

Table 1: Annual Respondent Burden and Cost – NESHAP for Taconite Iron Ore Processing

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting Requirements			
A. Familiarize with regulatory requirements ^c	2	1	2
B. Required activities			
Performance test – facility labor ^e	40	1	40
Startup, shutdown, and malfunction plan	40	1	40
C. Create information	See 4B		
D. Gather existing information	See 4B		
E. Write reports			
Initial notification ^d	2	1	2
Compliance extension request ^d	2	1	2
Site-specific test plan ^f	40	1	40
Operation and maintenance plan ^{d, g}	40	1	40
Fugitive dust emission control plan ^{d, h}	20	1	20
Site-specific monitoring plan ^{d, i}	80	1	80
Semiannual compliance reports	8	2	16
Petition for alternative monitoring requirements	40	1	40
Notification of performance test ^j	4	3	12
Subtotal for Reporting Requirements			
4. Recordkeeping requirements			
A. Familiarize with regulatory requirements ^c	See 3A		
B. Plan activities	3	1	3
C. Develop record system	16	1	16
D. Time to train personnel	3	1	3
E. Time to transmit or disclose information	1	2	2
F. Time for audits	N/A		
Subtotal for Recordkeeping Requirements			
Total Labor Burden and Cost (rounded) ^k			
Total Capital and O&M Cost (rounded) ^k			
Grand Total (rounded) ^k			

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be seven (the eight existing sources plus one additional new source 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: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$109.10 per hour for Professional labor; and \$78.80 per hour for Unskilled labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, “Table 2. Civilian Workers’ Compensation and Benefits by Industry, Sex, Race, and Education, 2017.” The rates have been increased by 110% to account for the benefit packages available to respondents.

^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 per year will complete performance tests (2 performance test/5 years*7 facilities).
- ^f We have assumed that 20 percent of all sources conducting performance tests 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.

ing (40 CFR Part 63, Subpart RRRRR) (Renewal)

(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
7	14	0.7	1.4	\$1,833.89
2.8	112	5.6	11.2	\$14,671.10
2.8	112	5.6	11.2	\$14,671.10
0	0	0	0	\$0
0	0	0	0	\$0
0.56	22.4	1.12	2.24	\$2,934.22
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
7	112	5.6	11.2	\$14,671.10
0	0	0	0	\$0
2.8	33.6	1.68	3.36	\$4,401.33
		467		\$53,183
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
7	14	0.7	1.4	\$1,833.89
		16		\$1,834
		483		\$55,000
				\$521,000
				\$576,000

Labor Rates:	
Management	\$147.40
Technical	\$117.92
Clerical	\$57.02

21
hr/response

existing respondents, less the one facility that is idle). There will be no

117.92 per hour for Technical labor, and \$57.02 per hour for Clerical labor.
ian Workers, by Occupational and Industry group.” The rates are from column
those employed by private industry.

ests are repeated every two of five years. Therefore, an average of 2.8 facilities

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Table 2: Average Annual EPA Burden and Cost – NESHAP for Taconite Iron Ore Processin

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)
Initial performance tests ^{c, d}	8	7	56	0	0
Report Review					
Initial notification ^c	2	1	2	0	0
Notification of initial performance test ^c	2	3	6	0	0
Fugitive dust emissions control plan ^e	10	1	10	0	0
Compliance extension request	2	1	2	0	0
Site-specific test plan ^f	10	1	10	0.56	5.6
Operation and maintenance plan ^{c, f}	10	1	10	0	0
Site-specific monitoring plan ^{c, f}	10	1	10	0	0
Petition for alternative monitoring requirements	5	1	5	0	0
Review of semiannual compliance report	4	2	8	7	56
Review of startup, shutdown, and malfunction plan ^g	10	1	10	2.8	28
Total (rounded) ^h					

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be seven (the eight existing sources that are currently subject to the rule, minus one that is idle). There will be no additional new sources per year that will become subject to the rule over the three-year period.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), and a 3, \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which is used for the cost estimates.

^c This is a one-time only activity. We assume that EPA will not attend the performance tests that are repeated every two years.

^d We have assumed that the initial performance test/occurrences per respondent are based on the following: (47.25 initial Method 5 PM tests + 101.5 OCH and PH Method 5 PM tests) for a total of 149 Method 5 PM tests for three years. 149 tests/year. (50 Method 5 PM tests/year)/(7 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 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.

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(F) Management Hours per Year (F=Ex0.05)	(G) Clerical Hours per Year (G=Ex0.1)	(H) Costs per Year (\$) ^b
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0.28	0.56	\$306.17
0	0	\$0
0	0	\$0
0	0	\$0
2.8	5.6	\$3,061.72
1.4	2.8	\$1,530.86
103		\$4,900

Labor Rates:	
Management	\$65.71
Technical	\$48.75
Clerical	\$26.38

isting respondents, less the one facility period of this ICR.

government overhead expenses:
nd Clerical rate of \$26.38 (GS-6, Step 1 excludes locality rates of pay.

wo of five years.

lurating furnaces and ore dryer
9 tests/3 years = 50 Method 5 PM

Capital/Startup vs. Operation and Maintenance (O&M) Costs				
(A)	(B)	(C)	(D)	(E)
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
Scrubbers	\$150,000	0	\$0	\$12,900
Baghouses	\$225,000	0	\$0	\$19,300
Contractor Method 5 PM tests ¹	\$0	0	\$0	\$42,167
Total²			\$0	

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
			Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses
Information Collection Activity	Number of Respondents	Number of Responses		E=(BxC)+D
Initial notification	0	1	0	0
Compliance extension requests	0	1	0	0
Site-specific test plan	0.56	1	0	0.56
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	7	2	0	14
Petition for alternative monitoring requirements	0	1	0	0
Notification of performance tests	2.8	3	0	8.4
			Total	22.96

(F)	(G)
Number of Respondents with O&M	Total O&M,
	(E X F)
7	\$90,300
7	\$135,100
7	\$295,169
	\$521,000