Table 1: Annual Respondent Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Argon Oxyg

REPORTING/RECORDKEEPING REQUIREMENT	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (A x B)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting Requirements			
A. Read and understand rule requirements	1	1	1
B. Required activities			
Initial Performance tests [c]	364	1	364
Repeat Performance tests [c]	364	0.2	72.8
Monitoring of operations and emissions [d, e]			----------
D. Gather Existing Information			----------
E. Write report			
Notification of construction/modification	2	1	2
Notification of actual startup	2	1	2
Notification of initial performance test	2	1	2
Reports of performance test results			----------
Semiannual reports [f]	16	2	32
Subtotal for Reporting Requirements			
4. Recording Requirements			
A. Read and understand rule requirements			----------
B. Plan activities			----------
C. Implement activities			----------
D. Develop record system	N/A		
E. Time to enter and transmit information:			
Records of daily monitoring of operations [d]	0.75	350	262.5
Records of daily emissions monitoring by a certified observer [e, h]	0.5	350	175
Records of COMS [g,i]	0.5	350	175
Records of BLDS [h, i]	0.5	350	175
Records of static furnace [h]	0.5	350	175
F. Time to train personnel	N/A		
G. Time for audits	N/A		
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded)[j]			
Total Capital/O&M Costs (rounded)[j]			
Grand Total (Labor and Capital/O&M Costs)(rounded)[j]			

Assumptions:

[a] We have assumed that there are approximately 99.3 sources currently subject to the NSPS, subparts AA and AAa. V three year period of this ICR (0.3 new respondents per year). Therefore, the average number of respondents per year is

[b] This ICR uses the following labor rates: Technical $103.97 ($49.51 + 110%); Managerial $129.93 ($61.87+ 110%); a of Labor, Bureau of Labor Statistics, June 2014, "Table 2. Civilian Workers, by occupational and industry group." The percent to account for the benefit packages available to those employed by private industry. This ICR assumes that Ma Technical hours.

[c] We have assumed that existing sources are in compliance with initial rule requirements including the initial performa would repeat performance tests due to failure.

[d] Daily monitoring of operations includes time and duration of each charge, time and duration of each tap, flow rate da status checks of the equipment (e.g., physical appearance, pressure sensors, dampers, damper switches).

[e] Daily emissions monitoring includes stack emissions monitoring using a continuous opacity monitor if the source has pressure baghouse, and has not elected the alternative option. In addition, the source is required to conduct fugitive em perform shop opacity observations using a certified visible emissions observer, it the source has an EAF equipped with

[f] Sources are required to provide semiannual reports of opacity observations and operational values (i.e., furnace static during the performance test, and of all shop opacity observations in excess of the emission limit.

[g] We have assumed that the new source will equipped its EAFs with a DEC system and use a positive pressure baghou

[h] We have assumed that approximately 51.7 percent of the respondents (or 51.49 respondents) will choose to comply w pressure continuously and 48.3 percent (48.11 respondents) will choose the alternative option of daily opacity shop obs systems (BLDS).

[i] We have assumed that approximately 40 percent of respondents use negative pressure baghouses. Of these, 66 percer the alternative option of using BLDS monitoring couple with visible emissions observations instead of using COMS.

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

;en Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal)

103.97 129.93 51.79

(D)	(E)	(F)	(G)	(H)
Number of Respondents per Year [a]	**Technical Hours per Year (C x D)**	**Management Hours per Year (E x 0.05)**	**Clerical Hours per Year (Ex0.1)**	**Total Labor Costs per Year, $ [b]**
99.6	99.6	4.98	9.96	$11,518.29
0.3	109.2	5.46	10.92	$12,628.49
0.3	21.84	1.09	2.18	$2,525.70
-----See 4E----------				
See 3B and 4E----------				
0.3	0.6	0.03	0.06	$69.39
0.3	0.6	0.03	0.06	$69.39
0.3	0.6	0.03	0.06	$69.39
-----See 3B----------				
99.6	3187.2	159.36	318.72	$368,585.34
		3,933		**$395,466**
-----See 3A----------				
-----See 3B----------				
-----See 3B----------				
99.6	26145	1307.25	2614.5	$3,023,551.60
48.11	8419.25	420.96	841.93	$973,648.38
26.29	4600.75	230.04	460.08	$532,056.03
13.15	2301.25	115.06	230.13	$266,129.21
51.49	9010.75	450.54	901.08	$1,042,052.69
		58,049		**$5,837,438**
		62,000		**$6,230,000**
				$203,000
				$6,430,000

310

We have further assumed that one minimill will become subject to the standard over the estimated to be 99.6 (rounded).

and Clerical $51.79 ($24.66 + 110%). These rates are from the United States Department e rates are from column 1, “Total compensation.” The rates have been increased by 110 nagerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of

nce test and notification requirements. We have assumed that 20 percent of the sources

ta and pressure data. In addition, sources are required to conduct monthly operational

s an EAF equipped with a direct shell evacuation system (DEC) and uses a negative
issions monitoring using a furnace static pressure monitoring device or by electing to
a DEC.

pressure, fan motor amperes) that exceed or are below (i.e, flow rates) those established

ıse, and therefore, will not be required to install a continuous opacity monitor (COMS).

vith the fugitive emissions monitoring requirements by measuring the furnace static
servations by a certified visible emission observer couple with the use of bag leak detection

nt (26.29) use COMS to measure stack emissions and 33 percent (13.15) have elected to use

hr/response

Table 2: Average Annual EPA Burden and Cost – NSPS for Steel Plants: Electric Arc Furnaces and Ar

REPORTING/RECORDKEEPING REQUIREMENT	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Plant Per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year [a]
Notification of construction/modification	2	1	2	0.3
Notification of actual startup	1	1	1	0.3
Notification of performance test [c]	0.5	1.2	0.6	0.3
Initial performance test	24	1	24	0.3
Repeat Performance test [c]	24	0.2	4.8	0.3
Review Performance Test results [c]	8	1.2	9.6	0.3
Notification of COMS Demonstration	0.5	1	0.5	0.3
Semiannual reports	8	2	16	99.6
TOTAL ANNUAL BURDEN and COST (rounded)[d]				

Assumptions

[a] We have assumed that there are approximately 99.3 sources currently subject to the NSPS, Subparts AA and A subject to the standard over the three year period of this ICR (0.3 new respondents per year). Therefore, the ave (rounded).

[b] This cost is based on the average hourly labor rate as follows: Technical $40.87 (GS-12, Step 1, $25.17 + 60% Clerical $25.25 (GS-6, Step 3, $15.78 + 60%). This ICR assumes that Managerial hours are 5 percent of Techn hours. These rates are from the OPM, 2012 General Schedule, which excludes locality rates of pay. The rates l

[c] We have assumed that 20 percent of the sources would repeat performance tests due to failure.

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

·gon Oxygen Decarburization Vessels (40 CFR Part 60, Subparts AA and AAa) (Renewal)

46.67 62.9 25.25

(E)	(F)	(G)	(H)
Technical Hours per Year (CxD)	**Management Hours per Year(Ex0.05)**	**Clerical Hours per Year (Ex0.1)**	**Costs per Year, $ [b]**
0.6	0.03	0.06	$31.40
0.3	0.02	0.03	$15.70
0.18	0.01	0.02	$9.42
7.2	0.36	0.72	$376.85
1.44	0.07	0.14	$75.37
2.88	0.14	0.29	$150.74
0.15	0.01	0.02	$7.85
1593.6	79.68	159.36	$83,409.02
1,850			**$84,100**

AAa. We have further assumed that one minimill will become
·rage number of respondents per year is estimated to be 99.6

ıical hours, and Clerical hours are 10 percent of Technical
have been increased by 60 percent to account for the benefit