 1 4 75 C. Implement activities* 4 1 4 75 <td>Initial notification of applicability^e</td> <td>4</td> <td>1</td> <td>4</td> <td>0</td>	Initial notification of applicability ^e	4	1	4	0
Notification of actual startup*	Notification of compliance status ^e	8	1	8	0
Notification of foundry reclassification ^h	Notification of construction/reconstruction ^e	N/A			
Request for compliance extension ^c N/A	Notification of actual startup ^e	N/A			
Notification of repeat PM performance test c	Notification of foundry reclassification ^h	1	0	0	0
Notification of repeat PM performance test c	Request for compliance extension ^c	N/A			
Site specific test plan ° 0 0 0 0 0 Notification of performance evaluation° N/A Quality assurance plan for CEMS/COMS° N/A NESHAP waiver request° N/A Startup, shutdown, and malfunction plan/reports N/A Report of performance test (through CEDRI using ERT)° 8 0.2 1.6 75 Semiannual compliance reports¹ 8 2 16 0 Subtotal for Reporting Requirements 5. Recordkeeping Requirements A. Familiarization with Regulatory Requirements B. Plan activities¹ 4 1 4 75 C. Implement activities¹ 4 1 4 75 D Develop record system¹ 2 1 2 75 E. Time to enter information k 0.25 2 0.5 C. Time to adjust existing ways¹ 2 1 2 75 F. Time to train personnel¹ 4 1 4 75 G. Time to train personnel¹ 4 1 4 75 G. Time for audits		1	0.2	0.2	
Notification of performance evaluation ^e Quality assurance plan for CEMS/COMS ^e N/A NESHAP waiver request ^e N/A Startup, shutdown, and malfunction plan/reports Report of performance test (through CEDRI using ERT) ^e Semiannual compliance reports [†] 8 0.2 1.6 75 Semiannual compliance reports [†] 8 2 16 0 Subtotal for Reporting Requirements 5. Recordkeeping Requirements A. Familiarization with Regulatory Requirements See 4A B. Plan activities [†] 4 1 4 75 C. Implement activities [†] Develop record system [†] E. Time to enter information ^k F. Time to transmit or disclose information ^k G. Time to adjust existing ways [†] F. Time to train personnel [†] G. Time for audits N/A					0
Quality assurance plan for CEMS/COMS° N/A NESHAP waiver request° Startup, shutdown, and malfunction plan/reports Report of performance test (through CEDRI using ERT) ° Semiannual compliance reports ¹ 8 0.2 1.6 75 Semiannual compliance reports ¹ 8 2 16 0 Subtotal for Reporting Requirements 5. Recordkeeping Requirements A. Familiarization with Regulatory Requirements B. Plan activities ³ 4 1 4 75 C. Implement activities ³ 4 1 4 75 D Develop record system ³ 2 1 2 75 E. Time to enter information ¹ F. Time to transmit or disclose information ¹ G. Time to adjust existing ways¹ F. Time to train personnel ³ F. Time to train personnel ³ F. Time for audits N/A					
NESHAP waiver requeste N/A Startup, shutdown, and malfunction plan/reports Report of performance test (through CEDRI using ERT) 8 Semiannual compliance reports 8 Semiannual compliance reports 8 Semiannual compliance reports 8 Secordkeeping Requirements A. Familiarization with Regulatory Requirements See 4A B. Plan activities 4 A 1 4 75 C. Implement activities 4 Develop record system 4 Develop record system 5 E. Time to enter information 8 F. Time to transmit or disclose information 9 G. Time to adjust existing ways 9 F. Time to train personnel 1 A 75 G. Time for audits	-				
Startup, shutdown, and malfunction plan/reports Report of performance test (through CEDRI using ERT) ° Semiannual compliance reports ¹ Semiannual compliance reports ¹ Subtotal for Reporting Requirements See 4A A. Familiarization with Regulatory Requirements See 4A B. Plan activities ¹ C. Implement activities ¹ D Develop record system ¹ E. Time to enter information k F. Time to transmit or disclose information k G. Time to adjust existing ways ¹ F. Time to train personnel ¹ F. Time to train personnel ¹ G. Time for audits N/A					
Report of performance test (through CEDRI using ERT) c Semiannual compliance reports i 8 0.2 1.6 0 Subtotal for Reporting Requirements 5. Recordkeeping Requirements A. Familiarization with Regulatory Requirements B. Plan activities i 4 1 4 75 C. Implement activities i 4 1 4 75 D Develop record system i 5. Time to enter information k 6. Time to enter information k 7. Time to transmit or disclose information k 7. Time to adjust existing ways i 7. Time to train personnel i 7. Time for audits 8 0.2 1.6 75 8 0.2 16 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	-				
Semiannual compliance reports i 8 2 16 0 Subtotal for Reporting Requirements 5. Recordkeeping Requirements A. Familiarization with Regulatory Requirements B. Plan activities i 4 1 4 75 C. Implement activities i 4 1 4 75 D Develop record system i 2 1 2 75 E. Time to enter information k 0.25 52 26 F. Time to transmit or disclose information k 0.25 2 0.5 G. Time to adjust existing ways i 2 1 2 75 F. Time to train personnel i 4 1 4 75 G. Time for audits		+	0.2	1.6	75
Subtotal for Reporting Requirements See 4A 5. Recordkeeping Requirements See 4A A. Familiarization with Regulatory Requirements 4 1 4 75 B. Plan activities j 4 1 4 75 C. Implement activities j 4 1 4 75 D Develop record system j 2 1 2 75 E. Time to enter information k 0.5 52 26 F. Time to transmit or disclose information k 0.25 2 0.5 G. Time to adjust existing ways j 2 1 2 75 F. Time to train personnel j 4 1 4 75 G. Time for audits N/A N/A					
5. Recordkeeping Requirements A. Familiarization with Regulatory Requirements B. Plan activities J C. Implement activities J D Develop record system J E. Time to enter information K F. Time to transmit or disclose information K G. Time to adjust existing ways J F. Time to train personnel J G. Time for audits See 4A 1		0	2	10	0
B. Plan activities J 4 1 4 75 C. Implement activities J 4 1 4 75 D Develop record system J 2 1 2 75 E. Time to enter information K 0.5 52 26 F. Time to transmit or disclose information K 0.25 2 0.5 G. Time to adjust existing ways J 2 1 2 75 F. Time to train personnel J 4 1 4 75 G. Time for audits N/A N/A		<u> </u>			
B. Plan activities J 4 1 4 75 C. Implement activities J 4 1 4 75 D Develop record system J 2 1 2 75 E. Time to enter information K 0.5 52 26 F. Time to transmit or disclose information K 0.25 2 0.5 G. Time to adjust existing ways J 2 1 2 75 F. Time to train personnel J 4 1 4 75 G. Time for audits N/A N/A	A. Familiarization with Regulatory Requirements	See 4A			
D Develop record system j 2 1 2 75 E. Time to enter information k 0.5 52 26 F. Time to transmit or disclose information k 0.25 2 0.5 G. Time to adjust existing ways j 2 1 2 75 F. Time to train personnel j 4 1 4 75 G. Time for audits N/A		+	1	4	75
D Develop record system j 2 1 2 75 E. Time to enter information k 0.5 52 26 F. Time to transmit or disclose information k 0.25 2 0.5 G. Time to adjust existing ways j 2 1 2 75 F. Time to train personnel j 4 1 4 75 G. Time for audits N/A	C. Implement activities ^j	4	1	4	75
E. Time to enter information k F. Time to transmit or disclose information k G. Time to adjust existing ways j F. Time to train personnel j G. Time to train personnel j G. Time for audits N/A 1 2 75 N/A		2	1	2	75
F. Time to transmit or disclose information k G. Time to adjust existing ways 1 F. Time to train personnel 1 G. Time to train personnel 1 F. Time to train personnel 1 F. Time for audits N/A 1 2 0.5 2 75 F. Time to train personnel 1 A 1 A 75		0.5	52	26	
G. Time to adjust existing ways ^j E. Time to train personnel ^j G. Time to adjust existing ways ^j 4 1 4 75 G. Time for audits N/A					
F. Time to train personnel j 4 1 4 75 G. Time for audits N/A		-			75
G. Time for audits N/A					
		•	<u> </u>	7	, ,
Nummu for RecordReening Regultements	Subtotal for Recordkeeping Requirements	11/1			

TOTAL LABOR BURDEN AND COST (rounded) ¹		
TOTAL CAPITAL AND O&M COST (rounded) ¹		
GRAND TOTAL (rounded) ¹		

Assumptions:

- ^a This table is specific to area source foundries classified as large iron and steel foundries. There are an estimated 390 area source foundr
- ^b This ICR uses the following labor rates from the United States Department of Labor, Bureau of Labor Statistics, May 2018, mean labor
- ^c We have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal mel
- ^d We have assumed that all foundries would need to conduct performance tests to demonstrate compliance with the opacity limit in §63.1
- ^eOne-time only costs
- ^f We have assumed that all large foundries must conduct inspection of control device and capture system.
- g We assumed half of the large area source foundries (75/2 = 37.5) would use the emissions averaging provisions.
- ^hWe have assumed that no foundries will be reclassified as small foundries.
- ${}^{\scriptscriptstyle \mathrm{I}}\mathrm{We}$ have assumed all large foundries will have to submit semi-annual compliance reports.
- ¹ We have assumed that all large foundries would review record keeping system, adjust methods and train employees during the first year
- k We have assumed that large foundries must record information to demonstrate compliance with pollution prevention management prac
- ¹Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Large foundries are not assumed to incu

81.33	123.71	42.8	
(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 ^b
0	0.0	0.0	\$0.00
0	0.0	0.0	\$0.00
0.0	0.00	0.00	\$0.00
0.0	0.00	0.00	\$0.00
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
			<u> </u>
0	0	0	\$0
0	0	0	\$0 \$0
-	0	U	Ф О
0	0	0	\$0
0.0	0.00	0.00	\$0.00
0	0	0	\$0
120.0	6.00	12.00	\$11,015.46
0	0.0	0.0	\$0.00
	138	0.0	\$11,015
			. , , . = e
300	15	30	27539
300	15	30	27539
150	8	15	13769
0	0.0	0.0	\$0.00
0	0.0	0.0	\$0.00
150	8	15	\$13,769
300	15.0	30.0	\$27,538.65
	1,380	<u> </u>	110,155
			,

Subsequent Years

Subsequen	t years		
(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondent s per year ^a
N/A			
N/A			
N/A			
- 11/11			
1	1	1	
70	0.2	14	
3	2	6	
4	1	4	0
8	1	8	0
4	1	4	0
70	0	0	0
2	12	24	
0.25	12	3	
See 4B			
See 4B			
See 4B			
4	1	4	0
8	1	8	0
N/A			
N/A			
1	0	0	0
N/A			
1	0.2	0.2	
0	0	0	0
N/A			
8	0.2	1.6	75
-1.5	2	-3	75
See 4A			
4	1	4	
4	1	4	
2	1	2	
0.5	52	26	
0.25	2	0.5	
2	1	2	
4	1	4	
	1	4	
N/A			
<u> </u>	<u> </u>		l

1,520	121,000
	\$0
1,520	\$121,000

i		
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ı		
ı		

ies, 75 of which are expected to be classified as large foundries. No new area source foundries are projected during the 3-year terr rates for Foundries (NAICS 331500) for Management Occupations (11-0000), Environmental Engineer (17-2081) and Office and Iting 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 10895(e) at least every 6 months and will not implement a process change likely to increase fugitive emissions over the 3 year peri

r of the rule amendments. Subsequent years, these activities would not be needed. Therefore, the average number of respondents prices for metallic scrap and binder formulations and information to demonstrate compliance with monitoring; inspection; operation in any capital or O&M costs.

81.33 123.71 42.8

01.33	123./1	42.0	
(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 ^b
0	0.0	0.0	\$0.00
_	0.0	0.0	ψ0.00
0.0	0.00	0.00	\$0.00
0.0	0.00	0.00	\$0.00
0.0			
	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
<u> </u>			ΨΟ
0.0	0.00	0.00	ΦΩ ΩΩ
0.0	0.00		\$0.00
0	0	0	\$0
120.0	6.00	12.00	\$11,015.46
-225	-11.3	-22.5	-\$20,653.99
	-121	<u> </u>	-\$9,639
			,
0	0	0	0
0	0	0	0
0	0	0	0
0	0.0	0.0	\$0.00
0	0.0	0.0	\$0.00
0	0.0	0.0	\$0.00
0	0.0	0.0	\$0.00
	0.0	0.0	\$0.00
	0		0

Occupatio n Code	Title	Mean Hourly Rate
11-0000	Mgmt Occup	58.91
17-2081	Envir Engr	38.73
43-0000	Office and Admin Sup	20.38

-120	-9,600
	\$0
-120	-\$9,600

n of this ICR. We assume all respondents will have to spend time familiarizing themselves with regulatory requirements each Administrative Support (43-0000). The rates have been increased by 110 percent to account for the benefit packages avail divide will not implement a performance test due to a change to an operating limit or a process change likely to increase HAP end of this ICR. Opacity performance tests should be conducted over 3-hour period as specified in §63.6(h)(5)(ii). Assume o

er year is (75+0+0)/3 = 25.

 ι and maintenance; startups, shutdowns, and malfunctions; and other requirements of the General Provisions (40 CFR part ℓ

rent/naics4_331500.htm

Estimated Total Pay with Benefits

123.71

81.33

42.8

ch year. lable to those employed by private industry. Fully burdened hourly rates are: \$123.71 for management; \$81.33 for technical; an issions over the period of this ICR. A notification is required. ne observation location can be used per foundry. No separate notification required.
33, subpart A). In addition, record to record information to demonstrate compliance with the PM and opacity standards.

d \$42.80 for clerical.