INFORMATION COLLECTION REQUEST SUPPORTING STATEMENT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
METAL FINISHING AND ELECTROPLATING INDUSTRY DATA COLLECTION

NOVEMBER 2022

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PART A OF THE SUPPORTING STATEMENT

United States Environmental Protection Agency
Metal Finishing and Electroplating Industry Questionnaire
EPA ICR No. 2723.01
OMB Control No. 2040-NEW
Office: EPA Office of Water
Contact: Phillip Flanders

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY AND LEGAL REQUIREMENTS THAT NECESSITATE THE COLLECTION

For many decades, industrial facilities have used and discharged per- and polyfluoroalkyl substances (PFAS) to the nation's waters. PFAS are a class of synthetic chemicals of concern to the United States Environmental Protection Agency (EPA) because of their widespread use, potential to accumulate in the environment, and adverse human health effects. EPA has not established national technology-based numeric standards for PFAS in wastewater discharges for any industrial point source categories and few states have developed water quality standards for PFAS. Therefore, few industrial facilities have PFAS monitoring requirements, effluent limitations, or pretreatment standards for wastewater discharges.

As announced in the Preliminary Effluent Guidelines Program Plan 15, published in September 2021, EPA plans to conduct a rulemaking to address PFAS discharges from a subset of facilities in the Metal Finishing and Electroplating point source categories. Based on information and data collected during the Multi-Industry PFAS Study, EPA determined PFAS are used by some metal finishing and electroplating facilities to control hexavalent chromium emissions, a known human carcinogen and inhalation hazard. EPA determined facilities performing certain chromium operations (hereafter referred to as "chromium finishing facilities"), including chromium plating, chromium anodizing, chromic acid etching, and chromate conversion coating operations, are the predominant sources of PFAS discharges by the Metal Finishing and Electroplating point source categories.

EPA, through this Information Collection Request (ICR) package, requests that the Office of Management and Budget (OMB) review and approve the ICR for the Metal Finishing and Electroplating Effluent Guidelines Rulemaking. Through this collection, EPA will obtain data essential to update and establish regulations for PFAS in wastewater discharges from metal finishing and electroplating facilities, including facilities regulated under the Metal Finishing and Electroplating point source categories as specified by the Effluent Limitations Guidelines and Standards (ELGs) codified in Title 40 of the Code of Federal Regulations (CFR) Parts 433 and 413, respectively. This collection effort is necessary because there are no nationwide PFAS use and discharge data, PFAS removal has been limited to a handful of case studies, and there is no currently available data set from which a full population of chromium finishing facilities can be derived.

EPA initially promulgated the Metal Finishing ELGs in 1983 and amended the regulations in 1984 and 1986. The current regulation covers wastewater discharges from facilities performing various metal finishing operations. Metal finishing is the process of changing the surface of an object, for the purpose of improving its appearance and/or durability. Metal finishing is related to electroplating, which is the production of a thin surface coating of a metal upon another by electrodeposition. EPA first promulgated the Electroplating ELGs in 1974, with amendments in 1977, 1979, 1981, and 1983. Together, the Metal Finishing and Electroplating ELGs apply to thousands of facilities which perform one or more of the following operations and discharge process wastewater directly to surface waters or indirectly to surface waters through publicly owned treatment works (POTWs):[1]

- Electroplating.
- Electroless plating.
- Anodizing.
- Coating (phosphating, chromating, and coloring).
- Chemical etching and milling.
- Printed circuit board manufacture.

Publicly available data on metal finishing and electroplating facilities, including whether they perform chromium finishing operations and potential use and discharge of PFAS, are limited. Chromium finishing facilities report under the same North American Industrial Classification System (NAICS) codes and Standard Industrial Classification (SIC) codes as nonchromium metal finishing and electroplating facilities. Therefore, NAICS and SIC codes cannot be used to distinguish chromium finishing facilities from other nonchromium metal finishing and electroplating facilities. EPA downloaded and reviewed information and data on metal finishing and electroplating facilities that potentially conduct one or more chromium finishing operations available in national EPA data sets, including the Chromium Electroplating and Anodizing National Emissions Standards for Hazardous Air Pollutants (NESHAP) codified at 40 CFR Part 63 Subpart N, 2017 National Emissions Inventory (NEI), Compliance and Emissions Data Reporting Interface (CEDRI), Environmental Compliance History Online (ECHO), and Integrated Compliance Information System (ICIS), as well as data collected from several state environmental agencies. However, none of these data sources define a complete population of chromium finishing facilities in the United States nor do they provide detailed information on specific facility operations (including use of hexavalent chromium or PFAS); generation and management of wastewater; or wastewater characteristics – factors essential to EPA's review

[1] A POTW is defined under 40 CFR 403.3(q) as "a treatment works as defined by section 212 of the Act, which is owned by a State or municipality (as defined by section 502(4) of the Act). This definition includes any devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage or industrial wastes of a liquid nature. It also includes sewers, pipes, and other conveyances only if they convey wastewater to a POTW Treatment Plant."

and development of ELGs to address PFAS discharges. Section 4 further discusses data sources reviewed by EPA.

A questionnaire and wastewater sampling program for the Metal Finishing and Electroplating point source categories is an essential portion of the rulemaking process, necessary for EPA to determine if the current regulations remain appropriate and, if warranted, develop new regulations. The data collection activities described in this ICR will provide a robust data set that characterizes PFAS use and wastewater generation, treatment, and discharge from chromium finishing facilities in the United States.

The Metal Finishing and Electroplating industry will devote time and resources to respond to this ICR. EPA estimates that the total burden to the approximately 1,815 chromium finishing facilities for responding to the questionnaire and conducting wastewater sampling will be approximately 35,838 hours, or $1.7 million, including labor and other direct costs. EPA estimates that the total burden to the Agency for the questionnaire and wastewater sampling will be approximately 10,188 hours, or $1.03 million, including labor costs and other direct costs. The collection design represents EPA's efforts to gather sufficient data to perform the analyses required to accurately review and revise the ELGs for chromium finishing operations, yet at the same time, administer an ICR that limits the burden placed on respondents.

2. HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED

2(a) What Information Will Be Collected, Reported, or Recorded?

EPA's Office of Water plans to administer the data collection, including a one-time questionnaire and wastewater sampling program, under the authority of Section 308 of the Federal Water Pollution Control Act, 33 USC., Section 1318 (Clean Water Act). EPA first plans to administer a questionnaire as a census to all facilities that currently or historically conducted chromium finishing operations in the United States, a subset of the metal finishing and electroplating industry regulated at 40 CFR Parts 433 or 413. Based on the data sources discussed in Section 4, EPA has identified and compiled mailing addresses for approximately 1,815 chromium finishing facilities in the United States. All active metal finishing and electroplating facilities that conduct or have conducted one or more of the specified chromium finishing operations will be required to complete the questionnaire regardless of size, geography, production, and whether the facility discharges wastewater directly to surface waters, indirectly to surface waters through POTWs, or does not discharge wastewater at all. Because no single existing data source includes information for all facilities engaging in one or more of the specified chromium operations, the exact number of chromium finishing facilities is unclear. EPA will continue to refine the list of facilities engaging in one or more chromium operations by identifying additional or duplicate facilities and collaborating with the National Association for Surface Finishing (NASF), state regulatory authorities, and other industry stakeholders before administering the questionnaire. For the purposes of this ICR, EPA estimates the population of chromium finishing facilities that will receive and be required to complete the questionnaire as 1,815 facilities.

The objectives of the questionnaire will be to confirm the population of facilities that engage or have engaged in chromium finishing operations, as well as gather facility-specific information and data relevant to generation and discharge of PFAS-containing wastewater by the industry, including:

- General facility identification, industrial classification, ELGs applicability, and wastewater permitting information.
- Type and size (both production and employees) of each facility.
- Details on chromium finishing operations, including the type(s) of chromium used and types of processes performed.
- Use of PFAS in metal finishing and electroplating operations, including type and quantity of PFAS used, rationale for use, and whether these operations generate PFAS-containing wastewater.
- Air emission controls, including use of PFAS-based chemical fume suppressants to control hexavalent chromium and alternative practices that do not involve PFAS.
- Wastewater generation, characteristics (including PFAS and other pollutant concentrations and flow rate), and management data.
- Financial data for individual facilities and their respective ultimate parent companies.

The questionnaire consists of approximately 84 questions. A copy of the draft questionnaire is included in Appendix A. EPA believes that all the information and data requested in the questionnaire is readily available to facilities; EPA does not anticipate facilities will need to generate new information or data to complete the questionnaire. The data items requested by the questionnaire and the purpose for requesting the information are listed in Table 2-1. Facilities that receive the questionnaire but have not ever conducted chromium finishing operations or will permanently cease all metal finishing and electroplating operations by 2023 will not be required to complete the full questionnaire. Most facilities will not be required to complete every question in the questionnaire as not all questions will be applicable to every facility (e.g., facilities that do not generate, treat, or discharge process wastewater will not need to complete most questions).

EPA plans to conduct the questionnaire via a web-based platform, Qualtrics Survey Software (Qualtrics). The questionnaire will primarily collect data for calendar year 2022, which represents the most recent year for which complete technical and economic data will be available as EPA expects the survey will be administered in 2023. The questionnaire will also collect limited data for time periods prior to 2022. These data will be used by EPA to determine if facilities that historically used PFAS are potential sources of PFAS discharges and assess temporal in industry operation and economics.

Table 2-1. Questionnaire Questions and Their Purpose

Section	Question Number(s)	Question Description	Purpose
1 – General Facility Information	1 – 4	Provide the facility name, physical address, and contact information (i.e., name, phone number, email, mailing address) for technical and financial information reported in the questionnaire. Identify the ultimate parent company and, if applicable, provide the name, title, phone number, email, and mailing address for a primary point of contact for the ultimate parent company.	Confirm and correct errors in the facility list including facility name and address. Ownership information for ultimate parent companies will be used to evaluate the financial structure of the industry. EPA will use contact information reported for the facility and ultimate parent company to conduct follow up, as necessary.
	5 – 6	Provide all six-digit NAICS code(s) and four-digit SIC code(s) applicable to the facility.	Identify small businesses per the Small Business Association (SBA) definitions, confirm the facility information in the facility list, and confirm the NAICS and SIC codes impacted by the Metal Finishing and Electroplating ELGs.
	7	Provide the 12-digit Facility Registry Service (FRS) identification number (also known as EPA Registry ID) associated with the facility.	Confirm the facility information in the facility list, identify any duplicate entries in the industry profile, and pull additional information for these facilities from existing EPA data sets (e.g., EPA ECHO).
	8	Identify whether the facility has engaged in metal finishing or electroplating operations at any time since the facility began operation. If so, requests an overview of the types of metal products finished or electroplated at the facility. *Facilities that respond "no" to this question will not be required to complete the remainder of the questionnaire.*	Identify facilities that should complete the questionnaire; facilities that have never engaged in metal finishing or electroplating processes operations are exempted from the remainder of the questionnaire because they are not subject to 40 CFR Parts 433 or 413.
	9	Specify the year the facility began conducting metal finishing or electroplating operations.	Determine the approximate age and duration of operations of facilities, if metal finishing or electroplating operations were performed during periods that legacy PFAS were used, and whether operations, wastewater flow or characterization, or production levels vary by age or duration of operation.
	10	Identify industries which are primary customers or ultimate users of metal products finished or electroplated at the facility.	Identify industries that are consumers of the finished metal or electroplated products and identify trends in PFAS use and discharge for specific product categories.

Table 2-1. Questionnaire Questions and Their Purpose

Section	Question Number(s)	Question Description	Purpose
	11	Identify whether the facility has engaged in one or more chromium finishing operations at any time since the facility began operation. *Facilities that respond "no" to this question will not be required to complete the remainder of the questionnaire.*	Identify facilities that should complete the questionnaire; facilities that have never engaged in chromium finishing operations are exempted from the remainder of the questionnaire because they are outside the population of interest (nonchromium finishing facilities are not suspected sources of PFAS discharges).
	12	Identify whether the facility permanently closed or permanently discontinued all metal finishing and electroplating operations as of January 1, 2023. *Facilities that respond "yes" to this question will not be required to complete the remainder of the questionnaire.*	Determine whether the facility should be included in the population evaluated and expected to incur compliance costs under the rulemaking. Facilities that have permanently closed or have permanent ceased all metal finishing and electroplating operations are exempted from the remainder of the questionnaire because they are not subject to 40 CFR Parts 433 or 413.
	13	Identify whether the facility will permanently close or permanently discontinue all metal finishing and electroplating operations by December 31, 2028.	Determine whether the facility should be included in the population evaluated and expected to incur compliance costs under the rulemaking. Facilities that will permanently close or cease all metal finishing and electroplating operations will likely not likely incur any compliance costs for the rulemaking because they will not be subject to 40 CFR Parts 433 or 413 by the time the final rulemaking is fully implemented.
	14	Report whether information and data for calendar year 2022 (the reporting year) is representative of typical production, wastewater generation, and wastewater management operations.	Determine if the information and data collected in response to the questionnaire reflect typical operations.

Table 2-1. Questionnaire Questions and Their Purpose

Section	Question Number(s)	Question Description	Purpose
	15	Collects information relevant to existing water discharge requirements (NPDES permits, pretreatment agreements, stormwater permits, underground injection control permits) and local ordinances such as permit/ordinance number, type of requirement, regulatory authority, expiration date, and type of wastewater covered by requirement. Requests facilities to submit relevant wastewater permit documents.	Identify duplicate information in the facility list, understand how facilities are managing wastewater, and how regulatory authorities are permitting water discharge requirements. Collects permit materials that may be used for future permit review.
	16	Identify the ELGs that apply to the operations conducted at the facility in 2022.	Identify how chromium finishing facilities are being permitted for the ELGs and understand potential overlap between metal related ELGs. Information collected may be used to identify inconsistencies or improper permitting of facilities.
2 – Facility Operations and PFAS Use	17 – 18	Identify the chromium finishing operations historically and currently performed at the facility and form of chromium used in these operations, including year operation was most recently performed. If chromium finishing operations were performed in 2022, requests the number of days performed and whether wastewater was generated from the operation.	Identify facilities that currently or previously conducted chromium finishing operations or otherwise used Cr VI. These facilities are those most likely to use and discharge PFAS and may incur compliance costs to install and operate PFAS control technologies. Identify whether wastewater was generated from such operations.
	19	Identify nonchromium metal finishing and electroplating operation(s) performed in 2022. If chromium finishing operations were performed in 2022, requests the materials used in the operation, number of days performed, and whether wastewater was generated from the operation.	Identify other nonchromium metal finishing and electroplating operations that are also performed at chromium finishing facilities and assess potential impacts from these nonchromium operations on wastewater characterization.
	20	Collects information on the use of chemical fume suppressants since the facility began operation, including product and manufacturer name, target pollutant and control level, whether the product contains PFAS, years product was used, and annual volume and frequency product was used in 2022.	Determine which facilities are using PFAS-based chemical fume suppressants and, thus, most likely to discharge PFAS in their wastewater. Annual volume and dosage may be used to assess quantity of PFAS added to system or chemical dosage rate for compliance costs and pollutant loads analyses. May also be used to identify nonfluorinated alternatives.

Table 2-1. Questionnaire Questions and Their Purpose

Section	Question Number(s)	Question Description	Purpose
	21	Collects information on the use of air emission controls other than chemical fume suppressants in 2022, including system type, target pollutant and control level, frequency operated in 2022, and whether wastewater is generated by the system	Determine current air emission controls used by chromium finishing facilities. Evaluate wastewater contributions from air emission controls and assess availability for alternatives to PFAS-based chemical fume suppressants for air emission control.
	22	Identify whether facility has intentionally used, blended, integrated, or applied PFAS for any other purpose during metal finishing operations, electroplating operations, or air emission controls not previously reported since the facility began operation. If yes, collects information on the PFAS use including product and manufacturer name, years product was used, and annual volume and frequency product was used in 2022.	Determine whether PFAS are being used for other purposes not yet specified in the questionnaire, allowing EPA to assess if there are other pathways by which PFAS may end up in wastewater discharges.
	23 – 24	Provide the total annual production volume of metal and chromium products for 2022 and total annual production volume of metal and chromium products associated with intentional use, blending, or application of PFAS for 2022.	Estimate the PFAS-related production at facilities relative to total production.
	25 – 26	Specify whether the facility is planning to modify operations in a manner that will affect intentional use of hexavalent chromium or PFAS by December 31, 2028.	Determine whether planned changes at the facility will impact PFAS discharges and evaluate industry trends in use of hexavalent chromium.
3 – Wastewater Generation	27	Report whether the facility generated wastewater from any processes associated with metal finishing operations, electroplating operations, or air emission controls in 2022. *Facilities that respond "no" to this question will not be required to complete Sections 3 – 6 of the questionnaire.*	Determine which facilities should complete subsequent questions specific to wastewater generation and treatment.
	28	Provide the following information for each wastewater generated on site or transferred to the facility during 2022: wastewater stream name, wastewater type, source, annual average flow rate, number of days generated, onsite wastewater treatment (yes/no), and final destination.	Understand the quantity, type, and current management practices of wastewater generated on site or transferred to the facility.

Table 2-1. Questionnaire Questions and Their Purpose

Section	Question Number(s)	Question Description	Purpose
	29	Report whether the facility is planning to modify operations in a manner that will affect process wastewater generated on site or transferred to the facility by December 31, 2028.	Determine whether planned changes at the facility will impact the quantity or quality of wastewater potentially discharged and evaluate industry trends in wastewater generation.
4 – Wastewater Flow Diagram	30	Provide one or more wastewater flow diagrams depicting the current treatment and management practices of each wastewater generated on site or transferred to the facility. Includes each wastewater stream, wastewater treatment unit, wastewater destination. The diagrams should also identify any solid waste residuals and air emissions generated as well as air emission controls on site.	Identify operations that generate wastewater or solid waste residuals, the relative amount of wastewater or waste, and how wastewater is handled at the facility. Inform selection of facilities for site visits or future sampling, assess whether the facility's system has pollutant removal treatment-in-place, and identify treatment system configuration and treatment unit redundancy.
5 – Wastewater Management and Treatment	31	Specify whether the facility discharged or transferred off site any wastewater generated from metal finishing operations, electroplating operations, or air emission controls at any point during 2022.	Identify facilities that discharge or transfer off site relevant wastewaters; facilities that do not discharge or transfer off site relevant wastewaters are directed to skip Questions 32 – 36 because they are not applicable.
	32	Report the annual average flow rate and frequency for releasing wastewater to each type of destination in 2022.	Determine the total quantity of wastewater discharged or transferred off site by type of destination (e.g., surface water, POTW, underground injection). Estimate pollutant loads associated with wastewater discharges from each facility.
	33 – 35	Collects information on the number of final outfalls and details on each destination, such as the flow rate and frequency of discharge at each final outfall, type of surface water or destination, and the name and physical address of any facilities that received wastewater from the facility in 2022.	Profile the industry by type of discharge location and characterize the types of surface waters and facilities which receive discharges from chromium finishing facilities.
	36	Asks if the facility operated one or more wastewater treatment units on site in 2022.	Identify facilities that treat wastewater on site; facilities that do not treat wastewater on site are directed to skip Questions 37 – 39 because they are not applicable.

Table 2-1. Questionnaire Questions and Their Purpose

Section	Question Number(s)	Question Description	Purpose
	37	Collects the following information for each onsite wastewater treatment unit used to treat any wastewater generated on site or transferred to the facility during 2022: treatment unit name and type, annual average flow rate, number of days operated, average resident time, technology vendor name, treatment media replacement frequency, date added to treatment system, and cost information.	Determine current treatment-in-place and identify and new treatment technologies and best management practices to help identify treatment trends in the industry. Select facilities for site visits or future sampling. Recent cost data for treatment unit installation will be used to validate cost data for similar treatments across the industry and from other sources (e.g., vendors).
	38	Collects information on chemicals added to wastewater treatment units in 2022, including chemical trade name, purpose for addition, average concentration and rate of addition, and addition frequency.	Identify types and amounts of chemical(s) added in treatment, which may also be found in the wastewater. Assess whether the system has treatment-in-place to remove these added chemicals and whether these chemicals should have limits.
	39	Provide the total annual average flow rate for influent to and effluent from the wastewater treatment system in 2022.	Assess the total capacity of the wastewater treatment system and inform costing of wastewater treatment system modifications.
	40 – 41	Determines if the facility recycled or reused any process wastewater in 2022. If so, collects information on the wastewater recycle/reuse process such as volume, frequency, and whether the stream was eventually discharged.	Profile the industry, determine the extent of wastewater reuse/recycling, and potential technology options or management practices to optimize waster use and minimize water discharge.
	42	Asks if facility has cleaned or replaced major equipment to mitigate presence of PFAS in wastewater discharges since January 1, 2018.	Determine if preventative maintenance and equipment replacement impact wastewater characteristics (particularly for chromium finishing facilities that no longer use PFAS).
	43	Report planned changes to management or treatment of wastewaters by December 31, 2028.	Determine whether planned changes at the facility will impact the quantity or quality of wastewater potentially discharged.
6 – Permit Requirements	44	Collects information on PFAS monitoring requirements, PFAS effluent limitations, and PFAS pretreatment standards for the facility.	Identify facilities with existing PFAS requirements and the bases for these requirements.

Table 2-1. Questionnaire Questions and Their Purpose

Section	Question Number(s)	Question Description	Purpose
and Monitoring Data	45 – 46	Collects PFAS and aggregated fluorine monitoring data for wastewater samples collected at in-plant and final outfalls sampling points since January 1, 2018.	Characterize wastewater at chromium finishing operations; assess PFAS removal effectiveness of treatment-in-place; and estimate PFAS loads associated with wastewater discharges
	47 – 48	Collects non-PFAS pollutant monitoring data for wastewater samples collected at in-plant and final outfalls sampling points since January 1, 2018.	Characterize wastewater at chromium finishing operations; assess non-PFAS pollutant removal effectiveness of treatment-in-place; and estimate non-PFAS pollutant loads associated with wastewater discharges
7 – Environmental and Other Data	49	Provide the facility's latitude and longitude coordinates for the facility's geographic location.	Confirm and correct errors in the facility location for use in geospatial analyses supporting the environmental assessment and environmental justice analyses (e.g., proximity of facilities to drinking water resources or disadvantaged communities).
	50 – 51	Collects the following information on the generation and management of solid waste, sludge, and concentrated wastestreams generated by metal finishing operations, electroplating operations, air emission controls, and wastewater treatment in 2022: waste stream name, waste source, annual average generation rate, and final destination.	Determine how facilities are handling solid waste, sludge, and concentrated wastestreams generated on site, including practices/end uses. Consider potential impacts of existing waste management practices as part of a cross-media analysis during the ELG rulemaking process
	52	Provide the applicable Resource Conservation and Recovery Act (RCRA) site identification number associated with the facility. Wastewater treatment sludge from electroplating processes is considered hazardous waste under RCRA and reported as waste code F006.	Link to existing RCRA program data sets and evaluate management of PFAS-containing solid wastes (including those which may be generated by wastewater treatment technologies considered as part of rulemaking analyses).
	53	Provide the facility's total estimated energy consumption for 2022.	Provide baseline for evaluating changes in energy use under the regulatory options.
	54	Requests facility or parent company studies assessing the human health or environmental effects of wastewater or stormwater discharges.	Evaluate how chromium finishing discharges are impacting receiving waters and assess non-surface water environmental impact(s).

Table 2-1. Questionnaire Questions and Their Purpose

Section	Question Number(s)	Question Description	Purpose
	55	Requests facility or parent company studies assessing any technologies or methods for disposal, treatment, or destruction of PFAS.	Identify current and new PFAS treatment technologies and best management practices for use in developing technology options and determining potential PFAS reductions and treatment costs.
	56 – 59	Collects information on groundwater quality monitoring and remediation, including monitoring schedule and available PFAS sampling results.	Assess non-surface water environmental impacts and the potential for human health impacts.
	60	Collects information on facility or parent company outreach to public, community, and other groups to discuss facility operations and potential environmental effects associated with PFAS use or wastewater discharge.	Assess outreach to groups that may be impacted by facility operations and potential pollutant releases, including those considered in the environmental justice analysis.
8 – Financial Information	61	Identify the corporation type that best described the facility in 2022.	Determine the facility's tax status and assess the availability of public data for EPA's economic analyses. EPA collects available data from secondary sources on multi-site, publicly reporting companies to reduce burden on recipients.
	62	Identify whether the facility was publicly or privately held in 2022.	Determine the facility's tax status and assess the availability of public data for EPA's economic analyses. EPA collects available data from secondary sources on multi-site, publicly reporting companies to reduce burden on recipients.
	63	Identify the race, ethnic, and gender classifications the best describe ownership of the facility in 2022 (e.g., woman owned business, African American owned business).	Analyze the potential impacts of regulatory options on minority-owned facilities and ability of these facilities to secure funding to comply funding with the requirements of the rule. May also be used for the environmental justice analysis.
	64 – 65	Report the number of full-time equivalent employees for the facility in 2022.	Classify facilities by their relative employment and determine if the rule will have disproportionate impact on substantial number of facilities as the disaggregated level.

Table 2-1. Questionnaire Questions and Their Purpose

Section	Question Number(s)	Question Description	Purpose
	66 – 67	Identify how the facility primarily funded its operations in 2022 and which forms of financing, if any, the facility used in 2022.	Determine what types of loans used in the metal finishing and electroplating sector. Determine how facilities finance their businesses so EPA can determine if the minority-owned facilities would be able to secure sufficient funding to continue operations, in view of the regulatory requirements.
	68 – 70	Requests information on the interest rate, mix of debt to equity, and repayment term type the facility would use to borrow money to finance capital improvements.	EPA's economic analysis will use these data to annualize the costs required to comply with regulatory requirements. Data will be used to analyze the financial needs of facilities to comply with regulatory requirements and conduct a closure analysis using information on current assets and estimated cost for financial capital improvements.
	71	Provide the annual capital improvement expenditure incurred for the chromium finishing operations for 2018 to 2022.	Analyze the financial status of the facility and ability to incur costs required to comply with potential regulatory options.
	72	Provide the total value for loans received for the chromium finishing operations for 2018 to 2022.	Analyze the financial status of the facility and ability to incur costs required to comply with potential regulatory options.
	73	Specify the minimum rate of return on capital (i.e., the discount rate) required to compensate equity owners for bearing risk. Identify whether the rate is pre-tax or post-tax and whether the rate is real or nominal.	EPA's economic analysis will use these data to annualize the costs required to comply with potential regulatory options. Data will be used to analyze the financial needs of facilities to comply with regulatory requirements and conduct a closure analysis using information on current assets and estimated cost for financial capital improvements.
	74	Report the revenues, costs, and expenses for the facility and the ultimate parent company for 2018 to 2022. Requested income statement data includes net sales from metal finishing and electroplating products; other income; total revenues; costs of goods sold; selling, general, administrative, depreciation, and amortization expenses; earnings before interest and tax; interest expense; taxes; and net income.	Use this information to predict future income and revenue. Multiple years re requested so EPA can identify unusually good or difficult years and can use forecasting techniques to predict variations in site cash flow.

Table 2-1. Questionnaire Questions and Their Purpose

Section	Question Number(s)	Question Description	Purpose
	75	Report the percentage of total revenue of the facility from sale of metal finishing and electroplating products that were manufactured on its behalf in a different location for 2018 to 2022.	Analyze the financial status of the facility and ability to incur costs required to comply with potential regulatory options.
	76	Specify the facility's relationship to the ultimate parent company (branch or subsidiary).	Because financing decisions are commonly made at company-level rather than the site-level, EPA will use this information to assess economic impacts at the company- level. If a company is owned by a ultimate parent company, it effects the ability of the company to access capital and finance capital improvements.
	77	Specify the state the ultimate parent company is organized as a legal entity.	Determine the ultimate parent company's tax status and assess the availability of public data for EPA's economic analyses. EPA collects available data from secondary sources on multi-site, publicly reporting companies to reduce burden on recipients.
	78	Specify if the facility's ultimate parent company is a small business as defined by the Small Business Administration.	It is also necessary to accurately identify the number of companies that are small businesses, which is necessary under the Small Business Regulatory Enforcement Fairness Act (SBREFA).
	79	Identify the race, ethnic, and gender classifications the best describe ownership of the ultimate parent company in 2022 (e.g., woman owned business, African American owned business).	Analyze the rules potential impacts minority-owned ultimate parent companies and ability of these ultimate parent companies to secure funding to comply funding with the requirements of the rule. May also be used for the environmental justice analysis.
	80 – 81	Report the number of full-time equivalent employees for the ultimate parent company in 2022.	Classify ultimate parent companies by their relative employment and determine if the rule will have disproportionate impact on substantial number of ultimate parent companies as the disaggregated level.

Table 2-1. Questionnaire Questions and Their Purpose

Section	Question Number(s)	Question Description	Purpose
	82	List any facilities in the United States that are operated by the ultimate parent company. For each facility, requests the facility name, description, NAICS, city, state, whether it was constructed or acquired, whether it conducts metal finishing or electroplating operations, and percent employment in metal finishing or electroplating activities.	EPA will use this information to aggregate from the facility level to the company level, which is needed to estimate impacts at the company level.
	83	Report if any facilities have any manufacturing of metal finishing or electroplating products done on behalf of the facility in a different location. Report the applicable facility names and year (2018 to 2022).	Analyze the financial status of the facility and ability to incur costs required to comply with potential regulatory options.
	84	Report the facility's ultimate multinational parent company total annual revenue for 2018 to 2022.	Because financing decisions are commonly made at the company level rather than the site-level, EPA intends to assess economic impacts at the company level also. If a company is owned by a parent company, it effects the ability of the company to access capital and finance capital improvements. It is also necessary for accurately identifying the number of companies that are small businesses, which is necessary under the Small Business Regulatory Enforcement Fairness Act (SBREFA).
9 – Comments	NA	Space for facility to provide additional comments or elaborate on any questions throughout the questionnaire.	Adjust responses as needed or consider any additional information as part of evaluating national level estimates based on facility-specific information.

Following receipt of the completed questionnaires, EPA will request approximately 20 chromium finishing facilities to collect wastewater samples. EPA will provide sampling supplies to each facility selected for the wastewater sampling program and contract laboratories to analyze samples collected. The wastewater sampling program will generate information and data critical to characterizing wastewaters generated and discharged by chromium finishing facilities and assess capability of existing wastewater treatment units to reduce or eliminate PFAS. EPA will use information and data collected via the questionnaire to identify chromium finishing facilities with characteristics of interest (e.g., treatment technologies that may represent Best Available Technology Economically Achievable [BAT]) and select participants in the wastewater sampling program. In selecting facilities to participate in the wastewater sampling program, EPA will target a mix of facility types, sizes, and current practices/technologies such that the data generated reflect wastewater from all types of chromium finishing operations. The wastewater sampling data collected will be used to characterize treatment system capabilities, estimate pollutant loads and removals, and potentially establish new effluent limitations for the industry.

2(b) From Whom Will the Information Be Collected?

The questionnaire will collect information from an estimated 1,815 chromium finishing facilities located in the United States. The subsequent wastewater sampling program will require a subset of approximately 20 chromium finishing facilities that completed the questionnaire to also collect wastewater samples and submit them to an EPA-contracted laboratory. The respondents affected by this ICR are primarily classified under the following NAICS codes:

- 332812 – Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers.
- 332813 – Electroplating, Plating, Polishing, Anodizing, and Coloring.

As previously stated, chromium finishing facilities are a subset of the Metal Finishing and Electroplating point source categories and often report under the same NAICS codes as nonchromium metal finishing and electroplating operations. Therefore, not all facilities reporting the above NAICS codes will receive the questionnaire.

2(c) What Will the Information Be Used For?

EPA will use the questionnaire data to refine the national profile of chromium finishing facilities from which additional data collection, including site visits or wastewater sampling, may be based. EPA will also use the questionnaire data to evaluate the current technology-based ELGs and determine if revised requirements are warranted to address PFAS and other pollutants (as the EPA Administrator deems appropriate) in wastewater discharges. EPA will collect and analyze information pertaining to wastewater characteristics (e.g., pollutants discharged, wastewater flows), pollution control practices and technologies (e.g., pollution prevention techniques, wastewater treatment units), and the economic impacts of installing and operating pollution control technologies. Specifically, EPA will use responses to characterize the type and quantity of PFAS discharged from chromium finishing facilities and to determine if PFAS

discharges can be controlled using demonstrated, economically achievable pollution control practices and technologies.

Based on current information and data available for chromium finishing facilities, EPA believes less than 5 percent are direct dischargers to surface waters and the remaining are either indirect dischargers (discharge to a POTW or third-party treatment facility) or do not discharge process wastewaters. Direct dischargers report monitoring data as part of their wastewater permit requirements and the data are publicly available through EPA systems, such as Integrated Compliance Information System – National Pollutant Discharge Elimination System (ICIS-NPDES). Data from indirect dischargers are not publicly available in a national, centralized system but instead are maintained at the state or pretreatment authority. Further, most chromium finishing facilities are not required to sample or report for PFAS in their wastewater regardless of whether they are direct or indirect dischargers. EPA will use data collected through the questionnaire and wastewater sampling program to characterize operations, wastewater generation, wastewater characteristics, wastewater management, and wastewater discharges across all chromium finishing facilities in the United States regardless of size, geography, production, type of discharge, and current management practices.

2(d) How Will the Information Be Collected? Does the Respondent have Multiple Options for Providing the Information? What Are They?

Each chromium finishing facility will receive a questionnaire notification letter which provides instructions, a URL to an EPA webpage, and a facility-specific access code. Facilities will access the URL, be directed via a button link on the EPA webpage to the login webpage, and log in using the access code in the notification letter. The web-based survey will allow for electronic review and completion of the questionnaire. The questionnaire notification letter will also include instructions for respondents unable to access the online version. This letter will be sent via the United States Postal Service or other delivery service to each facility to ensure that a facility point of contact receives and signs for it. Each facility selected for the questionnaire will be allowed 60 calendar days from the time of receipt to submit the completed questionnaire.

EPA will include a helpline email address and phone number in the instructions that respondents can use to request assistance in completing the questionnaire. Using these assistance methods enables respondents to receive a timely response to any inquiries they may have. Email and phone communication will also reduce any misinterpretations of the questionnaire and the burden of follow-up phone calls and letters to respondents.

The questionnaire will include information relevant to the purpose and authority under which EPA is conducting the survey; instructions for accessing, completing, and submitting the questionnaire; information on confidential business information (CBI) claims; and a glossary with all pertinent definitions, references, and acronyms to understand and complete the questionnaire. On the EPA website, downloadable PDF copies of the questionnaire will be available for respondents to print out and use as a working copy, helping them gather and organize response data before beginning data entry.

Facilities that are unable to access the online version will be directed to contact EPA. Upon contacting EPA, staff will mail a package via the United States Postal Service or other trackable delivery service, containing a hardcopy questionnaire. Respondents may also request a PDF version of the questionnaire be delivered via email that they can print on site. Hardcopy questionnaires can be filled out by hand and returned to EPA by mail. EPA and its contractors will enter the hardcopy questionnaire responses into Qualtrics so all responses can be reviewed and analyzed in a consistent format.

Once the questionnaire response period is complete, EPA and its contractors will export all responses from Qualtrics and review the questionnaire responses for completeness and CBI claims. Responses will also be reviewed for consistency and reasonableness and follow-up calls will be conducted as needed to clarify inconsistencies found in the responses. Questionnaire responses will be imported into a Microsoft Access-based questionnaire database which will be used by EPA to perform data analysis for the purpose of reviewing and revising the Metal Finishing and Electroplating ELGs.

In addition to technical and financial data provided by facilities in the questionnaire, EPA may need to collect and analyze wastewater samples from a subset of respondents to characterize types and quantities of PFAS in chromium finishing wastewater and evaluate performance of available pollution control practices and technologies. In this case, each chromium finishing facility selected to conduct sampling and analysis of analytical data will be contacted by EPA directly with instructions on how to participate in wastewater sampling activities. EPA will coordinate with each facility to develop detailed facility-specific sampling plans and determine when sampling should occur.

EPA has conducted, is conducting, or will conduct the following activities to administer the questionnaire:

- Develop the technical and financial questions for the questionnaire.
- Estimate the population of facilities conducting one or more chromium finishing operations in the United States by evaluating data sources listed in Section 4.
- Conduct stakeholder meetings with trade associations, industry representatives, public interest groups, state regulating agencies, EPA workgroup, OMB, and other stakeholders to refine questionnaire content (e.g., technical and financial questions, instructions, terminology and glossary) and the population of chromium finishing facilities.
- Develop the ICR Supporting Statement.
- Revise the questionnaire based on comments from trade associations, industry representatives, public interest groups, state regulating agencies, EPA workgroup members, OMB, and other stakeholders.
- Finalize the facility list by making any updates based on comments from trade associations, industry representatives, and public interest groups.
- Develop mailing labels.

- Develop the web-based questionnaire platform in Qualtrics.
- Develop and distribute the cover letters and instructions to notify facilities of the ICR.
- Develop a tracking system for the questionnaire cover letter mail-out and offline questionnaire return activities.
- Test the final questionnaire in Qualtrics prior to launch.
- Develop a questionnaire database to house and analyze responses.
- Prepare and distribute questionnaire packages to all recipients.
- Develop and maintain helplines (phone and email) for respondents who require assistance in completing their questionnaire.
- Receive and review responses, including data entry and review of hardcopy responses into Qualtrics.
- Follow up with facilities on responses as needed.
- Summarize and analyze responses.
- Conduct technical analyses, summarize results, and select facilities to participate in the wastewater sampling program.

2(e) How Frequently Will the Information Be Collected?

The information covered by this ICR is a one-time information collection.

2(f) Will the Information Be Shared with Any Other Organizations Inside or Outside EPA or the Government?

EPA may share all information not claimed as CBI and collected through this ICR within EPA and with other Government agencies, the industry, trade associations, and the public, as necessary. Further, EPA may share information claimed as CBI in accordance with its regulations under 40 CFR Part 2, Subpart B.

2(g) If This Is an Ongoing Collection, How Have the Collection Requirements Changed Over Time?

This ICR request is not an ongoing data collection.

3. TO WHAT EXTENT DOES THE COLLECTION OF INFORMATION INVOLVE THE USE OF AUTOMATED, ELECTRONIC, MECHANICAL, OR OTHER TECHNOLOGY COLLECTION TECHNIQUES OR OTHER FORMS OF INFORMATION TECHNOLOGY

EPA plans to develop the questionnaire in Qualtrics, which allows respondents to fill out and submit the questionnaire online. The Qualtrics questionnaire will be developed to meet the 1998 Government Paperwork Elimination Act (GPEA). EPA anticipates that most respondents will be familiar and comfortable with online submission forms and has received verbal feedback

from industry representatives indicating this. Additionally, the Qualtrics questionnaire will include automatic validation checks to minimize data entry errors and allow for automatic export of a response data set, reducing the potential for errors introduced by key-entry of data. EPA's email and phone helpline will also be available during the response period to assist facilities as needed with submitting responses.

EPA designed the questionnaire to include burden-reducing features. For example, the questionnaire also contains "screening" questions that direct respondents that do not qualify as the population of interest for a particular subset of questions to indicate their status and then bypass this subset of questions to continue their response. The questionnaire is also designed with drop down menus to simplify and standardize responses, minimizing the number of narrative text responses.

EPA will provide a mechanism for facilities to respond with a hardcopy mailed response if the facility cannot access the internet. EPA anticipates this situation to affect less than 2 percent of the total population that receives the questionnaire.

4. EFFORTS TO IDENTIFY DUPLICATION AND WHY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSES DESCRIBED IN ITEM 2

EPA identified several existing data sources that may contain data useful for identifying the population of chromium finishing facilities, as well as information useful for evaluating facility and/or wastewater characteristics. Table 4-1 lists sources of existing data that EPA has collected and reviewed for the study.

Table 4-1. Existing Data Sources

Data Source Name	Date of Data Collection	Population Included	Data Available	Considerations
Data Sources Used to Identify Chromium Finishing Facilities				
2012 NESHAP Part 63, Subpart N Supporting Profile Memo (EPA-HQ-OAR-2010-0600-0672)	2010 – 2012	NESHAP Part 63, Subpart N regulates hexavalent chromium emissions and applies to facilities in the United States which perform hard chromium electroplating, decorative chromium electroplating, or chromium anodizing (40 CFR Part 63, Subpart N). 1,343 records.	• Facility Name • Address • Chromium Process Type • Number of Employees • Air Emission Controls	Profile data compiled in more than 10 years ago and may not represent current industry. Does not capture chromate conversion coating or chromic acid etching facilities. Does not include information on PFAS use, wastewater generation or management, or PFAS discharge.
2017 NEI	2017	Facilities reporting to the NEI with chromium emissions greater than 0 pounds-per-year and NAICS codes 332812 or 332813. 434 records.	• Facility Name • Address • Latitude/Longitude • NAICS Code • Emissions Inventory System (EIS) ID • Toxics Release Inventory (TRI) ID • Pollutant Emissions (pounds-per-year)	NEI data includes facility location and air emissions data but does not identify the specific chromium processes occurring at the facility. Does not include information on PFAS use, wastewater generation or management, or PFAS discharge. EPA assumed that facilities with nonzero chromium emissions and NAICS codes 332812 or 332813 were likely chromium finishing facilities.
ICIS-Air Database (facilities reporting data for NESHAP Part 63, Subpart N)	Downloaded December 2021	Facilities that are regulated under NESHAP Part 63, Subpart N from EPA's ICIS Air database. 927 records.	• Facility Name • FRS ID • Small Business Flag • Air Source Description • Chromium Process Type • Metal Type • Maximum Available Control Technology (MACT) Code • ICIS-Air ID • Environmental Justice Metrics	The NESHAP regulation does not apply to facilities that conduct chromate conversion coating or chromic acid etching processes and these facilities would not be included in the NESHAP Part 63, Subpart N facility list. Does not include information on PFAS use, wastewater generation or management, or PFAS discharge.

Table 4-1. Existing Data Sources

Data Source Name	Date of Data Collection	Population Included	Data Available	Considerations
State Agencies	Varies	Facilities identified as chromium finishing facilities based on information and outreach to state environmental agencies: Alabama: 16 records. California: 196 records. Georgia: 3 records. Michigan: 88 records. Minnesota: 22 records. New Hampshire: 4 records. Wisconsin: 7 records.	• Facility Name • Address • SIC Codes • Chromium Process Type • Chromium Species Processed • PFAS Chemical Fume Suppressant Used • Pretreatment Agreement ID • NPDES Permit ID • Discharge Type • Average Flow • Design Flow • POTW Information • Facility Operating Status	Not all state data includes the same facility-level details. EPA identified likely chromium finishers using company names and websites where state lists did not differentiate chromium finishing facilities from other metal finishing processes. Does not include information on PFAS use, wastewater generation or management, or PFAS discharge.
Data Sources Used to Supplemental Information for Chromium Finishing Facilities Identified Using Data Sources Described Above				
EPA's Compliance and Emissions Data Reporting Interface (CEDRI)	Downloaded December 2021	New facilities subject to NESHAP Part 63, Subpart N regulations that must submit initial performance test reports. 72 records.	• Facility Name • Address • Chromium Species Reported • NAICS Code	EPA's WebFIRE search tool does not contain all information submitted to CEDRI, such as periodic compliance reports. Does not include information on PFAS use, wastewater generation or management, or PFAS discharge. Not all facilities subject to this NESHAP submit initial performance test reports.

Table 4-1. Existing Data Sources

Data Source Name	Date of Data Collection	Population Included	Data Available	Considerations
EPA's Environmental Compliance History Online (ECHO)	Downloaded February 2022	Facilities subject to EPA Clean Air Act regulations and report under NAICS codes 332812 or 332813. 1,647 records.	• Facility Name • Address • Latitude/Longitude • FRS ID • NAICS Code • SIC Code • AIR ID • NPDES Permit ID • MACT Code • RCRA Handler ID • TRI ID • Receiving Water Information • EIS ID	ECHO generally contains less information on indirect discharge or zero discharge facilities than direct discharge facilities. NAICS codes 332813 and 332812 are not exclusive to chromium finishing facilities. Does not include information on PFAS use, wastewater generation or management, or PFAS discharge.
ICIS-NPDES	Downloaded December 2021	Chromium finishing facilities with NPDES permit IDs identified through ECHO, ICIS-AIR, or state data. 190 records.	• Facility Name • NPDES Permit ID • Permit Issue/Expiration Dates • Discharge Type • Average or Design Flow Rate • Receiving Water Information	ICIS-NPDES data is only available for NPDES permitted facilities. Does not include information on PFAS use or discharge.
RCRAInfo	Downloaded December 2021	Facilities regulated under the Resource Conservation and Recovery Act (RCRA) waste code F006, report under NAICS codes 332812 or 332813, and have a RCRA Handler ID provided in ECHO, ICIS-AIR, or state data. 231 records.	• RCRA Handler ID • RCRA 2019 Biennial Report • Contact Name • Generator Status (e.g., Large Quantity Generator, Small Quantity Generator)	Facilities reporting under the F006 waste code may or may not conduct chromium finishing operations. NAICS codes 332813 and 332812 are not exclusive to chromium finishing facilities. Does not include information on PFAS use, wastewater generation or management, or PFAS discharge.

As demonstrated in Table 4-1, none of the existing data sources provide a complete listing of all chromium finishing facilities in the United States nor do they include information on PFAS use, wastewater generation or management, and PFAS discharge. EPA extracted and aggregated information from these data sources to develop a best available listing of chromium finishing facilities. However, facility names and addresses are often inconsistent and may change over time as ownership changes or addresses of record change. Based on the data evaluated to date, EPA estimates the population of chromium finishing facilities is approximately 1,815 facilities. While EPA has attempted to identify duplicate records based on similar facility name, city/state address, and other unique identifiers, some duplicate records may still exist. Additionally, the varying ages of the data sets may not capture facility closures, moves, or consolidations. EPA is aware of a general decreasing trend in the size of the Metal Finishing and Electroplating industry since 2012, supported most recently by a 2022 NASF Surface Finishing Economic Impact Report. EPA continues to coordinate with industry trade associations on identifying additional duplicate records and facilities included on the facility list that may not perform chromium finishing or may no longer be operating.

Although the consulted sources have provided valuable industry information, and EPA has and will continue to use this information to understand current industry practices, these sources do not provide the Agency with complete and up-to-date site-specific technical and economic data that covers the entire chromium finishing industry and are crucial to the review of the Metal Finishing and Electroplating ELGs.

5. COLLECTION OF INFORMATION IMPACTS TO SMALL BUSINESSES OR OTHER SMALL ENTITIES AND METHODS TO MINIMIZE THE BURDEN

In accordance with requirements of the Regulatory Flexibility Act (RFA), EPA must assess whether actions would have “a significant impact on a substantial number of small entities” (SISNOSE). Small entities include small businesses, small organizations, and small governmental jurisdictions.

EPA has taken steps to ensure that the respondent burden is minimized for small entities, while collecting sufficient data to evaluate regulatory flexibility for small entities. EPA will identify the size of the business entity according to Small Business Administration definitions from questionnaire information through sales revenues and company employment. For entities reporting under NAICS codes 332812 and 332813, the Small Business Administration defines small entities as those with fewer than 500 employees. Based on available information, EPA believes most chromium finishing facilities and parent companies would meet this Small Business Administration definition. The financial and economic information collected in the questionnaire is necessary to perform the economic analysis of any proposed revision to the Metal Finishing and Electroplating ELGs in order to meet the requirements of the Small Business Regulatory Enforcement Fairness Act (SBREFA).

To minimize the burden of responding to the questionnaire, EPA has written a series of questions that will preclude facilities from completing the entire questionnaire if they are identified as not conducting chromium finishing operations. Additionally, the questions are

phrased with commonly used terminology and the tables are organized in formats familiar to financial officers in the respondent industry.

6. CONSEQUENCE TO FEDERAL PROGRAM OR POLICY ACTIVITIES IF THE COLLECTION IS NOT CONDUCTED OR IS CONDUCTED LESS FREQUENTLY AND ANY TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN

The questionnaire and wastewater sampling program are to be administered one time only. If the data collection is not conducted, EPA will not be able to fulfill its statutory requirement to consider revising the Metal Finishing and Electroplating ELGs. The currently available data do not include wastewater quantity and quality characteristics information, particularly for PFAS. Information on pollution control practices and technologies is available in some permits and/or permit applications, but this information requires manual review of permit and permit application documents, permit applications may not be publicly available, and information would not be available for all chromium finishing facilities. In addition, if the national population of all chromium finishing facilities is not identified, it will not be possible to confirm whether population estimates are accurate. Without the data sought in the questionnaire, EPA will be required to rely on the publicly available data listed in Section 4. In general, these data sets are incomplete, inconsistent, and difficult to combine. The publicly available data are not sufficient to assess the current industry population, evaluate subcategories in the current ELG or future ELGs, assess use and discharge of PFAS, determine characteristics of wastewater and wastewater treatment currently occurring at chromium finishing facilities, or evaluate new pollution control practices and technologies that are being used, especially for indirect discharging facilities which comprise the majority of the sector. Also, data collected by any trade association's voluntary efforts will likely be incomplete as trade associations do not represent all chromium finishing facilities.

The questionnaire will collect data from all chromium finishing facilities on production processes, PFAS use and discharge, air emission controls, wastewater and solid waste generated, pollution prevention, wastewater management and treatment, and economics (see Section 2(a) for more specific detail). Production data from all facilities will help EPA assess extent of PFAS use by chromium finishing facilities and relationships to production type and size, type of wastewater discharge, and other aspects of facility operation including shifts in processing and seasonality. Data on wastewater generation and management will allow EPA to establish an accurate characterization of type and quantity of PFAS in wastewater and develop a current profile of the chromium finishing industry to estimate the pollutant mass loads discharged. Pollution prevention and wastewater treatment details will provide insight into the type and design of current treatment technologies employed and treatment system capabilities to reduce or eliminate PFAS discharge. Economics data will be evaluated to determine the economic health of the industry and ability to afford available pollution control technologies and practices. Overall, information on PFAS use and discharge, wastewater generation and management, and financial data are limited and only available publicly for a small subset of the industry.

If this questionnaire is not conducted, EPA would need to estimate or interpolate PFAS use, control, and discharge data for those the vast majority facilities where data is not available. EPA will also not be able to evaluate current operations or wastewater treatment capabilities, identify the extent to which PFAS and other pollutant discharges could be reduced or eliminated within the industry, or evaluate the potential economic impact that new or revised ELGs would impose on chromium finishing facilities. Without these analyses, developing new or revising existing ELGs would not be possible.

Wastewater sampling data collected through this ICR are critical for characterizing the wastewater generated by chromium finishing facilities and the wastewater discharged by chromium finishing facilities, as well as evaluating the effectiveness of pollution control practices and technologies to reduce or eliminate PFAS in discharges. These characterization data will be used to estimate current pollutant mass loads and achievable load reductions for available technologies for the industry and to potentially establish new ELG requirements. The only current publicly available PFAS concentration data are from a handful of state studies on a small subset of the chromium finishing industry. For PFAS in particular, few chromium finishing facilities are required to sample for and report PFAS in wastewater discharges. PFAS characterization data that is publicly available may use inconsistent analytical data methods and may not provide a robust or representative wastewater characterization and loads analysis. Data on the wastewater generated or discharged from indirect facilities are typically not publicly available through national data sets. EPA will not be able to calculate PFAS removal efficiencies for pollution control practices and wastewater treatment technologies without wastewater sampling.

7. SPECIAL CIRCUMSTANCES

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

8. PUBLICATION OF THE *FEDERAL REGISTER* NOTICE AND PUBLIC RESPONSE

8(a) *Federal Register* Notice Publication

EPA plans to publish a notice in the *Federal Register* announcing the Agency's intent to submit a request for a new ICR and to collect comments on the draft initial questionnaire and the draft list of chromium finishing facilities in the United States. The notice will include a description of the entities to be affected by the proposed questionnaire, a brief explanation of the need for the questionnaire, identification of the authority under which the questionnaire will be issued, and an estimate of burden to be incurred by questionnaire respondents. By means of this notice, the Agency will request comments and suggestions regarding the questionnaire and draft facility list and the reduction of data collection burden. The notice will ask that the public submit all comments and suggestions within 60 days of the *Federal Register* notice publication.

Pursuant to section 3506(c)(2)(A) of the Paperwork Reduction Act (PRA), EPA will specifically solicit comments and information to enable it to:

- Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility.
- Evaluate the accuracy of the Agency's estimate of burden of the proposed collection of information, including the validity of the methodology and assumptions used.
- Enhance the quality, unity, and clarity of the information to be collected.
- Minimize the burden of the collection of information on those who are to respond.

The public comment period will be announced at the time of the publication of this request in the *Federal Register*.

8(b) Consultations

The Engineering and Analysis Division (EAD) of EPA's Office of Water has consulted with individuals in EPA Offices, Regions, and States. EAD has also engaged with local permitting authorities and industry trade associations and stakeholders.

Consultations with the seven state environmental agencies, listed in Table 8-1, provided information on the number, location, operations, and wastewater characteristics of metal finishing and electroplating facilities in these states. Additionally, state agencies provided important perspectives on PFAS use and trends in chromium finishing facilities. However, EPA was not able to conduct outreach to every state agency, nor did every state have the same types of data or level of detail available for chromium finishing facilities.

Table 8-1. State Agency Consultations

State Environmental Agency
Alabama Department of Environmental Management
California Water Boards
Georgia Department of Natural Resources
Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Minnesota Pollution Control Agency
New Hampshire Department of Environmental Services
Wisconsin Department of Natural Resources

EPA is conducting ongoing discussions and collaboration with Michigan EGLE and EPA Region 5 to understand and characterize PFAS use within the chromium finishing industry. Michigan EGLE has conducted screening-level studies of PFAS presence in chemical fume suppressants used by chromium finishing facilities and PFAS presence in industrial wastewater discharges. Michigan ELGE identified chromium plating and chromate conversion coating as a substantial PFAS source to POTWs in their 2020 Industrial Pretreatment Program Report and confirmed PFAS presence in chromium plating wastewater in their 2020 Chrome Plater Fume Suppressant Study. EPA has coordinated with Michigan EGLE to obtain detailed facility information for chromium finishing facilities in Michigan, including the chromium finishing processes, type of

chromium used, and if the facility uses or has historically used PFAS-based chemical fume suppressants.

EPA first met with the NASF in February 2020. NASF has provided insight on the scope of the chromium finishing industry, the use of PFAS-based chemical fume suppressants, and general industry trends in production, including hexavalent chromium use and control methods. Since then, NASF has reviewed the directory of facilities and provided comments on the operating status applicability of facilities in the recipient list. NASF has reported similar challenges in identifying chromium finishing facilities separate from other types of metal finishing facilities.

EPA distributed draft copies of the ICR facility mailing list and the questionnaire to NASF for review and comment on August 2, 2022 and September 29, 2022, respectively. EPA then met with NASF on October 26, 2022 to discuss the timeline for the ICR, the mechanism of questionnaire delivery, and the types of information solicited in the questionnaire.

9. PAYMENT OR GIFT TO RESPONDENTS

No payments or gifts are provided to respondents.

10. CONFIDENTIAL BUSINESS INFORMATION CLAIMS

In accordance with 40 CFR, Part 2, Subpart B, the questionnaire informs respondents of their right to claim information as CBI. The questionnaire provides instructions for asserting CBI claims and informs respondents of the terms and rules governing the protection of CBI under the Clean Water Act and 40 CFR §2.203(b). For each question which requests information that may potentially be claimed as CBI, responses will have a corresponding CBI checkbox. Respondents will be requested to check all CBI boxes which correspond to responses they claim as CBI.

If no business confidentiality claim accompanies the information when it is received by EPA, EPA may make the information available to the public without further notice. 40 CFR §2.203.

EPA and its contractors will follow EAD's existing procedures to protect information claimed as CBI. These procedures include the following:

- Ensure secure handling of submitted and exported questionnaire data to preclude access by unauthorized personnel.
- Store exported questionnaire data and databases in secured areas of offices and system networks and restrict access to authorized EPA and contractor personnel only.
- Restrict any publication or dissemination of confidential results or findings to aggregate statistics and coded listings. Individual respondents will not be identified in summary reports.

EPA has ensured that Qualtrics meets EPA's regulations and policies for handling information claimed as CBI. EPA will design the Qualtrics questionnaire to require authentication and verification of the respondents to allow access to the questionnaire, allow users to mark information claimed as CBI, provide secure storage and limit access to EPA and EAD's contractors, and require users to certify the completed questionnaire.

Each EPA contractor that collects, processes, or stores information claimed as CBI is responsible for the proper handling of that information. Each contractor shall safeguard such information as described in 40 CFR §2.211(d) and is obligated to use or disclose information only as permitted by the contract under which the information is furnished.

11. QUESTIONS OF A SENSITIVE NATURE

No sensitive questions pertaining to private or personal information, such as sexual behavior or religious beliefs, will be asked in the questionnaire or as part of the wastewater sampling program.

12. ESTIMATES OF RESPONDENT BURDEN FOR THE INFORMATION COLLECTION

12(a) Estimate of Respondent Hour Burden

The Metal Finishing and Electroplating industry data collection effort will require recipient facilities to devote time and resources to produce acceptable responses to a questionnaire and, for a subset of facilities, also collect samples to characterize the types and quantity of pollutants in chromium finishing wastewater. EPA expects that wastewater treatment plant operators, engineers, operations managers, finance specialists, and technical staff at the facilities will devote time toward gathering requested information and data, preparing and submitting the final responses to the questionnaire, coordinating and planning sampling with EPA staff, and collecting wastewater samples. The costs to the respondents' facilities associated with these time commitments can be estimated by multiplying the time spent in each labor category by an appropriately loaded hourly labor rate.

To develop the burden estimates, EPA estimated the number of hours required to complete all parts of the questionnaire, including reviewing instructions, gathering data, entering the information requested, reviewing responses, and submitting the questionnaire. Table 12-1 breaks down the burden (in hours) per anticipated respondent activity and per labor category presumed necessary to complete the questionnaire. EPA expects that water and wastewater treatment plant operators (operators), engineers, operations managers, and finance specialists will all be involved in responding to the questionnaire. EPA has differentiated the hours that will be spent by three different types of responses for the questionnaire: 1) recipients that complete the full questionnaire, 2) recipients that will only complete Section 1 (General Facility Information), and 3) recipients that do not submit response to the questionnaire. EPA expects that approximately 15 percent of the respondent population does not perform one or more chromium finishing operations of interest or will cease all metal finishing and electroplating operations by the time the questionnaire is administered, and therefore does not fall within the

population of interest for the current rulemaking effort. These facilities will not be required to complete the full questionnaire and will be directed to the end of the questionnaire via specific screening questions in the first questionnaire section to determine applicability. As a result, these facilities will not be required to complete large portions of the questionnaire, resulting in less burden. Throughout the remainder of this supporting statement these will be referred to as "not applicable" questionnaire facilities. Although this ICR will be mandatory, the typical no response rate for effluent guidelines questionnaires is 10 percent.

EPA expects that questionnaire response will be led by the operator as most questions are specific to wastewater generation and treatment. EPA has included hours for engineering staff to support collecting data and entering details related to production as well as finance specialists to support details related to financial information requested in the questionnaire. EPA has also included hours for the operations manager to review the questionnaire response and coordinate submission.

Table 12-1. Estimated Questionnaire Response Burden by Activity, Labor Category, and Type of Response

Activity	Labor Category and Burden (hours)				
	Operator	Engineer	Operations Manager	Finance Specialist	Total Burden per Activity
Not Applicable (nonchromium finishing facilities that complete Section 1 only)					
Review Instructions & Access Qualtrics Questionnaire	0.50	0.50	0.50	0.50	2.00
Complete Questionnaire Section 1	1.00	--	--	--	1.00
Review & Submission	--	--	1.00	--	1.00
Total	**1.50**	**0.50**	**1.50**	**0.50**	**4.00**
Full Response (chromium finishing facilities completing Sections 1 through 8)					
Review Instructions & Access Qualtrics Questionnaire	0.50	0.50	0.50	0.50	2.00
Complete Questionnaire Section 1	1.00	--	--	--	1.00
Complete Questionnaire Sections 2 – 8	10.00	3.00	--	3.00	16.00
Review & Submission	--	--	6.00	--	6.00
Contact Helpline	1.00	--	--	--	1.00
Total	**12.50**	**3.50**	**6.50**	**3.50**	**26.00**

Note: EPA assumes that questionnaire recipients that do not respond to the questionnaire will incur zero burden.

In addition to completing the questionnaire, EPA will require a subset of chromium finishing facilities (approximately 20) to collect wastewater samples and submit them to an EPA-contracted laboratory. These facilities will collect one-time (one-day) grab samples inform EPA analyses of the types and quantities of pollutants in chromium finishing wastewater. Each facility selected for sampling will be asked to engage with EPA to a develop site-specific sampling and analysis plan to standardize sampling across all facilities. EPA will provide each facility with a sampling kit, with all sampling supplies included. Facilities will be responsible for

executing the sampling plan by collecting samples, preserving samples, and shipping wastewater samples to specific laboratories identified by EPA. EPA will contract with accredited analytical laboratories for each method included in the sampling plan; facilities will ship wastewater samples according to instructions provided by EPA. By EPA contracting directly with laboratories, this ensures that all wastewater samples will be analyzed to the same precision and using the same method for each analyte.

EPA estimates that each facility will collect grab samples during one day from up to two locations, such as the effluent from the wastewater treatment system and the final wastewater stream that is discharged to a surface water or POTW. The exact sample locations may vary by facility based on the treatment system configuration and/or type of operations. For the purposes of the ICR estimate, EPA estimates that all facilities will collect samples from two locations during the one-day sampling episode for a total of two wastewater samples per facility. In addition, EPA expects the facility will also collect one quality assurance sample during the one-day sampling episode. These quality assurance samples could include laboratory required quality assurance volumes or field quality assurance samples. Table 12-2 presents estimated burden (in hours) for the one-day sampling episode on a per facility basis by labor category. EPA expects that operators and operations managers will be involved in planning and implementing the wastewater treatment protocols.

Table 12-2. Estimated Burden for Sampling Program by Activity and Labor Category

Activity	Labor Category and Burden (hours)		
	Operator	Operations Manager	Total Burden per Activity
Pre-Sampling Episode Planning (e.g., pre-sampling coordination with EPA, input on site-specific sampling plan)	8.00	4.00	12.00
Sampling Preparation (e.g., reviewing site-specific sampling and analysis plan)	4.00	2.00	6.00
Sample Collection (e.g., 2 grab samples and 1 QA sample)	3.00	--	3.00
Sample Preservation/Shipment (e.g., preserving and cooling samples, packing and preparing coolers for shipment)	3.00	--	3.00
Sampling Oversight	--	4.00	4.00
Total	**18.00**	**10.00**	**28.00**

12(b) Estimate of Respondent Labor Costs

EPA obtained mean labor rates from the May 2021, United States Department of Labor, Bureau of Labor Statistics website for NAICS code 332800 (Coating, Engraving Heat Treating, and Allied Activities). Table 12-3 presents the labor data for 2021 (the latest year for which data are available) for the labor categories representing an operator, engineer, operations manager, and finance specialist. To account for additional costs to overhead and benefits, EPA calculated a 30 percent increase in the mean hourly earnings rate for each labor category. EPA used these calculated labor rates for the burden estimates.

Table 12-3. 2021 Mean Hourly Rates by Labor Category

Labor Category	Operator [a]	Engineer [b]	Operations Manager [c]	Finance Specialist [d]
Mean Hourly Rates ($/hour)	27.30	50.66	75.62	54.65

Source: 2021 National Occupational Employment and Wage Estimates for NAICS Code 332800 Water and Wastewater Treatment Plant Operator (occupation code 51-8031), Engineers (occupation code 17-2000), General and Operations Managers (occupation code 11-1021), and Financial Specialist (13-2000). https://www.bls.gov/oes/current/naics4_332800.htm#00-0000

a – Operator unloaded mean hourly wage of $21.00/hour times 1.3 loading (overhead/benefits) = $27.30/hour.

b – Engineer unloaded labor rate of $38.97/hour times 1.3 loading (overhead/benefits) = $50.66/hour.

c – Operations manager unloaded labor rates of $58.17/hour times 1.3 loading (overhead/benefits) = $75.62/hour.

d – Finance specialist unloaded labor rate of $42.04/hour times 1.3 loading (overhead/benefits) = $54.65/hour.

The direct labor cost to respondents to complete the questionnaire equals the time required to read and understand all of the instructions, gather relevant information and data, transfer it to the questionnaire response, review responses, and certify and submit the completed questionnaire. EPA calculated the estimated respondent burden for completion of the questionnaire using the estimated total response time per activity shown in Table 12-1 as well as the labor rates shown in Table 12-3 to calculate a total labor cost shown in Table 12-4. Table 12-4 includes estimates for the following types of respondents: not applicable (nonchromium finishing facilities that complete Section 1 only) and full response (chromium finishing facilities completing Sections 1 through 8).

Table 12-4. Total Estimated Respondent Labor Burden for the Questionnaire per Respondent

Response Category	Operator Total Labor Costs	Engineer Total Labor Costs	Operations Manager Total Labor Costs	Finance Specialist Total Labor Costs	Total Labor Burden Cost
Not Applicable	$40.95	$25.33	$113.43	$27.33	**$207.04**
Full Response	$341.25	$177.31	$491.54	$191.28	**$1,201.38**

Note: EPA assumes that questionnaire recipients that do not respond to the questionnaire will incur zero burden.

The total burden for the questionnaire equals the estimated burden per facility for all facilities EPA expects will respond. As noted previously in this supporting statement, for the purposes of estimating burden to the industry, EPA estimates the population of chromium finishing facilities at approximately 1,815. EPA expects that some number of facilities will not respond to the questionnaire. Although this ICR will be mandatory, the typical no response rate for effluent guidelines questionnaires is 10 percent. EPA also expects that approximately 15 percent of the questionnaire population will not be required to complete the full questionnaire because the facility does not perform chromium finishing operations or will cease all metal finishing and electroplating operations by the time the questionnaire is administered. Table 12-5 includes the number of respondents in each category (not applicable, full response, and no response), total burden, and total cost for the industry to respond to the questionnaire. The values presented in Table 12-5 also include hours for a portion of the respondents to consult with EPA's helpline.

EPA estimates that 10 percent of the questionnaire respondents, both not applicable responses and full responses, will spend 1 hour coordinating with the helpline. All values presented in Table 12-5 are rounded to the nearest whole hour or dollar.

Table 12-5. Estimated Questionnaire Respondents by Response Category and Total Estimated Burden

Response Category	Number of Responses	Number of Respondents Contacting Helpline	Total Operator Labor (hours)	Total Engineer Labor (hours)	Total Operations Manager Labor (hours)	Total Finance Specialist Labor (hours)	Total Labor (hours)	Total Operator Labor Cost ($)	Total Engineer Labor Cost ($)	Total Operations Manager Labor Cost ($)	Total Finance Specialist Labor Cost ($)	Total Labor Cost ($)
Not Applicable	272	27	435	136	408	136	1,115	$11,876	$6,890	$30,853	$7,433	$57,051
Full Response	1,361	136	15,788	4,764	8,847	4,764	34,163	$431,012	$241,349	$669,019	$260,362	$1,601,743
No Response	182	--	--	--	--	--	--	$-	$-	$-	$-	$-
Total	**1,815**	**163**	**16,223**	**4,900**	**9,255**	**4,900**	**35,278**	**$442,888**	**$248,239**	**$699,872**	**$267,795**	**$1,658,794**

For labor costs associated with sampling, EPA assumed that all sampling activities described in Section 12(a) will be completed by a combination of operators and the operations manager as shown in Table 12-2. To estimate the labor cost, EPA combined the hours presented in Table 12-2 with the labor rates shown in Table 12-3. The total labor cost for sampling per facility is shown in Table 12-6.

Table 12-6. Total Estimated Labor Burden for One-Day Sampling Episode per Facility

Operator Total Labor Cost ($)	Operations Manager Total Labor Cost ($)	Total Labor Burden ($)
$491.40	$756.21	**$1,247.61**

Using the total industry labor cost for the questionnaire shown in Table 12-5 and the total labor cost for sampling per facility shown in Table 12-6 combined with the number of facilities participating in sampling, EPA estimates the total labor cost associated with activities described in this ICR. The total labor associated with the questionnaire and wastewater sampling program is $1.68 million, as shown in Table 12-7.

Table 12-7. Total Estimated Respondent Labor Burden for Data Collection Activities

Activity	Number of Facilities Participating	Total Labor Burden (Dollars)
Questionnaire	1,815	$1,658,793.96
Wastewater Sampling	20	$24,952.20
	Total	**$1,683,746.16**

13. TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION

13(a) Estimating Capital/Start-up Operating and Maintenance Costs

EPA estimates there will be minimal other direct costs associated with responding to the questionnaire. All information requested in the questionnaire should be available from existing facility records and/or monitoring. Facilities are not required to collect and analyze additional samples to respond to the questionnaire.

Other costs for completing the questionnaire include printing/duplication of working copies and, for a select few facilities, shipping for those respondents that are unable to respond to the online platform. EPA has assumed that 2 percent of questionnaire respondents will respond with mailed hardcopies as opposed to online submittals. Most respondents will submit electronic questionnaire responses, which will reduce burden and ensure efficient transfer of data. EPA assumes all respondents will incur a printing rate of $0.10 per page for a paper copy for use as a working copy or a hardcopy file. EPA also assumes that any facility submitting a paper response will return the completed questionnaire via Federal Express e or other trackable delivery service that requires a signature to acknowledge receipt. EPA also included

cost for long distance phone charges. Although, most facilities have access to cell phones or other internet-based phone mechanisms that do not charge for long distance calls, EPA has included these costs at $0.05 per minute for calls into the helpline to cover facilities in rural areas.

Table 13-1 presents the estimated other direct costs for respondents related to the questionnaire.

Table 13-1. Total Other Direct Costs for Respondents to the Questionnaire

Activity	Number of Respondents	Total Printer/ Photocopying Cost [a]	Total Shipping Cost [b]	Total Phone/ Calling Costs [c]	Total
Questionnaire	1,815	$11,431.00	$290.67	$495.00	**$12,216.67**

a – Assumes printing of 70 pages for the questionnaire; $0.10/page print cost. Assumes all facilities will print the questionnaire once as a working copy.

b – Assumes 2 percent of questionnaire respondents will send in a paper questionnaire via Federal Express (or another shipper with tracking). Assumes $8.90 shipping fee/package.

c – Assumes 10 percent of questionnaire respondents will contact the helpline for 60 minutes at a rate of $0.05/minute. EPA expects this to be an overestimate of the long-distance costs associated with the questionnaire.

As described in Section 12, a subset of chromium finishing facilities (approximately 20 facilities) will be required to have facility staff collect wastewater samples and transfer them to an EPA-contracted laboratory for analysis. This burden estimate assumes that EPA will contract directly with laboratories, provide each facility with a set of sampling supplies, and pre-pay the costs to ship coolers to the facility and to the laboratory. The only sampling supplies not provided by EPA would be ice required to cool wastewater samples immediately after collection and/or during preservation. Sampled facilities will be responsible for any long-distance phone charges associated with planning, supplies not provided by EPA. In addition to ice needed during sample collection, EPA estimates that each sampled facility will need to provide ice for filling coolers and keeping samples at the proper temperature during shipping. EPA estimates these other direct costs associated with wastewater sampling include those elements shown in Table 13-2.

Table 13-2. Total Other Direct Costs for Facilities Selected for Wastewater Sampling

Activity	Units Cost	Units	Number	Direct Cost ($)
Planning Calls (phone charges)	$3.00	$ per hour	2 hours	$6.00
Sample Supplies Not Provided by EPA (ice)	$10.00	$ per wastewater sample	3 wastewater samples per facility	$30.00
			Total Cost per Facility	$36.00
			Total Cost for Sampling at All Facilities	**$720.00**

13(b) Annualizing Capital Costs

EPA estimates that there will be no recuring capital costs associated with responding to the questionnaire or wastewater sampling. The one-time burden to respondents includes labor

costs described in Section 12 and other direct costs described in Section 13(a). Table 13-3 presents the total burden to the industry for the questionnaire and wastewater sampling.

Table 13-3. Total Estimated Respondent Burden and Cost Summary

Information Collection Activity	Number of Participating Facilities	Total Burden (Hours)	Total Labor Cost ($)	Total Other Direct Cost ($)	Total Cost ($)
Questionnaire	1,815	35,278	$1,658,793.96	$12,216.67	$1,671,010.63
Wastewater Sampling	20	560	$24,952.20	$720.00	$25,672.20
	Total	**35,838**	**$1,683,746.16**	**$12,936.67**	**$1,696,682.83**

EPA estimates that the total burden to the industry for responding to the questionnaire and wastewater sampling will be approximately 35,838 hours, or $1.7 million, including labor and other direct costs.

Burden means the total time, effort, and financial resources expended by persons to generate, maintain, retain, and disclose or provide information to or for a federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems to collect, validate, and verify information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control number for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OW-2022-0869, which is available for public viewing at the Water Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. An electronic version of the public docket is available through the Federal Data Management System (FDMS) at http://www.regulations.gov. Use the FDMS to view and submit public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select "Advanced Search" then key in the Docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID No. (EPA-HQ-OW-2022-0869) in any correspondence.

14. ANNUALIZED COST TO THE FEDERAL GOVERNMENT

Table 14-1 presents an estimate of the burden and labor costs that EPA will incur to administer the questionnaire. The table identifies the collection administration tasks to be performed by

EPA employees and contractors, with the associated hours required for each grouping of related tasks. EPA determined Agency labor costs by multiplying Agency burden figures by an average hourly Agency labor rate ($46.51/hour) for technical and managerial support using the Salary Table 2022-GS from the United States Office of Personal Management. This table can be found at the website https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/22Tables/html/GS_h.aspx. The government employee labor rates are $38.92 per hour for technical (GS-13, Step1) and $54.09 per hour for managerial (GS-15, Step 1). EPA determined contractor labor costs by multiplying contractor burden figures by an average contract labor rate of $100 per hour. This rate is consistent with current Agency contracts.

Table 14-2 presents the other direct costs associated with administering the questionnaire that will be incurred by EPA. For EPA and contractor other direct costs, EPA assumed mailing a cover letter announcing the questionnaire effort to all facilities and mailing hardcopy questionnaires to 2 percent of all respondents as described in Section 13(a).

Table 14-3 presents a list of the tasks EPA and its contractors will perform associated with the wastewater sampling program. These tasks include the following:

- Selecting facilities for wastewater sampling.
- Developing site-specific sampling plans and coordinating with facilities.
- Planning and conducting audits of each sampling episode.
- Ordering sampling supplies and preparing sampling kits for each sampled facility.
- Performing laboratory analysis and corresponding quality review for each collected sample.
- Reviewing and analyzing sampling results and documenting results of each sampling episode.

Table 14-3 includes an estimate of the burden and labor costs for each task and the total labor cost. Other direct costs associated with wastewater sampling include travel costs (for EPA's contractor staff to audit wastewater sampling at 4 facilities), costs associated with planning calls, costs for sample collection supplies, shipping costs to get sampling kits to facilities, shipping costs to transfer collected samples to analytical laboratories, and sample analysis costs. Table 14-4 shows the other direct costs incurred by EPA per sampled facility and the total cost for all 20 sampled facilities.

Table 13-3 and Table 14-5 summarize the total costs that the industry and the Agency will incur as a result of the ICR, respectively.

Table 14-1. Estimated Agency Burden and Labor Costs for the Questionnaire

Activity	Burden (hours)			Labor Cost		
	Agency	Contractor	Total Hours	Agency ($46.51/hour)	Contractor ($100/hour)	Total Cost
Develop questionnaire instrument	200	1,400	1,600	$9,301.00	$140,000.00	$149,301.00
Meet with trade association representatives	100	400	500	$4,650.50	$40,000.00	$44,650.50
Publish notice of anticipated ICR in Federal Register						
Respond to all comments received						
Revise questionnaire instrument based on reviewers' comments						
Design distribution approach	200	800	1,000	$9,301.00	$80,000.00	$89,301.00
Develop a mailing list database						
Develop a system to track mailing and receipt activities to improve mailing list						
Develop notification letters						
Mail questionnaire notification letters						
Develop and maintain email and phone helplines	60	327	387	$2,790.30	$32,700.00	$35,490.30
Maintain helpline database and develop documentation						
Track survey responses	200	3,919	4,119	$9,301.00	$391,900.00	$401,201.00
Review responses and assess potential for bias due to missing data						
Engineering follow-up to clarify responses						
Develop questionnaire database	40	400	440	$1,860.20	$40,000.00	$41,860.20
Upload and verify data						
Enter hardcopy survey responses	40	261	301	$1,860.20	$26,100.00	$27,960.20
Total	**840**	**7,507**	**8,347**	**$39,064.20**	**$750,700.00**	**$789,764.20**

Table 14-2. Estimated Other Direct Costs for the Agency to Administer the Questionnaire

Activity	Unit Costs [a]		Number of Units [b]		Total Cost ($)
Questionnaire Notification Mailout	$0.58	per letter	1,815	letters	$1,052.70
Hardcopy Questionnaires	$8.90	per package	36	packages	$323.07
				Total	**$1,375.77**

a – Questionnaire notifications will be sent out via United States Postal Service with a letter. Hardcopy questionnaires will be sent via Federal Express (or another shipper with tracking) at $8.90 shipping fee/package.

b – Assumes 2 percent of questionnaire respondents will not have access to the internet and request a hardcopy questionnaire.

Table 14-3. Estimated Agency Burden and Labor Costs for Wastewater Sampling

Activity	Burden (hours)			Labor Cost		
	Agency	Contractor	Total Hours	Agency ($46.51/hour)	Contractor ($100/hour)	Total Cost
Select facilities	40	80	120	$1,860.20	$8,000.00	$9,860.20
Develop site-specific sampling plans (e.g., pre-sampling calls with facilities, developing site-specific sampling and analysis plans)	80	280	360	$3,720.40	$28,000.00	$31,720.40
Plan and conduct sampling audits	25	136	161	$1,162.63	$13,600.00	$14,762.63
Prepare sample collection kits	--	80	80	$--	$8,000.00	$8,000.00
Laboratory analysis, data review, develop SOWs	80	500	580	$3,720.40	$50,000.00	$53,720.40
Process sampling data results, enter data into database, analyze data, document results for the record in sampling episode reports	120	420	540	$5,580.60	$42,000.00	$47,580.60
Total for All Facilities	**345**	**1,496**	**1,841**	**$16,044.23**	**$149,600.00**	**$165,644.23**

Table 14-4. Estimated Other Direct Costs for the Agency for Wastewater Sampling

Activity	Unit Costs		Number of Units		Total Cost ($)
Planning Calls (phone charges)	$3.00	per hour	2	hours per facility	$6.00
Sampling Audit Travel (airfare, hotel, per diem, car rental, long-distance charges and other miscellaneous ODCs)	$800.00	per trip	0.2	trip per facility (audit 20% of facilities)	$160.00
Sample Collection Supplies (bottles, labels, preservation supplies, sampling equipment)	$230.00	per set of supplies	1	set of supplies per facility	$230.00
Sample Analysis	$940.00	per sample	3	wastewater and QA samples per facility	$2,820.00
Shipping Costs (ice and postage)	$110.00	per cooler	3	number of coolers per facility	$330.00
Shipping Sample Kits/Coolers to Facilities	$80.00	per box	3	boxes of supplies per facility	$240.00
				Total Cost per Facility	$3,786.00
				Total Cost for All Facilities	**$75,720.00**

Table 14-5. Total Estimated Agency Burden and Cost Summary

Total Burden (hours)	Total Labor Cost ($)	Total Other Direct Cost ($)	Total Cost ($)
10,188	$955,408.43	$77,095.77	**$1,032,504.20**

EPA estimates that the total burden to the Agency for the questionnaire and wastewater sampling will be approximately 10,188 hours, or $1.03 million, including labor costs and other direct costs. EPA estimates that there will be no start-up or capital costs associated with completing the questionnaire.

15. REASON FOR ANY PROGRAM CHANGES OR ADJUSTMENTS IN BURDEN ESTIMATES FROM THE PREVIOUS APPROVED ICR

Since this is a one-time information collection, there are no changes to the information collection since the last OMB approval.

16. COLLECTION OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED

16(a) Technical Analyses Supported by the Questionnaire

Current ELGs do not contain requirements for PFAS; however, PFAS has been found in wastewater discharges from facilities in Metal Finishing and Electroplating point source categories, particularly in those that perform or historically performed chromium finishing operations. EPA will use the data collected through the questionnaire and wastewater sampling program to determine if revisions to the Metal Finishing ELGs or the Electroplating ELGs are

warranted. If EPA determines revisions are warranted, EPA anticipates also using data in support of future rulemaking efforts. EPA will use the data collected through the questionnaire and wastewater sampling program to support the following types of analyses:

- **Subcategorization.** EPA will survey all chromium finishing facilities to fully capture the range of metal finishing and electroplating processes, PFAS use, wastewater types, and pollution control practices and technologies for the sector. Data from the respondents will help EPA determine whether the existing subcategorization of the industry is appropriate or additional/revised subcategorization is necessary for the Metal Finishing and Electroplating ELGs. Under such a regime, EPA will develop estimates of pollutant mass loads, and estimates of compliance costs associated with any proposed regulatory options for each subcategory. It is important that EPA fully understand these differences to construct subcategories that are meaningful and ELGs that incorporate differences within the industry.
- **Evaluation of Chromium Finishing Processes and Wastewaters.** EPA will use data collected to analyze chromium finishing industry manufacturing processes; PFAS use and potential transfer to wastewater; wastewater generation and characteristics (including PFAS concentrations and flow rates); and available and demonstrate pollution control technologies and practices. EPA will also analyze facility-wide pollution prevention practices and wastewater treatment systems to determine the wastewaters that contain PFAS, the treatment technologies that are applicable to those wastewaters, the effectiveness of these treatment units, and the final discharge characteristics from chromium finishing facilities.
- **Technical Feasibility Analysis.** EPA will evaluate technically feasible technology options, including control technologies and pollution prevention and recycle practices, for the spectrum of chromium finishing operations and facility characteristics. EPA will assess the technical feasibility of each technology option by determining its availability within the industry as well as the degree to which it effectively eliminates the generation of pollutants and/or removes or destroys PFAS.
- **Assessment of Technology Costs.** EPA will use data collected to estimate the industry-specific direct capital costs, operating and maintenance costs, and recurring costs (e.g., waste disposal) of the pollution control technologies and practices, with a focus of identifying technologies that can effectively reduce or eliminate PFAS as potential technology basis options for ELGs. EPA will develop methodologies for estimating facility-specific and industry compliance costs associated with technology options considered based on variables such as wastewater flow rate and performance criteria.
- **Estimation of Effluent Limitations and Pretreatment Standards.** EPA may develop effluent limitations guidelines and pretreatment standards for PFAS. EPA will base these limitations and standards upon a detailed statistical analysis of wastewater

discharge data from chromium finishing facilities which have implemented the pollution control technology options and PFAS management practices considered by EPA. EPA may develop effluent limitations for maximum daily and average monthly discharge levels.

- **Environmental Assessment and Environmental Justice.** EPA will perform an environmental assessment to determine the potential impacts of chromium finishing discharges on aquatic life and human health, as well as on the proper operation of POTWs and other treatment works. EPA will also evaluate the potential impact of chromium finishing discharges of small, disadvantaged, or minority communities. These assessments will characterize the potential risk posed by the discharges and will assist EPA in projecting the environmental and economic benefits of potential revisions to the regulation.
- **Estimation of Economic Impacts on Facilities.** EPA will evaluate the economic impact of possible technology options on individual facilities. The analysis will combine facility-specific compliance costs with facility financial data and to estimate the total costs and impacts of the possible regulation. A goal of the analysis will be to identify facilities that might close due to PFAS control requirements. A standard financial decision model would predict closure if the net present value of future income is negative. The forecasted income for the facility is a major determinant of the net present value of continued operations.
- **Estimation of Economic Impacts on Companies.** The costs for all chromium finishing facilities that a given company owns will be estimated and aggregated. The combined cost to the company will be analyzed in the context of the company's financial status to evaluate the overall impact. The company-level impact analysis allows EPA to assess the effect of ELG revisions at a different level of business organization. Companies that own multiple facilities may not be able to afford the total cost of upgrading all facilities, even if it makes economic sense for each individual facility. Because such financing decisions are commonly made at company-level rather than the facility-level, EPA needs to assess economic impacts at the company-level in addition to the facility-level. In the case of single-establishment firms, this component of the analysis is unnecessary because facility-level and company-level impacts will coincide. Whenever possible, EPA will collect data needed to assess company-level impacts from secondary sources. This reduces the burden on questionnaire recipients. Secondary sources provide data for multi-site, publicly reporting companies but are inadequate for single-facility companies or multi-site, non publicly reporting companies.
- **Estimation of Secondary Impacts.** EPA will assess the secondary impacts of projected facility closures on other segments of the economy. For example, employment losses and reductions in derived demand for input goods/services

could potentially erode the economic condition of households and firms in communities around closing chromium finishing facilities. Estimation of these community impacts depends upon employment and labor income data from the questionnaire effort, macroeconomic multipliers, general economic data, and economic data from secondary sources. EPA also plans to consider the secondary impacts felt by small businesses and foreign trade. EPA will utilize secondary sources whenever possible during these analyses to minimize the burden placed upon questionnaire recipients. Data from secondary sources will include detailed industry trade statistics, labor cost and commodity price indices, labor and commodity input requirement coefficients, regional income multipliers, regional employment, small business statistics, and other relevant secondary source information.

16(b) Collection Schedule

The specific dates for distribution, response receipt, and data collection activities for the questionnaire have not yet been established but will include the activities in Table 16-1.

Table 16-1. Collection Schedule

Activity	Estimate of Schedule
EPA notification to questionnaire recipients	15 days after OMB Approval
Facilities submit responses	60 days following receipt
EPA reviews responses and evaluates need for follow-up	3 months following questionnaire completion
EPA conducts follow-up to collect all missing or incomplete information	2 months
EPA completes questionnaire database	4 weeks
EPA selects and notifies facilities for wastewater sampling	3 months following questionnaire completion
Wastewater sampling data collection occurs	2 months following notification
Wastewater sampling data reviewed and analytical database populated	4 months

16(c) Publication of Results

All responses containing or consisting of information claimed as CBI will be so identified in the questionnaire database. EPA regulations governing CBI appear at 40 CFR Part 2, Subpart B.

Information that has not been claimed as CBI may be shared with any interested parties. Nonexempt information is not protected from disclosure under the Freedom of Information Act (FOIA). Results of EPA's analyses become publicly available most often in three ways: (1) within materials placed in the public docket supporting the rulemaking, (2) within development and supporting documents otherwise published in support of the rulemaking, and (3) within any proposed and final rules published in the *Federal Register* if the data is to be used in any

rulemaking effort. These documents are available through EPA's website and on regulations.gov.

17. DISPLAY OF THE EXPIRATION DATE FOR OMB APPROVAL OF THE INFORMATION COLLECTION

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

18. CERTIFICATION FOR REDUCTION ACT SUBMISSIONS

EPA can comply with all provisions of the Certification for Paperwork Reduction Act Submissions.

PART B OF THE SUPPORTING STATEMENT

1. QUESTIONNAIRE RATIONALE

The census questionnaire and subsequent wastewater sampling program for chromium finishing facilities will provide information essential to establishing a need for and developing, as necessary, revised regulations under Section 304(m) of the Clean Water Act. These data are necessary for characterizing the nationwide and industry-specific status of chromium finishing facilities' locations, types of operations, PFAS use, wastewater generation and management, wastewater characteristics, available pollution control technologies and practices, and for assessing the financial status of the industry potentially affected by proposed regulations.

1(a) Population of Interest

EPA intends to use responses from the questionnaire and data collected through the wastewater sampling program to inform further and more detailed analyses in the future. To obtain valuable information on the industry's wastewater management practice as specifically regards PFAS, EPA has targeted a subset of facilities in the Metal Finishing and Electroplating point source categories conducting certain chromium operations, including chromium plating, chromium anodizing, chromic acid etching, and chromate conversion coating operations.

EPA first plans to administer a questionnaire as a census to all likely chromium finishing facilities in the United States, a subset the metal finishing and electroplating industry regulated at 40 CFR Parts 413 or 433. Based on data collected by EPA, the Agency has identified and compiled mailing addresses for approximately 1,815 chromium finishing facilities in the United States. All active metal finishing and electroplating facilities that conduct one or more of the specified chromium finishing operations will be required to complete the questionnaire regardless of size, geography, ownership, production, and whether the facility discharges wastewater directly to surface waters, indirectly to surface waters through POTWs, or does not discharge wastewater at all.

A subset of chromium finishing facilities that complete the questionnaire (approximately 20) will also be required to collect and submit for analyze wastewater characterization samples. EPA will determine the specific facilities to participate in the wastewater sampling program based on technical information collected through the questionnaire.

1(b) Response Rate/No Response

EPA's Office of Water plans to administer the data collection, including a one-time questionnaire and wastewater sampling program, under the authority of Section 308 of the Federal Water Pollution Control Act, 33 USC., Section 1318. All recipients of the questionnaire and wastewater sampling request will be required to participate and submit complete response.

No response is relatively low for questionnaires sent under the authority of Clean Water Act Section 308. The typical no response rate for effluent guidelines questionnaires is 10 percent. EPA will employ several measures to reduce no response. The cover letter and instructions delivered to each recipient will explain the legal authority, responsibility to respond, reasons for the questionnaire, and penalty for no response. Delivery or nondelivery of cover letters will be tracked using United States Postal Service or other traceable delivery option; thus, signatures of the recipients will be required to confirm receipt. Email and phone helplines will be operated while the questionnaire is in the field so that technical, financial, and administrative questions can be addressed. Recipients not responding to the questionnaire by the deadline date may be phoned or notified again by mail to encourage response, to answer questions, and to determine the reason(s) for the no response.

To minimize no response, EPA solicited comments on a draft list of questions and worked closely with industry experts to refine questions so that they are easy to understand with clearly defined and familiar terms, are formatted in a logical sequence, and request data that are readily available within the industry. In this manner, EPA expects to minimize inaccurate or incomplete responses to questions that can occur due to misunderstanding and misinterpretation as well as the unintentional skipping of questions by respondents who respond via hardcopy (the electronic version of the questionnaire will prevent incomplete submissions).

The design and implementation of the questionnaire will employ several quality assurance techniques to reduce the frequency of such errors. These techniques include the following:

- Review of question language for ambiguity and clarity.
- Use of an easily followed sequence of questions and stopping points.
- Avoidance of questions requiring an open-ended response.
- Provision of a limited number of carefully considered responses to each question.
- Provision of clear definitions of units of measurement and of technical terms.
- Provision of clear instructions with references to the definitions.
- Provision of helplines via email and a toll-free number to assist respondents.
- Review of questions by engineers, scientists, and economists who will phone respondents to obtain missing information and resolve problems and inconsistencies.
- Use of a web-based questionnaire platform (Qualtrics) to require completion of all required questions.
- Provision of the Qualtrics platform to require specific response formats (e.g., numeric values where a number is requested) and acceptable value ranges.
- Use of double-entry keypunch verification on any hardcopy submittals.

2. COLLECTION OF INFORMATION

2(a) Stratification/Sample Selection

As the questionnaire is to be distributed as a census, no stratification or sampling scheme has been designed. The main data sources that contributed to the list of likely chromium finishing facilities (recipients) are described in Part A, Section 4.

3. ESTIMATION PROCEDURE

As this questionnaire is designed as a census and response is mandatory, no sample size estimation is needed. However, there will be some no response, thus EPA will not have perfect information and will analyze this after results are received.

EPA estimated the response rate when calculating the sample size based on historic data and information from the ICR conducted in support of the previous ELGs. As noted previously in this supporting statement, the typical no response rate for ELGs questionnaires is 10 percent and EPA expects the no response rate to this questionnaire to be similar.

4. ACCURACY/PRECISION

As this questionnaire is designed as a census and respondents are the best available sources of information and data for their facilities, accuracy and precision concerns are not an issue.

5. SPECIALIZED SAMPLING PROCEDURES

No special sampling procedures are planned for this questionnaire.

6. DATA COLLECTION

This will be a single incident data collection; no periodic data collection is planned at this stage. Under this ICR, EPA intends to conduct a questionnaire of chromium finishing facilities within the Metal Finishing and Electroplating point source categories. The collection methods for each of these efforts have been described previously in this supporting statement.

7. RESPONSE RATE/NO RESPONSE/DATA UTILITY

7(a) Response Rate

EPA expects that the response rate will be relatively high for this mandatory questionnaire effort, which will be conducted under the authority of Section 308 of the Clean Water Act. The sample size for the questionnaire is 1,815 facilities. The typical no response rate for effluent guidelines questionnaires is 10 percent. EPA would strive to improve the response rate by reminder letters, emails, and/or phone calls. Furthermore, after receiving the responses, EPA intends to adjust the questionnaire weights based on the actual no response rate and to review publicly available information to determine if nonrespondents appear to have different

characteristics than respondents. EPA would examine these characteristics both for the entire industry and for subgroups in the analyses. For any differences, EPA intends to determine the major causes, and to incorporate appropriate adjustments for bias.[2]

7(b) No Response

EPA recognizes that some no response is unavoidable, and in past questionnaire efforts, EPA has waived the duty to respond in extreme and rare cases (e.g., natural disasters) which also might occur for this survey effort. As noted throughout this supporting statement, EPA will implement efforts to reduce no response, including use of an easy-to-use format, operating helplines, and following up with potential nonrespondents.

7(c) Burden Reduction

EPA designed the questionnaire to include burden-reducing features. The questionnaire contains initial screening questions that direct respondents that do not qualify as chromium finishing facilities to indicate their status and then submit their initial responses without the need to respond to the remaining questions. Additionally, the questionnaire will contain screening questions which direct respondents to skip questions or whole sections that reference activities or operations that are not conducted at the facility. The questionnaire also groups similar topic questions together and will offer drop-down menu and checkbox selections to simplify responses, thus minimizing the number of text responses requiring input.

The questionnaire consists of 84 questions and should not require a burden of more than 26 hours (on average) for each facility's respondents to complete, verify, and submit. EPA will implement the questionnaire online which will facilitate access and completion.

For those respondents without internet access, the cover letter and instruction packet will inform the respondent on how to request a paper questionnaire that can then be completed and mailed to EPA's contractor for input into the electronic system. EPA therefore concludes that completing the questionnaire does not represent an overly burdensome task.

7(d) Data Utility

The data collected through this ICR will serve to update current information, fill in missing data, and profile the universe of chromium finishing facilities in the United States with sufficient information to support ELG revisions. Subsequently, if EPA pursues a rulemaking, data will be used to conduct further analyses of the Metal Finishing and Electroplating point source categories and support proposed and/or final rulemaking analyses.

[2] Bias is the difference between the expected value of an estimate and the true value of a parameter or quantity being estimated. If the data collection process generates estimates that are consistently (or on average) above or consistently below the true value, the data collection process is biased

8. TESTS OF PROCEDURES

EPA does not intend to pre-test the questionnaire. For more than 30 years, EAD has conducted surveys of numerous industrial sectors to collect information to support regulation development activities in the effluent guidelines program. While EPA develops different questionnaires for each industry, there are common elements for all industries. The questionnaires collect the same basic data such as information about processes, treatment, and financial status. Thus, when EPA develops a questionnaire for a particular industry, it generally tailors the questions for specific terms and processes used by that industry. In past years, EPA has relied predominantly on active participation by trade groups and their members in reviewing the questionnaires. In EPA's experience, such collaboration generally tends to better reflect the industry at large than pre-tests. As discussed in Part A of this supporting statement, EPA has already engaged several trade associations and industry experts regarding this data collection. EPA expects to continue to discuss and refine this questionnaire with industry experts prior to implementation. For this reason, EPA considers additional review through the pre-test process to be unnecessary for this industry.

9. CONTACT INFORMATION

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