

Table 2 - Annual Respondent Burden and Cost for Marine CI Category 3 Engine Certification & Special Provisions

Information Collection Activity	Hours and Cost per Application								Total Hours and Cost			
	Engineer \$65.20/hr	Manager \$102.50/hr	Legal \$100.69/hr	Clerical \$25.81/hr	Respondents hr/yr	Labor Cost/yr	Capital Startup Cost	O&M Cost, Annualized (1)	Applications/ Respondent (2)	Number of Respondents	Total hr/yr	Total Cost/yr
Review of regulations and guidance documents	18.0	9.0	10.0	1.0	38	\$3,128.81	\$0.00	\$15.00	1.0	4	152	12,575
Developing eng families TCMS/Gathering	15.0	3.0	1.0	1.0	20	\$1,412.00	\$0.00	\$0.00	1.0	4	80	5,648
emission data on test engines	30.0	14.0	0.0	14.0	58	\$3,752.34	\$0.00	\$0.00	1.0	2	116	7,505
Cert & Durability Testing(1)												
For exhaust certification								\$10,858.00	1.0	2	0	21,716
For IMO certification								\$3,619.33	1.0	2	0	7,239
Analyze data to determine compliance	6.0	4.0	1.0	1.0	12	\$927.70	\$0.00	\$0.00	1.0	2	24	1,855
Preparing and submitting certification application	2.0	0.5	1.0	1.0	5	\$308.15	\$0.00	\$6.00	1.0	2	9	628
Preparing and submitting "carry over" applications	1.0	0.5	0.0	2.0	4	\$168.07	\$0.00	\$3.00	1.5	2	11	513
Paying Certification Fee	0.5	0.5	0.0	0.5	3	\$96.76	\$0.00	\$1.00	1.25	4	15	489
Certification Fee (3)								\$563.00	1.25	4	0	2,815
Preparing and supporting running changes	3.0	2.0	1.0	2.0	8	\$552.91	\$0.00	\$6.00	3.25	4	104	7,266
Preparing and Submitting Annual Production Report	5.0	2.0	1.0	2.0	10	\$683.31	0	\$3	1.25	4	50	3,432
Prepare and submit request for special provisions, exemptions	8	0	0	0	8	\$521.60	\$0	\$10	0.6	1	5	\$319
Label engines	1	0	0	0	1	\$65.20	\$0	\$30	15.0	4	60	\$5,712
Store, file and maintain records	3.0	1.0	1.0	7.0	12	\$579.46	\$0.00	\$20.00	1.0	4	48	2,398
Total per respondent	92.5	36.5	16	31.5	178.0	\$ 12,196	0	varies	varies	N/A	N/A	N/A
Total for the industry	N/A	N/A	N/A	N/A	N/A	\$ 46,275	0	\$ 33,835	varies	354	673.3	\$ 80,109

(1) See section 6(b)ii for details.

(2) See section 6(d) for details.

(3) See section 6(b)(ii) for details.

Table 3 - Annual Respondent Burden and Cost - Marine CI Category 3 Production Line Testing Program												
Information Collection Activity	Hours and Cost per Engine Family								Total Hours and Cost			
	Engineer \$65.20/hr	Manager \$102.50/hr	Legal \$100.69/hr	Clerical \$25.81/hr	Respondents hr/yr	Labor Cost/yr	Capital Startup Cost	O&M Cost(1)	Frequency (2)	Number of Respondents	Total hr/yr	Total Cost/yr
Review of instructions and regulations	45	5	8	0	58	\$4,252.02	\$0.00	\$0.00	1.0	4	232	\$17,008.08
Training	8	0	0	0	9	\$521.60	\$0.00	\$40.00	1.0	4	36	\$2,246.40
Projecting testing needs and planning test schedules	11	1	0	1	13	\$845.51	\$0.00	\$20.00	1.0	4	52	\$3,462.04
Engine inspection	1	0	0	0	7	\$65.20	\$0.00	\$0.00	15.0	4	420	\$3,912.00
Testing								\$10,858.00	15.0	4	0	\$651,480.00
Data entry and analysis	8	0	0	1	9	\$547.41	\$0.00	\$30.00	15.0	4	540	\$34,644.60
Other tasks (test equipment calibration, engine repair, etc.)	4	0	0	0	64	\$260.80	\$0.00	\$100.00	15.0	4	3,840	\$21,648.00
Preparing and submitting report	8	1	1	2	12	\$776.41	\$0.00	\$5.00	2.8	4	132	\$8,595.51
Store, file and maintain records	2	0	0	3	6	\$207.83	\$0.00	\$50.00	1.0	4	24	\$1,031.32

Total per manufacturer	101	8	11	9	214	\$8,745.08	\$0.00	varies	varies	N/A	N/A	N/A
Total for the industry	N/A	N/A	N/A	N/A	N/A	\$84,252.95	\$0.00	\$659,775.00	N/A	179	5,276	744,028

(1) Includes phone calls and testing costs. See section 6(b)(iii) for details.

(2) Explanation of frequencies:

1.0 = One time task

2.8 = Estimated number of PLT reports submitted per manufacturer per year. While PLT reports are due quarterly for each engine family, most engine families do not have enough production to cover all quarters.

Table 4 - Annual Respondent Burden and Cost - Selective Enforcement Auditing (SEA) Program												
Information Collection Activity	Hours and Cost per Application									Total Hours and Cost		
	Engineer \$65.20/hr	Manager \$102.50/hr	Legal \$100.69/hr	Clerical \$25.81/hr	Respondent hr/yr	Labor Cost/yr	Capital Startup Cost	O&M Cost(1)	Frequency (2)	Number of Respondents (3)	Total hr/yr	Total Cost/yr
Provide Pre-audit information	20	10	2	5	37	\$2,659.43	\$0	\$0	0.3	2	22	\$1,596
Review of instructions and regulations	7	1	1	0	9	\$659.59	\$0	\$0	0.3	1	3	\$198
Training	3	1	0	0	4	\$298.10	\$0	\$32	0.3	1	1	\$99
Plan activities	16	0	0	0	16	\$1,043.20	\$0	\$32	0.3	1	5	\$323
Testing	8	0	0	0	8	\$521.60	\$0	\$10,858.00	0.3	1	2	\$3,414
Data entry and analysis	22	0	0	5	27	\$1,563.45	\$0	\$1	0.3	1	8	\$469
Preparing and submitting report	18	1	1	1	21	\$1,402.60	\$0	\$3	0.3	1	6	\$422
Store, file and maintain records	8	0	0	1	9	\$547.41	\$0	\$1	0.3	1	3	\$165
Total per manufacturer	95	5	2	8	131	\$7,114	\$0	varies	varies	N/A	N/A	N/A
Annualized totals = total for the industry	N/A	N/A	N/A	N/A	N/A	\$3,406	\$0	\$3,278	N/A	2	50	\$6,685

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

(2) Frequency: A frequency of 0.3 has been used to annualize the burden and costs over a 3-year period. Refer to Section 6(d)(ii) for further details.

(3) EPA estimates it will audit 1 manufacturer over the next 3 years. It might, however, request pre-audit information from more than one manufacturer.

Table 5 - Annual Respondent Burden and Cost - Vessel Owners, Operators & Engine Rebuilders												
Information Collection Activity	Hours and Cost per Application									Total Hours and Cost		
	Engineer \$65.20/hr	Manager \$102.50/hr	Legal \$100.69/hr	Clerical \$25.81/hr	Respondent hr/yr	Labor Cost/yr	Capital Startup Cost	O&M Cost(1)	Frequency (2)	# of Respondents (3)	Total hr/yr	Total Cost/yr
Review of instructions and regulations	3	1	1	0	5	\$398.79	\$0	\$10	1.0	192	960	\$78,488
Owners & Operators												
Inform EPA of malfunctions & other special events	4	1	1	2	8	\$515.61	\$0	\$10	1.0	187	1,496	\$98,289
Conduct Annual Records Review	10	3	3	5	21	\$1,390.62	\$0	\$100	1.0	187	3,927	\$278,746
Prepare and submit report	3	1	1	5	10	\$527.84	\$0	\$30	1.0	187	1,870	\$104,316
Owners, Ops & Rebuilders: Store, file and maintain records	15	5	5	30	55	\$2,768.25	\$0	\$50	1.0	192	10,560	\$541,104
Total per manufacturer	95	5	2	8	99	\$7,114	\$0	varies	varies	N/A	N/A	N/A
Annualized totals = total for the industry	N/A	N/A	N/A	N/A	N/A	\$1,063,243	\$0	\$37,700	N/A	192	18,813	\$1,100,943

(1) Includes CDs, photocopying, postage expenses, phone calls, and testing costs.

(2) Frequency: A frequency of 1 has been used to denote an annual event.

(3) EPA estimates it will audit 1 manufacturer over the next 3 years. It might, however, request pre-audit information from more than one manufacturer.

**Table 6 - Annual Agency Burden and Cost
Marine CI Category 3 Program**

Employee	Hours and Labor Cost						
	Level	Rate	Rate Increase by 1.6	Number of Employees	Full time hours	% of Time	Total hr/yr
Engineer	GS-13/6	\$55.46	\$79.55	1	2080	7.0%	145.6
Contracts/Compliance	GS-13/7	\$51.19	\$79.55	1	2080	1.5%	31.2
Attorney	GS-13/7	\$51.14	\$81.82	1	2080	1.0%	20.8
Managers	GS-15/1	\$59.30	\$94.78	1	2080	1.0%	20.8
SES-1	SES - 1	\$96.01	\$153.62	1	2080	0.5%	10.4
IT Support	GS-14/1	\$50.41	\$79.55	1	2080	1.0%	20.8
Contract Support							
Subtotal				6	N/A	N/A	250

O&M Costs	
Testing	(for one in-use test or confirmatory testing in three years, annualized)
Other	
SEE Support	
Contract Support - Compliance	
Contract Support - Certification	
	Subtotal:
	TOTAL:

Total Labor cost/yr
\$11,582
\$2,482
\$1,702
\$1,971
\$1,598
\$1,655
\$83,000
\$ 103,990

\$3,619
\$20,000
\$2,000
\$1,151
\$3,030
\$ 29,800

\$ 133,790

Table 7
Respondent Burden Tally

Program	Number of Respond.	Number of Activities	Total Hours Per Year	Total Labor Cost Per Year	Total Annual Capital Costs	Total Annual O&M Costs
Certification	4	13	673	46,275	-	33,835
PLT	4	9	5,276	84,253	-	659,775
SEAs	1	8	50	3,406	-	3,278
Owners, Ops & Rbldrs	192	5	18,813	1,063,243	-	37,700
Totals:	201	35	24,813	1,197,177	-	734,588

Hours per respondent: 123

Total Costs

80,109

744,028

6,685

1,100,943

1,931,765