SUPPORTING STATEMENT ENVIRONMENTAL PROTECTION AGENCY

NSPS for Stationary Source Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Stationary Source Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII) (Renewal), EPA ICR Number 2196.04, OMB Control Number 2060-0590

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Stationary Source Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII) were proposed on July 11, 2005, promulgated on July 11, 2006, and amended on June, 8, 2011. These regulations apply to stationary compression ignition (CI) internal combustion engines (ICE). The standards apply to stationary sources whose construction, reconstruction, or modification begins after a standard for those sources is proposed. This information is being collected to assure compliance with 40 CFR part 60, subpart III.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Based on our consultations with industry representatives, there is an average of one affected facilities at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 206,370 respondents per year will be subject to the standard, and 40 additional respondents per year will become subject to the standard.

The Office of Management and Budget (OMB) approved the currently active Information Collection Request (ICR) with the following "Terms of Clearance (TOC)":

Prior to resubmission of this information collection for renewal, the Agency should reassess estimates of burden taking into account recent experience with the fully implemented program.

To address these terms of clearance, EPA consulted with industry experts on the burden estimates presented in the current ICR and incorporated any comments received.

All of the CI ICE units in the United States are owned and operated by the CI ICE industry (the "Affected Public"). These facilities in the United States are owned by either industry, state, local, tribal government. The burden to the "Affected Public" is listed below in Table 1: Annual Respondent Burden and Cost – NSPS for Stationary Source Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII) (Renewal). The burden to the "Federal Government" is attributed entirely to work performed by either Federal employees or government contractors; this burden may be found below in Table 2: Average Annual EPA Burden and Cost – NSPS for Stationary Source Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

... application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated. Section 111(a)(l).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

In the Administrator's judgment, emissions from CI ICE engines cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart IIII.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which where promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings. Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, and leaks are being detected and repaired and the standard is being met. The performance test may also be observed.

The required annual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

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

The requested recordkeeping and reporting are required under 40 CFR part 60, subpart IIII.

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exists.

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

An announcement of a public comment period for the renewal of this ICR was published in the <u>Federal Register</u> (76 <u>FR</u> 26900) on May 9, 2011. No comments were received on the burden published in the <u>Federal Register</u>.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Online Tracking Information System (OTIS) which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of all compliance data. The growth rate for the industry is based on

our consultations with the Agency's internal industry experts. Approximately 206,410 respondents will be subject to the standard over the three year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. During the development of the current ICR, we contacted: 1) the Engine Manufacturers Association (EMA), at (312) 929-1970; and 2) Cummins Incorporated, at (800) 343-7357.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first <u>Federal Register</u> notice.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR part 1320, section 1320.5.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 <u>FR</u> 36902, September 1, 1976; amended by 43 <u>FR</u> 40000, September 8, 1978; 43 <u>FR</u> 42251, September 20, 1978; 44 <u>FR</u> 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are stationary source

compression ignition internal combustion engines. The Standard Industrial Classification (SIC) codes for the respondents affected by the standard and the corresponding North American Industry Classification System (NAICS) codes are listed below for stationary source compression ignition internal combustion engines.

Standard (40 CFR, Part 60, Subpart IIII)	SIC Codes	NAICS Codes
Electric Power Generation, Transmission, or Distribution	4911, 4931, 4939	2211
Medical and Surgical Hospitals	8062, 8069	622110
Motor and Generator Manufacturing	3621, 7694	335312
Pump and Compressor Manufacturing	3561, 3743	33391
Welding and Soldering Equipment Manufacturing	3548, 3699	333992

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by NSPS for Stationary Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII).

A source must make the following reports:

Notifications							
Initial notification requirements for owners/operators of non-	60.7(a)(1), 60.4214(a)(1)						
emergency stationary CI ICE greater than 3,000 HP; non-							
emergency stationary CI ICE with a displacement of greater than							
10 liters per cylinder; and non-emergency pre 2007 model year							
stationary CI ICE greater than 175 HP that are not certified							

A source must keep the following records:

Recordkeeping	
Maintain records of notifications and maintenance conducted on the engine for owners/operators of non-emergency stationary CI ICE greater than 3,000 HP; non-emergency stationary CI ICE with a displacement of greater than 10 liters per cylinder; and non-emergency pre-2007 model year stationary CI ICE greater than 175 HP that are not certified.	60.4214(a)(2)
Maintain records of the hours of operation spent for emergency stationary CI ICE and the reason the engine was in operation during that time.	60.4214(b)

Recordkeeping	
Maintain records of any corrective action taken after the	
backpressure monitor has notified the owner operator that the high	60 404 46 >
backpressure limit of the engine is approached for stationary CI	60.4214(c)
ICE equipped with DPF (no burden is estimated for this	
requirement since DPF is not required until the year 2011).	

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities

Read instructions.

Perform initial performance test, Reference Methods, 1, 1A, 3, 3A, 3B, 4, 5, 7E tests, and repeat performance tests if necessary.

Write the notifications and reports listed above.

Enter information required to be recorded above.

Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.

Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.

Develop, acquire, install, and utilize technology and systems for the purpose of 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.

Transmit, or otherwise disclose the information.

Currently sources are using monitoring and reporting equipment that provide parameter data in an automated way e.g., continuous parameter monitoring system. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly

reduced the burden associated with monitoring and recordkeeping.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities

Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.

Audit facility records.

Input, analyze, and maintain data in the Online Tracking Information System (OTIS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The annual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into OTIS which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the OTIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for two years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations

and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost - NSPS for Stationary Source Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 below documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Wherever appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The 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.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these record-keeping and reporting requirements is estimated to be 193,707 (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial \$121.42 (\$57.82+ 110%)
Technical \$99.14 (\$47.21 + 110%)
Clerical \$49.81 (\$23.72 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2011, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs									
(A)	(B)	(C)	(D)	(E)	(F)	(G)			
Continuous	Capital/	Number of	Total	Annual O&M	Number of	Total			
Monitoring Device	Startup Cost	New	Capital/	Costs for One	Respondents	O&M,			
	for One	Respondents	Startup Cost	Respondent ¹	with O&M	(E X F)			
	Respondent		(B X C) ¹						
Certification/	¢0	0	¢ο	¢20.40	F 000	#1 <i>CC</i> 002			
Durability Testing	\$0	0	\$0	\$28.40	5,880	\$166,992			
Selective Enforcement Audits	\$0	0	\$0	\$375.50	200	\$75,100			
			\$0			\$242,092			

¹Capital costs and additional O&M costs will be incurred as a result of the June 2011 amendment. However, these costs are not expected to be incurred until the amendment is fully implemented in 2018.

The total capital/startup costs for this ICR are zero. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$242,092. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$242,092. These are recordkeeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$18,139.

This cost is based on the average hourly labor rate as follows:

Managerial \$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical \$46.21 (GS-12, Step 1, \$28.88 + 60%)
Clerical \$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2011 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost - NSPS for Stationary Source Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 206,370 existing respondents will be subject to the standard. It is estimated that an additional 40 respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 206,410 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR.

Number of Respondents									
	(A)	(B)	(C)	(D)	(E)				
	Number of	Number of	Number of Existing	Number of Existing	Number of				
Year	New	Existing	Respondents That	Respondents That	Respondents				
	Respondents 1	Respondents	Keep Records But Do	Are Also New	(E=A+B+C-D)				
			Not Submit Reports	Respondents					
1	40	235	206,095	0	206,370				
2	40	235	206,135	0	206,410				
3	40	235	206,175	0	206,450				
Average	40	235	206,135	0	206,410				

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 206,410.

The total number of annual responses per year is calculated using the following table:

Total Annual Responses									
(A)									
Information Collection Activity	Number of	Number	Number of	Total					
	Respondents	of	Existing	Annual					
		Responses	Respondents That	Responses					
			Keep Records But	E=(BxC)+D					
			Do Not Submit						
			Reports						
Notification for non-emergency stationary CI ICE >3,000 hp, prime	32	1	0	32					
Notification for non-emergency stationary CI ICE with a displacement >10 l/cyl, prime	8	1	0	8					
Non-emergency operation	206,410	1	0	206,410					
			Total	206,450					

The number of Total Annual Responses is 206,450.

The total annual labor costs are \$18,560,917. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Stationary Source Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 193,707, at a cost of \$18,560,917. Details regarding these estimates may be found in Table 1:Annual Respondent Burden and Cost - NSPS for Stationary Source Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average one hour per response.

The total annual capital/startup and O&M costs to the regulated entity are \$242,092. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 403 labor hours at a cost of \$18,139. See below Table 2: Average Annual EPA Burden and Cost - NSPS for Stationary Source Compression Ignition Internal Combustion Engines (40 CFR Part

60, Subpart IIII) (Renewal).

6(f) Reasons for Change in Burden

There is an adjustment increase in the total estimated burden hours and a decrease in the total estimated cost for the respondents as currently identified in the OMB Inventory of Approved Burdens. This is not due to any program changes. The increase in burden hours reflects a growth in the respondent universe since the last ICR renewal. The decrease in cost is due to a mathematical error that has been corrected since the last ICR.

There is an adjustment increase in the total estimated burden hours and costs for the Agency as currently identified in the OMB Inventory of Approved Burdens. The increase reflects a mathematical correction in the burden hour calculation and an adjustment in labor rates. This ICR uses updated labor rates in estimating the burden costs for all labor categories.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average one hour 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 valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 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-OECA-2011-0264. An electronic version of the public docket is available at http://www.regulations.gov/ which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the 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 in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. 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 docket center is (202) 566-1752. Also, you can send comments to the Office of

Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2011-0264 and OMB Control Number 2060-0590 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

Table 1: Annual Respondent Burden and Cost – NSPS for Stationary Source Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent	(C) Person hours per respondent per year	(D) Respondents per year ^a	(E) Technical person- hours per year	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year	(H) Total Cost Per year ^b
		per year	(C=AxB)		(E=CxD)	(2.1000)	(Ex0.1)	
1. Applications	N/A							
A. Certification for stationary use								
- Certification application ^c	44	1	44	35	1,540	77	154	\$169,695.68
- Recordkeeping	4.4	1	4.4	154	677.6	33.88	67.76	\$74,666.10
- Certificate/durability testing ^d	168	1	168	35	5,880	294	588	\$647,928.96
 Selective enforcement audits 	115	1	115	1	115	5.75	11.5	\$12,672.08
- Defect reporting ^e	125	1	125	4	500	25	50	\$55,096.00
B. Certification for stationary/non-road use	1	1	1	200	200	10	20	\$22,038.40
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions ^f	1	1	1	40	40	2	4	\$4,407.68
B. Required activities	See 3D							
C. Gather existing information	See 3D							
D. Write report								
Initial notification								
>3,000 hp, prime ^g	2	1	2	32	64	3.2	6.4	\$7,052.29
>10 l/cyl, prime ^h	2	1	2	8	16	8.0	1.6	\$1,763.07
Pre-2007, not certified, prime, >175 hp	N/A							
Subtotal for Reporting Requirements						10,387		
4. Recordkeeping requirements								
A. Read instructions ⁱ	1	1	1	56,204	56,204	2,810.2	5,620.4	\$6,193,231.17
B. Train personnel	N/A							
C. Recording CDPF corrective action	N/A							
D. Recording hours in non-emergency operation ^j	0.5	1	0.5	206,410	103,205	5,160.25	10,320.5	\$11,372,365.36
Subtotal for Recordkeeping Requirements						183,320	<u> </u>	
TOTAL LABOR BURDEN AND COST						•		
(rounded)						193,707		\$18,560,917

Assumptions:

- ^a We have assumed that there are 206,410 sources currently subject to the regulations, and it is estimated that 40 new sources are expected each year over the next three years.
- ^b This ICR uses the following labor rates: \$121.42 per hour for Executive, Administrative, and Managerial labor; \$99.14 per hour for Technical labor, and \$49.81 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2011 "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- ^c We have assumed that it will take 44 hours for all affected facilities to complete the certification application.
- ^d We have assumed that it will take 168 hours for all affected facilities to complete the certificate/durability testing.
- ^e We have assumed that it will take 125 hours for all affected facilities to complete the defect report.
- ^f We have assumed that each of the 40 respondents will take one hour to read instructions.
- ^g We have assumed that 80 percent of the 40 affected facilities are required to write the >3,000 hp, prime report.
- ^h We have assumed that 20 percent of the 40 affected facilities will write the 10 l/cyl prime report.
- We have assumed that on average 56,204 of the 206,410 respondents will read rule instructions each year.
- ^j We have assumed that respondents are required to keep the records for the recording hours in non-emergency operation.

Table 2: Average Annual EPA Burden and Cost – NSPS for Stationary Source Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ b
Report Review								
1. Initial notification of compliance ^c	2	1	2	40	80	4	8	\$4,145.96
2. Certification application								
A. Certification for stationary use ^d	2	1	2	35	70	3.5	7	\$3,627.72
B. Certification for stationary/non-road use ^e	1	1	1	200	200	10	20	\$10,364.90
TOTAL ANNUAL BURDEN AND COST (rounded)						403		\$18,139

Assumptions:

^a We have assumed that there are 206,410sources currently subject to the regulations, and it is estimated that 40 new sources are expected each year over the next three years.

This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 for Managerial (GS-13, Step 5, \$38.92 x 1.6), \$46.21 for Technical (GS-12, Step 1, \$28.88 x 1.6) and \$25.01Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) "2011 General Schedule" which excludes locality rates of pay.

^c We have assumed that each of the 40 affected facilities would have to review the initial notification of compliance report.

^d We have assumed that it will take 2 hours for each respondent to review the certification for stationary use report.

e We have assumed that it will take each of the respondent one hour one time per year to review the certification for stationary/non-road use.