

Table A1. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Commercial Miscellaneous Surface Coating Operations at Area Sources - Year 1

19 19 (G) (G) Footnotes Non-Non-Labor Burden Item	(A) Respondent Hours Per Occurrence (Technical hours)	Non-Labor Costs Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondents Per Year (a)	45	58	19	Total Labor Costs Per Year (b)	Total Non-Labor Costs Per Year	Footnotes
						(E) Technical Hours Per Year @\$45.15 (CXD)	(F) Management Hours Per Year @\$58.48 (E x 0.05)	(G) Clerical Hours Per Year @\$19.03 (E x 0.1)			
1. Applications	Not applicable			#VALUE!							
2. Surveys and Studies	Not applicable			#VALUE!		#VALUE!	#VALUE!	#VALUE!	#VALUE!		#VALUE!
3. Reporting Requirements											
A. Read and Understand Rule Requirements	5	\$0	1	5	35,731	178,655	8,933	17,866	\$8,928,641	\$0	c
B. Required Activities	not applicable										
C. Create Information											
1) Initial Notification Letter	1	\$1	1	1	35,731	35,731.00	1,786.55	3,573.10	\$1,785,728	\$35,731	c, d
2) Notification of Compliance Status	2	\$1	1	2	3,236	6,472.00	323.60	647.20	\$323,451	\$3,236	c, e
3) Annual compliance report	2	\$3	1	2	0	0.00	0.00	0.00	\$0	\$0	f
4. Recordkeeping Requirements											
A. Read Instructions	Included in 3.A			#VALUE!		#VALUE!	#VALUE!	#VALUE!	#VALUE!		
B. Plan Activities	not applicable			#VALUE!		#VALUE!	#VALUE!	#VALUE!	#VALUE!		
C. Implement Activities	not applicable			#VALUE!		#VALUE!	#VALUE!	#VALUE!	#VALUE!		
D. Develop Record System	8	\$0	1	8	35,731	285,848	14,292	28,585	\$14,285,825	\$0	c, g
E. Record information											
1) Records of painter certification	0.25	\$0	2.4	0.6	35,731	Not Applicable	Not Applicable	21,439			h
2) Records of filter efficiency	0.25	\$0	1	0.25	32	8.09	0.40	0.81	\$404	\$0	i
3) Records of spray gun	1.5	\$0	1	1.5	0	0.00	0.00	0.00	\$0	\$0	j
4) Records of deviation from the rule requirements and corrective actions taken	1	\$0	1	1	162	161.80	8.09	16.18	\$8,086	\$0	k
F. Personnel Training	Not applicable										
G. Time for audits	Not applicable										
TOTAL:						#VALUE!	#VALUE!	#VALUE!	#VALUE!	\$38,967	
Summary of Respondent Burden Annualized Capital and Startup O & M Summary					Total Hours #VALUE!	Labor #VALUE!	Non-Labor \$38,967	Total #VALUE!			
					0	\$0	\$0	\$0			
					0	0	0	0			

- a Assumes that a total of 35,731 miscellaneous surface coating or commercially-owned motor vehicle and mobile equipment refinishing facilities will exist in any given year of this ICR. It is estimated that 1,618 new affected sources per year will be constructed. Existing sources will shutdown after a period of time and be replaced with new sources, but the total number of affected automotive refinishing shops expected to become subject to this rule will not change over this ICR period.
- b Labor references an average of the Bureau of Labor Statistics rates in the Automotive Body, Paint, Interior, and Glass Repair Industry (NAICS code 811120), Fabricated Metal Product Manufacturing (NAICS code 332000) and Plastics Product Manufacturing (NAICS code 236100), for the following occupations: automotive body and related repairers, first-line supervisors/managers of mechanics, installers, and repairers, and file clerks, engineering managers, environmental engineers, and clerical positions. These rates are fully loaded (adjusted by an overhead and profit rate). Hourly rates are as follows: technical at \$45.15, management at \$58.48, and clerical at \$19.03. One hour of technical work requires 6 minutes of clerical and 3 minutes of managerial support.
- c One-time only costs.
- d Assumes that 1,618 new affected sources were constructed or reconstructed between proposal and promulgation, and another 1,618 new sources were constructed within 1 year after the promulgation of this rule. These sources are both considered new sources, and are required to submit an initial notification within 120 days of start-up. The existing affected sources must also submit their initial notification within one year from promulgation, which makes for a total of 35,781 miscellaneous surface coating or motor vehicle or mobile equipment refinishing sources submitting an initial notification within one year of promulgation of this rule.
- e All new sources (3,236) are required to submit a notification of compliance status within 120 days of start-up or from the promulgation of this rule, whichever is later. Existing sources have three years and 60 days to submit this notification and are thus excluded from the initial 3-year ICR period.
- f The new affected sources will have to submit their first annual compliance report by March 1 in the calendar year following their initial year of compliance. Therefore no reports will be submitted in the first year of this ICR. Existing sources will not have to submit their first annual compliance report until March 1 of the 4th year after promulgation of this rule and are thus excluded from the initial 3-year ICR period.

- g A facility will develop a simple system to track the date of each employee's initial certification and most recent refresher training. Painter certification records must be completed by both new and existing sources within the first year.
- h Assumes that each facility has 2.4 painters, on average. A record of the certification must be kept for each painter at the facility, and entering the record for each painter is expected to take 15 minutes. Certifications are good for 5-years and it is assumed that each year, 20 percent of the painters will need to have their records updated. However, in the first year, all painters need their records entered into the system.
- i Assumes 1% of affected sources will opt to test the filter efficiency of filter that are not polyester fiber or fiberglass. If a source opts to test the efficiency of a filter it is assumed that the filter manufacturer would perform the test and the burden on the source would only be the time to record and file the efficiency of this filter based on the results of the manufacturer's test.
- j Only sources without an HVLP gun are required to maintain records on the testing of non-HVLP type spray guns. It is assumed that no source will opt for a testing of their spray gun, and all sources with non-HVLP type spray guns will purchase new guns in response to the rule before the effective date and there are no recordkeeping costs associated with this requirement.
- k The number of sources expected to record a deviation for the rule requirements is based on the assumption of a 95 percent compliance rate. Approximately 5 percent of the estimated 3,236 new sources that are required to be in compliance with the rule in year 1 are expected to have some type of violation of the proposed work practices in any given year.

Table A2. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Commercial Miscellaneous Surface Coating Operations at Area Sources - Year 2

19 19 (G) (G) Tota Total Labr Labor Costs Burden Item	(A) Respondent Hours Per Occurrence (Technical hours)	Non-Labor Costs Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondents Per Year (a)	45	58	19	Total Labor Costs Per Year (b)
						(E) Technical Hours Per Year @\$45.15 (CXD)	(F) Management Hours Per Year @\$58.48 (E x 0.05)	(G) Clerical Hours Per Year @\$19.03 (E x 0.1)	
1. Applications	Not applicable			#VALUE!					
2. Surveys and Studies	Not applicable			#VALUE!		#VALUE!	#VALUE!	#VALUE!	#VALUE!
3. Reporting Requirements									
A. Read and Understand Rule Requirements	5	\$0	1	5	1,618	8,090	405	809	\$404,314
B. Required Activities	not applicable								
C. Create Information									
1) Initial Notification Letter	1	\$1	1	1	1,618	1,618.00	80.90	161.80	\$80,863
2) Notification of Compliance Status	2	\$1	1	2	1,618	3,236.00	161.80	323.60	\$161,726
3) Annual compliance report	2	\$3	1	2	3,236	6,472.00	323.60	647.20	\$323,451
4. Recordkeeping Requirements									
A. Read Instructions	Included in 3.A			#VALUE!		#VALUE!	#VALUE!	#VALUE!	#VALUE!
B. Plan Activities	not applicable			#VALUE!		#VALUE!	#VALUE!	#VALUE!	#VALUE!
C. Implement Activities	not applicable			#VALUE!		#VALUE!	#VALUE!	#VALUE!	#VALUE!
D. Develop Record System	8	\$0	1	8	1,618	12,944	647	1,294	\$646,902
E. Record information									
1) Records of painter certification	0.25	\$0	2.4	0.6	7,156	Not Applicable	Not Applicable	4,294	
2) Records of filter efficiency	0.25	\$0	1	0.25	49	12.14	0.61	1.21	\$606
3) Records of spray gun	1.5	\$0	1	1.5	0	0.00	0.00	0.00	\$0
4) Records of deviation from the rule requirements and corrective actions taken	1	\$0	1	1	243	242.70	12.14	24.27	\$12,129
F. Personnel Training	Not applicable								
G. Time for audits	Not applicable								
TOTAL:						#VALUE!	#VALUE!	#VALUE!	#VALUE!
						Total Hours #VALUE!	Labor #VALUE!	Non-Labor \$12,944	Total #VALUE!
						0	\$0	\$0	\$0
						0	0	0	0
						Summary of Respondent Burden Annualized Capital and Startup O & M Summary			

- a Assumes that a total of 35,731 facilities will exist in any given year of this ICR. It is estimated that 1,678 new affected sources per year will be constructed. Existing sources will shutdown after a period of time and be replaced by a number of affected automotive refinishing shops expected to become subject to this rule will not change over this ICR period.
- b (NAICS code 236100), for the following occupations: automotive body and related repairers, first-line supervisors/managers of mechanics, installers, and repairers, and file clerks, engineering managers, environmental engineers, and other occupations. These rates are fully loaded (adjusted by an overhead and profit rate). Hourly rates are as follows: technical at \$45.15, management at 58.48, and clerical at \$19.03. One hour of technical work requires 6 minutes of clerical and other work.
- c One-time only costs.
- d Year 2 represents the third calendar year after the promulgation of this rule. It is assumed that 1,618 new affected sources were constructed or reconstructed during this year and are subject to the initial notification requirements.
- e All new sources in year 2 (1,618) are required to submit a notification of compliance status within 120 days of start-up or from the promulgation of this rule, whichever is later.
- f The new affected sources will have to submit their first annual compliance report by March 1 in the calendar year following their initial year of compliance. Therefore the 3,236 new sources constructed or reconstructed by year 2 will have to submit their first annual compliance report by March 1 in year 2.
- g A new facility will develop a simple system to track the date of each employee's initial certification and most recent refresher training.
- h Assumes that each facility has 2.4 painters, on average. A record of the certification must be kept for each painter at the facility, and entering the record for each painter is expected to take 15 minutes. Certifications are good for one year. That 20 percent of the certifications from 35,781 existing and new facilities will have to be updated in the record system each year.
- i Assumes 1% of affected sources will opt to test the filter efficiency of filter that are not polyester fiber or fiberglass. If a source opts to test the efficiency of a filter it is assumed that the filter manufacturer would perform the test. The time to record and file the efficiency of this filter based on the results of the manufacturer's test.
- j Only sources without an HVLP gun are required to maintain records on the testing of non-HVLP type spray guns. It is assumed that no source will opt for a testing of their spray gun, and all sources with non-HVLP type spray guns will respond to the rule before the effective date and there are no recordkeeping costs associated with this requirement.
- k The number of sources expected to record a deviation for the rule requirements is based on the assumption of a 95 percent compliance rate. Approximately 5 percent of the estimated 4,854 new sources that are required to be constructed in year 1 are expected to have some type of violation of the proposed work practices in any given year.

Total Non-Labor Costs Per Year	Footnotes
	#VALUE!
#VALUE! \$0	c
\$1,618	c, d
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Table A3. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Commercial Miscellaneous Surface Coating Operations at Area Sources - Year 3

19 19 (G) (G) Tota Total Labr Labor Costs	(A) Respondent Hours Per Occurrence (Technical hours)	Non-Labor Costs Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondents Per Year (a)	45	58	19	Total Labor Costs Per Year (b)
						(E) Technical Hours Per Year @\$45.15 (CXD)	(F) Management Hours Per Year @\$58.48 (E x 0.05)	(G) Clerical Hours Per Year @\$19.03 (E x 0.1)	
Burden Item									
1. Applications	Not applicable								
2. Surveys and Studies	Not applicable								
3. Reporting Requirements									
A. Read and Understand Rule Requirements	5	\$0	1	5	1,618	8,090	405	809	\$404,314
B. Required Activities	not applicable								
C. Create Information									
1) Initial Notification Letter	1	\$1	1	1	1,618	1,618.00	80.90	161.80	\$80,863
2) Notification of Compliance Status	2	\$1	1	2	1,618	3,236.00	161.80	323.60	\$161,726
3) Annual compliance report	2	\$3	1	2	4,854	9,708.00	485.40	970.80	\$485,177
4. Recordkeeping Requirements									
A. Read Instructions	Included in 3.A								
B. Plan Activities	not applicable								
C. Implement Activities	not applicable								
D. Develop Record System	8	\$0	1	8	1,618	12,944	647	1,294	\$646,902
E. Record information									
1) Records of painter certification	0.25	\$0	2.4	0.6	7,156	Not Applicable	Not Applicable	4,294	
2) Records of filter efficiency	0.25	\$0	1	0.25	65	16.18	0.81	1.62	\$809
3) Records of spray gun	1.5	\$0	1	1.5	0	0.00	0.00	0.00	\$0
4) Records of deviation from the rule requirements and corrective actions taken	1	\$0	1	1	324	323.60	16.18	32.36	\$16,173
F. Personnel Training	Not applicable								
G. Time for audits	Not applicable								
TOTAL:						35,936	1,797	7,887	\$1,795,962
						Total Hours	Labor	Non-Labor	Total
						45,620	\$1,795,962	\$17,798	\$1,813,760
						Annualized Capital and Startup	\$0	\$0	\$0
						O & M Summary	0	0	0

- a Assumes that a total of 35,731 facilities will exist in any given year of this ICR. It is estimated that 1,618 new affected sources per year will be constructed. Existing sources will shutdown after a period of time and be replaced by a number of affected automotive refinishing shops expected to become subject to this rule will not change over this ICR period.
- b (NAICS code 236100), for the following occupations: automotive body and related repairers, first-line supervisors/managers of mechanics, installers, and repairers, and file clerks, engineering managers, environmental engineers, and other occupations. These rates are fully loaded (adjusted by an overhead and profit rate). Hourly rates are as follows: technical at \$45.15, management at 58.48, and clerical at \$19.03. One hour of technical work requires 6 minutes of clerical and support.
- c One-time only costs.
- d Year 3 represents the third calendar year after the promulgation of this rule. It is assumed that 1,618 new affected sources were constructed or reconstructed during this year and are subject to the initial notification requirements.
- e All new sources in year 3 (1,618) are required to submit a notification of compliance status within 120 days of start-up or from the promulgation of this rule, whatever is later.
- f The new affected sources will have to submit their first annual compliance report by March 1 in the calendar year following their initial year of compliance. Therefore the 3,236 new sources constructed or reconstructed by year 2 will submit their reports in year 3.
- g A new facility will develop a simple system to track the date of each employee's initial certification and most recent refresher training.
- h Assumes that each facility has 2.4 painters, on average. A record of the certification must be kept for each painter at the facility, and entering the record for each painter is expected to take 15 minutes. Certifications are good for five years that the burden will be on a five year recurring basis for each facility.
- i Assumes 1% of affected sources will opt to test the filter efficiency of filter that are not polyester fiber or fiberglass. If a source opts to test the efficiency of a filter it is assumed that the filter manufacturer would perform the test and the source would only be the time to record and file the efficiency of this filter based on the results of the manufacturer's test.
- j Only sources without an HVLP gun are required to maintain records on the testing of non-HVLP type spray guns. It is assumed that no source will opt for a testing of their spray gun, and all sources with non-HVLP type spray guns will respond to the rule before the effective date and there are no recordkeeping costs associated with this requirement.
- k The number of sources expected to record a deviation for the rule requirements is based on the assumption of a 95 percent compliance rate. Approximately 5 percent of the estimated 6,472 new sources that are required to be constructed in year 3 are expected to have some type of violation of the proposed work practices in any given year.

Total Non-Labor Costs Per Year	Footnotes
\$0	c
\$1,618	c, d
\$1,618	c, e
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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)

19 19 (G) (G) Tota Total Non Non-Labor Burden Item	(A) Respondent Hours Per Occurrence (Technical hours)	Non-Labor Costs Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondents Per Year (a)	45	58	19	Total Labor Costs Per Year (b)	Total Non-Labor Costs Per Year
						(E) Technical Hours Per Year @\$45.15 (CXD)	(F) Management Hours Per Year @\$58.48 (E x 0.05)	(G) Clerical Hours Per Year @\$19.03 (E x 0.1)		
1. Applications	Not applicable									
2. Surveys and Studies	Not applicable									
3. Reporting Requirements										
A. Read and Understand Rule Requirements	5	\$0	1	5	1,618	8,090	405	809	\$404,314	\$0
B. Required Activities	not applicable									
C. Create Information						0	0	0		
1) Initial Notification Letter	1	\$1	1	1	1,618	1,618	81	162	\$80,863	\$1,618
2) Notification of Compliance Status	2	\$1	1	2	29,259	58,518	2,926	5,852	\$2,924,554	\$29,259
3) Annual compliance report	2	\$3	1	2	35,731	71,462	3,573	7,146	\$3,571,456	\$107,193
4. Recordkeeping Requirements						0	0	0		
A. Read Instructions	Included in 3.A					0	0	0		
B. Plan Activities	not applicable					0	0	0		
C. Implement Activities	not applicable					0	0	0		
D. Develop Record System	8	\$0	1	8	1,618	12,944	647	1,294	\$646,902	\$0
E. Record information						0	0	0		
1) Records of painter certification	0.25	\$0	2.4	0.6	7,156	Not Applicable	Not Applicable	4,294		
2) Records of filter efficiency	0.25	\$0	1	0.25	357	89	4	9	\$4,464	\$0
3) Records of spray gun	1.5	\$0	1	1.5	0	0	0	0	\$0	\$0
4) Records of deviation from the rule requirements and corrective actions taken	1	\$0	1	1	1,787	1,787	89	179	\$89,286	\$0
F. Personnel Training	Not applicable									
G. Time for audits	Not applicable									
TOTAL:						152,721	7,636	19,566	\$7,632,554	\$138,070
Summary of Respondent Burden					Total Hours	Labor	Non-Labor	Total		
Annualized Capital and Startup					179,923	\$7,632,554	\$138,070	\$7,770,624		
O & M Summary					0	\$0	\$0	\$0		
O & M Summary					0	0	0	0		

- a Assumes that a total of 35,731 facilities will exist in any given year of this ICR. It is estimated that 1,618 new affected sources per year will be constructed. Existing sources will shutdown after a period of time and be replaced with new sources number of affected automotive refinishing shops expected to become subject to this rule will not change over this ICR period.
- b (NAICS code 236100), for the following occupations: automotive body and related repairers, first-line supervisors/managers of mechanics, installers, and repairers, and file clerks, engineering managers, environmental engineers, and clerical positions. These rates are fully loaded (adjusted by an overhead and profit rate). Hourly rates are as follows: technical at \$45.15, management at \$58.48, and clerical at \$19.03. One hour of technical work requires 6 minutes of clerical and 3 minutes of support.
- c One-time only costs.
- d Year 4 represents the fourth calendar year after the promulgation of this rule. It is assumed that 1,618 new affected sources were constructed or reconstructed during this year and are subject to the initial notification requirement during this year.
- e All new sources from year 4 (1,618), as well as all the sources that are considered existing sources under this rule, are required to submit a notification of compliance status starting in year 4. The recordkeeping and reporting schedule for existing sources becomes applicable during year 4.
- f The new and existing affected sources will have to submit their first annual compliance report by March 1 in the calendar year following their initial year of compliance. It is assumed that starting with year 4 the entire population (35,781) of covered automotive refinishing facilities and miscellaneous surface coating facilities will submit an annual compliance report.
- g A new facility will develop a simple system to track the date of each employee's initial certification and most recent refresher training.
- h Assumes that each facility has 2.4 painters, on average. A record of the certification must be kept for each painter at the facility, and entering the record for each painter is expected to take 15 minutes. Certifications are good for 5-years and the burden will be on a five year recurring basis for each facility.
- i Assumes 1% of affected sources will opt to test the filter efficiency of filter that are not polyester fiber or fiberglass. If a source opts to test the efficiency of a filter it is assumed that the filter manufacturer would perform the test and the burden on the source would only be the time to record and file the efficiency of this filter based on the results of the manufacturer's test.
- j Only sources without an HVLP gun are required to maintain records on the testing of non-HVLP type spray guns. It is assumed that no source will opt for a testing of their spray gun, and all sources with non-HVLP type spray guns will purchase and respond to the rule before the effective date and there are no recordkeeping costs associated with this requirement.
- k The number of sources expected to record a deviation for the rule requirements is based on the assumption of a 95 percent compliance rate. Approximately 5 percent of the estimated 32,801 sources that are required to be in compliance with year 4 are expected to have some type of violation of the proposed work practices in any given year.

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Table B1. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Government-Owned Miscellaneous Surface Coating Operations at Area Sources - Year 1

19 19 (G) (G) Foot Footnotes Non Non-Labor	(A) Respondent Hours Per Occurrence (Technical hours)	Non-Labor Costs Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondents Per Year (a)	45	58	19	Total Labor Costs Per Year (b)	Total Non-Labor Costs Per Year	Footnotes
						(E) Technical Hours Per Year @\$45.15 (CXD)	(F) Management Hours Per Year @\$58.48 (E x 0.05)	(G) Clerical Hours Per Year @\$19.03 (E x 0.1)			
Burden Item											
1. Applications	Not applicable										
2. Surveys and Studies	Not applicable										
3. Reporting Requirements											
A. Read and Understand Rule Requirements	5	\$0	1	5	250	1,250	63	125	\$62,471	\$0	c
B. Required Activities	not applicable										
C. Create Information											
1) Initial Notification Letter	1	\$1	1	1	250	250.00	12.50	25.00	\$12,494	\$250	c, d
2) Notification of Compliance Status	2	\$1	1	2	0	0.00	0.00	0.00	\$0	\$0	c, d
3) Annual compliance report	2	\$3	1	2	0	0.00	0.00	0.00	\$0	\$0	d
4. Recordkeeping Requirements											
A. Read Instructions	Included in 3.A										
B. Plan Activities	not applicable										
C. Implement Activities	not applicable										
D. Develop Record System	8	\$0	1	8	250	2,000	100	200	\$99,954	\$0	
E. Record information											
1) Records of painter certification	0.25	\$0	2.4	0.6	250	Not Applicable	Not Applicable	150			
2) Records of filter efficiency	0.25	\$0	1	0.25	0	0.00	0.00	0.00	\$0	\$0	
3) Records of spray gun	1.5	\$0	1	1.5	0	0.00	0.00	0.00	\$0	\$0	
4) Records of deviation from the rule requirements and corrective actions taken	1	\$0	1	1	0	0.00	0.00	0.00	\$0	\$0	
F. Personnel Training	Not applicable										
G. Time for audits	Not applicable										
TOTAL:						3,500	175	500	\$174,920	\$250	
Summary of Respondent Burden					Total Hours	Labor	Non-Labor	Total			
Annualized Capital and Startup					4,175	\$174,920	\$250	\$175,170			
O & M Summary					0	\$0	\$0	\$0			
O & M Summary					0	0	0	0			

- ^a Assumes that a total of 250 government owned paint shops exist. This assumption estimates one government-owned paint shop per county, for counties with a population greater than 240,000. It is estimated that no new government owned paint shops will open and that this rule will only impact existing government owned paint shops. The only impacts in the first year for existing sources are to read the rule and submit the initial notification and to develop a record system and enter data on painter certifications.
- ^b Manufacturing (NAICS code 236100), for the following occupations: automotive body and related repairers, first-line supervisors/managers of mechanics, installers, and repairers, and file clerks, engineering managers, environmental engineers, and clerical positions. These rates are fully loaded (adjusted by an overhead and profit rate). Hourly rates are as follows: technical at \$45.15, management at 58.48, and clerical at \$19.03. One hour of technical work requires 6 minutes of clerical and 3 minutes of managerial support.
- ^c One-time only costs.
- ^d It is assumed that no new government-owned sources will open. Existing sources will not have to submit their first annual compliance report or notification of compliance status until March 1 of the 4th year after promulgation of this rule and are thus excluded from the initial 3-year ICR period.

Table B2. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Government-Owned Miscellaneous Surface Coating Operations at Area Sources - Year 2

19 19 (G) (G) Foot Footnotes Non Non-Labor	(A) Respondent Hours Per Occurrence (Technical hours)	Non-Labor Costs Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondents Per Year (a)	(E) Technical Hours Per Year @\$45.15 (CXD)	(F) Management Hours Per Year @\$58.48 (E x 0.05)	(G) Clerical Hours Per Year @\$19.03 (E x 0.1)	Total Labor Costs Per Year (b)	Total Non-Labor Costs Per Year	Footnotes
1. Applications	Not applicable										
2. Surveys and Studies	Not applicable										
3. Reporting Requirements											
A. Read and Understand Rule Requirements	5	\$0	1	5	0	0	0	0	\$0	\$0	
B. Required Activities	not applicable										
C. Create Information											
1) Initial Notification Letter	1	\$1	1	1	0	0.00	0.00	0.00	\$0	\$0	
2) Notification of Compliance Status	2	\$1	1	2	0	0.00	0.00	0.00	\$0	\$0	
3) Annual compliance report	2	\$3	1	2	0	0.00	0.00	0.00	\$0	\$0	
4. Recordkeeping Requirements											
A. Read Instructions	Included in 3.A										
B. Plan Activities	not applicable										
C. Implement Activities	not applicable										
D. Develop Record System	8	\$0	1	8	0	0	0	0	\$0	\$0	
E. Record information											
1) Records of painter certification	0.25	\$0	2.4	0.6	0	Not Applicable	Not Applicable	0	\$0	\$0	c
2) Records of filter efficiency	0.25	\$0	1	0.25	0	0.00	0.00	0.00	\$0	\$0	
3) Records of spray gun	1.5	\$0	1	1.5	0	0.00	0.00	0.00	\$0	\$0	
4) Records of deviation from the rule requirements and corrective actions taken	1	\$0	1	1	0	0.00	0.00	0.00	\$0	\$0	
F. Personnel Training	Not applicable										
G. Time for audits	Not applicable										
TOTAL:						0	0	0	\$0	\$0	
Summary of Respondent Burden					Total Hours	Labor	Non-Labor	Total			
Annualized Capital and Startup					0	\$0	\$0	\$0			
O & M Summary					0	0	0	0			

- a Assumes that a total of 250 government owned paint shops exist. This assumption estimates one government-owned paint shop per county, for counties with a population greater than 240,000. It is estimated that no new government owned paint shops will open and that this rule will only impact existing government owned paint shops. The only impacts in the second year for existing sources are enter data on renewed painter certifications.
- b Manufacturing (NAICS code 236100), for the following occupations: automotive body and related repairers, first-line supervisors/managers of mechanics, installers, and repairers, and file clerks, engineering managers, environmental engineers, and clerical positions. These rates are fully loaded (adjusted by an overhead and profit rate). Hourly rates are as follows: technical at \$45.15, management at \$58.48, and clerical at \$19.03. One hour of technical work requires 6 minutes of clerical and 3 minutes of managerial support.

Table B3. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Government-Owned Miscellaneous Surface Coating Operations at Area Sources - Year 3

19 (G) (G) Foot Footnotes Non-Non-Labor	(A) Respondent Hours Per Occurrence (Technical hours)	Non-Labor Costs Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondents Per Year (a)	45	58	19	Total Labor Costs Per Year (b)	Total Non-Labor Costs Per Year	Footnotes
						(E) Technical Hours Per Year @\$45.15 (CXD)	(F) Management Hours Per Year @\$58.48 (E x 0.05)	(G) Clerical Hours Per Year @\$19.03 (E x 0.1)			
Burden Item											
1. Applications	Not applicable										
2. Surveys and Studies	Not applicable										
3. Reporting Requirements											
A. Read and Understand Rule Requirements	5	\$0	1	5	0	0	0	0	\$0	\$0	
B. Required Activities	not applicable										
C. Create Information											
1) Initial Notification Letter	1	\$1	1	1	0	0.00	0.00	0.00	\$0	\$0	
2) Notification of Compliance Status	2	\$1	1	2	0	0.00	0.00	0.00	\$0	\$0	
3) Annual compliance report	2	\$3	1	2	0	0.00	0.00	0.00	\$0	\$0	
4. Recordkeeping Requirements											
A. Read Instructions	Included in 3.A										
B. Plan Activities	not applicable										
C. Implement Activities	not applicable										
D. Develop Record System	8	\$0	1	8	0	0	0	0	\$0	\$0	
E. Record information											
1) Records of painter certification	0.25	\$0	2.4	0.6	0	Not Applicable	Not Applicable	0	\$0	\$0	c
2) Records of filter efficiency	0.25	\$0	1	0.25	0	0.00	0.00	0.00	\$0	\$0	
3) Records of spray gun	1.5	\$0	1	1.5	0	0.00	0.00	0.00	\$0	\$0	
4) Records of deviation from the rule requirements and corrective actions taken	1	\$0	1	1	0	0.00	0.00	0.00	\$0	\$0	
F. Personnel Training	Not applicable										
G. Time for audits	Not applicable										
TOTAL:						0	0	0	\$0	\$0	
Summary of Respondent Burden					Total Hours	Labor	Non-Labor	Total			
Annualized Capital and Startup					0	\$0	\$0	\$0			
O & M Summary					0	0	0	0			

- a Assumes that a total of 250 government owned paint shops exist. This assumption estimates one government-owned paint shop per county, for counties with a population greater than 240,000. It is estimated that no new government owned paint shops will open and that this rule will only impact existing government owned paint shops. The only impacts in the third year for existing sources are enter data on renewed painter certifications.
- b Manufacturing (NAICS code 236100), for the following occupations: automotive body and related repairers, first-line supervisors/managers of mechanics, installers, and repairers, and file clerks, engineering managers, environmental engineers, and clerical positions. These rates are fully loaded (adjusted by an overhead and profit rate). Hourly rates are as follows: technical at \$45.15, management at \$58.48, and clerical at \$19.03. One hour of technical work requires 6 minutes of clerical and 3 minutes of managerial support.
- c Assumes that each facility has 2.4 painters, on average. A record of the certification must be kept for each painter at the facility, and entering the record for each painter is expected to take 15 minutes. Certifications are good for 5-years. It is assumed that 20 percent of the certifications from 250 existing facilities will have to be updated in the record system each year.

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

19.019.03 (G) (G) Foot Footnotes Non Non-Labor	(A) Respondent Hours Per Occurrence (Technical hours)	Non-Labor Costs Per Occurrence	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A x B)	(D) Number of Respondents Per Year (a)	45.15	58.48	19.03	Total Labor Costs Per Year (b)	Total Non-Labor Costs Per Year	Footnotes	
						(E) Technical Hours Per Year @\$45.15 (CXD)	(F) Management Hours Per Year @\$58.48 (E x 0.05)	(G) Clerical Hours Per Year @\$19.03 (E x 0.1)				
Burden Item												
1. Applications	Not applicable											
2. Surveys and Studies	Not applicable											
3. Reporting Requirements												
A. Read and Understand Rule Requirements	5	\$0	1	5	0	0	0	0	\$0	\$0		
B. Required Activities	not applicable											
C. Create Information												
1) Initial Notification Letter	1	\$1	1	1	0	0.00	0.00	0.00	\$0	\$0		
2) Notification of Compliance Status	2	\$1	1	2	250	500.00	25.00	50.00	\$24,989	\$250	c, d	
3) Annual compliance report	2	\$3	1	2	250	500.00	25.00	50.00	\$24,989	\$750	d	
4. Recordkeeping Requirements												
A. Read Instructions	Included in 3.A											
B. Plan Activities	not applicable											
C. Implement Activities	not applicable											
D. Develop Record System	8	\$0	1	8	0	0	0	0	\$0	\$0		
E. Record information												
1) Records of painter certification	0.25	\$0	2.4	0.6	0	Not Applicable	Not Applicable	0			e	
2) Records of filter efficiency	0.25	\$0	1	0.25	0	0.00	0.00	0.00	\$0	\$0		
3) Records of spray gun	1.5	\$0	1	1.5	0	0.00	0.00	0.00	\$0	\$0		
4) Records of deviation from the rule requirements and corrective actions taken	1	\$0	1	1	13	12.50	0.63	1.25	\$625	\$0		
F. Personnel Training	Not applicable											
G. Time for audits	Not applicable											
TOTAL:						1,013	51	101	\$50,602	\$1,000		
Summary of Respondent Burden					Total Hours	1,164	Labor	\$50,602	Non-Labor	\$1,000	Total	\$51,602
Annualized Capital and Startup						0	\$0	\$0			\$0	
O & M Summary						0	0	0			0	

^a Assumes that a total of 250 government owned paint shops exist. This assumption estimates one government-owned paint shop per county, for counties with a population greater than 240,000. It is estimated that no new government owned paint shops will open and that this rule will only impact existing government owned paint shops. Existing sources are required to be in compliance with the rule by year four, and as such they must submit a notification of compliance status, an annual compliance report, and enter data on renewed painter certifications.

^b Labor references an average of the Bureau of Labor Statistics rates in the Automotive Body, Paint, Interior, and Glass Repair Industry (NAICS code 811120), Fabricated Metal Product Manufacturing (NAICS code 332000) and Plastics Product Manufacturing (NAICS code 236100), for the following occupations: automotive body and related repairers, first-line supervisors/managers of mechanics, installers, and repairers, and file clerks, engineering managers, environmental engineers, and clerical positions. These rates are fully loaded (adjusted by an overhead and profit rate). Hourly rates are as follows: technical at \$45.15, management at 58.48, and clerical at \$19.03. One hour of technical work requires 6 minutes of clerical and 3 minutes of managerial support.

^c One-time only costs.

^d Existing sources have to submit their first annual compliance report or notification of compliance status until March 1 of the 4th year after promulgation of this rule.

Table C1. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Paint Stripping Operations at Area Sources - Year 1

19 19 (G) (G) Foot Footnotes Non-Non-Labor		(A)		(B)	(C)	(D)	45 (E)	58 (F)	19 (G)			Footnotes
Burden Item		Respondent Hours Per Occurrence (Technical hours)	Non-Labor Costs Per Occurrence	Number of Occurrences Per Respondent Per Year	Hours Per Respondent Per Year (C=A x B)	Number of Respondents Per Year (a)	Technical Hours Per Year @ \$45.15 (CXD)	Management Hours Per Year @ \$58.48 (E x 0.05)	Clerical Hours Per Year @ \$19.03 (E x 0.1)	Total Labor Costs Per Year (b)	Total Non-Labor Costs Per Year	
1.	Applications	Not applicable										
2.	Surveys and Studies	Not applicable										
3.	Reporting Requirements											
A.	Read and Understand Rule Requirements	2	\$0	1	2	3,000	6,000.00	300.00	600.00	\$299,862	\$0	c
B.	Process/Review Information	2	\$0	1	2	3,000	6,000.00	300.00	600.00	\$299,862	\$0	
C.	Create Information											
	1) Initial Notification Letter	1	\$1	1	1	3,000	3,000.00	150.00	300.00	\$149,931	\$3,000	c, d
	2) Notification of Compliance Status	1	\$1	0	0	0	0.00	0.00	0.00	\$0	\$0	
	3) Annual compliance report	1	\$3	0	0	0	0.00	0.00	0.00	\$0	\$0	
4.	Recordkeeping Requirements											
A.	Read Instructions	Included in 3.A										
B.	Plan Activities	8	\$0	0	0	0	0	0	0	\$0	\$0	
C.	Implement Activities											
	1) Train personnel	8	\$0	0	0	0	0	0	0	\$0	\$0	
	2) Update Plan	2	\$0	0	0	0	0	0	0	\$0	\$0	
D.	Record information	1	\$0	0	0	0	0	0	0	\$0	\$0	
TOTAL:							15,000	750	1,500	\$749,655	\$3,000	
Summary of Respondent Burden						Total Hours	Labor	Non-Labor	Total			
Annualized Capital and Startup						17,250	\$749,655	\$3,000	\$752,655			
O & M Summary						0	\$0	\$0	\$0			
						0	0	0	0			

a Assumes that a total of 3,000 existing area source paint stripping facilities will exist in any given year of this ICR.

b Labor references an average of the Bureau of Labor Statistics rates in the Automotive Body, Paint, Interior, and Glass Repair Industry (NAICS code 811120), Fabricated Metal Product Manufacturing (NAICS code 332000) and Plastics Product Manufacturing (NAICS code 236100), for the following occupations: automotive body and related repairers, first-line supervisors/managers of mechanics, installers, and repairers, and file clerks, engineering managers, environmental engineers, and clerical positions. These rates are fully loaded (adjusted by an overhead and profit rate). Hourly rates are as follows: technical at \$45.15, management at \$58.48, and clerical at \$19.03. One hour of technical work requires 6 minutes of clerical and 3 minutes of managerial support.

c One-time only costs.

d The existing affected sources must submit their initial notification within one year from promulgation, which makes for a total of 3,000 sources submitting an initial notification within one year of promulgation of this rule.

Table C2. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Paint Stripping Operations at Area Sources - Year 2

19 19 (G) (G) Foot Footnotes Non Non-Labor	Burden Item	(A)	Non-Labor	(B)	(C)	(D)	45	58	19	Total Labor Costs Per Year (b)	Total Non-Labor Costs Per Year	Footnotes
		Respondent Hours Per Occurrence (Technical hours)	Costs Per Occurrence	Number of Occurrences Per Respondent Per Year	Hours Per Respondent Per Year (C=A x B)	Number of Respondents Per Year (a)	Technical Hours Per Year @\$45.15 (CXD)	Management Hours Per Year @\$58.48 (E x 0.05)	Clerical Hours Per Year @\$19.03 (E x 0.1)			
	1. Applications	Not applicable										
	2. Surveys and Studies	Not applicable										
	3. Reporting Requirements											
	A. Read and Understand Rule Requirements	2	\$0	0	0	0	0.00	0.00	0.00	\$0	\$0	
	B. Process/Review Information	2	\$0	0	0	0	0.00	0.00	0.00	\$0	\$0	
	C. Create Information											
	1) Initial Notification Letter	1	\$1	0	0	0	0.00	0.00	0.00	\$0	\$0	
	2) Notification of Compliance Status	1	\$1	0	0	0	0.00	0.00	0.00	\$0	\$0	
	3) Annual compliance report	1	\$3	0	0	0	0.00	0.00	0.00	\$0	\$0	
	4. Recordkeeping Requirements											
	A. Read Instructions	Included in 3.A										
	B. Plan Activities	8	\$0	1	8	1050	8,400	420	840	\$419,807	\$0	c, d
	C. Implement Activities											
	1) Train personnel	8	\$0	0	0	0	0	0	0	\$0	\$0	
	2) Update Plan	2	\$0	0	0	0	0	0	0	\$0	\$0	
	D. Record information	1	\$0	0	0	0	0	0	0	\$0	\$0	
	TOTAL:						8,400	420	840	\$419,807	\$0	
							Total Hours	Labor	Non-Labor	Total		
Summary of Respondent Burden							9,660	\$419,807	\$0	\$419,807		
Annualized Capital and Startup							0	\$0	\$0	\$0		
O & M Summary							0	0	0	0		

a Assumes that a total of 3,000 existing area source paint stripping facilities will exist in any given year of this ICR.

b Labor references an average of the Bureau of Labor Statistics rates in the Automotive Body, Paint, Interior, and Glass Repair Industry (NAICS code 811120), Fabricated Metal Product Manufacturing (NAICS code 332000) and Plastics Product Manufacturing (NAICS code 236100), for the following occupations: automotive body and related repairers, first-line supervisors/managers of mechanics, installers, and repairers, and file clerks, engineering managers, environmental engineers, and clerical positions. These rates are fully loaded (adjusted by an overhead and profit rate). Hourly rates are as follows: technical at \$45.15, management at \$58.48, and clerical at \$19.03. One hour of technical work requires 6 minutes of clerical and 3 minutes of managerial support.

c One-time only costs.

d Facilities that annually use more than 150 gallons of paint strippers that contain methylene chloride (estimated to be 1,050 facilities out of the 3,000 facilities) are required to develop a written plan. They are also required to submit a notification of compliance status report and annual compliance reports.

Table C3. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Paint Stripping Operations at Area Sources - Year 3

19 19 (G) (G) Foot Footnotes Non Non-Labor	Burden Item	(A)	Non-Labor	(B)	(C)	(D)	45	58	19	Total Labor Costs Per Year (b)	Total Non-Labor Costs Per Year	Footnotes	
		Respondent Hours Per Occurrence (Technical hours)	Costs Per Occurrence	Number of Occurrences Per Respondent Per Year	Hours Per Respondent Per Year (C=A x B)	Number of Respondents Per Year (a)	Technical Hours Per Year @\$45.15 (CXD)	Management Hours Per Year @\$58.48 (E x 0.05)	Clerical Hours Per Year @\$19.03 (E x 0.1)				
	1. Applications	Not applicable											
	2. Surveys and Studies	Not applicable											
	3. Reporting Requirements												
	A. Read and Understand Rule Requirements	2	\$0	0	0	0	0.00	0.00	0.00	\$0	\$0	c	
	B. Process/Review Information	2	\$0	0	0	0	0.00	0.00	0.00	\$0	\$0		
	C. Create Information												
	1) Initial Notification Letter	1	\$1	0	0	0	0.00	0.00	0.00	\$0	\$0	c	
	2) Notification of Compliance Status	1	\$1	1	1	1,050	1,050.00	52.50	105.00	\$52,476	\$1,050	c, d	
	3) Annual compliance report	1	\$3	0	0	0	0.00	0.00	0.00	\$0	\$0	e	
	4. Recordkeeping Requirements												
	A. Read Instructions	Included in 3.A											
	B. Plan Activities	8	\$0	0	0	0	0	0	0	\$0	\$0		
	C. Implement Activities												
	1) Train personnel	15	\$0	1	15	1050	15,750	100	200	\$309,219	\$0	f	
	2) Update Plan	2	\$0	0	0	0	0	0	0	\$0	\$0		
	D. Record information	1	\$0	0	0	0	0	0	0	\$0	\$0		
	TOTAL:						16,800	153	305	\$361,695	\$1,050		
							Total Hours	Labor	Non-Labor	Total			
							Summary of Respondent Burden	17,258	\$361,695	\$1,050	\$362,745		
							Annualized Capital and Startup	0	\$0	\$0	\$0		
							O & M Summary	0	0	0	0		

a Assumes that a total of 3,000 existing area source paint stripping facilities will exist in any given year of this ICR.

b Labor references an average of the Bureau of Labor Statistics rates in the Automotive Body, Paint, Interior, and Glass Repair Industry (NAICS code 811120), Fabricated Metal Product Manufacturing (NAICS code 332000) and Plastics Product Manufacturing (NAICS code 236100), for the following occupations: automotive body and related repairers, first-line supervisors/managers of mechanics, installers, and repairers, and file clerks, engineering managers, environmental engineers, and clerical positions. These rates are fully loaded (adjusted by an overhead and profit rate). Hourly rates are as follows: technical at \$45.15, management at \$58.48, and clerical at \$19.03. One hour of technical work requires 6 minutes of clerical and 3 minutes of managerial support.

c One-time only costs.

d Assumes sources that annually use more than 150 gallons of paint strippers that contain methylene chloride (estimated to be 1,050 facilities out of the 3,000 facilities) complete and submit their notification of compliance status at the end of this year.

e The 15 hrs training includes 2 technical hrs (at \$45/hr) and 13 laborer hrs (at \$15/hr) for an average labor rate of \$19/hr. The management and clerical hours are based on the technical hours only.

f Existing sources will not have to submit their first annual compliance report until March 1 of the 4th year after promulgation of this rule and are thus excluded from the initial 3-year ICR period.

Table C4. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of Paint Stripping Operations at Area Sources - Year 4

19 19 (G) (G) Foot Footnotes Non Non-Labor	Burden Item	(A)	Non-Labor	(B)	(C)	(D)	45	58	19	Total Labor Costs Per Year (b)	Total Non-Labor Costs Per Year	Footnotes	
		Respondent Hours Per Occurrence (Technical hours)	Costs Per Occurrence	Number of Occurrences Per Respondent Per Year	Hours Per Respondent Per Year (C=A x B)	Number of Respondents Per Year (a)	(E) Technical Hours Per Year @\$45.15 (CXD)	(F) Management Hours Per Year @\$58.48 (E x 0.05)	(G) Clerical Hours Per Year @\$19.03 (E x 0.1)				
	1. Applications	Not applicable											
	2. Surveys and Studies	Not applicable											
	3. Reporting Requirements												
	A. Read and Understand Rule Requirements	2	\$0	0	0	0	0.00	0.00	0.00	\$0	\$0		
	B. Process/Review Information	2	\$0	0	0	0	0.00	0.00	0.00	\$0	\$0		
	C. Create Information												
	1) Initial Notification Letter	1	\$1	0	0	0	0.00	0.00	0.00	\$0	\$0		
	2) Notification of Compliance Status	1	\$1	0	0	0	0.00	0.00	0.00	\$0	\$0		
	3) Annual compliance report	1	\$3	1	1	1,050	1,050.00	52.50	105.00	\$52,476	\$3,150	c	
	4. Recordkeeping Requirements												
	A. Read Instructions	Included in 3.A											
	B. Plan Activities	8	\$0	0	0	0	0	0	0	\$0	\$0		
	C. Implement Activities												
	1) Train personnel	8	\$0	0	0	0	0	0	0	\$0	\$0		
	2) Update Plan	2	\$0	1	2	1050	2,100	105	210	\$104,952	\$0	e	
	D. Record information	1	\$0	0	0	0	0	0	0	\$0	\$0		
	TOTAL:						3,150	158	315	\$157,428	\$3,150		
							Total Hours	Labor	Non-Labor	Total			
							Summary of Respondent Burden	3,623	\$157,428	\$3,150	\$160,578		
							Annualized Capital and Startup	0	\$0	\$0	\$0		
							O & M Summary	0	0	0	0		

a Assumes that a total of 3,000 existing area source paint stripping facilities will exist in any given year of this ICR.

b Labor references an average of the Bureau of Labor Statistics rates in the Automotive Body, Paint, Interior, and Glass Repair Industry (NAICS code 811120), Fabricated Metal Product Manufacturing (NAICS code 332000) and Plastics Product Manufacturing (NAICS code 236100), for the following occupations: automotive body and related repairers, first-line supervisors/managers of mechanics, installers, and repairers, and file clerks, engineering managers, environmental engineers, and clerical positions. These rates are fully loaded (adjusted by an overhead and profit rate). Hourly rates are as follows: technical at \$45.15, management at \$58.48, and clerical at \$19.03. One hour of technical work requires 6 minutes of clerical and 3 minutes of managerial support.

c One-time only costs.

d Assumes existing sources that annually use more than 150 gallons of paint strippers that contain methylene chloride (estimated to be 1,050 facilities out of the 3,000 facilities) will submit their first annual compliance report by March 1 of the 4th year after promulgation of this rule.

e Facilities will update the work practice plan and placards displaying this plan.

Table D1. Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources - Year 1

Cost Burden Item	(A) Number of Occurrences Per Year		(B) EPA Hours Per Occurrence (Tech Hours)	33 (C) Tech Hours Per Year @\$33 (C=Ax33)	72 (D) Management Hours Per Year @\$72 (D=Cx0.05)	25 (E) Clerical Hours Per Year @\$25 (E=Cx0.1)	(F) EPA Cost Per Year (a)
		b, c					
1. Applications	not applicable						0
2. Read and Understand Rule Requirements	60	b, c	40	2400	120	240	\$182,760
3. Required Activities	not applicable						
A. Observe initial performance tests	not applicable						
B. Observe annual performance tests	not applicable						
C. Excess emissions -- Enforcement Activities	not applicable						
D. Create Information	not applicable						
E. Gather Information	not applicable						
F. Report Reviews							
1) Initial Notification	38,981	c	0.5	19,491	975	1,949	\$1,484,202
2) Notification of Compliance Status	3,236	c	0.5	1,618	81	162	\$123,211
3) Review annual compliance report	0		0.5	0	0	0	\$0
4. Travel expenses:	not applicable						
TOTAL:				23,509	1,175	2,351	\$1,790,172

Total Hours	Labor	Non-Labor	Total
27,035	\$1,790,172	\$0	\$1,790,172

a Figures may not add exactly due to rounding.

Assume that each State and EPA Region reviews the MSCAS rule to develop a plan for reviewing notifications and reports. 1 occurrence per State * 50 States + 1 occurrence per EPA Region * 10 Regions =

b 60 occurrences.

c One-time only costs.

Table D2. Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources - Year 2

Cost Burden Item	(A) Number of Occurrences Per Year		(B) EPA Hours Per Occurrence (Tech Hours)	33 (C) Tech Hours Per Year @\$33 (C=AxB)	72 (D) Management Hours Per Year @\$72 (D=Cx0.05)	25 (E) Clerical Hours Per Year @\$25 (E=Cx0.1)	(F) EPA Cost Per Year (a)
		b, c					
1. Applications	not applicable						0
2. Read and Understand Rule Requirements	0	b, c	40	0	0	0	\$0
3. Required Activities	not applicable						
A. Observe initial performance tests	not applicable						
B. Observe annual performance tests	not applicable						
C. Excess emissions -- Enforcement Activities	not applicable						
D. Create Information	not applicable						
E. Gather Information	not applicable						
F. Report Reviews							
1) Initial Notification	1,618	c	0.5	809	40	81	\$31,632
2) Notification of Compliance Status	1,618	c	0.5	809	40	81	\$31,632
3) Review annual compliance report	3,236		0.5	1,618	81	162	\$63,264
4. Travel expenses:	not applicable						
TOTAL:				3,236	162	324	\$126,528

Total Hours	Labor	Non-Labor	Total
3,721	\$126,528	\$0	\$126,528

a Figures may not add exactly due to rounding.

b Review of the rule by EPA Regions and States only occurs in year 1 of this ICR

c One-time only costs.

Table D3. Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources - Year 3

Cost Burden Item	(A) Number of Occurrences Per Year		(B) EPA Hours Per Occurrence (Tech Hours)	33 (C) Tech Hours Per Year @\$33 (C=AxB)	72 (D) Management Hours Per Year @\$72 (D=Cx0.05)	25 (E) Clerical Hours Per Year @\$25 (E=Cx0.1)	(F) EPA Cost Per Year (a)
		b, c					
1. Applications	not applicable						0
2. Read and Understand Rule Requirements	0	b, c	40	0	0	0	\$0
3. Required Activities	not applicable						
A. Observe initial performance tests	not applicable						
B. Observe annual performance tests	not applicable						
C. Excess emissions -- Enforcement Activities	not applicable						
D. Create Information	not applicable						
E. Gather Information	not applicable						
F. Report Reviews							
1) Initial Notification	1,618	c	0.5	809	40	81	\$31,632
2) Notification of Compliance Status	2,668	c	0.5	1,334	67	133	\$52,159
3) Review annual compliance report	4,854		0.5	2,427	121	243	\$94,896
4. Travel expenses:	not applicable						
TOTAL:				4,570	229	457	\$178,687

Total Hours	Labor	Non-Labor	Total
5,256	\$178,687	\$0	\$178,687

a Figures may not add exactly due to rounding.

b Review of the rule by EPA Regions and States only occurs in year 1 of this ICR

c One-time only costs.

Table D4. Annual Designated Administrator Burden and Cost of Recordkeeping and Reporting Requirements of Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources - Year 4

Cost Burden Item	(A) Number of Occurrences Per Year		(B) EPA Hours Per Occurrence (Tech Hours)	(C) Tech Hours Per Year @\$33 (C=AxB)	(D) Management Hours Per Year @\$72 (D=Cx0.05)	(E) Clerical Hours Per Year @\$25 (E=Cx0.1)	(F) EPA Cost Per Year (a)
		b, c					
1. Applications	not applicable						0
2. Read and Understand Rule Requirements	0	b, c	40	0	0	0	\$0
3. Required Activities	not applicable						
A. Observe initial performance tests	not applicable						
B. Observe annual performance tests	not applicable						
C. Excess emissions -- Enforcement Activities	not applicable						
D. Create Information	not applicable						
E. Gather Information	not applicable						
F. Report Reviews							
1) Initial Notification	1,618	c	0.5	809	40	81	\$31,632
2) Notification of Compliance Status	29,509	c	0.5	14,755	738	1,475	\$576,901
3) Review annual compliance report	37,031		0.5	18,516	926	1,852	\$723,956
4. Travel expenses:	not applicable						
TOTAL:				34,079	1,704	3,408	\$1,332,489
				Total Hours	Labor	Non-Labor	Total
				39,191	\$1,332,489	\$0	\$1,332,489

a Figures may not add exactly due to rounding.

b Review of the rule by EPA Regions and States only occurs in year 1 of this ICR

c One-time only costs.

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

	Sector	Commercial Misc. Surface Coating	Government Misc. Surface Coating	Paint Stripping	Total
Year 1	Burden Hours	#VALUE!	4,175	17,250	#VALUE!
	Labor Cost	#VALUE!	\$ 174,920	\$ 749,655	#VALUE!
	O&M cost	\$ 38,967	\$ 250	\$ 3,000	\$ 42,217
Year 2	Burden Hours	#VALUE!	-	9,660	#VALUE!
	Labor Cost	#VALUE!	\$ -	\$ 419,807	#VALUE!
	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	#VALUE!	1,392	14,723	#VALUE!
	Labor Cost	#VALUE!	\$ 58,307	\$ 510,386	#VALUE!
	O&M cost	\$ 23,236	\$ 83	\$ 1,350	\$ 24,670

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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	\$ -

12,004
\$ 698,462