

Table 1: Annual Respondent Burden and Cost – NESHAP for Iron and Steel Foundries (40 CFR

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. Reporting requirements				
a. Familiarize with regulatory requirements ^c	2	1	2	45
b. Required activities ^d				
i. Initial performance tests ^{d,e}	70	2	140	0
ii. On-going performance tests ^e	70	0.4	28	45
iii. On-going opacity observations ^f	6	2	12	45
iv. Operation and maintenance plan ^d	72	1	72	0
v. Scrap selection/inspection plan ^d	10	1	10	0
vi. Scrap inspection ^g	0.5	350	175	45
vii. Monthly inspections of capture systems, maintenance of control devices and monitoring systems, and mould vent ignition plan	2	12	24	25
c. Create information	See 3B			
d. Gather existing information	See 3B			
e. Write report				
i. Notification of applicability ^d	2	1	2	0
ii. Notification of construction/reconstruction ^d	2	1	2	0
iii. Notification of actual startup ^d	2	1	2	0
iv. Notification of special compliance requirements ^d	N/A			
v. Compliance extension request ^d	2	1	2	0
vi. Notification of performance test ^e	1	0.4	0.4	45
vii. Site-specific test plan ^d	20	3.8	76	0
viii. Notification of CEMS performance evaluation ^d	60	1	60	0
ix. CEMS QA plan ^d	40	1	40	0
x. Notification of compliance status ^d	8	1	8	0
xi. NESHAP waiver application	N/A			
xii. Report of performance test (through CEDRI using ERT) ^e	8	0.4	3.2	45
xiii. Semiannual compliance reports ^h	12	2	24	45
Subtotal for Reporting Requirements				
4. Recordkeeping requirements				
a. Familiarize with regulatory requirements ^c	See 3A			
b. Plan activities ⁱ	3	1	3	15

c. Implement activities ⁱ	6	1	6	15
d. Develop record system ^{i,j}	1	1	1	15
e. Time to enter information				
i. Cupola VOHAP work practice information ^k	0.5	52	26	15
ii. Other recordkeeping requirements ^l	0.5	52	26	45
f. Time to train personnel ⁱ	2	1	2	15
g. Time to adjust existing ways to comply with previously applicable requirements ⁱ	2	1	2	15
h. Time to transmit information ^m	0.25	2	0.5	45
i. Time for audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded) ⁿ				
CAPITAL AND O&M COST (rounded) ⁿ				
GRAND TOTAL (rounded) ⁿ				

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to this rule will be 45. We have assumed that
- ^b This ICR uses the following labor rates from the United States Department of Labor, Bureau of Labor Statistics, May 201
- ^c We have assumed that all respondents will have to familiarize with regulatory requirements each year.
- ^d We have assumed that existing respondents are in compliance with the initial rule requirements. New respondents would
- ^e Performance tests are required for particulate matter by Method 5 or total metal HAP by Method 29, for triethylamine by
- ^f Opacity performance tests should be conducted over 3-hour period as specified in §63.6(h)(5)(ii). Assumed average major
- ^g Assumed it would take 0.5 hours each operating day (assumed 350 operating days per year) to inspect scrap piles, scrap sh
- ^h We have assumed it will take 12 hours for each respondents to all the required information concerning deviations from an
- ⁱ Assume each foundry will review new electronic reporting forms and will plan, train, and implement recordkeeping activi
- ^j We have assumed that new respondents would of already have the technology and recordkeeping systems in place to mon
- ^k We have assumed that it will take each respondent 0.5 hours 52 times per year to enter information for cupola off blast pe
- ^l We have assumed that it will take each respondent 0.5 hours 52 times per year to enter other recordkeeping information.
- ^m We have assumed that it will take each of the respondents 15 minutes two times per year to transmit information.
- ⁿ Totals burden and costs have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

Part 63, Subpart EEEEE) (Proposed Amendments)

81.33 123.71 42.8

Salaries taken for NAICS 331500: F
 May 2018 [https://www.bls.](https://www.bls)

(E)	(F)	(G)	(H)
Technical person- hours per year	Management person hours per year	Clerical person hours per year	Total Cost per year, (\$) ^b
(E=CxD)	(F=Ex0.05)	(G=Ex0.1)	
90	4.5	9	\$8,262
0	0	0	\$0
1260	63	126	\$115,662
540	27	54	\$49,570
0	0	0	\$0
0	0	0	\$0
7875	393.75	787.5	\$722,890
600	30	60	\$55,077
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
18	0.9	1.8	\$1,652
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
144	7.2	14.4	\$13,219
1080	54	108	\$99,139
13,348			\$1,065,470
45	2.25	4.5	\$4,131

Occupation Code	Title
11-0000	Mgmt Occup
17-2081	Envir Engr
43-0000	Office and Admir

90	4.5	9	\$8,262
15	0.75	1.5	\$1,377
390	19.5	39	\$35,800
1170	58.5	117	\$107,401
30	1.5	3	\$2,754
30	1.5	3	\$2,754
22.5	1.125	2.25	\$2,065
2,061			\$164,543
15,400			\$1,230,000
			\$206,000
			\$1,440,000

that there will be no new foundries projected during the next three years of this ICR.

8, mean labor rates for Foundries (NAICS 331500) for Management Occupations (11-0000), Environmental Engineer (17-20

have to comply with the initial rule requirements including notification and performance test for add-on control devices.

Method 18, and VOHAP by Method 18 or 25A, depending on the emission source. Performance tests must be repeated once per source foundry would have two separate building openings to observe, so total duration is 6 hours. Tests must be repeated on equipment, or scrap suppliers, as appropriate, according to the scrap selection and inspection plan.

by emissions limitation or operation and maintenance requirements under the NESHAP rule into the electronic form template files during the first year. These activities will not be necessary in the second and third year of the ICR, so on average, there will be one test per day for its daily operations and to comply with existing regulations.

foundries. We have assumed that there are 15 respondents that have cupola melting furnaces.

Foundries

gov/oes/current/naics4_331500.htm

Mean Hourly Rate	110% OH and benefits	Estimated Total Pay with Benefits
58.91	64.80	123.71
38.73	42.60	81.33
20.38	22.42	42.8

081) and Office and Administrative Support (43-0000) . The rates have been increased by 110 percent to account for the b

every 5 years. Assumed each foundry has two controls requiring a performance test. Therefore, retest occurrence rate is 2
every 6 months for all foundries.

for each semiannual report.

will be 15 respondents per year $[(45 + 0 + 0)/3 = 15]$ for these activities during the 3-year period covered by the ICR.

Benefit packages available to those employed by private industry. Fully burdened hourly rates are: \$123.71 for management

0.4 tests/5 years = 0.4 test/years.

ent; \$81.33 for technical; and \$42.80 for clerical.

Table 1: Annual Respondent Burden and Cost – NESHAP for Iron and Steel Foundries (40 CFR

First Year

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. Reporting requirements				
a. Familiarize with regulatory requirements ^c	2	1	2	
b. Required activities ^d				
i. Initial performance tests ^{d,e}	70	2	140	
ii. On-going performance tests ^e	70	2	140	
ii. On-going opacity observations ^f	6	2	12	
iii. Operation and maintenance plan ^d	72	1	72	
iv. Scrap selection/inspection plan ^d	10	1	10	
v. Scrap inspection ^g	0.5	350	175	
vi. Monthly inspections of capture systems, maintenance of control devices and monitoring systems, and mould vent ignition plan	2	12	24	
c. Create information	See 3B			
d. Gather existing information	See 3B			
e. Write report				
i. Notification of applicability ^d	2	1	2	0
ii. Notification of construction/reconstruction ^d	2	1	2	0
iii. Notification of actual startup ^d	2	1	2	0
iv. Notification of special compliance requirements ^d	N/A			
v. Compliance extension request ^d	2	1	2	0
vi. Notification of performance test ^d	2	3.8	7.6	0
vii. Site-specific test plan ^d	20	3.8	76	0
viii. Notification of CEMS performance evaluation ^d	60	1	60	0
ix. CEMS QA plan ^d	40	1	40	0
x. Notification of compliance status ^d	8	1	8	0
xi. NESHAP waiver application	N/A			
xii. Report of performance test	8	0.4	3.2	45
xiii. Semiannual compliance reports ^h	1.635	2	3.27	
Subtotal for Reporting Requirements				
4. Recordkeeping requirements				
a. Familiarize with regulatory requirements ^c	See 3A			
b. Plan activities ⁱ	3	1	3	45

c. Implement activities ⁱ	6	1	6	45
d. Develop record system ^{i,j}	1	1	1	45
e. Time to enter information				
i. Cupola VOHAP work practice information ^k	0.5	52	26	15
ii. Other recordkeeping requirements ^l	0	52	0	
f. Time to train personnel ⁱ	2	1	2	45
g. Time to adjust existing ways to comply with previously applicable requirements ⁱ	2	1	2	45
h. Time to transmit information ^m	0.25	2	0.5	
i. Time for audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded) ⁿ				
CAPITAL AND O&M COST (rounded) ⁿ				
GRAND TOTAL (rounded) ⁿ				

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to this rule will be 45. We have assumed that
- ^b This ICR uses the following labor rates from the United States Department of Labor, Bureau of Labor Statistics, May 2011
- ^c We have assumed that all respondents will have to familiarize with regulatory requirements each year.
- ^d We have assumed that existing respondents are in compliance with the initial rule requirements. New respondents would
- ^e Performance tests are required for particulate matter by Method 5 or total metal HAP by Method 29, for triethylamine by
- ^f Assumed it would take 6 hours to conduct opacity performance tests of building openings for typical foundry; tests must be
- ^g Assumed it would take 0.5 hours each operating day (assumed 350 operating days per year) to inspect scrap piles, scrap sl
- ^h We have assumed it will take 12 hours for each respondents to all the required information concerning deviations from an
- ⁱ Assume each foundry will review new electronic reporting forms and will plan, train, and implement recordkeeping activi
- ^j We have assumed that new respondents would of already have the technology and recordkeeping systems in place to mon
- ^k We have assumed that it will take each respondent 0.5 hours 52 times per year to enter information for cupola off blast pe
- ^l We have assumed that it will take each respondent 0.5 hours 52 times per year to enter other recordkeeping information.
- ^m We have assumed that it will take each of the respondents 15 minutes two times per year to transmit information.
- ⁿ Totals burden and costs have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

270	13.5	27	\$24,785
45	2.25	4.5	\$4,131
390	19.5	39	\$35,800
0	0	0	\$0
90	4.5	9	\$8,262
90	4.5	9	\$8,262
0	0	0	\$0
1,173			\$93,631
1,300			\$106,800
			\$0
			\$107,000

0	1
0	1
0.5	52
0	52
0	1
0	1
0	2
N/A	

\$2,377.78

that there will be no new foundries projected during the next three years of this ICR.

8, mean labor rates for Foundries (NAICS 331500) for Management Occupations (11-0000), Environmental E

have to comply with the initial rule requirements including notification and performance test for add-on control Method 18, and VOHAP by Method 18 or 25A, depending on the emission source. Performance tests must be repeated every 6 months for all foundries.

equipment, or scrap suppliers, as appropriate, according to the scrap selection and inspection plan.

any emissions limitation or operation and maintenance requirements under the NESHAP rule into the electronic files during the first year. These activities will not be necessary in the second and third year of the ICR, so on a daily basis its daily operations and to comply with existing regulations.

foundries. We have assumed that there are 15 respondents that have cupola melting furnaces.

81.33 123.71 42.8

(C)	(D)	(E)	(F)	(G)	(H)
Person hours per respondent per year	Respondents per year ^a	Technical person- hours per year	Managem ent person hours per year	Clerical person hours per year	Total Cost per year, (\$) ^b
(C=AxB)		(E=CxD)	(F=Ex0.05)	(G=Ex0.1)	
2		0	0	0	\$0
140		0	0	0	\$0
140		0	0	0	\$0
12		0	0	0	\$0
72		0	0	0	\$0
10		0	0	0	\$0
175		0	0	0	\$0
24		0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
7.6	0	0	0	0	\$0
76	0	0	0	0	\$0
60	0	0	0	0	\$0
40	0	0	0	0	\$0
8	0	0	0	0	\$0
3.2	45	144	7.2	14.4	\$13,219
-4	45	-180	-9	-18	(\$16,523)
			-41		(\$3,305)
0	15	0	0	0	\$0

0	15	0	0	0	\$0
0	15	0	0	0	\$0
26	15	390	19.5	39	\$35,800
0		0	0	0	\$0
0	15	0	0	0	\$0
0	15	0	0	0	\$0
0		0	0	0	\$0
		449			\$35,800
		400			\$32,500
					\$0
					\$32,500

\$722.22

ngineer (17-2081) and Office and Administrative Support (43-0000) . The rates have been increased by 110 percent

ol devices.

: repeated once every 5 years. Assumed each foundry has two controls requiring a performance test. Assumed 20% of foundries (45*0.2 = 9 foundries) would conduct on-going p

form template for each semiannual report.

verage, there will be 15 respondents per year $[(45 + 0 + 0)/3 = 15]$ for these activities during the 3-year period cover

Salaries taken for NAICS 331500: Foundries

May 2018 https://www.bls.gov/oes/current/naics4_3

Occupation Code	Title	Mean Hourly Rate	Estimated Total Pay with Benefits
11-0000	Mgmt Occ	58.91	123.71
17-2081	Envir Engr	38.73	81.33
43-0000	Office and	20.38	42.8

to account for the benefit packages available to those employed by private industry. Fully burdened hourly rates are: \$12

performance tests each year.

ed by the ICR.

[31500.htm](#)

23.71 for management; \$81.33 for technical; and \$42.80 for clerical.

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

(A)	(B)	(C)	(D)	(E)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B x C)	Annual O&M Costs for One Respondent
Leak detectors	\$9,000	0	\$0	\$1,470
Flow rate monitors	\$7,500	0	\$0	\$2,000
pH monitor	\$7,500	0	\$0	\$2,000
Pressure drop	\$7,500	0	\$0	\$2,000
VOC CEM	\$100,000	0	\$0	\$10,000
Total ^b			\$0	

^a Assumes all 45 major source foundries use baghouse to meet melting PM limits. Estimated that 23 four

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

Costs

(F)	(G)
Number of Respondents with O&M	Total O&M, (E x F)
45	\$66,150
30	\$60,000
23	\$46,000
7	\$14,000
2	\$20,000
	\$206,000

foundries use TEA scrubber. Estimated that 7 foundries use wet scrubber for other PM control. Estimated that two fc

Laundries may use VOC CEMS.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Iron and Steel Foundries (40 CFR Part 63, Subpart EEEI

2019:

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
Attend performance test ^c	40	1	40	0
Report review				
Notification of special compliance requirements	N/A			
Notification of applicability ^d	2	1	2	0
Notification of performance test or CEMS performance evaluation ^e	1	0.4	0.4	45
CEMS QA plan ^d	2	1	2	0
Notification of compliance status ^d	4	1	4	0
Site-specific test plan ^d	2	1	2	0
Scrap selection/inspection plan ^d	4	1	4	0
Performance test report ^e	2	0.4	0.8	45
Semiannual compliance reports ^f	2	2	4	45
NESHAP waiver application ^d	4	1	4	0
Compliance extension request ^d	4	1	4	0
TOTAL BURDEN AND COST (rounded)^g				

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to this rule will be 45. There will be n
- ^b This cost is based on the following 2019 labor rates which incorporates a 1.6 benefits multiplication factor to accoun
- ^c We have assumed that EPA personnel would not attend any ongoing performance tests.
- ^d We have assumed that existing respondents are in compliance with the initial rule requirements. New respondents w
- ^e Performance tests are required for particulate matter by Method 5 or total metal HAP by Method 29, for triethylamin
- ^f We have assumed that all respondents are required to submit semiannual compliance reports.
- ^g Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Agency Worker Rates	labor Rates, \$/hr	60% Overhead	Total, \$/hr
Managerial (GS-13, step 5)	\$41.64	\$24.98	\$66.62
Technical (GS-12, step 1)	\$30.90	\$18.54	\$49.44
Clerical (GS-6, step 3)	\$16.72	\$10.03	\$26.75

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS_h.pdf

Effective January 2019

EE) (Proposed Amendments)

	\$49.44	\$66.62	\$26.75	
(E) Technical person- hours per year (CxD)	(F) Manageme nt person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b	
0	0	0	\$0	
0	0	0	\$0	
0	0	0	\$0	
18	1	2	\$998	
0	0	0	\$0	
0	0	0	\$0	
0	0	0	\$0	
0	0	0	\$0	
36	2	4	\$1,996	
180	9	18	\$9,980	
0	0	0	\$0	
0	0.0	0.0	\$0.00	
269			\$13,000	

o new foundries projected during the next three years of this ICR.

t for government overhead expenses: \$66.62 Managerial rate (GS-13, Step 5), \$49.44 Technical rate (GS-12, Step 1), and \$

ould have to comply with the initial rule requirements including notification and performance test for add-on control devic
e by Method 18, and VOHAP by Method 18 or 25A, depending on the emission source. Performance tests must be repeat

§26.75 Clerical rate (GS-6, Step 3). These rates are calculated from the hourly rates included in the Office of Personnel M

es.

ed once every 5 years. We assumed each foundry has two controls requiring a performance test. Therefore, retest occurre

Management (OPM) 2019 General Schedule which excludes locality rates of pay; the rates have been increased by 60 per

centage rate is 2 tests/5 years = 0.4 test/years.

percent to account for benefit packages available to government employees.

Information Collection Activity	Number of Respondents	Number of Responses
Initial Notification	0	0
Notification of Compliance Status	0	0
Notification of Foundry Reclassification	0	0
Notification of Performance Test for PM ^a	45	0.4
Report of performance test (through CEDRI using ERT)	45	0.4
Semiannual compliance reports	45	2

Average

Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses
	E=(BxC)+D
0	0
0	0
0	0
0	18
1	18
0	90
Total	126

3e response burden

122.22