

**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 2268.06, 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 apply to existing facilities and new facilities 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.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents, and retain the 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.

The “Affected Public” are owners or operators of paint stripping and miscellaneous surface coating operations at area sources. There are approximately 37,862 paint stripping and miscellaneous surface coating area sources. We assume that they will all respond to EPA inquiries. The ‘burden’ to the Affected Public may be found below in Table 1: 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).

Over the next three years, approximately 39,812 respondents per year will be subject to these standards. This includes 1,593 new commercially-owned motor vehicle and mobile equipment refinishing sources and 25 new miscellaneous surface coating sources which will startup each year over the next three years to replace an equivalent number of existing sources that terminate operations. This results in a total of 39,812 affected sources subject to this same 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 paint stripping and miscellaneous surface coating area 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 these standards 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 entities, 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.

Additionally, the EPA is requiring electronic reporting for certain notifications or reports. The EPA is requiring that owners or operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b) and change in information for major source to area source reclassification required in 40 CFR 63.9(j) through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI). For the notifications required in 40 CFR 63.9(b) and 63.9(j), owners and operators would be required to upload a PDF of the required notifications.

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* (86 FR 19256) on April 13, 2021. 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. Approximately 39,812 respondents per year will be subject to these same standards over the three-year period covered by this ICR.

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 that these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the American Coatings Association, at 202-719-3689, and the Halogenated Solvents Industry Alliance, at 703-875-0683.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for 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. The 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. The 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 either 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:

Standard (40 CFR Part 63, Subpart HHHHHH)	SIC Codes	NAICS Codes
<i>Paint Stripping</i>		
Natural Gas Liquid Extraction	1321 2819	211130

Spices and Extracts	2082 2087 2099 2899	311942
Mobile Homes	2451	321991
Basic Chemical Manufacturing	2812 2813 2816 2819 2861 2865 2869 2895	325110 325120 325130 325180 325193 325194 325199
Plastics Material Synthetic Resins, and Nonvulcanizable Elastomers	2821	325211
Paint and Coating Manufacturing	2851 2899	325510
Miscellaneous Chemical Production and Preparation	2819 2899 3952	325998
Alumina Refining	2819	331311
All Other Plastics Products	3069 3089 3996 3999	326199
All Other Miscellaneous Manufacturing	3999	339999
Waste Treatment and Disposal	4953	562211 562212 562213 562219
Materials Recovery	4953	562920
Re-upholstery and Furniture Repair	4581 7641	811420
<i>Miscellaneous Surface Coating</i>		
Aerospace Equipment	3721 3724 3728 3761 3764	332912 336411 336412 336413 336414

	3769	336415 336419 541713
Automobile Parts	3292 3429 3465 3519 3585 3592 3621 3647 3694 3699 37113714 3799 7694	333618 335312 336111 336211 336310 336320 336330 336340 336350 336370 336390 336999
Aluminum Rolling, Drawing, and Extruding	3353 3354 3355 3357 336534423446 3449	331315 331318 331524 332114 332321 332322 332323
Heavy Equipment	3511 3519 3523 3531 3532 3533 3536 3537 3569 3585 3599 3621 7694	333111 333120 333131 333132 333611 333618 333923 333924 333999 335312 336390

Job Shops	3399 3429 3562 3577 3728	332710 332722 332813 332991 334118 336413 339999
Large Trucks and Buses	3537 3711 3713	333924 336120 336211
Metal Buildings	3448	332311
Metal Containers	2655 3325 3411 3412 3443	331513 332420 332431 332439 811310
Metal Pipe and Foundry	3312 3317 3321 3322 3325 3444	331110 331210 331221 331511 331513 332322
Rail Transportation	3531 3743	333914 336510
Recreational Vehicles	3354 3429 3711 3714 3716 3751 3792	331318 336112 336211 336213 336214 336390 336991 336999
Rubber-to- Metal Products	3061 3069	326291 326299
Structural Steel	3441 3448	332311 332312
Other	3715	336212
Transportation Equipment	32923716 3792 3799	336213 336214 336340 336350

		336999 561210 56211 8111
Other industrial and commercial	2522	337214
Miscellaneous Plastic Parts	3086 3089	326140 326150 326199
Office Equipment	3578 3579	333316 333318 334118 334519 339940
Electronics	3663	334220
Medical Equipment	2599 3829 3841	339112 339113
Sporting Equipment	3069	339920
Signs	3993	339950
Marine Equipment	3731 3732 4493	336611 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 are recorded or reported are 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:

Notifications	
Initial notification letter	§§ 63.11175(a),

Notifications	
	63.9(b)
Notification of compliance status	§ 63.11175(b)
Notification of reclassification to area source status or to revert back to major source status (electronic submission)	§§63.9(b), 63.9(j)

Reports	
Annual notification of changes reports	§ 63.11176(a)
MeCl minimization plan report ^a	§ 63.11176(b)

^a 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:

Recordkeeping	
Records of painter training certification	§ 63.11177(a)
Records of spray booth filter efficiency ^a	§ 63.11177(b)
Documentation of acceptable alternatives to spray equipment ^b	§ 63.11177(c)
Records of notifications and reports	§ 63.11177(d)
Records of paint strippers containing MeCl used for paint stripping operations	§ 63.11177(e)
Current methylene chloride minimization plan ^c	§ 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)

^a If a source has a type of filter that is not polyester or fiberglass, it is assumed that these records may be required. It is also 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).

^b 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.

^c The minimization plan is only 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 record-keeping at a plant site.

This rule was recently amended to include electronic reporting provisions on November 19, 2020. Respondents are required to use the EPA’s Compliance and Emissions Data Reporting Interface (CEDRI) to submit notifications in the event of reclassification to area source status and of sources that revert back to major source status. CEDRI can be accessed through the EPA’s Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The notifications are one-time notifications already required in 40 CFR 63.9(j) in the case where the facility is notifying of a change in major source status and is an upload of the currently required notification as a portable document format (PDF) file. For purposes of this ICR, it is assumed that there is no additional burden associated with the requirement for respondents to submit the notifications and reports electronically.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

(ii) Respondent Activities

Respondent Activities
Familiarization with the 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.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.

Respondent Activities
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

5(a) Agency Activities

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

Agency Activities
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. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. The 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

The majority of the respondents are small entities (i.e., small businesses). Because of the large number of small entities 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 small businesses.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Paint Stripping and Miscellaneous Surface Coating at Area Sources (40 CFR Part 63, Subpart HHHHHH) (Renewal).

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 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 102,000 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of this 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	\$149.84 (\$71.35 + 110%)
Technical	\$122.66 (\$58.41 + 110%)

Clerical \$60.88 (\$28.99 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, “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 standard are both labor costs, which are addressed elsewhere in this ICR, and operation and maintenance costs associated with photocopying and postage. There are no capital/startup costs.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Data 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)
<i>Miscellaneous Surface Coating</i>						
Initial Notification Letter	\$0	25	\$0	\$1	25	\$25
Notification of Compliance Status	\$0	25	\$0	\$1	25	\$25
Annual Notification of Changes Report ^a	\$0	25	\$0	\$3	166	\$499
<i>Commercial Motor Vehicle and Mobile Equipment Refinishing</i>						
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 Notification of Changes Report ^a	\$0	1,593	\$0	\$3	7,146	\$21,439
<i>Government Motor Vehicle and Mobile Equipment Refinishing</i>						
Initial Notification Letter	\$0	0	\$0	\$1	0	\$0

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
Notification of Compliance Status	\$0	0	\$0	\$1	0	\$0
Annual Notification of Changes Report ^a	\$0	0	\$0	\$3	50	\$150
<i>Paint Stripping</i>						
Initial Notification Letter	\$0	0	\$0	\$1	0	\$0
Notification of Compliance Status	\$0	0	\$0	\$1	0	\$0
Annual Notification of Changes Report ^a	\$0	0	\$0	\$3	600	\$1,800
TOTAL ^b			\$0			\$27,100

^a This ICR assumes that 20% of respondents will submit a notification of changes report each year.

^b 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 \$27,100. 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 \$27,100. These are the record-keeping costs.

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's overall compliance and enforcement program includes such activities 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 \$322,000.

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

Managerial	\$69.04 (GS-13, Step 5, \$43.15 + 60%)
Technical	\$51.23 (GS-12, Step 1, \$32.02 + 60%)

Clerical \$27.73 (GS-6, Step 3, \$17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 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 at the end of this document 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:

Number of Respondents ^a					
	Respondents That Submit Reports ^b		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ^c	(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	166	665	25	831
2	25	166	665	25	831
3	25	166	665	25	831
<i>Commercial Motor Vehicle and Mobile Equipment Refinishing</i>					
1	1,593	7,146	28,585	1,593	35,731
2	1,593	7,146	28,585	1,593	35,731
3	1,593	7,146	28,585	1,593	35,731
<i>Government Motor Vehicle and Mobile Equipment Refinishing</i>					
1	0	50	200	0	250
2	0	50	200	0	250
3	0	50	200	0	250
<i>Paint Stripping</i>					
1	0	600	2,400	0	3,000
2	0	600	2,400	0	3,000
3	0	600	2,400	0	3,000
Average	1,618	7,962	31,850	1,618	39,812

^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. 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.

^b This ICR assumes that 20% of existing affected sources submit an annual notification of changes report each year. The remaining existing sources would only retain records.

^c New respondents include sources with constructed, reconstructed and modified affected facilities.

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 respondents.

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

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 Notification of Changes Report ^a	166	1	665	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 Notification of Changes Report ^a	7,146	1	28,585	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 Notification of Changes Report ^a	50	1	200	250
<i>Subtotal</i>				250
Paint Stripping				
Initial notification letter	0	1	0	0
Notification of compliance status	0	1	0	0
Annual Notification of Changes Report ^a	600	1	2,400	3,000
<i>Subtotal</i>				3,000
Total (after rounding)				43,000

^a This ICR assumes that 20% of existing affected sources submit an annual notification of changes report each year. The remaining existing sources would only retain records.

The number of Total Annual Responses is 43,000 (rounded).

The total annual labor costs are \$12,100,000 (rounded). Details regarding these estimates may be found at the end of this document in Table 1: 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 both the respondents and the Agency are shown in Tables 1 and 2 at the end of this document, respectively, and

summarized below.

(i) Respondent Tally

The total annual labor hours are 102,000 hours (rounded). Details regarding these estimates may be found below in Table 1: 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 2 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$27,100. 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 6,440 labor hours at a cost of \$322,000; 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 decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This decrease is not due to any program changes. The reason for the change in burden is related to an error in the prior ICR which was corrected in this renewal package. The prior ICR assumed that all sources would submit an annual notification of changes report, but this rule does not require sources to submit an annual report unless a change has occurred in information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report. We have adjusted this assumption, and based on OAQPS discussions with industry, we have

assumed that 20 percent of existing sources will submit a notification of changes report each year; this situation includes submittal of a methylene chloride minimization plan for paint stripping sources using more than one ton of methylene chloride in the calendar year.

The prior ICR also assumed that no government-owned miscellaneous surface coating operations at area sources would need to update records of painter certification or records of filter efficiency each year. We have revised this assumption and estimate that the proportions of government-owned surface coating sources and commercial surface coating sources that must record this information each year will be the same. Therefore, in line with our assumptions for commercial surface coating sources, we have assumed that 20 percent of painters at government-owned surface coating sources will need to have their records updated each year, and that one percent of government-owned surface coating sources will opt to use filters which will require them to test and record the filter efficiency. This adjustment in the burden estimate for government-owned surface coating sources results in an increase in recordkeeping burden for those sources. However, the overall burden estimate for all types of sources, including government-owned surface coating sources, has still decreased due to our corrected assumption regarding annual notification of changes reports. Therefore, the number of sources predicted by this ICR to submit reports has been greatly reduced, and the associated labor and operation and maintenance costs have seen a corresponding reduction. However, the individual cost per respondent of submitting a notification or report has not changed. Since there are no changes in the regulatory requirements and there is no significant industry growth, the only other change is related to the use of updated labor rates. This ICR uses labor rates from the most-recent Bureau of Labor Statistics report (September 2020) to calculate respondent burden costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 2 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either 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-OAR-2021-0115. 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), WJC 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. Due to COVID-19 precautions, entry to the Reading Room is available by appointment only. Please contact personnel in the Reading Room to schedule an appointment. 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-OAR-2021-0115 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	96,000	452	5,520	102,000
Labor Cost	\$11,400,000	\$53,600	\$654,000	\$12,100,000
Capital and O&M Costs	\$25,200	\$150	\$1,800	\$27,100
Grand Total	\$11,400,000	\$53,800	\$656,000	\$12,100,000

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 ^a	Technical hours per year (Cx D)	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							
3. Reporting requirements								
A. Familiarization with Regulatory Requirements								
New sources	5	1	5	1,618	8,090	404.5	809	\$1,102,181.60
Existing sources	1	1	1	36,562	36,562	1,828.1	3,656	\$4,981,206.88
B. Required activities	Not applicable							
C. Create information								
1. Initial notification letter	1	1	1	1,618	1,618	80.9	161.8	\$220,436.32

2. Notification of compliance status	2	1	2	1,618	3,236	161.8	323.6	\$440,872.64
3. Annual Notification of Changes Report	2	1	2	7,312	14,625	731.2	1,462.5	\$1,992,482.75
<i>Reporting Subtotal</i>						73,750		\$8,737,180
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	\$1,763,490.56
E. Time to record information								
1. Records of painter certification ^c	0.25	2.4	0.6	7,312	4,387.4	219.37	438.74	\$597,744.83
2. Records of filter efficiency ^d	0.25	1	0.25	366	91.41	4.57	9.14	\$12,453.02
3. Records of spray gun performance ^e	1.5	1	1.5	0	0	0	0	0
4. Records of deviation from rule requirements and corrective actions taken ^f	1	1	1	1,828	1,828	91.41	182.8	\$249,060.34
F. Time to train personnel	Not applicable							
G. Time for audits	Not applicable							
<i>Recordkeeping Subtotal</i>						22,139		\$2,622,749
TOTAL LABOR BURDEN AND COST (rounded) ^g						96,000		\$11,400,000
TOTAL CAPITAL AND O&M COST (rounded) ^g								\$25,200
GRAND TOTAL (rounded) ^g								\$11,400,000

Assumptions:

^a This ICR assumes a total of 36,562 commercial surface coating 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 will not change in any given year.

^b This ICR uses the following labor rates: \$122.66 for technical, \$149.84 for managerial, and \$60.88 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, “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 Assumes that each facility has 2.4 painters, on average. A record of the certification must be kept for each painter at the facility, and entering the record for each painter is expected to take 15 minutes. Certifications are good for 5-years and it is assumed that each year, 20 percent of the painters will need to have their records updated.

^d Assumes 1% of affected sources will opt to test the filter efficiency of filters that are not polyester fiber or fiberglass. If a source opts to test the efficiency of a filter, it is assumed that the filter manufacturer would perform the test, and the burden on the source would only be the time to record and file the efficiency of this filter based on the results of the manufacturer's test.

^e Only sources without an HVLP gun are required to maintain records on the testing of non-HVLP type spray guns. It is assumed that no source will opt for a testing of their spray gun, and all sources with non-HVLP type spray guns will purchase new guns in response to the rule before the effective date and there are no recordkeeping costs associated with this requirement.

^f The number of sources expected to record a deviation for the rule requirements is based on the assumption of a 95 percent compliance rate. Approximately 5 percent of the estimated 36,652 sources that are required to be in compliance with the rule in any given year are expected to have some type of violation of the proposed work practices.

^g 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 ^a	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							
3. Reporting requirements								
A. Familiarization with Regulatory Requirements	1	1	1	250	250	13	25	\$34,060.00
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 Notification of Changes Report	2	1	2	50	100	5	10	\$13,624.00
<i>Reporting Subtotal</i>						403		\$47,684
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	0	0	0	0	0
E. Time to record information								
1. Records of painter certification ^c	0.25	2.4	0.6	50	30.00	1.50	3.00	\$4,087.20
2. Records of filter efficiency ^d	0.25	1	0.25	3	0.63	0.03	0.06	\$85.15
3. Records of spray gun performance ^e	1.5	1	1.5	0	0	0	0	0
4. Records of deviation from rule requirements and corrective actions taken ^f	1	1	1	13	12.50	0.63	1.25	\$1,703.00
F. Time to train personnel	Not applicable							
G. Time for audits	Not applicable							
<i>Recordkeeping Subtotal</i>						50		\$5,875
TOTAL LABOR BURDEN AND COST (rounded) ^g						452		\$53,600
TOTAL CAPITAL AND O&M COST (rounded) ^g								\$150
GRAND TOTAL (rounded) ^g								\$53,800

Assumptions:

^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: \$122.66 for technical, \$149.84 for managerial, and \$60.88 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, "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 Assumes that each facility has 2.4 painters, on average. A record of the certification must be kept for each painter at the facility, and entering the record for each painter is expected to take 15 minutes. Certifications are good for 5-years and it is assumed that each year, 20 percent of the painters will need to have their records updated.

^d Assumes 1% of affected sources will opt to test the filter efficiency of filters that are not polyester fiber or fiberglass. If a source opts to test the efficiency of a filter, it is assumed that the filter manufacturer would perform the test, and the burden on the source would only be the time to record and file the efficiency of this filter based on the results of the manufacturer's test.

^e Only sources without an HVLP gun are required to maintain records on the testing of non-HVLP type spray guns. It is assumed that no source will opt for a testing of their spray gun, and all sources with non-HVLP type spray guns will purchase new guns in response to the rule before the effective date and there are no recordkeeping costs associated with this requirement.

^f The number of sources expected to record a deviation for the rule requirements is based on the assumption of a 95 percent compliance rate. Approximately 5 percent of the estimated 250 sources that are required to be in compliance with the rule in any given year are expected to have some type of violation of the proposed work practices.

^g 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 ^a	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							
3. Reporting requirements								
A. Familiarization with Regulatory Requirements	1	1	1	3,000	3,000	150	300	\$408,720.00
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 Notification of Changes Report	1	1	1	600	600	30.0	60	\$81,744.00
<i>Reporting Subtotal</i>						4,140		\$490,464
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	600	1,200	60	120	\$163,488.00
D. Time to record	1	0	0	600	0	0	0	0

information							
<i>Recordkeeping Subtotal</i>						1,380	\$163,488
TOTAL LABOR BURDEN AND COST (rounded)^c						5,520	\$654,000
TOTAL CAPITAL AND O&M COST (rounded)^c							\$1,800
GRAND TOTAL (rounded)^c							\$656,000

Assumptions:

^a This ICR assumes a total of 3,000 paint stripping facilities exist in any given year. EPA estimates 600 of these facilities will need to submit an annual notification of changes report each year due to changes occurring after the most recent report or notification, such as changes to the MeCl minimization plan or adoption of a minimization plan due to use of more than one ton of MeCl in a calendar year.

^b This ICR uses the following labor rates: \$122.66 for technical, \$149.84 for managerial, and \$60.88 for clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2020, "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 (\$) ^a
Applications	Not applicable							
Required activities	Not applicable							
Create information	Not applicable							
Gather information	Not applicable							
Report reviews	Not applicable							
Initial notification letter	0.5	1	0.5	1,618	809	40.45	80.9	\$46,481.10
Notification of compliance status	0.5	1	0.5	1,618	809	40.45	80.9	\$46,481.10
Annual Notification of Changes Report	0.5	1	0.5	7,962	3,981	199.06	398.1	\$228,739.85
TOTAL ANNUAL BURDEN AND COST (ROUNDED)^b						6,440		\$322,000

Assumptions:

a. This ICR uses the following labor rates: \$51.23 for technical, \$69.04 for managerial, and \$27.73 for clerical labor. These rates are from the Office of Personnel Management (OPM) 2021 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.