

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

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

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Paint Stripping and Miscellaneous Surface Coating at Area Sources (40 CFR Part 63, Subpart HHHHHH) (Renewal), EPA ICR Number 2268.05, OMB Control Number 2060-0607.

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating at Area Sources (40 CFR Part 63, Subpart HHHHHH) were proposed on September 9, 2007, and promulgated on January 9, 2008. These regulations 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). These standards apply to existing and new sources that conduct paint stripping operations using methylene chloride (MeCl) -containing paint strippers, motor vehicle and mobile equipment surface coating operations, and miscellaneous surface coating operations located at area sources. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart HHHHHH.

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.

The “Affected Public” are owners or operators of paint stripping and miscellaneous surface coating operations at area sources. A summary of 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 at Area Sources (40 CFR Part 63, Subpart HHHHHH) (Renewal). Further, Tables 1a, 1b, and 1c break out separately the respondents’ burden for commercial miscellaneous surface coating operations, government-owned miscellaneous surface coating operations, and paint stripping operations, respectively. The ‘burden’ to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Paint Stripping and Miscellaneous Surface Coating at Area Sources (40 CFR Part 63, Subpart HHHHHH) (Renewal).

Any owner/operator subject to the provisions of this part shall maintain a file containing

these documents and retain this file for at least five years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

Over the next three years, approximately 37,862 existing respondents per year will be subject to these standards. 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 results in a total of 39,812 affected sources subject to this rule each year.

## **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 (HAPs) emissions from description of regulated sources either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/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**

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

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.

There are no quarterly or semiannual requirements as there are with most regulated large industries. 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 its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

#### **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* (82 FR 29552) on June 29, 2017. No comments were received on the burden published in the *Federal Register* for this renewal.

#### **3(c) Consultations**

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is

EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, EPA contacted the following entities: American Coatings Association, at (202) 462-6272; the American Composites Manufacturers Association (ACMA), at (703) 525-0511; and the Society for Protective Coatings, at (877) 281-7772.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

### **3(d) Effects of Less-Frequent Collection**

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these 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. These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to these standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

### **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 these standards do not include sensitive questions.

## 4. The Respondents and the Information Requested

### 4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of paint stripping and miscellaneous surface coating operations at area sources. The United States Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) codes are presented in the following table:

<b>Standard (40 CFR Part 63, Subpart HHHHHH)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
<i>Paint Stripping</i>		
Natural Gas Liquid Extraction	1321	211112
Spices and Extracts	2082	311942
Mobile Homes	2451	321991
Basic Chemical Manufacturing	2813 2816 2819 2865 2869	325110 325120 325131 325188 325192 325193 325199
Plastics Material Synthetic Resins, and Nonvulcanizable Elastomers	2821	325211
Paint and Coating Manufacturing	2851	325510
Miscellaneous Chemical Production and Preparation	2819	325998
Alumina Refining	2819	331311
All Other Plastics Products	3089	326199
All Other Miscellaneous Manufacturing	2499	339999

<b>Standard (40 CFR Part 63, Subpart HHHHHH)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Waste Treatment and Disposal	4953	562211 562212 562213 562219
Materials Recovery	4953	562920
Re-upholstery and Furniture Repair	4581	811420
<i>Miscellaneous Surface Coating</i>		
Aerospace Equipment	3728 3761 3764	336413 336414 336415 54171
Automobile Parts	3292 3429 3465 3621 3711 3714	335312 336111 336211 336312 336320 336330 336340 336370 336399
Extruded Aluminum	3354 3365 3442 3446	331316 331524 332321 332323
Heavy Equipment	3511 3531	333120 333611
Job Shops	2499 3399 3429 3562 3577 3728	332722 332813 332991 334119 336413 339999

<b>Standard (40 CFR Part 63, Subpart HHHHHH)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Large Trucks and Buses	3711	336120 336211
Metal Buildings	3448	332311
Metal Containers	2655 3325 3443	322214 331513 332420 811310
Metal Pipe and Foundry	3312 3317 3321 3325	331111 331210 331221 331511 331513
Rail Transportation	3531 3731 4011	336510 336611 482111
Recreational Vehicles	3354 3429 3711 3716 3751 3792	331316 336112 336211 336213 336214 336399 3369 336991
Rubber-to- Metal Products	3061 3069	326291 326299
Structural Steel	3441 3448	332311 332312
Other	3715	336212

<b>Standard (40 CFR Part 63, Subpart HHHHHH)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Transportation Equipment	3292 3716 3792 3799	336213 336214 336350 336999 56121 56211 8111
Other industrial and commercial	2522	337214
Miscellaneous Plastic Parts	3086 3089	326140 326150 326199
Office Equipment	3578	333313
Electronics	3663	334220
Medical Equipment	2599 3829	339111 339112
Sporting Equipment	3069	339920
Signs	3993	339950
Marine Equipment	3732 4493	336612 713930
<i>Motor Vehicle and Mobile Equipment Refinishing</i>		
Commercial	5511 5521 7532	441110 441120 811121
Government	Not applicable	Not applicable

#### **4(b) Information Requested**

##### **(i) Data Items**

In this ICR, all the data that is recorded or reported is required by the NESHAP for Paint



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

A source must make the following reports:

<b>Notifications</b>	
Initial notification letter	§ 63.11175(a)
Notification of compliance status	§ 63.11175(b)

<b>Reports</b>	
Annual notification of changes reports <sup>a</sup>	§ 63.11176(a)
Minimization plan report (for sources with more than one ton of MeCl)	§ 63.11176(b)

<sup>a</sup> This notification is not required of paint stripping facilities using one ton or less of methylene chloride per year.

A source must keep the following records:

<b>Recordkeeping</b>	
Records of painter training certification <sup>a</sup>	§ 63.11177(a)
Records of spray booth efficiency <sup>b</sup>	§ 63.11177(b)
Documentation of acceptable alternatives to spray equipment <sup>c</sup>	§ 63.11177(c)
Records of notifications and reports <sup>d</sup>	§ 63.11177(d)
Records of paint strippers containing MeCl used for paint stripping operations	§ 63.11177(e)
Current methylene chloride minimization	§ 63.11177(f)
Deviations from compliance	§ 63.11177(g)
Source compliance assessments performed in support of the initial notification, notification of compliance status, or annual notification of changes report	§ 63.11177(h)

<sup>a</sup> These records are required only 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 recordkeeping (i.e., maintaining a file of the filter efficiency, as reported by the manufacturer).

<sup>b</sup> These records only are required of sources that do not use high-volume, low-pressure (HVLP) spray guns,

electrostatic applications, airless spray guns, or air assisted airless spray guns, and that instead opt to conduct testing to verify a transfer efficiency equivalency to that of an HVLP spray gun.

<sup>c</sup> Records of notifications of changes to reports are not required of paint stripping facilities using one ton or less of methylene chloride per year.

<sup>d</sup> These records only are required of sources with paint stripping operations that have an annual usage of more than one ton of methylene chloride.

### 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.

#### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with regulatory requirements.
Plan and implement required activities.
Create initial notification letter, notification of compliance status, and annual compliance report.
Enter information required to be recorded above, 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.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Audit the information.
Transmit or otherwise disclose the 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:

<b>Agency Activities</b>
Review initial letters, notifications of compliance status, and annual reports.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

### **5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

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 (37,224 sources) are estimated to be small businesses.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown below in the following tables: Table 1: Summary of Annual Respondent Burden and Cost – NESHAP for Paint Stripping and Miscellaneous Surface Coating at Area Sources (40 CFR Part

63, Subpart HHHHHH) (Renewal), Table 1a: Annual Respondent Burden and Cost - Commercial Motor Vehicle and Mobile Equipment Refinishing and Miscellaneous Surface Coating Operations at Area Sources, Table 1b: Annual Respondent Burden and Cost - Government-owned Miscellaneous Surface Coating Operations at Area Sources, and Table 1c: Annual Respondent Burden and Cost – Paint Stripping Operations at Area Sources.

## **6. Estimating the Burden and Cost of the Collection**

Tables 1a through 1c document 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 neither conduct nor 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 169,000 hours (Total Labor Hours from Table 1 below). 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	\$149.35 (\$71.12 + 110%)
Technical	\$112.98 (\$53.80 + 110%)
Clerical	\$54.81 (\$26.10 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, “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**

The type of industry costs associated with the information collection activities in the subject standards are both labor costs which are addressed elsewhere in this ICR and annual operation and maintenance (O&M) costs associated with photocopying and postage. There are no capital/startup costs.

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

Sources will incur O&M costs for photocopying and mailing notifications and reports. The burden estimate for this ICR includes a one-time cost of one dollar for mailing and photocopying each initial notification and notification of compliance and three dollars for mailing and photocopying each annual report.

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Burden Item	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
<b><i>Miscellaneous Surface Coating</i></b>						
Initial Notification Letter	\$0	25	\$0	\$1	25	\$25
Notification of Compliance Status	\$0	25	\$0	\$1	25	\$25
Annual Compliance Report	\$0	25	\$0	\$3	831	\$2,493
<i>Subtotal</i>			\$0			\$2,543
<b><i>Commercial Motor Vehicle and Mobile Equipment Refinishing</i></b>						
Initial Notification Letter	\$0	1,593	\$0	\$1	1,593	\$1,593
Notification of Compliance Status	\$0	1,593	\$0	\$1	1,593	\$1,593
Annual Compliance Report	\$0	1,593	\$0	\$3	35,731	\$107,193
<i>Subtotal</i>			\$0			\$110,379
<b><i>Government Motor Vehicle and Mobile Equipment Refinishing</i></b>						
Annual Compliance Report	\$0	0	\$0	\$3	250	\$750
<i>Subtotal</i>			\$0			\$750
<b><i>Paint Stripping</i></b>						
Annual Compliance Report	\$0	0	\$0	\$3	1,050	\$3,150
<i>Subtotal</i>			\$0			\$3,150
<b>TOTAL</b>			<b>\$0</b>			<b>\$117,000</b>

Note: Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$117,000. This is the

total of column G. The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$117,000. These are recordkeeping costs.

### **6(c) Estimating Agency Burden and Cost**

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall 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 \$1,110,000.

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

Managerial	\$64.80 (GS-13, Step 5, \$40.50 + 60%)
Technical	\$48.08 (GS-12, Step 1, \$30.05 + 60%)
Clerical	\$26.02 (GS-6, Step 3, \$16.26 + 60%)

These rates are from the Office of Personnel Management (OPM), 2017 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Paint Stripping and Miscellaneous Surface Coating at Area Sources (40 CFR Part 63, Subpart HHHHHH) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 39,812 existing respondents will be subject to these standards. 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. The overall average number of respondents, as shown in the table below, is 39,812 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

<b>Number of Respondents<sup>1</sup></b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are No Longer Subject	(E) Number of Respondents  (E=A+B+C-D)
<i>Miscellaneous Surface Coating</i>					
1	25	831	0	25	831
2	25	831	0	25	831
3	25	831	0	25	831
<i>Commercial Motor Vehicle and Mobile Equipment Refinishing</i>					
1	1,593	35,731	0	1,593	35,731
2	1,593	35,731	0	1,593	35,731
3	1,593	35,731	0	1,593	35,731
<i>Government Motor Vehicle and Mobile Equipment Refinishing</i>					
1	0	250	0	0	250
2	0	250	0	0	250
3	0	250	0	0	250
<i>Paint Stripping</i>					
1	0	1,050	1,950	0	3,000
2	0	1,050	1,950	0	3,000
3	0	1,050	1,950	0	3,000
<b>Average</b>	<b>1,618</b>	<b>37,862</b>	<b>1,950</b>	<b>1,618</b>	<b>39,812</b>

<sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

<sup>2</sup> This ICR assumes a total of 39,812 commercial facilities exist in any given year, and that 1,618 new sources per year will be constructed. This ICR also assumes that existing sources will shut down at a rate equal to that replaced by new sources. Therefore, the total number of affected sources subject to this rule (i.e., 39,812 sources) will not change in any given year.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 39,812.

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

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC) +D
<i>Miscellaneous Surface Coating</i>				
Initial notification letter	25	1	0	25
Notification of compliance status	25	1	0	25



Annual compliance report	831	1	0	831
<i>Subtotal</i>				881
<b><i>Commercial Motor Vehicle and Mobile Equipment Refinishing</i></b>				
Initial notification letter	1,593	1	0	1,593
Notification of compliance status	1,593	1	0	1,593
Annual compliance report	35,731	1	0	35,731
<i>Subtotal</i>				38,917
<b><i>Government Motor Vehicle and Mobile Equipment Refinishing</i></b>				
Initial notification letter	0	1	0	0
Notification of compliance status	0	1	0	0
Annual compliance report	250	1	0	250
<i>Subtotal</i>				250
<b><i>Paint Stripping</i></b>				
Initial notification letter	0	1	0	0
Notification of compliance status	0	1	0	
Annual compliance report	1,050	1	1,950	3,000
<i>Subtotal</i>				3,000
<b>Total (after rounding)</b>				<b>43,048</b>

The number of Total Annual Responses is 43,048.

The total annual labor costs are \$18,400,000. 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 at Area Sources (40 CFR Part 63, 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 below in Tables 1 and 2, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 169,000 hours. 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 at Area Sources (40 CFR Part 63, Subpart HHHHHH) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 4 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$117,000. 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 23,600 labor hours at a cost of \$1,110,000; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Paint Stripping and Miscellaneous Surface Coating at Area Sources (40 CFR Part 63, Subpart HHHHHH) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

### **6(f) Reasons for Change in Burden**

There is an adjustment increase in the labor hours in this ICR compared to the previous ICR. This is due to a change in assumption: this ICR assumes all existing sources will take time to re-familiarize with the regulations each year.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 4 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 neither conduct nor 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-2013-0354. 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-2013-0354 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 at Area Sources (40 CFR Part 63, Subpart HHHHHH) (Renewal)**

Sector	Commercial Misc. Surface Coating	Government Misc. Surface Coating	Paint Stripping	Total
Burden Hours	163,000	877	4,830	169,000
Labor Cost	\$17,800,000	\$96,000	\$529,000	\$18,400,000
Capital and O&M Costs	\$113,000	\$750	\$3,150	\$117,000
<b>Grand Total</b>	<b>\$17,900,000</b>	<b>\$96,800</b>	<b>\$532,000</b>	<b>\$18,500,000</b>

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

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) <sup>b</sup>
1. Applications	Not applicable							
2. Surveys and studies	Not applicable							
3. Reporting requirements								
A. Familiarization with Regulatory Requirements								
New sources	5	1	5	1,618	8,090	404.5	809	\$1,018,761.57
Existing sources	1	1	1	36,562	36,562	1,828.1	3,656	\$4,604,197.82
B. Required activities	Not applicable							
C. Create information								
1. Initial notification letter	1	1	1	1,618	1,618	80.9	161.8	\$203,752.31

2. Notification of compliance status	2	1	2	1,618	3,236	161.8	323.6	\$407,504.63
3. Annual compliance report	2	1	2	36,562	73,124	3,656.2	7,312.4	\$9,208,395.63
<i>Reporting Subtotal</i>						141,025		\$15,442,612
4. Recordkeeping requirements								
A. Familiarization with Regulatory Requirements	Included in 3A							
B. Plan activities	Not applicable							
C. Implement activities								
D. Develop record system	8	1	8	1,618	12,944	647.2	1,294.4	\$1,630,018.50
E. Time to record information								
1. Records of painter certification	0.25	2.4	0.6	7,156	4,293.6	214.68	429.36	\$540,686.61
2. Records of filter efficiency	0.25	1	0.25	357	89.25	4.46	8.93	\$11,239.12
3. Records of spray gun	1.5	1	1.5	0	0	0	0	0
4. Records of deviation from rule requirements and corrective actions taken	1	1	1	1,787	1,787	89.35	178.7	\$225,034.23
F. Time to train personnel	Not applicable							
G. Time for audits								
<i>Recordkeeping Subtotal</i>						21,981		\$2,406,978
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED)<sup>c</sup></b>						<b>163,000</b>		<b>\$17,800,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (ROUNDED)<sup>c</sup></b>								<b>\$113,000</b>
<b>GRAND TOTAL (ROUNDED)<sup>c</sup></b>								<b>\$17,900,000</b>

a. This ICR assumes a total of 39,812 commercial facilities exist in any given year, and that 1,618 new sources per year will be constructed. These commercial facilities comprise both the miscellaneous surface coating and commercial motor vehicle and mobile equipment refinishing categories. This ICR also assumes that existing sources will shut down at a rate equal to that replaced by new sources. Therefore, the total number of affected sources subject to this rule (i.e., 41,430 sources) will not change in any given year.

b. This ICR uses the following labor rates: \$112.98 for technical, \$149.35 for managerial, and \$54.81 for clerical labor. These rates are from the United States Department of

Labor, Bureau of Labor Statistics, December 2013, "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.

c. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 1b: Annual Respondent Burden and Cost – Government-owned Miscellaneous Surface Coating Operations at Area Sources**

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) <sup>b</sup>
1. Applications	Not applicable							
2. Surveys and studies	Not applicable							
3. Reporting requirements								
A. Familiarization with Regulatory Requirements	5	1	5	250	250	13	25	\$31,482.13
B. Required activities	Not applicable							
C. Create information								
1. Initial notification letter	1	1	1	0	0	0	0	0
2. Notification of compliance status	2	1	2	0	0	0	0	0
3. Annual compliance report	2	1	2	250	500	25	50	\$62,964.25
<i>Reporting Subtotal</i>						863		\$94,446
4. Recordkeeping requirements								
A. Familiarization with Regulatory Requirements	Included in 3A							
B. Plan activities	Not applicable							
C. Implement activities								
D. Develop record system	8	1	8	0	0	0	0	0
E. Time to record information								
1. Records of painter certification	0.25	2.4	0.6	0	0	0	0	0
2. Records of filter efficiency	0.25	1	0.25	0	0	0	0	0

3. Records of spray gun	1.5	1	1.5	0	0	0	0	0
4. Records of deviation from rule requirements and corrective actions taken	1	1	1	12.5	12.5	0.63	1.25	\$1,574.11
F. Time to train personnel	Not applicable							
G. Time for audits	Not applicable							
<i>Recordkeeping Subtotal</i>						14		\$1,574
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED)<sup>c</sup></b>						<b>877</b>		<b>\$96,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (ROUNDED)<sup>c</sup></b>								<b>\$750</b>
<b>GRAND TOTAL (ROUNDED)<sup>c</sup></b>								<b>\$96,800</b>

a. EPA estimates a total of 250 existing, government-owned paint shops by assuming one shop per county for counties with a population greater than 240,000. This ICR assumes no new, government-owned paint shops will open over the three-year ICR period.

b. This ICR uses the following labor rates: \$112.98 for technical, \$149.35 for managerial, and \$54.81 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2013, "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.

c. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year <sup>a</sup>	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) <sup>b</sup>
1. Applications	Not applicable							
2. Surveys and studies	Not applicable							
3. Reporting requirements								
A. Familiarization with Regulatory Requirements	2	1	1	1,050	1,050	53	105	\$132,224.93
B. Process/Review information	2	0	0	0	0	0	0	0
C. Create information								
1. Initial notification letter	1	0	0	0	0	0	0	0
2. Notification of compliance status	1	0	0	0	0	0	0	0
3. Annual compliance report	1	1	1	1,050	1,050	52.5	105	\$132,224.93
<i>Reporting Subtotal</i>						2,415		\$264,450
4. Recordkeeping requirements								
A. Familiarization with Regulatory Requirements	Included in 3A							
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	\$264,449.85
D. Time to record information	1	0	0	1,050	0	0	0	0
<i>Recordkeeping Subtotal</i>						2,415		\$264,450
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED)</b>						<b>4,830</b>		<b>\$529,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (ROUNDED)</b>								<b>\$3,150</b>
<b>GRAND TOTAL (ROUNDED)</b>								<b>\$532,000</b>

a. This ICR assumes a total of 3,000 paint stripping facilities exist in any given year. EPA estimates 1,050 of these facilities will use more than 150 gallons per year of paint strippers containing methylene chloride. These facilities are required to develop a written plan and to submit notification of compliance status and annual compliance reports.



- b. This ICR uses the following labor rates: \$112.98 for technical, \$149.35 for managerial, and \$54.81 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2013, "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.
- c. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Paint Stripping and Miscellaneous Surface Coating at Area Sources (40 CFR Part 63, Subpart HHHHHH) (Renewal)**

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) <sup>a</sup>
Applications	Not applicable							
Required activities								
Create information	Not applicable							
Gather information	Not applicable							
Report reviews								
Initial notification letter	0.5	1	0.5	1,618	809	40.45	80.9	\$43,622.90
Notification of compliance status	0.5	1	0.5	1,618	809	40.45	80.9	\$43,622.90
Annual compliance report	0.5	1	0.5	37,862	18,931	946.55	1,893.1	\$1,020,797.38
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED)<sup>b</sup></b>						23,600		\$1,110,000

a. This ICR uses the following labor rates: \$48.08 for technical, \$64.80 for managerial, and \$26.02 for clerical labor. These rates are from the Office of Personnel Management (OPM) 2013 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.

b. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.