

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR part 63, subpart N) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR part 63, subpart N) (Renewal)

1(b) Short Characterization/Abstract

The national emission standards for hazardous air pollutants (NESHAP) using maximum achievable control technology (MACT) for control of chromium emissions from hard and decorative chromium electroplating and chromium anodizing tanks were proposed on December 16, 1993 and promulgated on January 25, 1995. This rule applies to sources performing hard chromium electroplating, decorative chromium electroplating, and chromium anodizing. The affected source is each chromium electroplating, or chromium anodizing tank. This information is being collected to assure compliance with 40 CFR part 63, subpart N.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports. Respondents that are not required to conduct an initial performance test (i.e., decorative chromium electroplating, or chromium anodizing operations that use a wetting agent and meet the surface tension limit in the NESHAP, and decorative chromium electroplating operations that use a trivalent chromium bath) are required to notify the Administrator of the initial compliance status of the source. Owners, or operators also are 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.

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.

There are approximately 5,020 chromium electroplating and anodizing operations nationwide. Of this total, approximately 1,540 are hard chromium electroplating operations, 2,800 are decorative chromium electroplating operations, and 680 are chromium anodizing operations. No net growth is predicted for this industry. It is expected that new tanks will only be added to replace, or expand existing capacity and that few new facilities will be constructed. The ongoing monitoring, reporting, and recordkeeping for new tanks are the same as those for

existing tanks. Information regarding the number of affected facilities was derived from the National Metal Finishing Resource Center, an Internet site developed through a partnership between the Federal government and the metal finishing industry which provides a continuous forum to discuss the implementation of regulatory requirements, including the NESHAP subpart N: Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.

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

The 5,020 facilities in the United States, which are respondents to this ICR, are publicly owned and operated by facilities with chromium electroplating and anodizing operations. None of the facilities is owned by state, local, or tribal agencies, or the Federal Government.

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, 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, chromium emissions from hard and decorative chromium electroplating and chromium anodizing tanks cause, or contribute to air pollution that may reasonably be anticipated to endanger public health, or welfare. Therefore, the NESHAP-MACT standards were promulgated for this source category at 40 CFR part 63, subpart N.

2(b) Practical Utility/Users of the Data

The control of emissions of chromium emissions from hard and decorative chromium electroplating and chromium anodizing tanks requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of chromium from hard and decorative chromium electroplating and chromium anodizing tanks are the result of operation of the chromium electroplating and chromium anodizing tanks. The subject standards are achieved by the capture of chromium emissions using control technology such as composite mesh pads, packed bed scrubbers and fiber bed mist eliminators, and the control of chromium emissions using fume suppressants. The notifications required in the applicable regulations 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. Performance test reports are needed as these form the Agency's record of a source's initial capability to comply with the emission standards, and serve as a record of the operating conditions under which compliance was achieved. The ongoing compliance status reports (i.e., semiannual reports for major sources and annual reports for area sources) are used for problem identification, as a check on source operation and maintenance, 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 continue to operate the control equipment in compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with the applicable regulations, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements also is used for targeting inspections, and is of sufficient quality to be used as evidence in court.

3. Nonduplication, Consultations, and Other Collection Criteria

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

3(a) Nonduplication

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, 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 on October 6, 2006 at 71 FR 58853. No comments were received on the burden published in the Federal Register.

3(c) Consultations

Agency resources have been consulted, including the industry experts at the EPA Office of Air Quality Planning and Standards (OAQPS) and the AFS (Air Facility System). AFS is the primary source of compliance information reported by industry in order to comply with the recordkeeping and reporting provisions in the standard. AFS is operated and maintained by the EPA Office of Compliance, and is the EPA database for the collection, maintenance, and retrieval of all compliance data. We have also discussed the industry growth rate with Christian Richter, who represents the National Association for Surface Finishing in Washington, D.C. at (202) 457-0630. We have determined that approximately 5,020 respondents will be subject to the standard over the three-year period covered by this ICR.

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 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 likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

3(e) General Guidelines

None of these reporting, or recordkeeping requirements violates any of the regulations established by OMB at 5 CFR part 1320, section 1320.5. These standards require affected facilities 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. Also, the retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. EPA would be prevented from pursuing the worst violators due to the destruction, or nonexistence of records if records were retained for less than five years.

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 (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 contains sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are sources performing hard chromium electroplating, decorative chromium electroplating, and chromium anodizing. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standard with the corresponding North American Industry Classification System (NAICS) codes are listed below.

SIC Code	NAIC Code	Source Description
3471	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring
3423	332212	Hand and Edge Tool Manufacturing
3479	332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers
3593	333995	Power Cylinder and Actuator Manufacturing

4(b) Information Requested

(i) Data Items

All data recorded and/or reported in this ICR are required by NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR part 63, subpart N).

A source must make the following reports:

Notification Reports	
Notification of construction/reconstruction	63.5(a); 63.5(b); 63.5(e); 63.345
Notification of initial performance test	63.347(d)
Reschedule of initial performance test	63.7(b)(2)
Notification of compliance status	63.347(e)
Request for extension of compliance status, adjustments to time periods, and changes in information	63.9(c); 63.9(i); 63.9(j); 63.343(a)(6)

Reports	
Initial performance test results	63.347(f)
Operation and maintenance plan	63.342(f)(3); 63.347(g)(3)
Submission of site specific test plan upon request	63.344(a)
Ongoing semiannual compliance status reports for major sources, unless the source is required to submit it a more frequent basis (e.g., quarterly reports are required when an emission limit is exceeded), except for sources using trivalent chromium baths	63.347(g)
Ongoing annual compliance status reports for area sources, unless the source is required to submit it a more frequent basis (e.g., semiannual reports are required when the duration of an excess emissions is one percent or greater of the total operating time), except for sources using trivalent chromium baths	63.347(h)
Request to reduce reporting frequency of ongoing compliance status reports	63.347(g)(2); 63.347(h)(2)
Reports associated with trivalent chromium baths	63.347(i)

A source must keep the following records:

Recordkeeping	
General recordkeeping requirements (e.g., startups, shutdowns and malfunctions including process equipment, air pollution control equipment, maintenance performed, and actions taken outside of the scope of the existing plans, records of monitoring data used to demonstrate compliance, performance test results, documentation supporting notifications and reports)	63.346(a); 63.346(b)
Records for sources with continuous monitoring systems	63.346(b)
Records are required to be retained for 5 years. The first 2 years of records must be kept onsite.	63.10(b)(1); 63.346(c)

(ii) Respondent Activities

Respondent Activities	
Read instructions.	
Install, calibrate, maintain, and operate monitoring system for pressure drop for composite mesh pad systems and fiber bed mist eliminators; pressure drop and velocity pressure for packed bed scrubbers, surface tension for wetting agents, or the appropriate parameter for an alternative control option.	
Perform initial performance test, Reference Method 306, 306(a) or 306(b), and repeat performance tests if necessary.	

Respondent Activities
Write the notifications and reports listed above.
Enter information required to be recorded above.
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.

Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., pressure drop and temperature monitors). 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. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically, which is reducing the reporting burden. However, electronic reporting systems still are not used widely by the regulatory agencies. It is estimated that approximately 10 percent of the respondents use electronic reporting.

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, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Air Facility System (AFS).

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 operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard and to 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. 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 entered into the Air Facility System (AFS), which is operated and maintained by the EPA Office of Compliance. AFS is the EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS 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, or operator for five years.

5(c) Small Entity Flexibility

The majority of affected facilities subject to this regulation are small businesses. The recordkeeping and reporting requirements were selected within the context of this specific subpart and the specific process equipment and pollutant. The impact on small businesses was accounted for in the regulation development. Reduction in reporting was provided to small businesses subject to this regulation. Small (area source) businesses are only required to prepare annual compliance status reports and may retain these reports on site. These reports must be submitted to the Agency, or a delegated authority on a semiannual basis only when the duration of excess emissions and air pollution control device malfunctions exceeds specified thresholds. Depending on their performance, the major source facilities must prepare and submit periodic reports on a semiannual, or quarterly basis.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1. Annual Respondent Burden and Cost: NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR part 63, subpart N)

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 NESHAP subpart N. The individual

burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, the 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 495,774 hours (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents available 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: \$93.09 per hour for Executive, Administrative, and Managerial labor; \$64.13 per hour for Technical labor, and \$39.65 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2003, "Table 10. Private Industry, 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.

Managerial	\$93.09	(\$44.33 + 110%)
Technical	\$64.13	(\$30.54 + 110%)
Clerical	\$39.65	(\$18.88 + 110%)

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

The types of industry costs associated with the information collection activity in the standards are both labor costs, which are addressed elsewhere in this ICR, and the costs associated with continuous monitoring of operating parameters associated with the following control options: fume suppressants; packed bed scrubbers; composite mesh pads; and fiber bed mist eliminators. The capital startup costs are one time costs incurred when a facility becomes subject to the standard. The annual operations and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage. The total respondent costs have been calculated on the addition of the capital start up costs and the annual operations and maintenance costs.

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)
Operating Parameter Monitoring Systems	\$0.00	0	\$0.00	\$15,000	5,020	\$75,300,000

There are no total capital/startup costs for this ICR since we have assumed that there will be no industry growth over the period of this ICR. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$75,300,000. This is the total of column G.

The total respondent costs in block 14 have been calculated as the addition of the capital/startup costs, and the annual operation and maintenance costs. 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 \$75,300,000.

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 reviewing 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 \$545,818. This cost is based on the following hourly labor breakdown times a 1.6 benefits multiplication factor to account for government overhead expenses:

Managerial	\$53.22 (GS-13, Step 5, \$33.26 x 1.6)
Technical	\$39.49 (GS-12, Step 1, \$24.68 x 1.6)
Clerical	\$21.38 (GS-6, Step 3, \$13.36 x 1.6)

These rates are from the Office of Personnel Management (OPM) "2003 General Schedule" which excludes locality rates of pay. The details upon which this estimate is based appear in Table 2. Annual Burden and Cost for the Federal Government: NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR part 63, subpart N).

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

We estimate that there are approximately 5,020 chromium electroplating and anodizing operations nationwide which currently are subject to the standard. Of this total, approximately 1,540 are hard chromium electroplating operations, 2,800 are decorative chromium electroplating operations, and 680 are chromium anodizing operations. It is estimated that no new sources per year will become subject to the regulation in the next three years, since no net growth is predicted for this industry.

Number of Respondents over the three-year period of this ICR is 5,020. The number of respondents is calculated using the following table:

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents	(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	4,740	280	0	5,020
2	0	4,740	280	0	5,020
3	0	4,740	280	0	5,020
Average	0	4,740	280	0	5,020

To avoid double-counting respondents column D is subtracted.

The number of Total Annual Responses is 5,968. The total number of annual responses per year is calculated using the following table:

Total Annual Responses					
(A) Number of New Respondents	(B) Number of Reports for New Respondents	(C) Number of Existing Respondents	(D) Number of Reports for Existing Respondents *	(F) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(AxB)+(CxD)+F
0	6	3,792	1	280	5,968
		948	2		

*We assume that all sources are area sources. Area sources, except for chromium anodizing plants (4,740), are required to submit an annual compliance status report. However, sources are required to submit these reports on a more frequent basis if excess emissions occurs (i.e., semiannually for area sources). We further assume that 80 percent of the sources (0.80 times 4,740 yields 3,792) will have no excess emissions and 20 percent of the sources (0.20 times 4,740 yields 948) will have excess emissions.

The total annual labor costs are \$31,362,892. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost: NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR part 63, subpart N).

Note that the total annual capital and O&M costs to the regulated entity are \$75,300,000. These costs are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

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

The bottom line burden hours and cost tables for both the Agency and the respondents are attached. The annual public reporting and recordkeeping burden for this collection of information are estimated to average 83 hours per response.

6(f) Reasons for Change in Burden

There is no change in the labor hours or cost 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. Second, the growth rate for the industry is very low, so there is no significant change in the overall burden.

Because 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 to estimate the industry burden, as well as the Federal Government burden estimate with one exception. The burden associated with regulators attending performance tests was deleted since it would be considered an activity which is part of the implementation of the enforcement program and therefore, cannot be attributed to this rule.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information are estimated to average 83 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'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-2006-0749. 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), EPA 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) 566-1927. Also, comments can be sent 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-2006-0749 and OMB Control Number 2060-0327 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 Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR part 63, subpart N)

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) Cost ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A							
4. Reporting Requirements								
A. Read instructions	1	1	1	6	6.0	0.3	0.6	\$436.50
B. Required activities:								
Performance tests ^c	Included in 4E							
Monitoring of operations equipment ^d	Included in 5E							
C. Create Information	Included in 4B and 5E							
D. Gather Existing Information	Included in 4B and 5E							
E. Write report ^{a, e}								
Notification of compliance status	2	1	2	0	0.0	0.0	0.0	\$0.00

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) Cost ^b
Notification of actual startup	2	1	2	0	0.0	0.0	0.0	\$0.00
Notification of construction reconstruction ^a	2	1	2	0	0.0	0.0	0.0	\$0.00
Notification of performance test	2	1	2	0	0.0	0.0	0.0	\$0.00
Notification of actual startup	2	1	2	0	0.0	0.0	0.0	\$0.00
Reports of performance test Results	4	1	4	0	0.0	0.0	0.0	\$0.00
Operation and maintenance plan	10	1	10	0	0.0	0.0	0.0	\$0.00
Annual compliance status reports for area sources ^f	4	1	4	3,792	15,168.0	758.4	1,516.8	\$1,103,464.42
Semiannual reports of exceedances for area sources ^g	8	2	16	948	15,168.0	758.4	1,516.8	\$1,103,464.42
Semiannual compliance status reports for major sources ^h	8	2	16	0	0.0	0.0	0.0	\$0.00
Quarterly compliance status reports for major sources ^{g, h}	8	2	16	0	0.0	0.0	0.0	\$0.00
Request to reduce report frequency ^g	2	1	2	474	948.0	47.4	94.8	68,966.53

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) Cost ^b
5. Recordkeeping Requirements								
A. Read instructions	Included in 4A							
B. Plan activities	Included in 4B							
C. Implement activities	Included in 4B							
D. Develop record system	40	1	40	0.0	0.0	0.0	0.0	\$0.00
E. Time to enter and transmit information:								
Records of monitoring:								
- Composite mesh pad/packed bed scrubber ⁱ	0.5	250	125	2,122	265,250	13,262.5	26,525.0	19,296,804.88
- Wetting agents (normal schedule) ^{j, k}	0.25	1000	250	262	65,500	3,275.0	6,550.0	4,765,092.25
- Wetting agents (reduced frequency schedule ^{j, k})	0.25	100	25	2,356	58,900	2,945.0	5,890.0	4,284,945.55
- Foam blankets (normal schedule) ^l	0.25	4,000	1,000	0.0	0.0	0.0	0.0	\$0.00
- Foam blankets (reduced frequency schedule) ^l	0.25	500	125	0.0	0.0	0.0	0.0	\$0.00
- Excess emissions	Included in 4E							
Records of operations: ^m								
- Operation and maintenance	1	4	4	2,142	8,488.0	424.4	848.8	617,497.76

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) Cost ^b
- Cumulative rectifier capacity	Included in 4E							
- Operating time	Included in 4E							
- Records of trivalent chromium bath purchases ⁿ	0.5	12	6	280	1,680.0	84.0	168.0	\$122,219.16
F. Time to train personnel	N/A							
G. Time for audits	N/A							
TOTAL LABOR BURDEN AND COST (Rounded)					431,108.0	21,555.4	43,110.8	\$31,362,892
TOTAL LABOR HOURS					495,774			

Assumptions:

^a There are an estimated total of 5,020 chromium electroplating and anodizing operations nationwide. Of this total, approximately 1,540 are hard chromium electroplating operations, 2,800 are decorative chromium electroplating operations, and 680 are chromium anodizing operations. No net growth is predicted for this industry. It is expected that new tanks will only be added to replace or expand existing capacity. The ongoing monitoring, reporting, and recordkeeping for new tanks is the same as that for existing tanks.

^b This ICR uses the following labor rates: \$93.09 per hour for Executive, Administrative, and Managerial labor; \$64.13 per hour for Technical labor, and \$39.65 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2003, ATable 10. Private Industry, by occupational and industry group@. The rates are from column 1, ATotal compensation.@ These rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

^c Sources are required to conduct performance tests using Methods 306 or 306A of Appendix A, or the California Air Resources Board (CARB) Method 425, as an alternative, Method 306B, and alternate methods if the method has been validated using Method 301 of Appendix A.

^d Sources are required to follow work practice standards at composite-mesh-pad (CMP) systems, packed-bed scrubbers (PBS), PBS/CMP systems, fiber-bed mist eliminators, and other air pollution control devices not listed in the rule, as well as monitoring operational parameters (i.e., pressure drop for composite mesh pad systems and fiber bed mist eliminators; pressure drop and velocity pressure for packed bed scrubbers, surface tension for wetting agents, or the

appropriate parameter for an alternative control option) and monitoring equipment.

^e We have assumed that all existing sources are in compliance with the initial rule requirements.

^f All sources, except decorative chromium electroplating plants using trivalent chromium bath (5,020 less 280 yields 4,740), are required to submit compliance status reports. Area sources are required to submit an annual compliance status report and major sources a semiannual compliance status report. However, we have assumed that 80 percent of the sources (0.80 times 4,740 yields 3,792) will have no excess emissions and 20 percent of the sources (0.20 times 4,740 yields 948) will have excess emissions.

^g If excess emissions occur at the plant, sources are required to submit these reports on a more frequent basis (i.e., semiannually for area sources and quarterly for major sources) until the regulatory agency has approved the source request to reduce frequency of ongoing compliance status reports.

^h We have assumed that all sources are area sources. We have further assumed that half of the area sources submitting semiannual reports due to excess emissions (0.5 times 948 yields 474) will request the regulatory agency to approve a reduction in frequency for ongoing compliance status reports (i.e., annual reporting).

ⁱ We have assumed that the monitoring required for composite mesh pad/packed bed scrubbers occurs once per day, 5 five days a week, 50 weeks per year for all plants with add-on control devices. The number of facilities with add-on control devices is estimated to be 1,222 based on the assumption that all hard chromium electroplating facilities (1,540), 15 percent of the decorative chromium electroplating that use hexavalent chromium bath (0.15 percent times 2,520 yields 378) and 30 percent of chromium anodizing facilities (0.30 times 680 yields 204) will use add-on control devices.

^j We have assumed that 85 percent of decorative chromium electroplating plants that use hexavalent chromium bath (0.85 times 2,520 yields 2,142) and 70 percent of chromium anodizing plants (0.70 times 680 yields 476) will use wetting agents for a total of 2,618 sources.

^k We have assumed that area sources using wetting agents will be required to monitor once every four hours and at least twice per shift, five days a week, 50 weeks per year per operating schedule if the source is on a regular monitoring schedule. If the source is on a reduced monitoring schedule, it will be required to monitor once every 40 hours for 16-hour day, five days a week, 50 weeks per year per operating schedule. We have assumed that 90 percent of the sources (0.90 times 2,618 yields 2,356) will be on a normal schedule and 10 percent of the sources (0.10 times 2,618 yields 262) are on a reduced schedule.

^l We have assumed that sources will not elect to use foam blankets because the rule requires them to do compliance testing. If sources elect to use foam blankets, the reduced monitoring schedule will required them to monitor once every 8 hours, per 16-hour day, five days a week, 50 weeks per year per operating schedule. If the source is on a normal monitoring schedule it will be required to monitor once every hour, per 16-hour day, five days a week, 50 weeks per year per operating schedule.

^m We have assumed that all facilities with add-on control devices (1,222) would be required to have an approved Operation and Maintenance Plan for their operations.

ⁿ We have assumed that 10 percent of the decorative chromium electroplating plants (0.10 x 2,800 yields 280) use trivalent chromium baths.

**Table 2. Annual Burden and Cost for the Federal Government:
NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks
(40 CFR part 63, subpart N)**

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
Notification of compliance status ^c	2	1	2	0	0	0	0	\$0.00
Notification of actual startup ^c	2	1	2	0	0	0	0	\$0.00
Notification of construction/reconstruction ^c	2	1	2	0	0	0	0	\$0.00
Notification of actual startup ^c	2	1	2	0	0	0	0	\$0.00
Operation and maintenance plan ^{c, d}	2	1	2	0	0	0	0	\$0.00
Notification of Performance Test ^c	2	1	2	0	0	0	0	\$0.00
Reports of performance test results ^c	2	1	2	0	0	0	0	\$0.00
Annual compliance status reports for area sources ^f	2	1	2	3,793	7,584	379.2	758.4	\$335,887.78
Semiannual reports of exceedances for area sources ^g	2	2	4	948	3,792	189.6	379.2	\$167,943.89
Semiannual compliance status reports for major sources ^h	2	1	2	0	0	0	0	\$0.00
Quarterly compliance status	2	1	2	0	0	0	0	\$0.00

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
reports for major sources								
Request to reduce report frequency ^g	2	1	2	474	948	47.4	94.8	\$41,985.97
TOTAL ANNUAL COST (rounded)								\$545,818

Assumptions:

^a We have assumed that there are approximately 59 existing slabstock foam producers and 73 existing rebond/molded foam producers for a total of 132 sources. We have further assumed that about 6 existing sources a year will be conducting some type of modification at their facilities and that there will be no new sources over the period of this ICR. Therefore, the average number of respondents per year is estimated to be 132. These rates are from the Office of Planning and Management (OPM) A2003 General Schedule@ which excludes locality rates of pay.

^b This cost is based on the following labor rates which incorporate a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial rate of \$53.22 (GS-13, Step 5, \$33.26 x 1.6), Technical rate of \$39.49 (GS-12, Step 1, \$24.68 x 1.6), and Clerical rate of \$21.38 (GS-6, Step 3, \$13.36 x 1.6)

^c Assumes that all existing sources are in compliance with the initial rule requirements.

^d There will be no periodic burden for the regulatory agency associated with this requirement although we have assumed that all facilities with add-on control devices (1,222) would be required to have an approved Operation and Maintenance Plan for its operations.

^e All sources, except decorative chromium electroplating plants using trivalent chromium bath (5,020 less 280 yields 4,740), are required to submit compliance status reports. Area sources are required to submit an annual compliance status report and major sources a semiannual compliance status report. However, we have assumed that 80 percent of the sources (0.80 times 4,740 yields 3,792) will have no excess emissions and 20 percent of the sources (0.20 times 4,740 yields 948).

^f If excess emissions occur at the plant, sources are required to submit these reports on a more frequent basis (i.e., semiannually for area sources and quarterly for major sources) until the regulatory agency has approves the source request to reduce frequency of ongoing compliance status reports. We have assumed that all sources are area sources.

^g We have further assumed that half of the area sources submitting semiannual reports due to excess emissions (0.5 times 948 yields 474) will request the regulatory agency to approve a reduction in frequency for ongoing compliance status reports (i.e., annual reporting).