

SUPPORTING STATEMENT FOR
REPORTING AND RECORDKEEPING REQUIREMENTS FOR THE NATIONAL
EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS:
PAINT STRIPPING AND MISCELLANEOUS SURFACE COATING OPERATIONS AT
AREA SOURCES

(40 CFR PART 63, SUBPART HHHHHH)

U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards
Research Triangle Park, NC 27711

May 2007

PART A OF THE SUPPORTING STATEMENT

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection.

This Information Collection Request (ICR) is entitled "Reporting And Recordkeeping Requirements For The National Emission Standards For Hazardous Air Pollutants: Paint Stripping And Miscellaneous Surface Coating Operations At Area Sources (40 CFR PART 63, SUBPART HHHHHH)".

1(b) Short Characterization/Abstract.

The National Emissions Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR part 63, subpart (HHHHHH)) are being proposed. These standards are part of EPA's Integrated Urban Strategy to reduce cancer risk from area sources under section 112(k)(3)(C) of the CAA. When these proposed standards are final, affected sources will have to comply with recordkeeping and reporting requirements of the new rule.

This ICR includes the burden for activities that will be conducted in the first three years following promulgation of the National Emissions Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. The owners or operators of facilities with these operations would read instructions to determine how they will be affected by the rule.

New and existing sources will also have to submit an initial notification. New sources will also be required to submit a notification of compliance status and an annual compliance report and maintain records. Because the compliance date for existing sources is 3 years after the NESHAP is promulgated, other recordkeeping and reporting activities for existing sources do not begin until 3 years after promulgation. Therefore, they are not included in the burden estimate for the first 3 years.

Although not necessary for this ICR, respondent burden estimates for year 4 are included in Attachment A4, B3, C4, and the agency burden estimates are provided in Attachment D4 to provide perspective on the annual burden when the rule is fully implemented.

This information is being collected to assure compliance with 40 CFR part 63, subpart HHHHHH. Owners or operators will keep records and submit required reports to EPA or the delegated State regulatory authority. Notifications, reports, and records are essential in determining compliance; and are required, in general, of all sources subject to NESHAP. Owners or operators subject to the miscellaneous surface coating NESHAP will maintain records and retain them for at least 5 years following the date of such reports and records.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection.

Section 112 of the Clean Air Act (CAA) requires EPA to develop NESHAP for both new and existing major and area sources. A major source is defined in section 112(a) as any stationary source or group of stationary sources located within a contiguous area and under common control that emits, or has the potential to emit, considering controls, in the aggregate, 10 tons per year

(tons/yr) of any one HAP or 25 tons/yr of any combination of HAP. An area source is defined in section 112(a) as any stationary source that is not a major source. Thus, area sources do not emit nor have the potential to emit HAP at or above the 10 or 25 tons/yr thresholds.

The CAA further requires EPA to determine the HAP emitted by area sources that pose the greatest threat to public health in urban areas. Specifically, section 112(k)(3)(B) instructs EPA to develop a list of at least 30 HAP emitted by area sources that pose the greatest threat to public health in the largest number of urban areas. Once that is accomplished, sections 112(c)(3) and 112(k)(3)(B)(ii) direct EPA to identify source categories of area sources that represent 90 percent of the emissions of the 30 identified HAP. Section 112(k)(3)(C) requires EPA to also develop a strategy under section 112 or other laws to reduce the incidence of cancer attributable to exposure to HAP emitted by stationary sources by not less than 75 percent, considering control of emissions of HAP from all stationary sources and resulting from measures implemented by EPA or by the States under the Act or other laws. On July 19, 1999, EPA published its Integrated Urban Strategy, which included both the list of 30 HAP and the initial list of area source categories (64 FR 38706), which included "Paint Stripping Operations". On June 26, 2002 and November 22, 2002, EPA added "Autobody Refinishing Paint Shops" (67 FR 43112) and "Plastic Parts and Products (Surface Coating)" (67 FR 70427), respectively, to the list of area source categories. The scope of the autobody refinishing category has since been revised to include all motor vehicle and mobile equipment refinishing to reflect the fact that sources that perform mobile equipment refinishing use many of the same coatings as used in motor vehicle refinishing, and motor vehicles

and mobile equipment are often refinished at the same or similar sources.

Since the development of the area source category list, EPA has determined that it is technically feasible to regulate emissions from these three source categories by a single set of emission standards. The processes, emission points, emission characteristics, and emission controls for plastic parts and products surface coating and autobody refinishing are very similar. Additionally, paint stripping is often performed as part of the surface preparation for both plastic parts and autobody refinishing which, by regulating within the scope of a single set of standards, reduces the burden of complying with multiple standards on the sources performing both the paint stripping and subsequent coating. This single set of emission standards to address all three categories also minimizes the cost of developing, permitting, and enforcing the standards.

In summary, the information obtained during the data gathering phase of the project demonstrated that the processes, emission characteristics, and applicable control technologies for facilities in these categories are similar. Based on these factors, EPA concluded that these three categories are to be treated as a single source category for the purposes of this rulemaking. For purposes of this preamble and proposed rule, the term paint stripping and miscellaneous surface coating will be used to indicate that the three source categories of plastic parts and products (surface coating), autobody refinishing, and paint stripping have been treated as a single source category for purposes of developing this rule.

Certain notifications and reports, as described in this information collection request, are necessary to enable the Administrator to identify existing sources subject to the NESHP

and to determine if the standards are being achieved.

2(b) Practical Utility/Users of the Data.

In order to minimize HAP emissions from paint stripping, motor vehicle and mobile equipment refinishing operations, and miscellaneous surface coating, facilities must comply with certain equipment requirements and management practices. The information generated by the recordkeeping and reporting requirements described in this ICR will be used by EPA to ensure that personnel who spray coatings are certified in the proper selection, mixing, and application of coatings. Additionally, the information will ensure that filters and spray guns at spray booths of affected facilities meet the minimum efficiency requirements. Further, this information will help EPA to maintain an updated inventory of all sources with paint stripping or miscellaneous surface coating operations.

Adequate recordkeeping and reporting are necessary to ensure compliance with the standards, as required by the CAA. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court. To minimize the burden, much of the information, which is kept on site, could be reviewed by enforcement personnel during an inspection and would not need to be routinely reported to the agency.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication.

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA Regional Office. Otherwise, the information is sent directly to the delegated State or local agency. If a State or local agency has

adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the State or local agency can be sent to the Administrator in lieu of the report required by the Federal standards.

During the development of subpart HHHHHH, three different source categories were combined to be regulated under a single subpart. Subpart HHHHHH now includes sources that perform surface coating on both motor vehicles/mobile equipment, metal or plastic parts, or paint stripping, and this consolidation removed any duplicate rule requirements. Therefore, no duplication exists.

3(b) Public Notice Required Prior to ICR Submission to OMB.

A public notice of this collection will be provided in the notice of proposed rulemaking of the NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

3(c) Consultations.

During the development of this rule, EPA met with industry in order to obtain data and input on the training, recordkeeping and reporting requirements from the facilities potentially affected by this rule.

For motor vehicle or mobile equipment finishing or refinishing, EPA met with the Alabama Collision Repair Industries Association, Automotive Aftermarket Industry Association, Automotive Service Association, California Autobody Association, Cedar Rapids (Iowa) Autobody Association, Coordinating Committee For Automotive Repair (C-CAR), Collision Industry Council, Inter-Industry Conference on Auto Collision Repair (I-CAR), I-CAR Education Foundation, National Association of Fleet Administrators, National Automobile Dealers Association, National

Paint and Coatings Association, and the National Institute for Automotive Service Excellence (ASE).

For miscellaneous parts and products surface coating, EPA contacted the Composite Manufacturers Association in order to obtain data and input from the facilities potentially affected by this rule. The EPA also set up a web-based pilot-project for sources to visit and submit data on miscellaneous surface coating operations. Neither of these sources provided data or input on the proposed rulemaking or associated burdens.

For paint stripping, the EPA will alert industry groups such as the Halogenated Solvents Industry Alliance (HSIA), and State and Local governments of its pending publication. The EPA will also involve the Small Business Administration (SBA) to assist in outreach to small business entities that may not otherwise be aware of the proposed action.

The public will also have the opportunity to review and comment on the proposed rule and the ICR during the specified comment period.

3(d) Effects of Less Frequent Collection.

The proposed rule includes the minimum requirements needed to demonstrate continuous compliance with the rule. Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the proposed standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that equipment requirements and work practices are applied. If the information required by the standards were collected less frequently, the likelihood of detecting inadequate equipment or operating practices would decrease and emissions would increase.

3(e) General Guidelines.

The standards require affected facilities to maintain all records, including reports and notifications for at least 5 years. This is consistent with the General Provisions as applied to the standards. Also, the retention of records for 5 years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the 5 years. The EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than 5 years.

Additionally, no reports or compliance notifications from existing sources are submitted in the first 3 years after promulgation of the rule. The only burden for owners and operators of existing sources in the first 3 years is to read and understand the rule requirements and submit an initial notification letter, and maintain records indicating that all spray painters have received appropriate training. The other activities take place after the compliance date. The compliance date is 3 years after the promulgation date, so compliance reporting does not begin until the fourth year after promulgation.

3(f) Confidentiality.

All information submitted to EPA for which a claim of confidentiality is made will be safeguarded according to EPA policies set forth in title 40, chapter 1, part 2, subpart B -- Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976, amended by 43 FR 39999,

September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions.

None of the reporting or recordkeeping requirements contain sensitive questions.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and NAICS Codes.

Subpart HHHHHH has affected sources from three different source categories, which include: paint stripping, miscellaneous surface coating, and motor vehicle and mobile equipment surface coating. The following are the industrial classification of entities potentially regulated by the proposed rule. This list is not meant to be exhaustive, but it serves as a guide for entities required to submit information discussed in this ICR.

Table 1: NAICS Categories for Various Affected Sources

Category	NAICS	Examples of Potentially Regulated Entities
Paint Stripping		
Natural Gas Liquid Extraction	211112	Natural Gas Liquid Extraction.
Spices and Extracts	311942	Spices and Extracts.
Mobile Homes	321991	Mobile Homes.

Basic Chemical Manufacturing	325110 325120 325131 325188 325192 325193 325199	Petrochemicals, Industrial Gases, Inorganic Dyes and Pigments, Basic Inorganic and Organic Chemicals, Cyclic Crude and Intermediates, Ethyl Alcohol.
Plastics Material Synthetic Resins, and Nonvulcanizable Elastomers	325211	Plastics Material Synthetic Resins, and Nonvulcanizable Elastomers.
Paint and Coating Manufacturing	325510	Paint and Coating Manufacturing.
Miscellaneous Chemical Production and Preparation	325998	Miscellaneous Chemical Production and Preparation.
Alumina Refining	331311	Alumina Refining.
All Other Plastics Products	326199	All Other Plastics Products.
Other Metal Containers	332439	Other Metal Containers.
All Other Miscellaneous Fabricated Metal Products	332999	All Other Miscellaneous Fabricated Metal Products.
All Other Miscellaneous Manufacturing	339999	All Other Miscellaneous Manufacturing.

Waste Treatment and Disposal	562211 562212 562213 562219	Hazardous Waste Treatment and Disposal, Solid Waste Landfill, Solid Waste Combustors and Incinerators, Other Nonhazardous Waste Treatment and Disposal.
Materials Recovery	562920	Materials Recovery.
Reupholstery and Furniture Repair	811420	Reupholstery and Furniture Repair.
Miscellaneous Surface Coating		
Aerospace Equipment	336413 336414 336415 54171	Aircraft engines, aircraft parts, aerospace ground equipment.
Automobile Parts	335312 336111 336211 336312 33632 33633 33634 33637 336399	Engine parts, vehicle parts and accessories, brakes, axles, etc. Motor vehicle body manufacturing and automobile assembly plants.
Extruded Aluminum	331316 331524 332321 332323	Extruded aluminum, architectural components, coils, rod, and tubes.
Heavy Equipment	33312 333611 333618	Tractors, earth moving machinery.
Job Shops	332312 332722 332813 332991 332999 334119 336413 339999	Any of the products from the miscellaneous metal parts and products segments. Manufacturing industries not elsewhere classified (e.g., bezels, consoles, panels, lenses).
Large Trucks and Buses	33612 336211	Large trucks and buses.

Metal Buildings	332311	Prefabricated metal: buildings, carports, docks, dwellings, greenhouses, panels for buildings.
Metal Containers	33242 81131 322214 331513 332439	Drums, kegs, pails, shipping containers.
Metal Pipe and Foundry	331111 331513 33121 331221 331511	Plate, tube, rods, nails, etc.
Rail Transportation	33651 336611 482111	Brakes, engines, freight cars, locomotives.
Recreational Vehicles	3369 331316 336991 336211 336112 336213 336214 336399	Motorcycles, motor homes, semi trailers, truck trailers.
Rubber-to-Metal Products	326291 326299	Engine mounts, rubberized tank tread, harmonic balancers.
Structural Steel	332311 332312	Joists, railway bridge sections, highway bridge sections.
Other Transportation Equipment	336212 336213 336214 336999 33635 56121 8111 56211	Miscellaneous transportation related equipment and parts. Truck trailer manufacturing. Motor home manufacturing. Travel trailer and camper manufacturing.
Other industrial and commercial	337214	Office furniture, except wood.

Miscellaneous Plastic Parts	32614, 32615 326199	Plastic foam products (e.g., pool floats, wrestling mats, life jackets). Plastic products not elsewhere classified (e.g., name plates, coin holders, storage boxes, license plate housings, cosmetic caps, cup holders).
Office Equipment	333313	Office machines.
Electronics	33422	Radio and television broadcasting and communications equipment (e.g., cellular telephones).
Medical Equipment	339111, 339112	Medical equipment and supplies.
Sporting Equipment	33992	Sporting and athletic goods.
Signs	33995	Signs and advertising specialties.
Marine Equipment	336612 713930	Boat building Marinas, including boat repair yards
Motor Vehicle and Mobile Equipment Refinishing		
Commercial	441110 441120 811121	New Car Dealers; Used Car Dealers; Automotive Body, Paint, and Interior Repair and Maintenance.
Government	Not Applicable	Government entities, besides Department of Defense, that maintain vehicles, such as school buses, police and emergency vehicles, transit buses, or highway maintenance vehicles.

4(b) Information Requested.

(i) Data items. The recordkeeping and reporting requirements of the proposed rule include the following:

- Initial notification letter §63.11175(a)
- Notification of compliance status §63.11175(b)¹
- Annual compliance reports §63.11176(a)¹
- Records of painter certification §63.11177(a)
- Records of filter efficiency §63.11177(b)²
- Records of spray gun efficiency §63.11177(c)³
- Records of notifications and annual reports §63.11177(d)¹
- Records of annual paint stripping HAP usage §63.11177(e)⁴
- Records of current methylene chloride minimization §63.11177(f)³
- Records of deviations from compliance §63.11177(g)¹

(ii) Respondent Activities. Both new and existing sources must read the rule and understand the rule requirements. Respondents must also submit notifications and annual reports according to the timelines specified in the rule. Each source must maintain all applicable records for 5 years.

5. THE INFORMATION COLLECTED: AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

1 These notifications/reports/records are not required of paint stripping facilities using less than 125 gallons of methylene chloride (MeCl) containing paint stripper per year (which approximately equals MeCl emissions of 1,000 pounds per year based on typical stripper formulations.)

2 These records are only required if a source does not have a polyester fiber or fiberglass filter. If a source has another type of filter, it is assumed that the manufacturer of the alternative filter would perform the test. The only burden on the source would be the burden associated with recording and maintaining a file of this filter efficiency as reported by the manufacturer.

3 These records are only required for sources without an HVLP that opt to test non-HVLP type spray guns.

4 These records are only required of sources with paint stripping operations with annual usage of more than 125 gallons of paint stripper containing methylene chloride.

5(a) Agency Activities.

A list of Agency Activities is provided in Attachments D1 to D3.

5(b) Collection Methodology and Management.

Reports submitted to the Agency and records maintained by the respondents may be tabulated and published for use in compliance and enforcement programs.

5(c) Small Entity Flexibility.

Affected facilities are primarily small entities (e.g., small businesses). Because of the large number of small businesses that are likely to be affected by this rule, the reporting requirements for the individual facilities are minimal. There are no quarterly or semiannual requirements as there are with most regulated large industries. The burden is further minimized since costly monitoring equipment, or performance tests are not required. For this ICR, it is estimated that out of the existing sources 93.5 percent (37,224 sources) are estimated to be small businesses.

5(d) Collection Schedule.

The information collection schedule is different for new and existing sources subject to the proposed rule. New sources are required to submit their initial notification and notification of compliance⁵ within 120 days after their initial start-up or 120 days after this rule is promulgated. Existing sources have one year from the date the rule is promulgated to submit the initial notification and three years and 60 days after the rule is

⁵ Notifications of compliance and annual compliance reports are not required from paint stripping facilities with annual usage of 125 gallons or less of MeCl containing paint stripper.

promulgated to submit the notification of compliance, (if required. These two notifications are one-time-only burdens.

New and existing sources must also submit an annual report⁵ for each calendar year by March 1 of the following year, starting with the year of the initial compliance date for the source. This corresponds to the first annual report being submitted in years 2 and 4 of this ICR for new and existing sources, respectively.

Records of each notification, annual report and deviations from compliance, if required, must be kept at the source for five years. Owners of affected miscellaneous surface coating operations must maintain additional records of painter certification dates and refresher training dates, filter and spray booth efficiency, and spray gun manufacturers. Owners of an affected paint stripping operation must maintain additional records of annual methylene chloride (MeCl) containing paint stripper used for paint stripping operations. Owners of affected paint stripping operations that use 150 gal or more of paint stripper containing MeCl, per year, must maintain a record of their MeCl minimization plan on-site for the duration of their facility's operations. The data items and respondent activities for miscellaneous surface coating operations are summarized in Attachments A1 to A3 (commercial entities), Attachments B1 to B3 (government-owned entities). Since the respondent activities are slightly different, the requirements for affected paint stripping operations are summarized in Attachments C1 to C3.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden.

Tables A1-A3, B1-B3, and C1-C3 in Attachments A to C present an itemized breakdown of the reporting and recordkeeping

requirements in the first 3 years for the respondents subject to the proposed NESHAP.

The individual burdens are expressed under standardized headings consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, the specific tasks and major assumptions have been identified. Responses to this information collection are mandatory. 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.

6(b) Estimating Respondent Costs.

(i) Labor Costs.

Labor rates, on a per-hour basis, are from the United States Department of Labor, Bureau of Labor Statistics, Occupational Employment Statistics, May 2005. The occupational category that is the most similar to personnel at affected facilities with miscellaneous surface coating operations or paint stripping operations is assumed to be an average (mean) of "Automotive Body, Paint, Interior, and Glass Repair," "Plastics Product Manufacturing," and "Fabricated metal product manufacturing." This ICR uses the labor rates for the following occupations within these categories: for technical labor, an average of automotive body and related repairers, and environmental engineers; for managerial labor, first-line supervisors/managers of mechanics/installers/repairers, and engineering managers; for clerical labor, file clerks and secretaries. The hourly mean wage rates from May 2005 have been multiplied by a factor of 1.6 so that overhead and benefits are included in the per-hour labor rates used to estimate respondent costs. The resulting rates used

are \$45 for technical personnel, \$58 for management and \$19 for clerical personnel.

(ii) Capital Costs.

Capital costs usually include any produced physical good needed to provide the information, such as machinery, computers, and other equipment. EPA does not anticipate that respondents will incur capital costs in carrying out the information collection requirements covered in this ICR.

(iii) Operations and Maintenance Costs.

Sources will incur costs for photocopying and mailing notifications and reports. For this ICR, a one-time operations cost of \$1 for mailing and making a photocopy of each initial notification and notification of compliance, and a \$3 operations cost for mailing and making a photocopy of each annual report is included in the burden estimate.

6(c) Estimating Agency Burden and Cost.

The only costs to Agency are those costs associated with EPA Regions and States reviewing the rule, and reviewing notifications and reports submitted by the respondents and maintaining a list of units subject to the Miscellaneous Surface Coating Operations at Area Sources rule. The labor rates for Agency employees are based on the estimated labor rates from the United States Department of Labor, Bureau of Labor Statistics, Occupational Employment Statistics, May 2005 for "Federal, State and Local Government". This ICR uses the labor rates for the following occupations within this category: engineering managers for managerial labor; environmental engineering technicians for technical labor; and secretaries, except legal, medical, and

executive for clerical labor. The hourly mean wage rates from May 2005 have been multiplied by a factor of 1.6 so that overhead and benefits are included in the per-hour labor rates used to estimate respondent costs. The resulting rates used are \$32.75 for technical personnel, \$72.45 for management and \$25.06 for clerical personnel.

6(d) Estimating the Respondent Universe and Total Burden and Costs.

The EPA estimates that the total number of potentially affected facilities is approximately 39,812 sources. This number of sources is expected to remain constant over the period of this ICR. However, it is expected that an average of 1,593 new commercially-owned motor vehicle and mobile equipment refinishing sources and 25 new miscellaneous surface coating sources will start-up each year over the next three years to replace existing sources which may go out of business.⁶ No new state or local government-owned mobile equipment refinishing shops are expected to start-up during this ICR period. A table showing the estimated number of sources for each category is shown in Table 2 below.

⁶ See the Memorandum in Docket #EPA-OAR-2005-0526 entitled "Estimating The Number Of Automotive Refinishing Shops And The Projected Number Of New Shops".

Table 2 Summary of Respondent Universe

Category	Number of Existing Sources in Year 1	New Sources in Year 1 of ICR*	New Sources in Year 2 of ICR	New Sources in Year 3 of ICR
Miscellaneous Surface Coating	781	50	25	25
Commercial Motor Vehicle and Mobile Equipment Refinishing	32,545	3,186	1,593	1,593
Government Motor Vehicle and Mobile Equipment Refinishing	250	0	0	0
Paint Stripping	3,000	0	0	0
Totals	36,576	3,236	1,618	1,618

* See Table A1, note (d).

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

Table 3 Number of Responses per Respondent per Year

Category	(A) Number of New Respondents (Year)	(B) Number of Reports for New Respondents	(C) Number of Existing Respondents	(D)* Number of Reports for Existing Respondents	(F) Number of Existing Respondents That Keep Records but Do	(E) Total Annual Responses $E = (A \times B) + (C \times D) + F$
Miscellaneous Surface	100	3	781	1	0	1081

Coating						
Commercial Motor Vehicle and Mobile Equipment Refinishing	6,372	3	32,345	1	0	51,461
Government Motor Vehicle and Mobile Equipment Refinishing	0	3	250	1	0	250
Paint Stripping	0	3	1,050	1	1,950	3,000
Total	6,472		34,426			55,792

* Responses for existing sources are only the initial notification, which is a one-time burden during this three year ICR period.

The number of Total Annual Responses is 55,792, these responses include initial notifications, notifications of compliance status, and annual compliance reports and it does not count recordkeeping activities as a response. Details regarding these estimates may be found in Attachment Tables A1 to C3.

Due to the schedule of information collected under this ICR, the number of sources subject to reporting and recordkeeping requirements will vary over the three-year period. Respondent burden is calculated based on the assumption that the total number of units will remain constant during years one through three even though some units will qualify as new units under this proposed rule.

6(e) Bottom Line Burden Hours and Cost Tables.

(i) Respondent Tally. An annual breakdown for each of the reporting, and recordkeeping activities required by the proposed rule is presented in Tables A1 through C3 in Attachments A, B,

and C, which represent years 1 through 3 of this ICR. Attachment A presents the burden on commercially-owned miscellaneous surface coating facilities, Attachment B presents the burden on government-owned miscellaneous surface coating facilities, and Attachment C presents the burden on paint stripping sources. The estimate of total annual hours requested from the respondents was based on the assumptions outlined in section 6(d) of this ICR. The EPA estimated the respondent burden for the first 3 years after the promulgation of the NESHAP by totaling the hours per year for technical, managerial, and clerical staff at the facility. Due to the absence of capital or start-up costs in the first 3 years, there are no annualized capital costs. There are minimal operating and maintenance costs incurred in the first 3 years for each notification and report that is mailed to the Agency and copied for a facility record. The average annual respondent burden for the 3-year period is 246,703 hours, \$10,154,722 in labor costs and \$24,670 in operating and maintenance costs. A summary of the total annual burden and costs are shown in Table 4 below.

Table 4 Summary of Burden and Costs for the Affected Source Categories

	Sector	Commercial Misc. Surface Coating	Government Misc. Surface Coating	Paint Stripping	Total
Year 1	Burden Hours	604,346	4,175	17,250	625,771
	Labor Cost	\$ 25,332,136	\$ 174,920	\$ 749,655	\$ 26,256,711
	O&M cost	\$ 38,967	\$ 250	\$ 3,000	\$ 42,217
Year 2	Burden Hours	41,801	-	9,660	51,461
	Labor Cost	\$ 1,629,992	\$ -	\$ 419,807	\$ 2,049,798
	O&M cost	\$ 12,944	\$ -	\$ -	\$ 12,944

Year 3	Burden Hours	45,620	-	17,258	62,877
	Labor Cost	\$ 1,795,962	\$ -	\$ 361,695	\$ 2,157,657
	O&M cost	\$17,798	\$ -	\$ 1,050	\$ 18,848
Annual Average	Burden Hours	230,589	1,392	14,723	246,703
	Labor Cost	\$ 9,586,030	\$ 58,307	\$ 510,386	\$10,154,722
	O&M cost	\$ 23,236	\$ 83	\$ 1,350	\$ 24,670

(ii) The Agency Tally. The bottom line Designated Administrator burden hours and costs, presented in Tables D1 through D3 in Attachment D, were calculated by totaling the hours per year for technical, managerial, and clerical staff, and by totaling the cost column. The average annual Agency burden over the first 3 years is 12,004 hours and \$698,462 of labor costs. There are no capital, start-up or operating and maintenance costs in the first 3 years. A summary of each year of Agency Burden is presented below in Table 5.

Table 5 Summary of Agency Burden for Years 1-3 of this ICR.

		Agency
Year 1	Burden Hours	27,035
	Labor Cost	\$ 1,790,172
	O&M cost	\$ -
Year 2	Burden Hours	3,721
	Labor Cost	\$ 126,528
	O&M cost	\$ -
Year 3	Burden Hours	5,256
	Labor Cost	\$ 178,687
	O&M cost	\$ -
3-year Average	Burden Hours	12,004
	Labor Cost	\$ 698,462
	O&M cost	\$ -

(iii) Variation in the Annual Bottom Line. The total respondent labor costs for years 1, 2, and 3 are \$26,256,711; \$2,049,798; and \$2,157,657, respectively. The total O&M costs are \$42,217; \$12,944; and \$18,848, respectively. The corresponding total number of respondent hours during this period is 625,771 hours, 51,461 hours, and 62,877 hours, which are shown in Table 4 above and Attachments A1 to C3. The variation in the burden for each of the three years is a result of the number of information collection activities required, based on the initial collection schedule and the fact that some burdens are one-time-only information collection activities. Starting in year four, which is shown in Attachments A4, B4, and C4, both existing and new sources are required to meet all the reporting and recordkeeping requirements and the annual burden is expected to stay relatively constant from that point forward.

During the first 3 years, the Agency will be reviewing the regulation, and reviewing the initial notifications from all sources and the compliance notifications and initial annual compliance reports from the new sources. In years 1, 2, and 3, the Agency will expend 27,035; 3,721; and 5,256 total hours in labor, respectively. The corresponding costs for each year are \$1,790,172; \$126,528; and \$178,687.

6(f) Reasons for Change in Burden.

This is the first submittal of this burden estimate; therefore, this section is not applicable.

6(g) Burden Statement.

The annual public reporting and recordkeeping burden for this collection of information is estimated to average approximately 4.4 hours per response. This burden is estimated by

dividing the average annual burden hours over the three-year period (246,703) hours by the total number of annual responses during the three-year period (55,792). Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or 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 for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the 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 numbers 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 docket for this ICR under Docket ID No. EPA-HQ-OAR-2005-0526, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA West Building, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA/DC Public Reading Room is open from 8 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is 202-566-1744, and the telephone number for the Air and Radiation Docket

Center is 202-566-1742.

An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view 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. When in the system, select "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 Office for EPA. Please include the EPA Docket ID No. EPA-HQ-OAR-2005-0526 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting the information.

List of Attachments

- **Attachment A**

- o Table A1. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Commercial Miscellaneous Surface Coating Operations at Area Sources - Year 1
- o Table A2. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Commercial Miscellaneous Surface Coating Operations at Area Sources - Year 2
- o Table A3. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Commercial Miscellaneous Surface Coating Operations at Area Sources - Year 3
- o Table A4. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Commercial Miscellaneous Surface Coating Operations at Area Sources - Year 4 (all existing sources comply)

- **Attachment B**

- o Table B1. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Government Miscellaneous Surface Coating Operations at Area Sources - Year 1
- o Table B2. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Commercial Miscellaneous Surface Coating Operations at Area Sources - Year 2
- o Table B3. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Commercial Miscellaneous Surface Coating Operations at Area Sources - Year 3

- o Table B4. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Commercial Miscellaneous Surface Coating Operations at Area Sources - Year 4 (all existing sources comply)

- **Attachment C**

- o Table C1. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Paint Stripping Operations at Area Sources - Year 1
- o Table C2. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Paint Stripping Operations at Area Sources - Year 2
- o Table C3. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Paint Stripping Operations at Area Sources - Year 3
- o Table C4. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Paint Stripping at Area Sources - Year 4 (all existing sources comply)

- **Attachment D**

- o Table D1. Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the Paint Stripping and Miscellaneous Surface Coating Operations At Area Sources - Year 1
- o Table D2. Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the Paint Stripping and Miscellaneous Surface Coating Operations At Area Sources - Year 2
- o Table D3. Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the Paint Stripping and Miscellaneous Surface Coating Operations At Area Sources - Year 3
- o Table D4. Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of the

Paint Stripping and Miscellaneous Surface Coating
Operations At Area Sources - Year 4 (all existing
sources comply)