

**Supporting Statement**

**For**

**Information Collection Request**

Emission Defect Information Reports and  
Voluntary Emission Recall Reports (Renewal)

42 USC 7521 § 206  
42 USC 7521 § 213(d)  
40 CFR Part 85  
40 CFR Part 89  
40 CFR Part 90  
40 CFR Part 91  
40 CFR Part 92  
40 CFR Part 94  
40 CFR Part 1048  
40 CFR Part 1051  
40 CFR Part 1068

March 2007

Certification and Compliance Division  
Office of Transportation and Air Quality  
Office of Air and Radiation  
U.S. Environmental Protection Agency



## **1. Identification of the Information Collection**

### **1(a) Title and Number of The Information Collection**

Emission Defect Information Reports and Voluntary Emission Recall Reports (Renewal). EPA Number 0282.14, OMB Control Number: 2060-0048.

### **1(b) Short Characterization/Abstract**

Under Section 206(a) of the CAA (42 USC 7521), engine manufacturers may not legally introduce their products into US commerce unless EPA has certified that their production complies with applicable emission standards. Section 213(d) extends all emission certification and compliance provisions to non-road engines and vehicles. During the certification process, manufacturers must demonstrate that their products comply with applicable emissions standards throughout their useful lives. However, EPA's own in-use testing has shown that some engines exceed the emissions standards during their useful lives for a variety of reasons. Those reasons include defects in materials or design or other factors.

Per sections 207(c)(1) and 213 of the Clean Air Act (CAA), when emission testing shows that a substantial number of properly maintained and used engines produced by a manufacturer do not conform to emission standards, the manufacturer is required to recall the engines. When manufacturers learn of the existence of emission-related defects in 25 engines or more (10 in the case of locomotives) of the same class and model year, they are required to submit a Defect Information Report (DIR). DIRs contain information about the engines on which a defect has been found and a description of the defect and its effects on engine performance and emissions. EPA uses these reports to target potentially nonconforming classes of engines for future testing, to monitor compliance with applicable regulations and to order a recall, if necessary.

Manufacturers can also initiate a recall voluntarily by submitting a Voluntary Emission Recall Report (VERR). VERRs contain information such as the procedures used by manufacturers to notify engine owners, the identification of engines affected, and repairs to be completed on recalled engines. Manufacturers also submit progress reports that track the number of engines repaired. VERRs and VERR updates allow EPA to determine whether the manufacturer conducting the recall is acting in accordance with the CAA and to examine and monitor the effectiveness of the recall campaign.

This information is collected by the Engine Programs Group (EPG), Certification and Compliance Division (CCD), Office of Transportation and Air Quality (OTAQ), Office of Air and Radiation (OAR), U.S. Environmental Protection Agency (EPA). Besides CCD, this information could be used by the Office of Enforcement and Compliance and the Department of Justice for enforcement purposes. Non-confidential portions of the information submitted to EPA could be disclosed to the public upon request. This information is used by trade associations, environmental groups, and the public. Respondents may submit this information in an electronic format.

It has been estimated that an approximate total of 18 engine manufacturers will respond to this collection with an approximate cost of \$324,579.

## 2. Need For and Use of the Collection

### 2(a) Need/Authority for The Collection

EPA's emission compliance programs, including-emissions related recalls, are statutorily mandated; the agency does not have discretion to cease these functions. Sections 207(c)(1) and 213 of the Clean Air Act (CAA) mandate engine manufacturers to conduct recalls when in-use emission testing shows that a substantial number of properly maintained and used engines of the same class or engine family do not conform to emission standards.

Section 208(a) of the Clean Air Act provides EPA with the authority to require a manufacturer to "make reports and provide information the Administrator may reasonably require to determine whether the manufacturer or other person has acted or is acting in compliance" with Title II of the Clean Air Act and regulations thereunder. Regulations implementing such reporting requirements are codified at:

- 40 CFR Part 85, subpart T (On-highway, Heavy-duty Truck Engines)
- 40 CFR Part 89, subpart I (Non-road Compression-ignition Engines)
- 40 CFR Part 90, subpart I (Non-road Spark-ignition Engines)
- 40 CFR Part 91, subpart J (Marine Spark-ignition Engines)
- 40 CFR Part 92, subpart E (Locomotives and Locomotive Engines)
- 40 CFR Part 94, subpart H (Marine Compression-ignition Engines)
- 40 CFR Part 1048, subpart G (Large Spark-ignition Engines)
- 40 CFR Part 1051, subpart A (Recreational Vehicles and Engines)
- 40 CFR Part 1068, subpart F (General Compliance Provisions for Nonroad Engines)

Throughout this document, both Small SI engines (Part 90) and Large SI engines (Part 1048) are collectively referred to as 'SI engines' and Marine SI engines (Part 91) and Marine CI engines (Part 94) are collectively referred to as 'marine engines'. Part 1068 contains compliance provisions applicable to Large SI engines and Recreational Vehicles.

The information collected under this information collection request is needed to identify potentially noncomplying engines. Those engines are then targeted for future testing to ensure that they comply with emission standards throughout their useful lives

### 2(b) Practical Utility/Users of The Data

EPA uses the information requested to ensure compliance with the Clean Air Act's in-use emission requirements. This information collection enables EPA to ensure that engine manufacturers are complying with applicable in-use emission regulations, measure the impact of non-road engines' emissions on air quality, and take corrective actions as needed.

DIRs notify EPA of the existence of defects in a significant number of engines that may cause engine emissions to exceed applicable standards. These reports enable the Agency to take action, as needed. VERRs are used to determine if a manufacturer is acting in accordance with the Clean Air Act and to examine and monitor the effectiveness of the recall campaign. Measures of effectiveness include the procedures the manufacturer is following to notify vehicle owners and provide timely

repairs, the percentage of vehicle owners that are responding to recall notification and the number of engines that are being repaired.

The information will be received and used by EPG/CCD/OTAQ/OAR. Non-confidential portions of the information submitted to EPG is available to and used by importers, environmental groups, members of the public and local, state and federal government organizations.

### 3. **Non-duplication, Consultations, and Other Collection Criteria**

#### 3(a) Non-duplication

The information requested under this ICR is required by statute. Because of its specialized nature, the information collected is not available from any other source.

#### 3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of the public comment period for this ICR renewal was published in the Federal Register on January 10, 2007 (72 Federal Register 1221). **No comments were received.**

#### 3(c) Consultations

EPA consulted less than ten past respondents regarding this information collection burden.

Contact: Mr. Jeffrey Marsee  
Company: Isuzu  
Phone: 734.455.7552 x. 262

Contact: Mr. Bill Passie  
Company: Caterpillar  
Phone: 309.675.5362

Contact: Mr. Richard Jass  
Company: International Truck and Engine Corporation  
Phone: 708.865.3103

#### 3(d) Effects Of Less Frequent Collection

This information is only collected when potential non-compliance with statutory and regulatory requirements triggers these events. Thus, manufacturers are required to provide this information only when potential violations exist. Less frequent collection of DIRs and VERRs would allow potential violations to go undetected. Follow-up progress reports on voluntary recalls are collected quarterly for six quarters. These progress reports or updates are used to monitor the progress of a recall campaign,

observing the promptness with which engines subject to the recall receive the remedial repair. Experience has shown that the quarterly reporting interval is generally the minimum interval for effective oversight of a recall campaign.

3(e) General Guidelines

The only circumstances under which information may be collected from one manufacturer more frequently than quarterly would be if new defects or other factors trigger new DIRs or VERRs. DIRs and VERRs are required by regulation to be submitted not more than 15 days after an emissions-related defect is found (or in the case of a VERR, within 15 days after vehicle owner notification) to affect 25 or more engines (10 for locomotives) of the same model year or engine family. If information necessary to complete the written report is not available to the respondent within 15 days, the respondent may submit the missing information when it becomes available. This collection also requires manufacturers to retain records on defects for five years from the date of manufacture of the vehicle.

3(f) Confidentiality

Any claimed confidential business information that meets the criteria set forth by 5 U.S.C. §552 and 40 CFR Part 2 will be treated as such.

3(g) Sensitive Questions

No questions of a sensitive nature are asked.

**4. The Respondents and the Information Requested**

4(a) Respondents/NAICS Codes

Respondents are manufacturers of non-road engines within the following North American Industry Classification System (NAICS) codes:

- 333618 Other Engine Equipment Manufacturing
- 336312 Gasoline Engine and Engine Parts Manufacturing
- 336999 Other Transportation Equipment Manufacturing
- 336991 Motorcycle, Bicycle and Parts Manufacturing

4(b) Information Requested

(i) Data Items

Tables A through E list the data items requested under this information collection. Some of these data items are required to be kept in records and submitted only upon request.

All manufacturers covered by this ICR are subject to defect information requirements. These requirements are codified at the applicable Part of the Code of Federal Regulations, as follows:

- 40 CFR Part 85, subpart T (On-highway, Heavy-duty Truck Engines)
- 40 CFR Part 89, subpart I (Non-road Compression-ignition Engines)
- 40 CFR Part 90, subpart I (Non-road Spark-ignition Engines)
- 40 CFR Part 91, subpart J (Marine Spark-ignition Engines)
- 40 CFR Part 92, subpart E (Locomotives and Locomotive Engines)
- 40 CFR Part 94, subpart H (Marine Compression-ignition Engines)
- 40 CFR Part 1048, subpart G (Large Spark-ignition Engines)
- 40 CFR Part 1051, subpart A (Recreational Vehicles and Engines)
- 40 CFR Part 1068, subpart F (General Compliance Provisions for Nonroad Engines)

However, Parts 85 and 1068 actually contain the requirements. Parts 89, 90, 91, and 92 simply refer to or contain the same requirements as Part 85. Parts 94, 1048 and 1051 refer the reader to Part 1068. Therefore, to minimize confusion we will be referring to either Part 85 or Part 1068 when citing the regulations, unless a requirement applies to a particular class of engines only.

#### A. Defect Information Reports (DIRs)

Manufacturers are required to submit defect information reports only when their data indicates that an emission-related defect may exist in twenty-five engines or more (10 for locomotives) of the same model year. The reports must be submitted within 15 working days (40 CFR Parts 85.1903) or 21 calendar days (40 CFR 1068.501(c)) after the defect is found. These requirements apply only to engines which have already been sold to the public and remain in effect for five years after the model year in which the engine was certified.

##### Data Items Requested for Defect Information Reports:

- The manufacturer's corporate name
- A description of the defect
- A description of the class or category of engines
- Number of vehicle or engines estimated or known to have the defect and explanation of derivation
- The address of the plant(s) where they were produced
- Evaluation of the emissions impact and any driveability problems it might cause
- Available emissions data related to the defect
- Indication of any anticipated manufacturer follow-up

#### B. Voluntary Emission Recall Reports (VERRs)

Manufacturers have the option to voluntarily initiate a recall. If the recall involves 25 engines or more (one for locomotives), they must notify EPA about the recall within 15 days of the date they first started to notify engine owners about the recall (40 CFR Parts 85.1904(a), 92.404(a)).

#### Data Items Requested for Voluntary Emission Recall Reports:

- A description of the class or category of engines being recalled
- A description of the modifications or repairs made to correct the defects
- A description of the method being used to identify and contact the owners
- A description of any conditions for eligibility for repair and any reasons for the conditions
- A description of the procedure to be followed by the owner to obtain repairs and where the repairs can be obtained
- If repairs are not being performed at dealers, a description of who will perform the repairs and where the defect will be remedied
- Copies of the letters of notification to be sent to the vehicle owners
- A description of the system for assuring an adequate supply of parts is available for the repairs and that they are performed in a timely manner.
- Copies of all necessary instructions to be sent to the persons who are to perform the repairs
  
- A description of the impact of the proposed changes on fuel consumption, driveability, and safety of the engines
- A sample of any labels to be applied to the participant engines identifying the recall being performed

#### C. VERR Progress Reports

VERR Quarterly Progress Reports document the progress of voluntary recalls. Manufacturers of on-highway, heavy-duty truck engines, non-road compression ignition engines and locomotives are required to submit VERR quarterly reports for six quarters following the beginning of any recall campaign (40 CFR 85.1904(b), 40 CFR 1068.525(b), and 40 CFR 92.404(b)). These reports must be submitted no later than 25 working days after the end of each calendar quarter.

Manufacturers of non-road spark-ignition engines need to submit only one report within 18 months of the start of owner notification (40 CFR 90.804(b)). Marine engine manufacturers need to submit a report one year from the start of owner notification (40 CFR 90.804(b)).

VERR Progress Reports for heavy-duty truck engines, non-road compression-ignition engines, large spark-ignition engines, marine compression-ignition engines, locomotives and recreational vehicles must contain:

- Recall campaign number
- Date of owner notification and completion
- Number of engines involved
- Number of engines known or estimated to be affected by the defect
- Number of engines brought in and inspected as part of the campaign
- Number of engines found to have the defect after inspection
- Number of engines actually receiving repair
- Number of engines determined to be unavailable due to exportation, theft, scrapping or other reasons
- Number of engines determined to be ineligible because of improper maintenance or use



- Copies of any service bulletins sent to dealers which relate to the defect that had not previously been reported
- Copies of all communications transmitted to vehicle owners which relate to the defect to be corrected not previously submitted
- Revisions to any of the information previously submitted
- Vehicle owner contact information upon request

VERR Progress Reports for non-road SI engines and marine SI engines contain:

- Methods used to notify owners and dealers
- Number of engines known or estimated to be affected
- Number of engines actually being repaired
- Number of owners and dealers involved
- Number of engines determined to be ineligible because of improper maintenance or use

#### D. Recordkeeping Requirements

Manufacturers of heavy-duty truck engines, non-road compression ignition engines, marine spark-ignition and small spark-ignition engines are required to keep records of all the data gathered to compile the reports for at least five years (40 CFR Part 85.1906(b)). Manufacturers of large spark-ignition engines, marine compression-ignition engines and recreational vehicles must keep records for three years after they filed their last VERR (40 CFR 1068.530). Locomotive and locomotive engine manufacturers, however, must keep these records for eight years (92.406(b)). Manufacturers are required to make all records available to EPA upon request (40 CFR Parts 85.1906(b), 40 CFR 1068.530, and 92.406(b)).

The following information must also be maintained, "in a form suitable for inspection, such as computer information storage devices or card files":

- The names and addresses of vehicle or engine owners:
- To whom notification was given
- Who received remedial repair or inspection
- Who was determined not to be eligible because of improper maintenance or use

#### (ii) Respondent Activities

The activities manufacturers need to perform to comply with the requirements of each type of report are as follows:

- Monitor engine performance by collecting information on the frequency of customer or dealer complaints and findings by their own research departments (customary business practice)
- Review instructions and regulations

- Compile data
- Prepare and submit report
- Maintain records

## 5. **The Information Collected -- Agency Activities, Collection Methodology, and Information Management**

### 5(a) Agency Activities

EPA officials carry out the following activities:

- Review regulations
- Answer respondents' questions
- Review reports for completeness and compliance with regulations
- Analyze reports to determine the impact of the situation described in the report on emission levels
- Evaluate manufacturers' procedures to determine if the problem is being addressed correctly and how effective a recall campaign is
- Recommend, if needed, additional compliance activities such as further testing or research
- Identify engine classes that may need follow up in the future
- Summarize and store the information electronically

### 5(b) Collection Methodology and Management

EPA currently makes extensive use of electronic media in gathering and evaluating information; therefore, EPA prefers to receive the reports electronically. However, it is the manufacturers' choice to submit their reports on paper if they so prefer.

Once the data is received, the information is entered into a database and reviewed for completeness. If the manufacturer chooses to make hard copy submittals, then EPA manually enters the information into the database. The reviewer analyses the information to ensure compliance with the CAA and applicable regulations.

### 5(c) Small Entity Flexibility

The information requested is considered to be the minimum needed to effectively maintain the emission control programs' integrity and comply with the requirements of the Clean Air Act. Further measures to simplify reporting requirements for small businesses do not appear prudent or necessary.

5(d) Collection Schedule

DIRs are collected on occasion only. Manufacturers need to submit a DIR only when it becomes aware of emissions-related defects in 25 engines or more (10 for locomotives) of the same model year. The report is due 15 working days (or 21 calendar days) after the defect is found.

VERRs are also required on occasion, when a manufacturer initiates a voluntary recall campaign of 25 or more engines (one for locomotives). VERRs must be submitted no later than 15 working days after owner notification is initiated.

After a voluntary recall campaign is initiated, manufacturers need to submit update reports describing the progress of the campaign. Manufacturers of heavy-duty truck engines, non-road compression-ignition engines, large spark-ignition engines, marine compression-ignition engines, locomotives and recreational vehicles need to submit six quarterly progress reports (40 CFR 85.1904(b) and 40 CFR 1068.525(b)). These reports are due 25 working days after the end of each calendar quarter. Manufacturers of non-road spark-ignition engines need to submit only one report within 18 months of the start of owner notification (40 CFR 90.804(b)). Marine engine manufacturers need to submit a report on year from the start of owner notification (40 CFR 90.804(b)).

**6. Estimating the Burden and Cost of the Collection**

Please refer Tables 1 and 2 for details.

Table 1

Annual Respondent Burden and Cost - Manufacturers of Heavy-duty Truck Engines, Non-road Compression-ignition Engines,  
Large Spark-ignition Engines, Marine Compression-ignition Engines, Locomotives and Recreational Vehicles

| Information Collection Activity                  | Hours and cost per engine family |                      |                     |                       |               |               |                      |               | Total hours and cost |                   |             |               |
|--|----------------------------------|----------------------|---------------------|-----------------------|---------------|---------------|----------------------|---------------|----------------------|-------------------|-------------|---------------|
|  | Technical @ \$65.20/hr           | Manager @ \$98.10/hr | Legal @ \$99.85 /hr | Clerical @ \$32.09/hr | Respon. hr/yr | Labor Cost/yr | Capital Startup Cost | O & M Cost(1) | Frequency (2)        | Number of Respon. | Total hr/yr | Total Cost/yr |
| <b>Defect Information Reports (DIRs)</b>         |                                  |                      |                     |                       |               |               |                      |               |                      |                   |             |               |
| Review of instructions and regulations           | 7                                | 1                    | 3                   | 0                     | 11            | 854           | 0                    | 0             | 1                    | 13                | 143         | 11,103        |
| Compile Data                                     | 155                              | 0                    | 0                   | 0                     | 155           | 10,106        | 0                    | 12            | 1                    | 13                | 2,015       | 131,534       |
| Prepare and submit report                        | 37                               | 3                    | 2                   | 5                     | 47            | 3,067         | 0                    | 5             | 1                    | 13                | 611         | 39,934        |
| Review report                                    | 4                                | 1                    | 1                   | 1                     | 7             | 491           | 0                    | 0             | 1                    | 13                | 91          | 6,381         |
| <b>Voluntary Emission Recall Reports (VERRs)</b> |                                  |                      |                     |                       |               |               |                      |               |                      |                   |             |               |
| Review regulations                               | 5                                | 0                    | 1                   | 0                     | 6             | 426           | 0                    | 0             | 1                    | 5                 | 30          | 2,129         |
| Compile Data                                     | 30                               | 0                    | 0                   | 0                     | 30            | 1,956         | 0                    | 6             | 1                    | 5                 | 150         | 9,810         |
| Prepare and submit report                        | 10                               | 2                    | 2                   | 3                     | 17            | 1,144         | 0                    | 2             | 1                    | 5                 | 85          | 5,731         |
| Review report                                    | 3                                | 1                    | 1                   | 1                     | 6             | 426           | 0                    | 2             | 1                    | 5                 | 30          | 2,138         |
| Maintain Owner Records                           | 0                                | 0                    | 0                   | 46                    | 46            | 1,476         | 0                    | 30            | 1                    | 5                 | 230         | 7,531         |
| <b>Voluntary Recall Quarterly Reports</b>        |                                  |                      |                     |                       |               |               |                      |               |                      |                   |             |               |
| Review regulations                               | 4                                | 1                    | 1                   | 0                     | 6             | 459           | 0                    | 0             | 2                    | 5                 | 60          | 4,588         |
| Compile Data                                     | 21                               | 0                    | 0                   | 0                     | 21            | 1,369         | 0                    | 2             | 2                    | 5                 | 210         | 13,712        |
| Prepare and submit report                        | 22                               | 0                    | 0                   | 1                     | 23            | 1,466         | 0                    | 2             | 2                    | 5                 | 230         | 14,685        |
| Review report                                    | 1                                | 1                    | 1                   | 1                     | 4             | 295           | 0                    | 1             | 2                    | 5                 | 40          | 2,962         |
| Total per manufacturer                           | 299                              | 10                   | 12                  | 58                    | 433           | 27,125        | 0                    | 67            | varies               | N/A               | N/A         | N/A           |
| Total for the industry                           | N/A                              | N/A                  | N/A                 | N/A                   | N/A           | 251,766       | 0                    | 471           | N/A                  | 10                | 3,925       | 252,237       |

(1) Includes diskettes, photocopying, postage expenses, phone calls, and testing costs, annualized. See section 6(b)(iii) for details.

(2) 1 = one time tasks; 2 = tasks carried out quarterly for 6 quarters annualized over the duration of this ICR (6 times /3 years= 2).

Table 2  
Annual Respondent Burden and Cost - Marine SI and Small SI Engine Manufacturers

| Information Collection Activity                  | Hours and cost per engine family |                      |                     |                       |               |               |                      |               | Total hours and cost |                      |             |               |
|--|----------------------------------|----------------------|---------------------|-----------------------|---------------|---------------|----------------------|---------------|----------------------|----------------------|-------------|---------------|
|  | Technical @ \$65.20/hr           | Manager @ \$98.10/hr | Legal @ \$99.85 /hr | Clerical @ \$32.09/hr | Respon. hr/yr | Labor Cost/yr | Capital Startup Cost | O & M Cost(1) | Frequency (2), (3)   | Number of Respon (3) | Total hr/yr | Total Cost/yr |
| <b>Defect Information Reports (DIRs)</b>         |                                  |                      |                     |                       |               |               |                      |               |                      |                      |             |               |
| Review of instructions and regulations           | 5                                | 1                    | 3                   | 0                     | 9             | 724           | 0                    | 0             | 1                    | 5                    | 45          | 3,618         |
| Compile Data                                     | 150                              | 0                    | 0                   | 0                     | 150           | 9,780         | 0                    | 12            | 1                    | 5                    | 750         | 48,960        |
| Prepare and submit report                        | 35                               | 3                    | 2                   | 5                     | 45            | 2,936         | 0                    | 5             | 1                    | 5                    | 225         | 14,707        |
| Review report                                    | 4                                | 1                    | 1                   | 1                     | 7             | 491           | 0                    | 0             | 1                    | 5                    | 35          | 2,454         |
| <b>Voluntary Emission Recall Reports (VERRs)</b> |                                  |                      |                     |                       |               |               |                      |               |                      |                      |             |               |
| Review regulations                               | 3                                | 0                    | 1                   | 0                     | 4             | 295           | 0                    | 0             | 0.3                  | 1                    | 1           | 89            |
| Compile Data                                     | 29                               | 0                    | 0                   | 0                     | 29            | 1,891         | 0                    | 6             | 0.3                  | 1                    | 9           | 569           |
| Prepare and submit report                        | 10                               | 2                    | 2                   | 3                     | 17            | 1,144         | 0                    | 2             | 0.3                  | 1                    | 5           | 344           |
| Review report                                    | 3                                | 1                    | 1                   | 1                     | 6             | 426           | 0                    | 2             | 0.3                  | 1                    | 2           | 129           |
| Maintain Owner Records                           | 0                                | 0                    | 0                   | 46                    | 46            | 1,476         | 0                    | 30            | 0.3                  | 1                    | 14          | 452           |
| <b>Voluntary Recall Quarterly Reports</b>        |                                  |                      |                     |                       |               |               |                      |               |                      |                      |             |               |
| Review regulations                               | 2                                | 1                    | 1                   | 0                     | 4             | 328           | 0                    | 0             | 0.3                  | 1                    | 1           | 98            |
| Compile Data                                     | 21                               | 0                    | 0                   | 0                     | 21            | 1,369         | 0                    | 2             | 0.3                  | 1                    | 6           | 412           |
| Prepare and submit report                        | 21                               | 0                    | 0                   | 1                     | 22            | 1,401         | 0                    | 2             | 0.3                  | 1                    | 7           | 421           |
| Review report                                    | 1                                | 1                    | 1                   | 1                     | 4             | 295           | 0                    | 1             | 0.3                  | 1                    | 1           | 89            |
| Total per manufacturer                           | 284                              | 10                   | 12                  | 58                    | 257           | 16,519        | 0                    | 31            | varies               | N/A                  | N/A         | N/A           |
| Total for the industry                           | N/A                              | N/A                  | N/A                 | N/A                   | N/A           | 72,242        | 0                    | 100           | N/A                  | 7                    | 1101        | 72,342        |

(1) Includes diskettes, photocopying, postage expenses, phone calls, and testing costs, annualized. See section 6(b)(iii) for details.

(2) 1 = one time tasks; 2 = tasks carried out quarterly for 6 quarters annualized over the duration of this ICR (6 times /3 years= 2).

(3) 0.3=EPA expects only one respondent to submit VERRs and VERRs updates during the 3-year period of this ICR. In interest of clarity, numbers have been rounded.

6(a) Estimating Respondent Burden

Burden estimates were taken from the previous ICR and revised to reflect experience gained by EPA and comments from fewer than 10 respondents consulted by EPA.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

To estimate labor costs, EPA used the Bureau of Labor Statistics' cost estimates for the Engine and Turbines Industry (SIC 351) and increased them by a factor of 110% to account for benefits and overhead. The specific rates used are listed below. These are mean hourly rates.

**Table 3**  
**Labor Costs Estimates**

| <b>Occupation</b>                                 | <b>SOC Code Number</b> | <b>Mean Hourly Rate (BLS)</b> | <b>110%</b> |
|---|------------------------|-------------------------------|-------------|
| Mechanical Engineers                              | 17-2141                | \$59.27                       | \$65.20     |
| Engineering Managers                              | 11-9041                | \$89.18                       | \$98.10     |
| Lawyers   | 23-1011                | \$90.77                       | \$99.85     |
| Secretaries (except Legal, Medical and Executive) | 43-6014                | \$29.17                       | \$32.09     |

(ii) Estimating Capital and Operations and Maintenance Costs

Operation and Maintenance costs (O&M Costs) associated with this information collection include diskettes, photocopying, postage and other shipping expenses and phone calls. Diskettes are used by manufacturers to submit data electronically and to keep records.

There are no capital start-up costs associated with this collection.

(iii) Capital/Start Up Operations and Maintenance Costs

There are no capital start-up costs associated with the renewal of this ICR.

(iv) Annualizing capital costs

There are no capital start-up costs associated with this information collection.

6(c) Estimating Agency Burden

Table 4 summarizes EPA's labor costs associated with this information collection. These costs are based on hourly wage rates obtained from the Office of Personnel Management (OPM) and adjusted by a factor of 1.6 to account for benefits and overhead.

**Table 4**  
**Agency Labor Costs**

| <b>Occupation</b> | <b>Hourly Rate</b> | <b>1.6 Federal Factor for Benefits and Overhead</b> |
|-------------------|--------------------|---|
| Engineer (GS-13)  | \$37.18            | \$59.50   |
| Lawyers (GS-13/7) | \$44.63            | \$71.40   |

Table 5 explains EPA's overall burden associated with this information collection.

Table 5  
Annual Agency Burden and Cost

| Information Collection Activity                           | GS 13 Engineer @ \$59.50/hr | Lawyer GS 13-7 @ \$71.40/hr | Agency hr/yr | Agency Labor cost/yr | Capital Startup Cost | O & M Cost (1) | Number of Respon. | Total hr/yr | Total cost/yr |
|---|-----------------------------|-----------------------------|--------------|----------------------|----------------------|----------------|-------------------|-------------|---------------|
| <b>DIRs and VERRs</b>                                     |                             |                             |              |                      |                      |                |                   |             |               |
| Review regulations  | 1.0                         | 1.0                         | 2            | 131                  | 0                    | 0              | 5                 | 10          | 655           |
| Answer respondent questions                               | 2.0                         | 1.0                         | 3            | 190                  | 0                    | 7              | 18                | 54          | 3,553         |
| Review reports for format and completeness                | 2.0                         | 0.0                         | 2            | 119                  | 0                    | 0              | 18                | 36          | 2,142         |
| Analyze reports, evaluate mfrs procedures                 | 6.0                         | 1.0                         | 7            | 428                  | 0                    | 2              | 18                | 126         | 7,747         |
| Request additional information, if needed                 | 1.0                         | 1.0                         | 2            | 131                  | 0                    | 5              | 18                | 36          | 2,446         |
| Enter data from reports into database and file submittals | 1.0                         | 0.0                         | 1            | 60                   | 0                    | 1              | 18                | 18          | 1,089         |
| <b>Voluntary Emission Reports (VERRs)</b>                 |                             |                             |              |                      |                      |                |                   |             |               |
| Review, analyze and summarize                             | 3.0                         | 0.0                         | 3            | 179                  | 0                    | 0              | 5.3               | 15.9        | 946.1         |
| Data entry and file                                       | 1.0                         | 0.0                         | 1            | 60                   | 0                    | 1              | 5.3               | 5.3         | 320.7         |
| <b>VERR Updates</b>                                       |                             |                             |              |                      |                      |                |                   |             |               |
| Review, analyze and summarize                             | 1.0                         | 1.0                         | 2            | 131                  | 0                    | 0              | 10.3              | 20.6        | 1,348.3       |
| Data entry and file                                       | 1.0                         | 0.0                         | 1            | 60                   | 0                    | 1              | 10.3              | 10.3        | 623.2         |
| Total per report  | 19                          | 5                           | 24           | 1,488                | 0                    | 17             | 18                | N/A         | N/A           |
| Total for the agency                                      | N/A                         | N/A                         | N/A          | 20,585               | 0                    | 286            | 18                | 332         | 20,870        |

(1) Includes photocopying, postage expenses and calls.



6(d) Estimating the Respondent Universe and Total Burden and Costs

In average, EPA expects to receive approximately 18 DIRs from 18 different respondents, annually. Thirteen of these respondents are manufacturers of heavy-duty truck engines, non-road compression-ignition engines, large spark-ignition engines, marine compression-ignition engines, locomotives and recreational vehicles. The other five are manufacturers of either marine or non-road spark-ignition engines.

As noted earlier, the number of VERR Progress Reports a manufacturer needs to submit depends on the type of engine it manufactures. Manufacturers of non-road spark-ignition engines and marine SI engines need to submit only one progress report per VERR filed. Only one manufacturer from this category usually files a VERR during any three-year period. That comes to 0.3 reports per year per respondent when annualized.

Other manufacturers need to submit 6 quarterly reports per VERR filed, which results in 2 reports per year when that number is annualized over the three-year period that this ICR covers. Only 5 of these types of manufacturers will go on to file VERRs every year.

6(e) Bottom Line Burden Hours and Cost Tables

(i) Respondent Tally

**Table 6**  
**Total Estimated Respondent Burden and Cost Summary**

| <b>Type of Respondent</b>          | <b>Number of Respon</b> | <b>Number of Activities</b> | <b>Total Hours per Year</b> | <b>Total Labor Cost per Year</b> | <b>Total Capital Costs per Year</b> | <b>Total O&amp;M Costs per Year</b> | <b>Total Costs</b> |
|------------------------------------|-------------------------|-----------------------------|-----------------------------|----------------------------------|-------------------------------------|-------------------------------------|--------------------|
| Trucks, CI engines and locomotives | 13                      | 13                          | 3,925                       | \$251,766                        | 0                                   | \$471                               | \$252,237          |
| Marine and Small SI engines        | 5                       | 13                          | 1101                        | \$72,242                         | 0                                   | \$100                               | \$72,342           |
| <b>Total</b>                       | <b>18</b>               | <b>13</b>                   | 5026                        | \$324,008                        | <b>0</b>                            | \$571                               | <b>\$324,579</b>   |

(ii) The Agency Tally

**Table 7**  
**Total Estimated Agency Burden and Cost Summary**

| <b>Number of Reports</b> | <b>Number of Activities</b> | <b>Total Hours per Year</b> | <b>Total Labor Cost per Year</b> | <b>Total Capital Costs per Year</b> | <b>Total O&amp;M Costs per Year</b> | <b>Total Costs</b> |
|--------------------------|-----------------------------|-----------------------------|----------------------------------|-------------------------------------|-------------------------------------|--------------------|
| 33.6                     | 10                          | 332                         | \$20,585                         | 0                                   | \$286                               | \$20,870           |

6(f) Reasons for change in burden

There is an increase in burden of 609 hours associated with this ICR renewal. Burden hours have been increase to reflect the fact that new manufacturers will take more time to perform certain tasks and to account for an expected increase in respondents (by one respondent per year).

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection is estimated to average 148 hours per respondent. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information 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 not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 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-2006-0895, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. 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. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket and Information Center is (202) 566-1742. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public 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 above. Also, you can send comments to

the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2006-0895 and OMB Control Number 2060-0048 in any correspondence.