U.S. Environmental Protection Agency
Information Collection Request

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

OMB Control Number: 2060-0327

EPA ICR Number: 1611.14

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.

The Office of Management and Budget (OMB) approved the currently active ICR without any "Terms of Clearance."

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, chromium emissions from chromium electroplating and chromium anodizing tanks 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 N.

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 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. EPA is also requiring that 40 CFR Part 63, Subpart N 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 September 19, 2012. Respondents are required to use the EPA's Electronic Reporting Tool (ERT) to develop performance test reports and performance evaluation 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 certain notifications through EPA's CEDRI. The notification is 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.

Information contained in these reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by the EPA's Office of Compliance. 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.

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 BUSINESSES AND SMALL ENTITIES

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

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.

6. CONSEQUENCES 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.

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1. 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 OMB 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 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 (89 FR 63933) on August 6, 2024. 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 1,343 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 Policy Group at jhannapel@thepolicygroup.com, and Coventya, Inc. at d.lay@coventya.com. 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.

No payments or gifts are made to respondents.

10. ASSURANCE OF CONFIDENTIALITY

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 & 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. Generally, estimates should not include burden hours for customary and usual business practices.*
- *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.*

12a. Respondents/NAICS 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 in the table below:

Standard (40 CFR Part 63, Subpart N)	SIC Codes	NAICS Codes
Electroplating, Plating, Polishing, Anodizing, and Coloring	3471	332813
Hand and Edge Tool Manufacturing	3423	332216

Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	3479	332812
Fluid Power Cylinder and Actuator Manufacturing	3593	333995

Based on our research for this ICR, on average over the next three years, approximately 1,291 existing respondents will be subject to the standard. It is estimated that 52 existing respondents keep records but do not submit reports, and no additional respondents per year will become subject, for an overall total of 1,343 respondents per year. The number of respondents is calculated using the Number of Respondents table that addresses the three years covered by this ICR. None of the facilities in the United States are owned by either state, local, or tribal entities or by 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. 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).

The total number of annual responses per year is calculated using the Total Annual Responses table shown below. The number of Total Annual Responses is 1,730.

12b. Information Requested

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). Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least five years following the date of such measurements, maintenance reports, and records.

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,	§63.9(c); §63.9(i);

Notifications	
and changes in information	§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., quarterly reports are required when an emission limit is exceeded), except for sources using trivalent chromium baths	§63.347(g)
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	§63.346(b)(12)

Recordkeeping	
who use actual cumulative rectifier capacity to determine facility size, records of total capacity expended to date.	
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)

12c. 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.
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.

12d. Respondent Burden Hours and Labor Costs

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 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). 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	$172.41 ($82.10 + 110%)
Technical	$141.75 ($67.50 + 110%)
Clerical	$71.36 ($33.98 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2023, "Table 2. Civilian workers by occupational and industry group." The rates are from column 1, "Total compensation." The rates are 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.

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.

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 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 this regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) and other costs such as photocopying and postage.

The total capital/startup costs for this ICR are $0. This is the total of column D shown below in the table Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The total operation and maintenance (O&M) costs for this ICR are $20,400,000. This is the total of column G shown below in the table Capital/Startup vs. Operation and Maintenance (O&M) Costs.

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.

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

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

- 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

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. 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.

14b. Agency Labor Cost

The 'burden' to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors. 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 burden and cost during the three years of the ICR is estimated to be 3,920 hours at a cost of $218,000. See Table 2: 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).

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

Managerial	$76.91 (GS-13, Step 5, $48.07 + 60%)
Technical	$57.07 (GS-12, Step 1, $35.67 + 60%)
Clerical	$30.88 (GS-6, Step 3, $19.30+ 60%)

These rates are from the Office of Personnel Management (OPM), 2024 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 Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR Part 63, Subpart N) (Renewal).

14c. Agency Non-Labor Costs

There are no non-labor costs to the Agency associated with this information collection.

15) REASONS FOR 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 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 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 (December 2023) 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.

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 EXPIRATION DATE

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

EPA will display the expiration date for OMB approval of the information collection.

18) CERTIFICATION STATEMENT

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

There are no exceptions to the topics of the certification statement.

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)

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences 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	$211,531.23
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	10	1	10	0	0	0	0	$0

plan								
Annual compliance status reports for area sources [f, g]	4	1	4	1,033	4,132	207	413	$650,816.86
Semiannual reports of exceedances for area sources [g]	8	2	16	258	4,128	206	413	$650,186.83
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	258	13	26	$40,636.68
Subtotal for Reporting Requirements						**11,340**		**$1,553,172**
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	79,875	3,994	7,988	$12,580,831.69
- Wetting agents (normal schedule) [j,k]	0.25	1000	250	466	116,500	5,825	11,650	$18,349,507.25
- Wetting agents (reduced frequency schedule) [j,k]	0.25	100	25	52	1,300	65	130	$204,758.45
- 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	2556	128	256	$402,586.61
- Cumulative rectifier capacity	----------See 4E----------							
- Records of trivalent chromium bath purchases [n]	0.5	12	6	52	310	16	31	$48,858.52
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					**230,622**			**$31,586,543**
TOTAL LABOR BURDEN AND COST (rounded) °					**242,000**			**$33,100,000**
TOTAL CAPITAL/O&M COST (rounded) °								**$20,400,000**
GRAND TOTAL (rounded) °								**$53,500,000**

Assumptions:

[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: Managerial $172.41 ($82.10+ 110%); Technical $141.75 ($67.50 + 110%); and Clerical $71.36 ($33.98 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2023, "Table 2. Civilian workers by occupational and industry group." The rates are from column 1, "Total compensation." The rates are 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] 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 - 52 = 1,291), 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 = 1,033) will have no excess emissions and 20 percent of the sources (0.20 x 1,291 = 258) 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) 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 based on the assumption that 84 percent of hard chromium electroplating facilities (84% of 652 = 548), 13 percent of the decorative chromium electroplating that use hexavalent chromium bath (13% of 465 = 60) and 18 percent of chromium anodizing facilities (18% of 174 = 31) 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 = 396) and 70 percent of chromium anodizing plants (70% of 174 = 122) will use wetting agents for a total of 518 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 518 = 466) will be on a normal schedule and 10 percent of the sources (10% of 518 = 52) 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) 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 = 52) use trivalent chromium baths and 90 percent use hexavalent chromium baths (90% of 517 = 465).

[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 – 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 Occurrence (Technical hours)	(B) Number of Occurrences 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	52	2.60	5.20	$3,328.18
Annual compliance status reports for area sources [f, g]	2	1	2	1033	2066	103	207	$132,231.23
Semiannual reports of exceedances for area sources [f, g]	2	2	4	258	1032	51.6	103	$66,051.61
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	258	12.9	25.8	$16,512.90
TOTAL (rounded) [i]					**3,920**			**$218,000**

Assumptions:

[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 average hourly labor rate as follows: Managerial $76.91 (GS-13, Step 5, $48.07 + 60%); Technical $57.07 (GS-12, Step 1, $35.67 + 60%); and Clerical $30.88 (GS-6, Step 3, $19.30+ 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), 2024 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] 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 - 52 = 1,291), 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 = 1,033) will have no excess emissions and 20 percent of the sources (0.20 x 1,291= 258) 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) 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.

Number of Respondents

	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents [1]	Number of Existing Respondents [2]	Number of Existing Respondents that keep records but do not submit reports [2]	Number of Existing Respondents That Are Also New Respondents	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.

[2] We assume that all sources are area sources. Area sources, except for 52 decorative chromium electroplating plants using trivalent chromium bath, are required to submit an annual compliance status report; these 52 decorative chromium electroplating facilities are only required to maintain records.

Total Annual Responses

(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Notification of applicability	1,033	1	52	1,085
Notification of construction/reconstruction	258	2	0	516
Notification of actual startup	129	1	0	129
		Total (rounded)		1,730

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

(A)	(B)	(C)	(D)	(E)	(F)	(G)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E x F)
Operating Parameter Monitoring Systems	$0	0	$0	$15,000	1,343	$20,145,000
Stalagmometer/ tensiometer calibration and cleaning	$0	0	$0	$214	1,343	$287,348
Totals (rounded)[a]			$0			$20,400,000

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