

Justification Statement for Non-Material Change

Nonroad Small SI Engines and Equipment

2060-0603

Two ICR's contain information collection requirements for the Small SI (<19kW) engine exhaust program.

The two ICR's include:

- 1) Emissions Certification and Compliance Requirements for Nonroad Spark-Ignition Engines, 2060-0338, and
- 2) Information Requirements for Nonroad Small SI Engines and Equipment, 2060-0603.

The information collection requirements that are duplicated include most of the programmatic items for the nonroad small SI exhaust requirements which include Certification application with fee, recordkeeping, Certification emission testing (including durability), SEA, PLT. 2060-0603 is to be changed by removing these requirements. Two aspects of the nonroad small SI engine certification that do need to be kept within the 2060-0603 ICR include the cost for the Part 1065 test cell upgrades and defect reporting. Part 1065 test cell upgrades accounts for \$5,528,763 in Annualized Capital and Startup costs and defect reporting accounts for 462 hours/yr and \$17,168 in labor costs.

Hence, a total of 50,839 hours and \$5,329,003 (\$2,065,643 in labor costs and \$3,263,360 in capital and O&M costs) are to be removed from ICR 2060-0603.