

### **ICR Summary Information**

Hours Per Response	33
Number of Respondents	9
Total Estimated Burden Hours	362
Total Estimated Costs	\$49,600
Annualized Capital O&M	Not Applicable
Form Number	Not Applicable

**Table 1. Annual Respondent Burden and Cost - NESHAP for Ferroalloys Production Area Source**

<b>Burden item</b>	<b>(A) Person-hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>	<b>(C) Person-hours per respondent (A x B)</b>	<b>(D) Respondents per year<sup>a</sup></b>
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Acquisition, Installation, & Utilization of Tech. & Systems <sup>b</sup>	40	1	40	0
4. Reporting Requirements				
A. Familiarize with regulatory requirements <sup>c</sup>	4	1	4	9
B. Required Activities				
One-time activity, Initial control device Method 22 Planning	N/A			
One-time activity, Initial control device Method 22 Test	N/A			
Periodic control device Method 22 <sup>d</sup>	2	2	4	18
Retest control device <sup>d</sup>	2	1	2	1
Weekly VE check <sup>d</sup>	0.1	52	5.2	18
One-time activity, initial building opacity Method 9 <sup>e</sup>	N/A			
Periodic (semi-annual) building VE Method 22 <sup>d</sup>	2	2	4	9
Retest building opacity Method 9 <sup>e</sup>	N/A			
C. Create information	See 4B			
D. Gather existing information	See 4B			
E. Write Report	See 4B			
Initial Notification <sup>b</sup>	2	1	2	0
Notification of Compliance Status <sup>b</sup>	4	1	4	0
Annual Compliance Certification <sup>f</sup>	4	1	4	9
Report of Exceedances <sup>g</sup>	2	1	2	2
<b>Subtotal for Reporting Requirements</b>				
5. Recordkeeping Requirements				
A. Familiarize with regulatory requirements	See 4A			
B. Plan activities	See 5E			
C. Implement activities	See 5E			
D. Develop record system	See 5E			
E. Time to enter information				
Records of all info. required by standards <sup>h</sup>	0.3	12	3.6	9
F. Time to train personnel	N/A			
G. Time to adjust existing ways to comply w/ prev. appl. req.	N/A			
H. Time to transmit or disclose information <sup>i</sup>	0.3	1	0.3	9

I. Time for audits	N/A			
<b>Subtotal for Recordkeeping Requirements</b>				
<b>Total Labor Burden and Costs (rounded) <sup>j</sup></b>				
<b>Total Capital and O&amp;M Cost (rounded) <sup>j</sup></b>				
<b>GRAND TOTAL (rounded) <sup>j</sup></b>				

**Assumptions:**

<sup>a</sup> 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 employer associated with hiring, training, and equipping their employees.

<sup>b</sup> This is a one-time activity and there are no new sources anticipated to become subject to the standard during this ICR renewal.

<sup>c</sup> We have assumed that there are approximately 9 existing sources that are subject to the standard, with no new facilities per regulatory requirements each year.

<sup>d</sup> We have estimated 18 control devices requiring Method 22 testing and visual emission inspection at the 9 existing sources. On building-wide testing, it is assumed that each of the 9 existing sources has one building per source and that all buildings

<sup>e</sup> One-time activity. Assume the facilities hire a contractor.

<sup>f</sup> The 9 existing plants would be required to submit an Annual Compliance Certification each year.

<sup>g</sup> Assumes that 2 facilities per year would have to submit a report of exceedance.

<sup>h</sup> Recordkeeping requirements cover all existing plants.

<sup>i</sup> Transmittals would include Annual Compliance Certifications for 9 plants.

<sup>j</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ces (40 CFR Part 63, Subpart YYYYYY) (Renewal)

(E) Technical person-hour per year (C x D)	(F) Management person-hour per year (E x 0.05)	(G) Clerical person- hour per year (E x 0.10)	(H) Total Cost per year
0	0	0	\$0
36	1.8	3.6	\$5,670.23
72	3.6	7.2	\$11,340.47
2	0.1	0.2	\$315.01
93.6	4.68	9.36	\$14,742.61

Labor Rates	
Management	\$172.41
Technical	\$141.75
Clerical	\$71.36

36	1.8	3.6	\$5,670.23
0	0	0	\$0
0	0	0	\$0
36	1.8	3.6	\$5,670.23
4	0.2	0.4	\$630.03
<b>322</b>			<b>\$44,039</b>
32.4	1.62	3.24	\$5,103.21
2.7	0.135	0.27	\$425.27

		<b>40</b>	<b>\$5,528</b>
		<b>362</b>	<b>\$49,600</b>
			<b>\$0</b>
			<b>\$49,600</b>

Clerical \$71.36 (\$33.98 + 110%). These rates are from the United States group.” The rates are from column 1, “Total compensation.” The rates are for workers beyond their wages and benefits, including business expenses

evaluation period.

per year. We assume that each respondent will have to familiarize with the

s. It is also assumed that one of these control devices will require a re-test. ; will require a re-test.

hr/response

**Table 2: Annual Agency Burden and Cost -NESHAP for Ferroalloys Production Area Sources (Renewal)**

Activity	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent (A x B)	(D) Respondents per year
Report Review:				
Initial Notification of applicability <sup>b</sup>	1	1	1	0
Notification of Compliance Status <sup>c</sup>	2	1	2	0
Annual Compliance Certification <sup>d</sup>	2	1	2	9
Annual Report of Deviations <sup>e</sup>	2	1	2	2
<b>TOTAL (rounded) <sup>f</sup></b>				

**Assumptions:**

<sup>a</sup> This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%); Tech Clerical \$30.88 (GS-6, Step 3, \$19.30+ 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, These rates are from the Office of Personnel Management (OPM), 2024 General Schedule, which excludes locality, rates account for the benefit packages available to government employees.

<sup>b</sup> This is a one-time requirement. All 9 plants have already submitted initial notification during the initial compliance per

<sup>c</sup> This is a one-time requirement. All 9 plants have submitted the notification of compliance status during the initial comp

<sup>d</sup> All 9 plants will submit an annual compliance certification each year.

<sup>e</sup> Assumes that 2 facilities per year would have to submit an exceedance report per year.

<sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**(40 CFR Part 63, Subpart YYYYYY)**

<b>(E) Technical person-hours (C x D)</b>	<b>(F) Managerial person-hours (E x 0.05)</b>	<b>(G) Clerical person-hours (E x 0.10)</b>	<b>(H) Cost, \$<sup>a</sup></b>
0	0	0	\$0
0	0	0	\$0
18	1	1.8	\$1,152.06
4	0.2	0.4	\$256.01
<b>25</b>			<b>\$1,410</b>

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

Technical \$57.07 (GS-12, Step 1, \$35.67 + 60%); and  
 Managerial and Clerical hours are 10 percent of Technical hours.  
 of pay. The rates have been increased by 60 percent to

period.  
 compliance period.



## **Estimating Capital/Startup and Operation and Maintenance Costs**

The only costs to the regulated industry resulting from information collection activities required by the subject standards are labor costs. There are no capital/startup or operation and maintenance costs.

<b>Total Annual Responses</b>				
(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 $E=(B \times C)+D$
One-time initial notification	0	1	0	0
One-time notifications of compliance status	0	1	0	0
Annual compliance certifications	9	1	0	9
Annual reports of exceedances	2	1	0	2
<b>TOTAL</b>				<b>11</b>

<b>Number of Respondents</b>			
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports
	(A)	(B)	(C)
Year	Number of New Respondents <sup>a</sup>	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports
1	0	9	0
2	0	9	0
3	0	9	0
<b>Average</b>	<b>0</b>	<b>9</b>	<b>0</b>

<sup>a</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

(D)	(E)
Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
0	9
0	9
0	9
<b>0</b>	<b>9</b>