

Supporting Statement  
for  
Information Collection Request

Information Requirements for Importation of Nonconforming Vehicles (Renewal)

EPA ICR 0010.12

April 2010

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

**PART A OF THE SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**1. IDENTIFICATION OF THE INFORMATION COLLECTION**

**(a) TITLE OF THE INFORMATION COLLECTION**

Information Requirements for Importation of Nonconforming Vehicles (40CFR Part 85, Subparts P and R) (Renewal), EPA ICR Number 0010.12, OMB Control Number 2060-0095

**(b) SHORT CHARACTERIZATION (ABSTRACT)**

The Clean Air Act requires motor vehicles and engines imported into the U.S. to conform to applicable emission requirements. This Information Collection Request (ICR) covers importation reporting requirements for light-duty vehicle, light-duty truck, and on-road motorcycle vehicles and engines. The information collection instruments are Form 3520-1 ("Form 1") for initial entry, and Form 3520-8 ("Form 8") for final entry (see below). All heavy-duty on-road and all non-road vehicle and engine importation reporting requirements are now covered by ICR 1723 (OMB 2060-0294). The two programs use separate forms, have differing regulatory provisions, and are processed by differing staffs. Most importers are also required to apply for and obtain a certificate of conformity from EPA; that information burden for the light-duty and motorcycle certification program is covered by ICR 0783 (OMB 2060-0104). There is some program overlap between the present ICR and 0783 because testing for Independent Commercial Importers (ICIs) is reported both on Form 8, covered by this ICR, and, initially and in more detail, for certification purposes, via ICR 0783. (Similarly, all importing light-duty vehicle and motorcycle manufacturers, and not just ICIs, use Form 1.) Thus, the certification information burden is covered in ICR 0783 and the (different and less detailed) testing burden for imports subsequent to certification for ICIs in this ICR.

The burden of submitting the fee and associated forms is covered by ICR 2080 (OMB 2060-0545).

The post-certification, final-entry testing burden for light-duty vehicle imports falls into two categories. For the category of certified light-duty ICIs, a city test (the "FTP") is required for every third vehicle imported under a certificate for the first 300 vehicles imported, and every fifth thereafter (40 CFR 85.1505). The second light-duty imports category is "mod and test", which applies to vehicles whose original production year is six or more prior to the year of importation. Each such vehicle must be modified to meet applicable emissions requirements and tested with the FTP (40 CFR 85.1509). In the first category, each FTP test will be accompanied by a two-hour evaporative emissions test, and in both categories, by a highway test in order to compute a combined fuel economy number to comply with fuel economy requirements. Form 8 includes spaces for reporting the test results and combined fuel economy for those vehicles that undergo them. A very limited number of nonconforming motorcycles have been imported in the last three years.

Most are imported under a provision (40 CFR 85.1505(a)(2)(i)) that allows for no additional testing beyond the original certification testing. Otherwise, testing requirements are the same as those for light duty vehicles except that a highway test is not required.

Most ICIs contract with a broker to do some of the imports process and a testing laboratory to perform the necessary tests. The testing lab also performs whatever modifications are necessary to bring the vehicle up to certification standards.

The Compliance and Innovative Strategies Division (CISD) in EPA's Office of Transportation and Air Quality collects information and requires some recordkeeping to help insure that imported vehicles and engines are brought into compliance with federal emission requirements or that they qualify for exemption or exclusion from them. "Nonconforming" refers to the vehicles and engines that are not constructed to EPA certification standards and therefore must meet various additional requirements, such as testing, prior to being certified and available for sale in the U.S. The information is also used by the U.S. Customs Service (Customs), state regulatory agencies, businesses, and individuals to verify whether or not vehicles are in compliance.

Information collected includes vehicle identification data, U.S. Customs entry statements that such information is correct, and summary emission test results. The information is either stored in a computer database, or retained in document form. The information is used to monitor compliance of imports and respond to inquiries from the public concerning the compliance status of specific imported vehicles. This information is collected on two forms (attached in ICRAS):

EPA Form 3520-1. This form is used by importers who are applying for entry into the U.S. of light-duty vehicle, light-duty truck, and motorcycle vehicles or engines, whether conforming, nonconforming, exempt, or excluded. The form identifies to all parties involved the category of import and the requirements that are appropriate to that category. The form goes from the importer or its agent (broker) to Customs, which stamps the form and forwards it in batch to EPA. EPA gathers the forms in Ann Arbor where they are logged and filed for future reference. The form is posted on EPA's imports website, <http://www.epa.gov/otaq/imports/index.htm> .

EPA Form 3520-8. This form is used by ICIs to request "final admission" of a nonconforming vehicle or engine upon their certification that it has been brought into compliance with Federal emission requirements. The form is held for fifteen days, during which the ICI can not release the vehicle for sale or to its owner. This gives EPA a chance to conduct any review or oversight, including confirmatory testing, deemed necessary before the vehicle or engine is released.

The EPA requests a waiver from posting the expiration date of the OMB clearance on these forms. Because Form 1 is used by both Customs, EPA, and importers, repeated uploadings to the imports website and revisions to reflect expiration of the clearance deadline, continuation of clearance pending review, and the new expiration date may be

burdensome, with the existence of revisions inadequately communicated to users. Form 8 has a limited number of users who in the past have had to be individually contracted to inform them of substantive updates. Posting of Form 8 on the imports website is currently under consideration. Both forms have been in use for many years and importers are familiar with their features.

The information collection will involve an estimated yearly 12,352 responses from 12,005 respondents at an Operations & Maintenance (O&M) cost of \$90,894, a capital cost of \$73,353, and a labor cost of \$370,803 (see Table 1 below).

## **2. NEED FOR AND USE OF THE COLLECTION**

### **(a) NEED/AUTHORITY FOR THE COLLECTION**

Joint EPA and Customs regulations at 40 CFR 85.1501 et seq., 19 CFR 12.73, and 19 CFR 12.74, promulgated under the authority under the Clean Air Act (Sections 203 and 208), give authority for the collection of the information. The collection helps insure compliance of imported vehicles and engines with federal emissions requirements, which helps meet the Agency goal of reducing air pollution. Without this information, EPA and Customs officials could not confirm that imported vehicles and engines conform to U.S. emission requirements, and consequently would not be able to allow importation or sale of these vehicles and engines.

### **(b) PRACTICAL UTILITY/USERS OF THE DATA**

The information on Form 1 and Form 8 is used by Customs and/or Agency personnel to verify that all Federal emission requirements (or exemptions or exclusions thereto) concerning imported nonconforming light-duty motor vehicles and motorcycles are met. The information is also used to identify and prosecute violators of the regulations and to monitor the program in achieving the objectives of the regulations. It is also used to answer public inquiries concerning the compliance or exempted or excluded status of particular motor vehicles. Public access to this information is not direct but rather through the EPA's imports section and the Automotive Imports Helpline in order to maintain security of information protected under the Privacy Act.

## **3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

### **(a) NON-DUPLICATION**

A search of the Government Information Locator System (GILS) found no other program or agency collecting this information. As explained above, Form 1 is necessary to identify, at the point of importation, the applicable category of the vehicle or engine for regulatory purposes; Form 8 is necessary to report test results to EPA (where required) and alert it of pending release to the owner. As stated on Form 1, vehicles that are primarily manufactured for use on public roads are also required to file an HS-7 Declaration Form to identify the basis for the vehicle's admission under the laws

administered by the Department of Transportation (DoT). EPA had discussions with the DoT in late 2005 that considered whether a combined form would be feasible, and the conclusion was that a single form was not practical at this time because of the unique requirements of each program and the different agencies administering them.

**(b) PUBLIC NOTICE**

A Federal Register notice was published, soliciting public comment for this ICR on January 22, 2010 (75 FR 3723). A copy of the draft Supporting Statement was also placed in the docket. No comments were received.

**(c) CONSULTATIONS**

Consultations have been made with ICIs to discuss form revisions, to update burden and cost estimates, and to receive suggestions about the operation of the program. The following ICIs were contacted:

Auto Enterprises, Inc.  
850 N. Rochester Rd.  
Clawson, MI 48017  
Rep: Mr. Philip Trupiano  
Phone: (248) 723-6677

J.K. Technologies , L.L.C.  
3500 Sweet Air Street  
Baltimore, MD 21211  
Rep: Mr. Jonathan Weisheit  
Phone: (410) 366-6332

Compliance and Research Services, Inc.  
1701 Front Street  
Plainfield, NJ 07063-1066  
Rep: Bob DePalma  
Phone: (908) 561-1824

**(d) EFFECTS OF LESS FREQUENT COLLECTION**

Since reporting is done only at the time of initial and “final” entry, the effects of less frequent collection would be to seriously undermine the Agency's ability to determine whether vehicles being imported meet applicable emission requirements. Consequently, the Agency would not be able to allow entry of vehicles being imported. Therefore, less frequent collection is not feasible.

**(e) GENERAL GUIDELINES**

This ICR requires that ICIs notify EPA when requesting final admission for vehicles

(Form 8) and this may occasionally result in reporting more often than quarterly if vehicles are tested and ready for sale more frequently than quarterly. This requirement is necessary for EPA to have the opportunity to inspect vehicles prior to release from the ICI. If EPA only required quarterly reports, either the ICI would have to hold vehicles and release them on a quarterly basis or EPA would not likely have the opportunity to inspect or require confirmatory testing of vehicles imported by the ICI.

EPA's regulations require that ICIs retain records for a period of six years from the date of entry (40 CFR 85.1507(a)). ICIs are responsible for the same emissions warranties that apply to original manufacturers, generally extending to 8 years or 80,000 miles for major emission control components. The Clean Air Act requires that light-duty vehicles meet federal emission standards throughout their useful lives, which is defined by the Clean Air Act to be either 10 years or 100,000 miles (Sec. 202(d)); these requirements are implemented through the certification process for ICIs just as they are for original manufacturers. The imports regulations specify that the useful life period starts from the date that the vehicle is released to the owner by the ICI. The six-year record retention requirement is the minimum considered consistent with these obligations.

**(f) CONFIDENTIALITY**

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to policies set forth in Title 40, Chapter 1, Part 2, Subpart B - Confidentiality of Business Information (CBI) (see CFR 2). The public is not permitted access to information containing personal or organizational identifiers. This collection complies with the Privacy Act of 1974 and OMB Circular A-130.

**(g) SENSITIVE QUESTIONS**

There are no sensitive questions.

**4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

**(a) RESPONDENTS/NAICS CODES**

The Light-duty Vehicle Group and Imports Team of CISD collect information from individual importers and both small and large companies that import light-duty vehicle, light-duty truck, and on-road motorcycle vehicles or engines. The NAICS code for respondents is: 1) 423110, Automobile and Other Motor Vehicle Merchant Wholesalers; and 2) 441200, Other Motor Vehicle Dealers.

**(b) INFORMATION REQUESTED**

**(i) Data Items**

The data requested in reports include:

- vehicle identification number
- vehicle make
- vehicle model
- model year of the vehicle
- port of entry
- date of entry
- entry number
- importer name, address and telephone number
- owner name, address, telephone number and SSN or EIN
- emission test results
- applicable EPA certificate of conformity
- fuel economy
- test date
- modification date
- name of emissions test laboratory
- vehicle storage location
- justification for an exclusion or exemption, if applicable and records are maintained

on:

- documents related to certification, modification, importation, storage, registration or emission testing
- bills of sale, invoices, or purchase agreements
- documents providing parts identification data associated with the emission control system
- documents providing evidence of the initiation of the "hold period"

### **(ii) Respondent Activities**

To complete the collection, the respondent would:

- read form instructions
- collect data and complete forms
- conduct required emission testing (ICIs only)

INFORMATION REQUIREMENTS FOR  
IMPORTATION OF NONCONFORMING MOTOR VEHICLES  
AND MOTOR VEHICLE ENGINES  
(40 CFR PART 85, SUBPARTS P and R) (Renewal)

INFORMATION REQUIREMENTS

CITATION

### **I. ICI requirements**

- Reporting
- Application for final admission 85.1505(a)

- (certified)
- Reasonable assistance during inspection, 85.1506(c),(g)
- (4)
  - including copies of records or documents 85.1506(b)(2)
  - Application for final admission 85.1509(b)
  - (modification/test)
  - Repair and retest 85.1509(g)
  - Maintenance instructions, attestation, 85.1510(a)
  - parts list
  - Altitude compensator instructions, attestation 85.1510(b)
  - Emission warranties, attestation 85.1510(c)
  - Emission labeling, attestation 85.1510(d)
  - Fuel economy labeling, attestation 85.1510(e)
  - Gas guzzler tax forms, attestation 85.1510(f)
  - Reply to notice of suspension or 85.1513(f)(3)(ii),
  - revocation 85.1513(f)(3)(iv)
  - 85.1513(f)(6)
  - Request for hearing 85.1513(f)(3)(iii)

#### Recordkeeping

- Certification, modification, test, purchase, 85.1507
- sale, storage, registration, importation
- Owners or ultimate purchasers 85.1508(b)
- Maintenance instructions, parts list, 85.1510
- altitude compensator instructions,
- emission warranties, emission labeling,
- fuel economy labeling

## II. Requirements applying to all importers

- Notification of conditional admission 85.1504(a)
- Request for prior approval (exemption), 85.1511(b),(g)
- request for extension of exemption
- Request for prior approval (exclusion) 85.1511(c)-(g)
- Attestations, copy of paid invoice 85.1512(f)
- Claim of confidentiality 85.1514

## 5. THE INFORMATION COLLECTED: AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

### (a) AGENCY ACTIVITIES

Form 1s are collected as they are received from Customs and, in some cases, from importers or their agents and collected by the Imports Team; Form 8s are collected by the Imports Team and copies distributed to certification staff; since late 2005 the data from Form 8 has been entered into the Automated Imports Tracking System (AITS). After



receiving the information, EPA uses it to determine whether vehicles meet EPA requirements and whether to conduct investigations or require confirmatory testing, and retains it in order to respond to public, State government, and Federal government inquires. In addition, ICI applications for certification are now included in the “Verify” information system, effective with the 2010 year imports.

#### **(b) COLLECTION METHODOLOGY AND MANAGEMENT**

Form 1 is available in fillable .pdf form downloadable from EPA's imports website. Form 8 has recently been converted to fillable and posting at the same site is under consideration. Forms are submitted to EPA by the importer or its agent or Customs after being filled out at the port of entry in the case of Form 1 and by the importer or its agent in the case of Form 8. Both Customs and CISD use the information to determine if vehicles meet EPA requirements. CISD retains information in the AITS and document form in order to respond to public, State government, and Federal government inquires, which are handled by CISD staff.

#### **(c) SMALL ENTITY FLEXIBILITY**

Small entities that are required to submit information to EPA have been doing so by completing and submitting EPA paper forms. EPA regulations provide, as an alternative, for submission of imports data electronically (e.g. 40 CFR 85.1505(a), 85.1509(b) & (c)). Under EPA guidance (CCD-02-04; (<http://www.epa.gov/otaq/cert/dearmfr/dearmfr.htm>)), ICIs qualify *per se* as small volume manufacturers entitled to the special provisions available to all certifying small manufacturers under EPA’s certification regulations. As stated above, ICI certification activities are now conducted electronically via “Verify”. Form 8s are currently submitted electronically as email attachments or in paper form.

#### **(d) COLLECTION SCHEDULE**

The information is not subject to a collection schedule, but is collected at the time of vehicle entry and when the vehicle is ready for final admission by EPA.

### **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

#### **(a) ESTIMATING RESPONDENT BURDEN (HOURS)**

See the table below. Each form is estimated to take 0.5 hours to complete. Completing required post-certification testing is estimated at 28 hours per test. There is no requirement for importers to keep copies of Form 1. Extra recordkeeping for Form 8s were formerly estimated at an additional 0.5 hour per form; however, these recordkeeping burdens are more appropriately attributed to the certification ICR, which will be adjusted accordingly during the next renewal. There is no recordkeeping burden associated with Form 8 other than adding it to the existing records for the certified family.

#### **(b) ESTIMATING RESPONDENT COSTS**

**(i) Labor Costs**

Labor costs are considered to be more closely approximated by the motor vehicle manufacturing industry, NAICS 336100, than retail and wholesale trades in vehicles that do not involve testing and modification. Rates for engineering managers, mechanical engineers, and secretaries (except legal, medical, and executive) are from the May 2008 National Industry-Specific Occupational Employment and Wage Estimates ([http://www.bls.gov/oes/2008/may/naics4\\_336100.htm](http://www.bls.gov/oes/2008/may/naics4_336100.htm), accessed December 10, 2009). With a 160% overhead multiplier, these are \$87.30, \$60.40, and \$30.50, respectively. Test labor costs are \$55.82 per hour based on ICR 0783.54.

**(ii) Operations and Maintenance (O&M) Costs**

Operations and maintenance costs apply only to Form 8 and were calculated based on responses received from the ICIs contacted. The Operations and Maintenance cost for reporting ordinarily involves a purchase of services from a broker who complete a package of importation forms (including those of other agencies) and files them with both Customs and EPA. This cost is estimated as a component of overall broker activities to import a vehicle or engine, and incorporates a \$2 per form paperwork cost for broker form handling within overall broker activities, and a \$3 per form mailing cost for Form 8s. O&M costs associated with testing are much less than those for certification vehicles; post-certification vehicles do not have mileage accumulation or durability demonstration requirements or consequent vehicle depreciation; vehicle preparation is minimal. O&M testing costs are estimated at \$651 per vehicle. Costs associated with modification of vehicles necessary to bring them up to certification standards are excluded: they are not reported on the imports forms, they vary widely depending on the vehicle being imported, and they therefore can not be predicted or accounted from one year to another; finally, they are analogous to, for example, the costs of catalytic converters and other emissions control technologies that original manufacturers are required to install in vehicles in order to comply with the Clean Air Act, and which are not included in the certification paperwork burden.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>				
	O&M	Capital/Startup (unamortized)	Capital/Startup (amortized)	Total Dep. Cap + O&M
Filing				
Form 3520-1	\$0	0	\$0	\$0
Form 3520-8	\$1,056	0	\$0	\$0

Testing

Form 3520-8

Regular ICI	\$62,496	\$358,400	\$51,028	\$113,524
Mod and Test	\$27,342	\$156,800	\$22,325	\$49,667
Total	\$90,894	\$515,200	\$73,353	\$164,247

**(iv) Capital/Start-up Costs**

Consistent with ICR 0783, a capital cost of \$4,000,000 for a test facility capable of conducting 750 combined FTP and highway tests per year has been allocated on a per-test basis. Following ICR 2387.01, which is the Light Duty Greenhouse Gases rule ICR, this is allocated 0.7 to the FTP portion. For ICIs, these test facility costs will in most cases be covered by contractual costs between the importer and a testing laboratory. As mentioned above, these costs listed here are not initial certification costs but the post-certification test costs for additional imported vehicles. As with other ICRs, these capital costs are annualized and subject to 7% interest depreciation but are considered to be ongoing rather than startup capital costs in the sense that as facilities are depreciated they are continually being replaced.

**(c) ESTIMATING AGENCY BURDEN AND COST**

The imports program is administered by EPA's Compliance and Innovative Strategies Division (CISD). Forty percent of one Full Time Equivalent employees (FTE), GS 12/3; twenty percent of one Senior Environmental Employment (SEE) Program employee (the SEE Program is an employment program for older workers authorized by the Environmental Programs assistance Act, passed by Congress in 1984, and provides employment opportunities to senior citizens age 55 and over); and a portion of the work assignment under a government contract are allocated to imports activities. Government cost is based on a GS-12, step 3 salary for professional engineers (\$63,341 per year) obtained from the Office of Personal Management 2009 Salary Table; and \$15.53 per hour for SEE employees, with a 1.6 multiplier for overhead applied to both, yielding \$40,538 and Based on the 2006 GS pay schedule, EPA estimates an hourly \$34.35 for the FTE, then multiplies the hourly rates by the standard government benefits multiplication factor of 1.6, at a cost of \$45,728, and a cost of \$9,939 for the SEE; \$106,000 is estimated for the contractor. The contractor estimate is based upon the work assignment rather than an estimate of hours. An estimated total agency cost of \$161,667 per year is therefore allocated to imports activities. These activities include both on-road imports (this ICR) and nonroad imports (ICR 1723; OMB 2060-0320). An estimated 90% of these activities currently involve on-road imports; consequently, \$145,500 is the estimate for the agency cost for purposes of this ICR.

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

In the previous renewal we estimated that 12,000 Form 1s are submitted annually, averaging one respondent per form, and 352 Form 8s from five ICIs, based on a hand

count of Form 8s received in 2005 and 2006, plus an estimate based on actual and projected imports from one high-volume importer covering four original production years. The total number of responses was therefore estimated as 12,352. The estimated number of respondents was 12,005.

Both estimates are approximate and variable. For Form 1, our information is that Customs does not require every importer subject to the regulations at 19 CFR 12.73 to fill out the form; furthermore, the forms that are forwarded to us by Customs or by importers may not represent every form that is filled out. For Form 8, the number of ICIs is small, the number of engine families certified is small, and the number of vehicle imports within an engine family can vary widely. All these factors add up to produce significant "small number fluctuations". In 2005 there were 21 ICI families, including one high-volume importer that greatly multiplied the number of FTP tests employed. In 2008 there were 10 families, and without the high-volume importer. Consequently, to insure that EPA has the authority to accommodate the possible level of forms and tests needed under the collection authorization, we have retained the numbers of forms and tests from the previous renewal.

For each engine family, one imported vehicle is used for certification testing; therefore, while the forms count does not decrease, the testing responses is decreased by the number of import engine families. For model year 2005, 21 ICI engine families were certified; the count of 300 regular ICIs was reduced by 11 to total 289 vehicles subject to post-certification testing; every third vehicle results in an estimate of 96 tests; the total of 52 mod & test vehicles was reduced by 10 certification vehicles; the remaining 42 are subject to tests.

**(e) Bottom Line Burden Hours and Cost**

**(i) Respondent Tally**

Respondents	12,005
Responses	12,352
Burden Hours	9,350
Labor Cost	\$370,803
Operating Cost	\$90,894
Capital Cost	\$515,200
Capital Cost (Annualized, discounted)	\$73,353
Total (Annualized)	\$535,050

**(ii) Agency Tally**

Employees	2
Employee Labor Cost	\$50,100
Contract Labor Cost	\$95,400
Total Cost	\$145,500

## **(f) Reasons For Change In Burden**

This ICR follows the burden hours assumptions of the previous renewal for filling out the forms themselves, as well as the testing cost elements. The previous Supporting Statement and Federal Register notices reported depreciated capital costs consistent with the treatment in all other ICRs dealing with similar testing costs, but the authorized burden requested was mistakenly based on un-depreciated capital costs; correcting this results in a large reduction in the request without a change in the underlying program. Other changes in burden reflect minor improvements to the hour and cost estimates for these elements to reflect information obtained for similar elements in intervening ICRs. This has resulted in an increase in O&M costs, a decrease in capital costs, and a decrease in hours associated with FTP tests. The agency and importer labor costs have been updated with more recent cost figures for government and industry. The agency contract cost for the imports program is down over \$50,000 from the previous report.

## **(g) BURDEN STATEMENT**

Public reporting burden for this collection is estimated to average 45.4 minutes per response. 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-2009-0982. Submit any comments related to the ICR for this rule to EPA and OMB. Submit your comments, identified by Docket ID No. EPA-HQ-OAR-2009-0982, by one of the following methods:

www.regulations.gov: Follow the on-line instructions for submitting comments.

Fax: (202) 566-1741.

Mail: Environmental Protection Agency, EPA Docket Center (EPA/DC), Air and Radiation Docket, Mail Code 6102T, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460, Attention Docket ID No. EPA-HQ-OAR-2009-0982. In addition, please mail a copy of your comments on the information collection

provisions to the Office of Information and Regulatory Affairs, Office of Management and Budget (OMB), Attn: Desk Officer for EPA, 725 7th St. NW., Washington, DC 20503.

Hand Delivery: Docket Center, (EPA/DC) EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC., Attention Docket ID No. EPA-HQ-OAR-2009-0982. Such deliveries are only accepted during the Docket’s normal hours of operation, and special arrangements should be made for deliveries of boxed information

Docket ID Number EPA-HQ-OAR-2009-0982, is available for public viewing at the Air and Radiation Docket in the EPA Docket center (EPA/DC), EPA West, Room B102, 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 also (202) 566-1744. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov).

**Table 1: Annual Respondent Burden and Cost --Information Requirements for Importation of Nonconforming Vehicles (40CFR Part 85, Subparts P and R) (Renewal)**

Burden Item	Number Activities	Hours per Activity	Total Hours	Labor
Filing				
Form 3520-1	12,000	0.5	6,000	\$183,000

Form 3520-8	352	0.5	176	\$10,630
Testing				
Form 3520-8				
Regular ICI	96	23	2,208	\$123,251
Mod and Test	42	23	966	\$53,922
Total	12,352	0.5	9350	\$370,803