

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

<b>Sector</b>	<b>Commercial Misc. Surface Coating</b>	<b>Government Misc. Surface Coating</b>	<b>Paint Stripping</b>
Burden Hours	96,000	452	5,520
Labor Cost	\$11,400,000	\$53,600	\$654,000
Capital and O&M Costs	\$25,200	\$150	\$1,800
Grand Total	\$11,400,000	\$53,800	\$656,000

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

<b>Total</b>
102,000
\$12,100,000
\$27,100
\$12,100,000

2 hrs/response
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**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
<b>Miscellaneous Surface Coating</b>			
Initial Notification Letter	\$1	1	25
Notification of Compliance Status	\$1	1	25
Annual Notification of Changes Report <sup>a</sup>	\$3	1	166
<i>Subtotal</i>			
<b>Commercial Motor Vehicle and Mobile Equipment Refinishing</b>			
Initial Notification Letter	\$1	1	1,593
Notification of Compliance Status	\$1	1	1,593
Annual Notification of Changes Report <sup>a</sup>	\$3	1	7,146
<i>Subtotal</i>			
<b>Government Motor Vehicle and Mobile Equipment Refinishing</b>			
Annual Notification of Changes Report <sup>a</sup>	\$3	1	50
<i>Subtotal</i>			
<b>Paint Stripping</b>			
Annual Notification of Changes Report <sup>a</sup>	\$3	1	600
<i>Subtotal</i>			
<b>TOTAL<sup>b</sup></b>			

<sup>a</sup> This ICR assumes that 20% of existing affected sources submit an annual notification of changes report. Remaining existing sources would only retain records.

<sup>b</sup> 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
\$499
\$549
\$1,593
\$1,593
\$21,439
\$24,625
\$150
\$150
\$1,800
\$1,800
<b>\$27,100</b>

ort each year. The

<b>Number of Respondents<sup>a</sup></b>			
	Respondents That Submit Reports <sup>b</sup>		Respondents That Do Not Submit Any Reports
Year	(A) Number of New Respondents <sup>c</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports
<i>Miscellaneous Surface Coating</i>			
1	25	166	665
2	25	166	665
3	25	166	665
<i>Commercial Motor Vehicle and Mobile Equipment Refinishing</i>			
1	1,593	7,146	28,585
2	1,593	7,146	28,585
3	1,593	7,146	28,585
<i>Government Motor Vehicle and Mobile Equipment Refinishing</i>			
1	0	50	200
2	0	50	200
3	0	50	200
<i>Paint Stripping</i>			
1	0	600	2,400
2	0	600	2,400
3	0	600	2,400
<b>Average</b>	<b>1,618</b>	<b>7,962</b>	<b>31,850</b>

<sup>a</sup> This ICR assumes a total of 39,812 commercial facilities exist in any given year, and that 1,618 ICR also assumes that existing sources will shut down at a rate equal to that replaced by new sources subject to this rule (i.e., 39,312 sources) will not change in any given year.

<sup>b</sup> This ICR assumes that 20% of existing affected sources submit an annual notification of changes would only retain records.

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

(D)	(E)
Number of Existing Respondents That Are No Longer Subject	Number of Respondents  (E=A+B+C-D)
25	831
25	831
25	831
1,593	35,731
1,593	35,731
1,593	35,731
0	250
0	250
0	250
0	3,000
0	3,000
0	3,000
<b>1,618</b>	<b>39,812</b>

<--Note to EPA: We have adjusted all of these categories to assu

<--Note to EPA: The prior ICR had this split as if 35% of stripping source sources don't submit any reports unless they use >one ton of MeCl, which every year, which is also inaccurate since they still only have to submit re

new sources per year will be constructed. This ces. Therefore, the total number of affected

report each year. The remaining existing sources

ime 20% will submit an annual notification of changes report in each year.

es would submit reports, and 65% would not, but this was based on the assumption (see comment on p. 11 of SS) that str:h is not accurate. So it was treating it as if 35% of MeCl sources use >one ton, and *all* of those >one ton sources will subr:ports when there is a change. With this in mind, we adjusted this number to use the 20% assumption as well.

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nit a report



<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
<b>Miscellaneous Surface Coating</b>				
Initial notification letter	25	1	0	25
Notification of compliance status	25	1	0	25
Annual Notification of Changes Report <sup>a</sup>	166	1	665	831
<i>Subtotal</i>				881
<b>Commercial Motor Vehicle and Mobile Equipment Refinishing</b>				
Initial notification letter	1,593	1	0	1,593
Notification of compliance status	1,593	1	0	1,593
Annual Notification of Changes Report <sup>a</sup>	7,146	1	28,585	35,731
<i>Subtotal</i>				38,917
<b>Government Motor Vehicle and Mobile Equipment Refinishing</b>				
Initial notification letter	0	1	0	0
Notification of compliance status	0	1	0	0
Annual Notification of Changes Report <sup>a</sup>	50	1	200	250
<i>Subtotal</i>				250
<b>Paint Stripping</b>				
Initial notification letter	0	1	0	0
Notification of compliance status	0	1	0	0
Annual Notification of Changes Report <sup>a</sup>	600	1	2,400	3,000
<i>Subtotal</i>				3,000
<b>Total (after rounding)</b>				<b>43,000</b>

<sup>a</sup> 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.



**Assumptions:**

<sup>a</sup> 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.

<sup>b</sup> 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.

**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)

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