

ICR Summary Information

Hours per Response	29
Number of Respondents	7
Total Estimated Burden Hours	3,520
Total Estimated Costs	\$19,100,000
Annualized Capital O&M	\$18,600,000
Form Number	5900-576

Table 1: Annual Respondent Burden and Cost – NESHAP for Taconite Iron Ore Processing (4

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting Requirements			
A. Familiarization with rule requirements	2	1	2
B. Required activities			
i. Preparation for performance tests - facility labor ^c	40	1	40
ii. Performance tests - contractor costs ^d	.	-	-
iv. SSM Plan	N/A		
C. Create information	N/A		
D. Gather existing information	N/A		
E. Write report			
i. Initial Notifications ^f	2	1	2
ii. Compliance Extension Request ^f	2	1	2
iv. Site-specific Test Plan	40	1	40
v. Operation and Maintenance Plan ^f	40	1	40
vi. Fugitive Dust Emission Control Plan ^f	20	1	20
vii. Site-specific Monitoring Plan	80	1	80
viii. Notification of Special Compliance Requirements ^h	40	0.3	13.3
ix. Notification of Performance Test	4	4.4	17.5
x. Semiannual compliance reports	40	2	80
xi. Report of performance test (through CEDRI using ERT) ^g	8	1	8
Subtotal for Reporting Requirements			
4. Recordkeeping Requirements			
A. Familiarization with rule requirements	See 3A		
B. Plan activities ^f	3	1	3
C. Develop record system ^f	16	1	16
D. Time to Enter Information	2	52	104
E. Time to train personnel ^f	3	1	3
F. Recordkeeping for performance tests	2	4.4	8.7
G. Time for audits	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded) ⁱ			
TOTAL CAPITAL AND O&M COST (rounded) ⁱ			
GRAND TOTAL (rounded) ⁱ			

Assumptions:

^a There are approximately 8 existing sources currently subject to this rule. We estimate there will be no additional new sources subject to this ICR.

^b This ICR uses the following labor rates: Managerial \$172.41 (\$82.10+ 110%); Technical \$141.75 (\$67.50 + 110%); and Department of Labor, Bureau of Labor Statistics, December 2023, "Table 2. Civilian workers by occupational and industry increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employment associated with hiring, training, and equipping their employees.

^c To demonstrate continuous compliance, plants must conduct performance tests every 2.5 years for PM, Hg, HCl and HF of OCH, PH, and dryer must be conducted once every 5 years for an average of approximately 23.4 tests/yr or 3.3 tests/yr contractor, oversee tests, and review test reports.

^d Testing contractor cost are shown as capital costs in the table Capital/Startup vs. Operation and Maintenance (O&M) Costs.

^e Assumes all sources will conduct performance testing for mercury, HCl and HF once every 2.5 years. Includes time to set up tests.

^f These are one-time requirements.

^g Submittal of performance test data through the EPA's CEDRI in ERT format is estimated to require 8 hours annually, in order to minimize emissions.

^h Assumed that 3 plants will submit implementation plans for using emission averaging to comply with proposed mercury emission limits.

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

40 CFR Part 63, Subpart RRRRR) (Renewal)

(D)	(E)	(F)	(G)	(H)
Respondents per year ^a	Technical person- hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Cost Per year ^b
7	14	0.7	1.4	\$2,205
7	280	14.0	28.0	\$44,102
-	-	-	-	-
0	0	0.0	0.0	\$0
0	0	0.0	0.0	\$0
7	280	14.0	28.0	\$44,102
7	280	14.0	28.0	\$44,102
0	0	0.0	0.0	\$0
7	560	28.0	56.0	\$88,204
3	40	2	4	\$6,300
7	122	6	12	\$19,279
7	560	28	56	\$88,204
7	56	3	6	\$8,820
		2,521		\$345,317
7	21	1.05	2.1	\$3,308
2.3	37.3	1.9	3.7	\$5,880
7	728	36.4	72.8	\$114,665
7	21	1.05	2.1	\$3,308
7	61.2	3.1	6.1	\$9,639
		999		\$136,800
		3,520		\$482,000
				\$18,600,000
				\$19,100,000

Labour
Management
Technical
Clerical

Ind. Furnaces and ore c
OCH and PH operation

Hours per response
29

source that will become subject to the rule each year over the 3-year period of

and Clerical \$71.36 (\$33.98 + 110%). These rates are from the United States
Bureau of Economic Analysis, "Total compensation." The rates are
paying workers beyond their wages and benefits, including business expenses

at 18 industrial furnaces or 1.03 tests/year per plant $((18 \times 2/5)/7)$. PM testing
year per plant. Estimate includes 40 hours per facility per year to set up testing

costs.

set up testing contractor, oversee tests, and write test plans.

includes keeping records of failures to meet the standards and the actions taken

to meet emissions standard once over the 3 year period.

or Rates
\$172.41
\$141.75
\$71.36

dryers 53
as 115

Table 2: Average Annual EPA Burden and Cost – Average Annual EPA Burden and Cost – N

Activity	(A)	(B)	(C)	(D)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year ^a
New Respondents ^c				
Notification of compliance status	4	1	4	0
Notification of intent to construct a major source and review application	4	1	4	0
Notification of start of construction	2	1	2	0
Notification of actual startup	2	1	2	0
Notification of initial performance test and test plan	4	1	4	0
Existing Respondents				
Notifications of Performance Tests ^c	4	4.37	17	7
Notification of Special Compliance Requirements ^e	4	1	4	0.33
Review of Performance Test Report for PM, Hg, HCL and HF ^f	8	4.37	35	7
Review of Notification of Compliance Status	2	1	2	7
Review of Semiannual Compliance Report	6	2	12	7
Subtotals Labor Burden and Cost				
TOTAL ANNUAL BURDEN AND COST (rounded)^g				

Assumptions:

^a There are 8 existing sources currently subject to this rule. We expect there will be no additional new source that will be

^b This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%); Tech 3, \$19.30+ 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 per Management (OPM), 2024 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60% employees.

^c No new or reconstructed sources are expected within the next three years.

^d To demonstrate continuous compliance, plants must conduct performance tests every 2.5 years for PM, Hg, HCl and HF testing of OCH, PH, and dryer must be conducted once every 5 years for an average of approximately 23.4 tests/yr or 3.3

^e Assumed that 3 plants will submit implementation plans for using emission averaging to comply with proposed mercury

- f. Assumed that it will take 8 hours to review performance test reports.
- g. Totals have been rounded to three significant figures. Figures may not add together exactly due to rounding.

ESHAP for Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR) (Renewal)

(E)	(F)	(G)	(H)
Technical person- hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
122	6.1	12.2	\$7,834
1	0.1	0.1	\$85
245	12.2	24.5	\$15,669
14	0.7	1.4	\$896
84	4.2	8.4	\$5,376
537			\$29,861
537			\$29,900

Labor Rates	
Management	\$76.91
Technical	\$57.07
Clerical	\$30.88

come subject to the rule each year over the 3-year period of this ICR.

nical \$57.07 (GS-12, Step 1, \$35.67 + 60%); and Clerical \$30.88 (GS-6, Step percent of Technical hours. These rates are from the Office of Personnel percent to account for the benefit packages available to government

IF at 18 indurating furnaces or 1.03 tests/year per plant ((18 x 2/5)/7). PM tests/year per plant.

ry emissions standard once over the 3 year period.

Capital/Startup vs. Operation and Maintenance

(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)
DSI operation and maintenance costs	\$0	0	\$0
ACI/Venturi scrubber operation and maintenance costs	\$0	0	\$0
Records	\$0	0	\$0
Method 5 performance test ^c			\$438,000
Totals (rounded) ^d			\$438,000

^a The estimated cost of this test would be \$17,176 and is required once every 5 years. We assume 20% (3) facilities.

^b This is a one time cost associated with the new regulations. The 15 existing facilities are required to perform Method 5 performance tests. The total cost for these tests is \$270,000. This cost is included in the Method 5 performance test cost.

^c Testing contractor cost is based on the following: (51 indurating furnace Method 5 PM tests, twice/5 yr term @ \$10,000/test) = \$438,000/year.

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

ence (O&M) Costs			
(E)	(F)	(G)	
Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E x F)	
\$242,716	1	\$242,716	
\$3,549,578	5	\$17,747,890	
\$26,472	7	\$185,304	
			Totals
		\$18,200,000	\$18,600,000

ilities will annually perform the Periodic 5-year test.
 1 initial performance testing on vents downstream from the main filter
 m @ \$10,000/test) + (117 OCH, PH, and Ore dryer Method 5 PM tests,

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity ^a	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 applicability	0	1	0	0
Notification of compliance status	0	1	0	0
Notification of intent to construct a major source and review application	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance tests	7	4.4	0	30.6
Operation, maintenance, and monitoring plans	7	1	0	7
Site-specific monitoring plan	7	1	0	7
Site-specific test plan	7	4.4	0	30.6
Notification of special compliance requirements	3	0.3	0	1
Semiannual compliance report	7	2	0	14
Report of performance test	7	4.4	0	30.6
			Total (rounded)	121

^a Notifications and semiannual reports submitted through CEDRI. Report of performance test/retest submitted through ERT.

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
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
1	0	7	0	0
2	0	7	0	0
3	0	7	0	0
Average	0	7	0	0

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

(E)
Number of Respondents (E=A+B+C-D)
7
7
7
7