SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR) (Renewal), EPA ICR Number 2050.06, OMB Control Number 2060-0538.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR) were proposed on December 18, 2002, promulgated on October 30, 2003, and amended on April 20, 2006. These regulations apply to existing and new taconite iron ore processing facilities that emit or have the potential to emit a single hazardous air pollutant (HAP) at a rate of 10 tons or more per year or any combination of HAPs at a rate of 25 tons or more per year. The effective sources in this Subpart covers emissions from ore crushing and handling emission units, ore dryer stacks, indurating furnace stacks, finished pellet handling emission units, and fugitive dust emissions. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart RRRRR.

In general, all NESHAP standards require initial notification reports, performance tests, and periodic reports by the owners/operators of the affected facilities. They 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 affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents, and retain the file for at least five years following the generation date of such 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 U.S. Environmental Protection Agency (EPA) regional office.

There are approximately 8 facilities, which are owned and operated by the taconite iron ore processing industry (known as the "Affected Public"). Of these 8 facilities, 3 facilities are idle, 1 is partly idle, and 4 are operating with 1 expected to shut down in 2016[1]. None of these facilities in the United States are owned by either state, local, tribal or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. The "burden" to the

1 Operation at Northshore, United Taconite (UTAC) and Keetac have been idled; operations at Minntac are partially idled; and Empire, Tilden, Hibbing and Arcelormittal are operational with operations at Empire expected to be shut down in 2016.

Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR) (Renewal). The Federal Government's "burden" is attributed entirely to work performed by either Federal employees or government contractors and can be found below in Table 2 below: Average Annual EPA Burden and Cost – NESHAP for Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR) (Renewal).

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately 4 respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. This estimate is based on industry-specific information that indicates approximately half of the eight facilities are not currently in operation.

The Office of Management and Budget (OMB) approved the currently active 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 hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/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, HAP emissions from taconite iron ore processing plants either cause or contribute to air pollution that may reasonably be anticipated to endanger public

health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart RRRRR.

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. The collected information is also 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 standards. Continuous emission monitors are used to ensure compliance with these standards at all times. During the performance test 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 these 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. 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.

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

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart RRRRR.

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 its 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, duplication does not exist.

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 (80 FR 32116) on June 5, 2015. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. 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 these standards as they were being developed and that the standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both: 1) the National Mining Association, at (202) 463-2600; and 2) the Iron Mining Association of Minnesota, at (218) 722-7724.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

3(d) Effects of Less Frequent Collection

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these 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

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 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 five years. In addition, 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

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are taconite iron ore processing facilities. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 1011, which corresponds to North American Industry Classification System (NAICS) code 212210 for Iron Ore Mining.

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR).

A source must make the following reports:

Notifications/Reports	
Initial notification	63.9640(a)-(c), 63.9(b)
Notification of intent to conduct a performance test	63.9640(d), 63.7(b)(1)
Notification of compliance status	63.9640(a),(e), 63.9(h)
Request to conduct a new performance test	63.9622(f)
Semiannual compliance report	63.9641(a),(b), 63.8(c)(7)-(8), 63.10(e)(3)
Startup, shutdown, or malfunction report	63.9641(c), 63.10(d)(5)(ii)

Notifications/Reports	
Corrective action report	63.9641(e)

A source must keep the following records:

Recordkeeping	
Notifications and reports	63.9642(a)(1), 63.10(b)(2)(xiv)
Startups, shutdowns or malfunctions, periods where the continuous monitoring system is inoperative.	63.9642(a)(2), 63.6(e)(3)(iii)-(v)
Performance tests	63.9642(a)(3), 63.10(b)(2)(viii)
Records for continuous opacity monitoring system (COMS)	63.9642(b), 63.10(b)(2)(vi)-(xi), 63.6(h)(7)(i)-(ii), 63.8(d)(3)
Records required to demonstrate continuous compliance	63.9642(c), 63.10(b)(2)(vii)

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.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 5, 5D, or 17 tests, and repeat performance tests if necessary.
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.

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
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 ICIS.

5(b) Collection Methodology and Management

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 standards. 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.

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

5(c) Small Entity Flexibility

There are no small entities (i.e., small businesses) affected by this regulation.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR) (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. Where 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 276 hours (Total Labor Hours from Table 1 below). 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

This ICR uses the following labor rates:

Managerial	$129.93 ($61.87+ 110%)
Technical	$103.97 ($49.51 + 110%)
Clerical	$51.79 ($24.66 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2014, "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 both 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(s) 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)
Scrubbers	$150,000	0	$0	$12,900	4	$51,600
Baghouses	$225,000	0	$0	$19,300	4	$77,200
Contractor Method 5 PM tests[1]	$0	0	$0	$42,167	4	$168,668
Total[2]			**$0**			**$298,000**

[1] We have assumed that over the three years of this ICR, contractors will complete the following performance tests: (27 indurating furnaces and ore dryer Method 5 PM tests @$8,000/test) + (58 OCH and PH Method 5 PM tests @ $5,000/test) for a total of $506,000 for three years. Therefore, the average contractor costs will be $168,668 per year ($506,000/3 years).

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

The total capital/startup costs for this ICR are $0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $298,000. 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 $298,000. These are the recordkeeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall 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 $2,680.

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

Managerial	$62.90 (GS-13, Step 5, $39.31 + 60%)
Technical	$46.67 (GS-12, Step 1, $29.17 + 60%)
Clerical	$25.25 (GS-6, Step 3, $15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2014 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 Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR) (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 4 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 4 per year.

The number of respondents is calculated using the following table that addresses the three 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 [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	4	0	0	4
2	0	4	0	0	4
3	0	4	0	0	4
Average		4			4

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

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 4.

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	1	0	0
Compliance extension requests	0	1	0	0
Site-specific test plan	0.32	1	0	0.32
Operation and maintenance plan	0	1	0	0
Fugitive dust emission control plan	0	1	0	0
Site-specific monitoring plan	0	1	0	0
Semiannual compliance reports	4	2	0	8
Petition for alternative monitoring requirements	0	1	0	0
Notification of performance tests	1.6	3	0	4.8
			Total	13

The number of Total Annual Responses is 13 (rounded).

The total annual labor costs are $27,800. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Taconite Iron Ore

Processing (40 CFR Part 63, Subpart RRRRR) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

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

(i) Respondent Tally

The total annual labor hours are 276 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR) (Renewal).

We assume that burdens for managerial tasks take 5% 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% 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 21 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $298,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 59 labor hours at a cost of $2,680. See below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR) (Renewal).

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

6(f) Reasons for Change in Burden

There is an adjustment decrease in the respondent labor hours and the number of responses as currently identified in the OMB Inventory of Approved Burdens. The decrease is due to a decline in the number of respondents. The previous ICR estimated eight functioning facilities. Recent industry information indicates that only half of these facilities are currently in operation.

There is, however, an adjustment increase in the respondent O&M costs. There is not an

actual increase in cost; rather, the increases occurred because this ICR accounts for contractor costs associated with Method 5 PM tests as an O&M cost, while the previous ICR accounted for this cost as a labor cost.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 21 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.

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-2012-0693. 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 contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then 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), WJC West, Room 3334, 1301 Constitution Ave., NW, 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 docket center 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, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2012-0693 and OMB Control Number 2060-0538 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 Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR) (Renewal)

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=AxB)	(D) Number of Respondents per Year [a]	(E) Technical Hours per Year (E=CxD)	(F) Management Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Total Labor Costs per Year [b]
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
A. Familiarize with regulatory requirements [c]	2	1	2	4	8	0.4	0.8	$925.16
B. Required activities								
Performance test – facility labor [e]	40	1	40	1.6	64	3.2	6.4	$7,401.31
Startup , shutdown, and malfunction plan	40	1	40	1.6	64	3.2	6.4	$7,401.31
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write reports								
Initial notification [d]	2	1	2	0	0	0	0	$0
Compliance extension request [d]	2	1	2	0	0	0	0	$0
Site-specific test plan [f]	40	1	40	0.32	12.8	0.64	1.28	$1,480.26
Operation and maintenance plan [d, g]	40	1	40	0	0	0	0	$0
Fugitive dust emission control plan [d, h]	20	1	20	0	0	0	0	$0
Site-specific monitoring plan [d, i]	80	1	80	0	0	0	0	$0
Semiannual compliance reports	8	2	16	4	64	3.2	6.4	$7,401.31
Petition for alternative monitoring requirements	40	1	40	0	0	0	0	$0
Notification of performance test [j]	4	3	12	1.6	19.2	0.96	1.92	$2,220.39

Subtotal for Reporting Requirements					**267**			**$26,830**
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements [c]	See 3A							
B. Plan activities	3	1	3	0	0	0	0	$0
C. Develop record system	16	1	16	0	0	0	0	$0
D. Time to train personnel	3	1	3	0	0	0	0	$0
E. Time to transmit or disclose information	1	2	2	4	8	0.4	0.8	$925.16
F. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					**9**			**$925**
Total Labor Burden and Cost (rounded)[k]					**276**			**$27,800**
Total Capital and O&M Costs (rounded)[k]								**$298,000**
Grand Total (rounded)[k]								**$326,000**

Assumptions:

[a] We have assumed that the average number of respondent that will be subject to the rule will be the eight existing respondents. There will be no additional new sources per year that will become subject to the rule over the three-year period of this ICR.

[b] This ICR uses the following labor rates: Technical $103.97 ($49.51 + 110%); Managerial $129.93 ($61.87+ 110%); and Clerical $51.79 ($24.66 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2014, "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. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

[c] This ICR assumes all respondents will have to familiarize with the regulatory requirements each year.

[d] This is a one-time activity.

[e] We have assumed that it will take 40 hours for each facility to complete performance test, and that performance tests are repeated every two of five years. Therefore, an average of 3.2 facilities per year will complete performance tests (2 performance test/5 years*8 facilities).

[f] We have assumed that 20 percent of all sources will send in a site-specific test plan.

[g] We have assumed that each respondent will take 40 hours to write the operation and maintenance plan.

[h] We have assumed that each respondent will take 20 hours to write the fugitive dust emission control plan.

[i] We have assumed that each respondent will take 80 hours to complete the site-specific monitoring plan report.

[j] We have assumed that each respondent will take 4 hours to complete the notification of performance test report.

[k] 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 Taconite Iron Ore Processing (40 CFR Part 63, Subpart RRRRR)

Burden Item	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Plant per Year (C=AxB)	(D) Plants per Year [a]	(E) Technical Hours per Year (E=CxD)	(F) Management Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Costs per Year ($) [b]
Initial performance tests [c, d]	8	7	56	0	0	0	0	$0
Report Review								
Initial notification [c]	2	1	2	0	0	0	0	$0
Notification of initial performance test [c]	2	3	6	0	0	0	0	$0
Fugitive dust emissions control plan[e]	10	1	10	0	0	0	0	$0
Compliance extension request	2	1	2	0	0	0	0	$0
Site-specific test plan [f]	10	1	10	0.32	3.2	0.16	0.32	$167.49
Operation and maintenance plan [c, f]	10	1	10	0	0	0	0	$0
Site-specific monitoring plan [c, f]	10	1	10	0	0	0	0	$0
Petition for alternative monitoring requirements	5	1	5	0	0	0	0	$0
Review of semiannual compliance report	4	2	8	4	32	1.6	3.2	$1,674.88
Review of startup, shutdown, and malfunction plan [g]	10	1	10	1.6	16	0.8	1.6	$837.44
Total Labor Burden and Cost (rounded)[h]					**59**			**$2,680**

Assumptions:

[a] We have assumed that the average number of respondents that will be subject to the rule will be the eight existing respondents. There will be no additional new sources per year that will become subject to the rule over the three-year period of this ICR.

[b] This cost is based on the average hourly labor rate as follows: Technical $46.67 (GS-12, Step 1, $29.17 + 60%); Managerial $62.90 (GS-13, Step 5, $39.31 + 60%); and Clerical $25.25 (GS-6, Step 3, $15.78 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the OPM, 2014 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.

[c] This is a one-time only activity.

[d] We have assumed that the initial performance test/occurrences per respondent are based on the following: (27 indurating furnaces and ore dryer Method 5 PM tests + 58 OCH and PH Method 5 PM tests) for a total of 85 Method 5 PM tests over three years. 85 tests/3 years = 28 Method 5 PM tests/year. (28 Method 5 PM tests/year)/(4 plants) = 7 Method 5 PM tests per year per plant.

[e] We have assumed that each of the fugitive dust emissions control plan will be unchanged.

[f] We have assumed that it will take each respondent 10 hours to review the plan.

[g] We have assumed that 40 percent of respondents will submit startup, shutdown, and malfunction plan/reports.

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