

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting Requirements			
A. Familiarization with rule requirements	2	1	2
B. Required activities ^c			
i. Method 5 performance test ^d	40	10.5	420
ii. Method 9 performance test, Sinter Plants ^d	8	2.7	21.6
iii. Method 9071B performance test ^d	2	365	730
iv. Method 29 performance test, BOPF Groups ^d	40	6.3	252
v. Certify compliance with NVMSRP/approved mercury removal program or nonmercury scrap ^d	4	1	4
vi. Method 29 performance test, Sinter Plants ^d	40	1.3	53.3
vii. Method 25A performance test ^d	40	6.9	276
viii. Method 26A performance test ^d	40	7.4	296
ix. Method 15 performance test ^d	40	1.3	53.3
x. Method 320 performance test ^d	40	7.4	296
xi. Method 23 performance test ^d	40	5.3	212
xii. Method 9 performance test, BF Casthouse/BOPF Shop ^d	2	86.4	172.8
xiii. Method 9 performance test, BF Planned Openings ^d	1	104	104
xiv. Method 9 performance test, Slag Operations ^d	3	52	156
xv. Method 22 performance test ^d	1	18	18
xvi. Inspection and maintenance of capture systems and control devices	2	12	24
xvii. Fenceline monitoring ^e	8	244	1952
xviii. Create work practice plans ^f	20	2	40
xix. Create fenceline monitoring plan ^f	20	1	20
C. Gather existing information	See 4D, 4E		
D. Write report ^c			
i. Notification of applicability ^g	2	1	2
ii. Notification of compliance status ^g	2	1	2
iii. Notification of intent to construct a major source and review application ^g	4	1	4
iv. Notification of initial construction/reconstruction ^g	4	1	4
v. Notification of actual startup ^g	4	1	4
vi. Notification of performance test ^g	4	1	4
vii. Reports of performance test results	See 3B, 4E		
viii. Semiannual compliance reports	40	2	80
ix. Report of performance test (through CEDRI using electronic reporting) ^h			
a. Method 5 test report	8	1	8
b. Method 9 test report, Sinter Plants	8	1	8
c. Method 29 test report, BOPF Groups	8	1	8
d. Method 29 test report, Sinter Plants	8	1	8
e. Method 25A test report	8	1	8

f. Method 26A test report	8	1	8
g. Method 15 test report	8	1	8
h. Method 320 test report	8	1	8
i. Method 23 test report	8	1	8
j. Method 9 test report, non-Sinter Plants	8	4	32
k. Method 22 test report	8	1	8
x. Fenceline monitoring report submittal (through CEDRI using electronic reporting) ^h	8	4	32
Subtotal for Reporting Requirements			
4. Recordkeeping Requirements			
A. Familiarization with rule requirements	See 3A		
B. Plan activities ^g	10	1	10
C. Implement activities	See 3B		
D. Develop record system/maintain records ⁱ	4	1	4
E. Time to enter and transmit information	See 3D ix.		
F. Time to train personnel ^g	3	1	3
G. Time for audits	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (unrounded)			
TOTAL LABOR BURDEN AND COST (rounded) ^j			
TOTAL CAPITAL AND O&M COST (rounded) ^j			
GRAND TOTAL (rounded) ^j			

Assumptions:

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

^b This ICR uses the following labor rates: \$163.17 per hour for Executive, Administrative, and Managerial labor; \$130. rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, “Table 2. Civilian V “Total Compensation.” The rates have been increased by 110% to account for the benefit packages available to those c

^c Monitoring and recordkeeping of operations for respondents will include monthly inspection of capture and control sy (from the composite of three samples taken at 8-hour intervals)] to compute the 30-day rolling average oil content for e be sampled by Method 5 for particulate matter, Method 9 for opacity observations to determine the opacity of fugitive baghouse emission point must be sampled by Method 5 for particulate matter, Method 9 for opacity observations to de mercury emissions from BOPF groups includes using Method 29 twice per permit cycle or certify compliance with NV mercury annually. Method 29 testing for sinter plants, Method 25A testing, Method 26A testing, Method 15 testing, an 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 sampled using Method 9; 4 emissions points per respondent that need to be sampled using Method 9071B, Method 15, strands), the oil content of the sinter feed must be analyzed each day; 6.3 (69/11) emission points per respondent that n points per respondent that need to be sampled using Method 25A; 7.4 (59/8) emission points per respondent that need t per respondent that need to be sampled using Method 23; 3.6 (29/8) emission points per respondent that need to be sam (16/8) BF's per respondent that must conduct Method 9 testing for planned bleeder valve openings weekly (2x52=104); operations weekly (1x52=52); 1.5 (9/6) BF's with replaceable bell seals per respondent that must conduct Method 22 te to Method 5 for PM of \$6,240 per test. We have estimated that 0 (zero) facilities will choose to comply with \$63.7791 comply with \$63.7791 using the NVMSRP/approved mercury removal program, or use of scrap that does not contain r will choose to use Method 26A testing or Method 15 testing and 8 facilities will choose to comply with HCl, HF, CS₂,

^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 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.

^h Submittal of test data through the EPA's CEDRI in ERT format is estimated to require 8 hours per test, includes keeping records.

ⁱ We have assumed that it takes each respondent approximately 4 hours to develop a record system to certify compliance and maintain records.

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

	\$130.28	\$163.17	\$65.71	Labor Cost Per Hour
(D)	(E)	(F)	(G)	(H)
Respondents per year ^a	Technical person- hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Cost Per year ^b
8	16	0.8	1.6	\$2,320
3.2	1,344	67.2	134.4	\$194,893
1.2	25.9	1.30	2.59	\$3,759
4	2,920	146.0	292	\$423,428
0	0	0	0	\$0
8	32	1.6	3	\$4,640
0.6	32	2	3	\$4,640
1.6	442	22	44	\$64,036
0	0	0	0	\$0
0	0	0	0	\$0
1.6	474	24	47	\$68,676
1.6	339	17	34	\$49,187
8	1,382	69	138	\$200,461
8	832	42	83	\$120,648
8	1,248	62	125	\$180,972
6	108	5	11	\$15,661
8	192	9.6	19.2	\$27,842
8	15,616	781	1,562	\$2,264,468
2.7	107	5	11	\$15,468
2.7	53	3	5	\$7,734
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
8	640	32	64	\$92,806
3.2	26	1	3	\$3,712
1.2	10	0	1	\$1,392
0	0	0	0	\$0
0.6	5	0	0	\$696
1.6	13	1	1	\$1,856

No. of responses
0
0
0
0
0
0
0
16
0
3.2
1.2
0
0.6
1.6

0	0	0	0	\$0
0	0	0	0	\$0
1.6	13	1	1	\$1,856
1.6	13	1	1	\$1,856
8	256	13	26	\$37,122
6	48	2	5	\$6,960
8	256	13	26	\$37,122
30,407				\$3,834,214
0	0	0	0	\$0
8	32	1.6	3.2	\$4,640
0	0	0	0	\$0
37				\$4,640
30,444				\$3,838,854
30,400				\$3,840,000
				\$108,000
				\$3,950,000

0
0
1.6
1.6
32
6
32
96

Hours per response
317

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

.28 per hour for Technical labor, and \$65.71 per hour for Clerical labor. These Workers, by Occupational and Industry group.” The rates are from column 1, employed by private industry.

systems; daily testing of oil content for the sinter plant feed [3 plants, 4 strands each operating day; and every 2.5 years, each non-baghouse emission point must emissions; and once during each term of their title V operating permit, each terminate the opacity of fugitive emissions (2.7=8/3 plants). Compliance for MSRP/approved mercury removal program or certify the use of scrap without Method 23 testing are required every 5 years. Method 320 testing may

g Method 5; 2.7 (8/3) sinter plant emission points per respondent that need to be and Method 29 for sinter plants (3 facilities with sinter plants, 1 facility has 2 need to be sampled using Method 29 for BOPF groups; 6.9 (55/8) emission points to be sampled using Method 26A and Method 320; 5.3 (42/8) emission points sampled using Method 9 for BF casthouse and BOPF shop fugitive emissions; 2 .1 emission point per respondent that must conduct Method 9 testing for slag testing monthly (1.5x12=18). We have assumed Method 29 mercury add-on costs with a Method 29 stack test per §63.7825(a)-(f) and 8 facilities will choose to mercury per §63.7791(b), (c), or (d). We have estimated that 0 (zero) facilities and COS testing requirements with Method 320 testing.

for BOPF shop fugitive emissions, and a site-specific fenceline monitoring plan

d over the 3-year period of this ICR.

ing records of failures to meet the standards and the actions taken to minimize

ce with NVMSRP/approved mercury removal program or nonmercury scrap and

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

Activity	(A)	(B)	(C)	(D)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Plants per year ^a
New Respondents ^c				
i. Notification of compliance status	4	1	4	0
ii. Notification of intent to construct a major source and review application	4	1	4	0
iii. Notification of start of construction	2	1	2	0
iv. Notification of actual startup	2	1	2	0
v. Notification of initial performance test and test plan	4	1	4	0
Existing Respondents				
i. CEDRI-submitted test reports ^d				
a. Method 5 test report	8	1	8	3.2
b. Method 9 test report, Sinter Plants	8	1	8	1.2
c. Method 29 test report, BOPF Groups	8	1	8	0
d. Method 29 test report, Sinter Plants	8	1	8	0.6
e. Method 25A test report	8	1	8	1.6
f. Method 26A test report	8	1	8	0
g. Method 15 test report	8	1	8	0
h. Method 320 test report	8	1	8	1.6
i. Method 23 test report	8	1	8	1.6
j. Method 9 test report	8	4	32	8
k. Method 22 test report	8	1	8	6
l. Fenceline monitoring report	8	4	32	8
ii. Review semiannual compliance reports ^e	6	2	12	8
iii. Certify compliance with NVMSRP/approved mercury removal program or nonmercury scrap ^f	2	1	2	8
iv. Review work practice plans ^g	8	2	16	2.7
v. Review fenceline monitoring plans ^g	8	1	8	2.7
Subtotals Labor Burden and Cost				
TOTAL ANNUAL BURDEN AND COST (rounded)^h				

Assumptions:

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

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for gov (\$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, \$17.7 “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 c

^d Respondents must sample each emission point using Method 5 for particulate matter and Method 9 for sinter plant opac 29 for sinter plant mercury emissions, Method 25A for THC, Method 26A or 320 for HCl and HF, Method 15 or 320 for must submit electronic reports to CEDRI with results of each test. Test results throughout the year from using Method 9 f opacity observations, Method 22 for visible emissions, and fenceline monitoring reports must also be submitted through c

^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 merc

^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.

ESHAP for Integrated Iron and Steel Manufacturing (40 CFR Part 63, Subpart FFFFF) (P

\$52.37	\$70.56	\$28.34	Labor Cost per Hour
(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
26	1.3	2.6	\$1,504
10	0.5	1.0	\$564
0	0.0	0.0	\$0
5	0.2	0.5	\$282
13	0.6	1.3	\$752
0	0.0	0.0	\$0
0	0.0	0.0	\$0
13	0.6	1.3	\$752
13	0.6	1.3	\$752
256	12.8	25.6	\$15,035
48	2.4	4.8	\$2,819
256	12.8	25.6	\$15,035
96	4.8	9.6	\$5,638
16	0.8	1.6	\$940
43	2.1	4.3	\$2,506
21	1.1	2.1	\$1,253
937			\$47,831
937			\$47,800

10.626

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

vernment overhead expenses: Managerial rate of \$70.56 (GS-13, Step 5, '1 + 60%). These rates are from the Office of Personnel Management (OPM)

over the 3 year period of this ICR.

ity observations every 2.5 years; and sample emission points using Method CS₂ and COS, and Method 23 for D/F and PAH every 5 years. Reporters for BF casthouse, BOPF shop, BF planned openings, and slag operations CEDRI.

cury removal program or nonmercury scrap for EPA review.

roposed Amendments)

(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M
Leak detectors	\$9,000	0	0	\$2,389	8
Continuous opacity monitors	\$37,000	0	0	\$8,000	3
Fenceline monitors	\$100,000	8	\$800,000	\$8,100	8
Stockline monitors	\$183,600	8	\$1,468,800	\$0	8
TOTAL			\$2,270,000		

(G)
Total O&M,
\$19,112
\$24,000
\$64,800
\$0
\$108,000