SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR Part 63, Subpart N) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR Part 63, Subpart N) (Renewal), EPA ICR Number 1611.13, OMB Control Number 2060-0327.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR Part 63, Subpart N) were proposed on December 16, 1993; promulgated on January 25, 1995; and most-recently amended on November 19, 2020 (85 FR 73889)[1]. These regulations apply to existing facilities and new facilities. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart N.

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 this 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.

The 'burden' to the "Affected Public" may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR Part 63, Subpart N) (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:

1 The November 19, 2020 amendments allow for reclassification of major sources to area sources (and back to major sources) provided the applicability of standards, compliance dates, and notification requirements are followed. These amendments do not impose any new or additional information collection burden on subject sources.

Average Annual EPA Burden and Cost – NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR Part 63, Subpart N) (Renewal). There are approximately 1,343 chromium electroplating and anodizing facilities, which are owned and operated by the chromium electroplating and chromium anodizing tank industry. This estimate consists of 652 hard chromium electroplating facilities, 517 decorative chromium electroplating facilities, and 174 chromium anodizing facilities. None of the 1,343 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.

Over the next three years, approximately 1,343 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, chromium emissions from chromium electroplating and chromium anodizing tanks 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 N.

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 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 its delegated authority when a source becomes subject to the requirements of the 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 the standards are being met. The performance test may also be observed.

The required quarterly, semiannual, and 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 required for major source to area source reclassification required in 40 CFR 63.9(j), and performance test reports including fluid analyses 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 N performance test reports be submitted through the EPA's ERT.

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

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

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* (86 FR 19256) on April 13, 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 these standards, is the Integrated Compliance Information System (ICIS). 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 1,343 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 that these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the National Association for Surface Finishing (NASF), at (202) 457-8404, and Coventya, at (216) 351-1500.

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, no comments were received.

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 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 sources performing hard chromium electroplating, decorative chromium electroplating, and chromium anodizing operations. The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standards are listed below:

Standard (40 CFR 63, Subpart N)	**SIC Codes**	**NAICS Codes**
Electroplating, Plating, Polishing, Anodizing, and Coloring	3471	332813
Hand and Edge Tool Manufacturing	3423	332212
Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	3479	332812
Fluid Power Cylinder and Actuator Manufacturing	3593	333995

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR Part 63, Subpart N).

A source must make the following reports:

Notifications	
Notification of construction/reconstruction	§63.5(a); §63.5(b); §63.5(d); §63.345
Notification of initial startup	§63.347(c)
Notification of initial performance test	§63.347(d)
Reschedule of initial performance test	§63.7(b)(2)
Notification of compliance status	§63.347(e)
Notification of reclassification from major source to area source (and back to major source, if applicable) (electronic submission)	§63.9(b); §63.9(j)
Request for extension of compliance status, adjustments to time periods, and changes in information	§63.9(c); §63.9(i); §63.9(j); §63.343(a)(6)

Reports	
Initial performance test results (electronic submission)	§63.347(f)
Operation and maintenance plan	§63.342(f)(3); §63.347(g)(3)
Submission of site-specific test plan upon request	§63.344(a)
Ongoing semiannual compliance status reports for major sources, unless the source is required to submit it on a more frequent basis (e.g.,	§63.347(g)

Reports	
quarterly reports are required when an emission limit is exceeded), except for sources using trivalent chromium baths	
Ongoing annual compliance status reports for area sources, unless the source is required to submit it on a more frequent basis (e.g., semiannual reports are required when the duration of an excess emissions is one percent or greater of the total operating time), except for sources using trivalent chromium baths	§63.347(h)
Request to reduce reporting frequency of ongoing compliance status reports	§63.347(g)(2); §63.347(h)(2)
Reports associated with trivalent chromium baths	§63.347(i)

A source must keep the following records:

Recordkeeping	
General recordkeeping requirements (e.g., startups, shutdowns and malfunctions including process equipment, air pollution control equipment, maintenance performed, and actions taken outside of the scope of the existing plans, records of monitoring data used to demonstrate compliance, performance test results, documentation supporting notifications and reports).	§63.346(a); §63.346(b)(1)-(10) §63.10(b)(1)
Records of total process operating time of the affected source.	§63.346(b)(11)
Records of actual cumulative rectifier capacity of hard chromium electroplating tanks expended during each month, and for owner/operators who use actual cumulative rectifier capacity to determine facility size, records of total capacity expended to date.	§63.346(b)(12)
If using fume suppressants to comply, records of date and time that fume suppressants are added to the electroplating or anodizing bath, and records of product name and manufacturer.	§63.346(b)(13)
For decorative chromium electroplating tanks using trivalent chromium bath, records of bath components purchased, including the wetting agent.	§63.346(b)(14)
Records for sources with continuous monitoring systems	§63.346(b)
Records are required to be retained for 5 years. The first 2 years of records must be kept on site.	§63.10(b)(1); §63.346(c)

<u>Electronic Reporting</u>

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 amended to include electronic reporting provisions on September 19, 2012. 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 also required to submit electronic copies of notifications and certain reports through EPA's CEDRI. 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 also an upload of their 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 proposed 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

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate a monitoring system for pressure drop across composite mesh-pad systems and fiber-bed mist eliminators, pressure drop and velocity pressure of packed-bed scrubbers, surface tension for wetting agents, foam blanket thickness for foam blanket-type fume suppressants, or the appropriate parameter for an alternative control option.
Perform initial performance test, Reference Method 306, 306(a) or 306(b) test, and repeat performance tests if necessary.
Write the notifications and reports listed above.

Respondent Activities
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:

Agency Activities
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 and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual 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

The majority of the respondents are small businesses. The recordkeeping and reporting requirements were selected within the context of this specific subpart and the specific process equipment and pollutant. The impact on small businesses was accounted for in the regulation development. Reduction in reporting was provided to small businesses subject to this regulation. Small (area source) businesses are only required to prepare annual compliance status reports and may retain these reports on site. These reports must be submitted to either the Agency or a delegated authority on a semiannual basis only where the duration of excess emissions and air pollution control device malfunctions exceeds specified thresholds. Large (major source) facilities must prepare and submit these reports on a semiannual or quarterly basis depending on their performance.

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 Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR Part 63, Subpart N) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of 'Burden' under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 242,000 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	$153.55 ($73.12 + 110%)
Technical	$122.20 ($58.19 + 110%)
Clerical	$61.51 ($29.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, "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 type of industry costs associated with the information collection activities in the subject standard(s) are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

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

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

(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Operating Parameter Monitoring	$0	0	$0	$15,000	1,343	$20,100,000

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
Systems						
Stalagmometer/ tensiometer calibration and cleaning	$0	0	$0	$213.96	1,343	$287,000
Total			$0			**$20,400,000**

Note: Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are $0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $20,400,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be $20,400,000. These are the recordkeeping 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 $196,000.

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 for NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR Part 63, Subpart N) (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 1,343 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 1,343 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 [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	(E) Number of Respondents (E=A+B+C-D)
1	0	1,291	52	0	1,343
2	0	1,291	52	0	1,343
3	0	1,291	52	0	1,343
Average	0	1,291	52	0	1,343

[1] 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 1,343.

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

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
Ongoing compliance status reports	1,033	1	52	1,085
Reports of exceedances	258	2	0	516
Request to reduce report frequency of ongoing compliance status reports	129	1	0	129

Total Annual Responses				
			Total	1,730

*We assume that all sources are area sources. Area sources, except for 52 decorative chromium electroplating plants using trivalent chromium bath, (1,343 – 52 = 1,291) are required to submit an annual compliance status report. However, sources are required to submit these reports on a more frequent basis if excess emissions occur (i.e., semiannually for area sources). We further assume 80 percent of the sources (0.80 times 1,291 yields 1,033) will have no excess emissions and 20 percent of the sources (0.20 times 1,291 yields 258) will have excess emissions. Finally, we assume half of the area sources submitting semiannual reports due to excess emissions (0.5 times 258 yields 129) will request the regulatory agency to approve a reduction in frequency of ongoing compliance status reports (i.e., annual reporting).

The number of Total Annual Responses is 1,730. No respondents have been double counted as there are no predicted, new affected facilities during the course of this ICR renewal.

The total annual labor costs are $28,600,000. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost for NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR Part 63, Subpart N) (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 242,000 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost for NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR Part 63 Subpart N) (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 140 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $20,400,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 3,920 labor hours at a cost of $196,000; see below in Table 2: Average Annual EPA Burden and Cost for NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR Part 63, Subpart N) (Renewal).

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

6(f) Reasons for Change in Burden

There is no change in 'burden' from the most-recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This situation is due to two considerations: 1) 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 this industry is very low or non-existent, so there is no significant change in the overall burden. Since there are no changes in the regulatory requirements and there is no significant industry growth, there are also no changes in the capital/startup and/or operation and maintenance (O&M) costs. There is 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 (March 2021) 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 140 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-2021-0089. 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. Due to COVID-19 precautions, entry to the Reading Room is available by appointment only. Please contact personnel in the Reading Room to schedule an appointment. 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-2021-0089 and OMB Control Number 2060-0327 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 for NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR Part 63, Subpart N) (Renewal)

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year[a]	(E) Technical Hours per Year (E=C x D)	(F) Management Hours per Year (F= E x 0.05)	(G) Clerical Hours per Year (G= E x 0.1)	Total Labor Costs per Year [b]
1. APPLICATIONS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2. SURVEY AND STUDIES	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3. ACQUISITION, INSTALLATION, AND UTILIZATION OF TECHNOLOGY AND SYSTEMS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4. REPORTING REQUIREMENTS								
A. Familiarization with Regulatory Requirements	1	1	1	1,343	1343	67.15	134.3	$182,686.28
B. Required Activities	-							
Performance test[c]	----------See 4E----------							
Monitoring of operations equipment [d]	----------See 5E----------							
C. Create Information	----------See 4B and 5E----------							
D. Gather Existing Information	----------See 4B and 5E----------							N/A
E. Write Report [a,e]								
Notification of compliance status	2	1	2	0	0	0	0	$0
Notification of actual startup	2	1	2	0	0	0	0	$0

Notification of construction / reconstruction	2	1	2	0	0	0	0	$0
Notification of performance test	2	1	2	0	0	0	0	$0
Performance test report	4	1	4	0	0	0	0	$0
Operation and maintenance plan	10	1	10	0	0	0	0	$0
Annual compliance status reports for area sources [f, g]	4	1	4	1,033.04	4,132.16	206.61	413.22	$562,091.53
Semiannual reports of exceedances for area sources [g]	8	2	16	258.26	4,132.16	206.61	413.22	$562,091.53
Semiannual compliance status reports for major sources [h]	8	2	16	0	0	0	0	$0
Quarterly compliance status reports for major sources [h]	8	4	32	0	0	0	0	$0
Request to reduce report frequency [g]	2	1	2	129.13	258.26	12.91	25.83	$35,130.72
Subtotal for Reporting Requirements						**11,345**		**$1,342,000**
5. RECORDKEEPING REQUIREMENTS								
A. Familiarization of Regulatory Requirements	----------See 4A----------							
B. Plan Activities	----------See 4B----------							
C. Implement Activities	----------See 4B----------							
D. Develop Record System	40	1	40	0	0	0	0	$0
E. Time to Enter and Transmit Information								
Records of monitoring:								
- Composite mesh pad/packed scrubber [i]	0.5	250	125	639.49	79,936.13	3,996.81	7,993.61	$10,873,591.18
- Wetting agents (normal schedule) [j,k]	0.25	1000	250	465.57	116,393.63	5,819.68	11,639.36	$15,832,850.22
- Wetting agents (reduced	0.25	100	25	51.73	1,293.26	64.66	129.33	$175,920.56

frequency schedule) [j,k]								
- Foam Blankets (normal schedule) [l]	0.25	4000	1000	0	0	0	0	$0
- Foam Blankets (reduced frequency schedule) [l]	0.25	500	125	0	0	0	0	$0
- Excess emissions	----------See 4E----------							
Records of operations: [m]								
- Operation and maintenance	1	4	4	639.49	2557.96	127.90	255.80	$347,954.92
- Cumulative rectifier capacity	----------See 4E----------							
- Records of trivalent chromium bath purchases [n]	0.5	12	6	51.70	310.20	15.51	31.02	$42,196.04
F. Time to train personnel	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
G. Time for Audits	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Subtotal for Recordkeeping Requirements					**230,565**			**$27,272,513**
TOTAL LABOR BURDEN AND COST (rounded)[o]					**242,000**			**$28,600,000**
TOTAL CAPITAL/O&M COST (rounded)[o]								**$20,400,000**
GRAND TOTAL (rounded)[o]								**$49,000,000**

[a] There are an estimated total of 1,343 chromium electroplating and anodizing operations nationwide. Of this total, approximately 652 are hard chromium electroplating operations, 517 are decorative chromium electroplating operations, and 174 are chromium anodizing operations. No net growth is predicted for this industry. It is expected that new tanks will only be added to replace or expand existing capacity. The ongoing monitoring, reporting, and recordkeeping for new tanks is the same as that for existing tanks.

[b] This ICR uses the following labor rates: $153.55 per hour for Executive, Administrative, and Managerial labor; $122.20 per hour for Technical labor, and $61.51 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021 "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.

[c] Sources are required to conduct performance tests using Methods 306 or 306A of Appendix A, or the California Air Resources Board (CARB) Method 425 or SCAQMD Method 205.1, as an alternative, Method 306B, and alternate methods if the method has been validated using Method 301 of Appendix A.

[d] Sources are required to follow work practice standards at composite-mesh-pad (CMP) systems, packed-bed scrubbers (PBS), PBS/CMP systems, fiber-bed mist eliminators, and other air pollution control devices not listed in the rule, as well as monitoring operational parameters (i.e., pressure drop for composite

mesh pad systems and fiber bed mist eliminators; pressure drop and velocity pressure for packed bed scrubbers, surface tension for wetting agents, thickness of the foam for foam blanket fume suppressants, or the appropriate parameter for an alternative control option) and monitoring equipment.

[e] Since there are no new respondents estimated, these requirements do not apply.

[f] All sources, except decorative chromium electroplating plants using trivalent chromium bath (1,343 - 51.7 = 1,291.3), are required to submit compliance status reports. Area sources are required to submit an annual compliance status report and major sources a semiannual compliance status report.

[g] If excess emissions occur at the plant, sources are required to submit reports on a more frequent basis (i.e., semiannually for area sources and quarterly for major sources) until the regulatory agency has approved the source request to reduce frequency of ongoing compliance status reports. We have assumed that 80 percent of the sources (0.80 x 1,291.3 = 1,033.04) will have no excess emissions and 20 percent of the sources (0.20 x 1,291.3 = 258.26) will have excess emissions. We have also assumed that half of the area sources submitting semiannual reports due to excess emissions (0.5 x 258 = 129.13) will request the regulatory agency to approve a reduction in frequency for ongoing compliance status reports (i.e., back to annual reporting).

[h] We have assumed that all sources are area sources.

[i] We have assumed that the monitoring required for composite mesh pad/packed bed scrubbers occurs once per day, 5 five days a week, 50 weeks per year for all plants with add-on control devices. The number of facilities with add-on control devices is estimated to be 639.49 based on the assumption that 84 percent of hard chromium electroplating facilities (84% of 652 = 547.68), 13 percent of the decorative chromium electroplating that use hexavalent chromium bath (13% of 465.3 = 60.49) and 18 percent of chromium anodizing facilities (18% of 174 = 31.32) will use add-on control devices.

[j] We have assumed that 85 percent of decorative chromium electroplating plants that use hexavalent chromium bath (85% of 465.3 = 395.51) and 70 percent of chromium anodizing plants (70% of 174 = 121.8) will use wetting agents for a total of 517.31 sources.

[k] We have assumed that area sources using wetting agents will be required to monitor once every four hours for two 8-hours shifts (a 16-hour day), five days a week, 50 weeks per year per operating schedule if the source is on a regular monitoring schedule. If the source is on a reduced monitoring schedule, it will be required to monitor once every 40 hours for 16-hour day, five days a week, 50 weeks per year per operating schedule. We have assumed that 90 percent of the sources (90% of 517.31 = 465.57) will be on a normal schedule and 10 percent of the sources (10% of 517.31 = 51.73) are on a reduced schedule.

[l] We have assumed that sources will not elect to use foam blankets because the rule requires them to do compliance testing. If sources elect to use foam blankets, the reduced monitoring schedule will require them to monitor once every 8 hours, per 16-hour day, five days a week, 50 weeks per year per operating schedule. If the source is on a normal monitoring schedule it will be required to monitor once every hour, per 16-hour day, five days a week, 50 weeks per year per operating schedule.

[m] We have assumed that all facilities with add-on control devices (639.49) would be required to have an approved Operation and Maintenance Plan for their operations.

[n] We have assumed that 10 percent of the decorative chromium electroplating plants (10% of 517 = 51.7) use trivalent chromium baths and 90 percent use hexavalent chromium baths (90% of 517 = 465.3).

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

Table 2: Average Annual EPA Burden and Cost for NESHAP for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR Part 63, Subpart N) (Renewal)

Burden Item	(A) EPA Hours per Occurence (Technical hours)	(B) Number of Occurences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year [a]	(E) Technical Hours per Year (E=C x D)	(F) Management Hours per Year (F= E x 0.05)	(G) Clerical Hours per Year (G= E x 0.1)	Costs per Year [b]
Notification of Compliance Status [c]	2	1	2	0	0	0	0	$0
Notification of Actual Startup	2	1	2	0	0	0	0	$0
Notification of construction/ reconstruction	2	1	2	0	0	0	0	$0
Operation and maintenance plan [d]	2	1	2	0	0	0	0	$0
Notification of Performance Test [c]	2	1	2	0	0	0	0	$0
Reports of Performance Test results [c]	2	1	2	0	0	0	0	$0
Report Review-								
Plant records of fume suppressant use [e] (2012 amendment)	2	1	2	26.00	52.00	2.60	5.20	$2,987.66
Annual compliance status reports for area sources [f, g]	2	1	2	1033.04	2066.08	103.30	206.61	$118,706.63
Semiannual reports of exceedances for area sources [f, g]	2	2	4	258.26	1033.04	51.65	103.30	$59,353.31
Semiannual compliance status reports for major sources [h]	2	1	2	0	0	0	0	$0
Quarterly compliance status reports for major sources	2	1	2	0	0	0	0	$0
Request to reduce report frequency [g]	2	1	2	129.13	258.26	12.91	25.83	$14,838.33
TOTAL ANNUAL BURDEN (rounded[i])					**3,920**			**$196,000**

[a] There are an estimated total of 1,343 chromium electroplating and anodizing operations nationwide. Of this total, approximately 652 are hard chromium electroplating operations, 517 are decorative chromium electroplating operations, and 174 are chromium anodizing operations. No net growth is predicted for this industry. It is expected that new tanks will only be added to replace or expand existing capacity. The ongoing monitoring, reporting, and recordkeeping for new tanks is the same as that for existing tanks.

[b] This cost is based on the following hourly labor rates: $69.04 for Managerial (GS-13, Step 5, $43.15+ 60%), $51.23 for Technical (GS-12, Step 1, $32.02 + 60%) and $27.73 for Clerical (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% to account for the benefit packages available to government employees.

[c] Since there are no new respondents estimated, these requirements do not apply.

[d] There will be no periodic burden for the regulatory agency associated with this requirement although we have assumed that all facilities with add-on control devices (639) would be required to have an approved Operation and Maintenance Plan for its operations.

[e] Assumes Agency will review records of 5% of the 540 plants that use fume suppressants (540 x 0.05 = 26) (as estimated based on the 2012 Final Rule, see ICR No. 1611.10) to confirm that non-PFOS fume suppressants are being used.

[f] All sources, except decorative chromium electroplating plants using trivalent chromium bath (1,343 - 51.7 = 1,291.3), are required to submit compliance status reports. Area sources are required to submit an annual compliance status report and major sources a semiannual compliance status report.

[g] If excess emissions occur at the plant, sources are required to submit reports on a more frequent basis (i.e., semiannually for area sources and quarterly for major sources) until the regulatory agency has approved the source request to reduce frequency of ongoing compliance status reports. We have assumed that 80 percent of the sources (0.80 x 1,291.3 = 1,033.04) will have no excess emissions and 20 percent of the sources (0.20 x 1,291.3 = 258.26) will have excess emissions. We have also assumed that half of the area sources submitting semiannual reports due to excess emissions (0.5 x 258 = 129.13) will request the regulatory agency to approve a reduction in frequency for ongoing compliance status reports (i.e., back to annual reporting).

[h] We have assumed that all sources are area sources.

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