

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

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

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) (Amendments), EPA ICR Number 1985.09, OMB Control Number 2060-0478.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Leather Finishing Operations (hereafter referred to as the Leather Finishing Operations NESHAP) was proposed on October 2, 2000, promulgated on February 27, 2002, and most recently amended on February 7, 2005. The NESHAP is codified at 40 CFR Part 63, Subpart TTTT. This supporting statement addresses information collection activities that will be imposed by the Leather Finishing Operations NESHAP, including both activities for which the burden has previously been approved under OMB Control No. 2060-0478 and activities added based on the residual risk and technology review (RTR) required under the Clean Air Act (CAA). These information collection activities are required to assure compliance with 40 CFR Part 63, Subpart TTTT. The NESHAP applies to each existing, reconstructed, and new leather finishing operation that 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.¹ 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. New facilities include those that commenced construction, or reconstruction after the date of proposal, October 2, 2000. This NESHAP limits emissions of total HAP for the collection of all equipment and activities used for the multistage application of finishing materials (dyes, pigments, film-forming materials, and performance modifiers dissolved or suspended in liquid carriers) to adjust and improve the physical and aesthetic characteristics of the leather surface.

As part of the RTR for the Leather Finishing Operations NESHAP, the EPA added electronic submittal of performance tests, revised records and reports if a control device is used, and clarified and corrected existing rule text, including removing provisions related to malfunctions to clarify that affected facilities are subject to the emission standards at all times. The remaining portions of the NESHAP remain unchanged.

¹ 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.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. Owners/operators are also required to maintain records of the occurrence and duration of any failures to meet applicable standards; startup, shutdown, or malfunction in the operation of an affected facility; and 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. This ICR includes the burden for all activities that will be conducted in the first three years following promulgation of the RTR amendments to the Leather Finishing Operations NESHAP. These activities include reading the rule and completing the recordkeeping and reporting requirements.

This ICR presents the burden to respondents and the Designated Administrator (i.e., U.S. EPA or a delegated authority) that will be imposed by the plans developed to implement the Leather Finishing Operations NESHAP. Respondents are owners or operators of existing major source leather finishing operations.¹ The requirements described below are the minimum requirements established by the amended Leather Finishing Operations NESHAP. Although the Designated Administrator may choose to impose more stringent requirements, it is assumed for this burden estimate that the implemented plans mirror the Leather Finishing Operations NESHAP.

Respondents are owners or operators of leather finishing operations. Over the next three years, four leather finishing operations will be subject to this standard per year and shall maintain a file of measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. This estimate is based on the research conducted by the EPA during the subpart TTTT RTR rulemaking. None of these four operations are owned by state, local, or tribal governments or the Federal government. They are owned and operated by privately-owned for-profit businesses. All reports are sent to the Designated Administrator. The required annual reports required of all affected facilities are used to determine periods of excess emissions, identify problems at the facility, and verify operation/maintenance procedures and for compliance determinations.

The average annual labor, capital, and operations and maintenance costs of this ICR for the four leather finishing operations will be \$10,464 per year for the first three years following promulgation of the RTR amendments, \$235 of which is due to the RTR amendments. The burden for the respondents may be found in Tables 1 through 4 in Attachment 1. Tables 1 through 3 provide the burden itemized by year. Table 4 provides a summary of all three years. The average annual labor costs for the Designated Administrator to implement the requirements in the NESHAP following promulgation of the RTR amendments will be approximately \$4,272 per year, \$0 of which is due to the RTR amendments. This burden may be found in Tables 5 through 8 of Attachment 2. Tables 5 through 7 provide the burden itemized by year. Table 8 provides a summary of all three years.

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

Section 112 of the CAA requires the EPA to establish NESHAP for major sources of HAP that are listed for regulation under CAA section 112(c). A major source is a stationary source that emits or has the potential to emit more than 10 tpy of any single HAP or more than 25 tpy of any combination of HAP. For major sources, the NESHAP includes technology-based standards that must reflect the maximum degree of emission reductions of HAP achievable (after considering cost, energy requirements, and non-air quality health and environmental impacts). The NESHAP are commonly referred to as Maximum Achievable Control Technology (MACT) standards. In the Administrator's judgment, HAP emissions, including chromium III, diethylene glycol monobutyl ether, diethylene glycol monomethyl ether, ethylene glycol, methyl isobutyl ketone, toluene, triethylamine, and propyl cellosolve from leather finishing operations cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP for this source category were promulgated at 40 CFR Part 63, Subpart TTTT in 2002.

Section 112(d)(6) of the CAA requires the EPA to review the technology-based MACT standards and revise them "as necessary (taking into account developments in practices, processes, and control technologies)" no less frequently than every 8 years. In addition, section 112(f) of the CAA requires the EPA to determine whether the MACT emissions limitations provide an ample margin of safety to protect public health. For MACT standards for HAP "classified as a known, probable, or possible human carcinogen" that "do not reduce lifetime excess cancer risks to the individual most exposed to emissions from a source in the category or subcategory to less than 1-in-1 million," the EPA must promulgate residual risk standards for the source category (or subcategory) as necessary to provide an ample margin of safety to protect public health. In doing so, EPA may adopt standards equal to existing MACT standards, if the EPA determines that the existing standards are sufficiently protective. The EPA must also adopt more stringent standards, if necessary, to prevent an adverse environmental effect, but must consider cost, energy, safety, and other relevant factors in doing so.

Certain records and reports are necessary for the Administrator to confirm the compliance status of sources subject to NESHAP, identify any new or reconstructed sources subject to the standards, and confirm that the standards are being achieved on a continuous basis. These recordkeeping and reporting requirements are specifically authorized by section 114 of the CAA (42 U.S.C. 7414) and set out in the part 63 NESHAP General Provisions (40 CFR Part 63, Subpart A). CAA 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.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting information will be used by Designated Administrators to 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 the emission standard. 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 the standard are used to inform the Designated Administrator when a source becomes subject to the requirements of the regulations. The Designated Administrator 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 to determine compliance.

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart TTTT.

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 Agency in lieu of the report required by the Federal standards. Therefore, no duplication exists.

3(b) Public notice prior to ICR submission to OMB

A public notice of this collection was provided in the *Federal Register* notice of proposed rulemaking published for the Risk and Technology Review of the National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations (83 *FR* 11314, March 14, 2018). No comments were received on the burden published in the *Federal Register*.

3(c) Consultations

The Agency's industry experts were 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 EPA's Enforcement and Compliance History Online (ECHO), which is operated and maintained by EPA's Office of Enforcement and Compliance. ECHO is the EPA's database to provide integrated compliance and enforcement information for about 800,000 regulated facilities nationwide. The EPA uses ECHO for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. ECHO allows users (including the public) to search and obtain information on permits data, inspections, violations, enforcement actions, and penalties. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were contacted and provided an opportunity to review and comment on the burden associated with the current standard as it was being developed, and the standard was previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR for the proposed RTR amendments, we provided all interested parties the opportunity to review and comment on the revised burden estimated in this Information Collection Request as a result of these RTR amendments (83 *FR* 11314, March 14, 2018).

3(d) Effects of Less Frequent Data 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 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 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 five years. In addition, 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 (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 the standard 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 leather finishing operations. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is 3111, which corresponds to the North American Industry Classification System (NAICS) code 316110 for Leather and Hide Tanning and Finishing.

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) as amended. The tables below reflect the final requirements after promulgation of the RTR amendments.

A source must make the following notifications and 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)

Reports	
Annual compliance status certification	63.5420(a)

Reports	
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

Currently sources are using monitoring and reporting equipment that provide 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.

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 are still not widely used. These RTR amendments include a requirement that facilities electing to use a control device to comply with the NESHAP are required to submit performance test results to the EPA through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI) for data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT). The performance test data are required to be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT Web site. No existing leather finishing operations subject to the NESHAP use a control device to comply with the NESHAP. Further, the EPA anticipates that no new leather finishing operations will become subject to the NESHAP in the first three years of the information collection.

(ii) Respondent Activities

Respondent Activities
Read instructions and rule revisions.
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.

Respondent Activities
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.
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.

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 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 standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The records required by this regulation must be retained by the owner/operator for five years.

Information contained in the reports is entered into the EPA's Enforcement and Compliance History Online (ECHO), which is operated and maintained by the EPA's Office of Enforcement and Compliance Assurance. ECHO is the EPA's database to provide integrated compliance and enforcement information for about 800,000 regulated facilities nationwide. Refer to section 3(b) for further discussion about ECHO.

5(c) Small Entity Flexibility

Three of the four 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 these RTR amendments. 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 in below Tables 1 through 3 of Attachment 1.

6. Estimating The Burden And Cost Of The Collection

Tables 1 through 4 of Attachment 1 present an itemization of the burden on the respondents subject to the Leather Finishing Operations NESHAP for the recordkeeping and reporting requirements in the first three years following promulgation of the RTR amendments to the NESHAP. Tables 5 through 8 of Attachment 2 present an itemization of the Agency burden in the first three years following promulgation of the RTR amendments to the Leather Finishing Operations NESHAP. The individual burdens in Tables 1 through 8 of Attachments 1 and 2 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 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 from these recordkeeping and reporting requirements in the first three years following promulgation of the RTR amendments is estimated to be 137 labor hours, as shown in Tables 1 through 4 of Attachment 1. These labor hour estimates are based on Agency studies and background documents from the development of the regulation and these RTR amendments, Agency knowledge and experience with the NESHAP program, and the previously approved ICR.

6(b) Estimating Respondent Costs

The information collection activities for sources subject to these requirements are presented in Tables 1 through 4 of Attachment 1. The total cost for each respondent activity includes labor costs, capital/startup costs, and operating and maintenance (O&M) 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."² 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 from the information collection activities required by the subject standard are labor costs. There are no capital/startup or operation and maintenance costs, because no current leather finishing operations subject to the Leather Finishing Operations NESHAP comply with the NESHAP using a control device, and it is estimated that no sources are expected to start-up over the next three years; therefore, the EPA expects that no leather finishing operations will require any special monitoring or recordkeeping equipment, and no capital and operations and maintenance costs will be associated with the recordkeeping or reporting requirements of the rule.

(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. No current leather finishing operations subject to the Leather Finishing Operations NESHAP have capital/startup or operation and maintenance 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 \$4,374. 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%)

² Available at https://www.bls.gov/oes/current/naics4_316100.htm.

These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes locality rates of pay.³ 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 in Tables 5 through 8 of Attachment 2.

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, four existing respondents will be subject to the standard. No new respondents will become subject to this rule due to the RTR amendments. This estimate is based on the research conducted by the EPA during the subpart TTTT RTR rulemaking, including Agency review of various online databases and information sources, permits, and company websites. Additionally, it is estimated that no sources are expected to start-up over the next three years. The growth rate for the industry is based on our consultations with the Agency’s internal industry experts.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
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 ²	(E) Number of Respondents (E=A+B+C-D)
1	0	4	0	0	4
2	0	4	0	0	4
3	0	4	0	0	4
Average	0	4	0	0	4

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

² Column D is subtracted to avoid double-counting respondents.

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

³ Available at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf.

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
Read and understand rule revisions ¹	4	1	N/A	4
Annual compliance status certification	4	1	N/A	4
Record compliance ratio	4	12	N/A	48
Train personnel	4	1	N/A	4
			Total	60

¹First year only.

The number of Total Annual Responses is 60.

The average annual labor costs are \$12,346. Details regarding this estimate may be found in Tables 1 through 4 of Attachment 2.

6(e) Bottom Line Burden Hours and Cost Tables

(i) The Respondent Tally

The total average annual labor hours for respondents are 137 at an average annual cost of \$12,346. Furthermore, the annual average public reporting and recordkeeping burden for this collection of information is estimated to be 34 hours per respondent and 2 hours per response. Details regarding these estimates may be found in Tables 1 through 4 of Attachment 1.

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 the next three years is estimated to be 92 labor hours at a cost of \$4,374. Details regarding these estimates may be found in Tables 5 through 8 of Attachment 2.

6(f) Reasons for change in burden

There is only a small increase in the labor hours per respondent in this ICR as compared to the previous ICR. This situation is due to two considerations: 1) the RTR amendments introduce a small increase in labor hours to review the amendments; otherwise, 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 a decrease in the estimated labor cost per respondent as compared to the previous ICR. There is a small increase in the labor cost due to the RTR amendments; however, there is a more pronounced decrease in the labor cost that is not due to program changes. The estimated labor cost per respondent is lower than the previous ICR due to use of the most updated and industry-specific labor rates as presented in section 6(b), which are more representative of the leather finishing operations industry. Further, the total cost of the rule for industry is lower than the previous ICR due to a reduction in the estimated number of respondents subject to the Leather Finishing Operations NESHAP. The number of respondents is four as discussed in section 6(d).

6(g) Burden Statement

The annual average public reporting and recordkeeping burden for this collection of information is estimated to be 34 hours per respondent, 1 hour of which is due to the RTR amendments. 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 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-2003-0194. 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) 566-1927. 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-2003-0194 and OMB Control Number 2060-NEW in any correspondence.

PART B OF THE SUPPORTING STATEMENT

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

ATTACHMENT 1

TABLES 1, 2, 3, and 4

Tables 1 - 3: Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Leather Finishing Operations NESHAP – Years 1-3 (Amendments)

Table 4: Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Leather Finishing Operations NESHAP (Amendments)

ATTACHMENT 2

TABLES 5, 6, 7, and 8

Tables 5 - 7: Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Leather Finishing Operations NESHAP - Years 1-3 (Amendments)

Table 8: Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Leather Finishing Operations NESHAP (Amendments)