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 itemPerson hours per occurrencePerson hours per respondent per yearRespondents per year1. ApplicationsN/A2. Survey and StudiesN/A3. Reporting requirements114B. Required activitiesLeather production determination11212Type of Product process determination248Allowable HAP loss determination11212O. C. Create informationN/AD. Gather existing information212O. C. Create information2120Notification of intent to construct2120Notification of startup2120Notification of site-specific test plan "2120Notification of site-specific test plan "2120Notification of performance test results 12120Notification of performance test results 12120Notification of performance test results 1112120Notification of performance test results 12120Notification of performance test results 1112120Notification of performance test results 1112120Notification of performance test results 11100Notification of compliance status515		(A)	(B)	(C)	(D)
2. Survey and StudiesN/AN/A3. Reporting requirements1114. Familiarize with regulatory requirements $^{\circ}$ 111B. Required activities	Burden item	hours per	occurrences per respondent	per respondent per year	
3. Reporting requirements114A. Familiarize with regulatory requirements $^{\circ}$ 1114B. Required activities	1. Applications	N/A			
A. Familiarize with regulatory requirements $^{\circ}$ 1 1 1 4 B. Required activities	2. Survey and Studies	N/A			
B. Required activities 1 12 12 0 Type of Product process determination 2 4 8 0 Allowable HAP loss determination a° 1 12 12 0 Actual HAP loss determination a° 1 12 12 0 Actual HAP loss determination a° 1 12 12 0 C. Create information N/A	3. Reporting requirements				
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 0 D. Gather existing information See 4E 0 Initial notification 2 1 2 0 Notification of intent to construct 2 1 2 0 Notification of startup 2 1 2 0 Notification of startup 2 1 2 0 Notification of startup 2 1 2 0 Notification of stermance test results ' 2 1 2 0 Notification of stermance test results ' 2 1 2 0 Notification of performance test results ' 2 1 2 0 <t< td=""><td>A. Familiarize with regulatory requirements $^{\rm c}$</td><td>1</td><td>1</td><td>1</td><td>4</td></t<>	A. Familiarize with regulatory requirements $^{\rm c}$	1	1	1	4
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 of intent to construct 2 1 2 0 - Notification of intent to conduct a performance 2 1 2 0 - Notification of site-specific test plan * 2 1 2 0 - Notification of performance test results ' 2 1 2 0 - Notification of compliance status 12 1 12 0 - Notification report * 5 1 5 0 - - Annual compliance status certification * 12 1 12 <td>B. Required activities</td> <td></td> <td></td> <td></td> <td></td>	B. Required activities				
Allowable HAP loss determination d 1 12 12 0 Actual HAP loss determination d 1 12 12 0 C. Create information N/A 1 12 0 D. Gather existing information See 4E 1 12 0 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 2 1 2 0 Notification of site-specific test plan * 2 1 2 0 Notification of performance test results ' 2 1 2 0 Notification of compliance status 12 1 12 0 Annual compliance status certification * 12 1 12 4 Deviation report * 5 1 5 0 5 Subtotal for Reporting Requirements	Leather production determination	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 2 1 2 0 Notification of intent to construct 2 1 2 0 Notification of startup 2 1 2 0 0 Notification of startup 2 1 2 0 0 Notification of sterup 2 1 2 0 0 Notification of site-specific test plan * 2 1 2 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	Type of Product process determination	2	4	8	0
C. Create informationN/AD. Gather existing informationSee 4EE. Write ReportInitial notification212Notification of intent to construct212Notification of startup2120Notification of intent to conduct a performance2120Notification of site-specific test plan $^{\circ}$ 2120Notification of compliance test results 1 2120Notification of compliance status121120Notification report $^{\circ}$ 5150Subtotal for Reporting Requirements1120A. Read instructions and rule revisionsSee 3AB. Develop compliance plan501500C. Enter informationFinish inventory112120HAP content of finish112120Leather subcategory production levels112120D. Record compliance ratio h 112124E. Train personnel 1 5154F. AuditsN/A	Allowable HAP loss determination ^d	1	12	12	0
D. Gather existing informationSee 4EE. Write Report12120Initial notification2120Notification of intent to construct2120Notification of startup2120Notification of intent to conduct a performance2120Notification of site-specific test plan °2120Notification of site-specific test plan °2120Notification of compliance test results '2120Notification of compliance status121120Annual compliance status certification °121124Deviation report ®5150Subtoal for Reporting Requirements4. Recordkeeping requirements51500C. Enter information	Actual HAP loss determination ^d	1	12	12	0
E. Write ReportImitial notification2120Initial notification2120Notification of intent to construct2120Notification of startup2120Notification of intent to conduct a performance test2120Notification of site-specific test plan $^{\circ}$ 2120Notification of performance test results t 2120Notification of compliance status121120Annual compliance status certification $^{\circ}$ 121124Deviation report s 5150Subtoal for Reporting Requirements4. Recordkeeping requirementsA. Read instructions and rule revisionsSee 3AB. Develop compliance plan501500C. Enter information </td <td>C. Create information</td> <td>N/A</td> <td></td> <td></td> <td></td>	C. Create information	N/A			
Initial notification2120Notification of intent to construct2120Notification of starup2120Notification of intent to conduct a performance test2120Notification of site-specific test plan °2120Notification of site-specific test plan °2120Notification of performance test results '2120Notification of compliance status121120Annual compliance status certification °121124Deviation report °5150Subtoal for Reporting RequirementsA. Read instructions and rule revisionsSee 3AB. Develop compliance plan501500C. Enter informationFinish inventory112120HAP content of finish112120Leather subcategory production levels112120D. Record compliance ratio °112124E. Train personnel '5154F. AuditsN/AG. Record Deviation Report *1110	D. Gather existing information	See 4E			
Notification of intent to construct2120Notification of startup2120Notification of intent to conduct a performance test2120Notification of site-specific test plan $^{\circ}$ 2120Notification of performance test results i 2120Notification of compliance status121120Annual compliance status certification $^{\circ}$ 121124Deviation report $^{\circ}$ 5150Subtotal for Reporting Requirements4. Recordkeeping requirements91500C. Enter information5015000C. Enter information1121200HAP content of finish1121200Leather subcategory production levels112120D. Record compliance ratio h 112124E. Train personnel i 5154F. AuditsN/A110	E. Write Report				
Notification of startup2120Notification of intent to conduct a performance test2120Notification of site-specific test plan $^{\circ}$ 2120Notification of performance test results t 2120Notification of compliance status121120Annual compliance status certification $^{\circ}$ 121124Deviation report $^{\circ}$ 5150Subtoal for Reporting Requirements4. Recordkeeping requirements4. Recordkeeping requirementsSee 3A-B. Develop compliance plan501500C. Enter informationFinish inventory112120HAP content of finish112120Leather subcategory production levels112124E. Train personnel i 5154F. AuditsN/AG. Record Deviation Report $^{\circ}$ 1110	Initial notification	2	1	2	0
Notification of intent to conduct a performance test2120Notification of site-specific test plan $^{\circ}$ 2120Notification of performance test results i 2120Notification of compliance status121120Annual compliance status certification $^{\circ}$ 121124Deviation report $^{\circ}$ 5150Subtotal for Reporting Requirements4. Recordkeeping requirementsA. Read instructions and rule revisionsSee 3AB. Develop compliance plan501500C. Enter informationFinish inventory112120HAP content of finish112120D. Record compliance ratio h 112124E. Train personnel i 5154F. AuditsN/AG. Record Deviation Report 6 1110	Notification of intent to construct	2	1	2	0
test 1 2 1 2 0 Notification of site-specific test plan ° 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 ° 12 1 12 4 Deviation report ° 5 1 5 0 Subtotal for Reporting Requirements	Notification of startup	2	1	2	0
Notification of performance test results f2120Notification of compliance status121120Annual compliance status certification °121124Deviation report °5150Subtotal for Reporting Requirements4. Recordkeeping requirements5150A. Read instructions and rule revisionsSee 3AB. Develop compliance plan501500C. Enter information </td <td></td> <td>2</td> <td>1</td> <td>2</td> <td>0</td>		2	1	2	0
Notification of compliance status121120Annual compliance status certification °121124Deviation report °5150Subtotal for Reporting Requirements4. Recordkeeping requirementsA. Read instructions and rule revisionsSee 3A	Notification of site-specific test plan ^e	2	1	2	0
Annual compliance status certification e121124Deviation report g5150Subtotal for Reporting Requirements51504. Recordkeeping requirements </td <td>Notification of performance test results ^f</td> <td>2</td> <td>1</td> <td>2</td> <td>0</td>	Notification of performance test results ^f	2	1	2	0
Deviation report §5150Subtotal for Reporting Requirements4. Recordkeeping requirementsA. Read instructions and rule revisionsSee 3A	Notification of compliance status	12	1	12	0
Deviation report §5150Subtotal for Reporting Requirements4. Recordkeeping requirementsA. Read instructions and rule revisionsSee 3A	Annual compliance status certification ^e	12	1	12	4
Subtotal for Reporting Requirements4. Recordkeeping requirementsImage: Colspan="2">Image: Colspan="2" Image: C		5	1	5	0
4. Recordkeeping requirementsSee 3AImage: Construction of the second seco	Subtotal for Reporting Requirements		I		
A. Read instructions and rule revisionsSee 3AImage: constraint of the set of					
B. Develop compliance plan 50 1 50 0 C. Enter information		See 3A			
C. Enter information 1 12 12 0 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 0			1	50	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 0 G. Record Deviation Report g 1 1 1 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 0 G. Record Deviation Report g 1 1 1 0	Finish inventory	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		1	12	12	0
E. Train personnel ¹ 5 1 5 4 F. Audits N/A G. Record Deviation Report ^g 1 1 1 0		1	12	12	0
F. Audits N/A Image: N/A G. Record Deviation Report ^g 1 1 1 0	D. Record compliance ratio ^h	1	12	12	4
F. Audits N/A Image: N/A G. Record Deviation Report ^g 1 1 1 0	E. Train personnel ⁱ	5	1	5	4
G. Record Deviation Report ^g 1 1 1 0		N/A			
			1	1	0
	-				
TOTAL LABOR BURDEN AND COST (rounded)					
TOTAL CAPITAL AND O&M COST ^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		ΨΟ
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	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

e 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)

	(A)	(B)	(C)	(D)	(E)	(F)
Activity	EPA person- hours per occurrenc e	No. of occurrenc es per plant per year	EPA person- hours per plant per year (AxB)	Plants per year ^a	Technical person- hours per year (CxD)	Managem ent 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) f92						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_j 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