SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Steel Pickling, HCl Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Steel Pickling, HCl Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (Renewal), EPA ICR Number 1821.11, OMB Control Number 2060-0419.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Steel Pickling, HCl Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) were proposed on September 18, 1997; promulgated on June 22, 1999; and amended on both September 19, 2012 and November 19, 2020[1]. This rule applies to all facilities that pickle steel using hydrochloric acid (HCl) or regenerate hydrochloric acid and are either major sources or part of a facility that is a major source. This regulation does not apply to any pickling line that uses an acid other than hydrochloric acid or an acid solution containing either less than 6 percent hydrochloric acid or at a temperature less than 100° F. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart CCC.

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 of these measurements and retain this file for at least five years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. If there is no such delegated authority, the EPA regional office can review them. All other reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the EPA regional offices. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority such as a state agency. The term "Administrator" alone refers to the U.S. EPA

1 The most recent amendments at 85 FR 73854 include notification and recordkeeping requirements that apply to sources choosing to reclassify to area source status and to sources that revert to major source status, including a requirement for electronic notification.

Administrator.

The "Affected Public" are owners or operators of steel pickling, HCl process facilities and HCl regeneration plants. The "burden" to the Affected Public may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Steel Pickling, HCl Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (Renewal). The "burden" to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Steel Pickling, HCl Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (Renewal), There are approximately 100 facilities, which are owned and operated by the steel pickling (95 facilities) and acid regeneration (5 facilities) industries. None of the 100 facilities in the United States are owned by either state, local, tribal entities or by the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

Based on our consultations with industry representatives, there is an average of one affected facilities at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 100 respondents (95 steel pickling and 5 acid regeneration facilities) per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

The Office of Management and Budget (OMB) approved the currently-active ICR without any "Terms of Clearance."

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

> (A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the

> Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HCl emissions from continuous and batch pickling lines and acid regeneration units, and chlorine emissions from acid regeneration units, either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart CCC.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations, which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility’s initial capability to comply with these emission standards. Continuous emission monitors are used to ensure compliance with these same standards at all times. During the performance test a record of the operating parameters, under which compliance was achieved, may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of these regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired and that these standards are being met. The performance test may also be observed.

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 EPA is requiring that owners or operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b), notifications of compliance status required in 40 CFR 63.9(h), and performance test reports through the EPA’s Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For the notifications required in 40 CFR 63.9(b) and 63.9(j), owners and operators would be required to upload a PDF of the required notifications.

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests. The EPA is also requiring that 40

CFR Part 63, Subpart CCC performance test reports be submitted through the EPA's ERT.

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

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

3(a) Non-duplication

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as for state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, if the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent out directly to either the delegated state or local agency. If a state or local agency has adopted its own standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (86 FR 19256) on April 13, 2021. No comments were received on the burden published in the *Federal Register* for this renewal.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 100 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted the American Iron and Steel Institute

(AISI), at (202) 452-7100, the Steel Manufacturers Association, at (202) 296-1515, and the American Galvanizers Association, at (720) 554-0900.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

3(d) Effects of Less-Frequent Collection

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less-frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to these standards. The EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. The EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to either the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are steel pickling, HCl process facilities, and hydrochloric acid regeneration plants. The United States Standard Industrial Classification (SIC) codes for the respondents affected by these standards, and the corresponding North American Industry Classification System (NAICS) codes are shown below:

Standard (40 CFR Part 63, Subpart CCC)	SIC Codes	NAICS Codes
Iron and Steel Mills and Ferroalloy Manufacturing	3312	331110
Steel Wire Drawing	3315	331222
Rolled Steel Shape Manufacturing	3316	331221
Iron and Steel Pipe and Tube Manufacturing from Purchased Steel	3317	331210

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Steel Pickling, HCl Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC).

A source must make the following reports:

Notifications	
Notification that area source has become subject to the rule requirements	§§63.9(b)(1), 63.1163(a)(1)
Notification of rule applicability	§§63.9(a)(2), 63.1163(a)(2)
Application of construction or reconstruction	§§63.9(b)(3-4), 63.1163(a)(3-4)
Application of intent to construct new affected source	§§63.9(b)(5), 63.1163(a)(5)

Notifications	
Request for an extension of compliance	§63.1163(b)
Notification that source is subject to special compliance requirements	§63.1163(c)
Notification of performance tests	§§63.7(b), 63.9(e), 63.1163(d)
Notification of compliance status	§§63.9(h), 63.1163(e)
Notification of demonstration of continuous monitoring system	§63.9(g)
Notification of changes in information (reclassification to area source status or to revert to major source status) (electronic submission)	§63.9(b), §63.9(j)

Reports	
Report of initial and periodic performance test results (electronic submission)	§§63.10(d)(2), 63.1164(a)
Demonstration of continuous monitoring system, if applicable	§63.9(g)
Progress reports, if applicable	§§63.6(i), 63.1164(b)
Semiannual report including reporting of malfunctions and monitoring exceedances/no excess emissions	§§63.10(e)(3), 63.1164(c)

A source must keep the following records:

Recordkeeping	
Occurrence and duration of malfunctions and any maintenance performed on the air pollution control equipment	§§63.10(b)(2), 63.1165(a)(1)-(4)
All measurements needed to demonstrate compliance with the standard	§§63.1165(a)(5)
Initial and subsequent performance test results	§§63.1165(a)(6)
Emission test results and other data needed to demonstrate a source is meeting waiver requirements	§§61.13(g), 63.1165(a)(7)
All reports, notifications, and applicability determinations	§§63.10(b), 63.1165(a)(8)-(10)
Records for sources with continuous monitoring systems	§§63.10(c), 63.1165(b)

Recordkeeping	
For hydrochloric acid regeneration plant, daily record of each inspection for each requirement under the maintenance program for all required systems and components	§63.1160(b)(2)(iii)
Records are required to be retained for five years	§§63.1165

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

The rule was amended to include electronic reporting provisions on September 19, 2012 and November 19, 2020. Respondents are required to use the EPA's Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. Respondents are also required to submit electronic copies of notifications and certain reports through EPA's CEDRI. The notification is an upload of their currently-required notification in portable document format (PDF) file. For purposes of this ICR, it is assumed that there will be no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: *https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert*.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate systems for the measurement of process gas temperature, excess air proportion, make-up water flow, and recirculation flow rate for web scrubbers or other parameters established during the performance test for an alternative control device.

Respondent Activities
Perform initial performance test, Reference Method 1, 2, 3, 4 and 26A tests, and repeat performance tests if necessary. Establish operating parameters for control devices (e.g., scrubbers) and the process parameters required to be monitored for hydrochloric acid regeneration plants (i.e., process off gas temperature and proportion of excess air fed to the process).
Prepare an operation and maintenance plan for each emission control device.
For hydrochloric acid regeneration plant, develop and implement a written maintenance program for all required systems and components.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

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

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

5(b) Collection Methodology and Management

Following the 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 standards 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. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. The EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses); however, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulations. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Steel Pickling, HCl Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The

individual burdens are expressed under standardized headings believed to be consistent with the concept of 'Burden' under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 35,000 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of these regulations, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	$153.55 ($73.12 + 110%)
Technical	$122.20 ($58.19 + 110%)
Clerical	$61.51 ($29.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standards are both labor costs, which are addressed elsewhere in this ICR, and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to these regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Flow-meters with high/low alarms	$830	0	$0	$106	100	$10,600
TOTAL			$0			$10,600

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

The total capital/startup costs for this ICR are $0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $10,600. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to this industry over the next three years of the ICR is estimated to be $10,600. These are the record-keeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA's overall compliance and enforcement program includes such activities as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be $50,100.

This cost is based on the average hourly labor rate as follows:

Managerial	$69.04 (GS-13, Step 5, $43.15 + 60%)
Technical	$51.23 (GS-12, Step 1, $32.02 + 60%)
Clerical	$27.73 (GS-6, Step 3, $17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA

Burden and Cost – NESHAP for Steel Pickling, HCl Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (Renewal).

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next three years, approximately 100 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 100 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents [1]	(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	100	0	0	100
2	0	100	0	0	100
3	0	100	0	0	100
Average	0	100	0	0	100

[1] New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 100.

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
Notification of applicability	0	1	0	0

Total Annual Responses				
Notification of construction/reconstruction	0	1	0	0
Notification of anticipated startup	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of special compliance requirements	0	1	0	0
Notification of initial performance test	0	1	0	0
Notification of compliance status	0	1	0	0
NESHAP waiver application	0	1	0	0
Report of initial performance test	0	1	0	0
Report of periodic performance test	100	1	0	100
Report of monitoring exceedances, including results of annual performance test	20	2	0	40
Report of no excess emissions, including results of annual performance test	80	2	0	160
			Total	300

The number of Total Annual Responses is 300.

The total annual labor costs are $4,130,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Steel Pickling, HCl Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 35,000 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Steel Pickling, HCl Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 117 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $10,600. 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 1,010 labor hours at a cost of $50,100; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Steel Pickling, HCl Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

6(f) Reasons for Change in Burden

There is no change in burden from the most-recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for this industry is very low or non-existent, so there is no significant change in the overall burden. Since there are no changes in the regulatory requirements and there is no significant industry growth, there are also no changes in the capital/startup and/or operation and maintenance (O&M) costs. There is a slight increase in costs, which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (March 2021) to calculate respondent burden costs. This ICR also adjusts the number of responses from the currently-approved ICR to account for the submittal of periodic test reports; this corrects the annual average hours per response, but the burden to the respondents does not change.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information

is estimated to average 117 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information; processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2021-0092. An electronic version of the public docket is available at ***http://www.regulations.gov/***, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. Due to COVID-19 precautions, entry to the Reading Room is available by appointment only. Please contact personnel in the Reading Room to schedule an appointment. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2021-0092 and OMB Control Number 2060-0419 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NESHAP for Steel Pickling, HCl Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (Renewal)

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 [a]	(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 [b]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarization with regulatory requirements	1	1	1	100	100	5	10	$13,603
B. Required activities								
Initial performance test [c]	125	1	125	0	0	0	0	$0
Repeat initial performance test [c]	125	0.2	25	0	0	0	0	$0
Periodic performance tests [d, e]	125	1	125	100	12,500	625	1,250	$1,700,343.75
Operation and maintenance plan	40	1	40	0	0	0	0	$0
Operation and maintenance plan revision [f]	20	1	20	10	200	10	20	$27,205.50
C. Create information	See 3B							
D. Gather existing information	See 3B							
E. Write Report								
Notification of applicability [g]	2	1	2	0	0	0	0	$0
Notification of construction/reconstruction [g]	2	1	2	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 [a]	(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 [b]
Notification of anticipated startup [g]	2	1	2	0	0	0	0	$0
Notification of actual startup [g]	2	1	2	0	0	0	0	$0
Notification of special compliance requirements	N/A							
Notification of initial performance test [g]	2	1	2	0	0	0	0	$0
Notification of compliance status [g]	4	1	4	0	0	0	0	$0
NESHAP waiver application [h]	N/A							
Report of initial and periodic performance tests	See 3B							
Report of monitoring exceedances, including malfunctions [i]	16	2	32	20	640	32	64	$87,057.60
Report of no excess emissions [j]	8	2	16	80	1,280	64	128	$174,115.20
Reporting Subtotal						***16,928***		***$2,002,325***
4. Recordkeeping requirements								
A. Familiarization with regulatory requirements	See 3A							
B. Plan activities	See 3B							
C. Implement Activities	See 3B							

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 [a]	(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 [b]
D. Develop record system	N/A							
E. Time to enter information								
Records of all information required by standards [k]	3	52	156	100	15,600	780	1,560	$2,122,029.00
F. Time to train personnel	4	1	4	0	0	0	0	$0
G. Time to transmit or disclose information [l]	0.25	3	0.75	100	75	3.75	7.5	$10,202.06
H. Time for audits	N/A							
Recordkeeping Subtotal					***18,026***			***$2,132,231***
TOTAL LABOR BURDEN AND COST (rounded) [m]					**35,000**			**$4,130,000**
TOTAL CAPITAL and O&M COSTS (rounded) [m]								**$10,600**
GRAND TOTAL (rounded) [m]								**$4,140,000**

Assumptions:

[a] We have assumed that there are approximately 100 respondents subject to the standard (95 steel pickling and 5 acid regeneration facilities). We have further assumed that no additional respondent per year will become subject to the regulation in the next three years. Since there are no new respondents estimated, initial performance tests, initial operation and maintenance plans, and initial notifications do not apply.

[b] This ICR uses the following labor rates: $153.55 per hour for Executive, Administrative, and Managerial labor; $122.20 per hour for Technical labor, and $61.51 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021 "Table 2: Civilian workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for

the benefit packages available to those employed by private industry.
[c] We have assumed that each new respondent will be required to conduct an initial performance test and 20 percent will have to repeat this test. Since there are no new respondents estimated, these requirements do not apply.
[d] Each respondent is required to conduct a periodic performance test to measure either: (1) the HCl mass flows at the control device inlet and outlet or (2) the concentration of HCl exiting the control device. The test results must be reported within 2 months of the test date. Periodic performance tests must be conducted either annually or according to an alternative schedule that is approved by the applicable permitting authority, but no less frequently than every 2.5 years or twice per title V permit term. We are assuming that all periodic performance tests are conducted annually.
[e] We have assumed that it will take 125 hours for each respondent to complete the periodic performance test and report.
[f] We have assumed that 10 percent of respondents must write a revised operation and maintenance plan for each emission control device.
[g] We have assumed that all new sources will be required to meet initial notification requirements. Since there are no new respondents estimated, these requirements do not apply.
[h] We have assumed that no respondent will request a NESHAP waiver application.
[i] We have assumed that 20 percent of respondents will report excess emissions on a semiannual basis.
[j] We have assumed that 80 percent of respondents will report no excess emissions on a semiannual basis.
[k] We have assumed that each respondent will take three hours each week to record all information required by the standard.
[l] We have assumed that each respondent will take 15 minutes three times per year to transmit or disclose information.
[m] Totals have been rounded to 3 significant values. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Steel Pickling, HCl Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (Renewal)

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year [a]	(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) Cost, $ [b]
Report Review								
New Sources								
Notification of applicability [c]	2	1	2	0	0	0	0	$0
Notification of construction/ reconstruction [c]	2	1	2	0	0	0	0	$0
Notification of actual startup [c]	2	1	2	0	0	0	0	$0
Notification of special compliance requirements	N/A							
Notification of initial performance test [c]	2	1	2	0	0	0	0	$0
Notification of compliance status [c]	2	1	2	0	0	0	0	$0
Review of initial performance test report [d]	4	1	4	0	0	0	0	$0
Review of repeat initial performance test report [d, e]	4	0.2	0.8	0	0	0	0	$0
Existing Sources								
Review of excess emissions report [f]	4	2	8	20	160	8	16	$8,749.44
Review of no excess emissions report [g]	2	2	4	80	320	16	32	$18,386.18

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year [a]	(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) Cost, $ [b]
Review of periodic performance test report [h]	4	1	4	100	400	20	40	$22,982.72
Review of waiver application [i]	2	1	2	0	0	0	0	$0
TOTAL (rounded) [j]					**1,010**			**$50,100**

Assumptions:

[a] We have assumed that there are approximately 100 respondents subject to the standard. We have further assumed that no additional respondent per year will become subject to the regulation in the next three years. Since there are no new respondents estimated, initial performance tests and initial notifications do not apply.

[b] This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: $69.04 for Managerial (GS-13, Step 5), $51.23 for Technical (GS-12, Step 1) and $27.73 Clerical (GS-6, Step 3). These rates are from the Office of Personnel Management (OPM) "2021 General Schedule", which excludes locality rates of pay.

[c] We have assumed that all new sources will be required to meet initial notification requirements. Since there are no new respondents estimated, these requirements do not apply.

[d] We have assumed that the Agency will take 4 hours to participate in the performance tests. Since there are no new respondents estimated, these requirements do not apply.

[e] We have assumed that 20 percent of new respondents will have to repeat the performance tests due to failure. Since there are no new respondents estimated, these requirements do not apply.

[f] We have assumed that 20 percent of respondents will report excess emissions on a semiannual basis.

[g] We have assumed that 80 percent of respondents will report no excess emissions on a semiannual basis.

[h] Periodic performance tests are submitted at least twice every 5 years (title V permit term), but may be required by the permitting authority to be submitted as frequently as annually. We assume that all periodic performance tests are conducted annually.

[i] We have assumed that no waiver application is expected.

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