

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION**

**National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations**

**ATTACHMENT 1**

**TABLES 1, 2, 3, and 4**

Annual Respondent Burden and Cost of Recordkeeping and Reporting Re

Summary of Annual Respondent Burden and Cost of Recordkeeping and F

**ATTACHMENT 2**

**TABLES 5, 6, 7, and 8**

Annual Agency Burden and Cost of Recordkeeping and Reporting Require

Summary of Annual Agency Burden and Cost of Recordkeeping and Repo

**F**  
**AGENCY**

**(40 CFR Part 63, Subpart TTTT) (Amendments) December 2017**

Requirements for the Leather Finishing Operations NESHAP – Years 1-3 (Amendments)

Reporting Requirements for the Leather Finishing Operations NESHAP (Amendments)

Amendments for the Leather Finishing Operations NESHAP - Year 1-3 (Amendments)

Reporting Requirements for the Leather Finishing Operations NESHAP (Amendments)

<b>Respondent Wages (\$2016)</b>		
<b>Category (1)</b>	<b>Hourly Mean Wage (2)</b>	<b>Loaded Wage (3)</b>
Technical	\$37.70	\$79.17
Clerical	\$17.49	\$36.73
Managerial	\$50.81	\$106.70

Footnotes:

(1) The Wage categories "Technical," "Clerical," and "Managerial" refer to the labor category codes 11-3051, 43-6010, and 11-1021, respectively, in the United States Department of Labor, Bureau of Labor Statistics table titled "May 2016 National Industry-Specific Occupational Employment and Wage Estimates NAICS 316100 - Leather and Hide Tanning and Finishing," found here:  
[https://www.bls.gov/oes/current/naics4\\_316100.htm](https://www.bls.gov/oes/current/naics4_316100.htm)

(2) Selected "mean hourly wage" in the table referenced in footnote 1.

(3) Loaded Wage is the 2016 Wage increased by 110 percent to account for the benefit packages available to those employed by private industry.

<b>EPA Wages (\$2016)</b>		
<b>Category (1)</b>	<b>Hourly Mean Wage</b>	<b>Wage With Fringe &amp; Overhead (2)</b>
(GS- 12, step 1) - Technical	\$29.76	\$47.62
(GS- 13, step 5) - Managerial	\$40.10	\$64.16
(GS-6, step 3) - Clerical	\$16.10	\$25.76

Footnotes:

(1) The hourly mean wage for each category is found here:  
<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pd>

(2) Wage with fringe and overhead is the hourly mean wage increased by 60 percent to account for the benefit packages available to government employees.

**Table 1: Annual Respondent Burden and Cost – NESHAP for Leather Finishing Operations (40 CFR Part 63, Subpart TTTT) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost  Per year <sup>b</sup>
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions	4	1	4	0	0	0	0	\$0
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 <sup>c</sup>	1	12	12	0	0	0	0	\$0
Actual HAP loss determination <sup>c</sup>	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 site-specific test plan	2	1	2	0	0	0	0	\$0
Submit annual compliance status certification <sup>d</sup>	12	1	12	10	120	6	12	\$13,510.56
Deviation report <sup>e</sup>	5	1	5	0	0	0	0	\$0
<b>Subtotal for Reporting Requirements</b>						<b>138</b>		<b>\$13,510.56</b>
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Develop compliance plan	50	1	50	0	0	0	0	\$0
C. Time to 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 <sup>f</sup>	1	12	12	10	120	6	12	\$13,510.56
E. Time to train personnel <sup>g</sup>	5	1	5	10	50	2.5	5	\$5,629.40
G. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>196</b>		
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>						<b>334</b>		<b>\$32,651</b>

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately ten sources that are subject to the standard, and no additional new sources will become subject to the rule over the next three years.

<sup>b</sup> This ICR uses the following labor rates: \$128.02 per hour for Executive, Administrative, and Managerial labor; \$101.05 per hour for Technical labor, and \$51.37 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March, 2014, Table 2. Civilian Workers, by Occupational and Industry group. The rates are from column 1, Total Compensation. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed that the burden associated with monthly recording of actual and allowable HAP loss values are included in burden item 4D.

<sup>d</sup> We have assumed that it will take each respondent twelve hours once per year to complete the compliance status certification report.

<sup>e</sup> We have assumed that no respondent will submit a deviation report.

<sup>f</sup> We have assumed that each respondent is required to record compliance ratio determination on a monthly basis.

<sup>g</sup> We have assumed that it will take each respondent five hours once per year to train personnel.

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

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year	(F) Management person-hours per year	(G) Clerical person-hours per year	(H) Cost, \$ <sup>b</sup>
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			(C=AxB)		(E=CxD)	(Ex0.05)	(Ex0.1)	
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 site-specific test	4	1	4	0	0	0	0	\$0
Periodic reports								
a. Review annual compliance status certification <sup>c</sup>	20	1	20	10	200	10	20	\$10,468.00
b. Review deviation reports <sup>d</sup>	10	1	10	0	0	0	0	\$0
Optional								
Review compliance plan	20	1	20	0	0	0	0	\$0
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>						230		\$10,468

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately ten sources that are subject to the standard, and no additional new sources will become subject to the rule over the next three years.

<sup>b</sup> This cost is based on the following labor rates which have been increased by 60 percent to account for the benefit package available to government employees: \$62.90 Managerial rate (GS-13, Step 5, \$39.31 + 60%), \$46.67 Technical rate (GS-12, Step 1, \$29.17 + 60%), and \$25.25 Clerical rate (GS-6, Step 3, \$15.78 + 60%). These rates are from the Office of Personnel Management (OPM) 2014 General Schedule which excludes locality rates of pay.

<sup>c</sup> We have assumed that each respondent will take 20 hours to review the annual compliance status certification report.

<sup>d</sup> We have assumed that no respondent will submit a deviation report.

**Table 1 - Annual Respondent Burden and Cost of Recordkeeping and Report  
NESHAP - Year 1 (Amendm**

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 <sup>a</sup>
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting requirements				
A. Read instructions and rule revisions				
Read instructions	4	1	4	0
Read and understand rule revisions <sup>c</sup>	2	1	2	4
B. Required activities				
Leather production determination	1	12	12	0
Type of Product process determination	2	4	8	0
Allowable HAP loss determination <sup>d</sup>	1	12	12	0
Actual HAP loss determination <sup>d</sup>	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 site-specific test plan	2	1	2	0
Notification of compliance status <sup>e</sup>	12	1	12	0
Annual compliance status certification <sup>f</sup>	12	1	12	4
Deviation report <sup>g</sup>	6	1	6	0
<b>Subtotal for Reporting Requirements</b>				
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 <sup>h</sup>	1	12	12	4
E. Train personnel <sup>i</sup>	5	1	5	4
F. Audits	N/A			
G. Record Deviation Report <sup>g</sup>	1	1	1	0
<b>Subtotal for Recordkeeping Requirements</b>				
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>				

**Assumptions:**

- <sup>a</sup> There are four respondents subject to the standard, and no additional new sources will become subject.
- <sup>b</sup> This ICR uses the following labor rates: \$106.70 per hour for Executive, Administrative, and Managerial labor. The Wage categories "Technical," "Clerical," and "Managerial" refer to the labor categories in the Department of Labor, Bureau of Labor Statistics table titled "May 2016 National Industry-Specific Occupational Employment Statistics, NAICS 316100 - Leather and Hide Tanning and Finishing." found here: <https://www.bls.gov/oes/current/oes316100.html>. These rates account for the benefit packages available to those employed by private industry.
- <sup>c</sup> Burden item was added due to the 2017 proposed amendments.
- <sup>d</sup> We have assumed that the burden associated with monthly recording of actual and allowable HAP loadings is 1 hour per month.
- <sup>e</sup> Moved this initial notification to a separate line. In Table 1 of the current ICR for the Leather Finishing compliance status certification.
- <sup>f</sup> We have assumed that it will take each respondent twelve hours once per year to complete the compliance status certification.
- <sup>g</sup> We have assumed that no respondent will submit a deviation report. Due to the 2017 amendments, the burden for preparing a deviation report increased from 5 to 6, and 1 hour is added to prepare records associated with the deviation report.
- <sup>h</sup> We have assumed that each respondent is required to record compliance ratio determination on a monthly basis.
- <sup>i</sup> We have assumed that it will take each respondent five hours once per year to train personnel.

ing Requirements for the Leather Finishing Operations  
ents)

(E)	(F)	(G)	(H)	(I)	(J)
Total Number of Responses per Year (B X D)	Technical person-hours per year (Cx D)	Management person hours per year (Fx0.05)	Clerical person hours per year (Fx0.1)	Total Hours per Year (F + G + H)	Total Cost Per year <sup>b</sup>
0	0	0	0	0	\$0.00
4	8	0.4	0.8	9.2	\$705.42
0	0	0	0	0	\$0.00
0	0	0	0	0	\$0.00
0	0	0	0	0	\$0.00
0	0	0	0	0	\$0.00
0	0	0	0	0	\$0.00
0	0	0	0	0	\$0.00
0	0	0	0	0	\$0.00
0	0	0	0	0	\$0.00
0	0	0	0	0	\$0.00
4	48	2.4	4.8	55.2	\$4,232.54
0	0	0	0	0	\$0.00
<b>8</b>	<b>56</b>	<b>2.8</b>	<b>5.6</b>	<b>64.4</b>	<b>\$4,937.97</b>
0	0	0	0	0	\$0.00
0	0	0	0	0	\$0.00
0	0	0	0	0	\$0.00
0	0	0	0	0	\$0.00
48	48	2.4	4.8	55.2	\$4,232.54
4	20	1.0	2.0	23.0	\$1,763.56
0	0	0	0	0	\$0.00
<b>52</b>	<b>68</b>	<b>3.4</b>	<b>6.8</b>	<b>78.2</b>	<b>\$5,996.10</b>
<b>60</b>	<b>124</b>	<b>6.2</b>	<b>12.4</b>	<b>142.6</b>	<b>\$10,934.07</b>

ect to the rule over the next three years.

erial labor; \$79.17 per hour for Technical labor, and \$36.73 per hour for  
y codes 11-3051, 43-6010, and 11-1021, respectively, in the United States  
pational Employment and Wage Estimates  
t/naics4\_316100.htm. The rates have been increased by 110 percent to

ss values are included in burden item 4D.

g Operations NESHAP, this notification is included with the Annual

pliance status certification report.

he person hours per occurrence for writing the deviation report are

onthly basis.

**Table 2 - Annual Respondent Burden and Cost of Recordkeeping a  
NESHAP - Year 2**

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Read instructions and rule revisions			
Read instructions	4	1	4
Read and understand rule revisions <sup>c</sup>	2	1	2
B. Required activities			
Leather production determination	1	12	12
Type of Product process determination	2	4	8
Allowable HAP loss determination <sup>d</sup>	1	12	12
Actual HAP loss determination <sup>d</sup>	1	12	12
C. Create information	N/A		
D. Gather existing information	See 4E		
E. Write Report			
Initial notification	2	1	2
Notification of intent to construct	2	1	2
Notification of startup	2	1	2
Notification of site-specific test plan	2	1	2
Notification of compliance status <sup>e</sup>	12	1	12
Annual compliance status certification <sup>f</sup>	12	1	12
Deviation report <sup>g</sup>	6	1	6
<b>Subtotal for Reporting Requirements</b>			
4. Recordkeeping requirements			
A. Read instructions and rule revisions	See 3A		
B. Develop compliance plan	50	1	50
C. Time to enter information			
Finish inventory	1	12	12
HAP content of finish	1	12	12
Leather subcategory production levels	1	12	12
D. Record compliance ratio <sup>h</sup>	1	12	12
E. Train personnel <sup>i</sup>	5	1	5
F. Audits	N/A		
G. Record Deviation Report <sup>g</sup>	1	1	1
<b>Subtotal for Recordkeeping Requirements</b>			
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>			

**Assumptions:**

<sup>a</sup> There are four respondents subject to the standard, and no additional new sources wi

<sup>b</sup> This ICR uses the following labor rates: \$106.70 per hour for Executive, Administrative, and Clerical labor. The Wage categories "Technical," "Clerical," and "Managerial" refer to the States Department of Labor, Bureau of Labor Statistics table titled "May 2016 National I NAICS 316100 - Leather and Hide Tanning and Finishing." found here: <https://www.bls.gov>. to account for the benefit packages available to those employed by private industry.

<sup>c</sup> Burden item was added due to the 2017 proposed amendments.

<sup>d</sup> We have assumed that the burden associated with monthly recording of actual and al

<sup>e</sup> Moved this initial notification to a separate line. In Table 1 of the current ICR for the L compliance status certification.

<sup>f</sup> We have assumed that it will take each respondent twelve hours once per year to con

<sup>g</sup> We have assumed that no respondent will submit a deviation report. Due to the 2017 increased from 5 to 6, and 1 hour is added to prepare records associated with the devia

<sup>h</sup> We have assumed that each respondent is required to record compliance ratio deter

<sup>i</sup> We have assumed that it will take each respondent five hours once per year to train p

**and Reporting Requirements for the Leather Finishing Operations  
(Amendments)**

(D)	(E)	(F)	(G)	(H)	(I)	(J)
Respondents per year <sup>a</sup>	Total Number of Responses per Year (B X D)	Technical person- hours per year (Cx D)	Management person hours per year (Fx0.05)	Clerical person hours per year (Fx0.1)	Total Hours per Year (F + G + H)	Total Cost Per year <sup>b</sup>
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
4	4	48	2.4	4.8	55.2	4,232.54
0	0	0	0	0	0	0.00
<b>4</b>	<b>4</b>	<b>48</b>	<b>2.4</b>	<b>4.8</b>	<b>55.2</b>	<b>4,232.54</b>
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
4	48	48	2.4	4.8	55.2	4,232.54
4	4	20	1.0	2.0	23.0	1,763.56
0	0	0	0	0	0	0.00
<b>52</b>	<b>68</b>	<b>3.4</b>	<b>6.8</b>	<b>78.2</b>	<b>5,996.10</b>	
<b>56</b>	<b>116</b>	<b>5.8</b>	<b>11.6</b>	<b>133.4</b>	<b>10,228.64</b>	

will become subject to the rule over the next three years.

e, and Managerial labor; \$79.17 per hour for Technical labor, and \$36.73 per hour for  
e labor category codes 11-3051, 43-6010, and 11-1021, respectively, in the United  
Industry-Specific Occupational Employment and Wage Estimates  
gov/oes/current/naics4\_316100.htm. The rates have been increased by 110 percent

allowable HAP loss values are included in burden item 4D.

Whether Finishing Operations NESHAP, this notification is included with the Annual

Complete the compliance status certification report.

amendments, the person hours per occurrence for writing the deviation report are  
certification report.

notification on a monthly basis.

personnel.

**Table 3 - Annual Respondent Burden and Cost of Recordkeeping at NESHAP - Year 3**

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (AxB)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Read instructions and rule revisions			
Read instructions	4	1	4
Read and understand rule revisions <sup>c</sup>	2	1	2
B. Required activities			
Leather production determination	1	12	12
Type of Product process determination	2	4	8
Allowable HAP loss determination <sup>d</sup>	1	12	12
Actual HAP loss determination <sup>d</sup>	1	12	12
C. Create information	N/A		
D. Gather existing information	See 4E		
E. Write Report			
Initial notification	2	1	2
Notification of intent to construct	2	1	2
Notification of startup	2	1	2
Notification of site-specific test plan	2	1	2
Notification of compliance status <sup>e</sup>	12	1	12
Annual compliance status certification <sup>f</sup>	12	1	12
Deviation report <sup>g</sup>	6	1	6
<b>Subtotal for Reporting Requirements</b>			
4. Recordkeeping requirements			
A. Read instructions and rule revisions	See 3A		
B. Develop compliance plan	50	1	50
C. Time to enter information			
Finish inventory	1	12	12
HAP content of finish	1	12	12
Leather subcategory production levels	1	12	12
D. Record compliance ratio <sup>h</sup>	1	12	12
E. Train personnel <sup>i</sup>	5	1	5
F. Audits	N/A		
G. Record Deviation Report <sup>g</sup>	1	1	1
<b>Subtotal for Recordkeeping Requirements</b>			
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>			

**Assumptions:**

<sup>a</sup> There are four respondents subject to the standard, and no additional new sources wi

<sup>b</sup> This ICR uses the following labor rates: \$106.70 per hour for Executive, Administrative, and Clerical labor. The Wage categories "Technical," "Clerical," and "Managerial" refer to the United States Department of Labor, Bureau of Labor Statistics table titled "May 2016 National Occupational Employment, Wage, and Hour Data, NAICS 316100 - Leather and Hide Tanning and Finishing." found here: <https://www.bls.gov/publications/tables/naics316100.htm>. We have added 10 percent to account for the benefit packages available to those employed by private industry.

<sup>c</sup> Burden item was added due to the 2017 proposed amendments.

<sup>d</sup> We have assumed that the burden associated with monthly recording of actual and allowed hours is 1 hour per month.

<sup>e</sup> Moved this initial notification to a separate line. In Table 1 of the current ICR for the Leather and Hide Tanning and Finishing industry, the compliance status certification is included in the initial notification.

<sup>f</sup> We have assumed that it will take each respondent twelve hours once per year to complete the compliance status certification.

<sup>g</sup> We have assumed that no respondent will submit a deviation report. Due to the 2017 amendments, the number of deviation reports increased from 5 to 6, and 1 hour is added to prepare records associated with the deviation reports.

<sup>h</sup> We have assumed that each respondent is required to record compliance ratio determinations for each of the 12 months of the year.

<sup>i</sup> We have assumed that it will take each respondent five hours once per year to train personnel on the compliance status certification.

**and Reporting Requirements for the Leather Finishing Operations (Amendments)**

(D)	(E)	(F)	(G)	(H)	(I)	(J)
Respondents per year <sup>a</sup>	Total Number of Responses per Year (B X D)	Technical person- hours per year (CxD)	Management person hours per year (Fx0.05)	Clerical person hours per year (Fx0.1)	Total Hours per Year (F + G + H)	Total Cost Per year <sup>b</sup>
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
4	4	48	2.4	4.8	55.2	4,232.54
0	0	0	0	0	0	0.00
<b>4</b>	<b>48</b>	<b>2.4</b>	<b>4.8</b>	<b>55.2</b>	<b>4,232.54</b>	
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
0	0	0	0	0	0	0.00
4	48	48	2.4	4.8	55.2	4,232.54
4	4	20	1.0	2.0	23.0	1,763.56
0	0	0	0	0	0	0.00
<b>52</b>	<b>68</b>	<b>3.4</b>	<b>6.8</b>	<b>78.2</b>	<b>5,996.10</b>	
<b>56</b>	<b>116</b>	<b>5.8</b>	<b>11.6</b>	<b>133.4</b>	<b>10,228.64</b>	

It will become subject to the rule over the next three years.

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the labor category codes 11-3051, 43-6010, and 11-1021, respectively, in the  
ational Industry-Specific Occupational Employment and Wage Estimates  
gov/oes/current/naics4\_316100.htm. The rates have been increased by 110  
stry.

allowable HAP loss values are included in burden item 4D.

ather Finishing Operations NESHAP, this notification is included with the Annual

plete the compliance status certification report.

amendments, the person hours per occurrence for writing the deviation report are  
tion report.

mination on a monthly basis.

ersonnel.

**Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping for Leather Finishing Operations NESHA**

Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours
1	124.0	12.4	6.2	142.6
2	116.0	11.6	5.8	133.4
3	116.0	11.6	5.8	133.4
Total	356.0	35.6	17.8	409.4
Average	118.7	11.9	5.9	136.5

  

Year	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours
1	4	60.0	64.4	78.2
2	4	56.0	55.2	78.2
3	4	56.0	55.2	78.2
Total	4	172.0	174.8	234.6
Average	4.0	57.3	58.3	78.2

**BURDEN DUE TO PROPOSED REVISIONS**

Year	Number of Respondents	Total Hours	Labor	Non-Labor
1	4	9.2	\$705.42	\$0.00
2	4	0.0	\$0.00	\$0.00
3	4	0.0	\$0.00	\$0.00
Total	4	9.2	\$705.42	\$0.00
Average	4.0	3.1	\$235.14	\$0.00

**rdkeeping and Reporting Requirements for the P (Amendments)**

Labor Costs	Non-Labor (Annualized Capital/Startup and O&M) Costs	Total Costs
\$10,934	\$0.00	\$10,934
\$10,229	\$0.00	\$10,229
\$10,229	\$0.00	\$10,229
\$31,391.35	\$0.00	\$31,391.35
\$10,463.78	\$0.00	\$10,463.78
Total Hours	Hours per Response	Hours Per Respondent
142.6	2.4	35.7
133.4	2.4	33.4
133.4	2.4	33.4
409.4	N/A	102.4
136.5	2.4	34.1

Total Costs	Hours Per Respondent
\$705.42	2.3
\$0.00	0.0
\$0.00	0.0
\$705.42	2.3
\$235.14	0.8

**Table 5 - Annual Agency Burden and Cost of Recordkeeping and Reporting  
Leather Finishing Operations NESHAP - Year 1 (Amend)**

Activity	(A)	(B)	(C)	(D)	(E)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (AxB)	Plants per year <sup>a</sup>	Technical person-hours per year (CxD)
Activity					
Review reports					
a. Initial notification	4	1	4	0	0
b. Notification of intent to construct	4	1	4	0	0
c. Notification of startup	4	1	4	0	0
d. Notification of site-specific test	4	1	4	0	0
Periodic reports					
a. Review annual compliance status <sup>c</sup>	20	1	20	4	80
b. Review deviation reports <sup>d</sup>	10	1	10	0	0
Optional					
Review compliance plan	20	1	20	0	0
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>					<b>80</b>

**Assumptions:**

<sup>a</sup> There are four sources that are subject to the standard, and no additional new sources will become subject

<sup>b</sup> This cost is based on the following labor rates which have been increased by 60 percent to account for the government employees: \$64.16 Managerial rate (GS-13, Step 5, \$40.10 + 60%), \$47.62 Technical rate (GS-7, Step 1, \$29.76 + 60%), \$25.76 Clerical rate (GS-6, Step 3, \$16.10 + 60%). These rates are from the Office of Personnel Management Schedule which excludes locality rates of pay. <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/>

<sup>c</sup> We have assumed that each respondent will take 20 hours to review the annual compliance status certificate

<sup>d</sup> We have assumed that no respondent will submit a deviation report.

**ng Requirements for the  
ments)**

(F)	(G)	(H)
Managem nt person- hours per year (Ex0.05)	Clerical person- hours per year (Ex0.1)	Cost, \$ <sup>b</sup>
0	0	0.00
0	0	0.00
0	0	0.00
0	0	0.00
4	8	4,272.00
0	0	0.00
0	0	0.00
<b>4</b>	<b>8</b>	<b>4,272.00</b>

ect to the rule over the next three years.

ne benefit package available to  
S-12, Step 1, \$29.76 + 60%), and  
ment (OPM) 2016 General  
ries-wages/salary-tables/pdf/

fication report.

**Table 6 - Annual Agency Burden and Cost of Recordkeeping and Reporting  
Leather Finishing Operations NESHAP - Year 2 (Amendment)**

Activity	(A)	(B)	(C)	(D)	(E)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (AxB)	Plants per year <sup>a</sup>	Technical person-hours per year (CxD)
Activity					
Review reports					
a. Initial notification	4	1	4	0	0
b. Notification of intent to construct	4	1	4	0	0
c. Notification of startup	4	1	4	0	0
d. Notification of site-specific test	4	1	4	0	0
Periodic reports					
a. Review annual compliance status	20	1	20	4	80
b. Review deviation reports <sup>d</sup>	10	1	10	0	0
Optional					
Review compliance plan	20	1	20	0	0
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>					<b>80</b>

**Assumptions:**

<sup>a</sup> There are four sources that are subject to the standard, and no additional new sources will become subject.

<sup>b</sup> This cost is based on the following labor rates which have been increased by 60 percent to account for the government employees: \$64.16 Managerial rate (GS-13, Step 5, \$40.10 + 60%), \$47.62 Technical rate (GS-7, Step 5, \$29.76 + 60%), \$25.76 Clerical rate (GS-6, Step 3, \$16.10 + 60%). These rates are from the Office of Personnel Manager Schedule which excludes locality rates of pay. <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/>

<sup>c</sup> We have assumed that each respondent will take 20 hours to review the annual compliance status certificate.

<sup>d</sup> We have assumed that no respondent will submit a deviation report.

**ing Requirements for the  
ments)**

(F)	(G)	(H)
Managem nt person- hours per year (Ex0.05)	Clerical person- hours per year (Ex0.1)	Cost, \$ <sup>b</sup>
0	0	0.00
0	0	0.00
0	0	0.00
0	0	0.00
4	8	4,272.00
0	0	0.00
0	0	0.00
<b>4</b>	<b>8</b>	<b>4,272.00</b>

ect to the rule over the next three years.

ie benefit package available to  
S-12, Step 1, \$29.76 + 60%), and  
nent (OPM) 2016 General  
ries-wages/salary-tables/pdf/

ication report.

**Table 7 - Annual Agency Burden and Cost of Recordkeeping and Reporting  
Leather Finishing Operations NESHAP - Year 3 (Amendment)**

Activity	(A)	(B)	(C)	(D)	(E)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (AxB)	Plants per year <sup>a</sup>	Technical person-hours per year (CxD)
Activity					
Review reports					
a. Initial notification	4	1	4	0	0
b. Notification of intent to construct	4	1	4	0	0
c. Notification of startup	4	1	4	0	0
d. Notification of site-specific test	4	1	4	0	0
Periodic reports					
a. Review annual compliance status	20	1	20	4	80
b. Review deviation reports <sup>d</sup>	10	1	10	0	0
Optional					
Review compliance plan	20	1	20	0	0
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>					<b>80</b>

**Assumptions:**

<sup>a</sup> There are four sources that are subject to the standard, and no additional new sources will become subject to the standard.

<sup>b</sup> This cost is based on the following labor rates which have been increased by 60 percent to account for the cost of government employees: \$64.16 Managerial rate (GS-13, Step 5, \$40.10 + 60%), \$47.62 Technical rate (GS-11, Step 5, \$29.76 + 60%), \$25.76 Clerical rate (GS-6, Step 3, \$16.10 + 60%). These rates are from the Office of Personnel Management which excludes locality rates of pay. <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/> or <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/>

<sup>c</sup> We have assumed that each respondent will take 20 hours to review the annual compliance status certificate.

<sup>d</sup> We have assumed that no respondent will submit a deviation report.

**ing Requirements for the  
ments)**

(F)	(G)	(H)
Managem nt person- hours per year (Ex0.05)	Clerical person- hours per year (Ex0.1)	Cost, \$ <sup>b</sup>
0	0	0.00
0	0	0.00
0	0	0.00
0	0	0.00
4	8	4,272.00
0	0	0.00
0	0	0.00
<b>4</b>	<b>8</b>	<b>4,272.00</b>

ect to the rule over the next three years.

e benefit package available to  
S-12, Step 1, \$29.76 + 60%), and  
nent (OPM) 2016 General Schedule  
s/salary-tables/pdf/2016/GS\_h.pdf

ication report.

**Table 8 - Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Leather Finishing Operations NESHAP (Amendments)**

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs	Total Costs
1	80	4	8	92	\$4,272.00	\$0.00	\$4,272.00
2	80	4	8	92	\$4,272.00	\$0.00	\$4,272.00
3	80	4	8	92	\$4,272.00	\$0.00	\$4,272.00
Total	240	12	24	276	\$12,816.00	\$0.00	\$12,816.00
Average	80	4	8	92	\$4,272.00	\$0.00	\$4,272.00

**BURDEN DUE TO PROPOSED REVISIONS**

Year	Total Hours	Labor Costs
1	0	\$0
2	0	\$0
3	0	\$0