ICR Summary Information	
Hours per Response	308
Number of Respondents	90
Total Estimated Burden Hours	56,700
Total Estimated Costs	$7,000,000
Annualized Capital O&M	$198,000
Total Annual Responses	184
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces a AA and AAa) (Renewal)

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (A x B)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting Requirements			
A. Read and understand rule requirements	1	1	1
B. Required activities			
Initial Performance tests [c]	364	1.64	596.96
Repeat Performance tests [c]	364	0.082	29.848
Monitoring of operations and emissions [d, e]			----------
D. Gather Existing Information			----------
E. Write report			
Notification of construction/modification	2	1	2
Notification of actual startup	2	1	2
Notification of initial performance test	2	1	2
Reports of performance test results			----------
Semiannual reports [f]	16	2	32
Subtotal for Reporting Requirements			
4. Recording Requirements			
A. Read and understand rule requirements			----------
B. Plan activities			----------
C. Implement activities			----------
D. Develop record system	N/A		
E. Time to enter and transmit information:			
Records of daily monitoring of operations [d]	0.75	350	262.5
Records of daily emissions monitoring by a certified observer [e, h]	0.5	350	175
Records of COMS [g, i]	0.5	350	175
Records of BLDS [h, i]	0.5	350	175
Records of static pressure on furnace [h]	0.5	350	175
F. Time to train personnel	N/A		
G. Time for audits	N/A		
Subtotal for Recordkeeping Requirements			
Total Labor Burden and Cost (rounded) [j]			
Total Capital and O&M Cost (rounded) [j]			
Grand Total (rounded) [j]			

Assumptions:

[a] We have assumed that there are an annual average of 89 sources currently subject to the NSPS, subparts AA and AAa. three-year period covered by this ICR renewal (1 new source per year). Therefore, the average number of respondents pe

[b] This ICR uses the following labor rates: $157.61 per hour for Executive, Administrative, and Managerial labor; $123.9 the United States Department of Labor, Bureau of Labor Statistics, Sept 2021, "Table 2. Civilian Workers, by occupation been increased by 110% to account for the varying industry wage rates and the additional overhead business costs of emp hiring, training, and equipping their employees.

[c] We have assumed that existing sources will not perform initial rule requirements including the initial performance test a performance tests due to failure. We have assumed 1.64 baghouses per new facility based on collected information from

[d] Daily monitoring of operations includes time and duration of each charge, time and duration of each tap, flow rate data checks of the equipment (e.g., physical appearance, pressure sensors, dampers, damper switches).

[e] Daily emissions monitoring includes stack emissions monitoring using a continuous opacity monitor if the source has a baghouse and has not elected the alternative option. In addition, the source is required to conduct fugitive emissions mor opacity observations using a certified visible emissions observer, it the source has an EAF equipped with a DEC.

[f] Sources are required to provide semiannual reports of opacity observations and operational values (i.e., furnace static pr the performance test, and of all shop opacity observations in excess of the emission limit.

[g] We have assumed that the new source will equip its EAFs with a DEC system and use a positive pressure baghouse, an

[h] We have assumed that approximately 51.7 percent of the respondents (or 46.53 respondents) will choose to comply wit continuously and 48.3 percent (43.47 respondents) will choose the alternative option of daily opacity shop observations b (BLDS).

[i] We have assumed that approximately 40 percent of respondents (36 respondents) use negative pressure baghouses. Of percent (12.02 respondents) have elected to use the alternative option of using BLDS monitoring couple with visible emi

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

and Argon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts

(D)	(E)	(F)	(G)	(H)
Number of Respondents per Year [a]	**Technical Hours per Year (C x D)**	**Management Hours per Year (E x 0.05)**	**Clerical Hours per Year (Ex0.1)**	**Total Labor Costs per Year, $ [b]**
90	90	4.5	9	$12,426.53
1	596.96	29.848	59.696	82,423.76
1	29.848	1	3	4,121.19
-----See 4E----------				
See 3B and 4E----------				
1	2	0.1	0.2	276.15
1	2	0.1	0.2	276.15
1	2	0.1	0.2	276.15
-----See 3B----------				
90	2,880	144	288	$397,648.80
		4,143		***$497,449***
-----See 3A----------				
-----See 3B----------				
-----See 3B----------				
90	23,625	1,181.25	2,362.50	$3,261,962.81
43.47	7,607.25	380.36	760.73	$1,050,352.03
23.98	4,195.8	209.79	419.58	$579,324.60
12.02	2,104.2	105.21	210.42	$290,532.15
46.53	8,142.75	407.14	814.28	$1,124,289.85
		52,526		***$6,306,461***
		56,700		**$6,800,000**
				$198,000
				$7,000,000

We have further assumed that 3 new sources will become subject to these subparts over the
r year is estimated to be 90.

4 per hour for Technical labor, and $62.52 per hour for Clerical labor. These rates are from
al and industry group." The rates are from column 1, "Total compensation." The rates have
oloying workers beyond their wages and benefits, including business expenses associated with

and notification requirements. We have assumed that 5 percent of new sources would repeat
existing sources (1.64 = 54 baghouses / 33 EAF facilities).

and pressure data. In addition, sources are required to conduct monthly operational status

an EAF equipped with a direct shell evacuation system (DEC) and uses a negative pressure
nitoring using a furnace static pressure monitoring device or by electing to perform shop

ressure, fan motor amperes) that exceed or are below (i.e, flow rates) those established during

nd therefore, will not be required to install a continuous opacity monitor (COMS).

h the fugitive emissions monitoring requirements by measuring the furnace static pressure
oy a certified visible emission observer couple with the use of bag leak detection systems

these, 66.6 percent (23.98 respondents) use COMS to measure stack emissions and 33.4
ssions observations instead of using COMS.

Labor Rates:	
Management	$157.61
Technical	$123.94
Clerical	$62.52

184 responses

308 hr/response

Table 2: Average Annual EPA Burden and Cost – NSPS for Steel Plants: Electric Arc Fu Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal)

Activity	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Plant Per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year [a]
Notification of construction/modification	2	1	2	1
Notification of actual startup	1	1	1	1
Notification of performance test [c]	0.5	1	0.5	1
Initial performance test (observed) [c]	24	1.64	39.36	1
Repeat Performance test (observed) [c]	24	0.082	1.968	1
Review Performance Test results [c]	8	1.05	8.4	1
Notification of COMS Demonstration	0.5	1	0.5	1
Semiannual reports	8	2	16	90
TOTAL (rounded) [d]				

Assumptions

[a] We have assumed that there are an annual average of 89 sources currently subject to the NSPS, subparts AA and become subject to these subparts over the three-year period covered by this ICR renewal (1 new source per year). estimated to be 90.

[b] This cost is based on the following labor rates: Managerial rate of $70.56 (GS-13, Step 5, $44.10 + 60%), Tech Clerical rate of $28.34 (GS-6, Step 3, $17.71 + 60%). These rates are from the Office of Personnel Management of pay. The rates have been increased by 60 percent to account for the benefit packages available to government e

[c] We have assumed that existing sources will not perform initial rule requirements including the initial performan percent of new sources would repeat performance tests due to failure. We have assumed 1.64 baghouses per new (1.64 = 54 baghouses / 33 EAF facilities).

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

rnaces and Argon Oxygen Decarburization

(E)	(F)	(G)	(H)
Technical Hours per Year (CxD)	**Management Hours per Year (Ex0.05)**	**Clerical Hours per Year (Ex0.1)**	**Costs per Year, $ [b]**
2	0.1	0.2	$117.46
1	0.05	0.10	$58.73
0.5	0.03	0.05	$29.37
39.36	2	4	$2,311.69
1.968	0.10	0.20	$115.58
8.4	0	1	$493.35
0.5	0.03	0.05	$29.37
1,440	72	144	$84,574.08
1,720			**$87,700**

Labor Rates:	
Management	$70.56
Technical	$52.37
Clerical	$28.34

ł AAa. We have further assumed that 3 new sources will
Therefore, the average number of respondents per year is

ınical rate of $52.37 (GS-12, Step 1, $32.73 + 60%), and
(OPM), 2022 General Schedule, which excludes locality rates
mployees.

ce test and notification requirements. We have assumed that 5
facility based on collected information from existing sources

Capital/Startup vs. Operation and Maintenance (O&M) Costs					
(A)	(B)	(C)	(D)	(E)	(F)
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	Number of Respondents with O&M
Continuous Opacity Monitors [a]	$25,000	0	$0	$7,500	23.98
Furnace Static Pressure Monitors [b]	$300	1	$300	$0	46.53
Volumetric Flow Rate Monitor [c]	$18,000	1	$18,000	$0	90
Totals (rounded) [d]			**$18,300**		

[a] We have assumed that approximately 40 percent of respondents (36 respondents) use negative pressure baghouses. Of these, (
(23.98 respondents) use COMS to measure stack emissions and 33.4 percent (12.02 respondents) have elected to use the alterna
using BLDS monitoring couple with visible emissions observations instead of using COMS.

[b] We have assumed that approximately 51.7 percent of the respondents (or 46.53 respondents) will choose to comply with the fu
emissions monitoring requirements by measuring the furnace static pressure continuously and 48.3 percent (43.47 respondents)
the alternative option of daily opacity shop observations by a certified visible emission observer couple with the use of bag leak
systems (BLDS).

[c] All respondents (90) are required to install flow rate monitors as part of the monitoring of operations rule requirements. The o
maintenance costs associated with the flow monitors are negligible.

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

(G)
Total O&M, (E X F)
$179,820
$0
$0
$180,000

66.6 percent
ative option of

ugitive
will choose
detection

perating and

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Notification of actual startup	1	1	0	1
Notification of construction/ modification	1	1	0	1
Notification of performance test	1	1	0	1
Reports of performance test results	1	1.05	0	1.05
Semiannual reports	90	2	0	180
			Total	**184**

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	**Number of New Respondents [a]**	**Number of Existing Respondents**	**Number of Existing Respondents that keep records but do not submit reports**	**Number of Existing Respondents That Are Also New Respondents**	**Number of Respondents (E=A+B+C-D)**
1	1	88	0	0	89
2	1	89	0	0	90
3	1	90	0	0	91
Average	**1**	**89**	0	0	**90**

[a] New respondents include sources with constructed and reconstructed affected facilities.