

Table 1: Summary of Annual Respondent Burden and Cost – NESHAP for Paint Stripping an

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

id Miscellaneous Surface Coating at Area Sources (40 CFR Part 63, Subpart HHHHHH) (Renewal)

Total
169,000
\$18,400,000
\$117,000
\$18,500,000

4hrs/response

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

<i>Burden Item</i>	(A) Annual O&M Costs per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Average Number of Respondents with O&M
<i>Miscellaneous Surface Coating</i>			
Initial Notification Letter	\$1	1	25
Notification of Compliance Status	\$1	1	25
Annual Compliance Report	\$3	1	831
<i>Subtotal</i>			
<i>Commercial Motor Vehicle and Mobile Equipment Refinishing</i>			
Initial Notification Letter	\$1	1	1,593
Notification of Compliance Status	\$1	1	1,593
Annual Compliance Report	\$3	1	35,731
<i>Subtotal</i>			
<i>Government Motor Vehicle and Mobile Equipment Refinishing</i>			
Annual Compliance Report	\$3	1	250
<i>Subtotal</i>			
<i>Paint Stripping</i>			
Annual Compliance Report	\$3	1	1,050
<i>Subtotal</i>			
TOTAL^a			

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

(D) Total O&M,
(A× B×C)
\$25
\$25
\$2,493
\$2,543
\$1,593
\$1,593
\$107,193
\$110,379
\$750
\$750
\$3,150
\$3,150
\$117,000

Number of Respondents¹				
	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
<i>Miscellaneous Surface Coating</i>				
1	25	831	0	25
2	25	831	0	25
3	25	831	0	25
<i>Commercial Motor Vehicle and Mobile Equipment Refinishing</i>				
1	1,593	35,731	0	1,593
2	1,593	35,731	0	1,593
3	1,593	35,731	0	1,593
<i>Government Motor Vehicle and Mobile Equipment Refinishing</i>				
1	0	250	0	0
2	0	250	0	0
3	0	250	0	0
<i>Paint Stripping</i>				
1	0	1,050	1,950	0
2	0	1,050	1,950	0
3	0	1,050	1,950	0
Average	1,618	37,862	1,950	1,618

¹ This ICR assumes a total of 39,812 commercial facilities exist in any given year, and that 1,618 new be constructed. This ICR also assumes that existing sources will shut down at a rate equal to that rep Therefore, the total number of affected sources subject to this rule (i.e., 39,312 sources) will not chan

(E) Number of Respondents
(E=A+B+C-D)
831
831
831
35,731
35,731
35,731
250
250
250
3,000
3,000
3,000
39,812

sources per year will
 placed by new sources.
 ge in any given year.

Total Annual Responses				
(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
Miscellaneous Surface Coating				
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
Commercial Motor Vehicle and Mobile Equipment Refinishing				
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
Government Motor Vehicle and Mobile Equipment Refinishing				
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
Paint Stripping				
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
Total (after rounding)				43,048

Assumptions:

- 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.

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) (R

	A	B	C	D	E	F	G
Burden Item	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 (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)

(renewal)

H
Total cost per year (\$) ^a