

## **SPECIAL DIPPING AND COATING OPERATIONS**

**(29 CFR 1910.126(g)(4))**

**OMB Control Number - 1218-0237**

**Expiration Date: March 31, 2026**

### **SUPPORTING STATEMENT FOR THE INFORMATION COLLECTION REQUIREMENTS IN THE ADDITIONAL REQUIREMENTS FOR SPECIAL DIPPING AND COATING OPERATIONS (29 CFR 1910.126(g)(4))<sup>1</sup> OFFICE OF MANAGEMENT AND BUDGET (OMB) CONTROL NUMBER 1218-0237 (March 2025)**

The agency is seeking an extension of a currently approved data collection.

#### **A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The main objective of the Occupational Safety and Health Act's (OSH Act or Act) is to "assure so far as possible every working man and woman in the Nation safe and healthful working conditions and to preserve our human resources" (29 U.S.C. 651). To achieve this objective, the OSH Act specifically authorizes "the development and promulgation of occupational safety and health standards" (29 U.S.C. 651). Specifically, the Act states that "[t]he Secretary shall set the standard which most adequately assures, to the extent feasible . . . that no worker will suffer material impairment of health or functional capacity . . ." (29 U.S.C. 655).

The OSH Act specifies that "[a]ny standard promulgated under this subsection shall prescribe the use of labels or other appropriate forms of warning as are necessary to ensure that workers are apprised of all hazards to which they are exposed, relevant symptoms and appropriate emergency treatment, and proper conditions and precautions of safe use or exposure. Where appropriate, such standard shall also prescribe suitable protective equipment and control or technological procedures to be used in connection with such hazards . . ." (29 U.S.C. 655). The Act continues by stating, "[w]here appropriate, any such standard shall prescribe the type and frequency of medical examinations or other tests . . . in order to most effectively determine whether the health of such workers is adversely affected by such exposure" (29 U.S.C. 655). Finally, the Act requires that "[e]ach employer shall make, keep and preserve, and make available to the Secretary . . . such records . . . as the Secretary . . . may prescribe by regulation as necessary or appropriate for the enforcement of this Act . . ." (29 U.S.C. 657).

Under its statutory authority granted by the OSH Act, the Occupational Safety and Health Administration (OSHA or agency) published a standard on Special Dipping and Coating Operations [Dip Tanks]. The regulation applies to dipping and coating operations conducted by

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<sup>1</sup> The purpose of this supporting statement is to analyze and describe the burden hours and costs associated with the provision of the special dipping and coating operations standard that contains a paperwork requirement; it does not provide information or guidance on how to comply with or to enforce the standard.

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employers involved in procedures that prevent injury and death among workers exposed to hazards associated with such support operations. Items 2 and 12 below describe in detail the specific information collection requirement of the standard.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the Agency has made of the information received from the current collection.**

### **Dipping and Coating Operations (Dip Tanks) (§ 1910.126(g)(4))**

As specified in paragraph (g)(4), employers must conspicuously post on a sign the minimum safe distance of at least twice the sparking distance between goods being electrostatically deteared and the electrodes or conductors of the electrostatic equipment.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

Employers may use automated, electronic, mechanical, or other technological information collection techniques or other forms of information technology (e.g., electronic submission of responses) when establishing and maintaining the required records. OSHA wrote the standard's paperwork requirement in performance-oriented language (i.e., in terms of what data to collect, not how to record the data).

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item A.2 above.**

The information collection requirement of the standard is specific to each employer and worker involved, and no other source or agency duplicates this requirement. The required information is available only from employers. At this time, there is no indication that any alternate source is available.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The information collection requirement of the standard does not have a significant impact on a substantial number of small entities.

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**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The agency believes that the information collection frequency required by the standard is the minimum frequency necessary to fulfill its mandate “to assure so far as possible every man and woman in the Nation safe and healthful working conditions and to preserve our human resources” as specified in the OSH Act at 29 U.S.C. 651. Accordingly, if employers do not perform the required information collection or delay in providing this information, workers may be at risk of serious injuries or death during special dipping and coating operations.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

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No special circumstances exist that requires employers to collect information in the manner or using the procedures described in this item. The requirements are within the guidelines set forth in 5 CFR 1320.5.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years, even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

As required by the Paperwork Reduction Act of 1995 (PRA) 44 U.S.C. 3506 (c)(2)(A)), OSHA published a notice in the Federal Register on March 11, 2025 (90 FR 11753) soliciting comments from the public and other interested parties on the information collection requirement contained in the standard on Special Dipping and Coating Operations (29 CFR 1910.126) under Docket No. OSHA-2010-0020. This notice was part of a preclearance consultation program intended to provide those interested parties the opportunity to comment on OSHA's request for an extension by OMB of a previous approval of the information collection requirement found in the standard.

The agency received one public comment from SeaRay Beltran in response to this notice under docket number OSHA-2010-0020-0016 on April 9, 2025. The commenter stated that,

*"One significant issue most safety professionals and CSHOs complain about is the word "Training," which is lacking in most general industry standards. Since OSHA has it in the construction industry, then "why isn't it in the general industry?"*

*The training should be standard OSHA 29, CFM standards, which will help everyone develop the S&H program and make it much more manageable. Uniformity is what safety professionals and CSHOs are looking for and so let's make it happen by adopting it into all general industry standards."*

OSHA appreciates Beltran's interest in adding more training to the general industry standards, however, rulemaking is outside of the scope of this information collection request. The scope of

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this notice is to extend OMB's approval of the information collection requirements contained in the Additional Requirements for Special Dipping and Coating Operations Standard for another three years.

### **9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payments or gifts will be provided to the respondents.

### **10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The paperwork requirement specified in the standard does not require the collection of confidential information.

### **11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reason why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

The paperwork requirement specified in the standard does not require the collection of sensitive information.

### **12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**

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- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this should be included in Item 13.

### **Respondent Burden-Hour and Cost Determinations**

OSHA has determined that where electrostatic equipment is being used, the information has already been ascertained and that the “safe distance” has been displayed on a sign in a permanent manner. The agency does not believe that this equipment is currently being manufactured or used due to technological changes. Therefore, OSHA does not believe there is any burden associated with the information collection requirement in the provision; however, in accordance with regulation 5 CFR 1320.3(c)(4)(i), which deems any rule of general applicability to involve ten (10) or more employees, OSHA is claiming a burden of ten (10) responses that each impose a burden of five (5) minutes (5/60 hour).

### **Wage Rates**

The agency determined the wage rate from mean hourly wage earnings to represent the cost of employee time. For the relevant standard occupational classification category, the agency used the wage rates reported in the Bureau of Labor Statistics (BLS), U.S. Department of Labor, *Occupational Employment and Wage Estimates (OEWS)*, May 2023. (OEWS data is available at [https://www.bls.gov/oes/2023/may/oes\\_nat.htm](https://www.bls.gov/oes/2023/may/oes_nat.htm). To access a wage rate, select the year, “Occupation Profiles,” and the Standard Occupational Classification (SOC) code.)

To derive the loaded hourly wage presented in the table below, the agency used data from the BLS *Occupational Employment and Wage Statistics (OEWS)*, as described in the paragraph above. Then, the agency applied to the wage rate a fringe benefit markup from the following BLS release: *Employer Costs for Employee Compensation – September 2024*, News Release text, released 10:00 AM (EDT), Tuesday, December 17, 2024 ([https://www.bls.gov/news.release/archives/ecec\\_12172024.pdf](https://www.bls.gov/news.release/archives/ecec_12172024.pdf)). BLS reported that for private industry workers, fringe benefits accounted for 29.6 percent of total compensation, and wages accounted for the remaining 70.4 percent. To calculate the loaded hourly wage, the agency divided the mean hourly wage rate by 1 minus the fringe benefits.

Table A, below, is a summary of how the wage rate estimates were derived for the information collection requirements specified in the standard.

<b>Table A – Estimated Wage Rates</b>				
<b>Occupational Title</b>	<b>SOC Code</b>	<b>Mean Hourly Wage Rate (a)</b>	<b>Fringe Benefits (b)</b>	<b>Loaded Hourly Wage Rate (c) = ((a)/(1-(b)))</b>
Production Worker	51-9199	\$19.90	0.296	\$28.27

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### Displaying the Minimum Safe Distance (§ 1910.126(g)(4))

This provision requires the employer to determine how far away goods being electrostatically deteared should be separated from electrodes or conductors. This distance is called the “safe distance.” This minimum distance must be displayed conspicuously on a sign located near the equipment. OSHA estimates that it will take a production worker five (5) minutes (5/60 hours) to post each sign at a minimum safe distance for each of the ten (10) non-farm worksites. Therefore, the total annual burden hours and costs to employers for this information collection requirement are:

**Burden hours:** 10 non-farm sites x 5/60 hours = 1 hour (rounded)

**Cost:** 1 hour x \$28.27 = \$28 (rounded)

Table B – Summary of Burden Hours and Cost Estimates							
Collection of Information	Respondents	Number of Signs	Total Responses	Time Per Response	Burden Hours	Loaded Wage Rate	Burden Cost
Dipping and Coating Operations (Dip Tanks) (§ 1910.126(g)(4))	10	1	10	5/60 hours	1 (rounded )	\$28.27	\$28 (rounded)

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)**

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost

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**burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondent (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There are no capital or start-up costs for the collection of information requirement contained in this standard.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

There are no costs to the Federal Government.

**15. Explain the reasons for any program changes or adjustments.**

The agency is requesting to retain its previous approved burden estimate of one (1) hour contained in the standard on Additional Requirements for Special Dipping and Coating Operations (Dip Tanks) (29 CFR 1910.126(g)(4)). There are no program changes or adjustments.

**16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection information, completion of report, publication dates, and other actions.**

OSHA will not publish the information collected under the standard.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**



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OSHA lists current valid control numbers in §§ 1910.8, 1915.8, 1917.4, 1918.4, and 1926.5, and publishes the expiration date in a Federal Register notice announcing OMB approval of the information collection requirements (*See* 5 CFR 1320.3(f)(3)). OSHA believes that this is the most appropriate and accurate mechanism to inform interested parties of these expiration dates.

### **18. Explain each exception to the certification statement.**

OSHA is not seeking an exception to the certification statement.

### **B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.**

This supporting statement does not contain any collection of information requirements that employ statistical methods.