

ICR Summary Information

Hours per Response	35
Number of Respondents	4
Total Estimated Burden Hours	138
Total Estimated Costs	\$17,400
Annualized Capital O&M	N/A
Form Number	Not Applicable

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

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

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: Managerial \$163.17 (\$77.70+ 110%); Technical \$130.28 (\$62.04 + 110%) are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, “Table 2. Civilian W rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for varyii business costs of employing workers beyond their wages and benefits, including business expenses associated with
- ^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.

ations (40 CFR Part 63, Subpart TTTT)

(E)	(F)	(G)	(H)
Technical person-hours per year (Cx _D)	Management person hours per year (Fx _{0.05})	Clerical person hours per year (Fx _{0.1})	Total Cost Per year ^b
4	0.2	0.4	\$580
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
48	2.4	4.8	\$6,960
0	0	0	\$0
60			\$7,540
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
48	2.4	4.8	\$6,960
20	1.0	2.0	\$2,900
0	0	0	
78			\$9,861
138			\$17,400

2019 Labor Rates	
Managerial	\$163.17
Technical	\$130.28
Clerical	\$65.71

Reponses	Hrs/Reponse
4	34.5

			\$0
			\$17,400

over the next three years.

6); and Clerical \$65.71 (\$31.29 + 110%). These rates
'orkers, by occupational and industry group." The
ng industry wage rates and the additional overhead
. hiring, training, and equipping their employees.

is 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 TTTT) (Renewal)

Activity	(A)	(B)	(C)	(D)	(E)	(F)
	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)
Activity						
Review reports						
a. Initial notification	4	1	4	0	0	0
b. Notification of intent to construct	4	1	4	0	0	0
c. Notification of startup	4	1	4	0	0	0
d. Notification of intent to conduct a performance test	4	1	4	0	0	0
e. Notification of site-specific test plan	4	1	4	0	0	0
f. Notification of performance test results ^c	4	1	4	0	0	0
Periodic reports						
a. Review annual compliance status ^d	20	1	20	4	80	4
b. Review deviation reports ^e	10	1	10	0	0	0
Optional						
Review compliance plan	20	1	20	0	0	0
TOTAL ANNUAL BURDEN AND COST (rounded)^f						92

Assumptions:

^a There are four sources that are subject to the standard, and no additional new sources will become subject to the rule over

^b This cost is based on the average hourly labor rate as follows: Managerial \$73.46 (GS-13, Step 5, \$45.91 + 60%); Techn Step 1, \$34.07 + 60%); and Clerical \$29.50 (GS-6, Step 3, \$18.44 + 60%). This ICR assumes that Managerial hours are 5 hours, and Clerical hours are 10 percent of Technical hours. These rates are from the Office of Personnel Management (OI Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit paid 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 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
0	\$0
8	\$4,891
0	\$0
0	\$0
	\$4,890

2022 Labor Rates	
Managerial	\$73.46
Technical	\$54.51
Clerical	\$29.50

r the next three years.

ical \$54.51 (GS-12, percent of Technical ?M), 2023 General kages available to

pply to existing

NOTE FROM Section 6(b)(ii) of Previous Supporting Statement:

The only costs to the regulated industry resulting from information collection activities required by labor costs. There are no capital/startup or operation and maintenance costs because no current le subject to the Leather Finishing Operations NESHAP, comply with the NESHAP using a control devic sources are expected to start-up over the next three years.

the subject standard are
rather finishing operations,
e, and it is estimated that no

Total Annual Respo

(A)	(B)	(C)
Information Collection Activity	Number of Respondents	Number of Responses
Initial notification	0	1
Notification of intent to construct	0	1
Notification of startup	0	1
Notification of site-specific test plan	0	1
Notification of compliance status	0	1
Annual compliance status certification	4	1
Deviation report	0	1

nse	
(D)	(E)
Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(BxC)+D$
0	0
0	0
0	0
0	0
0	0
0	4
0	0
Total	4

Number of Respondents			
Year	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports
	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports
1	0	4	0
2	0	4	0
3	0	4	0
Average	0	4	0

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

(D)	(E)
Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
0	4
0	4
0	4
0	4

es.