

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

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

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

Assumptions:

^a This table is specific to area source foundries classified as small iron and steel foundries. A total of 315 of the 390 area source foundries are projected during the 3-year term of this ICR. We assume all respondents will have to spend time fam

^b This ICR uses the following labor rates: \$149.84 per hour for Executive, Administrative, and Managerial labor; \$122.66 rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, “Table 2. Civilian Wo “Total compensation.” The rates have been increased by 110% to account for the benefit packages available to those emp

^c One-time only costs for new sources.

^d We have assumed that no burden would be incurred for this requirement because all small area source foundries are alre

^e We have assumed that no small foundries will be reclassified as large foundries.

^f One-time activities from ICR No. 2267.07. We have assumed that all small foundries already reviewed record keeping s the 2020 rule amendments (85 FR 56080). Subsequent years, these activities would not be needed.

^g We have assumed that small foundries must record information to demonstrate compliance with pollution prevention ma

^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Small foundries are not i

undry Area Sources (40 CFR Part 63, Subpart ZZZZ) (Renewal)

122.66 149.84 60.88

(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
315	158	7.9	15.8	\$21,458
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
315	2520	126	252	\$343,325
		3,079		\$364,783
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
315	1,638.0	81.90	163.80	\$223,161.12
315	158	7.88	15.75	\$21,457.80
0	0	0	0	\$0
0	0	0.0	0.0	\$0

	2,065	\$244,619
	5,140	\$609,000
		\$0
	5,140	\$609,000

source foundries are small foundries and 75 are large foundries. No new area
 familiarizing themselves with regulatory requirements each year.

per hour for Technical labor, and \$60.88 per hour for Clerical labor. These
 workers, by occupational and industry group.” The rates are from column 1,
 employed by private industry.

ady meeting the no methanol requirement.

systems, adjusted methods, and trained employees during the first year after

management practices for metallic scrap and binder formulations.

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, Subpa

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

G. Time to adjust existing ways ^j	2	1	2	0
F. Time to train personnel ^j	4	1	4	0
G. Time for audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded)^l				
TOTAL CAPITAL AND O&M COST (rounded)^l				
GRAND TOTAL (rounded)^l				

Assumptions:

^a This table is specific to area source foundries classified as large iron and steel foundries. There are an estimated 390 area source foundries, 7 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 the rule.

^b This ICR uses the following labor rates: \$149.84 per hour for Executive, Administrative, and Managerial labor; \$122.66 per hour for Technicians. Labor rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, “Table 2. Civilian Workers, by occupation and occupation group.” The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c We have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal melting process 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 operational emissions over the period of this ICR. A notification is required.

^d We have assumed that all foundries would need to conduct performance tests to demonstrate compliance with the opacity limit in §63.10895 process change likely to increase fugitive emissions over the 3 year period of this ICR. Opacity performance tests should be conducted over 3 observation location can be used per foundry. No separate notification required.

^e One-time only costs for new sources.

^f We have assumed that all large foundries must conduct inspection of control device and capture system.

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

^h We have assumed that no foundries will be reclassified as small foundries.

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

^j One-time activities from ICR No. 2267.07. We have assumed that all large foundries already reviewed record keeping systems, adjusted metal emissions to meet 2020 rule amendments (85 FR 56080). Subsequent years, these activities would not be needed.

^k We have assumed that large foundries must record information to demonstrate compliance with pollution prevention management practices information to demonstrate compliance with monitoring; inspection; operation and maintenance; startups, shutdowns, and malfunctions; and (63, subpart A). In addition, record to record information to demonstrate compliance with the PM and opacity standards.

^l Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding. Large foundries are not assumed to incur any

art ZZZZ) (Renewal)

122.66 149.84 60.88

(E) Technical person- hours per year (E=CxD)	(F) Managemen t person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
75	3.8	7.5	\$10,218
1050.0	52.50	105.00	\$143,052
450.0	22.50	45.00	\$61,308
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
1800	90	180	\$245,232
112.5	5.625	11.25	\$15,327
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
15.0	0.75	1.50	\$2,044
0	0	0	\$0
120.0	6.00	12.00	\$16,349
1200	60.0	120.0	\$163,488
5,546			\$657,017
0	0	0	0
0	0	0	0
0	0	0	0
1,950	97.5	195.0	\$265,668
38	1.9	3.8	\$5,109

0	0	0	\$0
0	0.0	0.0	\$0
2,286			270,777
7,830			928,000
			\$0
7,830			\$928,000

75 of which are expected to be classified as large foundries. ing themselves with regulatory requirements each year.

ical labor, and \$60.88 per hour for Clerical labor. These al and industry group.” The rates are from column 1, lustry.

furnace subject to a PM or total metal HAP limit in ting limit or a process change likely to increase HAP

5(e) at least every 6 months and will not implement a l-hour period as specified in §63.6(h)(5)(ii). Assume one

thods, and trained employees during the first year of the

for metallic scrap and binder formulations and other requirements of the General Provisions (40 CFR part

y capital or O&M costs.

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

Category	Reporting Hours	Recordkeeping Hours	Total Labor Hours	Labor Cost
Small Foundry	3,079	2,065	5,140	\$609,000
Large Foundry	5,546	2,286	7,830	\$928,000
Total	8,625	4,350	12,970	\$1,540,000

16 hr per resp

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

Number of Responses
630
180
810

Table 2: Average Annual EPA Burden and Cost - NESHAP for Iron and Steel Foundry Area Sources (40 CFR Part 63, Subpart ZZZZ) (F

\$51.23 \$69.04

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (AxB)	(D) Plants per year ^a	(E) Technical person-hours per year (Cx D)	(F) Management person-hours per year (Ex0.05)
Report Review:						
Initial notification of applicability ^c	1	1	1	0	0	0
Notification of compliance status ^c	2	1	2	0	0	0
Notification of performance test ^d	1	0.2	0.2	75	15.0	0.75
Performance test report ^d	2	0.2	0.4	75	30.0	1.50
Semiannual compliance report - small ^a	1	2	2	315	630	31.5
Semiannual compliance report - large ^a	2	2	4	75	300	15.0
TOTAL BURDEN AND COST (rounded)^e						1,120

Assumptions:

^a Taking into account shutdown data for foundries, we have assumed that there are 390 existing iron and steel foundries that are area sources 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 four semiannual compliance reports.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead: \$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, rates are from the Office of Personnel Management (OPM) "2021 General Schedule" which excludes locality rates of pay.

^c One-time only costs for new sources.

^d We have assumed that large area source foundries will implement subsequent performance tests required by the rule for each metal 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 operating limit or a process change likely to increase HAP emissions.

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

Renewal)

\$27.73

(G) Clerical person-hours per year (Ex0.1)	(H) Cost, \$ ^b
0	\$0
0	\$0
1.50	\$861.83
3.00	\$1,723.65
63.0	\$36,196.65
30.0	\$17,236.50
	\$56,000

sources. No new sources are
ndries have to submit

head expenses: Managerial rate
, Step 3, \$17.33 + 60%). These

elting furnace subject to a PM or
test due to change to an

(A)	(B)	(C)	(D)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports
Initial Notification	0	0	0
Notification of Compliance Status	0	0	0
Notification of Foundry Reclassification	0	0	0
Notification of Performance Test for PM (large foundries)	75	0.2	0
Report of Performance Test for PM (large foundries)	75	0.2	1
Semiannual compliance reports (small foundries)	315	2	0
Semiannual compliance reports (large foundries)	75	2	0
			Total

(E)
Total Annual Responses
$E=(B \times C)+D$
0
0
0
15
15
630
150
810