ICR Summary Information

Hours Per Response	117
Number of Respondents	100
Total Estimated Burden Hours	35,000
Total Estimated Costs	$4,800,000
Annualized Capital O&M	$14,700
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NESHAP for Steel Pickling, HCl Process Facilities and H

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]
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting requirements				
A. Familiarization with regulatory requirements	1	1	1	100
B. Required activities				
Initial performance test [c]	125	1	125	0
Repeat initial performance test [c]	125	0.2	25	0
Periodic performance tests [d, e]	125	1	125	100
Operation and maintenance plan	40	1	40	0
Operation and maintenance plan revision [f]	20	1	20	10
C. Create information	See 3B			
D. Gather existing information	See 3B			
E. Write Report				
Notification of applicability [g]	2	1	2	0
Notification of construction/reconstruction [g]	2	1	2	0
Notification of anticipated startup [g]	2	1	2	0
Notification of actual startup [g]	2	1	2	0
Notification of special compliance requirements	N/A			
Notification of initial performance test [g]	2	1	2	0
Notification of compliance status [g]	4	1	4	0
NESHAP waiver application [h]	N/A			
Report of initial and periodic performance tests	See 3B			
Report of monitoring exceedances, including malfunctions [i]	16	2	32	20
Report of no excess emissions [j]	8	2	16	80
Reporting Subtotal				
4. Recordkeeping requirements				
A. Familiarization with regulatory requirements	See 3A			
B. Plan activities	See 3B			
C. Implement Activities	See 3B			
D. Develop record system	N/A			

E. Time to enter information				
Records of all information required by standards [k]	3	52	156	100
F. Time to train personnel	4	1	4	0
G. Time to transmit or disclose information [l]	0.25	3	0.75	100
H. Time for audits	N/A			
Recordkeeping Subtotal				
TOTAL LABOR BURDEN AND COST (rounded) [m]				
TOTAL CAPITAL and O&M COSTS (rounded) [m]				
GRAND TOTAL (rounded) [m]				

Assumptions:

[a] We have assumed that there are approximately 100 respondents subject to the standard (95 steel pickling and 5 aci respondent per year will become subject to the regulation in the next three years. Since there are no new respondents plans, and initial notifications do not apply.

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

[c] We have assumed that each new respondent will be required to conduct an initial performance test and 20 percent these requirements do not apply.

[d] Each respondent is required to conduct a periodic performance test to measure either: (1) the HCl mass flows at tl the control device. The test results must be reported within 2 months of the test date. Periodic performance tests mu that is approved by the applicable permitting authority, but no less frequently than every 2.5 years or twice per title conducted annually.

[e] We have assumed that it will take 125 hours for each respondent to complete the periodic performance test and rep

[f] We have assumed that 10 percent of respondents must write a revised operation and maintenance plan for each em

[g] We have assumed that all new sources will be required to meet initial notification requirements. Since there are nc

[h] We have assumed that no respondent will request a NESHAP waiver application.

[i] We have assumed that 20 percent of respondents will report excess emissions on a semiannual basis.

[j] We have assumed that 80 percent of respondents will report no excess emissions on a semiannual basis.

[k] We have assumed that each respondent will take three hours each week to record all information required by the s

[l] We have assumed that each respondent will take 15 minutes three times per year to transmit or disclose informatio

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

ydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (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)**	**Total Cost per year [b]**
100	5	10	$15,751
0	0	0	$0
0	0	0	$0
12,500	625	1,250	$1,968,831.25
0	0	0	$0
200	10	20	$31,501.30
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
640	32	64	$100,804.16
1,280	64	128	$201,608.32
16,928			***$2,318,496***

Total Number of Respondents	
Number of sources established in 2012 final rule amendments	100

15,600	780	1,560	$2,457,101.40
0	0	0	$0
75	3.75	7.5	$11,812.99
18,026			***$2,468,914***
35,000			**$4,790,000**
			$14,700
			$4,800,000

total # Response	300
hr/response	117

id regeneration facilities). We have further assumed that no additional
s estimated, initial performance tests, initial operation and maintenance

5); and Clerical $71.36 ($33.98 + 110%). These rates are from the United
l and industry group." The rates are from column 1, "Total compensation."
ess costs of employing workers beyond their wages and benefits, including

will have to repeat this test. Since there are no new respondents estimated,

he control device inlet and outlet or (2) the concentration of HCl exiting
ıst be conducted either annually or according to an alternative schedule
V permit term. We are assuming that all periodic performance tests are

port.

ıission control device.

› new respondents estimated, these requirements do not apply.

tandard.

›n.

Respondent Rates
(Source: United States Department of Labor, Bureau of Labor Statistics, December 2023, “Table 2. Civilian Workers, by occupational and industry group.”)

Labor Type	**Loaded Rate** (Rate + 110%rate)
Mgmt.	$172.41
Tech.	$141.75
Cler.	$71.36

Table 2: Average Annual EPA Burden and Cost – NESHAP for Steel Pickling, HCl Process Facilities and Hyd

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)	(D) Plants per year [a]
Report Review				
New Sources				
Notification of applicability [c]	2	1	2	0
Notification of construction/ reconstruction [c]	2	1	2	0
Notification of actual startup [c]	2	1	2	0
Notification of special compliance requirements	N/A			
Notification of initial performance test [c]	2	1	2	0
Notification of compliance status [c]	2	1	2	0
Review of initial performance test report [d]	4	1	4	0
Review of repeat initial performance test report [d, e]	4	0.2	0.8	0
Existing Sources				
Review of excess emissions report [f]	4	2	8	20
Review of no excess emissions report [g]	2	2	4	80
Review of periodic performance test report [h]	4	1	4	100
Review of waiver application [i]	2	1	2	0
TOTAL (rounded) [j]				

Assumptions:

[a] We have assumed that there are approximately 100 respondents subject to the standard. We have further assumed tha next three years. Since there are no new respondents estimated, initial performance tests and initial notifications do not

[b] This cost is based on the average hourly labor rate as follows: Managerial $76.91 (GS-13, Step 5, $48.07 + 60%); Te 3, $19.30+ 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 Management (OPM), 2024 General Schedule, which excludes locality, rates of pay. The rates have been increased by 6 employees.

[c] We have assumed that all new sources will be required to meet initial notification requirements. Since there are no ne

[d] We have assumed that the Agency will take 4 hours to participate in the performance tests. Since there are no new re

[e] We have assumed that 20 percent of new respondents will have to repeat the performance tests due to failure. Since t

[f] We have assumed that 20 percent of respondents will report excess emissions on a semiannual basis.

[g] We have assumed that 80 percent of respondents will report no excess emissions on a semiannual basis.

[h] Periodic performance tests are submitted at least twice every 5 years (title V permit term), but may be required by the all periodic performance tests are conducted annually.

[i] We have assumed that no waiver application is expected.

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

drochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) (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
0	0	0	$0
160	8	16	$9,746.48
320	16	32	$20,481.12
400	20	40	$25,601.40
0	0	0	$0
1,010			**$55,800**

(GS- 12, step 1) - Tech.
(GS- 13, step 5) - Mgmt.
(GS-6, step 3) - Cler.

t no additional respondent per year will become subject to the regulation in the
apply.

chnical $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
0 percent to account for the benefit packages available to government

w respondents estimated, these requirements do not apply.

spondents estimated, these requirements do not apply.

here are no new respondents estimated, these requirements do not apply.

e permitting authority to be submitted as frequently as annually. We assume that

With Fringe & Overhead
$57.07
$76.91
$30.88

Agency Rates
Source: Office of Personnel Management (OPM), 2024
General Schedule

Capital/Startup vs. Operation and M

(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost (B X C)
Flow-meters with high/low alarms	$1,151	0	$0

Note: Costs have been adjusted to 2023 dollars using the CEPCI index. Totals have been rounded to 3 signifi

Maintenance (O&M) Costs

(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M Costs (E X F)
$147	100	$14,700

cant values. Figures may not add exactly due to rounding.

CEPCI 2008: 575.4
CEPCI 2023: 797.9

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	100	0	0	100
2	0	100	0	0	100
3	0	100	0	0	100
Average	0	100	0	0	100

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

		Total Annual Responses
(A)	(B)	(C)
Information Collection Activity	Number of Respondents	Number of Responses
Notification of applicability	0	1
Notification of construction/reconstruction	0	1
Notification of anticipated startup	0	1
Notification of actual startup	0	1
Notification of special compliance requirements	0	1
Notification of initial performance test	0	1
Notification of compliance status	0	1
NESHAP waiver application	0	1
Report of initial performance test	0	1
Report of periodic performance test	100	1
Report of monitoring exceedances, including results of annual performance test	20	2
Report of no excess emissions, including results of annual performance test	80	2

(D)	(E)
Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	100
0	40
0	160
Total	300