

**Table 1: Annual Respondent Burden and Cost - NESHAP for Steel Pickling, HCl Process Facilities and H**

Burden item	(A)	(B)	(C)	(D)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting requirements				
A. Familiarization with regulatory requirements	1	1	1	100
B. Required activities				
Initial performance test <sup>c</sup>	125	1	125	0
Repeat initial performance test <sup>c</sup>	125	0.2	25	0
Periodic performance tests <sup>d, e</sup>	125	1	125	100
Operation and maintenance plan	40	1	40	0
Operation and maintenance plan revision <sup>f</sup>	20	1	20	10
C. Create information	See 3B			
D. Gather existing information	See 3B			
E. Write Report				
Notification of applicability <sup>g</sup>	2	1	2	0
Notification of construction/reconstruction <sup>g</sup>	2	1	2	0
Notification of anticipated startup <sup>g</sup>	2	1	2	0
Notification of actual startup <sup>g</sup>	2	1	2	0
Notification of special compliance requirements	N/A			
Notification of initial performance test <sup>g</sup>	2	1	2	0
Notification of compliance status <sup>g</sup>	4	1	4	0
NESHAP waiver application <sup>h</sup>	N/A			
Report of initial and periodic performance tests	See 3B			
Report of monitoring exceedances, including malfunctions <sup>i</sup>	16	2	32	20
Report of no excess emissions <sup>j</sup>	8	2	16	80
<b>Reporting Subtotal</b>				
4. Recordkeeping requirements				
A. Familiarization with regulatory requirements	See 3A			
B. Plan activities	See 3B			

C. Implement Activities	See 3B			
D. Develop record system	N/A			
E. Time to enter information				
Records of all information required by standards <sup>k</sup>	3	52	156	100
F. Time to train personnel	4	1	4	0
G. Time to transmit or disclose information <sup>l</sup>	0.25	3	0.75	100
H. Time for audits	N/A			
<b>Recordkeeping Subtotal</b>				
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>m</sup></b>				
<b>TOTAL CAPITAL and O&amp;M COSTS (rounded)<sup>m</sup></b>				
<b>GRAND TOTAL (rounded)<sup>m</sup></b>				

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 100 respondents subject to the standard (95 steel pickling and 5 acid respondent per year will become subject to the regulation in the next three years. Since there are no new respondent plans, and initial notifications do not apply.

<sup>b</sup> This ICR uses the following labor rates: \$153.55 per hour for Executive, Administrative, and Managerial labor; \$ labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021 “Table 1 from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit pack

<sup>c</sup> We have assumed that each new respondent will be required to conduct an initial performance test and 20 percent these requirements do not apply.

<sup>d</sup> Each respondent is required to conduct a periodic performance test to measure either: (1) the HCl mass flows at the control device. The test results must be reported within 2 months of the test date. Periodic performance tests must be approved by the applicable permitting authority, but no less frequently than every 2.5 years or twice per title V permit conducted annually.

<sup>e</sup> We have assumed that it will take 125 hours for each respondent to complete the periodic performance test and report

<sup>f</sup> We have assumed that 10 percent of respondents must write a revised operation and maintenance plan for each emission

<sup>g</sup> We have assumed that all new sources will be required to meet initial notification requirements. Since there are no

<sup>h</sup> We have assumed that no respondent will request a NESHAP waiver application.

<sup>i</sup> We have assumed that 20 percent of respondents will report excess emissions on a semiannual basis.

<sup>j</sup> We have assumed that 80 percent of respondents will report no excess emissions on a semiannual basis.

<sup>k</sup> We have assumed that each respondent will take three hours each week to record all information required by the standard

<sup>l</sup> We have assumed that each respondent will take 15 minutes three times per year to transmit or disclose information

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

**hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (Renewal)**

(E)	(F)	(G)	(H)
Technical person- hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Cost per year <sup>b</sup>
100	5	10	\$13,603
0	0	0	\$0
0	0	0	\$0
12,500	625	1,250	\$1,700,343.75
0	0	0	\$0
200	10	20	\$27,205.50
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
640	32	64	\$87,057.60
1,280	64	128	\$174,115.20
<b>16,928</b>			<b>\$2,002,325</b>

Total Number of Respondents	
Number of sources established in 2012 final rule amendments	100

15,600	780	1,560	\$2,122,029.00
0	0	0	\$0
75	3.75	7.5	\$10,202.06
<b>18,026</b>			<b>\$2,132,231</b>
<b>35,000</b>			<b>\$4,130,000</b>
			<b>\$10,600</b>
			<b>\$4,140,000</b>

total # Response: 300  
hr/response 117

id regeneration facilities). We have further assumed that no additional  
s estimated, initial performance tests, initial operation and maintenance

.122.20 per hour for Technical labor, and \$61.51 per hour for Clerical  
2: Civilian workers, by occupational and industry group.” The rates are  
ages available to those employed by private industry.

will have to repeat this test. Since there are no new respondents estimated,

he control device inlet and outlet or (2) the concentration of HCl exiting  
st be conducted either annually or according to an alternative schedule that  
rmit term. We are assuming that all periodic performance tests are

port.

ission control device.

) new respondents estimated, these requirements do not apply.

tandard.

n.

**Respondant Rates**

(Source: United States Department of Labor, Bureau of Labor Statistics, March 2021, "Table 2. Civilian Workers, by occupational and industry group.")

<b><u>Labor Type</u></b>	<b><u>Total Compensation (\$/hr)</u></b>	<b><u>Loaded Rate (Rate + 110%rate)</u></b>
Mgmt.	\$73.12	\$153.55
Tech.	\$58.19	\$122.20
Cler.	\$29.29	\$61.51

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Steel Pickling, HCl Process Facilities and H<sub>2</sub>**

Activity	(A)	(B)	(C)	(D)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>
Report Review				
New Sources				
Notification of applicability <sup>c</sup>	2	1	2	0
Notification of construction/ reconstruction <sup>c</sup>	2	1	2	0
Notification of actual startup <sup>c</sup>	2	1	2	0
Notification of special compliance requirements	N/A			
Notification of initial performance test <sup>c</sup>	2	1	2	0
Notification of compliance status <sup>c</sup>	2	1	2	0
Review of initial performance test report <sup>d</sup>	4	1	4	0
Review of repeat initial performance test report <sup>d, e</sup>	4	0.2	0.8	0
Existing Sources				
Review of excess emissions report <sup>f</sup>	4	2	8	20
Review of no excess emissions report <sup>g</sup>	2	2	4	80
Review of periodic performance test report <sup>h</sup>	4	1	4	100
Review of waiver application <sup>i</sup>	2	1	2	0
<b>TOTAL (rounded) <sup>j</sup></b>				

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 100 respondents subject to the standard. We have further assumed that there are no new respondents estimated, initial performance tests and initial notifications do not occur in the next three years.

<sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government benefits: \$17.33 per hour for General Technical (GS-12, Step 1) and \$27.73 Clerical (GS-6, Step 3). These rates are from the Office of Personnel Management.

<sup>c</sup> We have assumed that all new sources will be required to meet initial notification requirements. Since there are no new sources, there are no initial notifications.

<sup>d</sup> We have assumed that the Agency will take 4 hours to participate in the performance tests. Since there are no new respondents, there are no repeat performance tests.

<sup>e</sup> 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, there are no repeat performance tests.

<sup>f</sup> We have assumed that 20 percent of respondents will report excess emissions on a semiannual basis.

<sup>g</sup> We have assumed that 80 percent of respondents will report no excess emissions on a semiannual basis.

<sup>h</sup> Periodic performance tests are submitted at least twice every 5 years (title V permit term), but may be required by title V that all periodic performance tests are conducted annually.

<sup>i</sup> We have assumed that no waiver application is expected.

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

**Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (Renewal)**

(E)	(F)	(G)	(H)
Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ <sup>b</sup>
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
160	8	16	\$8,749.44
320	16	32	\$18,386.18
400	20	40	\$22,982.72
0	0	0	\$0
<b>1,010</b>			<b>\$50,100</b>

(GS- 12, step 1) - Tech.
(GS- 13, step 5) - Mgmt.
(GS-6, step 3) - Cler.

that no additional respondent per year will become subject to the regulation in the event that it applies.

Management overhead expenses: \$69.04 for Managerial (GS-13, Step 5), \$51.23 for non-Management (OPM) "2021 General Schedule", which excludes locality rates of pay.

If no new respondents estimated, these requirements do not apply.

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If there are no new respondents estimated, these requirements do not apply.

The permitting authority to be submitted as frequently as annually. We assume



Hourly Mean Wage	With Fringe & Overhead
32.02	\$51.23
43.15	\$69.04
17.33	\$27.73

**Agency Rates**  
Source: Office of Personnel  
Management (OPM), 2021  
General Schedule

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

(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost (B X C)
Flow-meters with high/low alarms	\$830	0	\$0

(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M Costs (E X F)
\$106	100	\$10,600