U.S. Environmental Protection Agency Information Collection Request

Title: NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC (Proposed Amendments)

OMB Control Number: 2060-0521

EPA ICR Number: 1995.01

Abstract: The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) were proposed on July 3, 2001 (66 FR 35325), promulgated on April 14, 2003 (68 FR 18007), and most-recently amended on August 2, 2005 (70 FR 44285). These regulations apply to pushing, soaking, quenching, and battery stacks on both existing and new coke oven batteries (coke plants) that are major sources of hazardous air pollutant (HAP) emissions. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart CCCCC.

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 the 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.

The proposed RTR amendments to the rule eliminate the startup, shutdown, and malfunction (SSM) exemption; remove the SSM plan requirement; add electronic submittal of notifications, semiannual reports, and performance test reports; add requirements for the control of mercury (Hg), total acid gases (hydrogen fluoride plus hydrogen chloride) (AG), hydrogen cyanide (HCN), and total polycyclic aromatic hydrocarbons (PAH) from pushing sources; Hg, particulate matter (PM), total AG, and HCN from battery stacks; Hg, PM, AG, total PAH from HRSG main stacks; and Hg PM, total AG, total PAH, and formaldehyde from HRSG bypass/waste heat stacks; and make technical and editorial changes. The remaining portions of the NESHAP remain unchanged.

The term "Affected Public" applies to owners or operators of coke manufacturing facilities. There are approximately 14 coke plants. None of the 14 facilities are owned by either state, or local, or tribal entities, or by the Federal government. All these facilities are owned and operated by privately-owned, for-profit businesses. The 'burden' to the Affected Public may be found below in Table 1: Annual

Respondent Burden and Cost – NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Proposed Amendments). The 'burden' to the Federal Government is attributed entirely 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 Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Proposed Amendments).

There are an average of 3.4 batteries at each coke plant site and each coke plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 14 respondents per year (operating 27 by-product batteries at 9 plants and 20 non-recovery batteries at 5 plants) will be subject to these standards. We estimate no additional respondents per year will become subject to these same standards.

Supporting Statement A

1. NEED AND AUTHORITY FOR THE COLLECTION

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate 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);
- D. keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical;
- E. submit compliance certifications in accordance with Section 114(a)(3); and
- F. provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from coke plants 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 CCCCC.

Section 112(d)(6) of the CAA requires the EPA to review the technology-based MACT standards and revise them "as necessary (taking into account developments in practices, processes, and control technologies)" no less frequently than every 8 years. In addition, section 112(f) of the CAA requires the EPA to determine whether the MACT emissions limitations provide an ample margin of safety to protect public health. For MACT standards for HAP "classified as a known, probable, or possible human carcinogen" that "do not reduce lifetime excess cancer risks to the individual most exposed to emissions from a source in the category or subcategory to less than 1-in-1 million," the EPA must promulgate residual risk standards for the source category (or subcategory) as necessary to provide an ample margin of safety to protect public health. In doing so, EPA may adopt standards equal to existing MACT standards, if the EPA determines that the existing standards are sufficiently protective. The EPA must also adopt more stringent standards, if necessary, to prevent an adverse environmental effect, but must consider cost, energy, safety, and other relevant factors in doing so.

2. PRACTICAL UTILITY/USERS OF THE DATA

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

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 to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with these standard 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 the 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 these standards are being met. The performance test may also be observed.

The required quarterly and semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

3. USE OF TECHNOLOGY

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Currently, 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. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically, which is reducing the reporting burden. As part of the proposed RTR amendments, respondents would be required to use the EPA's Electronic Reporting Tool (ERT) to submit performance test reports for test methods supported by the ERT. Respondents would also be required to submit notifications and semiannual reports through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI).

4. EFFORTS TO IDENTIFY DUPLICATION

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

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 either 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.

5. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES

¹ Test methods supported by the EPA's Electronic Reporting Tool (ERT) are listed on the EPA's ERT website (https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert). Data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT website must be included as an attachment in the ERT or alternate electronic file.

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation and proposed amendments. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

6. CONSEQUENCES OF LESS FREQUENT COLLECTION

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

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.

7. GENERAL GUIDELINES

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

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. 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. 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 the destruction or nonexistence of essential records.

Otherwise, the proposed collection does not create special circumstances requiring justification under 5 CFR 1320.5.

8. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

This section is not applicable because this is a rule-related ICR. Nevertheless, the ICR will be available for public review during the public comment period following publication of the proposed Subpart CCCCC RTR amendments in the *Federal Register*.

8b. Consultations

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Stakeholder outreach occurred with industry groups including American Coke and Coal Chemicals Institute (ACCCI) and member companies of this organization. Further stakeholder and public input is expected through public comment following publication of the proposed RTR amendments to Subpart CCCCC in the *Federal Register* and follow-up meetings with interested stakeholders.

In addition, the EPA/OAQPS conducted a two-part ICR (questionnaire and stack testing) in 2016 to gather data from the coke manufacturing industry. The results from the questionnaire part of this ICR were used in updating the burden estimates contained in this supporting statement.

9. PAYMENTS OR GIFTS TO RESPONDENTS

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

The Agency does not intend to provide payments or gifts to respondents as part of this collection.

10. ASSURANCE OF CONFIDENTIALITY

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

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).

11. JUSTIFICATION FOR SENSITIVE QUESTIONS

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The reporting or recordkeeping requirements in these standards or the proposed amendments do not include sensitive questions.

12. RESPONDENT BURDEN HOURS & LABOR COSTS

Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.

12a. Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements are owners and operators of coke plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed below:

| Standard (40 CFR Part 63, Subpart CCCCC) | SIC Codes | NAICS Codes |
|---|-----------|-------------|
| Iron and Steel Mills and Ferroalloy Manufacturing | 3312 | 331110 |
| All Other Petroleum and Coal Products Manufacturing | 3312 | 324199 |

Based on our research for this ICR, on average over the next three years, approximately 14 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 14 per year.

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

| | Number of Respondents | | | | | |
|------|--|---------------|---|---|---|--|
| | Respondents That St | ubmit Reports | Respondents That Do Not Submit Any Reports | | | |
| Year | (A) (B) Number of New Respondents ¹ Existing Respondents | | Number of New Number of Number of Existing Respondents ¹ Existing Respondents that | | (E) Number of Respondents (E=A+B+C-D) | |
| 1 | 0 | 14 | 0 | 0 | 14 | |

| | | Nu | ımber of Respondents | | |
|---------|---|----|----------------------|---|----|
| | | | | | |
| 2 | 0 | 14 | 0 | 0 | 14 |
| 3 | 0 | 14 | 0 | 0 | 14 |
| Average | 0 | 14 | 0 | 0 | 14 |

¹ 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 14.

12b. Information Requested

In this ICR, all the data that are recorded or reported is required by the NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) or would be required under the proposed amendments. Subpart CCCCC references 40 CFR Part 63, Subpart A for several general reporting and recordkeeping requirements that apply for all NESHAP.

A source must make the following reports:

| Notifications | |
|---|--|
| Initial notification requirements | §63.9(b), §63.7340(a) |
| Notification of opacity or visible emission observations (submitted concurrently with performance test) | §§63.6(h)(4-5), §63.9(f), §63.7340(a) |
| Notification of compliance status when a source becomes subject to the standard | §63.9(h), §63.7340(e) |
| Notification that source is subject to special compliance requirements, if applicable | §63.9(d) |
| Notification of performance test1 | §§63.7(b-c), §63.9(e), §63.7340(d) |
| Rescheduled of performance test | §63.7(b)(2) |
| Demonstration of continuous monitoring system | §63.8(e), §63.9(g), §63.7340(f) |
| Change in information already provided | §63.9(j) |
| Request for an extension of compliance with relevant standard | §63.9(c) |
| Request to use an alternative monitoring procedure | §63.8(f)(4) |

| Reports | |
|---|----------|
| Application for approval of the construction or reconstruction of a | §63.5(d) |
| new major affected source, or reconstruction of a major affected | |

| Reports | |
|--|-----------------|
| source | |
| Performance test results | §§63.10(d)(2-3) |
| Operation and maintenance plan for capture systems, control devices applied to pushing emissions, and by-product coke oven batteries | §§63.7300(b-c) |
| Plan for soaking emissions | §63.7294 |
| Plan to prevent green pushes from by-product coke oven batteries with horizontal flues | §63.7292 |
| Progress reports for compliance extension (if applicable) | §63.6(i)1 |
| Quarterly and semiannual compliance reports | §§63.7341(b-c) |

A source must keep the following records:

| Recordkeeping | |
|---|-------------------------------------|
| All reports and notifications | §63.10(b)(1), §63.7342(a)(1) |
| Records of visual observations | §63.7342(c) |
| Records demonstrating continuous compliance with applicable emission limitations, work practice standards, and operation and maintenance requirements | §63.7342(d) |
| Any applicability determination that demonstrates why owner or operator believes source is unaffected | §63.10(b)(3) |
| Records of maintenance of air pollution control equipment | §63.10(b)(2)(iii) |
| Records of performance tests, performance evaluations, and opacity and visible emissions observations | §63.10(b)(2)(viii), §63.7342(a) (3) |
| Five-year retention of records | §63.10(b)(1), §63.7343(b)1 |

12c. Respondent Activities

| Respondent Activities |
|---|
| Familiarization with the regulatory requirements. |
| Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for the control device. |
| Perform initial performance test, Reference Method 1; 2, 2F, or 2G; 3, 3A, or 3B; 4; 5 or 5D; 23; 26 or 26A; 29; 316; 320; CARB 429 test and repeat performance tests if necessary. |
| Write the notifications and reports listed above. |
| Enter information required to be recorded above. |

Respondent Activities

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.

Transmit, or otherwise disclose the information.

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

| Total Annual Responses | | | | |
|--|------------------------------|------------------------|--|--|
| (A) | (B) | (C) | (D) | (E) |
| Information Collection Activity | Number of Respondent s | Number of Responses | Number of Existing Respondents That Keep Records But Do Not Submit Reports | Total Annual Responses E=(BxC)+D |
| Notification of compliance status | 0 | 1 | 0 | 0 |
| Notification/application of construction | 0 | 1 | 0 | 0 |
| Notification of actual startup | 0 | 1 | 0 | 0 |
| Notification of performance test and test plan | 0 | 1 | 0 | 0 |
| Report of performance test results ¹ | 5.6 | 1 | 0 | 5.6 |
| Report of performance test results ² | 2.8 | 1 | 0 | 2.8 |
| Report of performance test results ³ | 2.8 | 1 | 0 | 2.8 |
| Report of performance test results ⁴ | 2.8 | 1 | 0 | 2.8 |
| Report of performance test results ⁵ | 1.8 | 1 | 0 | 1.8 |
| Report of performance test results ⁶ | 1.8 | 1 | 0 | 1.8 |
| Report of performance test results ⁷ | 1.8 | 1 | 0 | 1.8 |
| Report of performance test results ⁸ | 0.8 | 1 | 0 | 0.8 |
| Report of performance test results ⁹ | 0.8 | 1 | 0 | 0.8 |
| Report of performance test results ¹⁰ | 0.8 | 1 | 0 | 0.8 |

| Total Annual Responses | | | | | |
|--|-----|---|---------------------|-----|--|
| | | | | | |
| Report of performance test results ¹¹ | 0.8 | 1 | 0 | 0.8 | |
| Report of performance test results ¹² | 1 | 1 | 0 | 1 | |
| Report of performance test results ¹³ | 1 | 1 | 0 | 1 | |
| Report of performance test results ¹⁴ | 1 | 1 | 0 | 1 | |
| Report of performance test results ¹⁵ | 1 | 1 | 0 | 1 | |
| Report of performance test results ¹⁶ | 1 | 1 | 0 | 1 | |
| Report of semiannual compliance reports | 14 | 2 | 0 | 28 | |
| Report of quarterly compliance reports ¹⁷ | 9 | 4 | 0 | 36 | |
| | | | Total ¹⁸ | 92 | |

 $[\]overline{^1}$ There is an average of 5.6 respondents per year (14*0.4) submitting Method 5 (PM) performance test reports for pushing.

² There is an average of 2.8 respondents per year (14*0.2) submitting Method 29 (Hg) performance tests for pushing.

³ There is an average of 2.8 respondents per year (14*0.2) submitting Method 320 (AG and HCN) performance tests for pushing.

 $^{^4}$ There is an average of 2.8 respondents per year (14 * 0.2) submitting CARB 429 (PAH) performance tests for pushing.

⁵ There is an average of 1.8 respondents per year (9*0.2) submitting Method 29 (Hg) performance tests for ByP battery combustion stacks.

⁶ There is an average of 1.8 respondents per year (9*0.2) submitting Method 5 (PM) performance tests for ByP battery combustion stacks.

 $^{^{7}}$ There is an average of 1.8 respondents per year (9*0.2) submitting Method 320 (AG and HCN) performance tests for ByP battery combustion stacks.

⁸ There is an average of 0.8 respondents per year (4*0.2) submitting Method 29 (Hg) performance tests for HNR HRSG main stacks.

⁹ There is an average of 0.8 respondents per year (4*0.2) submitting Method 5 (PM) performance tests for HNR HRSG main stacks.

 $^{^{10}}$ There is an average of 0.8 respondents per year (4*0.2) submitting Method26/26A (AG) performance tests for HNR HRSG main stacks.

 $^{^{11}}$ There is an average of 0.8 respondents per year (4*0.2) submitting CARB 429 (PAH) performance tests for HNR HRSG main stacks.

 $^{^{12}}$ There is an average of 1.0 respondents per year (5*0.2) submitting Method 29 (Hg) performance tests for HNR HRSG bypass/waste heat stacks.

¹³ There is an average of 1.0 respondents per year (5*0.2) submitting Method 5 (PM) performance tests for HNR HRSG bypass/waste heat stacks.

 $^{^{14}}$ There is an average of 1.0 respondents per year (5*0.2) submitting Method 26/26A (AG) performance tests for HNR HRSG bypass/waste heat stacks.

¹⁵ There is an average of 1.0 respondents per year (5*0.2) submitting CARB 429 (PAH) performance tests for HNR HRSG bypass/waste heat stacks.

¹⁶ There is an average of 1.0 respondents per year (5*0.2) submitting Method 316 (formaldehyde) performance tests for HNR HRSG bypass/waste heat stacks.

¹⁷ 40 CFR 63.7341(b) requires quarterly reporting for the COMS systems monitoring opacity of emissions from stacks on the coke ovens at the eleven by-product recovery plants.

The number of Total Annual Responses is 92.

12d. Respondent Burden Hours and Labor Costs

The total annual labor hours are 32,500. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Proposed Amendments). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously-approved ICR, and any comments received.

This ICR uses the following labor rates:

Managerial \$163.17 (\$77.70 + 110%)

Technical \$130.28 (\$62.04 + 110%)

Clerical \$65.71 (\$31.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "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.

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 355 hours per response.

The total annual labor costs are \$4,230,000.

13. RESPONDENT CAPITAL AND O&M COSTS

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities. If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

¹⁸ Figures may not add exactly due to rounding.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The type of industry costs associated with the information collection activities in the subject standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

| | Capital/Startup vs. Operation and Maintenance (O&M) Costs | | | | | |
|-----------------------------------|---|-------------------------------|--|---|--|------------------------------|
| (A) Continuous Monitoring Device | (B) Capital/ Startup Cost for One Respondent | (C) Number of New Respondents | (D) Total Capital/Startu p Cost, (B X C) | (E) Annual O&M Costs for One Respondent | (F) Number of Respondent s with O&M | (G) Total O&M, (E X F) |
| Leak detectors | \$9,000 | 0 | \$0 | \$500 | 14 | \$7,000 |
| Continuous Opacity Monitors | \$37,000 | 0 | \$0 | \$8,421 | 14 | \$117,894 |
| Total | | | \$0 | | | \$125,000 |

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

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$125,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$125,000.

14. AGENCY COSTS

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

Agency Activities

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.

14b. Agency Labor Cost

The only costs to the Agency are those costs associated with analysis of the reported information. 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 \$50,740.

This cost is based on the average hourly labor rate as follows:

Managerial \$70.56 (GS-13, Step 5, \$44.10 + 60%)

Technical \$52.37 (GS-12, Step 1, \$32.73 + 60%)

Clerical \$28.34 (GS-6, Step 3, \$17.71 + 60%)

These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

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.

The average annual Agency burden and cost over next three years is estimated to be 1,015 labor hours at a cost of \$51,860; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Proposed Amendments).

14c. Agency Non-Labor Costs

There are no anticipated non-labor costs for the Agency.

15) REASONS FOR CHANGE IN BURDEN

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

This ICR is prepared for proposed RTR amendments to the NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR, Part 63, Subpart CCCCC). These proposed RTR amendments: (1) adjust references to the Part 63 General Provisions (40 CFR, Part 63, Subpart A) and revise provisions in the

NESHAP (40 CFR Part 63, Subpart CCCCC) to remove the SSM exemption and SSM plan requirement; (2) add requirements for the control of Hg, total AG, HCN, and total PAH from pushing sources; Hg, PM, total AG, and HCN from battery stacks; Hg, PM, AG, total PAH from HRSG main stacks; and Hg PM, total AG, total PAH, and formaldehyde from HRSG bypass/waste heat stacks; (3) add electronic submittal of notifications, semiannual reports, and performance test reports; and (4) make technical and editorial changes. Where applicable, adjustments for these proposed RTR amendments are reflected in Tables 1 and 2 of this ICR.

The number of affected facilities changed because of continued closures within the Coke Manufacturing industry, which reduced the number of facilities previously affected by Subpart CCCCC.

Costs per labor hour increased slightly due to increases in Technical and Clerical labor rates. The burden estimate for familiarizing with regulatory requirements was increased to reflect the actual time it would take industry to review the proposed amendments. Burden estimates were added for the industry to meet the requirements for the control of Hg, total AG, HCN, and total PAH from pushing sources; Hg, PM, total AG, and HCN from battery stacks; Hg, PM, AG, total PAH from HRSG main stacks; and Hg PM, total AG, total PAH, and formaldehyde from HRSG bypass/waste heat stacks, prepare notifications of performance test/performance evaluation, report the results of the performance tests through the ERT, prepare notification of compliance status, record failures to meet standards and actions taken to minimize emissions, conduct refresher training, transition to submitting notifications and semiannual reports through CEDRI, and compile data for semiannual reports. Burden estimates were removed for developing SSM plans and submitting periodic SSM reports.

16) PUBLICATION OF DATA

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

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 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. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

17) DISPLAY OF EXPIRATION DATE

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18) CERTIFICATION STATEMENT

Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions

BURDEN STATEMENT

Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 355 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.

Attachments

| Ref. | Title |
|------|--|
| 1. | Proposed Rule Document |
| 2. | Burden Calculation Tables |
| 3. | CEDRI & ERT PRA Pages & System Screenshots |

Table 1: Annual Respondent Burden and Cost – NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Proposed Amendments)

| Burden item | (A) Person hours per occurrence | (B) No. of occurrences per respondent per year | (C) Person hours per respondent per year (AxB) | (D) Respondents per year ^a | (E) Technical person- hours per year (CxD) | (F) Management person hours per year (Ex0.05) | (G) Clerical person hours per year (Ex0.1) | (H) Total Cost Per year ^b |
|--|---------------------------------------|--|--|---|---|---|---|---|
| 1. Applications | N/A | | | | | | | |
| 2. Survey and | | | | | | | | |
| Studies | N/A | | | | | | | |
| 3. Acquisition, Installation, and Utilization of Technology and | | | | | | | | |
| Systems | 40 | 1 | 40 | 0 | 0 | 0 | 0 | \$0 |
| 4. Reporting Requirements | | | | | | | | |
| A. Familiarize with rule requirement | 2 | 1 | 2 | 14 | 28 | 1.4 | 2.8 | \$4,060.27 |
| B. Required activities c, d | | | | | | | | |
| Method 5 performance test | 40 | 2.0 | 00 | 5.0 | 440 | 22.4 | 44.0 | #C4.0C4.2C |
| [PM] - Pushing e, c | 40 | 2.0 | 80 | 5.6 | 448 | 22.4 | 44.8 | \$64,964.26 |
| Method 29 performance test | | | | | | | | |
| [Hg]- Pushing ^f | 40 | 2.0 | 80 | 2.8 | 224 | 11.2 | 22.4 | \$32,482.13 |
| Method 320 performance test [AG+HCN] - | | | | | | | | |
| Pushing ^f | 40 | 2.0 | 80 | 2.8 | 224 | 11.2 | 22.4 | \$32,482.13 |
| CARB 429 performance test | 40 | 2.0 | 80 | 2.8 | 224 | 11.2 | 22.4 | \$32,482.13 |

| Burden item | (A) Person hours per occurrence | (B) No. of occurrences per respondent per year | (C) Person hours per respondent per year (AxB) | (D) Respondents per year ^a | (E) Technical person- hours per year (CxD) | (F) Management person hours per year (Ex0.05) | (G) Clerical person hours per year (Ex0.1) | (H) Total Cost Per year ^b |
|---|---------------------------------------|--|--|---|---|---|---|---|
| [PAH] - Pushing ^f | | | | | | | | |
| Method 29 | | | | | | | | |
| performance test | | | | | | | | |
| [Hg] - ByP Battery ^g | | | | | | | | |
| Combustion Stack | 40 | 2.8 | 112 | 1.8 | 201.6 | 10.08 | 20.16 | \$29,233.92 |
| Method 5 performance test [PM] - ByP Battery | | | | | | | | |
| g Combustion Stack | 40 | 2.8 | 112 | 1.8 | 201.6 | 10.08 | 20.16 | \$29,233.92 |
| Method 320 | 10 | 2.0 | 112 | 1.0 | 201.0 | 10.00 | 20.10 | Ψ23,233.32 |
| performance test [AG+HCN] - ByP Battery Combustion | | | | | | | | |
| Stack ^g | 40 | 2.8 | 112 | 1.8 | 201.6 | 10.08 | 20.16 | \$29,233.92 |
| Method 29 performance test [Hg] - HNR HRSG Main Stack ^h | 40 | 1.3 | 52 | 0.8 | 41.6 | 2.08 | 4.16 | \$6,032.40 |
| Method 5 | 10 | 1.5 | 32 | 0.0 | 11.0 | 2.00 | 1.10 | ψο,ουΣο |
| performance test [PM] - HNR HRSG Main Stack h | 40 | 1.3 | 52 | 0.8 | 41.6 | 2.08 | 4.16 | \$6,032.40 |
| Method 26/26A performance test [AG] - HNR HRSG | | | | | | | | |
| Main Stack h | 40 | 1.3 | 52 | 0.8 | 41.6 | 2.08 | 4.16 | \$6,032.40 |
| CARB 429 performance test [PAH] - HNR | | | | | | | | |
| HRSG Main Stack h | 40 | 1.3 | 52 | 0.8 | 41.6 | 2.08 | 4.16 | \$6,032.40 |
| Method 29 performance test - HNR HRSG Bypass/Waste Heat | | | | | | | | |
| Stack i | 40 | 10.6 | 424 | 1 | 424 | 21.2 | 42.4 | \$61,484.03 |

| Burden item | (A) Person hours per occurrence | (B) No. of occurrences per respondent per year | (C) Person hours per respondent per year (AxB) | (D) Respondents per year ^a | (E) Technical person- hours per year (CxD) | (F) Management person hours per year (Ex0.05) | (G) Clerical person hours per year (Ex0.1) | (H) Total Cost Per year ^b |
|---|---------------------------------------|--|--|---|---|---|---|---|
| Method 5 | | | | | | | | |
| performance test - HNR HRSG | | | | | | | | |
| Bypass/Waste Heat | | | | | | | | |
| Stack i | 40 | 10.6 | 424 | 1 | 424 | 21.2 | 42.4 | \$61,484.03 |
| Method 26/26A performance test - HNR HRSG Bypass/Waste Heat | | | | | | | | |
| Stack i | 40 | 10.6 | 424 | 1 | 424 | 21.2 | 42.4 | \$61,484.03 |
| CARB 429 performance test - HNR HRSG Bypass/Waste Heat | | | | | | | | |
| Stack i | 40 | 10.6 | 424 | 1 | 424 | 21.2 | 42.4 | \$61,484.03 |
| EPA Method 316 performance test - HNR HRSG Bypass/Waste Heat | 10 | 10.0 | 10.1 | | 10.1 | | 10.1 | 404 404 00 |
| Stack i | 40 | 10.6 | 424 | 1 | 424 | 21.2 | 42.4 | \$61,484.03 |
| Operation and maintenance plans for by-product coke oven batteries and capture systems and control devices applied to pushing | | | | | | | | |
| emissions | 40 | 1 | 40 | 0 | 0 | 0 | 0 | \$0 |
| Work practice plan for batteries with horizontal flues (one | | | | | | | | |
| plant) | 40 | 1 | 40 | 1 | 40 | 2 | 4 | \$5,800.38 |
| Method 9 daily observations for fugitive pushing | 3.4 | 365 | 1,225 | 14 | 17,155 | 857.8 | 1,715.5 | \$2,487,637.97 |

| Burden item | (A) Person hours per occurrence | (B) No. of occurrences per respondent per year | (C) Person hours per respondent per year (AxB) | (D) Respondents per year ^a | (E) Technical person- hours per year (CxD) | (F) Management person hours per year (Ex0.05) | (G) Clerical person hours per year (Ex0.1) | (H) Total Cost Per year ^b |
|-------------------------------|---------------------------------------|--|--|---|---|---|---|---|
| emissions ^j | | | | | | | | |
| Weekly sampling | | | | | | | | |
| for total dissolved | | | | | | | | |
| solids (TSD) k | 2.0 | 52 | 104 | 14 | 1,456.0 | 72.8 | 145.6 | \$211,133.83 |
| Monthly inspections | | | | | | | | |
| and maintenance of | | | | | | | | |
| affected sources, | | | | | | | | |
| control devices, and | | | | | | | | |
| continuous | | | | | | | | |
| parameter | | | | | | | | |
| monitoring systems | | | | | | | | \$48,723.19 |
| е | 2 | 12 | 24 | 14 | 336 | 16.8 | 33.6 | |
| C. Create | | | | | | | | |
| information | See 4B | | | | | | | |
| D. Gather existing | | | | | | | | |
| information | See 4B | | | | | | | |
| E. Write report | | | | 1 | | | | |
| Notification of | | | | | | | | |
| applicability | 2 | 1 | 2 | 0 | 0 | 0 | 0 | \$0 |
| Notification of | | | | | | | | |
| constr./reconstr. | 2 | 1 | 2 | 0 | 0 | 0 | 0 | \$0 |
| Notification of | | | | | | | | |
| anticipated startup | 2 | 1 | 2 | 0 | 0 | 0 | 0 | \$0 |
| Notification of | | | | | | | | |
| actual startup | 2 | 1 | 2 | 0 | 0 | 0 | 0 | \$0 |
| Notification of | | | | | | | | |
| special compliance | 2 | 1 | 2 | 0 | 0 | 0 | 0 | \$0 |
| Requirements | | | | 1 | | | | |
| Compliance | | | | | | | | |
| extension request | 2 | 1 | 2 | 0 | 0 | 0 | 0 | \$0 |
| Notification of | | | | | | | | |
| performance test ^c | 2 | 1.5 | 3 | 0 | 0 | 0 | 0 | \$0 |
| Site-specific test | | | | | | | | |
| plan | 40 | 1 | 40 | 0 | 0 | 0 | 0 | \$0 |

| Burden item | (A) Person hours per occurrence | (B) No. of occurrences per respondent per year | (C) Person hours per respondent per year (AxB) | (D) Respondents per year ^a | (E) Technical person- hours per year (CxD) | (F) Management person hours per year (Ex0.05) | (G) Clerical person hours per year (Ex0.1) | (H) Total Cost Per year ^b |
|--------------------------------------|---------------------------------------|--|--|---|---|---|---|---|
| Notification of | | | | | | | | |
| compliance status | 8 | 1 | 8 | 0 | 0 | 0 | 0 | \$0 |
| NESHAP waiver | | | | | | | | |
| application | N/A | | | | | | | |
| Report of | | | | | | | | |
| performance test 1 | See 4B | | | | | | | |
| Semiannual | | | | | | | | |
| compliance reports | | | | | | | | |
| 1 | 40 | 2 | 80 | 14 | 1120 | 56 | 112 | \$162,410.64 |
| Quarterly COMS | | | | | | | | |
| compliance reports | | | | | | | | |
| for battery stacks ^m | 12 | 4 | 48 | 9 | 432 | 21.6 | 43.2 | \$62,644.10 |
| Subtotal for | | | | | | | | |
| Reporting | | | | | | | | \$3,564,072 |
| Requirements | | | | | | 28,265 | | |
| 5. Recordkeeping Requirements | | | | | | | | |
| A. Familiarize with rule requirement | See 4A | | | | | | | |
| B. Plan activities | 3 | 1 | 3 | 0 | 0 | 0 | 0 | \$0 |
| C. Implement | | | | | | | | · |
| activities | 12 | 1 | 12 | 0 | 0 | 0 | 0 | \$0 |
| D. Develop record | | | | | | | | |
| system | 3 | 1 | 3 | 0 | 0 | 0 | 0 | \$0 |
| E. Time to enter | | | | | | | | |
| information | | | | | | | | |
| (through CEDRI | | | | | | | | |
| using ERT) | | | | | | | | |
| Report of other non- | | | | | | | | |
| performance test | | | | | | | | |
| submittals ⁿ | 4 | 52.0 | 208 | 14 | 2,912 | 146 | 291 | \$422,267.66 |
| Report of Method | | | | | | | | |
| 5 performance test - | | | | | | | | |
| Pushing ⁿ | 8 | 2.0 | 16 | 5.6 | 89.6 | 4.48 | 8.96 | \$12,992.85 |

| Burden item | (A) Person hours per occurrence | (B) No. of occurrences per respondent per year | (C) Person hours per respondent per year (AxB) | (D) Respondents per year ^a | (E) Technical person- hours per year (CxD) | (F) Management person hours per year (Ex0.05) | (G) Clerical person hours per year (Ex0.1) | (H) Total Cost Per year ^b |
|--|---------------------------------------|--|--|---|---|---|---|---|
| Report of Method | | | | | | | | |
| 29, 320, and CARB | | | | | | | | |
| 429 performance test - Pushing ⁿ | 24 | 2.0 | 48 | 2.8 | 134.4 | 6.72 | 13.44 | \$19,489.28 |
| Report of Method | 24 | 2.0 | 40 | 2.0 | 134.4 | 0.72 | 13.44 | \$19,409.20 |
| 29, 5, and 320 | | | | | | | | |
| performance tests - | | | | | | | | |
| ByP Battery | | | | | | | | |
| Combustion ⁿ | 24 | 2.8 | 67.2 | 1.8 | 120.96 | 6.048 | 12.096 | \$17,540.35 |
| Report of Method 29, 5, 26/26A, and CARB 429 performance tests - HNR HRSG Main Stack ⁿ | 32 | 1.3 | 41.6 | 0.8 | 33.28 | 1.664 | 3.328 | \$4,825.92 |
| 29, 5, 26/26A, CARB 429 and 316 performance tests - HNR HRSG Bypass/Waste Heat | 40 | 10.6 | 42.4 | | 42.4 | 24.2 | 40.4 | #C1 404 02 |
| Stack ⁿ F. Time to train | 40 | 10.6 | 424 | 1 | 424 | 21.2 | 42.4 | \$61,484.03 |
| personnel | 3 | 1 | 3 | 0 | 0 | 0 | 0 | \$0 |
| G. Time to adjust existing ways to comply with previously applicable | 3 | 1 | | U | U | U | U | 30 |
| requirements | 3 | 1 | 3 | 0 | 0 | 0 | 0 | \$0 |
| H. Time to transmit or disclose information I. Time for audits | See E | | | | | | | |
| 1. Time for audits | N/A | | | | | | | |

| Burden item | (A) Person hours per occurrence | (B) No. of occurrences per respondent per year | (C) Person hours per respondent per year (AxB) | (D) Respondents per year ^a | (E) Technical person- hours per year (CxD) | (F) Management person hours per year (Ex0.05) | (G) Clerical person hours per year (Ex0.1) | (H) Total Cost Per year ^b |
|------------------|---------------------------------------|--|--|---|---|---|---|---|
| Subtotal for | | | | | | | | |
| Recordkeeping | | | | | | | | |
| Requirements | | | | | | 4,271 | | \$538,600 |
| TOTAL LABOR | | | | | | | | |
| BURDEN AND | | | | | | | | |
| COST (rounded) ° | | | | | | 32,500 | | \$4,100,000 |
| Capital and O&M | | | | | | | | |
| Cost (rounded) ° | | | | | | | | \$125,000 |
| GRAND TOTAL | | | | | | | | \$4,230,000 |
| (rounded) ° | | | | | | | | |

Assumptions:

- ^a There is an average of 14 respondents (i.e., 9 coke plants operating 27 by-product (ByP) batteries and 5 coke plants operating 20 heat and/or nonrecovery (HNR) batteries). We have assumed that there will be no new sources subject to this regulation.
- ^b This ICR uses the following labor rates: \$163.17 per hour for Executive, Administrative, and Managerial labor; \$130.28 per hour for Technical labor, and \$65.71 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "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.
- ^c We have assumed existing respondents already comply with initial rule requirements and are in full compliance with periodic requirements including quarterly and semiannual reports. New respondents would have to comply with the initial rule requirements including notifications and performance tests for add-on control devices.
- ^d Monitoring and recordkeeping of operations for respondents include: monthly inspection of capture and control systems; daily Method 9 observations; weekly sampling for dissolved solids for quenching operations; work practices for batteries with horizontal flues (one plant); and Method 5 testing for particulate matter.
- ^e The rule requires that every 2.5 years (or 0.4 times per year over the 3 years of the ICR), each control device applied to pushing emissions must be sampled by Method 5 for particulate matter. We have determined that there is an average of 2.0 emission points per respondent (28 pushing units / 14 facilities) that need to be tested. There is an average of 5.6 respondents per year (14*0.4) submitting Method 5 performance test reports.
- ^f We are proposing Hg, AG, HCN, and PAH testing once every five years (or 0.2 times per year over the 3 years of the ICR), each control device applied to pushing emissions must be sampled by Method 29 for Hg; Method 320 for AG and HCN; and CARB 429 for PAH. We have determined that there is an average of 2.0 emission points per respondent (28 pushing units / 14 facilities) that need to be tested. There is an average of 2.8 respondents per year (14*0.2) submitting Method 29, 320, and CARB 429 performance test reports.
- ^g We are proposing Hg, PM, AG and AG testing once every five years (or 0.2 times per year over the 3 years of the ICR), each ByP battery combustion stack must be sampled by Method 29 for Hg, Method 5 for PM, and Method 320 for AG and HCN. We have determined that there is an average of 2.8 emission points per respondent (25 ByP battery combustion stacks / 9 ByP facilities) that need to be tested. There is an average of 1.8 respondents per year (9*0.2) submitting Method 29, 5, and 320 performance test reports.
- ^h We are proposing Hg, PM, AG, and PAH testing once every five years (or 0.2 times per year over the 3 years of the ICR), each HNR heat recovery steam

| Burden item | (A) Person hours per occurrence | (B) No. of occurrences per respondent per year | (C) Person hours per respondent per year (AxB) | (D) Respondents per year ^a | (E) Technical person- hours per year (CxD) | (F) Management person hours per year (Ex0.05) | (G) Clerical person hours per year (Ex0.1) | (H) Total Cost Per year ^b |
|-------------|---------------------------------------|--|--|---|---|---|---|---|
|-------------|---------------------------------------|--|--|---|---|---|---|---|

generator (HRSG) main stack must be sampled by Method 26 for Hg, Method 5 for PM, Method 26/26A for AG, and CARB 429 for PAH. We have determined that there is an average of 1.3 emission points per respondent (5 HNR HRSG main stacks / 4 heat recovery facilities) that need to be tested. There is an average of 0.8 respondents per year (4*0.2) submitting Method 29, 5, 26/26A, and CARB 429 performance test reports.

¹ We are proposing Hg, PM, AG, PAH, and Formaldehyde testing once every five years (or 0.2 times per year over the 3 years of the ICR), each HNR HRSG bypass/waste heat stack must be sampled by Method 29 for Hg, Method 5 for PM, Method 26/26A for AG, CARB 429 for PAH, and Method 316 for Formaldehyde. We have determined that there is an average of 10.6 emission points per respondent (53 HNR HRSG bypass/waste heat stacks / 5 HNR facilities) that need to be tested. There is an average of 1 respondents per year (5*0.2) submitting Method 29, 5, 26/26A, CARB 429 and 316 performance test reports.

^j Assumes one hour of observations per day per battery.

^k The measuring of the total dissolved solids (TDS) in the make-up water used for quenching is a requirement. In past analysis, we determined there is an average of 2.0 quenching towers per facility.

¹The rules requires the submittal of quarterly compliance reports for all battery stacks. If no deviation occurred and no continuous monitoring systems were out of control, only a summary report is required. For other affected sources, semiannual reports are required for any deviation from an emission limitation (including an operating limit), work practice standard, or O&M requirement.

^m 40 CFR 63.7341(b) requires quarterly reporting for the COMS monitoring opacity of emissions from the stacks on by-product recovery coke ovens, which are present at nine plants.

ⁿ Submittal of other non-performance reports through the EPA's CEDRI in ERT format is estimated to require 4 hours; submittal of performance test data through the EPA's CEDRI in ERT format is estimated to require 8 hours per test method report, includes keeping records of failures to meet the standards and the actions taken to minimize emissions.

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

Table 2: Average Annual EPA Burden and Cost – NESHAP for Coke Oven Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) (Proposed Amendments)

| Burden Item | (A) Person hours per occurrence | (B) No. of occurrences per plant per year | (C) Hours per plant per year (AxB) | (D) Plants per year ^a | (E) Technical person- hours per year (CxD) | (F) Management person hours per year (Ex0.05) | (G) Clerical person hours per year (Ex0.1) | Cost Per year |
|---|---------------------------------------|--|---|-------------------------------------|--|---|---|---------------|
| Initial performance test | 40 | 1 | 40 | 0 | 0 | 0 | 0 | \$0 |
| Repeat performance test-Retesting preparation | 2 | 1 | 2 | 0 | 0 | 0 | 0 | \$0 |
| Repeat performance- Retesting | 40 | 1 | 40 | 0 | 0 | 0 | 0 | \$0 |
| Report Review | | | | | | | | |
| Notification of construction/reconstruction Notification of anticipated startup | N/A | | | | | | | |
| Notification of actual startup | N/A N/A | | | | | | | |
| Notification of special compliance requirements | N/A | | | | | | | |
| Notification of initial performance test | 2 | 1 | 2 | 0 | 0 | 0 | 0 | \$0 |
| Notification of compliance status ^d | 2 | 1 | 2 | 0 | 0 | 0 | 0 | \$0 |
| Review of repeat Method 5 performance test report - Pushing (through CEDRI using ERT) | 8 | 2.0 | 16 | 5.6 | 89.6 | 4.48 | 8.96 | \$5,262.39 |
| Review of repeat Method 5, 320, and CARB 429 performance test - Pushing (through CEDRI using ERT) | 24 | 2.0 | 48 | 2.8 | 134.4 | 6.72 | 13.44 | \$7,893.58 |
| Review of repeat Method 29, 5, and 320 performance tests - ByP Battery Combustion Stack (through CEDRI using ERT) | 24 | 2.8 | 67.2 | 1.8 | 120.96 | 6.048 | 12.096 | \$7,104.22 |
| Review of repeat Method 29, 5, 26/26A, and CARB 429 performance tests - HNR HRSG Main Stack (through CEDRI using ERT) | 32 | 1.3 | 41.6 | 0.8 | 33.28 | 1.664 | 3.328 | \$1,954.60 |
| Review of repeat Method 29, 5, 26/26A, | 40 | 10.6 | 424 | 1 | 424 | 21.2 | 42.4 | \$24,902.37 |

| Burden Item | (A) Person hours per occurrence | (B) No. of occurrences per plant per year | (C) Hours per plant per year (AxB) | (D) Plants per year ^a | (E) Technical person- hours per year (CxD) | (F) Management person hours per year (Ex0.05) | (G) Clerical person hours per year (Ex0.1) | Cost Per year |
|---|---------------------------------------|--|---|-------------------------------------|--|---|---|---------------|
| CARB 429 and 316 performance tests - HNR HRSG Bypass/Waste Heat Stack (through CEDRI using ERT) | | | | | | | | |
| Review of semi-annual compliance report i | 8 | 0.4 | 3.2 | 14 | 44.8 | 2.24 | 4.48 | \$2,631.19 |
| Review of NESHAP waiver application | 2 | 1 | 2 | 0 | 0 | 0 | 0 | \$0 |
| Review of quarterly compliance report for battery stacks ^j | 1 | 4 | 4 | 9 | 36 | 1.8 | 3.6 | \$2,114.35 |
| TOTAL ANNUAL COST (rounded) k | | | | | | 1,015 | | \$51,860 |

Assumptions:

- ^a There are an average of 14 respondents (i.e., 9 coke plants operating 27 by-product (ByP) batteries and 5 coke plants operating 20 heat and/or nonrecovery (HNR) batteries). We have assumed that there will be no new sources subject to this regulation.
- 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 \$70.56 (GS-13, Step 5, \$44.10 + 60%), Technical rate of \$52.37 (GS-12, Step 1, \$32.73 + 60%), and Clerical rate of \$28.34 (GS-6, Step 3, \$17.71 + 60%). These rates are from the Office of Personnel Management (OPM) "2022 General Schedule" which excludes locality rates of pay.
- ^c We have assumed that existing sources have complied with the initial rule requirements. New respondents are required to conduct performance test for add-on control equipment, and submit initial notifications.
- ^d Every 2.5 years (or about 0.4 times per year, if averaged over the three-year period of ICR), respondents must sample each pushing emission point using Method 5 for particulate matter and submit a report of results. We have determined that there is an average of 2.0 emission points per respondent (28 pushing units / 14 facilities) that need to be tested. There is an average of 5.6 respondents per year (14*0.4) submitting Method 5 performance test reports.
- ^e We are proposing Hg, AG, HCN, and PAH testing once every five years (or 0.2 times per year over the 3 years of the ICR), each control device applied to pushing emissions must be sampled by Method 29 for Hg; Method 320 for AG and HCN; and CARB 429 for PAH. We have determined that there is an average of 2.0 emission points per respondent (28 pushing units / 14 facilities) that need to be tested. There is an average of 2.8 respondents per year (14*0.2) submitting Method 29, 320, and CARB 429 performance test reports.
- ^f We are proposing Hg, PM, AG and AG testing once every five years (or 0.2 times per year over the 3 years of the ICR), each ByP battery combustion stack must be sampled by Method 29 for Hg, Method 5 for PM, and Method 320 for AG and HCN. We have determined that there is an average of 2.8 emission points per respondent (25 ByP battery combustion stacks / 9 facilities) that need to be tested. There is an average of 1.8 respondents per year (9*0.2) submitting Method 29, 5, and 320 performance test reports.
- ^g We are proposing Hg, PM, AG, and PAH testing once every five years (or 0.2 times per year over the 3 years of the ICR), each HNR heat recovery steam generator (HRSG) main stack must be sampled by Method 26 for Hg, Method 5 for PM, Method 26/26A for AG, and CARB 429 for PAH. We have determined that there is an average of 1.3 emission points per respondent (5 HNR HRSG main stacks / 4 heat recovery facilities) that need to be tested. There is an average of 0.8 respondents per year (4*0.2) submitting Method 29, 5, 26/26A, and CARB 429 performance test reports.
- ^h We are proposing Hg, PM, AG, PAH, and Formaldehyde testing once every five years (or 0.2 times per year over the 3 years of the ICR), each HNR HRSG

| Burden Item | (A) Person hours per occurrence | (B) No. of occurrences per plant per year | (C) Hours per plant per year (AxB) | (D) Plants per year ^a | (E) Technical person- hours per year (CxD) | (F) Management person hours per year (Ex0.05) | (G) Clerical person hours per year (Ex0.1) | (H) Total Cost Per year |
|-------------|---------------------------------------|--|---|-------------------------------------|--|---|---|----------------------------|
|-------------|---------------------------------------|--|---|-------------------------------------|--|---|---|----------------------------|

bypass/waste heat stack must be sampled by Method 29 for Hg, Method 5 for PM, Method 26/26A for AG, CARB 429 for PAH, and Method 316 for Formaldehyde. We have determined that there is an average of 10.6 emission points per respondent (53 HNR HRSG bypass/waste heat stacks / 5 HNR facilities) that need to be tested. There is an average of 1 respondents per year (5*0.2) submitting Method 29, 5, 26/26A, CARB 429 and 316 performance test reports.

ⁱ Sources are required to submit semiannual compliance reports.

^j 40 CFR 63.7341(b) requires the submittal of quarterly compliance reports for the COMS monitoring opacity on the battery stacks at the nine coke plants utilizing by-product recovery ovens.

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