

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(B \times C)+D$
Notification of compliance status	0	1	0	0
Notification/application of construction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test and test plan	0	1	0	0
Report of performance test results ¹	5.6	1	0	5.6
Report of semiannual compliance reports	14	2	0	28
Report of quarterly compliance reports ²	9	4	0	36
Report of startup, shutdown, malfunction ³	1	1	0	1
			Total ⁴	71

¹ There is an average of 5.6 respondents per year (14*0.4) submitting Method 5 performance test reports.

² 40 CFR 63.7341(b) requires quarterly reporting for the COMS systems monitoring opacity of emissions from stacks on the coke oven.

³ Assumes that one respondent per year will have a startup, shutdown and malfunction (SSM) occurrence that is not managed according to the permit.

⁴ Figures may not add exactly due to rounding.

zens at the 9 by-product recovery plants.
ling to the SSM plan

Table 1: Annual Respondent Burden and Cost – NESHAP for Coke Oven Pushing, Quenching, and Battery Stack

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (Cx D)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Acquisition, Installation, and Utilization of Technology and Systems	40	1	40	0	0
4. Reporting Requirements					
A. Familiarize with rule requirement	2	1	2	14	28
B. Required activities ^{c, d}					
Method 5 performance test ^{e, c}	40	1.5	60	5.6	336
Startup, shutdown, malfunction plan	40	1	40	0	0
Operation and maintenance plans for by-product coke oven batteries and capture systems and control devices applied to pushing emissions	40	1	40	0	0
Work practice plan for batteries with horizontal flues (one plant)	40	1	40	1	40
Method 9 daily observations for fugitive pushing emissions ^f	3.1	365	1,147	14	16,060
Weekly sampling for total dissolved solids (TSD) ^g	2.3	52	119.6	14	1,674.4
Monthly inspections and maintenance of affected sources, control devices, and continuous parameter monitoring systems ^e	2	12	24	14	336
C. Create information	See 4B				
D. Gather existing information	See 4B				
E. Write report					
Notification of applicability	2	1	2	0	0
Notification of constr./reconstr.	2	1	2	0	0
Notification of anticipated startup	2	1	2	0	0
Notification of actual startup	2	1	2	0	0
Notification of special compliance Requirements	2	1	2	0	0
Compliance extension request	2	1	2	0	0
Notification of performance test ^c	2	1.5	3	0	0
Site-specific test plan	40	1	40	0	0
Notification of compliance status	8	1	8	0	0
NESHAP waiver application	N/A				
Report of performance test ^h	See 4B				
Semiannual compliance reports ^h	40	2	80	14	1120
Quarterly compliance reports for battery stacks ⁱ	12	4	48	9	432
Emergency startup, shutdown, or malfunction reports ^j	4	1	4	1	4
Subtotal for Reporting Requirements					
5. Recordkeeping Requirements					

A. Familiarize with rule requirement	See 4A				
B. Plan activities	3	1	3	0	0
C. Implement activities	12	1	12	0	0
D. Develop record system	3	1	3	0	0
E. Time to enter information	1	52	52	14	728
F. Time to train personnel	3	1	3	0	0
G. Time to adjust existing ways to comply with previously applicable requirements	3	1	3	0	0
H. Time to transmit or disclose information ^k	0.25	2	0.5	14	7
I. Time for audits	N/A				
Subtotal for Recordkeeping Requirements					
TOTAL LABOR BURDEN AND COST (rounded) ¹					
Capital and O&M Cost (rounded) ¹					
GRAND TOTAL (rounded) ¹					

Assumptions:

^a There is an average of 14 respondents (i.e., 9 coke plants operating 27 by-product batteries and 5 coke plants operating 5 by-product batteries). U.S. Department of Labor, Bureau of Labor Statistics, March 2021, “Table 2. Civilian Workers, by Occupational and Industrial Group”

^c We have assumed that existing respondents have already comply with initial rule requirements and are in full compliance with the initial rule requirements including notifications and performance tests for add-on control devices.

^d Monitoring and recordkeeping of operations for respondents include: monthly inspection of capture and control system practices for batteries with horizontal flues (one plant); and Method 5 testing for particulate matter.

^e The rule requires that every 2.5 years (or 0.4 times per year over the 3 years of the ICR), each control device applied to a battery is tested. EPA has determined that there is an average of 1.5 emission points per respondent that need to be tested. There is an average of 5 emission points per battery.

^f Assumes one hour of observations per day per battery.

^g The measuring of the total dissolved solids (TDS) in the make-up water used for quenching is a requirement. In past a

^h The rules requires the submittal of quarterly compliance reports for all battery stacks. If no deviation occurred and no other sources, semiannual reports are required for any deviation from an emission limitation (including an operating limit), with

ⁱ 40 CFR 63.7341(b) requires quarterly reporting for the COMS monitoring opacity of emissions from the stacks on by-product

^j It assumes that one respondent per year will have a startup, shutdown and malfunction (SSM) occurrence that is not minor

^k It assumes 15 minutes to transmit recorded information

¹Totals have been rounded to 3 significant values. Figures may not add exactly due to rounding.

ks (40 CFR Part 63, Subpart CCCCC) (Renewal)

(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
0	0	\$0
1.4	2.8	\$3,808.80
16.8	33.6	\$45,705.58
0	0	\$0
0	0	\$0
2	4	\$5,441.14
803.0	1,606.0	\$2,184,617.71
83.7	167.4	\$227,766.12
16.8	33.6	\$45,705.58
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
56	112	\$152,351.92
21.6	43.2	\$58,764.31
0.2	0.4	\$544.11
23,035		\$2,724,705

Labor Rates	
Technical	122.20
Management	153.55
Clerical	61.51

Number of Respondents:	14
By-product Batteries	27
Non-recovery Batteries	20
Total batteries	47

0	0	\$0
0	0	\$0
0	0	\$0
36.4	72.8	\$99,028.75
0	0	\$0
0	0	\$0
0.35	0.7	\$952.20
845		\$99,981
23,900		\$2,820,000
		\$125,000
		\$2,950,000

71 responses/yr
339 hr/resp

g 20 non-recovery batteries). We have assumed that there will be no new sources subject to this regulation. y group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110% to nce with periodic requirements including quarterly and semiannual reports. New respondents would have to

ns; daily Method 9 observations; weekly sampling for dissolved solids for quenching operations; work

o pushing emissions must be sampled by Method 5 for particulate matter. From past analysis, we have 5.6 respondents per year (14*0.4) submitting Method 5 performance test reports.

nalysis, we determined there is an average of 2.3 quenching towers per facility.

continuous monitoring systems were out of control, only a summary report is required. For other affected ork practice standard, or O&M requirement.

-product recovery coke ovens, which are present at 9 plants.

managed according to the SSM plan.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Coke Oven Pushing, Que

Burden item	(A) Person hours per occurrence	(B) No. of occurrence s per plant per year	(C) Hours per plant per year (AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (Cx D)
Initial performance test	40	1	40	0	0
Repeat performance test-Retesting preparation	2	1	2	0	0
Repeat performance- Retesting	40	1	40	0	0
Report Review					
Notification of construction/reconstruction	N/A				
Notification of anticipated startup	N/A				
Notification of actual startup	N/A				
Notification of special compliance requirements	N/A				
Notification of initial performance test	2	1	2	0	0
Notification of compliance status ^d	2	1	2	0	0
Review of repeat Method 5 performance test report	8	1	8	5.6	44.8
Review of semi-annual compliance report ^e	8	0.4	3.2	14	44.8
Review of NESHAP waiver application	2	1	2	0	0
Review of quarterly compliance report for battery stacks ^f	1	4	4	9	36
Review of emergency startup, shutdown, and malfunction report ^g	4	1	4	1	4
TOTAL ANNUAL COST ^h					

Assumptions:

^a There is an average of 14 respondents (i.e., 9 coke plants operating 27 by-product batteries and 5 coke plants op to this regulation.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account rate of \$51.23 (GS-12, Step 1, \$32.02 + 60%), and Clerical rate of \$27.73 (GS-6, Step 3, \$17.33 + 60%). These r rates of pay.

^c We have assumed that existing sources have complied with the initial rule requirements. New respondents are startup, shutdown and malfunction (SSM) plans.

^d Every 2.5 years (or about 0.4 times per year, if averaged over the three-year period of ICR), respondents must s

^e Sources are required to submit semiannual compliance reports and startup, shutdown and malfunction (SSM) r

^f 40 CFR 63.7341(b) requires the submittal of quarterly compliance reports for the COMS monitoring opacity on

^g It assumes that one respondent will have a startup, shutdown and malfunction (SSM) occurrence that is not mar

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

Monitoring, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Renewal)

(F) Management 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
0	0	\$0
0	0	\$0
0	0	\$0
2.24	4.48	\$2,573.98
2.24	4.48	\$2,573.98
0	0	\$0
1.8	3.6	\$2,068.38
0.2	0.4	\$229.82
149		\$7,450

Labor Rates	
Technical	51.23
Management	69.04
Clerical	27.73

operating 20 non-recovery batteries). We have assumed that there will be no new sources subject

for government overhead expenses: Managerial rate of \$69.04 (GS-13, Step 5, \$43.15 + 60%), Technical rates are from the Office of Personnel Management (OPM) "2021 General Schedule" which excludes locality

required to conduct performance test for add-on control equipment, submit initial notifications and prepare

sample each emission point using Method 5 for particulate matter and submit a report of results.

reports if there is an occurrence that is not managed according to the SSM plan.

the battery stacks at the 9 coke plants utilizing by-product recovery ovens.

managed according to the SSM plan.