

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Paint Stripping and Miscellaneous Surface Coating at Area Sources (40 CFR Part 63, Subpart HHHHHH)

1. Identification of the Information Collection

1(a) Title of the Information Collection

National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR Part 63, Subpart HHHHHH) (Renewal), EPA ICR Number 2268.03, OMB Control Number 2060-0607

1(b) Short Characterization/Abstract

The final rule of 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) was promulgated in 2008. These standards are part of the EPA Integrated Urban Strategy to reduce cancer risk from area sources under section 112(k)(3)(C) of the Clean Air Act (CAA). The affected sources must comply with recordkeeping and reporting requirements of the new rule.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Over the next three years, an average of 39,812 respondents per year will be subject to the standard. It is estimated that an average of 1,593 new commercially-owned motor vehicle and mobile equipment refinishing sources and 25 new miscellaneous surface coating sources will startup each year over the next three years to replace existing sources that terminate operations.

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.

The active (previous) Information Collection Request (ICR) had the following Terms of Clearance (TOC):

As part of its submission, EPA should verify that the wage rates referenced in section 6(b) of the supporting statement have been updated to current values and properly loaded to include overhead, consistent with current EPA and OMB guidelines.

This ICR uses 2010 labor rates, properly loaded to include overhead and consistent with current EPA and Office of Management and Budget (OMB) guidelines, to estimate the cost burden to the industry and Agency.

The burden to the “Affected Public” may be found below in Table 1: Summary of Annual Respondent Burden and Cost – NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40CFR Part63, Subpart HHHHHH) (Renewal). The burden to the “Federal government” is attributed entirely to work performed by federal employees or government contractors; this burden may be found below in Table 2: Average Annual EPA Burden – NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40CFR Part63, Subpart HHHHHH) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, hazardous air pollutants (HAP) emissions from paint

stripping and miscellaneous surface coating operations at area sources cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart HHHHHH.

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 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. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart HHHHHH.

3(a) Non-duplication

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 notice or report submitted to the State or local agency can be sent to the Administrator in lieu of the notice or 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. This consolidation removed any duplicate rule requirements; therefore, no duplication exists.

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

An announcement of a public comment period for the renewal of this ICR was published

in the Federal Register (75 FR 30812) on June 2, 2010. No comments were received on the burden published in the Federal Register.

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.

During this renewal, Ms. Heather Stiner (412) 281-2331 of the Society for Protective Coatings (SSPC), provided comments on the burden associated with this ICR. Comments included a suggestion for EPA to reduce burden on affected entities by creating forms for completing notifications and annual reports. Other comments involved applicability determinations, suggestions on rule revisions, and the rule's impact on small, privately owned painting operations. EPA reviewed the comments provided and noted that several reporting forms are already available at EPA's website, <http://www.epa.gov/ttn/atw/area/arearules.html#current>. Additionally, EPA has evaluated the impact on small business during the development of this rule.

In addition, the public also had 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

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

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

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC 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 final 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.

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.
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.

Category	NAICS	Examples of Potentially Regulated Entities
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	Tractors, earth moving machinery.
Job Shops	332722 332813 332991 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	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.

Category	NAICS	Examples of Potentially Regulated Entities
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

In this ICR, all the data that is recorded or reported is required by NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR part 63, subpart HHHHHH) (Renewal).

A source must make the following reports:

Notifications	
Initial notification letter	63.11175(a)
Notification of compliance status ^a	63.11175(b)
Annual notification of changes reports ^a	63.11176(a)

Assumptions:

^a These notifications/reports/records are not required of paint stripping facilities using one ton or less of methylene chloride (MeCl) for paint stripping per year.

A source must keep the following records:

Recordkeeping	
Records of painter certification	63.11177(a)
Records of filter efficiency ^b	63.11177(b)
Records of spray gun efficiency ^c	63.11177(c)
Records of notifications and annual reports ^a	63.11177(d)
Records of annual usage of methylene chloride (MeCl) in paint strippers ^d	63.11177(e)
Records of current methylene chloride minimization	63.11177(f)
Records of deviations from compliance ¹	63.11177(g)

Assumptions:

^a These notifications/reports/records are not required of paint stripping facilities using one ton or less of methylene chloride (MeCl) for paint stripping per year.

^b 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.

^c These records are only required for sources without an high volume lowpressure (HVLP) that opt to test non-HVLP type spray guns.

^d These records are only required of sources with paint stripping operations that have an annual usage of more than one ton of MeCl.

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read and understand rule requirements
Plan and implement required activities
Create initial notification letter, notification of compliance status and annual compliance report
Record required information, including painter certification, filter efficiency, spray gun, and deviation from the rule requirements and corrective actions taken
Train personnel to be able to respond to a collection of information.
Audit information

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

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

Agency Activities
Read and understand rule requirements
Observe initial and annual performance tests
Perform enforcement activities
Create and gather information
Review reports of initial notifications, notification of compliance status, and annual compliance reports

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.

The records required by this regulation must be retained by the owner/operator for five years.

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 of the existing sources, 93.5 percent (37,223 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 final rule. New sources are required to submit their initial notification and notification of compliance within 180 days after their initial start-up. Existing sources have two years from the date the rule is promulgated to submit the initial notification, and have three years and 60 days after the rule is promulgated to submit the notification of compliance, if required. These two notifications are one-time-only burdens. Notifications of compliance and annual compliance reports are not required from paint stripping facilities with annual usage of 1 ton or less of MeCl in paint stripping operations.

New and existing sources must also submit an annual report for each calendar year by March 1 of the following year if there are any changes in the information contained in the initial notification since the initial notification or a previous report of changes, 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 surface coating operations must maintain additional records of painter certification dates and refresher training dates, spray booth filter efficiency, and spray gun efficiency provided by the manufacturers. Owners of an affected paint stripping operation must maintain additional records of annual MeCl usage in paint stripping operations. Owners of affected paint stripping operations that use more than one ton of MeCl in paint strippers, 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 surface coating operations are summarized below in Table 1a (commercial entities) and Table 1b (government-owned entities). Since the respondent activities are slightly different, the requirements for affected paint stripping operations are summarized in Table 1c.

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The 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(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 124,527 (Total Labor Hours from Table 1). The recordkeeping hours shown below in Tables 1a through 1c are 23,766. The reporting requirement hours shown below in Tables 1a through 1c are 100,761. These hours are based on Agency studies and background documents from the development of the regulation, Agency

knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$116.05 (\$55.26 + 110%)
Technical	\$97.21 (\$46.29 + 110%)
Clerical	\$48.87 (\$23.27 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2010, Table 2. Civilian Workers, by Occupational and Industry group. The rates are from column 1, Total Compensation. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance 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.

The only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs and operation and maintenance costs. There are no capital/startup costs.

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

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

Operation and Maintenance (O&M) Costs					
Source	Burden Item	(A) Annual O&M Costs per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Average Number of Respondents with O&M	(D) Total O&M, (A× B×C)
Commercial Miscellaneous Surface Coating Operations (Total \$138,070)	Initial Notification Letter	\$1	1	1,618	\$1,618
	Notification of Compliance Status	\$1	1	29,259	\$29,259
	Annual Compliance Report	\$3	1	35,731	\$107,193

Operation and Maintenance (O&M) Costs					
Source	Burden Item	(A) Annual O&M Costs per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Average Number of Respondents with O&M	(D) Total O&M, (A× B×C)
Government-owned Miscellaneous Surface Coating Operations (Total \$1,000)	Notification of Compliance Status	\$1	1	250	\$250
	Annual Compliance Report	\$3	1	250	\$750
Paint Stripping Operations (Total \$3,150)	Annual Compliance Report	\$3	1	1,050	\$3,150
TOTAL					\$142,220

There are no capital/startup costs associated with this ICR.

The total operation and maintenance (O&M) costs for this ICR are \$142,220. This is the total of column D and is the average annual cost to industry over the next three years of the ICR.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA compliance and enforcement program includes activities such as, the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$1,064,942.

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

Managerial	\$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2010 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden – NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR63, subpart HHHHHH) (Renewal).

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

Based on our research during the development of this ICR, on average over the first three years, approximately 39,812 existing respondents will be subject to the standard. This number is expected to remain constant over the period of this ICR. However, it is estimated that an average

of 1,593 new commercially-owned motor vehicle and mobile equipment refinishing sources and 25 new miscellaneous surface coating sources will startup each year over the next three years to replace existing sources which may terminate operations. No new state or local government-owned mobile equipment refinishing shops are expected to startup during this ICR period.

The number of respondents is calculated using the following table.

Category	Number of Existing Sources in Year 1	New Sources per Year from Year 1-6 of ICR
Miscellaneous Surface Coating	831	25
Commercial Motor Vehicle and Mobile Equipment Refinishing	35,731	1,593
Government Motor Vehicle and Mobile Equipment Refinishing	250	0
Paint Stripping	3,000	0
TOTALS	39,812	1,618

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

Total Annual Responses						
Category	(A) Annual Number of New Respondents	(B) Number of Reports for New Respondents	(C) Number of Existing Respondents	(D) ^a Number of Reports for Existing Respondents	(F) Number of Existing Respondents That Keep Records but Do Not Submit Reports	(E) Total Annual Responses $E=(A \times B) + (C \times D)$
Miscellaneous Surface Coating	25	3	831	1	0	906
Commercial Motor Vehicle and Mobile Equipment Refinishing	1,593	3	35,731	1	0	40,510
Government Motor Vehicle and Mobile Equipment Refinishing	0	3	250	1	0	250
Paint Stripping	0	3	1,050	1	1,950	1,050
TOTAL	1,618		37,862			42,716

Assumptions:

^a Responses for existing sources are the annual compliance reports.

The number of Total Annual Responses is 42,716. These responses include initial notifications, notifications of compliance status, and annual compliance reports. They do not count recordkeeping activities as a response.

The total annual labor costs are \$11,280,974. Details regarding these estimates may be

found below in Table 1: Summary of Annual Respondent Burden and Cost – NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR63, Subpart HHHHHH) (Renewal).

The total annual capital/startup and O&M costs to the regulated entities are \$142,220. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The average annual Agency burden and cost over next three years is estimated to be 23,631 labor hours at a cost of \$1,064,942. See below Table 2: Annual Agency Burden and Cost – NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR63, Subpart HHHHHH) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2 (below), respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 124,527. Details regarding these estimates may be found below in Table 1: Summary of Annual Respondent Burden and Cost – NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR63, Subpart HHHHHH) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 3 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$142,220. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 23,631 hours at a cost of \$1,064,942, see below Table 2: Annual Agency Burden and Cost – NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR63, Subpart HHHHHH) (Renewal). **6(f) Reasons for Change in Burden**

There is a net decrease in labor hours and a net increase in cost to the Respondents in this ICR compared to the previous ICR. A decrease in hour burden to respondents occurs because the burden estimates for the previous ICR were based on requirements applicable during the first three years after promulgation of the final rule. The burden presented in this ICR is based on estimates of burden to industry after the initial three-year period. This ICR uses the most recent labor rates to estimate the cost burden to the industry, which reflect a higher cost per hour.

There is an increase in O&M cost to the Respondents in this ICR compared to the previous ICR. The increase is due to updates in the O&M estimates using information that

applies after the first three-year period of the regulation.

There is an increase in the total number of responses in this ICR compared to the previous ICR. This increase occurs because the estimate of total number of responses for the previous ICR was based on requirements applicable during the first three years after promulgation of the final rule. Additionally, new sources each year become subject to recordkeeping and reporting requirements. The estimate of total number of responses presented in this ICR is based on burden to industry after the initial three-year period.

There is an increase in both labor hours and cost to the Agency in this ICR compared to the previous ICR. An increase in hour burden to the Agency occurs because the burden estimates for the previous ICR were based on requirements applicable during the first three years after promulgation. The burden presented in this ICR is based on estimates of burden to the Agency after the initial three-year period. Additionally, this ICR uses the most recent labor rates to estimate the cost burden to the Agency, which reflect a higher cost per hour.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 3 hours per response. 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 valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2010-0351. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the 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 in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 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 docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2010-0351 and OMB Control Number 2060-0607 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Summary of Annual Respondent Burden and Cost – NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR63, Subpart HHHHHH) (Renewal)

Sector	Commercial Misc. Surface Coating	Government Misc. Surface Coating	Paint Stripping	Total
Burden Hours	120,315	589	3,623	124,527
Labor Cost	\$10,885,792	\$55,299	\$339,883	\$11,280,974

Table 1a: Annual Respondent Burden and Cost – Commercial Miscellaneous Surface Coating Operations at Area Sources

Burden Item	(A) Respondent Hours Per Occurrence (Technical hours)	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A×B)	(D) Number of Respondents Per Year ^a	(E) Technical Hours Per Year @ \$97.21 (C×D)	(F) Management Hours Per Year @ \$116.05 (E×0.05)	(G) Clerical Hours Per Year @ \$48.87 (E×0.1)	Total Labor Costs Per Year ^b
1. Applications	Not applicable							
2. Surveys and Studies	Not applicable							
3. Reporting Requirements								
A. Read and Understand Rule Requirements	5	1	5	1,618	8,090	405	809	\$872,907
B. Required Activities	not applicable							
C. Create Information					0	0	0	
1) Initial Notification Letter	1	1	1	1,618	1,618	81	162	\$174,581
2) Notification of Compliance Status	2	1	2	1,618	3,236	162	324	\$349,163
3) Annual compliance report	2	1	2	36,562	73,124	3,656	7,312	\$7,890,043
<i>Subtotal Reporting</i>						98,978		\$9,286,694
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	1	8	1,618	12,944	647	1,294	\$1,396,651
E. Record information					0	0	0	
1) Records of painter certification	0.25	2.4	0.6	7,156	Not Applicable	Not Applicable	4,294	
2) Records of filter efficiency	0.25	1	0.25	357	89	4	9	\$9,630
3) Records of spray gun	1.5	1	1.5	0	0	0	0	\$0

Burden Item	(A) Respondent Hours Per Occurrence (Technical hours)	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A×B)	(D) Number of Respondents Per Year ^a	(E) Technical Hours Per Year @\$97.21 (C×D)	(F) Management Hours Per Year @\$116.05 (E×0.05)	(G) Clerical Hours Per Year @\$48.87 (E×0.1)	Total Labor Costs Per Year ^b
A. Read Instructions	Included in 3.A							
B. Plan Activities	not applicable							
C. Implement Activities	not applicable							
D. Develop Record System	8	1	8	0	0	0	0	\$0
E. Record information								
1) Records of painter certification	0.25	2.4	0.6	0	Not Applicable	Not Applicable	0	
2) Records of filter efficiency	0.25	1	0.25	0	0.00	0.00	0.00	\$0
3) Records of spray gun	1.5	1	1.5	0	0.00	0.00	0.00	\$0
4) Records of deviation from the rule requirements and corrective actions taken	1	1	1	13	12.50	0.63	1.25	\$1,349
F. Personnel Training	Not applicable							
G. Time for audits	Not applicable							
Subtotal Recordkeeping						14		\$1,349
TOTAL						589		\$55,298

Assumptions:

^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, submit the initial notification, develop a record system, and enter data on painter certifications.

^b Costs are based on March 2010 Bureau of Labor Statistics, Employment Cost Trends total compensation index which includes wages, salaries, and benefits. Costs are estimated using the following hourly rates: technical at \$97.21, management at \$116.05 and clerical at \$48.87.

Table 1c. Annual Respondent Burden and Cost – Paint Stripping Operations at Area Sources

Burden Item	(A) Respondent Hours Per Occurrence (Technical hours)	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A×B)	(D) Number of Respondents Per Year ^a	(E) Technical Hours Per Year @\$97.21 (C×D)	(F) Management Hours Per Year @\$116.05 (E×0.05)	(G) Clerical Hours Per Year @\$48.87 (E×0.1)	Total Labor Costs Per Year ^b
1. Applications	Not applicable							

Burden Item	(A) Respondent Hours Per Occurrence (Technical hours)	(B) Number of Occurrences Per Respondent Per Year	(C) Hours Per Respondent Per Year (C=A×B)	(D) Number of Respondents Per Year ^a	(E) Technical Hours Per Year @\$97.21 (C×D)	(F) Management Hours Per Year @\$116.05 (E×0.05)	(G) Clerical Hours Per Year @\$48.87 (E×0.1)	Total Labor Costs Per Year ^b
2. Surveys and Studies	Not applicable							
3. Reporting Requirements								
A. Read and Understand Rule Requirements	2	0	0	0	0.00	0.00	0.00	\$0
B. Process/Review Information	2	0	0	0	0.00	0.00	0.00	\$0
C. Create Information								
1) Initial Notification Letter	1	0	0	0	0.00	0.00	0.00	\$0
2) Notification of Compliance Status	1	0	0	0	0.00	0.00	0.00	\$0
3) Annual compliance report	1	1	1	1,050	1,050.00	52.50	105.00	\$113,294
<i>Subtotal Reporting</i>						1,208		\$113,294
4. Recordkeeping Requirements								
A. Read Instructions	Included in 3.A							
B. Plan Activities	8	0	0	0	0	0	0	\$0
C. Implement Activities								
1) Train personnel	8	0	0	0	0	0	0	\$0
2) Update Plan	2	1	2	1,050	2,100	105	210	\$226,589
D. Record information	1	0	0	1,050	0	0	0	\$0
<i>Subtotal Recordkeeping</i>						2,415		\$226,589
TOTAL						3,623		\$339,883

Assumptions:

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

^b Costs are based on March 2010 Bureau of Labor Statistics, Employment Cost Trends total compensation index which includes wages, salaries, and benefits. Costs are estimated using the following hourly rates: technical at \$97.21, management at \$116.05 and clerical at \$48.87.

Table 2: Average Annual EPA Burden – NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR63, Subpart HHHHHH) (Renewal)

Burden Item	(A) Number of Occurrences Per Year	(B) EPA Hours Per Occurrence (Tech Hours)	(C) Tech Hours Per Year @\$46.21 (C=A×B)	(D) Management Hours Per Year @\$62.27 (D=C×0.05)	(E) Clerical Hours Per Year @\$25.01 (E=C×0.1)	(F) EPA Cost Per Year ^a
1. Applications	not applicable					0
2. Required Activities	not applicable					
A. Create Information	not applicable					
B. Gather Information	not applicable					
C. Report Reviews						
1) Initial Notification	1,618	0.5	809	40	81	\$41,926
2) Notification of Compliance Status	1,618	0.5	809	40	81	\$41,926
3) Review annual compliance report	37,862	0.5	18,931	947	1,893	\$981,090
TOTAL				23,631		\$1,064,942

Assumptions:

^a Costs for notifications are based on Office of Personnel Management General Schedule. Costs are estimated using the following rates: technical at \$46.21, management at \$62.27, and clerical at \$25.01.