

U.S. Environmental Protection Agency

Information Collection Request

TITLE: NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal)

OMB CONTROL NUMBER: 2060-0478

EPA ICR NUMBER: 1985.11

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.

Supporting Statement A

1. NEED AND AUTHORITY FOR THE COLLECTION:

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate 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 cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart TTTT.

2. PRACTICAL UTILITY/USERS OF THE DATA:

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The recordkeeping and reporting requirements in the 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 the emission standards. Continuous emission monitors are used to ensure compliance with the 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 the standards are used to inform the Agency or 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 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.

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), performance test reports required in 40 CFR 63.5420(c)(1), and notifications of changes in information for major source to area source reclassification required in 40 CFR 63.9(j) 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. EPA is also requiring that 40 CFR Part 63, Subpart TTTT performance test reports be submitted through the EPA's ERT.

3. USE OF TECHNOLOGY:

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

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 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. Respondents are also required to submit electronic copies of notifications and certain reports through EPA's CEDRI. Respondents are also required to use the EPA's CEDRI to submit a notification in the event of reclassification to area source status and for 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. The supplemental files to this ICR renewal contain screenshots showing the CDX homepage for CEDRI login, the CEDRI PRA screen, the CEDRI interface for managing reports for various subparts, and the landing page of the ERT that shows the link to PRA information.

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>.

4. EFFORTS TO IDENTIFY DUPLICATION:

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, 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 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.

5. MINIMIZING BURDEN ON SMALL ENTITIES:

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

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.

6. EFFECTS OF LESS FREQUENT COLLECTION:

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

7. GENERAL GUIDELINES:

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with PRA Guidelines at 5 CFR 1320.5(d)(2).

With the following exception, these reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

8. PUBLIC COMMENT AND CONSULTATIONS:

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (88 FR 31748) on May 18, 2023. No comments were received on the burden published in the *Federal Register* for this renewal.

8b. Consultations

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

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). 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 the standard 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 the standard as it was being developed and the standard has been previously reviewed 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. In this case, no comments were received.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

9. PAYMENTS OR GIFTS TO RESPONDENTS:

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

The Agency does not intend to provide payments or gifts to respondents as part of this collection.

10. PROVISIONS FOR PROTECTION OF INFORMATION:

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

11. JUSTIFICATION FOR SENSITIVE QUESTIONS:

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

12. RESPONDENT BURDEN HOURS AND LABOR COSTS:

Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.
 - If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.
 - Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.
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12a. RESPONDENTS/NAICS CODES

The respondents to the recordkeeping and reporting requirements are leather finishing operations. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards is SIC 3111 which corresponds to the North American Industry Classification System (NAICS) 316110 for Leather and Hide Tanning and Finishing.

Based on our research for this ICR, on average over the next three years, approximately four existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. 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 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	4	0	0	4

Number of Respondents					
2	0	4	0	0	4
3	0	4	0	0	4
Average	0	4	0	0	4

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

Number of respondents is calculated using the following table which addresses each of the three years covered by this ICR.

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

The number of Total Annual Responses is four.

12b. INFORMATION REQUESTED

In this ICR, all the data that are recorded or reported is required by the NESHAP for Leathering Finishing Operations (40 CFR Part 63, Subpart TTTT).

A source must make the following reports:

Notifications	
Initial notification	§§63.5415(b), 63.5415(d), 63.5415(g), 63.9(b)
Notification of intent to construct or reconstruct	§63.9(b)(iii)
Notification of actual startup	§63.5415(b),(d), 63.9(b)(4)-(5)
Notification of site-specific test plan	§63.7(c)(2)
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)
Notification of changes in information (reclassification to area source status or to revert to major source status) (electronic submission)	§63.9(b), §63.9(j)

Reports	
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:

Recordkeeping	
Maintain records of finish inventory	§§63.5430(d), 63.5335(b)
Maintain records of HAP content	§§63.5430(e), 63.5390
Maintain records of leather inventory	§§63.5430(f), 63.5400
Record 12 months compliance ratio	§§63.5330, 63.5430(h)
Compliance plan	§§63.5430(a), 63.5325

Recordkeeping	
Maintain records of performance tests	§63.5430(c)
Maintain records of monitoring data for emission control devices	§63.5430(g)

12c. RESPONDENT ACTIVITIES

- Familiarization with the regulatory requirements.
- Install, calibrate, maintain, and operate leather finishing operations processes.
- Perform initial performance test, Reference Method 24 and 311 tests, and repeat performance tests if necessary.
- Write the notifications and reports listed above.
- Enter information required to be recorded above.
- 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.

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).

12d. RESPONDENT BURDEN HOURS AND LABOR COSTS

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 138 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.

This ICR uses the following labor rates:

Managerial	\$163.17 (\$77.70 + 110%)
Technical	\$130.28 (\$62.04 + 110%)
Clerical	\$65.71 (\$31.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, “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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

The total annual labor hours are 138. Details regarding these estimates may be found 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.

13. RESPONDENT CAPITAL AND O&M COSTS:

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

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.

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.

14. AGENCY COSTS:

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such

as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

- 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.

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 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. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. 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.

14b. Agency Burden and Labor Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$4,890.

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

Managerial	\$73.46 (GS-13, Step 5, \$45.91 + 60%)
Technical	\$54.51 (GS-12, Step 1, \$34.07 + 60%)
Clerical	\$29.50 (GS-6, Step 3, \$18.44 + 60%)

These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear 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).

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.

14c. Agency Non-Labor Costs

There are no anticipated non-labor costs for the Agency.

14d. Agency Total Costs

The average annual Agency burden and cost over next three years is estimated to be 92 labor hours at a cost of \$4,890. See Table 2: Average Annual EPA Burden and Cost – NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal).

15. CHANGE IN BURDEN:

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

There is no change in burden from the most recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Second, the growth rate for the industry is very low, negative, or non-existent, so there is no significant change in the overall burden. There is a 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 2022) to calculate respondent burden costs.

16. PUBLICATION OF DATA:

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Although this rule does not require electronic reporting, respondents could choose to submit notifications or reports electronically. All non-CBI data submitted electronically to the Agency through CEDRI are available to the public for review and printing and are accessible using WebFIRE. Electronically submitted emissions data from performance testing or performance evaluations using the Electronic Reporting Tool or templates attached to CEDRI, as well as data from reports from regulations with electronic templates, are tabulated; data submitted as portable document format (PDF) files attached to CEDRI are neither tabulated nor subject to complex analytical techniques. Electronically submitted emissions data used to develop emissions factors undergo complex analytical techniques and the draft emissions factors are available on the Clearinghouse for Inventories and Emission Factors listserv at <https://www.epa.gov/chief/chief-listserv> for public review and printing. Electronically submitted emissions data, as well as other data, obtained from one-time or sporadic information collection

requests often undergo complex analytical techniques; results of those activities are included in individual rulemaking dockets and are available at <https://www.regulations.gov/> for public review and printing.

17. DISPLAY OF OMB CONTROL NUMBER AND EXPIRATION DATE ON INSTRUMENTS:

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. CERTIFICATION STATEMENT:

Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.

ADDITIONAL TABLES AND APPENDICES

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 ^a	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 ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements ^c	1	1	1	4	4	0.2	0.4	\$580
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 ^d	1	12	12	0	0	0	0	\$0
Actual HAP loss determination ^d	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 ^e	2	1	2	0	0	0	0	\$0
Notification of performance test results ^f	2	1	2	0	0	0	0	\$0
Notification of compliance status	12	1	12	0	0	0	0	\$0
Annual compliance status certification ^e	12	1	12	4	48	2.4	4.8	\$6,960
Deviation report ^g	5	1	5	0	0	0	0	\$0
Subtotal for Reporting Requirements						60		\$7,540
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 ^h	1	12	12	4	48	2.4	4.8	\$6,960
E. Train personnel ⁱ	5	1	5	4	20	1.0	2.0	\$2,900
F. Audits	N/A							
G. Record Deviation Report ^g	1	1	1	0	0	0	0	
Subtotal for Recordkeeping Requirements						78		\$9,861
TOTAL LABOR BURDEN AND COST (rounded) ^j						138		\$17,400
TOTAL CAPITAL AND O&M COST ^j								\$0
GRAND TOTAL (rounded) ^j								\$17,400

Assumptions:

a There are four respondents subject to the standard, and no additional new sources will become subject to the rule over the next three years.

b This ICR uses the following labor rates: Managerial \$163.17 (\$77.70+ 110%); Technical \$130.28 (\$62.04 + 110%); and Clerical \$65.71 (\$31.29 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, "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 varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

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 included in burden item 4D.

e 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.

f 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).

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.

Table 2: Average Annual EPA Burden and Cost - NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT)

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Activity	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (AxB)	Plants per year ^a	Technical person-hours per year (CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
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 ^c	4	1	4	0	0	0	0	\$0
Periodic reports								
a. Review annual compliance status ^d	20	1	20	4	80	4	8	\$4,891
b. Review deviation reports ^e	10	1	10	0	0	0	0	\$0

Optional								
Review compliance plan	20	1	20	0	0	0	0	\$0
TOTAL ANNUAL BURDEN AND COST (rounded) ^f					92			\$4,890

Assumptions:

a 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.

b This cost is based on the average hourly labor rate as follows: Managerial \$73.46 (GS-13, Step 5, \$45.91 + 60%); Technical \$54.51 (GS-12, Step 1, \$34.07 + 60%); and Clerical \$29.50 (GS-6, Step 3, \$18.44 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

c 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.

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.