

Table 1: Annual Respondent Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels (40 CFR part 60, subparts AA and AAa) (Renewal)

REPORTING/RECORDKEEPING REQUIREMENT			(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year ^a	(E) Technical Hours per Year @ \$97.59 (E=C x D)	(F) Management Hours per Year @ \$114.77 (F= E x 0.05)	(G) Clerical Hours per Year @ \$48.26 (G= E x	Total Labor Costs per Year	
1.	APPLICATIONS		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2.	SURVEY AND STUDIES		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
3.	ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS ^b		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
4.	REPORTING REQUIREMENTS										
	A.	Read instructions	-----Included in 4B-----								
	B.	Required activities									
		Initial Performance tests ^b	364	1	364	0.3	109.2	5.46	10.92	\$11,810.47	
		Repeat Performance tests ^b	364	0.2	72.8	0.3	21.84	1.092	2.184	\$2,362.09	
		Monitoring of operations and emissions ^{c, d}	-----Included in 5E-----								
	D.	Gather Existing Information	-----Included in 4B and 5E-----								
	E.	Write report ^b									
		Notification of construction/ modification	2	1	2	0.3	0.6	0.03	0.06	\$64.89	
		Notification of actual startup	2	1	2	0.3	0.6	0.03	0.06	\$64.89	
		Notification of initial performance test	2	1	2	0.3	0.6	0.03	0.06	\$64.89	
		Reports of performance test results	-----Included in 4B-----								
		Semiannual reports ^e	16	2	32	97.8	3129.6	156.48	312.96	\$338,480.32	
	TOTAL REPORTING BURDEN						3,262	163	326		
								3,751		\$352,848	
5.	RECORDKEEPING REQUIREMENTS										
	A.	Read instructions	-----Included in 4A-----								
	B.	Plan activities	-----Included in 4B-----								
	C.	Implement activities	-----Included in 4B-----								
	D.	Develop record system	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	E.	Time to enter and transmit information:									
		Records of daily monitoring of operations ^c	0.75	350	262.5	97.8	25,673	1,284	2,567	\$2,776,596.40	
		Records of daily emissions monitoring by a certified observer ^{d, g}	0.5	350	175	47.2	8,260	413	826	\$893,356.17	
		Records of COMS ^{f, h}	0.5	350	175	25.8	4,515	226	452	\$488,317.57	
		Records of BLDS ^{g, h}	0.5	350	175	12.9	2,258	113	226	\$244,158.78	
		Records of static furnace ^g	0.5	350	175	50.6	8,855	443	886	\$957,708.10	
	F.	Time to train personnel	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	G.	Time for audits	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	TOTAL RECORDKEEPING BURDEN						49,560	2,478	4,956		
								56,994		\$5,360,137	
	TOTAL LABOR BURDEN AND COST (rounded)						52,822	2,641	5,282	\$5,712,985	
								60,745			

Assumptions:

- ^a We have assumed that there are approximately 97.5 sources currently subject to the NSPS, Subparts AA and AAa. We have further assumed that one minimill will become subject to the standard over the three year period of this ICR (0.3 new respondents per year). Therefore, the average number of respondents per year is estimated to be 97.8 (rounded).
- ^b We have assumed that existing sources are in compliance with initial rule requirements including the initial performance test and notification requirements. We have assumed that 20 percent of the sources would repeat performance tests due to failure.
- ^c Daily monitoring of operations includes time and duration of each charge, time and duration of each tap, flow rate data and pressure data. In addition, sources are required to conduct monthly operational status checks of the equipment (e.g., physical appearance, pressure sensors, dampers, damper switches).
- ^d Daily emissions monitoring includes stack emissions monitoring using a continuous opacity monitor if the source has an EAF equipped with a direct shell evacuation system (DEC) and uses a negative pressure baghouse, and has not elected the alternative option. In addition, the source is required to conduct fugitive emissions monitoring using a furnace static pressure monitoring device or by electing to perform shop opacity observations using a certified visible emissions observer, if the source has an EAF equipped with a DEC.
- ^e Sources are required to provide semiannual reports of opacity observations and operational values (i.e., furnace static pressure, fan motor amperes) that exceed or are below (i.e, flow rates) those established during the performance test, and of all shop opacity observations in excess of the emission limit.
- ^f We have assumed that the new source will equipped its EAFs with a DEC system and use a positive pressure baghouse, and therefore, will not be required to install a continuous opacity monitor (COMS).
- ^g We have assumed that approximately 51.7 percent of the respondents (or 50.6 respondents) will choose to comply with the fugitive emissions monitoring requirements by measuring the furnace static pressure continuously and 48.3 percent (47.2 respondents) will choose the alternative option of daily opacity shop observations by a certified visible emission observer couple with the use of bag leak detection systems (BLDS).
- ^h We have assumed that approximately 40 percent of respondents (39.1) use negative pressure baghouses. Of these, 66 percent (25.8) use COMS to measure stack emissions and 33 percent (12.9) have elected to use the alternative option of using BLDS monitoring couple with visible emissions observations instead of using COMS.

TABLE 2: Average Annual EPA Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburiz (40 CFR part 60, subparts AA and AAa) (Renewal)

					\$45.52	61.36	24.64
REPORTING/RECORDKEEPING REQUIREMENT	(A) EPA Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year ^a	(E) Technical Hours per Year @ \$45.52 (E=C x D)	(F) Management Hours per Year @ \$61.36 (F= E x 0.05)	(G) Clerical Hours per Year @ \$24.64 (G= E x 0.1)
Notification of construction/modification	2	1	2	0.3	0.60	0.03	0.06
Notification of actual startup	1	1	1	0.3	0.3	0.015	0.03
Notification of performance test ^b	0.5	1.2	0.6	0.3	0.18	0.009	0.018
Initial performance test	24	1	24	0.3	7.2	0.36	0.72
Repeat Performance test ^b	24	0.2	4.8	0.3	1.44	0.072	0.144
Review Performance Test results ^b	8	1.2	9.6	0.3	2.88	0.144	0.288
Notification of COMS Demonstration	0.5	1	1	0.3	0.15	0.0075	0.015
Semiannual reports	8	2	16	97.8	1565	78.24	156.48
TOTAL ANNUAL HOURS					1578	79	158
TOTAL ANNUAL BURDEN					1,815		

Assumptions

^a We have assumed that there are approximately 97.5 sources currently subject to the NSPS, Subparts AA and AAa. We have further assumed that one minimill will over the three year period of this ICR (0.3 new respondents per year). Therefore, the average number of respondents per year is estimated to be 97.8 (rounded).

^b We have assumed that 20 percent of the sources would repeat performance tests due to failure.

ation Vessels

Costs per Year
\$30.63
\$15.32
\$9.19
\$367.57
\$73.51
\$147.03
\$7.66
\$79,886.17
\$80,537.08

become subject to the standard