

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal),
EPA ICR Number 1985.05, OMB Control Number 2060-0478

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Leather Finishing Operations were proposed (65 ER 58702) on October 2, 2000, and promulgated on February 27, 2002. This standard applies to each existing, reconstructed, or new leather finishing operation. Leather finishing is defined as a single process or group of processes used to adjust and improve the physical and aesthetic characteristics of the leather surface through the multistage application of a coating comprising of dyes, pigments, film-forming materials, and performance modifiers dissolved or suspended in liquid carriers. A leather finishing operation is subject to the regulation only if it is a major source of hazardous air pollutant (HAP) emissions, or is collocated with other sources that are individually or collectively a major source of HAP emissions. A major source emits or has the potential to emit any single HAP at the rate of 10 tons (9.07 megagrams) or more per year, or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year.

In general, all NESHAP standards require initial notifications, 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.

Owners or operators of new or existing leather finishing operations must develop a plan for demonstrating compliance which specifies procedures to measure finish amounts used, HAP content of finishes, and production levels for each leather product process operation. The plan for demonstrating compliance must be completed by the compliance date, kept on the site, and available for inspection. The source must document the finish amount used, the HAP content of the finish, and the production level for each leather product process operation. Once a leather finishing operation has collected twelve months of leather production data after the date of initial notification, the leather finishing operation must submit a compliance status certification report each year.

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. Each file will be on the site for at least two years after the date of each occurrence, measurement, maintenance, report or record, and off-site for the remaining three years. 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.

Approximately ten respondents are currently subject to the regulation, and it is estimated that no additional respondents per year will become subject to the regulation in the next three years.

There are approximately ten leather finishing operations facilities in the United States, which are owned and operated by the leather finishing industry. None of these ten facilities are owned by state, local, tribal or the Federal government. Instead, they are all privately-owned and operated by for-profit businesses. You can find the burden to the “Affected Public” listed below in Table 1: Annual Respondent Burden and Cost - NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal). The Federal government burden associated with the review of reports submitted by the respondent is shown below in Table 2: Average Annual EPA Burden and Cost - NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal).

In the development of the ICR, we addressed the Office of Management and Budget (OMB) “Terms of Clearance (TOC)” on the active ICR. The TOC are as follows:

When this ICR is renewed, EPA should review the respondent burden, universe, labor rates, and capital costs and ensure these estimates have been updated.

EPA has addressed each item of concern in the TOC. The respondent burden, universe, labor rates, and capital cost have been thoroughly checked, and all estimates updated.

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 HAP. These standards are applicable to new or existing sources of HAP 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, HAP emissions from leather finishing operations cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 63, subpart TTTT.

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 standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance tests, 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 the standard 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 ensure that the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

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.

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

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

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 their 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 (76 FR 26900) on May 9, 2011. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 10 respondents will be subject to the standard over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing this ICR, we contacted the Alliance Leather Incorporated at (978) 531-6771, and Collier Shannon Scott (202) 342-8400.

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.

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 proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 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 the five years. In addition, EPA would be prevented from pursuing the violators due to either 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

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are leather finishing operations. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standard is 3111 which correspond to the North American Industry Classification System (NAICS) code 316110 for Leather and Hide Tanning and Finishing.

4(b) Information Requested

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

(i) Data Items

In this ICR, all the data recorded or reported is required by the National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT).

A source must make the following reports:

Notifications	
Initial notification	63.5415(b), 63.5415(d), 63.9(b)
Notification of intent to construct or reconstruct	63.5415(d), 63.9(b)
Notification of actual startup	63.5415(b), 63.9(b)
Notification of site-specific test plan	63.5415(e), 63.7(b)
Notification of compliance status	63.5415(f), 63.9(h)
Annual compliance status certification	63.5420(a)
Deviation report	63.5420(b)

A source must keep the following records:

Recordkeeping	
Maintain records of finish inventory	63.5430(d), 63.5335(b)
Maintain records of HAP content	63.5430(e), 63.5390
Maintain records of leather inventory	63.5430(f), 63.5400
Record 12 months compliance ratio	63.5330, 63.5430

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.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate leather finishing operations processes.
Perform initial performance test, Reference Methods 24, 311 tests, and repeat performance tests if necessary.
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.

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., continuous parameter monitoring system.) 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.

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, excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

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 operational. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and 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.

Information contained in the reports is entered into OTIS which is operated and maintained by the EPA Office of Compliance. OTIS is the EPA database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. EPA 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 the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

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 for NESHAP Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (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. Wherever 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 334 (see Total Labor Hours from Table 1). 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	\$118.92 (\$56.63 + 110%)
Technical	\$97.78 (\$46.56 + 110%)
Clerical	\$48.76 (\$23.22 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2010, "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 only costs to the regulated industry resulting from information collection activities required by the subject standards are labor costs. There are no capital/startup or operation and maintenance costs, because the leather finishing operations does not require any special monitoring or recordkeeping equipment; therefore, no capital and operations and maintenance

costs are associated with recordkeeping or reporting to the rule.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

The only type of industry costs associated with the information collection activity in the regulations is labor costs. There are no capital/startup or operation and maintenance costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA 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 \$10,365.

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

Managerial	\$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM) “2011 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 Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (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 10 respondents will be subject to the standard. It is estimated that no additional sources per year will become subject. The overall average number of respondents, as shown in the table below is 10 per year.

The number of respondents is calculated using the following table which addresses the three years covered by this ICR.

Number of Respondents					
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	10	0	0	10
2	0	10	0	0	10
3	0	10	0	0	10
Average	0	10	0	0	10

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

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 10.

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	N/A	0
Notification of intent to construct or reconstruct	0	1	N/A	0
Notification of actual startup	0	1	N/A	0
Notification of site-specific test plant	0	1	N/A	0
Notification of compliance status	0	1	N/A	0
Annual compliance status certification	10	1	N/A	10
Deviation report	0	1	N/A	0
			Total	10

The number of Total Annual Responses is 10.

The total annual labor costs are \$31,495. Details regarding these estimates may be found in Table 1: Annual Industry Burden and Cost - NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal).

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

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

(i) Respondent Tally

The total annual labor costs are \$31,495. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost -NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 33 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$0.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 230 labor hours at a cost of \$10,365. See below Table 2: Annual Agency Burden and Cost: NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal).

6(f) Reasons for Change in Burden

There is no change in the labor hours in this ICR as compared to the previous ICR. This situation is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for the industry is very low, negative, or non-existent, so there is no significant change in the overall burden.

There is, however, an increase in the estimated burden cost as currently identified in the OMB Inventory of Approved ICR Burdens. The increase is not due to any program changes. The change in burden cost is due to the use of the most updated labor rates.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 33 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-2011-0206. 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 content of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search” than 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 Avenue, N.W., 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 Enforcement and Compliance Docket and Information Center Docket 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, N.W., Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2011-0206 and OMB Control Number 2060-0478 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 Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal)

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) Total Cost Per year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions	4	1	4	0	0	0	0	\$0
B. Required activities								
Leather production determination	1	12	12	0	0	0	0	\$0
Type of Product process determination	2	4	8	0	0	0	0	\$0
Allowable HAP loss determination	1	12	12	0	0	0	0	\$0
Actual HAP loss determination	1	12	12	0	0	0	0	\$0
C. Create information	N/A							
D. Gather existing information	See 4E							
E. Write Report								
Initial notification	2	1	2	0	0	0	0	\$0
Notification of intent to construct	2	1	2	0	0	0	0	\$0
Notification of startup	2	1	2	0	0	0	0	\$0
Notification of site-specific test plan	2	1	2	0	0	0	0	\$0
Submit annual compliance status certification ^c	12	1	12	10	120	6	12	\$13,032.24
Deviation report ^d	5	1	5	0	0	0	0	\$0
Subtotal for Reporting Requirements						138		
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Develop compliance plan	50	1	50	0	0	0	0	\$0
C. Time to enter information								
Finish inventory	1	12	12	0	0	0	0	\$0
HAP content of finish	1	12	12	0	0	0	0	\$0
Leather subcategory production levels	1	12	12	0	0	0	0	\$0
D. Record compliance ratio ^e	1	12	12	10	120	6	12	\$13,032.24
E. Time to train personnel ^f	5	1	5	10	50	2.5	5	\$5,430.10

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) Total Cost Per year^b
G. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						195.5		
Subtotals Labor Burden and cost					290	14.5	29	\$31,494.58
TOTAL LABOR BURDEN AND COST (rounded)						333.5 334 (rounded)		\$31,495

Assumptions:

^a We have assumed that there are approximately ten sources that are subject to the standard, and no additional new sources will become subject to the rule over the next three years.

^b This ICR uses the following labor rates: \$118.92 per hour for Executive, Administrative, and Managerial labor; \$97.78 per hour for Technical labor, and \$48.76 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December, 2010, 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.

^c We have assumed that it will take each respondent twelve hours once per year to complete the compliance status certification report.

^d We have assumed that no respondent will submit a deviation report.

^e We have assumed that each respondent is required to record compliance ratio determination on a monthly basis.

^f We have assumed that it will take each respondent five hours once per year to train personnel.

Table 2: Average Annual EPA Burden and Cost - NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal)

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
Activity								
Review reports								
a. Initial notification	4	1	4	0	0	0	0	\$0
b. Notification of intent to construct	4	1	4	0	0	0	0	\$0
c. Notification of startup	4	1	4	0	0	0	0	\$0
d. Notification of site-specific test	4	1	4	0	0	0	0	\$0
Periodic reports								
a. Review annual compliance status certification ^c	20	1	20	10	200	10	20	\$10,364.90
b. Review deviation reports ^d	10	1	10	0	0	0	0	\$0
Optional								
Review compliance plan	20	1	20	0	0	0	0	\$0
Subtotals Labor Burden and cost					200	10	20	\$10,364.90
TOTAL ANNUAL BURDEN AND COST (rounded)						230		\$10,365

Assumptions:

^a We have assumed that there are approximately ten sources that are subject to the standard, and no additional new sources will become subject to the rule over the next three years.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 Managerial rate (GS-13, Step 5, \$38.92 x 1.6), \$46.21 Technical rate (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 Clerical rate (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) 2011 General Schedule which excludes locality rates of pay.

^c We have assumed that each respondents will take 20 hours to review the annual compliance status certification report.

^d We have assumed that no respondent will submit a deviation report.