

PART A OF THE SUPPORTING STATEMENT

1. Identification of the Information Collection

(a) *Title and Number of the Information Collection.*

"Information Collection Request for Iron and Steel Foundries." This is a new information collection request (ICR), and the EPA ICR number is 1809.01. It is an information collection for regulatory development that follows the screening survey approved under OMB Number 2060-0239.

(b) *Short Characterization.*

This information collection for iron and steel foundries was prepared by EPA's Emission Standards Division (ESD) in the Office of Air Quality Planning and Standards. Respondents are owners or operators of iron and steel foundries, which were listed as two separate source categories under the Clean Air Act (CAA) on July 16, 1992 (57 FR 31576). The Clean Air Act requires that final regulations be developed for both source categories by November 15, 2000.

This survey was developed specifically for foundries rather than using the generic survey that was developed for all source categories and was previously approved under OMB number 2060-0239 because of the complexity of the industry. This information collection has been tailored to the processes at foundries and uses an approach that will be less burdensome than the generic survey for both the facilities that must respond and for EPA personnel who must compile the responses. Its development is based in part on responses to surveys of other source categories when the generic form was used, and it incorporates improvements over the generic survey to provide more directly information that is needed to develop standards. Respondents are asked to complete simple forms from available information, and no request is made to create or develop emission estimates from information in the literature. The generic survey was estimated to require 85 technical hours (\$2,800) for a typical respondent to complete;

in comparison, this tailored substitute for the generic survey is estimated to require 24 total hours (\$770) per facility to complete based on responses from foundries operated by eight companies that evaluated the survey during pretesting.

Information is requested from 742 iron and steel foundries on types of production facilities, production capacity, emission control devices in place and their basic design and operating features, quantity of air emissions, and pollution prevention programs at each plant. This information is necessary to develop maximum achievable control technology (MACT) standards for new and existing foundries as required under section 112 of the Clean Air Act. The information will be collected from the completion of simple forms, which will be used to develop a computer data base. The completed forms and the computer data base will become part of the rulemaking docket.

2. Need For and Use of the Collection

(a) *Need/Authority for the Collection.*

The EPA is charged under section 112 of the Act with developing national emission standards for 189 listed hazardous air pollutants (HAP). Preliminary information indicates that there are major sources of HAP in the iron and steel foundry source categories. These categories were listed pursuant to section 112(c) of the Act on July 16, 1992, and section 112(d) of the Act requires the Administrator to promulgate regulations establishing emission standards for this source category. Standards must be promulgated by November 15, 2000. The information is being collected under the authority of section 114 of the Act.

The information collection is needed to develop the required regulations based on determinations of the MACT floor (the least stringent level allowable for the standard) for existing sources, MACT (the level of the promulgated standard) for existing sources, and MACT for new sources. The information is also

needed to determine major sources of HAP emissions and to estimate impacts, including emissions, emission reduction, cost, and economic effects.

(b) *Practical Utility/Users of the Data.*

The Emission Standards Division (ESD) of the Office of Air Quality Planning and Standards uses the information on emission control technology in place and its performance to develop legally defensible MACT standards. The focus of the information collection is on determinations of HAP emissions, emission controls, and control performance, which are critical elements in the development of technology-based standards. Other questions in the survey provide information that ESD will use to develop reasonable estimates of impacts associated with potential standards, including emission reductions, cost, and economic impacts.

Specifically, the information will be used by ESD to develop estimates of emissions of hazardous air pollutants (HAP), make determinations with respect to probable "major" sources, and develop MACT standards for both new and existing foundries. The data base compiled from the results will be used to make a determination of the MACT floor for existing sources based on the average emission limitation achieved by the best-performing 12 percent of sources. The results will also aid in identifying the best controlled sources for a determination of MACT for new foundries. In addition, the data base will be invaluable to make defensible estimates of the impacts of the standards, including emissions and emission reductions, costs of control options and their cost effectiveness, and economic impacts. This analysis is critical to establish MACT for existing sources, which cannot be less stringent than the MACT floor and may be more stringent, based on considerations of cost, non-air quality health and environmental impacts, and energy requirements.

Information is also requested to identify pollution prevention methods that are used by the facilities for consideration in the development of standards. Section 112(d)(2) of the Act requires that the Administrator promulgate standards through the application of several measures, including measures that:

"(A) reduce the volume of, or eliminate emissions of, such pollutants through process changes, substitution of materials or other modifications,

(B) enclose systems to eliminate emissions..."

3. Nonduplication, Consultations, and Other Collection Criteria

(a) Nonduplication.

A search of EPA's ongoing information collections revealed no duplication of information-gathering efforts, and the information that will be requested is not available through other sources.

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

The Federal Register notice was published on June 3, 1997.

(c) Consultations.

A review of this information collection was made by and comments were received from the American Foundrymen's Society (AFS), the industry's major trade association. In addition, the EPA conducted a briefing at the AFS 8th Environmental, Health, and Safety Conference to explain how to fill out the simple forms, to clarify that it relies only on available information, and to answer any questions or concerns from the respondents.

The survey was pretested by mailing the information collection request to eight companies, who filled out the survey for a total of 12 foundries. The companies provided comments, and final minor revisions to the survey were made. In general, the respondents found the forms to be clearly presented and easy to fill out. Their estimates of the total labor hours to

respond, including technical, management, and clerical hours, ranged from 4 to 64 hours with an average of 24 hours (compared to an estimate of 85 hours for the previously-approved generic survey that this information collection replaces).

(d) *Effects of Less Frequent Collection.*

Not applicable because this is a one-time request.

(e) *General Guidelines.*

None of the guidelines in 5 CFR 1320.6 are being exceeded.

(f) *Confidentiality.*

All 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 (See 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 8, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

(g) *Sensitive Questions.*

This section is not applicable because this survey does not involve matters of a sensitive nature.

4. *The Respondents and the Information Requested*

(a) *Respondents/SIC Codes.*

Respondents are owners or operators of existing iron and steel foundries. The SIC codes for the respondents include 3321 (gray iron foundries), 3322 (malleable iron foundries), 3324 (steel investment foundries), and 3325 (steel foundries, not elsewhere classified). A total of 742 iron and steel foundries have been identified to receive this survey.

(b) *Information Requested.*

(i) *Data items, including recordkeeping requirements.* A copy of the survey is provided as Attachment 1. There are no recordkeeping requirements associated with this request. Information is requested from each respondent on types of production processes and their capacity, air emissions from these

processes, identification of capture and control devices for air emissions, basic design and operating features of these devices, and pollution prevention techniques that are used. **Part I (Instructions)** provides guidance to the respondent and highlights that no additional monitoring or testing is required to respond to the request. The instructions also list an EPA contact for questions and provide the name and address to which the completed survey should be mailed. The instructions also direct the respondent to an attachment that provides additional information on the scope and purpose of the information collection and the relevant requirements of the Clean Air Act. **Part II (General Information)** is where the respondent (plant contact person), company, and plant are identified. In addition, information is requested on the number of employees to identify small businesses, which will aid in determining the impacts of potential standards on small businesses. **Part III (Foundry Operations)** requests that the respondent fill out tables for each process of interest to briefly characterize each process, its capacity, the type of air pollution control device that is used, and any available data on emission measurements. When an air pollution control device is used, the respondent is asked to fill out a table that characterizes the control device.

(ii) Respondent activities. The respondent activities include reading the instructions, planning and gathering available data from files, processing and reviewing the information, and completing the written forms. The request does not require respondents to make measurements of emissions or otherwise create information, and it relies on information that should be readily available to the respondent. Consequently, it is consistent and compatible with existing reporting and recordkeeping requirements because the survey asks only for this existing information. There is no need for respondents to

develop or acquire technology or systems to collect, process, or disclose the information.

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

(a) Agency Activities.

Agency activities associated with the information collection include preparing the questionnaire, answering respondent questions about the questionnaire, reviewing data submissions, addressing requests for confidentiality, and entering the data into a database.

(b) Collection Methodology and Management.

The generic survey that was previously approved by OMB was pretested by mailing to eight companies for completion, and the results were used to refine the survey and estimate respondent burden. The generic survey form was then modified based on the data the respondents supplied and their comments on the contents of the survey, its format, and the time that was required to complete it. The evolution of a more refined survey continued as the results from the generic surveys for other source categories were reviewed, and based on the review and comments from respondents, this tailored survey was developed. This survey was designed to be much less burdensome for the respondent than the generic survey that it replaces, to provide a clearer focus for the respondent on the specific and readily available information that is requested, and to provide the results to EPA in a format that will facilitate entry of the information into a master data base. This survey was pretested by mailing it to eight companies who evaluated it by filling out the survey for a total of 12 foundries. These companies provided comments on the survey and estimates of the burden to respond to it.

For this information collection, the submissions will be monitored for completeness, and follow-up calls will be made to maximize the response rate. Confidential information will be

maintained in secure locations as required by procedures for handling confidential business information (CBI). CBI will not be entered into the computer data base. Public access to non-CBI information will be provided through the rulemaking docket, which will contain the survey responses and a copy of the resulting data base.

(c) *Small Entity Flexibility.*

In developing this information request, ESD considered whether a separate request or no request for information should be made to small facilities. A major consideration was that the burden of responding to the questionnaire is not excessive for small facilities. Because they have fewer and simpler processes, smaller facilities will require less time to prepare a response than larger facilities. The information requested from the smaller facilities should be readily available, and no requests are made to perform measurements or to create information. For example, one small facility required only 4 hours to respond to the survey when it was pretested and another required only 5 hours (compared to an average of 24 hours for the foundries that were pretested).

Many of the iron and steel foundries meet the definition of small businesses (e.g., companies with fewer than 100 employees total at all facilities), and information from small entities is important to this regulatory development. The information collected from small entities will improve the analyses that must be performed to assess the economic impact of a potential MACT standard on them. A Regulatory Flexibility Analysis must be performed under the Regulatory Flexibility Act of 1980 if a proposed regulation will have a significant economic impact on a substantial number of small entities. The information from small entities will also assist in addressing the requirements of the Small Business Regulatory Enforcement Fairness Act of 1996.

Although many of these small businesses are not likely to be major sources of HAP emissions, information on emissions and the level of control performance achieved is needed from all plants in the industry to determine with reasonable accuracy the "average emission limitation achieved" by the top-performing 12 percent of sources. The coverage of small plants is especially important if any are in this top 12 percent.

In addition, the best controlled sources may include some of the smaller facilities, which would affect the determination of MACT for new foundries. Information on the smaller facilities will aid in determining if a facility size cutoff is warranted, and if so, which of the smaller facilities should be exempt from the MACT standard. The information on small facilities will also provide insight into pollution prevention measures that might be applicable to larger facilities. Even if the smaller facilities are not major sources, the information from their responses to the survey will be useful in determining if they are significant area sources that may warrant regulation.

(d) Collection Schedule.

The proposed mailing date for the survey is _____. Approximately 6 weeks are given for the respondents to reply. The data base will be created and checked by quality assurance procedures by _____. The data will be used to develop MACT standards with proposal targeted for November 1999 and promulgation in November 2000.

6. Estimating the Burden and Cost of the Collection

(a) Estimating Respondent Burden.

The annual burden estimates for collecting and reporting information requested in the survey were derived from estimates provided from the facilities that participated in the pretesting of the survey. The estimates from eight companies who completed the survey forms for 12 foundries ranged from 4 hours for a small foundry to 64 hours for a large corporation. The average burden

was 24 hours, which includes technical, management, and clerical labor. The distribution of technical hours for each activity for a typical respondent is shown in the second column of Table 1. These activities include reading the instructions, searching for data, completing the survey forms, and transmitting the information.

(b) *Estimating Respondent Costs.*

The information collection activities and estimated costs for all respondents are presented in Table 1. The costs are based on hourly rates estimated as follows: technical at \$33, management at \$49, and clerical at \$15. For a typical respondent, the costs are estimated as \$770 (24 hours). There are no capital or operation and maintenance costs.

(c) *Estimating Agency Burden and Cost.*

The costs the Federal government would incur would be for preparing the questionnaire, answering respondent questions about the questionnaire, reviewing data submissions, addressing requests for confidentiality, and entering the data into a database. The burden estimate is presented in Table 2 at the end of this supporting statement. Hourly labor rates were assumed to be the same as in the respondent burden estimate.

(d) *Estimating the Respondent Universe and Total Burden and Costs.*

The total annual burden shown in Table 1 for the entire industry is estimated as 247 management hours, 4,941 technical hours, and 493 clerical hours at a cost of \$182,551 per year over the three year period. The total annual burden and costs are based on mailing the survey to a total of 742 foundries.

(e) *Bottom Line Burden Hours and Cost Tables.*

(i) *Respondent Tally.* The total annual respondent burden is given in Table 1 and is estimated as 5,681 hours and \$182,551.

(ii) *The Agency tally.* The total annual Agency burden is given in Table 2 and is estimated as 972 hours and \$31,252.

(iii) Variations in the annual bottom line. This section does not apply since no significant variation is anticipated.

(f) Reasons for Change in Burden.

This section does not apply since this is a new collection.

(g) Burden Statement

The average respondent burden for each foundry is estimated as 24 hours and a cost of \$770. This includes time to read the instructions, search for data, complete the survey forms, and transmit the information. No capital costs or operation and maintenance costs will be incurred.

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 currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2137), 401 M St., S.W., Washington, DC 20460; and 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. Include the EPA ICR number and OMB control number in any correspondence.

PART B OF THE SUPPORTING STATEMENT

This section is not applicable because statistical methods are not used in the data collection associated with this information collection.

TABLE 1. ANNUAL RESPONDENT BURDEN AND COST

Burden item	(A) Person hours per respondent ^a	(B) Respondents per year ^b	(C) Technical person hours per year (C = A x B)	(D) Management person hours (0.05 x C)	(E) Clerical person hours (0.1 x C)	(F) Cost ^c (\$/yr)
1. Review instructions	0.5	247 ^d	124	6	12	4,566
2. Acquire, install, utilize technology and systems	NA ^e	--	--	--	--	--
3. Adjust existing ways to comply with previous instructions	NA ^e	--	--	--	--	--
4. Train personnel	NA ^e	--	--	--	--	--
5. Search data sources ^e	3.0	247 ^d	741	37	74	27,376
6. Complete and review information collection ^e	16	247 ^d	3,952	198	395	146,043
7. Transmit the information	0.5	247 ^d	124	6	12	4,566
TOTAL LABOR BURDEN AND COST			4,941	247	493	182,551

^a Based on pretest responses from eight companies with 12 foundries.

^b Annualized over the 3 year period.

^c Costs are based on the following hourly rates: technical at \$33, management at \$49, clerical at \$15.

^d 742 facilities over 3 years = 247 per year.

^e Not applicable because this collection relies on readily available information with no new systems, technology, or personnel training required.

TABLE 2. ANNUAL BURDEN AND COST FOR THE FEDERAL GOVERNMENT

Activity	(A) Hr/occurrence	(B) Number of occurrences per year ^a	(C) Technical person- hours/year (A x B)	(D) Management person- hours/year (C x 0.05)	(E) Clerical person- hours/year (C x 0.1)	(F) Cost ^b
1. Develop survey	160	0.33 ^c	53	3	5	\$1,971
2. Distribute survey	40	0.33 ^c	13	1	1	\$493
3. Answer questions	0.5	25 ^d	13	1	1	\$493
4. Log in and acknowledge receipt of responses	1	247 ^e	247	12	25	\$9,114
5. Enter into data base, QA check, analyze and summarize results	2	247 ^e	494	25	49	\$18,262
6. Respond to requests for confidentiality	1	25 ^d	25	1	3	\$919
Total burden and cost			845	43	84	\$31,252

^a The number of occurrences are annualized over the three year period.

^b Costs are based on the following hourly rates: technical at \$33, management at \$49, clerical at \$15.

^c This one time occurrence is divided by 3 to estimate annual rate.

^d Assume 10 percent will have questions and 10 percent will submit confidential information (74) over the 3 year period ($74/3 = 25$).

^e For a total of 742 facilities over 3 years ($742/3 = 247$).