

**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 1985.10, OMB Control Number 2060-0478.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) were proposed on October 2, 2000; promulgated on February 27, 2002; and most-recently amended on February 12, 2019. These regulations apply to existing and new leather finishing facilities that are major sources of HAP or are collocated with other sources that are individually or collectively a major source of HAP emissions. New facilities include those that commenced either construction or reconstruction after the date of proposal. 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 this part shall maintain a file containing these documents and retain the file for at least five years following the generation date of such maintenance 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.

There are approximately four leather finishing facilities, which are owned and operated by the leather finishing industry (aka: the “Affected Public”). None of the four facilities in the United States are owned by either state, local, or tribal entities or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries. 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 Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal).

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, approximately four respondents per year will be subject to these standards, and no additional respondents per year will become subject to these same standards.

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 hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/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 in order to determine an affected facility's initial capability to comply with these emission standards. Continuous emission monitors are used to ensure compliance with these same standards at all times. During the performance test 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 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 the pollution control devices are properly installed and operated, leaks are being detected and repaired, and that these standards are 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.

Additionally, the EPA is requiring electronic reporting for certain notifications or reports. The EPA is requiring that owners or operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b), change in information for major source to area source reclassification required in 40 CFR 63.9(j), and performance test reports through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For the notifications required in 40 CFR 63.9(b) and 63.9(j), owners and operators would be required to upload a PDF of the required notifications.

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests. The EPA is also requiring that 40 CFR Part 63, Subpart TTTT performance test reports be submitted through the EPA's ERT. Since no current respondents subject to the NESHAP for Leather Finishing Operations comply with the NESHAP using a control device, none of these facilities are required to submit performance tests via the ERT. Additionally, we do not expect that any existing sources will reclassify or that any new sources will become subject to the rule over the next three years.

### **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 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* (FR citation, e.g., 86 FR 8634) on February 8, 2021. No comments were received on the burden published in the *Federal Register* for this renewal.

### **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 the standard, is the Integrated Compliance Information System (ICIS). The ICIS is 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.

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

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, we received comments from both the Leather and Hide Council of America and the Leather Industries of America indicating that no significant changes were needed to the burden estimates in the currently-approved ICR.

### **3(d) Effects of Less-Frequent 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 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**

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 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, 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**

The reporting or recordkeeping requirements in these standards do not include 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 standards is SIC 3111 which corresponds to the North American Industry Classification System (NAICS) 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 are required by the NESHAP for

Leathering Finishing Operations (40 CFR Part 63, Subpart TTTT).

A source must make the following reports:

<b>Notifications</b>	
Initial notification	§§63.5415(b), 63.5415(d), 63.5415(g), 63.9(b)
Notification of intent to construct or reconstruct	§63.9(b)
Notification of actual startup	§§63.5415(d), 63.9(b)
Notification of site-specific test plan	§63.7(c)
Notification of compliance status	§§63.5415(f), 63.9(h)
Notification of intent to conduct a performance test	§§63.5415(e), 63.7(b)
Notification of reclassification to area source status or to revert back to major source status (electronic submission)	§§63.9(b), 63.9(j)

<b>Reports</b>	
Annual compliance status certification	§63.5420(a)
Deviation report	§63.5420(b)
Performance test results (electronic submission)	§§63.5420(c), 63.10(d)

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
Compliance plan	§§63.5430, 63.5325
Maintain records of performance tests	§63.5430(c)
Maintain records of monitoring data for emission control devices	§63.5430(g)

<b>Recordkeeping</b>	

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.

The rule was recently amended to include electronic reporting provisions on February 12, 2019. Respondents are required to use the EPA’s Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA’s Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA’s Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts.

The rule was recently amended to include additional electronic reporting provisions on November 19, 2020. Respondents are required to use the EPA’s CEDRI to submit notification in the event of reclassification to area source status and to sources that revert back to major source status. The notification is a one-time notification already required in 40 CFR 63.9(j) in the case where the facility is notifying of a change in major source status and is an upload of the currently required notification in portable document format (PDF) file. For purposes of this ICR, it is assumed that there is no additional burden associated with the requirement for respondents to submit the notifications and reports electronically.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

**(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate leather finishing operations processes.

<b>Respondent Activities</b>
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) and ICIS.

### **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 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. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. The 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 four respondents are small entities (i.e., small businesses). The impact on small entities was taken into consideration during the development of these regulations. 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 at the end of this document 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 record-keeping and reporting requirements is estimated to be 138 hours (Total Labor Hours from Table 1 below). 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	\$149.84 (\$71.35 + 110%)
Technical	\$122.66 (\$58.41 + 110%)
Clerical	\$60.88 (\$28.99 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, “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 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.

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

The only type of industry costs associated with the information collection activity in these regulations are labor costs. There are no capital/startup or operation and/or 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's overall compliance and enforcement program includes such activities 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 \$4,600.

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

Managerial	\$69.04 (GS-13, Step 5, \$43.15 + 60%)
Technical	\$51.23 (GS-12, Step 1, \$32.02 + 60%)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear at the end of this document 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 four 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 four per year.

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 <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	4	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 four.

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

<b>Total Annual Responses</b>				
(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	0	0
Notification of intent to construct	0	1	0	0
Notification of startup	0	1	0	0
Notification of site-specific test plan	0	1	0	0
Notification of compliance status	0	1	0	0
Annual compliance status certification	4	1	0	4
Deviation report	0	1	0	0
			Total	4

The number of Total Annual Responses is four.

The total annual labor costs are \$16,300. Details regarding these estimates may be found at the end of this document 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 in Tables 1 and 2 at the end of this document, respectively, and summarized below.

#### **(i) 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 for this collection of information is estimated to average 35 hours per response.

The total annual capital/startup and/or 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 92 labor hours at a cost of \$4,600; see below in Table 2: Average 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**

The increase in burden from the most-recently approved ICR is due to an adjustment. This increase is not due to any program changes. The change in the burden and cost estimates occurred because the previous ICR assumed that respondents would only need to familiarize with the regulatory requirements once during the year in which rule revisions occurred, and omitted familiarization with the regulatory requirements in the years following. This ICR assumes that respondents will need to familiarize with the regulatory requirements every year. The overall result is a small increase in burden hours and costs. Aside from this minor change in burden hours, the only other change is due to a slight increase in costs, which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (September 2020) to calculate respondent burden costs.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 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 either 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-2020-0638. An electronic version of the public docket is available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2020-0638 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)**

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical person-hours per year (Cx D)	Management person hours per year (Fx0.05)	Clerical person hours per year (Fx0.1)	Total Cost Per year <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	4	4	0.2	0.4	\$545
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 <sup>d</sup>	1	12	12	0	0	0	0	\$0
Actual HAP loss determination <sup>d</sup>	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 intent to conduct a performance test	2	1	2	0	0	0	0	\$0
Notification of site-specific test plan <sup>e</sup>	2	1	2	0	0	0	0	\$0

Notification of performance test results <sup>f</sup>	2	1	2	0	0	0	0	\$0
Notification of compliance status	12	1	12	0	0	0	0	\$0
Annual compliance status certification <sup>e</sup>	12	1	12	4	48	2.4	4.8	\$6,539.55
Deviation report <sup>g</sup>	5	1	5	0	0	0	0	\$0
<b>Subtotal for Reporting Requirements</b>					<b>60</b>			<b>\$7,085</b>
4. Recordkeeping requirements								
A. Read instructions and rule revisions	See 3A							
B. Develop compliance plan	50	1	50	0	0	0	0	\$0
C. 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 <sup>h</sup>	1	12	12	4	48	2.4	4.8	\$6,539.55
E. Train personnel <sup>i</sup>	5	1	5	4	20	1.0	2.0	\$2,724.81
F. Audits	N/A							
G. Record Deviation Report <sup>g</sup>	1	1	1	0	0	0	0	
<b>Subtotal for Recordkeeping Requirements</b>					<b>78</b>			<b>\$9,264</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>j</sup></b>					<b>138</b>			<b>\$16,300</b>
<b>TOTAL CAPITAL AND O&amp;M COST<sup>j</sup></b>								<b>\$0</b>
<b>GRAND TOTAL (rounded)<sup>j</sup></b>								<b>\$16,300</b>

**Assumptions:**

<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: \$149.84 per hour for Executive, Administrative, and Managerial labor; \$122.66 per hour for Technical labor, and \$60.88 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, "Table 2: Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the



benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed that all respondents will have to familiarize with the regulatory requirements each year.

<sup>d</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>e</sup> We have assumed that it will take each respondent twelve hours once per year to complete the compliance status certification report. For new respondents, the notification of a site-specific test plan is included in the notification of compliance status.

<sup>f</sup> This notification does not apply to existing respondents who do not comply with the NESHAP using a control device. This notification must be developed using the EPA's Electronic Reporting Tool (ERT) and submitted through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI).

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

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

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

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

**Table 2: Average 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 <sup>e</sup>	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 intent to conduct a performance test	4	1	4	0	0	0	0	\$0
e. Notification of site-specific test plan	4	1	4	0	0	0	0	\$0
f. Notification of performance test results <sup>c</sup>	4	1	4	0	0	0	0	\$0
Periodic reports								
a. Review annual compliance status <sup>d</sup>	20	1	20	4	80	4	8	\$4,596.54
b. Review deviation reports <sup>e</sup>	10	1	10	0	0	0	0	\$0
Optional								
Review compliance plan	20	1	20	0	0	0	0	\$0
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>f</sup></b>						<b>92</b>		<b>\$4,600</b>

**Assumptions:**

<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: Managerial rate of \$69.04 (GS-13, Step 5, \$43.15 + 60%), Technical rate of \$51.23 (GS-12, Step 1, \$32.02 + 60%), and Clerical rate of \$27.73 (GS-6, Step 3, \$17.33 + 60%). These rates are from the Office of Personnel Management (OPM) “2021 General Schedule” which excludes locality rates of pay.

<sup>c</sup> We have assumed it will take 4 hours to review each submission of performance test results. This notification does not apply to existing respondents who do not comply with the NESHAP using a control device.

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

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

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