SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Iron and Steel Foundries (40 CFR Part 63, Subpart EEEEE) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Iron and Steel Foundries (40 CFR Part 63, Subpart EEEEE) (Renewal),
EPA ICR Number 2096.04, OMB Control Number 2060-0543

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Iron and Steel Foundries (40 CFR part 63, subpart EEEEE) were proposed on December 12, 2002, (67 FR 78274), and promulgated on April 22, 2004, (69 FR 21905). The final rule was amended on May 20, 2005 (70 FR 29400) and on February 7, 2008 (73 FR 7210). Entities potentially affected by this rule are owners or operators of new and existing iron and steel foundries that are major sources of hazardous air pollutant (HAP) emissions. The rule applies to emissions from metal melting furnaces, scrap pre-heaters, pouring areas, pouring stations, automated conveyor and pallet cooling lines, automated shakeout lines, and mold and core making lines; and to fugitive emissions from foundry operations. This information is being collected to assure compliance with 40 CFR part 63, subpart EEEEE.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports. Owners or operators 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 sources subject to NESHAP. Semiannual summary reports are also required.

Any owner or operator subject to the provisions of this part will 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. 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.

EPA estimated that 98 of the 650 existing foundries are major sources that will be subject to the rule requirements. No new foundries are projected during the three-year period of this ICR.

All of the iron and steel foundries in the United States are owned and operated by the iron and steel industry (the "Affected Public"). None of the facilities in the United States are owned by state, local, tribal or the Federal government. These are all privately, owned for-profit businesses. The burden to the "Affected Public" is listed below in Table 1: Annual Respondent

Burden and Cost - NESHAP for Iron and Steel Foundries (40 CFR Part 63, Subpart EEEEE) (Renewal). The Federal government burden associated with the review of reports submitted by the respondent is shown below in Table 2: Average Annual EPA Burden - NESHAP for Iron and Steel Foundries (40 CFR Part 63, Subpart EEEEE) (Renewal).

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

2. Need for and Use of the Collection

2(a) Need/Authority for 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 HAP. These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. In addition, 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.

In the Administrator's judgment, particulate matter, and metal and organic hazardous air pollutant emissions from iron and steel foundries cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP standards were promulgated for this source category at 40 CFR part 63, subpart EEEEE.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. In addition, the collected information is 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 the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance tests, 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 the standard 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 ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, 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 continues to operate the control equipment in compliance with the regulation.

3. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart EEEEE.

3(a) Non-duplication

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 their own similar 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, no duplication exists.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (74 FR 32580) on July 8, 2009. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to

comment on the burden associated with the standard as it was being developed. We contacted the America Foundry Society at (202) 842-4864.

3(d) Effects of Less Frequent Collection

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.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 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 the five years. Without the five-year record retention, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

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 (CBI) (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).

3(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are iron and steel foundries. The North American Industry Classification System (NAICS) codes are listed below for each source category description.

Standard (40 CFR, part 63, subpart EEEEE)	NAICS Codes
Iron Foundries	331511
Steel Investment Foundries	331512
Steel Foundries	331513

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

In this ICR, all the data recorded or reported is required by the NESHAP for Iron and Steel Foundries (40 CFR part 63, subpart EEEEE).

A source must make the following reports:

Notifications	
Construction/reconstruction	63.5
Initial notifications	63.9(b), 63.7750
Initial performance test	63.7(b), 63.9(e)
Initial performance test results	63.10(d)(2)
Rescheduled initial performance test	63.7(b)(2)
Approval of smelters fugitive dust control standard operating procedures manual, and operating procedures manual for baghouses	63.549(b)
Demonstration of continuous monitoring system	63.9(g)
Compliance status	63.9(h)
Physical or operational change	63.9, 63.10
Periodic startup, shutdown, malfunction reports	63.10(d)(5)(i)
Semiannual, or as determined by the Administrator, monitoring/ exceedance summary	63.10(e)(3), 63.7751

A source must keep the following records:

Recordkeeping	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	63.6(e)(3), 63.7752(a)(2)
Records of performance test	63.7752(a)(3)

Recordkeeping	
All reports and notifications	63.10(b), 63.7752(a)(1)
Record of applicability	63.10(b)(3)
Records for sources with continuous monitoring systems	63.10(3), 63.7752(b)
Records to show compliance with emission limitation, work practices standard, and operation and maintenance requirements of parametric monitoring data, system maintenance and calibration	63.7752(c)
Records are required to be retained for five years, however, only the data of the most recent two years must be kept on-site	63.7753(c)

Electronic Reporting

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.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are not widely used. At this time, it is estimated that 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, operate and maintain baghouses, according to standard operating procedures manual and consistent with the manufacturer's instructions.
Perform initial performance test and repeat performance tests if necessary.
Monitor and record pressure drop and liquid supply pressure at the wet scrubber at least once every hour when using this control device for controlling particulate matter and metal HAP emissions from a process fugitive source.
Install, calibrate, maintain, and operate a CMS for temperature monitoring of the afterburner or the combined blast furnace and reverberatory furnace exhaust streams when complying with the total hydrocarbon emission standard.
Install, calibrate, maintain, and operate a total hydrocarbon CMS for measuring emissions when complying with the total hydrocarbon emission standard.
Equip pressurized drying bleaching seals with an alarm to determine seal malfunctions
Use referenced Methods in Appendix A, part 60, to determine compliance with the emission standards (i.e., Methods 1, 2, 3, 4 for stack PM testing; Method 18 for volatile organic HAP testing; Method 18 or Method 25 for total hydrocarbons testing)
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.
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.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., continuous parameter monitoring system). Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

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

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the OTIS.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operational. 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.

Information contained in the reports is entered into OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection,

maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. EPA edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner or operator for five years.

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden - NESHAP for Iron and Steel Foundries (40 CFR part 63, subpart EEEEE) (Renewal).

6. Estimating the Burden and Cost of the Collection

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. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 29,747 (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.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

Managerial	$100.99 ($48.09 + 110%)
Technical	$87.97 ($41.89 + 110%)
Clerical	$43.81 ($20.86 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December, 2005, "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.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard are 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 the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

Capital/Startup vs. Operation and Maintenance (O&M) Costs

(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/ Startup Cost (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Leak detectors	$9,000	0	$0	$1,470	98	$144,060
Flow rate monitors	$7,500	0	$0	$2,000	64	$128,000
pH monitor	$7,500	0	$0	$2,000	46	$92,000
Pressure drop	$7,500	0	$0	$2,000	18	$36,000
VOC CEM	$100,000	0	$0	$10,000	0	$0
Total			$0			$400,060

The total capital/startup costs for this ICR are zero. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $400,060. This is the total of column G.

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 $400,060.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA compliance and enforcement program includes activities such 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 cost during the three years of the ICR is estimated to be $53,274.

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

Managerial	$57.20 (GS-13, Step 5, $35.75 + 60%)
Technical	$42.45 (GS-12, Step 1, $26.53 + 60%)
Clerical	$22.96 (GS-6, Step 3, $14.35 + 60%)

These rates are from the Office of Personnel Management (OPM) 2006 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 - NESHAP for Iron and Steel Foundries (40 CFR Part 63, Subpart EEEEE) (Renewal).

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next three years, approximately 98 respondents will be subject to the standard. It is estimated that no new respondents per year will become subject. The overall average number of respondents, as shown in the table below is 98 per year.

The number of respondents is calculated using the following table which addresses the three years covered by this ICR.

Number of Respondents					
Year	(A) Number of New Respondents [1]	(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	98	0	0	98
2	0	98	0	0	98
3	0	98	0	0	98
Average	0	98	0	0	98

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

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 98.

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=(BxC)+D
Initial notification	0	0	0	0
Semiannual compliance reports	98	2	0	196
Startup, shutdown, malfunction reports	1	1	0	1
Total Number of Annual Responses			Total	197

The number of Total Annual Responses is 197.

The total annual labor costs are $2,519,459. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Iron and Steel Foundries (40 CFR Part 63, Subpart EEEEE) (Renewal).

6(e) Bottom Line Burden Hours Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 29,747. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for Iron and Steel Foundries (40 CFR Part 63, Subpart EEEEE) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 151 hours per response.

The total annual capital/startup and Operation and Maintenance (O&M) costs to the regulated entity are $400,060.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 906 labor hours at a cost of $53,274. See below Table 2: Annual Agency Burden and Cost – NESHAP for Iron and Steel Foundries (40 CFR Part 63, Subpart EEEEE) (Renewal).

6(f) Reasons for Change in Burden

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. In addition, there is no change in the cost burden. Since there are no changes in the regulatory requirements and there is no significant industry growth, the labor hours and cost figures in the previous ICR are used in this ICR and there is no change in burden to industry.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 151 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; to 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; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of information; to search data sources; to complete and review the collection of information; and to 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's regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2009-0404. An electronic version of the public docket is available at http://www.regulations.gov/ which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search" than key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, N.W., Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Enforcement and Compliance Docket and Information Center Docket is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0404 and OMB Control Number 2060-0543 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this

information.

Table 1: Annual Respondent Burden and Cost - NESHAP for Iron and Steel Foundries (40 CFR Part 63, Subpart EEEEE) (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 (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year [b]
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
a. Read rule and instructions [c]	2	1	2	0	0	0	0	$0
b. Required activities [c]								
Initial performance tests [d]	70	3.8	266	0	0	0	0	$0
Follow-up performance tests	70	0.8	266	0	0	0	0	$0
VOC CEMS performance tests [d]	N/A							
Startup, shutdown, malfunction plan	34	1	34	0	0	0	0	$0
Operation and maintenance plan	72	1	72	0	0	0	0	$0
Scrap selection/inspection plan [c]	10	1	10	0	0	0	0	$0
Scrap inspection [e]	0.5	350	175	98	17,150	857.5	1,715	$1,670,418.58
Monthly inspections of capture systems, maintenance of control devices and monitoring systems, and mould vent ignition plan	2	12	24	18	432	21.6	43.2	$42,077.02
c. Create information	See 3B							
d. Gather existing information	See 3B							
e. Write report								
Notification of applicability [c]	2	1	2	0	0	0	0	$0
Notification of construction/reconstruction [c]	2	1	2	0	0	0	0	$0
Notification of actual startup [c]	2	1	2	0	0	0	0	$0
Notification of special compliance requirements [c]	N/A							
Compliance extension request [c]	2	1	2	0	0	0	0	$0
Notification of performance test [c]	2	3.8	7.6	0	0	0	0	$0
Site-specific test plan [c]	20	3.8	76	0	0	0	0	$0
Notification of CEMS performance evaluation [c]	60	1	60	0	0	0	0	$0
CEMS QA plan [c]	40	1	40	0	0	0	0	$0

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 (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year [b]
Notification of compliance status [c]	8	1	8	0	0	0	0	$0
NESHAP waiver application	N/A							
Report of performance test	See 3B							
Semiannual compliance reports [f]	16	2	32	98	3,136	156.8	313.6	$305,447.97
Startup, shutdown, malfunction reports [g]	4	1	4	1	4	0.2	0.4	$389.60
Subtotal for Reporting Requirements						23,830.3		
4 Recordkeeping requirements								
a. Read instructions	See 3A							
b. Plan activities	3	1	3	0	0	0	0	$0
c. Implement activities [c]	12	1	12	0	0	0	0	$0
d. Develop record system [h]	3	1	3	0	0	0	0	$0
e. Time to enter information [i]	1	52	52	98	5,096	254.8	509.6	$496,352.95
f. Time to train personnel	3	2	3	0	0	0	0	$0
g. Time to adjust existing ways to comply with previously applicable requirements	N/A							
h. Time to transmit information [j]	0.25	2	0.5	98	49	2.45	4.9	$4,772.63
i. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						5,916.75		
					25,867	1,293.35	2,586.7	$2,519,458.75
TOTAL LABOR BURDEN AND COST (rounded)						29,747.05 29,747 (rounded)		$2,519,459

Assumptions:

[a] We have assumed that the average number of respondents that will be subject to this rule will be 98. There will be no new foundries projected during the next three years of this ICR.

[b] This ICR uses the following labor rates: $100.99 per hour for Executive, Administrative, and Managerial labor; $87.97 per hour for Technical labor, and $43.81 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December, 2005, 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.

[c] We have assumed that existing respondents are in compliance with the initial rule requirements. New respondents would have to comply with the initial rule requirements including notification and performance test for add-on control devices.

[d] Performance tests are required for particulate matter by Method 5 or total metal HAP by Method 29, for triethylamine by Method 18, and VOHAP by Method 18 or 25A, depending on the emission source. We have assumed that 20 percent of respondents would repeat performance tests due to failure.

[e] Monitoring and recordkeeping of operations for respondents with add-on control devices include: 1) specific operating parameters for each control device established during the performance test, 2) startup, shutdown, and malfunction of equipment, 3) work practices including an inspection of iron and steel scrap to minimize, to the extent practicable, the amount of organics and HAP metals in the charge materials used by the metal casting department.

[f] We have assumed that respondents are required to submit semiannual compliance reports.

[g] We have assumed that one respondent with add-on controls per year will have at least one startup, shutdown or malfunction (SSM) that is not managed according to the SSM plans.

[h] We have assumed that new respondents would of already have the technology and recordkeeping systems in place to monitor its daily operations and to comply with existing regulations.

[i] We have assumed that it will take each respondent one hour 52 times per year to enter information.

[j] We have assumed that it will take each of the respondents 15 minutes two times per year to transmit information.

Table 2: Average Annual EPA Burden - NESHAP for Iron and Steel Foundries (40 CFR Part 63, Subpart EEEEE) (Renewal)

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]	(E) Technical person-hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person-hours per year (Ex0.1)	(H) Cost, $ [b]
Initial performance test	40	1	40	0	0	0	0	$0
Repeat performance – retesting	40	1	40	0	0	0	0	$0
Report review [c]								
Notification of construction/reconstruction	N/A							
Notification of actual startup	N/A							
Notification of special compliance requirements	N/A							
Notification of applicability	2	1	2	0	0	0	0	$0
Notification of initial performance test	2	1	2	0	0	0	0	$0
Notification of CEMS performance evaluation	2	1	2	0	0	0	0	$0
CEMS QA plan	2	1	2	0	0	0	0	$0
Notification of compliance status	4	1	4	0	0	0	0	$0
Site-specific test plan	2	1	2	0	0	0	0	$0
Scrap selection/inspection plan	4	1	4	0	0	0	0	$0
Repeat performance test report	2	1	2	0	0	0	0	$0
Semiannual compliance reports [d]	4	2	8	98	784	39.2	78.4	$53,003.10
NESHAP waiver application	4	1	4	0	0	0	0	$0
Compliance extension request	4	1	4	0	0	0	0	$0
Scrap inspections	N/A							
Emergency startup, shutdown, and malfunction report [e]	4	1	4	1	4	0.2	0.4	$270.42
Subtotals Labor Burden and cost					788	39.4	78.8	$53,273.52
TOTAL ANNUAL BURDEN AND COST (rounded)						906.2 906 (rounded)		$53,274

Assumptions:

[a] We have assumed that the average number of respondents that will be subject to this rule will be 98. There will be no new foundries projected during the next three years 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: $57.20 Managerial rate (GS-13,

Step 5, $35.75 x 1.6), $42.45 Technical rate (GS-12, Step 1, $26.53 x 1.6), and $22.96 Clerical rate (GS-6, Step 3, $14.35 x 1.6). These rates are from the Office of Personnel Management (OPM) 2006 General Schedule which excludes locality rates of pay.

[c] We have assumed that existing respondents are in compliance with the initial rule requirements. New respondents would have to comply with the initial rule requirements including notification and performance test for add-on control devices.

[d] We have assumed that respondents are required to submit semiannual compliance reports

[e] We have assumed that one respondent with add-on controls per year will have one startup, shutdown or malfunction (SSM) that is not managed according to the SSM plans.