U.S. Environmental Protection Agency
Information Collection Request

Title: NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (40 CFR Part 63, Subpart XXX) (Renewal)

OMB Control Number: 2060-0391

EPA ICR Number: 1831.09

Abstract: The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Ferroalloys Production: Ferromanganese and Silicomanganese (40 CFR Part 63, Subpart XXX) were promulgated on May 20, 1999; and amended on: March 22, 2001; June 23, 2003; April 20, 2006; June 30, 2015 (80 FR 37366); January 18, 2017 (82 FR 5408), and November 19, 2020 (85 FR 73902). These regulations apply to both new and existing ferroalloy production facilities that manufacture ferromanganese and silicomanganese, and that are either major sources of hazardous air pollutant (HAP) emissions or are co-located at major sources of HAPs. The following affected facilities at ferroalloy production plants are subject to this NESHAP rule: electric arc furnaces; casting operations; metal oxygen refining (MOR) processes; crushing and screening operations; and outdoor fugitive dust sources. New facilities include those that commenced construction or reconstruction after the date of proposal. The burden in this ICR reflects the burden associated with the recordkeeping and reporting requirements of the regulation for new and existing sources included in the June 30, 2015 Risk and Technology Review (RTR) final rule amendments and January 18, 2017 reconsideration notice. The burden associated with the 2015 final rule amendments and reconsideration notice is accounted for in EPA ICR No. 2448.02 (OMB Control No. 2060-0676). The 2020 amendment implemented the plain language reading of the “major source” and “area source” definitions of section 112 of the Clean Air Act (CAA) and provide that a major source can be reclassified to area source status at any time upon reducing its potential to emit (PTE) hazardous air pollutants (HAP) to below the major source thresholds and required this notification be submitted electronically. This information is being collected to assure compliance with 40 CFR Part 63, Subpart XXX.

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.

Over the next three years, approximately two respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

The Office of Management and Budget (OMB) approved the currently-active ICR with the following “Terms of Clearance”:

> "In accordance with 5 CFR 1320, the information collection is approved for three years. As terms of clearance, upon renewal of this collection, EPA is required to include the following in its supporting statement for this and other NESHAP ICRs: (1) a description of the regulatory text applicable to the ICR including submission specifications; (2) a clear description of the data elements being collected under the ICR; (3) screen shots of the electronic portal where the reporting requirements are submitted to EPA (with the control number and burden statement); (4) a detailed discussion of how information is submitted and the extent to which electronic reporting is available; (5) evidence of consultation with respondents (by actively reaching out to stakeholders as permitted by the PRA) to ensure the supporting statement's accuracy on availability of data, frequency of collection, clarity of instructions, accuracy of burden estimate, relevance of data elements, and similar PRA matters; and (6) discussion of how EPA addressed substantive concerns raised by respondents and other stakeholders during consultation and in response to comments received on FR notices. In addition, please convert the supporting statement to the standard 18 question SS-A format upon renewal."

The relevant regulatory text is referenced in section 12(b) of this document. We have created a supplementary document including the regulatory text that describes the ICR requirements as identified in section 12(b) of this document as requested. All electronic collection in this information collection is submitted through EPA's CEDRI, as discussed in section 3 of this document. Additional Paperwork Reduction Act requirements for CEDRI, including the burden statement and OMB control number, are available at: https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert. We have created supplementary documents that include screenshots of the electronic portal where the reporting requirements are submitted online to EPA, including the OMB burden statement on the electronic portal. A description of the EPA's consultation with respondents and how EPA responded to any concerns raised by respondents or other stakeholders is discussed in section 8 of this document. Per the Terms of Clearance on the previous ICR, this supporting statement follows the standard 18-question format.

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); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in

accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from ferroalloy production facilities 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 XXX.

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 in order to determine an affected facility's initial capability to comply with these emission standards. Continuous emission monitors are used to ensure compliance with these standards 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 either the Agency or its 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 that these standards are being met. The performance test may also be observed.

The required quarterly, semiannual, and annual 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.

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.

The rule was amended to include electronic reporting provisions on June 30, 2015. Respondents are required to use the EPA's Electronic Reporting Tool (ERT) to develop performance test reports and performance evaluation reports and submit them through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/). The ERT is an application rather than a form, and the requirement to use the ERT

is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. The EPA is also requiring that owners or operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b) (when required under 40 CFR 63.9(b)(ii)), and change in information already provided required by 40 CFR 63.9(j) through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For the notifications required in 40 CFR 63.9(b) (when required under 40 CFR 63.9(b)(ii)) and 63.9(j), owners and operators would be required to upload a PDF of the required notifications. For the purposes of this ICR, it is assumed that there is no additional burden associated with the requirement for respondents to submit the notifications and reports electronically. The supplemental files to this ICR renewal contain screenshots showing the CDX homepage for CEDRI login, the CEDRI PRA screen, the CEDRI interface for managing reports for various subparts, and the landing page of the ERT that shows the link to PRA information.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert.

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.

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, 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 the delegated state or local agency. If a state or local agency has adopted its own 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

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

The NESHAP for ferroalloys production facilities only applies to major sources. There are no small entities (i.e., small businesses) affected by this regulation. In addition, during the rule development process, the EPA closely reviewed existing permit conditions at existing facilities, and, where feasible, incorporated similar, if not identical, requirements in the final rule. The Agency considers these to be the minimum requirements needed to ensure compliance with these standards and, therefore, cannot reduce them further for small entities.

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 the 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 reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

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 the 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.

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.

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (89 FR 63933) on August 6, 2024. No comments were received on the burden published in the Federal Register for this renewal.

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.

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately six respondents will be subject to the standard over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Iron and Steel Institute at 202-452-7100, and the Association for Iron & Steel Technology at 724-814-3000. In this case, no comments were received.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

9. PAYMENTS OR GIFTS TO RESPONDENTS

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

No payments or gifts are made to respondents.

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 (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 the standard 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 new and existing ferroalloys production facilities that are major sources or are co-located at major sources. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3313 (Electrometallurgical Products, except Steel) which corresponds to the North American Industry Classification System (NAICS) 331110 for Iron and Steel Mills and Ferroalloy Manufacturing (which includes Ferromanganese Manufacturing, Ferrosilicon Manufacturing, and Silicomanganese Ferroalloys Manufacturing).

Based on our research for this ICR, on average over the next three years, approximately two existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject, for an overall total of two respondents per year. The number of respondents is calculated using the table Number of Respondents that addresses the three years covered by this ICR. None of the facilities in the United States are owned by either state, local, or tribal entities or by the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries. Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

The total number of annual responses per year is calculated using the table Total Annual Responses shown below. The number of Total Annual Responses is 19.

12b. Information Requested

In this ICR, all the data that are recorded or reported is required by the NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (40 CFR Part 63, Subpart XXX). Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least five years following the date of such measurements, maintenance reports, and records.

A source must make the following reports:

Notifications	
Notification of applicability if an area source becomes subject to the rule	§63.9(b)(1), §63.1627(a)
Notification of construction/reconstruction	§§63.9(b)(4)-(5),

Notifications	
	§63.1627(a)
Notification of performance test	§63.9(e), §63.1627(a)
Notification of opacity and visible emission observations	§63.9(f), §63.1627(a)
Notification of compliance status	§63.9(h), §63.1627(a)
Notification of reclassification to area source status or to revert to major source status (electronic submission)	§63.9(b)
Notification of change in information already provided (electronic submission)	§63.9(j)

Reports	
Results of performance tests (electronic submission)	§63.10(d)(2), §63.1628(c), §63.1628(e)(1)(i)(A)
Results of opacity or visible emission observations	§63.10(d)(3), §63.1628(c)
Deviations from process fugitive emissions ventilation plan	§63.1628(d)(1)
Deviations from outdoor fugitive dust control plan	§63.1628(d)(1)
Deviations from standard operating procedures manual for baghouses	§63.1628(d)(1)
Deviations from established parameters for pressure drop and flow rate in scrubbers controlling PM	§63.1628(d)(2)
Alarms and actions taken in response to bag leak detection system	§63.1628(d)(3)
Shop building capture system monitoring and deviations	§63.1628(d)(4)
Results of quarterly inspections of the furnace capture system	§63.1628(d)(5)
Malfunctions and exceedances	§63.1628(d)(7)
Annual compliance certification	§63.1628(e)

A source must keep the following records:

Recordkeeping	
Maintain records of all information for five years	§63.10(b)(1), §63.1628(a)
Maintain records of all required maintenance performed on the air pollution control and monitoring equipment	§63.10(b)(2)(iii), §63.1628(a)
Bag leak detection system: output, alarms, corrective actions	§§63.1628(b)(1)-(2)
Baghouses without leak detection systems: inspection and maintenance records	§63.1628(b)(3)
Wet scrubbers: pressure drop, water flow rate, deviations, corrective actions	§63.1628(b)(4), §63.1628(b)(7)
Shop building capture system: monitoring, deviations, corrective actions	§63.1628(b)(5)
Inspections of the furnace capture system (quarterly)	§63.1628(b)(6)
Records of startup and/or shutdown.	§63.1628(b)(9)
Records of malfunctions and exceedances	§63.1628(b)(10)
Deviations from process fugitive emissions ventilation plan	§63.1628(b)(11)
Deviations from outdoor fugitive dust control plan	§63.1628(b)(11)
Deviations from monitoring SOP manual for baghouses	§63.1628(b)(11)
Records of performance tests	§63.1628(a), §§63.10(b)(2)(viii), (ix)
Records of opacity and visible emission observations	§63.10(b)(2)(viii)

12c. Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Monitor shop opacity.
Monitor baghouse operations on a regular basis (e.g., observe on a daily basis for the presence of visible emissions at baghouses and bag leak detection system). Conduct periodic visual inspections to ensure systems are working properly.
Monitor pressure drop and liquid supply pressure across the venturi scrubber.
Perform initial performance test and repeat performance test, if necessary. Reference Method 9 for opacity observations and Method 5 for determination of particulate matter concentrations and volumetric flow rates for baghouses without stacks.
Write the notifications and reports listed above.
Enter information required to be recorded above.
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.

12d. Respondent Burden Hours and Labor Costs

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 1,610 hours (Total Labor Hours from Table 1). 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	$172.41 ($82.10 + 110%)
Technical	$141.75 ($67.50 + 110%)
Clerical	$71.36 ($33.98 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2023, "Table 2. Civilian workers by occupational and industry group." The rates are from column 1, "Total compensation." The rates are increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their 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.

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.

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 standard(s) 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 this regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

The total capital/startup costs for this ICR are $0. This is the total of column D shown below in the table Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The total operation and maintenance (O&M) costs for this ICR are $424,000. This is the total of column G shown below in the table Capital/Startup vs. Operation and Maintenance (O&M) Costs.

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 $424,000.

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

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

- 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.

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 standard, 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. 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.

14b. Agency Labor Cost

The 'burden' to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors. The only costs to the Agency are those costs associated with analysis of the reported information. The 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 burden and cost during the three years of the ICR is estimated to be 72 hours at a cost of $4,010. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (40 CFR Part 63, Subpart XXX) (Renewal).

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

Managerial	$76.91 (GS-13, Step 5, $48.07 + 60%)
Technical	$57.07 (GS-12, Step 1, $35.67 + 60%)
Clerical	$30.88 (GS-6, Step 3, $19.30+ 60%)

These rates are from the Office of Personnel Management (OPM), 2024 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. Details upon which this estimate is based appear at the end of this document in Table 2: Average Annual EPA Burden and Cost –NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (40 CFR Part 63, Subpart XXX) (Renewal).

14c. Agency Non-Labor Costs

There are no non-labor costs to the Agency associated with this information collection.

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.

There is no change in the labor hours in this ICR compared to the previous ICR. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden. There is a slight increase in labor costs, which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most recent Bureau of Labor Statistics report (December 2023) to calculate respondent burden costs. Since there are no changes in the regulatory requirements and there is no significant industry growth, there are also no changes in the capital/startup or operation and maintenance (O&M) costs.

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.

All non-CBI data submitted electronically to the Agency through CEDRI are available to the public for review and printing and are accessible using WebFIRE. Electronically submitted emissions data from performance testing or performance evaluations using the Electronic Reporting Tool or templates attached to CEDRI, as well as data from reports from regulations with electronic templates, are tabulated; data submitted as portable document format (PDF) files attached to CEDRI are neither tabulated nor subject to complex analytical techniques. Electronically submitted emissions data used to develop emissions factors undergo complex analytical techniques and the draft emissions factors are available on the Clearinghouse for Inventories and Emission Factors listserv at https://www.epa.gov/chief/chief-listserv for public review and printing. Electronically submitted emissions data, as well as other data, obtained from one-time or sporadic information collection requests often undergo complex analytical techniques; results of those activities are included in individual rulemaking dockets and are available at https://www.regulations.gov/ for public review and printing.

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.

EPA will display the expiration date for OMB approval of the information collection.

18) CERTIFICATION STATEMENT

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

There are no exceptions to the topics of the certification statement.

Table 1: Annual Respondent Burden and Cost – NESHAP for Ferroalloys Production: Ferromanganese and Silicomanganese (40 CFR Part 63, Subpart XXX) (Renewal)

Burden Item	(A) Person-hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (F=Ex0.05)	(G) Clerical person-hours per year (G=Ex0.1)	(H) Cost ($) [b]
1. Reporting Requirements								
A. Familiarize with Regulatory Requirements	4	1	4	2	8	0.4	0.8	$1,260.05
B. Required activities								
a. Initial performance test (PM, HCl, Hg, PAH, Formaldehyde) - Furnace, capture systems - Fabric Filter [c]	15	3	45	0	0	0	0	$0.00
b. Initial performance test (PM, HCl, Hg, PAH, Formaldehyde) - Furnace, capture systems - Scrubber [c]	15	2	30	0	0	0	0	$0.00
c. Initial performance test (PM) - Local ventilation, Metal Oxygen Refining (MOR) process, crushing and screening [d]	20	4	80	0	0	0	0	$0.00
d. Periodic performance tests for submerged arc furnace control devices								
i. Annual wet scrubber PM tests (furnace) [e]	15	2.5	37.5	2	75	3.75	7.5	$11,812.99
ii. Annual Hg tests for wet scrubber, fabric filter, and vent stacks [e] (furnace)					0	0	0	$0.00
iii. Annual PAH tests for wet scrubber, fabric filter, and vent stacks (ferromanganese furnaces) [e,f]					0	0	0	$0.00
iv. PM tests for fabric filters every five years (furnace) [g]	15	0.5	7.5	2	15	1	2	$2,362.60
v. HCl test every five years (furnace) [g]					0	0	0.0	$0.00
vi. Formaldehyde test every five years					0.0	0	0.00	$0.00

(furnace) [g]								
vii. Capture system test every five years (furnace) [g]					0	0	0	$0.00
viii. Local ventilation test every five years [g]	20	0.5	10	2	20	1	2	$3,150.13
ix. MOR process test every five years [g]					0	0	0	$0.00
x. Crushing and screening equipment test every five years [g]					0	0	0	$0.00
e. Non-furnace baghouse observations and inspections [h]					0	0	0	$0.00
i. Daily visible emissions observations	0.5	350	175	2	350	17.5	35	$55,127.28
ii. Weekly confirmation of dust removal	0.1	50	5	2	10	0.5	1	$1,575.07
iii. Monthly check of bag cleaning mechanisms	0.1	12	1.2	2	2	0.12	0	$378.02
iv. Quarterly baghouse integrity checks	0.1	4	0.4	2	1	0.04	0	$126.01
v. Semiannual baghouse inspections	0.1	2	0.2	2	0	0.02	0	$63.00
f. Furnace baghouse bag leak detection system (annual O&M) [i]	4	2	8	2	16	0.8	2	$2,520.10
g. Pressure drop/liquid flow rate CPMS-scrubber (annual O&M) [j]	2	1	2	1	2	0.1	0	$315.01
h. Weekly Method 9 (Opacity) [k]	2	156	312	2	624	31.2	62	$98,284.06
i. Ductwork flowrate monitoring (annual O&M) [l]	2	1	2	2	4	0.2	0	$630.03
j. Furnace capture system inspection (Quarterly) [m]	2	4	8	2	16	0.8	2	$2,520.10
C. Create information	See 1B				0	0	0	$0.00
D. Gather information	See 1B				0	0	0	$0.00
E. Report preparation					0	0	0	$0.00
a. Initial Notifications	N/A				0	0	0	$0.00
b. Notification of construction/reconstruction	N/A				0	0	0	$0.00
c. Notification of compliance status	4	1	4	0	0	0	0	$0.00
d. Notification of performance test	2	1	2	2	4	0.2	0	$630.03
e. Notification of opacity observations	2	1	2	2	4	0.2	0	$630.03
f. Notification of change in information already provided [n]	2	0.33	0.66	2	1	0.066	0	$207.91

g. Report of performance tests, opacity observations	5	1	5	2	10	0.5	1	$1,575.07
h. Process fugitive emissions ventilation plan					0	0	0	$0.00
i. Develop and submit plan [o]	80	1	80	0	0	0	0	$0.00
ii. Report deviations from plan [p]	See 1.E.o				0	0	0	$0.00
iii. Update plan [q]	See 1.E.o				0	0	0	$0.00
i. Outdoor fugitive dust control plan					0	0	0	$0.00
i. Develop and submit plan [o]	10	1	10	0	0	0	0	$0.00
ii. Report deviations from plan [p]	See 1.E.o				0	0	0	$0.00
j. Bag leak detection system					0	0	0	$0.00
i. Develop plan [o]	20	1	20	0	0	0	0	$0.00
ii. Report alarms and actions taken in response [p]	See 1.E.o				0	0	0	$0.00
k. Monitoring SOP manual for baghouses controlling process vents, process fugitive, or outdoor fugitive dust					0	0	0	$0.00
i. Develop and submit manual [o]	10	1	10	0	0	0	0	$0.00
ii. Report deviations from plan [p]	See 1.E.o				0	0	0	$0.00
l. Report deviations from established parameters for pressure drop and flow rate in scrubbers controlling PM	See 1.E.o				0	0	0	$0.00
m. Report shop building capture system monitoring and deviations [p]	See 1.E.o				0	0	0	$0.00
n. Reports of the results of quarterly inspections of the furnace capture system	4	4	16	2	32	1.6	3	$5,040.21
o. Reports of deviations, alarms, actions taken, malfunctions, and exceedances [p,r]	10	1	10	2	20	1	2	$3,150.13
p. Annual compliance certification [s]	10	1	10	2	20	1	2	$3,150.13
Subtotal for Reporting Requirements					**1,420**			**$194,508**
2. Recordkeeping Requirements								
A. Familiarize with Regulatory Requirements	See 1A							
B. Implement activities	See 1B							
C. Develop record system	NA							

E. Records of information required by standards								
a. Bag leak detection system: output, alarms, corrective actions	1	1	1	2	2	0.1	0.2	$315.01
b. Baghouses without leak detection systems: inspection and maintenance records	2	20	40	2	80	4	8	$12,600.52
c. Wet scrubbers: pressure drop, water flow rate, deviations, corrective actions	2	1	2	1	2	0.1	0.2	$315.01
d. Shop building capture system: monitoring, deviations, corrective actions	2	1	2	2	4	0.2	0.4	$630.03
e. Inspections of the furnace capture system (quarterly)	2	4	8	2	16	0.8	1.6	$2,520.10
f. Records of startup and/or shutdown.	1	1	1	2	2	0.1	0.2	$315.01
g. Records of malfunctions and exceedances	2	1	2	2	4	0.2	0.4	$630.03
h. Deviations from process fugitive emissions ventilation plan	1	1	1	2	2	0.1	0.2	$315.01
i. Deviations from outdoor fugitive dust control plan	1	1	1	2	2	0.1	0.2	$315.01
j. Deviations from monitoring SOP manual for baghouses	1	1	1	2	2	0.1	0.2	$315.01
k. Records of performance tests	2	2.5	5	2	10	0.5	1	$1,575.07
F. Personnel training	20	1	20	2	40	2	4	$6,300.26
G. Time for audits	NA							
Subtotal for Recordkeeping Requirements					**191**			**$26,146**
TOTAL LABOR BURDEN AND COST (rounded) [t]					**1,610**			**$221,000**
TOTAL CAPITAL AND O&M COSTS (rounded) [t]								**$424,000**
GRAND TOTAL (rounded) [t]								**$645,000**

Assumptions:

[a] There are two ferroalloy production facilities currently subject to the standard. We assume no additional respondents will become subject to this regulation in the three-year period of this ICR.

[b] This ICR uses the following labor rates: Managerial $172.41 ($82.10+ 110%); Technical $141.75 ($67.50 + 110%); and Clerical $71.36 ($33.98 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2023, "Table 2. Civilian workers by occupational and industry group." The rates are from column 1, "Total compensation." The rates are increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and

equipping their employees.

[c] There are a total of six operating furnaces at these two sources. Four furnaces are controlled with fabric filters and two furnaces are controlled with a single venturi scrubber. The fabric filter baghouses controlling the arc furnaces are required to have bag leak detection systems.

[d] There are a total of seven local ventilation, MOR process, and crushing/screening operations controlled by baghouses at these two sources.

[e] There are six operating furnaces at these two sources controlled by five control devices (four fabric filters and one scrubber (5/2=2.5)). Each furnace is tested annually.

[f] We assume that all six ferromanganese furnaces have demonstrated compliance with the PAH standard in four consecutive tests and have petitioned the operating authority to reduce testing frequency to an annual basis.

[g] This testing is done every five years. We assume these tests will be done simultaneously with the annual test. This row calculates the average cost per year over five years (five furnace control systems will be tested at two sources every five years). At these two sources, there are a total of three shop buildings (local ventilation), one MOR process, and three crushing/screening operations, each controlled by baghouses.

[h] Each source has non-furnace operations (crushing and screening, MOR process, building ventilation) that are controlled by baghouses. These observations, inspections, and maintenance get performed on the schedule shown.

[i] At the two sources, there are a total of four arc furnaces each controlled by a single baghouse. These baghouses use bag leak detection systems.

[j] One source operates a scrubber controlling two arc furnaces.

[k] We assume each respondent will perform weekly opacity readings on three non-furnace facilities. (3 x 52 = 156)

[l] The ductwork flowrate monitoring is for determining compliance with the shop building opacity standard at 40 CFR 63.1623 and 63.1626(h).

[m] The capture systems collecting emissions from the six arc furnaces are inspected for proper functioning annually.

[n] We assume sources will make changes to information previously reported once every three years.

[o] These plans and manuals were developed and submitted during the first year after the most recent amendments were promulgated.

[p] We assume that both respondents will report deviations from these plans and parameters each year during the three-year period of this ICR.

[q] Respondents are required to update the process fugitive emissions ventilation plan every 5 years.

[r] We assume that 2 respondents per year will need to submit a Report of Exceedance.

[s] Each respondent is required to submit an Annual Compliance Certification each year.

[t] 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 Ferroalloys Production: Ferromanganese and Silicomanganese (40 CFR Part 63, Subpart XXX) (Renewal)

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant-year (C=AxB)	(D) Plants per year [a]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (F=Ex0.05)	(G) Clerical person-hours per year (G=Ex0.1)	(H) Cost ($) [b]
Report reviews								
Notification of performance test	1	1	1	2	2	0.1	0.2	$128.01
Notification of opacity observations	1	1	1	2	2	0.1	0.2	$128.01
Notification of change in information already provided	1	0.33	0.3	2	1	0.03	0.1	$42.24
Report of performance tests, opacity observations	5	1	5	2	10	0.5	1	$640.06
Reports of the results of quarterly inspections of the furnace capture system	2	4	8	2	16	0.8	1.6	$1,024.09
Reports of deviations, alarms, actions taken, malfunctions, and exceedances	14	1	14	2	28	1.4	2.8	$1,792.16
Annual compliance certification	2	1	2	2	4	0.2	0.4	$256.02
TOTAL (rounded) [i]					**72**			**$4,010**

Assumptions:

[a] There are two ferroalloy production facilities currently subject to the standard. We assume no additional respondents will become subject to this regulation in the three-year period of this ICR.

[b] This cost is based on the average hourly labor rate as follows: Managerial $76.91 (GS-13, Step 5, $48.07 + 60%); Technical $57.07 (GS-12, Step 1, $35.67 + 60%); and Clerical $30.88 (GS-6, Step 3, $19.30+ 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2024 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.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents [1]	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	0	2	0	0	2
2	0	2	0	0	2
3	0	2	0	0	2
Average	0	2	0	0	2

[1] New respondents include sources with constructed, reconstructed and modified affected facilities.

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
Initial Notifications	0	0	0	0
Notification of construction/reconstruction	0	0	0	0
Notification of compliance status	0	1	0	0
Notification of performance test	2	1	0	2
Notification of opacity observations	2	1	0	2
Notification of change in information already provided	2	0.33	0	0.66
Report of performance tests, opacity observations	2	1	0	2
Reports of the results of quarterly inspections of the furnace capture system	2	4	0	8
Report of deviations, alarms, actions taken, malfunctions, and exceedances	2	1	0	2
Annual compliance certification	2	1	0	2
		Total (rounded)		**19**

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/ Startup Cost for One Respondent	Number of New Respondents	Total Capital/Start up Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E x F)
Initial Compliance test (PM, HCl, Hg, PAH, Formaldehyde) - Furnace PP FF	$200,000	0	$0			
Initial Compliance test (PM, HCl, Hg, PAH, Formaldehyde) - Furnace NP FF/Scrubber	$52,000	0	$0			
Initial Compliance test (PM) Building Ventilation/#12 casting/misc. sources NP/FF	$5,000	0	$0			
Pressure Drop/Liquid Flow Rate CPMS - Scrubber [a]	$50,000	0	$0	$18,000	1	$18,000
Bag Leak Detection System [b]	$269,148	0	$0	$109,539	2	$219,078
Ductwork Flow Rate Monitoring [c]	$41,400	0	$0	$2,070	2	$4,140
Annual furnace control device tests: PM, Hg, PAH [d]				$5,000	5	$25,000
Five-year furnace control device tests: HCl, formaldehyde, capture system [e]				$126,000	1.2	$151,200
Five-year local ventilation test [f]				$5,000	0.6	$3,000
Five-year crushing and screening equipment test [g]				$5,000	0.6	$3,000
Five-year metal oxygen refining (MOR) process test [h]				$5,000	0.2	$1,000
Totals (rounded) [i]			$0			$424,000

Assumptions:

[a] One respondent uses a single venturi scrubber to control emissions from two furnaces.

[b] Four furnaces are each controlled with fabric filters and are equipped with bag leak detection systems (BLDS).

[c] There are five furnace capture systems that require quarterly examinations of the ductwork to insure proper operation.

[d] The control devices on furnaces are tested annually. A wet scrubber is tested for PM, Hg, and PAH, while fabric filters are tested for Hg and PAH. We assume that respondents operating ferromanganese furnaces have applied for and received permission to test for PAH on a yearly basis.

[e] The control devices on furnaces are required to be tested for HCl, formaldehyde, and their capture system every five years. This is a repeat of the initial performance testing that cost a total of $756,000 for 6 furnace tests, or an average of $126,000 per test. (See Table 2 of ICR 2448.02.) The cost shown is the five-year average. (6 furnaces/5 years = 1.2 per year)

[f] The shop building ventilation systems controlled by baghouses require testing every five years. There are a total of three shop buildings that require testing. Testing costs are taken from Table 2 Year 2 of ICR 2448.02 for initial testing for 'Initial Compliance test (PM) - Bldg. Vent./#12 casting/misc. sources NP FF'. The cost shown is the five-year average. (3 systems/5 years = 0.6/year)

[g] The crushing/screening operations controlled by baghouses require testing every five years. There are a total of three crushing/screening operations that require testing. Testing costs are taken from Table 2 Year 2 of ICR 2448.02 for initial testing for 'Initial Compliance test (PM) - Bldg. Vent./#12 casting/misc. sources NP FF'. The cost shown is the five-year average. (3 operations/5 years = 0.6/year)

[h] Only one respondent has a metal oxygen refining (MOR) process. This will be tested every five years. Testing costs are taken from Table 2 Year 2 of ICR 2448.02 for initial testing for 'Initial Compliance test (PM) - Bldg. Vent./#12 casting/misc. sources NP FF'. The cost shown is the five-year average. (1 MOR process/5 years = 0.2/year)

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