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

Sector	<b>Commercial Misc. Surface</b>	Government Misc. Surface	<b>Paint Stripping</b>
	Coating	Coating	
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

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

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

4 hrs/response
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Capital/Startup vs. Operation and Maintenance (O&M) Costs							
Burden Item	(A)	(B)	(C)				
	Annual O&M	Number of	Average Number of				
	Costs per	Occurrences per	Respondents with				
	Occurrence	Respondent per Year	O&M				
Miscellaneous Surface Coating							
Initial Notification Letter	\$1	1	25				
Notification of Compliance Status	\$1	1	25				
Annual Compliance Report	\$3	1	831				
Subtotal							
Commercial Motor Vehicle and Mol	bile Equipment Re	efinishing					
Initial Notification Letter	\$1	1	1,593				
Notification of Compliance Status	\$1	1	1,593				
Annual Compliance Report	\$3	1	35,731				
Subtotal							
Government Motor Vehicle and Mo	bile Equipment Ro	efinishing					
Annual Compliance Report	\$3	1	250				
Subtotal							
Paint Stripping		_	_				
Annual Compliance Report	\$3	1	1,050				
Subtotal							
TOTAL <sup>a</sup>							

<sup>&</sup>lt;sup>a</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

(D)
Total O&M,
$(A \times P \times C)$
(A× B×C)
#0 <b>.</b>
\$25
\$25
\$2,493
\$2,543
\$1,593
\$1,593
\$107,193
\$110,379
. ,
\$750
\$750
4.55
\$3,150
\$3,150
\$117,000
Ψ117,000

		Num	ber of Respondents <sup>1</sup>	
	Respondents Th	at Submit Reports	Respondents That Do Not Submit Any Reports	
Year Number of New Respondents Respondents Respondents		(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are No Longer Subject	
Miscellane	ous Surface Coating			
1	25 831		0	25
2	25	831	0	25
3	25	831	0	25
Commerci	al Motor Vehicle and Mo	obile Equipment Refinish	ing	
1	1,593	35,731	0	1,593
2	1,593	35,731	0	1,593
3	1,593	35,731	0	1,593
Governme	nt Motor Vehicle and Mo	obile Equipment Refinish	ing	
1	0	250	0	0
2	0	250	0	0
3	0	250	0	0
Paint Strip	pping			
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

 $<sup>^1</sup>$  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)
(E 11. D. C D)
831
831
831
35,731
35,731
35,731
250
250
250
D 000
3,000
3,000
3,000
39,812

sources per year will laced 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				
Subtotal				881				
Commercial Motor Vehicle and Mobile Eq	juipment Refinishir	ıg						
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				
Subtotal				38,917				
Government Motor Vehicle and Mobile Ed	quipment Refinishir	ıg						
Initial notification letter	0	1	0	0				
Notification of compliance status	0	1	0	0				
Annual compliance report	250	1	0	250				
Subtotal				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				
Subtotal				3,000				
Total (after rounding)				43,048				

Table 1a: Annual Respondent Burden and Cost – Commercial Motor Vehicle and Mobile Equipment Refinishing and Miscellaneous Surface Coating Operations at Area Sources

	A	В	С	D	E	F	G	Н
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 <sup>a</sup>	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) b
1. Applications	Not applicable							
2. Surveys and studies	Not applicable							
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								
Initial notification letter	1	1	1	1,618	1,618	80.9	161.8	\$203,752.31
Notification of compliance status	2	1	2	1,618	3,236	161.8	323.6	\$407,504.63
Annual compliance report	2	1	2	36,562	73,124	3,656.2	7,312.4	\$9,208,395.63
Reporting Subtotal						141,025		\$15,442,612
4. Recordkeeping requirements								
A. Familiarization with Regulatory Requirements	Included in 3A							
B. Plan activities	Not applicable							
C. Implement activities	Not applicable							
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								
Records of painter certification	0.25	2.4	0.6	7,156	4,293.6	214.68	429.36	\$540,686.61
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
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	Not applicable							
Recordkeeping Subtotal						21,981	•	\$2,406,978
TOTAL ANNUAL BURDEN AND COST (ROUNDED) <sup>c</sup>						163,000		\$17,800,000
TOTAL CAPITAL AND O&M COST (ROUNDED)								\$113,000
GRAND TOTAL (ROUNDED) <sup>c</sup>								\$17,900,000

## 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 HHHHHHH) (R

	A	В	С	D	E	F	G
	Technical person-		Technical person-hours		Technical	Management	
	hours per	No. of occurrences per	per respondent per year	Respondents	hours per year	hours per year	Clerical hours per
Burden Item	occurrence	respondent per year	(AxB)	per year	(CxD)	(Ex0.05)	year (Ex0.10)

## tenewal)

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Total cost per year (\$) <sup>a</sup>