Respondent Wages ($2020)		
Category (1)	**Hourly Mean Wage (2)**	**Loaded Wage (3)**
Technical	$58.41	$122.66
Clerical	$28.99	$60.88
Managerial	$71.35	$149.84

Footnotes:

(1) 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."

(2) The rates are from column 1, "Total compensation."

(3) Loaded Wage is the 2020 Wage increased by 110 percent to account for the benefit packages available to those employed by private industry.

EPA Wages ($2021)		
Category (1)	**Hourly Mean Wage**	**Wage With Fringe & Overhead (2)**
(GS- 12, step 1) - Technical	$32.02	$51.23
(GS- 13, step 5) - Managerial	$43.15	$69.04
(GS-6, step 3) - Clerical	$17.33	$27.73

Footnotes:

(1) These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay.

(2) Wage with fringe and overhead is the hourly mean wage increased by 60 percent to account for the benefit packages available to government employees.

Table 1 - Annual Respondent Burden and Cost - NESHAP for Leather Finishing Operatio (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year [a]
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting requirements				
A. Familiarize with regulatory requirements [c]	1	1	1	4
B. Required activities				
Leather production determination	1	12	12	0
Type of Product process determination	2	4	8	0
Allowable HAP loss determination [d]	1	12	12	0
Actual HAP loss determination [d]	1	12	12	0
C. Create information	N/A			
D. Gather existing information	See 4E			
E. Write Report				
Initial notification	2	1	2	0
Notification of intent to construct	2	1	2	0
Notification of startup	2	1	2	0
Notification of intent to conduct a performance test	2	1	2	0
Notification of site-specific test plan [e]	2	1	2	0
Notification of performance test results [f]	2	1	2	0
Notification of compliance status	12	1	12	0
Annual compliance status certification [e]	12	1	12	4
Deviation report [g]	5	1	5	0
Subtotal for Reporting Requirements				
4. Recordkeeping requirements				
A. Read instructions and rule revisions	See 3A			
B. Develop compliance plan	50	1	50	0
C. Enter information				
Finish inventory	1	12	12	0
HAP content of finish	1	12	12	0
Leather subcategory production levels	1	12	12	0
D. Record compliance ratio [h]	1	12	12	4
E. Train personnel [i]	5	1	5	4
F. Audits	N/A			
G. Record Deviation Report [g]	1	1	1	0
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded) [j]				
TOTAL CAPITAL AND O&M COST [j]				
GRAND TOTAL (rounded) [j]				

Assumptions:

[a] There are four respondents subject to the standard, and no additional new sources will become subject to the rule

[b] This ICR uses the following labor rates: $149.84 per hour for Executive, Administrative, and Managerial labor; $ hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, Se Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been incre available to those employed by private industry.

[c] We have assumed that all respondents will have to familiarize with the regulatory requirements each year.

[d] We have assumed that the burden associated with monthly recording of actual and allowable HAP loss values are

[e] We have assumed that it will take each respondent twelve hours once per year to complete the compliance status notification of a site-specific test plan is included in the notification of compliance status.

[f] This notification does not apply to existing respondents who do not comply with the NESHAP using a control de EPA's Electronic Reporting Tool (ERT) and submitted through the EPA's Compliance and Emissions Data Report

[g] We have assumed that no respondent will submit a deviation report.

[h] We have assumed that each respondent is required to record compliance ratio determination on a monthly basis.

[i] We have assumed that it will take each respondent five hours once per year to train personnel.

[j] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ns (40 CFR Part 63, Subpart TTTT)

(E)	(F)	(G)	(H)
Technical person-hours per year (CxD)	Management person hours per year (Fx0.05)	Clerical person hours per year (Fx0.1)	Total Cost Per year [b]
4	0.2	0.4	$545
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
48	2.4	4.8	###
0	0	0	$0
	60		$7,085
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
48	2.4	4.8	###
20	1.0	2.0	###
0	0	0	
	78		$9,264
	138		$16,300
			$0
			$16,300

over the next three years.

122.66 per hour for Technical labor, and $60.88 per
ptember 2020, "Table 2: Civilian Workers, by
ased by 110% to account for the benefit packages

included in burden item 4D.

certification report. For new respondents, the

vice. This notification must be developed using the
ing Interface (CEDRI).

Table 2 - Annual EPA Burden and Cost - NESHAP for Leather Finishing Operations (40 CFR F TTTT) (Renewal)

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (AxB)	(D) Plants per year [a]	(E) Technical person-hours per year (CxD)	(F) Management person-hours per year (Ex0.05)
Activity						
Review reports						
a. Initial notification	4	1	4	0	0	0
b. Notification of intent to construct	4	1	4	0	0	0
c. Notification of startup	4	1	4	0	0	0
d. Notification of intent to conduct a performance test	4	1	4	0	0	0
e. Notification of site-specific test plan	4	1	4	0	0	0
f. Notification of performance test results [c]	4	1	4	0	0	0
Periodic reports						
a. Review annual compliance status [d]	20	1	20	4	80	4
b. Review deviation reports [e]	10	1	10	0	0	0
Optional						
Review compliance plan	20	1	20	0	0	0
TOTAL ANNUAL BURDEN AND COST (rounded) [f]						**92**

Assumptions:

[a] There are four sources that are subject to the standard, and no additional new sources will become subject to the rule ove

[b] This cost is based on the following labor rates which have been increased by 60 percent to account for the benefit packag government employees: Managerial rate of $69.04 (GS-13, Step 5, $43.15 + 60%), Technical rate of $51.23 (GS-12, Step Clerical rate of $27.73 (GS-6, Step 3, $17.33 + 60%). These rates are from the Office of Personnel Management (OPM) " Schedule" which excludes locality rates of pay.

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

[d] We have assumed that each respondent will take 20 hours to review the annual compliance status certification report.

[e] We have assumed that no respondent will submit a deviation report.

[f] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Part 63, Subpart

(G)	(H)
Clerical person-hours per year (Ex0.1)	**Cost, $ [b]**
0	$0
0	$0
0	$0
0	$0
0	$0
0	$0
8	$4,596.54
0	$0
0	$0
	$4,600

r the next three years.

e available to
1, $32.02 + 60%), and
2021 General

pply to existing

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses
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[d]	0	1	0	0
Annual compliance status certification[e]	4	1	0	4
Deviation report[f]	0	1	0	0
			Total	4

138   hrs

35   hr/response