

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ)  
(Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal), EPA ICR Number 2267.08, OMB Control Number 2060-0605.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) were proposed on September 17, 2007; promulgated on January 2, 2008 (73 FR 252); and revised on September 10, 2020 (85 FR 56080) as a result of the technology review required under Section 112(d)(6) of the Clean Air Act (CAA). These regulations apply to both new and existing iron and steel foundries that are area sources of hazardous air pollutants (HAP) emissions. There are different requirements for area source foundries based on size. Existing foundries with an annual metal melt production greater than 20,000 tons and new foundries with an annual melt capacity of 10,000 tons are classified as large foundries. Existing foundries with an annual metal melt production of 20,000 tons or less and new foundries with an annual melt capacity of 10,000 tons or less are classified as small foundries. Research and development facilities are not covered by this rule. New facilities include those that commenced construction, modification or reconstruction after the original date of proposal (September 17, 2007). This information is being collected to assure compliance with 40 CFR Part 63, Subpart ZZZZZ.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain this file for at least five years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

There are approximately 390 iron and steel foundry area source facilities, which are owned and operated by the iron and steel industry. None of the 390 facilities in the United States are owned by either state, local, or tribal entities or 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. The ‘burden’ to the Affected Public may be found below in Table 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal) and Table 1b: Annual Respondent Burden and Cost for Large Foundries – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal). The Federal Government’s ‘burden’ is attributed to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal).

Based on our consultations with industry representatives, there is one affected facility 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 390 respondents per year will be subject to these standards, and 0 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, HAP emissions from iron and steel foundry area source facilities 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 ZZZZZ.

## **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 the 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.

Additionally, the EPA is requiring electronic reporting for certain notifications or reports. The EPA requires that owners or operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b), notifications of changes in information already provided required in 40 CFR 63.9(j), performance test reports, and semiannual reports through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For semiannual reports, EPA has developed a template for the reporting form in CEDRI specifically for 40 CFR Part 63, Subpart ZZZZZ.

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests. EPA is also requiring that 40 CFR Part 63, Subpart ZZZZZ 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

ZZZZZ.

### **3(a) Non-duplication**

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

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

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (86 FR 8634) on February 8, 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 this standard, 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 390 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and that these standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Foundry Society, at 1-800-537-4237, and the Indiana Cast Metals Association, at 317-974-1830.

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

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

**4(b) Information Requested**

**(i) Data Items**

In this ICR, all the data that are recorded or reported is required by the NESHAP for Iron and Steel Foundries Area Sources (40 CFR Part 63, Subpart ZZZZZ).

A source must make the following reports:

<b>Notifications</b>	
Notification of applicability	§§63.9(b)(2), 63.10890(b), 63.10899(d)
Notification of compliance status	§§63.9(h)(1), 63.10890(c), 63.10900
Notification of initial classification or any reclassification	§§63.10880(f) and (g), 63.10881(d) and (e), 63.10890(g), 63.10899(d)
Notification of compliance extension	§63.9(c)
Notification construction/reconstruction	§63.9(b)(5)
Notification of startup	§63.9(b)(4)
Notification of performance test (large foundries only)	§63.9(e)
Notification of performance evaluation	§63.9(g)
Notification to use a previous performance test (large foundries only)	§63.10898(a)(2)
Notification of request to conduct a performance test to revise the operating limit	§63.10898(l)(1)
Notification of reclassification to area source status or to revert back to major source status (electronic submission)	§§63.9(b), 63.9(j)

<b>Notifications</b>	
Notification of EPA system outage for CEDRI or CDX systems or claim of force majeure	§63.10899(f)(4) and (g)(2)

<b>Reports</b>	
Semiannual compliance report (electronic submission)	§§63.8(c)(7)-(8), 63.10890(f), 63.10899(c)
Operation and maintenance plan (large foundries only)	§63.10896(a)
Site-specific monitoring plan for mercury switch removal, if elected	§63.10885(b)(1)
Site-specific test plan when multiple sources are controlled by a single device (large foundries only)	§§63.7(c)(2)-(3), 63.10898(g)
Site-specific CMS performance evaluation test plan	§§63.8(d)(2), 63.10899(b)(14)
Performance test results (large foundries only) (electronic submission)	§§63.10898(a),(b), and (i), 63.10899(e)
CMS performance evaluation test results (large foundries only)	§§63.8(e)(5), 63.10899(e)

A source must keep the following records:

<b>Recordkeeping</b>	
Material specifications – written materials specifications, records that demonstrate compliance with requirements for restricted metallic scrap, general scrap, mercury, and scrap that does not contain motor vehicle scrap.	§§63.10890(e)(2), 63.10899(b)(1),
Mercury – records of number of mercury switches removed or weight of mercury recovered, estimated number of vehicles processed, estimate the percent of mercury switches recovered; records identifying each scrap provider and documenting the scrap provider's participation in an approved mercury switch removal program	§§63.10890(e)(3)-(4), 63.10899(b)(2)-(3),
Non-methanol binder chemical formulations - Material Safety Data Sheet, certified product data sheet, or a manufacturer's hazardous air pollutant data sheet.	§§63.10890(e)(5), 63.10899(b)(4),
Annual quantity and composition of each HAP-containing chemical	§§63.10890(e)(6),

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

### 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 recently amended to include electronic reporting provisions on September 10, 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, including notification in the event of reclassification to area source status and to sources that revert to major source status, and semiannual compliance reports. The notification is an upload of their currently required notification in portable document format (PDF) file. The semiannual reports are to be created using Form 5900-521, the electronic template included with this Supporting Statement. The template is an Excel spreadsheet which can be partially completed and saved for subsequent semiannual reports to limit some of the repetitive data entry. It reflects the reporting elements required by the rule and does not impose additional reporting elements. The OMB Control Number is displayed on the Welcome page of the template, with a link to an online repository that contains the PRA requirements. For purposes of this ICR, it is assumed that there is 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**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Perform initial and ongoing performance tests referenced Methods in Appendix A, part 60, (i.e., Methods 1, 2, 3, 4, and 5 or 29 for stack PM/metal HAP testing; Method 9 or 22 for opacity) (large foundries only).
Install, operate and maintain appropriate CPMS for control devices used to comply with the standard’s PM or metal HAP emissions limits at a new iron and steel foundry (new affected sources, large foundries only).
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for 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.

<b>Respondent Activities</b>
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:

<b>Agency Activities</b>
Observe initial and ongoing performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

**5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source’s initial capability to comply with the emission standards, and to 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**

A small entity for this industry is defined by the U.S. Small Business Administration as a firm having no more than 500 employees. Based on information collected during the development of the 2020 final rule, approximately 301 of the 390 iron and steel foundries are small entities. Approximately 45 percent (34 of 75) of the large iron and steel foundries (annual metal melt production greater than 20,000 tons) are owned by small entities, while 85 percent (267 of 315) of the small iron and steel foundries are owned by small entities. The final rule includes a specific compliance option for small foundries that provides a maximum degree of operational flexibility, while the ICR requirements are the minimum necessary to demonstrate compliance.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown at the end of this document in both Table 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal) and Table 1b: Annual Respondent Burden and Cost for Large Foundries – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (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 12,970 hours (Total Labor Hours from Table 1c: Annual Respondent Burden and Cost for All Foundries – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal) below). These hours are based on Agency studies and background documents from the development of this regulation, 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	\$149.84 (\$71.35 + 110%)
Technical	\$122.66 (\$58.41 + 110%)
Clerical	\$60.88 (\$28.99 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, “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 only costs to the regulated industry resulting from information collection activities required by the subject standards are labor costs. There are no capital/startup and/or operation and maintenance costs for this specific ICR.

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

The only type of industry costs associated with the information collection activity in these regulations are labor costs. There are no capital/startup and/or operation and maintenance costs for this specific ICR.

## **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 \$56,000.

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 Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (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 390 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 390 per year. A total of 315 of the 390 facilities have an annual metal melt production of 20,000 tons or less, thus they are classified as small foundries. The remaining 75 facilities have an annual metal melt production greater than 20,000 tons and are classified as large foundries.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	390	0	0	390
2	0	390	0	0	390
3	0	390	0	0	390
Average	0	390	0	0	390

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 390.

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Initial notifications	0	0	0	0
Notification of Foundry Reclassification	0	0	0	0
Notification of Performance Test for PM (large foundries)	75	0.2	0	15
Report of performance test (through CEDRI using ERT)	75	0.2	0	15
Semiannual compliance reports (all foundries)	390	2	0	780
			Total	810

The number of Total Annual Responses is 810.

The total annual labor costs are \$1,540,000. Details regarding these estimates may be found at the end of this document in the following tables: 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal), 1b: Annual Respondent Burden and Cost for Large Foundries – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal), and 1c: Annual Respondent Burden and Cost for All Foundries – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (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 1a through 1c and 2 at the end of this document, respectively, and summarized below.

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

The total annual labor hours are 12,970 hours. Details regarding these estimates may be found in the following tables: 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal), 1b: Annual Respondent Burden and Cost for Large Foundries – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal), and 1c: Annual Respondent Burden and Cost for All Foundries – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (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 16 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 1,120 labor hours at a cost of \$56,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (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 an adjustment decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This decrease is not due to any program changes. There are no changes in the regulatory requirements and there is no significant industry growth since the most-recently approved ICR was developed. The previous ICR reflected those burdens and costs associated with certain one-time activities including reviewing recordkeeping systems, adjusting methods, and training employees as a result of the 2020 rule revisions (85 FR 56080). This ICR, by and large, reflects the on-going burden and costs for existing facilities. 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 2020) to calculate respondent burden costs.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 16 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-2020-0641. 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-2020-0641 and OMB Control Number 2060-0605 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 1a: Annual Respondent Burden and Cost for Small Foundries – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZZ) (Renewal)**

Burden item	(A) Person hours per occurrence <sup>e</sup>	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year <sup>b</sup>
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Familiarization with Regulatory Requirements <sup>a</sup>	0.5	1	0.5	315	158	7.9	15.8	\$21,458
B. Required activities								
Repeat performance tests for opacity	N/A							
Scrap specifications <sup>c</sup>	4	1	4	0	0	0	0	\$0
Monthly emission averaging calculation	N/A							
No methanol binder formulation <sup>d</sup>	0	0	0	0	0	0	0	\$0
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Initial notification of applicability <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of compliance status <sup>c</sup>	4	1	4	0	0	0	0	\$0
Notification of construction/reconstruction <sup>c</sup>	N/A							

Notification of actual startup <sup>c</sup>	N/A							
Notification of foundry reclassification <sup>e</sup>	1	0	0	0	0	0	0	\$0
Request for compliance extension <sup>c</sup>	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 <sup>c</sup>	N/A							
Startup, shutdown, and malfunction plan/reports	N/A							
Report of performance test (through CEDRI using ERT) <sup>c</sup>	N/A							
Semiannual compliance reports	4	2	8	315	2520	126	252	\$343,325
<b>Subtotal for Reporting Requirements</b>						<b>3,079</b>		<b>\$364,783</b>
5. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	See 4A							
B. Plan activities <sup>f</sup>	2	1	2	0	0	0	0	\$0
C. Implement activities <sup>f</sup>	2	1	2	0	0	0	0	\$0
D. Develop record system <sup>f</sup>	1	1	1	0	0	0	0	\$0
E. Time to enter information <sup>g</sup>	0.1	52	5.2	315	1,638.0	81.90	163.80	\$223,161.12
F. Time to transmit or disclose information	0.25	2	0.5	315	158	7.88	15.75	\$21,457.80
G. Time to adjust existing ways <sup>f</sup>	1	1	1	0	0	0	0	\$0
F. Time to train personnel <sup>f</sup>	2	1	2	0	0	0.0	0.0	\$0
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>2,065</b>		<b>\$244,619</b>

<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>b</sup></b>					<b>5,140</b>	<b>\$609,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>b</sup></b>						<b>\$0</b>
<b>GRAND TOTAL (rounded)<sup>b</sup></b>					<b>5,140</b>	<b>\$609,000</b>

**Assumptions:**

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

<sup>b</sup> This ICR uses the following labor rates: \$149.84 per hour for Executive, Administrative, and Managerial labor; \$122.66 per hour for Technical labor, and \$60.88 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> One-time only costs for new sources.

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

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

<sup>f</sup> One-time activities from ICR No. 2267.07. We have assumed that all small foundries already reviewed record keeping systems, adjusted methods, and trained employees during the first year after the 2020 rule amendments (85 FR 56080). Subsequent years, these activities would not be needed.

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

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

**Table 1b: Annual Respondent Burden and Cost for Large Foundries – NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZ) (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 <sup>a</sup>	(E) Technical person-hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year <sup>b</sup>
1. Applications	N/A							
2. Surveys and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Familiarization with Regulatory Requirements <sup>a</sup>	1	1	1	75	75	3.8	7.5	\$10,218
B. Required activities								
On-going Performance Test for PM <sup>c</sup>	70	0.2	14	75	1050.0	52.50	105.00	\$143,052
On-going Performance Test for Opacity <sup>d</sup>	3	2	6	75	450.0	22.50	45.00	\$61,308
Scrap material specifications <sup>e</sup>	4	1	4	0	0	0	0	\$0
Prepare operation & maintenance plan <sup>e</sup>	8	1	8	0	0	0	0	\$0
No methanol binder formulation <sup>e</sup>	4	1	4	0	0	0	0	\$0
Initial performance tests <sup>e</sup>	70	0	0	0	0	0	0	\$0
Initial and periodic inspections of PM control devices, monthly inspection of capture systems <sup>f</sup>	2	12	24	75	1800	90	180	\$245,232
Monthly emissions averaging calculations <sup>g</sup>	0.25	12	3	37.5	112.5	5.625	11.25	\$15,327
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
Initial notification of applicability <sup>e</sup>	4	1	4	0	0	0	0	\$0
Notification of compliance status <sup>e</sup>	8	1	8	0	0	0	0	\$0
Notification of construction/reconstruction <sup>e</sup>	N/A							

Notification of actual startup <sup>e</sup>	N/A							
Notification of foundry reclassification <sup>h</sup>	1	0	0	0	0	0	0	\$0
Request for compliance extension <sup>c</sup>	N/A							
Notification of repeat PM performance test <sup>c</sup>	1	0.2	0.2	75	15.0	0.75	1.50	\$2,044
Site specific test plan <sup>e</sup>	0	0	0	0	0	0	0	\$0
Notification of performance evaluation <sup>e</sup>	N/A							
Quality assurance plan for CEMS/COMS <sup>e</sup>	N/A							
NESHAP waiver request <sup>e</sup>	N/A							
Startup, shutdown, and malfunction plan/reports	N/A							
Report of performance test (through CEDRI using ERT) <sup>c</sup>	8	0.2	1.6	75	120.0	6.00	12.00	\$16,349
Semiannual compliance reports <sup>i</sup>	8	2	16	75	1200	60.0	120.0	\$163,488
<b>Subtotal for Reporting Requirements</b>						<b>5,546</b>		<b>\$657,017</b>
5. Recordkeeping Requirements								
A. Familiarization with Regulatory Requirements	See 4A							
B. Plan activities <sup>l</sup>	4	1	4	0	0	0	0	0
C. Implement activities <sup>l</sup>	4	1	4	0	0	0	0	0
D. Develop record system <sup>l</sup>	2	1	2	0	0	0	0	0
E. Time to enter information <sup>k</sup>	0.5	52	26	75	1,950	97.5	195.0	\$265,668
F. Time to transmit or disclose information <sup>k</sup>	0.25	2	0.5	75	38	1.9	3.8	\$5,109
G. Time to adjust existing ways <sup>l</sup>	2	1	2	0	0	0	0	\$0
F. Time to train personnel <sup>l</sup>	4	1	4	0	0	0.0	0.0	\$0
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>2,286</b>		<b>270,777</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>l</sup></b>						<b>7,830</b>		<b>\$928,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>l</sup></b>								<b>\$0</b>
<b>GRAND TOTAL (rounded)<sup>l</sup></b>						<b>7,830</b>		<b>\$928,000</b>

**Assumptions:**

<sup>a</sup> This table is specific to area source foundries classified as large iron and steel foundries. There are an estimated 390 area source foundries, 75 of which are expected to be classified as large foundries. No new area source foundries are projected during the 3-year term of this ICR. We assume all respondents will have to spend time familiarizing themselves with

regulatory requirements each year.

<sup>b</sup> This ICR uses the following labor rates: \$149.84 per hour for Executive, Administrative, and Managerial labor; \$122.66 per hour for Technical labor, and \$60.88 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal melting furnace subject to a PM or total metal HAP limit in §63.10895(c) at least every 5 years (or 0.2 averaged on a yearly basis) and will not implement a performance test due to a change to an operating limit or a process change likely to increase HAP emissions over the period of this ICR. A notification is required.

<sup>d</sup> We have assumed that all foundries would need to conduct performance tests to demonstrate compliance with the opacity limit in §63.10895(e) at least every 6 months and will not implement a process change likely to increase fugitive emissions over the 3 year period of this ICR. Opacity performance tests should be conducted over 3-hour period as specified in §63.6(h)(5)(ii). Assume one observation location can be used per foundry. No separate notification required.

<sup>e</sup> One-time only costs for new sources.

<sup>f</sup> We have assumed that all large foundries must conduct inspection of control device and capture system.

<sup>g</sup> We assumed half of the large area source foundries ( $75/2 = 37.5$ ) would use the emissions averaging provisions.

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

<sup>i</sup> We have assumed all large foundries will have to submit semi-annual compliance reports.

<sup>j</sup> One-time activities from ICR No. 2267.07. We have assumed that all large foundries already reviewed record keeping systems, adjusted methods, and trained employees during the first year of the 2020 rule amendments (85 FR 56080). Subsequent years, these activities would not be needed.

<sup>k</sup> We have assumed that large foundries must record information to demonstrate compliance with pollution prevention management practices for metallic scrap and binder formulations and information to demonstrate compliance with monitoring; inspection; operation and maintenance; startups, shutdowns, and malfunctions; and other requirements of the General Provisions (40 CFR part 63, subpart A). In addition, record to record information to demonstrate compliance with the PM and opacity standards.

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

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

<b>Category</b>	<b>Reporting Hours</b>	<b>Recordkeeping Hours</b>	<b>Total Labor Hours</b>	<b>Labor Cost</b>	<b>Number of Responses</b>
Small Foundry	3,079	2,065	5,140	\$609,000	630
Large Foundry	5,546	2,286	7,830	\$928,000	180
<b>Total</b>	<b>8,625</b>	<b>4,350</b>	<b>12,970</b>	<b>\$1,540,000</b>	<b>810</b>

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

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person-hours per year (CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
Report Review:								
Initial notification of applicability <sup>c</sup>	1	1	1	0	0	0	0	\$0
Notification of compliance status <sup>c</sup>	2	1	2	0	0	0	0	\$0
Notification of performance test <sup>d</sup>	1	0.2	0.2	75	15.0	0.75	1.50	\$861.83
Performance test report <sup>d</sup>	2	0.2	0.4	75	30.0	1.50	3.00	\$1,723.65
Semiannual compliance report - small <sup>a</sup>	1	2	2	315	630	31.5	63.0	\$36,196.65
Semiannual compliance report - large <sup>a</sup>	2	2	4	75	300	15.0	30.0	\$17,236.50
<b>TOTAL BURDEN AND COST (rounded)<sup>e</sup></b>						<b>1,120</b>		<b>\$56,000</b>

**Assumptions:**

<sup>a</sup> Taking into account shutdown data for foundries, we have assumed that there are 390 existing iron and steel foundries that are area sources. No new sources are projected during the 3-year term of this ICR. A total of 315 of the 390 facilities are small foundries and 75 are large foundries. All foundries have to submit semiannual compliance reports.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$69.04 (GS-13, Step 5, \$43.15 + 60%), Technical 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 rates are from the Office of Personnel Management (OPM) “2021 General Schedule” which excludes locality rates of pay.

<sup>c</sup> One-time only costs for new sources.

<sup>d</sup> We have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal melting furnace subject to a PM or total metal HAP limit in §63.10895(c) at least every 5 years (or 0.2 averaged on a yearly basis) and will not implement a performance test due to change to an operating limit or a process change likely to increase HAP emissions.

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

**Appendix A – Draft Electronic Reporting Template  
(see Docket ID Number EPA-HQ-OAR-2020-0641)**