

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT)(Renewal)**

**Part A of the Supporting Statement**

**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 1985.08, 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 on October 2, 2000, promulgated on February 27, 2002, and most-recently amended on February 7, 2005. These regulations apply to existing, reconstructed, and new leather finishing operations that are a major source of hazardous air pollutant (HAP) emissions, or are collocated with other sources that are individually or collectively a major source of HAP emissions.<sup>1</sup> New facilities include those that commenced construction, or reconstruction after the date of proposal, October 2, 2000. This information is being collected to assure compliance with 40 CFR Part 63, Subpart TTTT.

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.

Any owner/operator subject to the provisions of 40 CFR Part 63 shall maintain a file containing these documents, and retain the file for at least five years following the generation date of such reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

The “Affected Public” includes owners and operators of leather finishing operations subject to 40 CFR Part 63, Subpart TTTT. The ‘burden’ to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal). The ‘burden’ to the Federal

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<sup>1</sup> One source subject to the Leather Finishing Operations NESHAP (i.e., Tasman Leather Group, LLC) is an area source. This source is subject to the Leather Finishing Operations NESHAP because it was previously a major source and became an area source after the compliance date of the NESHAP.

Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Annual EPA Burden and Cost – NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal). All of these facilities are privately-owned, for-profit businesses. None of the facilities in the United States are owned by either state, local, tribal or the Federal government.

Over the next three years, 4 leather finishing operations will be subject to these standards, and no additional respondents per year will become subject to these same standards. These estimates are based on the Agency's re-evaluation of the source category as part of a recently proposed risk and technology review (83 FR 11314, March 14, 2018).

The Office of Management and Budget (OMB) approved the currently active ICR without any "Terms of Clearance."

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of 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/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 either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart TTTT.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in these standards 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 to determine an affected facility's initial capability to comply with these emission standards. During the performance test, a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance.

The notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of these regulations. The reviewing authority may then inspect the source to check if any pollution control devices are properly installed and operated, that leaks are being detected and repaired and that the standard is being met. The performance test may also be observed.

The required annual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

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

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart 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 its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

#### **3(b) Public notice 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* (82 FR 29552) on June 29, 2017. No comments were received on the burden published in the *Federal Register*.

#### **3(c) Consultations**

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is the EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately four respondents will be subject to these standards over the three-year period covered by this ICR. These estimates are based on the Agency's re-evaluation of the source category as part of a recently proposed risk

and technology review (83 FR 11314, March 14, 2018).

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted the Leather Industries of America, at (202) 342-8497, and the U.S. Hide, Skin and Leather Association, at (202) 587-4250.

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 Data Collection**

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards were collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

### **3(e) General Guidelines**

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to these standards. The 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 the EPA to establish the compliance history of a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. The EPA has found that the most flagrant violators have violations extending beyond five years. In addition, the EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

### **3(f) Confidentiality**

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBS) (see 40 CFR 2; 41 *FR* 36902, September 1, 1976; amended by 43 *FR* 40000, September 8, 1978; 43 *FR* 42251, September 20, 1978; 44 *FR* 17674, March 23, 1979).

### 3(g) Sensitive Questions

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

## 4. The Respondents and The Information Requested

### 4(a) Respondents/NAICS Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of leather finishing operations. The United States Standard Industrial Classification (SIC) code and the corresponding North American Industry Classification System (NAICS) code for the respondents affected by the standards are listed in the table below.

Standard (40 CFR Part 63, Subpart LLLLL)	SIC Codes	NAICS Codes
Leather and Hide Tanning and Finishing	3111	316110

### 4(b) Information Requested

#### (i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Leathering 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 startup	§§ 63.5415(b), 63.9(b)
Notification of performance test	§§ 63.5415(e), 63.7(b)
Notification of compliance status	§§ 63.5415(f), 63.9(h)

Reports	
Annual compliance status certification	§§ 63.5420(a)
Deviation report	§§ 63.5420(b)

A source must keep the following records:

<b>Recordkeeping</b>	
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

Currently, sources are using monitoring and reporting equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate leather finishing operations processes.
Perform initial performance test, Reference Method 24 and 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 collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

### 5(a) Agency Activities

The EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

<b>Agency Activities</b>
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 Enforcement and Compliance History Online (ECHO).

### 5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standards 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. The annual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

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

### 5(c) Small Entity Flexibility

Three of the 4 respondents are small entities (i.e., small businesses). The impact on small entities was taken into consideration during the development of the original regulation and in recently proposed amendments (83 FR 11314, March 14, 2018). 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 – NESHAP for 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. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may neither conduct nor 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 138 hours (Total Labor Burden from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, the EPA’s recent reevaluation of the source category inventory under the EPA’s efforts to prepare amendments to the rulemaking under the risk and technology review, 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	\$102.86 (\$48.98+ 110%)
Technical	\$95.11 (\$45.29+ 110%)
Clerical	\$37.86 (\$18.03+ 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, "May 2017 National Industry-Specific Occupational Employment and Wage Estimates NAICS 316100 - Leather and Hide Tanning and Finishing." The selected labor rates are the mean hourly wage for labor categories 11-1021, 11-3051, and 43-6010 for Managerial, Technical, and Clerical, respectively. The rates have been increased by 110 percent to account



for the benefit packages available to those employed by private industry.

**(ii) Estimating Capital/Start-up 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 (O&M) costs because no current leather finishing operations subject to the Leather Finishing Operations NESHAP complies with the NESHAP using a control device, and it is estimated that no sources are expected to start-up over the next three years.

**(iii) Capital/Startup and 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 O&M costs.

**6(c) Estimating Agency Burden and Cost**

The only costs to the Agency are associated with analysis of the reported information. The Agency's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$4,370.

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

Managerial	\$65.71 (GS-13, Step 5, \$41.07 + 60%)
Technical	\$48.75 (GS-12, Step 1, \$30.47 + 60%)
Clerical	\$26.38 (GS-6, Step 3, \$16.49 + 60%)

These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes locality rates of pay.<sup>2</sup> 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: 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, 4 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 4 per year.

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<sup>2</sup> Available at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf).

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

<b>Number of Respondents</b>					
	<b>Respondents That Submit Reports</b>		<b>Respondents That Do Not Submit Any Reports</b>		
<b>Year</b>	<b>(A) Number of New Respondents <sup>1</sup></b>	<b>(B) Number of Existing Respondents</b>	<b>(C) Number of Existing Respondents that keep records but do not submit reports</b>	<b>(D) Number of Existing Respondents That Are Also New Respondents<sup>2</sup></b>	<b>(E) Number of Respondents (E=A+B+C-D)</b>
1	0	4	0	0	4
2	0	4	0	0	4
3	0	4	0	0	4
Average	0	4	0	0	4

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

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

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
<b>(A) Information Collection Activity</b>	<b>(B) Number of Respondents</b>	<b>(C) Number of Responses</b>	<b>(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports</b>	<b>(E) Total Annual Responses E=(BxC)+D</b>
Initial notification	0	1	0	0
Notification of intent to construct	0	1	0	0
Notification of startup	0	1	0	0
Notification of performance test	0	1	0	0
Notification of compliance status	0	1	0	0
Annual compliance status certification	4	1	0	4

<b>Total Annual Responses</b>				
Deviation report	0	1	0	0
			Total	4

The number of Total Annual Responses is 4.

The total annual labor costs are \$12,500.00 (rounded). 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).

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

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

**(i) The Respondent Tally**

The total annual labor hours are 138 hours. 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).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden is estimated to average 35 hours per response.

There are neither annual capital/startup nor O&M costs to this regulated entity.

**(ii) The Agency Tally**

The average annual Agency burden and cost over the next three years is estimated to be 92 labor hours at a cost of \$4,370. Details regarding these estimates may be found in Table 2: Annual EPA Burden and Cost – NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

**6(f) Reasons for change in burden**

There is an adjustment decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This decrease is not due to any program changes. The change in the burden and cost estimates is due to more accurate estimates of existing sources based on the EPA's recent reevaluation of the source category inventory as part of a recently proposed risk and technology review (83 FR 11314, March 14, 2018), which indicated that several facilities have shut down since the last ICR renewal period. These changes result in an overall decrease in the labor hours, number of responses, and O&M costs.

**6(g) Burden Statement**

The annual average public reporting and recordkeeping burden for this collection of information is estimated to be 35 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 neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2014-0083. 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 EPA Docket Center (EPA/DC), EPA WJC West Building, 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. Eastern Standard Time (EST), Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, NW, Washington, DC 20503. Please include the EPA Docket ID Number EPA-HQ-OAR-2014-0083 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.



requirements									
B. Develop compliance plan	50	1	50	0	0	0	0	0	\$0
C. Enter information									
Finish inventory	1	12	12	0	0	0	0	0	\$0
HAP content of finish	1	12	12	0	0	0	0	0	\$0
Leather subcategory production levels	1	12	12	0	0	0	0	0	\$0
D. Record compliance ratio <sup>b</sup>	1	12	12	4	48	48	2.4	4.8	\$4,993.83
E. Train personnel <sup>h</sup>	5	1	5	4	4	20	1.0	2.0	\$2,080.76
F. Audits	N/A								
<b>Subtotal for Recordkeeping Requirements</b>							<b>78</b>		<b>\$7,075</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>i</sup></b>							<b>138</b>		<b>\$12,500</b>
<b>TOTAL CAPITAL AND O&amp;M COST <sup>i</sup></b>									\$0
<b>GRAND TOTAL (rounded) <sup>i</sup></b>									<b>\$12,500</b>

<sup>a</sup> There are four respondents subject to the standard, and no additional new sources will become subject to the rule over the next three years.

<sup>b</sup> This ICR uses the following labor rates: \$102.86 per hour for Executive, Administrative, and Managerial labor; \$95.11 per hour for Technical labor, and \$37.86 per hour for Clerical labor. The Wage categories "Technical," "Clerical," and "Managerial" refer to the labor category codes 11-3051, 43-6010, and 11-1021, respectively, in the United States Department of Labor, Bureau of Labor Statistics table titled "May 2017 National Industry-Specific Occupational Employment and Wage Estimates NAICS 316100 - Leather and Hide Tanning and Finishing." found here: [https://www.bls.gov/oes/current/naics4\\_316100.htm](https://www.bls.gov/oes/current/naics4_316100.htm). The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed that the burden associated with monthly recording of actual and allowable HAP loss values are included in burden item 4D.

<sup>d</sup> Moved this initial notification to a separate line. In Table 1 of the current ICR for the Leather Finishing Operations NESHAP, this notification is included with the Annual compliance status certification.

<sup>e</sup> We have assumed that it will take each respondent twelve hours once per year to complete the compliance status certification report.

<sup>f</sup> We have assumed that no respondent will submit a deviation report.

<sup>g</sup> We have assumed that each respondent is required to record compliance ratio determination on a monthly basis.

<sup>h</sup> We have assumed that it will take each respondent five hours once per year to train personnel.

<sup>i</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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

Activity	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (AxB)	Plants per year <sup>a</sup>	Technical person-hours per year (CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ <sup>b</sup>
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 <sup>c</sup>	20	1	20	4	80	4	8	\$4,374.08
b. Review deviation reports <sup>d</sup>	10	1	10	0	0	0	0	\$0
Optional								
Review compliance plan	20	1	20	0	0	0	0	\$0
<b>TOTAL COST (rounded) <sup>e</sup></b>						<b>92</b>		<b>\$4,370</b>

<sup>a</sup> There are four sources that are subject to the standard, and no additional new sources will become subject to the rule over the next three years.

<sup>b</sup> This cost is based on the following labor rates which have been increased by 60 percent to account for the benefit package available to government employees: \$65.71 Managerial rate (GS-13, Step 5, \$41.07 + 60%), \$48.75 Technical rate (GS-12, Step 1, \$30.47 + 60%), and \$26.38 Clerical rate (GS-6, Step 3, \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) 2018 General Schedule which excludes locality rates of pay.

<sup>c</sup> We have assumed that each respondent will take 20 hours to review the annual compliance status certification report.

<sup>d</sup> We have assumed that no respondent will submit a deviation report.

<sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.