

U.S. Environmental Protection Agency

Information Collection Request

Title: NESHAP for Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF) (Proposed Amendments)

OMB Control Number: 2060-0517

EPA ICR Number: 2003.10

Abstract: The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel (IIS) Manufacturing Facilities was proposed on July 13, 2001, promulgated on May 20, 2003, and amended on July 13, 2006 and July 13, 2020. The NESHAP is codified at 40 CFR Part 63, Subpart FFFFF. Amendments to the NESHAP are being proposed in response to the 2020 Louisiana Environmental Action Network (LEAN) decision (as discussed further below). The NESHAP applies to Integrated Iron and Steel Manufacturing Facilities that emit greater than or equal to 10 tons per year (tpy) of any one hazardous air pollutant (HAP) or greater than or equal to 25 tpy of any combination of HAPs. Affected sources include sinter plant windbox exhaust, discharge end, and sinter cooler; the blast furnace casthouse and stove; the Basic Oxygen Process Furnace (BOPF) shop, including each individual BOPF and shop ancillary operations (hot metal transfer, hot metal desulfurization, slag skimming, and ladle metallurgy), and fugitive and intermittent particulate sources. The pollutants regulated include HAP metals, using particulate matter (PM) as a surrogate, hydrochloric acid (HCl), total hydrocarbons (THC), dioxins and furans (D/F), and hydrofluoric acid (HF), carbon disulfide (CS₂), carbonyl sulfide (COS), polycyclic aromatic hydrocarbons (PAH), and volatile organic compounds (VOC) for the sinter plant. New facilities include those that commenced construction or reconstruction after the date of the original proposal (July 13, 2001). This information is being collected to assure compliance with 40 CFR Part 63, Subpart FFFFF.

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 317 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information 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 not conduct or 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.

In general, all NESHAP require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. Owners/operators are also required to maintain records of the occurrence and duration of any failures to meet applicable standards, 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 sources subject to NESHAP. A semiannual report is also required.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least 5 years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

The proposed amendments to the rule add performance test reports for several pollutants, fence-line monitoring requirements, and work practice standards for fugitive and intermittent particulate sources; and make technical and editorial changes. The proposed rule addresses the decision that was issued in *LEAN v. EPA*, in which the Court held that the EPA has an obligation to set standards for unregulated pollutants as part of technology reviews under CAA section 112(d)(6). The remaining portions of the NESHAP remain unchanged.

There are 8 major source facilities subject to the standard. These estimates are based on the research conducted by the EPA during the subpart FFFFF rulemaking, consultation with the industry, and information collection requests (ICR) conducted by EPA's Office of Air Quality Planning and Standards (OAQPS) in 2011 and 2022. The EPA is not aware of any new major source facilities being built.

None of the 8 II&S Manufacturing facilities in the United States are owned by state, local, or tribal governments or the Federal government. They are owned and operated by privately owned for-profit businesses.

The Office of Management and Budget (OMB) approved the currently active ICR without any "Terms of Clearance."

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.

Section 112 of the CAA requires the EPA to establish NESHAP for major sources of HAP that are listed for regulation under CAA section 112(c). A major source is a stationary source that emits or has the potential to emit more than 10 tpy of any single HAP or more than 25 tpy of any combination of HAP. For major sources, the NESHAP includes technology-based standards that must reflect the maximum degree of emission reductions of HAP achievable (after considering cost, energy requirements, and non-air quality health and environmental impacts). The NESHAP are commonly referred to as maximum achievable control technology (MACT) standards. In the Administrator's judgment, HAP emissions from II&S Manufacturing facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP for this source category were promulgated at 40 CFR Part 63, Subpart FFFFF in 2003.

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. Additionally, on April 21, 2020 a decision was issued in *LEAN v. EPA*, 955 F. 3d. 1088 (D.C. Cir. 2020) in which the Court held that the EPA has an obligation to set standards for unregulated pollutants as part of technology reviews under CAA section 112(d)(6).

Certain records and reports are necessary for the Administrator to confirm the compliance status of sources subject to NESHAP, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the CAA (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions (40 CFR Part 63, Subpart A). CAA Section 114(a) states that the Administrator may require any owner or 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.

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 control of emissions of HAP from II&S Manufacturing facilities requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of HAP from these sources are the result of operation of the affected sources.

The standards are achieved by the reduction of pollutant emissions using process changes and control technology. The notifications required in the 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 the standards are being met.

Performance test reports are needed, as these are the Agency's record of a source's initial and ongoing capability to comply with the emission standards and serve as a record of the operating conditions under which compliance was achieved. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

The information generated by the monitoring, recordkeeping, and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate their control equipment and achieve continuous compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the CAA. The information collected from recordkeeping and reporting requirements is also used for targeting inspections and is of sufficient quality to be used as evidence in court.

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, sources are using monitoring equipment that provides automated parameter data (e.g., continuous opacity or control device parameter monitoring). Although personnel at the facilities still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. Modern II&S Manufacturing facilities employ distributive controls on their manufacturing process and have integrated many of the compliance recordkeeping and reporting requirements into their systems. 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 LEAN 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.¹ 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 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

¹ As of 2019, Methods 1, 2, 2F, 2G, 3, 3A, 3B, 4, 5, 17, 29, are the test methods referenced in subpart FFFFF that are included in the ERT. Method 5D for Particulate Matter measurement from positive pressure fabric filter, Method 9 for Visual Opacity, Method 25 for gaseous nonmethane organic emissions, Method 30B for mercury emissions, and SW-846 Method 9071B for sinter plant feedstock are not yet supported by the ERT.
https://www3.epa.gov/ttn/chief/ert/ert_info.pdf

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, no duplication exists.

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.

All of the respondents are large entities (i.e., large businesses), there are no small businesses operating II&S manufacturing facilities

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 5 years. This is consistent with the General Provisions of 40 CFR part 63 as applied to the standards. EPA believes that the 5-year records retention requirement is consistent with the part 70 operating permits program and the 5-year statute of limitations on which the permits program is based. The retention of records for 5 years allows EPA to establish the compliance history of a source and 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 5 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.

This section is not applicable because this is a rule-related ICR. Nevertheless, the preamble to the proposed rule (89 FR 49402) provided public notice of this ICR on July 31, 2023.

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 Iron and Steel Institute (AISI) and member companies of this organization. Further stakeholder and public input occurred through public comment on the proposed LEAN amendments to Subpart FFFFF 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 2011 and in 2022 to gather data from the II&S manufacturing industry. The results from the questionnaire 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.

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.

None of the reporting or recordkeeping requirements or the proposed LEAN amendments contain 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 and the proposed LEAN amendments are II&S Manufacturing facilities. The North American Industry Classification System (NAICS) code for respondents affected by the standards is listed in the table below.

Standard (40 CFR Part 63, Subpart FFFFF)	NAICS Codes
Integrated Iron and Steel Manufacturing	331110

12b. Information Requested

All data in this ICR that are recorded and/or reported are required by 40 CFR Part 63, Subpart FFFFF or would be required under the proposed LEAN amendments. Subpart FFFFF 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 notifications and reports:

Notifications	
Applicability	§63.5(b), §63.7840(a), §63.9(b)(2)
Commencement of construction or reconstruction	§§63.9(b)(4)-(5), §63.7840(a), §63.5
Actual startup	§63.9(b)(4), §§63.7840(b)-(c)
Intention to construct/reconstruct	§63.9(b)(1), §63.7840(a)
Compliance dates/extension	§63.9(c), §63.7840(a)
Performance test/performance evaluation/opacity observations	§63.9(e), §63.9(g), §63.7840(a), §§63.7840(d)-(e), §63.7(b), §63.8(e)
Compliance status (including electronic submittal of performance	§§63.9(g)-(h), §§63.7840(e)-(h)

Notifications	
test data)	

Reports	
Application for approval of the construction or reconstruction of a new major affected source, or reconstruction of a major affected source	§63.5(d)(2)
Performance test results	§63.10(d)(2), §63.7840(e)(2)
Work practice plans	§63.7793(b)(1), §63.7793(f)
Fenceline monitoring plan	§63.7792(f)
Fenceline monitoring reports	§63.7841(h)
Operation and maintenance plan	§63.7800(b)
Progress reports for compliance extension (if applicable)	§63.6(i)(11)
Semiannual report of compliance	§§63.7841(a)-(b)
Electronic submittal of semiannual reports	§§63.7841(c)-(f)

A source must keep the following records:

Recordkeeping	
Notifications and reports	§63.10(b)(2)(xiv), §63.7842(a)(1)
Record retention	§63.10(b)(1)
Records of date, time, and duration of failures to meet applicable standards	§63.7842(a)(2)
For each failure, a list of affected sources or equipment, noncompliant emissions estimates, and method used to estimate emissions	§63.7842(a)(3)
Records of actions taken to minimize emissions and corrective	§63.7842(a)(4)

Recordkeeping	
actions taken to return affected unit to normal operation	
Performance test and opacity observations	§63.10(b)(2)(viii), §63.7842(a)(5)
Continuous monitoring systems	§§63.10(b)(2)(vi)-(xi), §63.8(d)(2), §§63.6(h)(7)(i)-(ii), §63.7842(b)
Visual observations	§63.6(h)(6), §63.7842(c)
Records required to demonstrate continuous compliance with emission limitations and operation and maintenance requirements	§63.10(b)(2)(vii), §63.7833, §63.7834, §63.7842(d)
Records to demonstrate compliance with requirements for control of mercury	§63.7842(e), §63.7791(a)-(b)
Records required to demonstrate continuous compliance with fenceline monitoring requirements	§63.7842(f)

12c. Respondent Activities

The respondent activities required by Subpart FFFFF are listed in the following table.

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate any: CMS, COMS for opacity for any baghouse or electrostatic precipitator, CPMS for pressure drop for any baghouse, or CPMS for pressure drop and water flow rate for any venturi scrubber.
Conduct performance tests using EPA Reference Methods 1, 2, 2F, 2G, 3, 3A, 3B, 4, 5, 5D, 9, 15, 17, 22, 25, 25A, 26A, 29, 30B, 320, or SW-846 Method 9071B, and repeat performance tests if necessary.
Conduct monitoring along the facility fenceline at 4 locations.
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 the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of 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

Based on our research for this ICR, there are approximately 8 existing sources currently subject to the standard, all of which will keep records and submit reports. The average number of respondents is calculated using the following table that addresses the 3 years covered by this ICR.

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ^a	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	8	0	0	8
2	0	8	0	0	8

Number of Respondents					
3	0	8	0	0	8
Average	0	8	0	0	8

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

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the 3-year period of this ICR is 8.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(B \times C)+D$
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 test	0	1	0	0
Semiannual compliance reports	8	2	0	16

Total Annual Responses				
Report of performance test (through CEDRI using ERT)				
Method 5 test report	3.2	1	0	3.2
Method 9 test report, Sinter Plants	1.2	1	0	1.2
Method 29 test report, BOPF Groups	0	1	0	0
Method 29 test report, Sinter Plants	0.6	1	0	0.6
Method 25A test report	1.6	1	0	1.6
Method 26A test report	0	1	0	0
Method 15 test report	0	1	0	0
Method 320 test report	1.6	1	0	1.6
Method 23 test report	1.6	1	0	1.6
Method 9 test report, non-Sinter Plants	8	4	0	32
Method 22 test report	6	1	0	6
Fenceline monitoring report submittal (through CEDRI using electronic reporting)	8	4	0	32
			Total	96

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

The number of Total Annual Responses is 96, all of which will be submitted electronically.

The average annual burden to industry over the next 3 years from these recordkeeping and reporting requirements and the proposed LEAN amendments is estimated to be 30,400 hours per year (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 for Subpart FFFFF, and any comments received

This ICR uses the following labor rates:

Civilian Worker Rates	Labor Rates, \$/hr ^a	110% Overhead	Total, \$/hr
Managerial	\$77.70	\$85.47	\$163.17
Technical	\$62.04	\$68.24	\$130.28
Clerical	\$31.29	\$34.42	\$65.71

^a <http://data.bls.gov/cgi-bin/print.pl/news.release/ecec.t02.htm>

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.

The total annual labor hours are 30,400 at a cost of \$3,950,000. Details regarding these estimates may be found in Table 1: Average Annual Respondent Burden and Cost – NESHAP for Integrated Iron and Steel Manufacturing facilities (40 CFR Part 63, Subpart FFFFF) (Proposed Amendments).

We assume that burdens for managerial tasks take 5 percent 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 percent 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 317 hours per response.

The total annual labor costs are \$3,950,000. Details regarding these estimates may be found below in Table 1: Average Annual Respondent Burden and Cost – NESHAP for Integrated Iron and Steel Manufacturing facilities (40 CFR Part 63, Subpart FFFFF) (Proposed Amendments).

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 are both labor costs (which are addressed elsewhere in this ICR) and the costs associated with continuous monitoring and other compliance activities. The capital/startup costs are one-time costs when a facility becomes subject to the regulation and include startup cost for continuous monitoring systems (CMS). The annual operation and maintenance (O&M) costs are the ongoing costs to maintain the monitors. The EPA does not anticipate any new II&S manufacturing facilities to be built.

The table below summarizes the capital/startup and O&M costs associated with monitors.

Capital/Startup vs. O&M Costs						
(A) Cost Item	(B) Capital/ Startup Cost for One Respondent	(C) Number of Respondents	(D) Total Capital/ Startup 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	\$2,389	8	\$19,112
Continuous opacity monitors	\$37,000	0	0	\$8,000	3	\$24,000
Fenceline monitors	\$100,000	8	\$800,000	\$8,100	8	\$64,800
Stockline monitors	\$183,600	8	\$1,468,800	\$0	8	\$0
Total			\$2,270,000			\$108,000
Total annualized capital + O&M cost						\$864,000

The total capital/startup costs for this ICR are \$2,270,000. This is the total of column D in the above table. The annualized capital/startup costs are \$756,000. The total annual O&M costs are \$108,000. This is the total of column G. The average annualized cost for capital/startup and O&M costs to industry over the next 3 years of the ICR is estimated to be \$864,000.

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.

Agency Activities
Observe performance tests and repeat performance tests if necessary.
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 Integrated Compliance Information System (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. 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.

14b. Agency Labor Cost

The only costs to the Agency are costs associated with observation of the initial performance tests and analysis of the reported information. Publication and distribution of the information are part of the ECHO program. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of the EPA's overall compliance and enforcement program. The average annual Agency cost during the 3 years of the ICR is estimated to be \$47,800.

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

Agency Worker Rates	Labor Rates, \$/hr ^a	60% Overhead	Total, \$/hr
Managerial (GS-13, step 5)	\$44.10	\$26.46	\$70.56
Technical (GS-12, step 1)	\$32.73	\$19.64	\$52.37
Clerical (GS-6, step 3)	\$17.71	\$10.63	\$28.34

^a https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/GS_h.pdf

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. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF) (Proposed Amendments).

The average annual Agency burden and cost over the next 3 years are estimated to be 937 labor hours and \$47,800. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Integrated Iron and Steel Manufacturing facilities (40 CFR Part 63, Subpart FFFFF) (Proposed Amendments).

We assume that burdens for managerial tasks take 5 percent 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 percent of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies, and maintain records.

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.

This ICR is prepared for proposed LEAN amendments to the NESHAP for Integrated Iron and Steel Manufacturing facilities (40 CFR, Part 63, Subpart FFFFF). These proposed LEAN amendments: (1) add requirements for the control of pollutants from blast furnace stoves; (2) add requirements for work practice standards and opacity limits for fugitive and intermittent particulate sources (blast furnace bleeder valve unplanned openings; blast furnace bleeder valve planned openings; blast furnace bell leaks; blast furnace casthouse fugitives; blast furnace iron beaching; blast furnace slag handling and storage operations; and basic oxygen process furnace shop fugitives); (3) add requirements for the control of unregulated pollutants from sinter plants, blast furnaces, and basic oxygen process furnaces; (4) add requirements for fenceline monitoring; and (5) make technical and editorial changes. Where applicable, adjustments for these proposed LEAN amendments are reflected in Tables 1 and 2 of this ICR.

The number of affected facilities changed because of continued closures within the Integrated Iron and Steel Manufacturing industry, which reduced the number of facilities previously affected by Subpart FFFFF.

Costs per labor hour increased slightly due to increases in Technical, Managerial, and Clerical labor rates. Burden estimates were added for the industry to meet the new performance testing requirements and fenceline monitoring requirements, prepare test plans for work practices and fenceline monitoring, report the results of the performance tests through the ERT, and submit fenceline monitoring reports through CEDRI.

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: Average Annual Respondent Burden and Cost – NESHAP for Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF)
(Proposed Amendments)**

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	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
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarization with rule requirements	2	1	2	8	16	0.8	1.6	\$2,320
B. Required activities ^c								
i. Method 5 performance test ^d	40	10.5	420	3.2	1,344	67.2	134.4	\$194,893
ii. Method 9 performance test, Sinter Plants ^d	8	2.7	22	1.2	25.9	1.3	2.6	\$3,759
iii. Method 9071B performance test ^d	2	365	730	4	2,920	146.0	292	\$386,215
iv. Method 29 performance test, BOPF Groups ^d	40	6.3	252	0	0	0	0	\$0
v. Certify compliance with NVMSRP/approved mercury removal program or nonmercury scrap ^d	4	1	4	8	32	1.6	3	\$4,640
vi. Method 29 performance test, Sinter Plants ^d	40	1.3	53	0.6	32	2	3	\$4,640
vii. Method 25A performance test ^d	40	6.9	276	1.6	442	22	44	\$64,036
viii. Method 26A performance test ^d	40	7.4	296	0	0	0	0	\$0
ix. Method 15 performance test ^d	40	1.3	53.3	0	0	0	0	\$0
x. Method 320 performance test ^d	40	7.4	296	1.6	474	24	47	\$68,676
xi. Method 23 performance test ^d	40	5.3	212	1.6	339	17	34	\$49,187
xii. Method 9 performance test, BF	2	86.4	173	8	1,382	69	138	\$200,461

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	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
Casthouse/BOPF Shop ^d								
xiii. Method 9 performance test, BF Planned Openings ^d	1	104	104	8	832	42	83	\$120,648
xiv. Method 9 performance test, Slag Operations ^d	3	52	156	8	1,248	62	125	\$180,972
xv. Method 22 performance test ^d	1	18	18	6	108	5	11	\$15,661
xvi. Inspection and maintenance of capture systems and control devices	2	12	24	8	192	9.6	19.2	\$27,842
xvii. Fenceline monitoring ^e	8	244	1,952	8	15,616	781	1,562	\$2,264,468
xviii. Create work practice plans ^f	20	2	40	2.7	107	5	11	\$15,468
xix. Create fenceline monitoring plan ^f	20	1	20	2.7	53	3	5	\$7,734
C. Gather existing information	See 4D, 4E							
D. Write report ^c								
i. Notification of applicability ^e	2	1	2	0	0	0	0	\$0
ii. Notification of compliance status ^e	2	1	2	0	0	0	0	\$0
iii. Notification of intent to construct a major source and review application ^e	4	1	4	0	0	0	0	\$0
iv. Notification of initial construction/reconstruction ^e	4	1	4	0	0			\$0
v. Notification of actual startup ^e	4	1	4	0	0	0	0	\$0
vi. Notification of performance test ^e	4	1	4	0	0	0	0	\$0

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	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
vii. Reports of performance test results	See 3B, 4E							
viii. Semiannual compliance reports	40	2	80	8	640	32	64	\$92,806
ix. Report of performance test (through CEDRI using ERT) ^f								
a. Method 5 test report	8	1	8	3.2	26	1	3	\$3,712
b. Method 9 test report, Sinter Plants	8	1	8	1.2	10	0	1	\$1,392
c. Method 29 test report, BOPF Groups	8	1	8	0	0	0	0	\$0
d. Method 29 test report, Sinter Plants	8	1	8	0.6	5	0	0	\$696
e. Method 25A test report	8	1	8	1.6	13	1	1	\$1,856
f. Method 26A test report	8	1	8	0	0	0	0	\$0
g. Method 15 test report	8	1	8	0	0	0	0	\$0
h. Method 320 test report	8	1	8	1.6	13	1	1	\$1,856
i. Method 23 test report	8	1	8	1.6	13	1	1	\$1,856
j. Method 9 test report, non-Sinter Plants	8	4	32	8	256	13	26	\$37,122
k. Method 22 test report	8	1	8	6	48	2	5	\$6,960
x. Fenceline monitoring report submittal (through CEDRI using electronic reporting) ^h	8	4	32	8	256	13	26	\$37,122
Subtotal for Reporting Requirements					6,483			\$3,834,214
4. Recordkeeping Requirements								

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	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
A. Familiarization with rule requirements	See 3A							
B. Plan activities ^c	10	1	10	0	0	0	0	\$0
C. Implement activities	See 3B							
D. Develop record system/maintain records ^c	4	1	4	8	32	1.6	3.2	\$4,640
E. Time to enter and transmit information	See 3D ix.							
F. Time to train personnel ^c	3	1	3	0	0	0	0	\$0
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					37			\$4,640
TOTAL LABOR BURDEN AND COST (rounded) ^h					30,400			\$3,840,000
TOTAL CAPITAL AND O&M COST (rounded) ^h								\$108,000
GRAND TOTAL (rounded) ^h								\$3,950,000

^a There are approximately 8 existing sources currently subject to this rule. We estimate there will be no additional new source that will become subject to the rule each year over the 3-year period of this ICR.

^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 Monitoring and recordkeeping of operations for respondents will include monthly inspection of capture and control systems; daily testing of oil content for the sinter plant feed [3 plants, 4 strands (from the composite of three samples taken at 8-hour intervals)] to compute the 30-day rolling average oil content for each operating day; and every 2.5 years, each non-baghouse emission point must be sampled by Method 5 for particulate matter, Method 9 for opacity observations to determine the opacity of fugitive

emissions; and once during each term of their title V operating permit, each baghouse emission point must be sampled by Method 5 for particulate matter, Method 9 for opacity observations to determine the opacity of fugitive emissions (2.7=8/3 plants). Compliance for mercury emissions from BOPF groups includes using Method 29 twice per permit cycle or certify compliance with NVMSRP/approved mercury removal program or certify the use of scrap without mercury annually. Method 29 testing for sinter plants, Method 25A testing, Method 26A testing, Method 15 testing, and Method 23 testing are required every 5 years. Method 320 testing may be used in place of Method 26A testing and/or Method 15 testing.

^d We have assumed that there is an average of 10.5 (84/8) emission points per respondent that need to be sampled using Method 5; 2.7 (8/3) sinter plant emission points per respondent that need to be sampled using Method 9; 4 emissions points per respondent that need to be sampled using Method 9071B, Method 15, and Method 29 for sinter plants (3 facilities with sinter plants, 1 facility has 2 strands), the oil content of the sinter feed must be analyzed each day; 6.3 (69/11) emission points per respondent that need to be sampled using Method 29 for BOPF groups; 6.9 (55/8) emission points per respondent that need to be sampled using Method 25A; 7.4 (59/8) emission points per respondent that need to be sampled using Method 26A and Method 320; 5.3 (42/8) emission points per respondent that need to be sampled using Method 23; 3.6 (29/8) emission points per respondent that need to be sampled using Method 9 for BF casthouse and BOPF shop fugitive emissions; 2 (16/8) BFs per respondent that must conduct Method 9 testing for planned bleeder valve openings weekly (2x52=104); 1 emission point per respondent that must conduct Method 9 testing for slag operations weekly (1x52=52); 1.5 (9/6) BFs with replaceable bell seals per respondent that must conduct Method 22 testing monthly (1.5x12=18). We have assumed Method 29 mercury add-on costs to Method 5 for PM of \$6,240 per test. We have estimated that 0 (zero) facilities will choose to comply with \$63.7791 with a Method 29 stack test per \$63.7825(a)-(f) and 8 facilities will choose to comply with \$63.7791 using the NVMSRP/approved mercury removal program, or use of scrap that does not contain mercury per \$63.7791(b), (c), or (d). We have estimated that 0 (zero) facilities will choose to use Method 26A testing or Method 15 testing and 8 facilities will choose to comply with HCl, HF, CS₂, and COS testing requirements with Method 320 testing.

^e 4 samplers are required per facility. Samples are collected every 6 days.

^f A "Slip Avoidance Plan" is required for unplanned bleeder valve openings, "BOPF Shop Operating Plan" is required for BOPF shop fugitive emissions, and a site-specific fenceline monitoring plan is required for each facility. These activities will only occur in the first year, not in any subsequent years.

^g These requirements are one-time requirements that apply to new respondents. There are no new respondents estimated over the 3-year period of this ICR.

^h Submittal of test data through the EPA's CEDRI in ERT format is estimated to require 8 hours per test, includes keeping records of failures to meet the standards and the actions taken to minimize emissions.

ⁱ We have assumed that it takes each respondent approximately 4 hours to develop a record system to certify compliance with NVMSRP/approved mercury removal program or nonmercury scrap and maintain records.

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

Table 2: Average Annual EPA Burden and Cost – NESHAP for Integrated Iron and Steel Manufacturing Facilities (40 CFR Part 63, Subpart FFFFF) (Proposed Amendments)

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	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	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
New Respondents ^c								
i. Notification of compliance status	4	1	4	0	0	0	0	\$0
ii. Notification of intent to construct a major source and review application	4	1	4	0	0	0	0	\$0
iii. Notification of start of construction	2	1	2	0	0	0	0	\$0
iv. Notification of actual startup	2	1	2	0	0	0	0	\$0
v. Notification of initial performance test and test plan	4	1	4	0	0	0	0	\$0
Existing Respondents					0	0	0	\$0
i. CEDRI-submitted test reports ^d								
a. Method 5 test report	8	1	8	3.2	26	1.3	2.6	\$1,504
b. Method 9 test report, Sinter Plants	8	1	8	1.2	10	0.5	1	\$564
c. Method 29 test report, BOPF Groups	8	1	8	0	0	0	0	\$0
d. Method 29 test report, Sinter Plants	8	1	8	0.6	5	0.2	0.5	\$282
e. Method 25A test report	8	1	8	1.6	13	0.6	1.3	\$752
f. Method 26A test report	8	1	8	0	0	0	0	\$0
g. Method 15 test report	8	1	8	0	0	0	0	\$0
h. Method 320 test report	8	1	8	1.6	13	0.6	1.3	\$752

i. Method 23 test report	8	1	8	1.6	13	0.6	1.3	\$752
j. Method 9 test report	8	4	32	8	256	13	26	\$15,035
k. Method 22 test report	8	1	8	6	48	2.4	4.8	\$2,819
l. Fenceline monitoring report	8	4	32	8	256	13	26	\$15,035
ii. Review semiannual compliance reports ^e	6	2	12	8	96	4.8	9.6	\$5,638
iii. Certify compliance with NVMSRP/approved mercury removal program or nonmercury scrap	2	1	2	8	16	0.8	1.6	\$940
iv. Review work practice plans ^g	8	2	16	2.7	43	2.1	4.3	\$2,506
v. Review fenceline monitoring plans ^g	8	1	8	2.7	21	1.1	2.1	\$1,253
Subtotals Labor Burden and Cost					937			\$47,831
TOTAL ANNUAL BURDEN AND COST (rounded) ^g					937			\$47,800

^a There are approximately 8 existing sources currently subject to this rule. We expect there will be no additional new source that will become subject to the rule each year over the 3-year period of this ICR.

^b 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 These requirements are one-time requirements that apply to new respondents. There are no new respondents estimated over the 3 year period of this ICR.

^d Respondents must sample each emission point using Method 5 for particulate matter and Method 9 for sinter plant opacity observations every 2.5 years; and sample emission points using Method 29 for sinter plant mercury emissions, Method 25A for THC, Method 26A or 320 for HCl and HF, Method 15 or 320 for CS₂ and COS, and Method 23 for D/F and PAH every 5 years. Reporters must submit electronic reports to CEDRI with results of each test. Test results throughout the year from using Method 9 for BF casthouse, BOPF shop, BF planned openings, and slag operations opacity observations, Method 22 for visible emissions, and fenceline monitoring reports must also be submitted through CEDRI.

^e Sources are required to submit electronic semiannual compliance reports to CEDRI.

^f We have assumed that each facility per year will submit their certification of compliance with NVMSRP/approved mercury removal program or nonmercury scrap for EPA review.

^g These plans are only submitted in the first year of the 3-year period covered by this ICR.

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

