Supporting Statement for

EPA Information Collection Request Number 2265.02

"Information Collection Activities Associated with the SmartWay Transport Partnership"

July 2014

Table of Contents

1 I	Identification of the Information Collection	4
1(a)	Title of the Information Collection	4
1(b)	Short Characterization/Abstract	4
2 1	Need for and Use of the Collection	7
2(a)	Need/Authority for the Collection	7
2(b)	Practical Utility/Users of the Data	8
3 1	Non-duplication, Consultations, and Other Collection Criteria	9
3(a)	Non-duplication	9
3(b)	Public Notice Required Prior to ICR Submission to OMB	9
3(c)	Consultations	9
3(d)	Effects of Less Frequent Collection	10
3(e)	General Guidelines	11
3(f)	Confidentiality	11
3(g)	Sensitive Questions	11
4	The Respondents and the Information Requested	11
4(a)	Respondents and NAICS Codes	11
Ta	ble 4.1	11
Lis	st of NAICS codes for SmartWay Partners	11
4(b)	Information Requested	12
4(b)(i	i) Data Items	13
	ii)Respondent Activities	
5 I	Information Collection: Agency Activities, Collection Methodology, and	17
Infor	mation Management	17
5(a)	Agency Activities	17
5(b)	Collection Methodology and Management	
5(c)	Small Entity Flexibility	18
5(d)	Collection Schedule	18
• •	Estimating the Burden and Cost of the Collection	19
6(a)	Estimating Respondent Burden	
6(b)	Estimating Respondent Costs	
` ′	i) Estimating Labor Costs	

6(b)(i	i) Estimating Capital and Operations and Maintenance (O&M) Costs	19
6(c) I	Estimating Agency Burden and Costs	19
6(d)	Estimating the Respondent Universe and Total Burden and Costs	20
Tab	ole 6.1 – Average Annual Respondent SmartWay Partners	22
	Bottom Line Burden Hours and Cost Tables	
6(e)(i)) Respondent Tally	24
Tab	ole 6.2 – Total Estimated Annual Respondent Burden and Cost Summary	24
)(i) Agency Tally	
	ole 6.3 – Total Estimated Annual Agency Burden and Cost	
6(f)	Reasons for Change in Burden	
6(g)	Burden Statement	
(0)	nibit 1 – Estimated Annual Respondent Burden and Cost	

1 Identification of the Information Collection

1(a) Title of the Information Collection

This Information Collection Request (ICR) is entitled "Information Collection Activities Associated with SmartWay Transport Partnership," EPA ICR number 2265.02, OMB Control Number 2060-0663.

1(b) Short Characterization/Abstract

The U.S. Environmental Protection Agency ("EPA") created the SmartWay Transport Partnership ("SmartWay") to help businesses and individuals protect the environment, improve air quality, and maximize the energy efficiency of their transportation and logistics management choices. SmartWay focuses on increasing efficiency and lowering greenhouse gases and air pollution generated by goods movement. EPA encourages businesses that transport and move goods to adopt energy-efficient strategies and technologies that reduce fuel use, air pollution, and energy costs.

EPA administers a streamlined reporting process for organizations that join SmartWay and has created incentives for improvement (e.g., SmartWay Excellence Awards Program). EPA also makes reporting tools and other resources available on the Internet to help SmartWay partners evaluate their environmental performance and the value of investing in transportation management improvements.

This ICR examines the information collected under SmartWay from organizations active in the transportation sector. Sections 1 through 5 of this supporting statement describe the collections (in terms of the need and utility of the data collected). These sections also outline Respondent and Agency activities. In Section 6, EPA estimates the annual hour and cost burden to Respondents and the Agency as a result of the data collections.

SMARTWAY TRANSPORT PARTNERSHIP AND THE TRANSPORTATION SECTOR

SmartWay consists of the following participant groups:

Carrier Partners are businesses that provide freight transport services, and
that own and/or operate vehicles used in goods movement and related
transportation-based assets. These businesses include trucking, railroad,
commercial and retail businesses, independent truck owners, inland marine,
and similar organizations. SmartWay may in the future expand to other types
of freight modes including air and ocean-going vessels (OGV).

SmartWay partners commit to improve their fuel efficiency and environmental performance as a condition for participating in the Partnership. Carriers that join SmartWay agree to annually measure their performance using a Microsoft Excel-based reporting tool ("reporting tool") provided by EPA. This reporting tool may be downloaded from the EPA's SmartWay website.

Shipper and Logistics Management Partners consist of manufacturers,

retailers, logistics, and supply chain management companies that hire or contract with transportation providers (e.g., carriers) to move their goods. SmartWay shipper and logistics management partners agree to annually assess the proportion of goods dispatched with SmartWay carriers. They report their carbon emissions using a reporting tool similar to that used by carriers. Shippers and logistics companies agree to ship an increasing percentage of their goods with SmartWay carriers, and to lower carbon emissions from their facility transportation operations as conditions for participating in SmartWay.

Affiliates are both private and non-profit transportation-based organizations
and companies, including trade associations, state and local governments,
leasing companies, retail truck equipment dealers, and other groups that
encourage the transportation sector to integrate pollution controls and energysaving strategies into their business operations.

This ICR covers the following reporting activities associated with Partner participation in the SmartWay program:

SmartWay Partnership Annual Agreement

An organization joins SmartWay when it submits a reporting tool. This
reporting tool has an embedded SmartWay Partnership Annual Agreement
("Annual Agreement"). This Annual Agreement states the general terms under
which the Partner agrees to participate and what EPA will commit to do in
return for the organization's participation.

For example, Partners commit to measure and report to EPA on an annual basis the environmental performance of their fleet(s) using the EPA's reporting tool. In return, EPA commits to provide companies with industry-wide performance benchmark data as it becomes available to the EPA.

Partners must check a box at the bottom of the Annual Agreement indicating that they understand and agree to Program participation terms before they can move into the reporting tool to enter their data.

SmartWay Annual Reporting Tool

Upon joining SmartWay, carriers, shippers, and logistics management companies agree to annually measure emissions generated by their transportation-related activities. To do so, partners collect data on their freight management business, such as transportation mode, fleet size, fuel use, equipment type, number of miles traveled, payload and related factors. They then input this information into the reporting tool and submit it electronically to the EPA. EPA reviews, approves, and uploads the completed reporting tool into its Customer Relationship Management (CRM) partner account database ("Partner database").

EPA's Partner database calculates the uploaded information to operate a company's fuel consumption rates and emission outputs (CO₂, nitrogen oxides, and particulate matter). The outcomes in the reporting tool enable Partners to conduct analyses that help them optimize the efficiencies of their transportation management activities through the SmartWay program. These outcomes can

also be used to benchmark and improve Partner sustainability performance.

After initially submitting data into the reporting tool, Partners are asked to annually update their transportation management activities using the reporting tool. These annual reporting tool updates help Partners to track fuel economy improvements and monitor the effectiveness of their actions to reduce emissions. EPA uses these annual updates to monitor the progress of the SmartWay program.

SmartWay Partnership Affiliate Agreement

- SmartWay Affiliates ("Affiliates") are organizations that encourage their members or customers to participate in SmartWay. Affiliates commit also to promoting SmartWay within the freight transport industry. To become an Affiliate, the organization must complete and submit an Affiliate Agreement to the EPA.
- In return, EPA agrees to do the following:
 - o Educate SmartWay Partners about the Affiliates' involvement;
 - O Publicize Affiliates' participation through SmartWay events, the website, and listing in educational and promotional materials;
 - O Provide marketing materials to Affiliates to assist them in promoting SmartWay;
 - O Provide EPA representatives as requested and as available to speak about SmartWay at Affiliate meetings and conferences;
 - O Provide technical assistance as needed to help Affiliates achieve Program goals.

SmartWay Excellence Awards

Partners may be considered for a SmartWay Excellence Award and gain
public recognition for their environmental performance and success in
reducing fuel use. Emissions data, including updates that reflect transportation
management improvements, may be used by Partners to demonstrate their
progress in reducing fuel use and air emissions. As part of the award process,
SmartWay partners may also provide greater detail on specific actions they
have taken to lessen the environmental impacts of their transportation-related
business activities.

Program Evaluation

 Through workshops, webinars, conferences, and other interactive venues, SmartWay provides opportunities for Partners, other industry representatives, and consumers to provide input on their experience with SmartWay. This includes input on the Program's effectiveness at helping Partners to assess and improve the environmental performance of their freight transport operations, the usability of SmartWay-provided tools and information, and their awareness of the SmartWay program.

SmartWay Tractor & Trailer Program

- EPA-designated SmartWay tractors and trailers are a newer generation of long-haul rigs equipped with cleaner, fuel-saving features that meet voluntary equipment specifications. Model year 2007 and newer SmartWay-designated tractors and new and retrofitted trailers can achieve fuel savings of 10 to 20 percent and lower greenhouse gas emissions. These designated vehicles also can significantly reduce oxides of nitrogen, particulate matter, and other air pollutants.
- SmartWay-registered for-hire carriers, owner-operators, manufacturers and retailers with private fleets that own, lease and/or operate SmartWay tractors or trailers are eligible to label the exterior of their SmartWay-verified tractors or trailers with the SmartWay logo. These SmartWay partners may submit a onetime application to EPA to obtain the SmartWay-designated logo.
- EPA may re-evaluate designation requirements over time to reflect changes in the fleet mix.

2 Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA's Office of Transportation and Air Quality (OTAQ) established SmartWay under directives outlined in Subtitle D of the Energy Policy Act of 2005 which calls on EPA to assess the energy and air quality impacts of activities within the freight industry. These activities include long-duration truck idling, the development and promotion of strategies for reducing idling, fuel consumption, and negative air quality effects. SmartWay's objectives also are consistent with the Clean Air Act, the Federal Technology Transfer Act, and other laws that authorize and support research, training, and air pollutant control activities.

SmartWay is a key program in the Agency's strategic approach to reducing climate emissions. SmartWay supports and complements the Agency's climate policy agenda. SmartWay also supports OTAQ's mission to protect the environment from transportation-based activities through the advancement of air pollution control equipment and technologies, clean fuels, and innovative mobility and logistics management strategies.

Information collected through SmartWay assists OTAQ in evaluating the challenges the freight industry is managing as the industry seeks to maintain its economic viability, conserve fuel, reduce idling activity, lower CO₂ outputs, and improve its overall environmental performance (through the application of technology-based controls, efficient logistics management strategies and related approaches). SmartWay also provides opportunities for EPA and industry to cooperate and collectively execute strategies that can help improve the transportation industry's financial and environmental performance, both in the short term and the long term.

Data gathered through SmartWay contribute to OTAQ's goals to reduce transportation-based emissions, improve transportation efficiencies, and protect human health and the environment. SmartWay program data also is critical to monitoring and measuring the success of SmartWay as a public/private partnership, both in terms of collaboration and as a tool for reducing fuel consumption and air pollutants, including CO₂, NOx, and particulate matter.

2(b) Practical Utility/Users of the Data

SmartWay Partnership Annual Agreement and Reporting Tools

Information collected through the SmartWay program has a broad range of practical and useful applications. The Annual Agreement is needed to secure basic contact information and to ensure an organization's commitment to SmartWay's energy and environmental goals. Data submitted through the reporting tool assist Partners in quantitatively assessing the fuel consumed and air pollutant emissions generated by their transportation and freight activities. Outputs from the reporting tool help organizations establish benchmarks, identify strategies, and set future goals for conserving fuel and reducing greenhouse gas, nitrogen oxide and particulate matter emissions.

By allowing carriers to compare their efficiency and environmental performance in the online Carrier Performance Ranking with competing carriers, SmartWay drives continued improvements across industry. Superior performance in various Partner categories is also recognized through the SmartWay Excellence Awards.

Completing and submitting an updated annual reporting tool helps Partners monitor their progress, determine if their goals are being met, and adjust their goals if necessary. These updates also can provide Partners with valuable information on the environmental and economic benefits of applying the options available for modifying their freight transport methods (e.g. purchase idle reduction equipment, modify pickup and delivery schedules, adopt intermodal options, etc.).

OTAQ uses outputs from the SmartWay reporting tools and its Partner database to evaluate progress toward its goals for reducing transportation-based emissions. Information contained in the SmartWay reporting tools and Partner database also is used to select potential candidates for a SmartWay Excellence Award. The data are considered by EPA as part of its Excellence Awards program in conjunction with other information that partners may provide to demonstrate the progress they are making to meet the environmental commitments they made when joining SmartWay.

SmartWay Partnership Affiliate Agreement

The Affiliate Agreement is needed to help EPA track those supporters who do not qualify as SmartWay partners (e.g., non-profit organizations, tractor/trailer dealerships). This Affiliate Agreement is a one-time submittal. Once the Partner has submitted the Affiliate Agreement, and EPA approves them into the Program as an Affiliate, the Affiliate does not have to submit another Affiliate Agreement.

SmartWay Excellence Awards

The SmartWay Excellence awards program provides EPA an important opportunity to publicly recognize the collective efforts of industry and individual organizations to conserve energy and improve air quality. This recognition serves as an important incentive, encouraging continuous improvement among existing partners, highlighting their success within industry among peers, and helping to strengthen and build the partnership.

Program Evaluation

Periodic feedback and evaluation on the effectiveness of the SmartWay program and recognition of SmartWay as a brand from program Partners, and other representatives active in the transportation sector will enable EPA to make program changes as may be warranted. This feedback and evaluation also enables EPA to ensure the value, usefulness, and effectiveness of the Program.

SmartWay Tractor & Trailer Program

SmartWay-registered partners in good standing that own or lease tractors or trailers designated under the SmartWay Verification Program report the number of SmartWay-designated tractors or trailers to SmartWay when they apply to obtain the SmartWay tractor or trailer label. SmartWay uses this information to evaluate progress toward its goals for reducing transportation-based emissions.

Obtaining the number of SmartWay-designated tractors that are in use by SmartWay partners also helps Partners to track the progress they are making to meet their environmental goals and to demonstrate their commitment to using environmentally-friendly vehicle technologies.

3 Non-duplication, Consultations, and Other Collection Criteria

3(a) Non-duplication

The information collected under this ICR is not collected by any other EPA office or any other federal agency. Therefore, there is no potential for duplication with other federal collections.

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

In compliance with the 1995 Paperwork Reduction Act (PRA), any agency developing a non-rule related ICR must solicit public comments for a 60-day period prior to submitting the ICR to OMB. These comments, which are used partly to determine realistic burden estimates for Respondents, must be considered when completing the final Supporting Statement that is submitted to OMB.

The announcement of a public comment period for this renewal ICR was made in the <u>Federal Register</u> on February 6, 2014 (79 FR 7181), under Docket ID Number **EPA-HQ-OAR-2007-0482**. No comments were received.

3(c) Consultations

Because EPA works closely with its SmartWay partners, the Agency already has a basis for determining the time needed to carry out its information collection. Therefore EPA relied primarily on the expertise of Agency staff in developing the ICR's hour and cost assumptions for this renewal.

In addition, the Agency accessed its Partner database and associated documentation to estimate the number of Respondents and activities. The Agency's data sources are kept up to date based on Partner submittals (e.g., Partner annual tool submittals) and equipment logo applications.

3(d) Effects of Less Frequent Collection

SmartWay Partnership Annual Agreement and Reporting Tool

The Annual Agreement is submitted to the EPA and is part of the reporting tool; less frequent data collection would reduce the value of the data in informing industry decisions, and decrease Program effectiveness.

A Partner submits the annual reporting tool upon joining SmartWay and annually thereafter, for as long as an organization remains a SmartWay partner. First-year system outputs are used by Partners as a baseline to establish energy and emission reduction goals in the future.

Submitting annual reporting tool updates are necessary for SmartWay partners to determine the effectiveness of their actions to reduce emissions and energy use. Likewise for EPA, collecting and storing the reporting tool data annually ensures that the Agency is able to establish quantitative information on the Program's progress in reaching SmartWay's emissions and fuel reduction goals.

Submitting a reporting tool to EPA less frequently than annually would prevent EPA and its SmartWay partners from tracking and assessing the progress of Partners and the Program as a whole. It also would make it difficult for Partners to modify their strategies to reduce energy use and emissions, as needed, to meet their goals. Annual reporting tool updates are necessary for EPA and its SmartWay partners to effectively work toward their shared energy and environmental goals. It would also require significant changes to the Program's reporting tools and structure.

The updated data also are important to EPA when assessing Partner performance as part of the SmartWay Excellence Awards program. The Excellence Awards are an important incentive and encourage Partners to implement effective emission-reduction strategies that help conserve energy, reduce greenhouse gas emissions, and improve air quality. This recognition is given on an annual basis.

SmartWay Partnership Affiliate Agreement

The Affiliate Agreement is needed to help EPA track SmartWay supporters who do not qualify as SmartWay partners (e.g., non-profit organizations, tractor/trailer dealerships). This is a one-time submittal. Once the organization has submitted the Affiliate Agreement, and EPA approves them into the Program as an Affiliate, the Affiliate will not have to complete another Affiliate Agreement. Submitting the one-time Affiliate Agreement is necessary for EPA and its Affiliates to effectively work toward their shared energy and environmental goals.

Program Evaluation

Providing sufficient opportunities for SmartWay partners and transportation industry

professionals to provide input to EPA on the effectiveness of SmartWay is necessary to monitor and implement program changes, as needed, in a timely manner.

SmartWay Tractor & Trailer Program

SmartWay partners in good standing that purchase or lease EPA-designated SmartWay tractors and trailers can submit a one-time application to apply the SmartWay logo to the exterior of their EPA-designated SmartWay equipment. Submitting the one-time application is necessary for EPA and Respondents to effectively work toward their shared energy and environmental goals.

3(e) General Guidelines

Information collections performed under this clearance will follow all of OMB's General Guidelines regarding Federal data collection.

3(f) Confidentiality

Participation in SmartWay is voluntary and may be terminated by participants or EPA at any time. If a claim of confidential business information (CBI) is asserted, EPA will manage that information in accordance with EPA's provisions on confidentiality. 40 CFR Part 2, Subpart B establishes EPA's general policy on the public disclosure of information and procedures for handling CBI claims.

3(g) Sensitive Questions

No questions of a sensitive nature are asked of SmartWay participants ("Respondent(s)").

4 The Respondents and the Information Requested

4(a) Respondents and NAICS Codes

Table 4.1 lists selected North American Industrial Classification System (NAICS) codes and the primary industry sectors associated with those codes. These industry sectors may be affected by SmartWay-related information collections covered under this ICR.

Table 4.1 List of NAICS codes for SmartWay Partners

NAICS Code	Industry
421	Wholesale Trade, Durable Goods
422	Wholesale Trade, Nondurable Goods
4211	Motor Vehicle and Motor Vehicle Part and Supplies
42111	Automobile and Other Motor Vehicle Wholesalers
42112	Motor Vehicle Supplies and New Part Wholesalers
423	Wholesale Trade, Nondurable Goods
44-45	Retail Trade
48-49	Transportation and Warehousing

404	A in Transportation
481	Air Transportation
4811	Scheduled Air Transportation
481112	Scheduled Freight Air Transportation
4812	Nonscheduled Air Transportation
48121	Nonscheduled Air Transportation
481212	Nonscheduled Chartered Freight Air Transportation
481219	Other Nonscheduled Air Transportation
482	Rail Transportation
4821	Rail Transportation
48211	Rail Transportation
482111	Line-Haul Railroads
482112	Short-Line Railroads
483	Water Transportation
4831	Deep Sea, Coastal and Great Lakes Water Transportation
48311	Deep Sea, Coastal and Great Lakes Water Transportation
483111	Deep Sea Freight Transportation
483113	Coastal and Great Lakes Freight Transportation
4832	Inland Water Transportation
48321	Inland Water Transportation
483211	Inland Water Freight Transportation
484	Truck Transportation
4841	General Freight Trucking
48411	General Freight Trucking, Local
48412	General Freight Trucking, Long-Distance
484121	General Freight Trucking, Long-Distance, Truckload
484122	General Freight Trucking, Long-Distance, LTL
4842	Specialized Freight Trucking
488	Support Activities for Transportation
4881	Support Activities for Air Transportation
48811	Airport Operations
488119	Other Airport Operations
48819	Other Support Activities for Air Transportation
4882	Support Activities for Rail Transportation
48821	Support Activities for Rail Transportation
4883	Support Activities for Water Transportation
48831	Port and Harbor Operations
48832	Marine Cargo Handling
48833	Navigational Services to Shipping
48839	Other Support Activities for Water Transportation
4884	Support Activities for Road Transportation
4885	Freight Transportation Arrangement
48851	Freight Transportation Arrangement
4889	Other Support Activities for Transportation
48899	Other Support Activities for Transportation
488991	Packing and Crating
488999	All Other Support Activities for Transportation
4931	Warehousing and Storage Facilities
49311	General Warehousing and Storage Facilities
49312	Refrigerated Warehousing and Storage Facilities
49319	Other Warehousing and Storage Facilities

4(b) Information Requested

Respondents commit to conserve energy and emissions when they join SmartWay. The following describes the information that they submit as part of their participation with

4(b)(i) Data Items

SmartWay Partnership Annual Agreement

• A Respondent completes a reporting tool for its transportation mode (e.g., carrier, multi-modal, shipper) when it joins SmartWay. The Partnership Annual Agreement is embedded in the reporting tool. A completed Partnership Annual Agreement and reporting tool confirm that an organization has registered with SmartWay. It lists the commitments that both EPA and the Respondent assume by working together through the SmartWay Partnership. On average, EPA estimates that 0.66 hours are needed to thoroughly review, comprehend and approve the Partnership Annual Agreement. This could include some legal review.

The Partnership Annual Agreement includes the following information:

- Terms of the company's commitment,
- A statement confirming an understanding of the Annual Agreement, the importance of an accurate and true reporting tool submissions,
- General terms of the SmartWay Partnership, and
- Terms of EPA's commitment.

SmartWay Annual Reporting Tool

• The SmartWay annual reporting tool is a Microsoft Excel-based report that enables SmartWay partners to quantify the environmental performance of their transportation-based operations. SmartWay partners download the reporting tool from the SmartWay website (www.epa.gov/smartway) and enter their transportation data when they join SmartWay. They submit updated reporting tools annually thereafter. SmartWay provides tailored carrier and shipper reporting tools for different modes of moving goods. Available reporting tools include truck, rail, inland marine (barge), logistics, and multi-modal.

On average, EPA estimates that SmartWay partners will take 5.16 hours to gather, input, and review the data needed to successfully complete the reporting tool the first time.

Thereafter, annual reporting tool updates will take 2.66 hours to complete. These estimates include the time needed to review system outputs prior to sending them to EPA.

For carrier partners the reporting tool requires the following information:

 Contact information, including a responsible agent for the company, and an alternate; street and electronic addresses and phone numbers, and Information about the company, including data about its existing transportation equipment, such as the number of trucks employed; gallons of fuel used and miles traveled annually; average payload; pollution control equipment deployed and idling activity.

For shipper and logistics management Partners, the reporting tool requires the following information:

- Contact information, including a responsible agent for the company, an alternate; street and electronic addresses, and phone numbers,
- Information about the company's transportation activities, including carriers hired to transport goods; mode/s used to transport products; and freight facility operations.

Annual SmartWay Excellence Awards

• The Annual SmartWay Excellence Awards recognize outstanding achievements by Partners in the program. Data from the reporting tools and Partner database provide the basis for an award. Semi-finalists also provide additional information on the SmartWay Semi-Finalist Application, to be considered for an award. The SmartWay Semi-finalist Application is in Adobe Acrobat format, and it is submitted electronically, by fax, or by U.S. mail. On average, EPA estimates that organizations that provide this information take an estimated 3.25 hours to do so.

Additional information provided by a SmartWay Excellence Award Semi-Finalist includes:

- Efforts undertaken to educate its staff, customers, and the public about its participation in SmartWay, and
- Other activities supporting its participation as a SmartWay partner (e.g., a shipper may offer special assistance or incentives that help and/or encourage carriers to join SmartWay).

SmartWay Partnership Affiliate Agreement

 An organization that wishes to support SmartWay as an Affiliate completes the SmartWay Affiliate Agreement ("Affiliate Agreement") when it joins SmartWay. The Affiliate Agreement is in Adobe Acrobat format and is submitted electronically, by fax, or by U.S. mail.

A completed Affiliate Agreement lists the commitments that both EPA and the joining organization assume by working together through the SmartWay Partnership. On average, EPA estimates that 0.82 hours are needed to thoroughly review, comprehend and submit the Affiliate Agreement. This could include some legal review.

Partner Evaluation

• SmartWay may request feedback on the program and the tools it provides,

which would be expected to require no more than 15 minutes of a Respondent's time

SmartWay Tractor &-Trailer Program

- A SmartWay partner that wants to label the exterior of its tractors or trailers as
 "SmartWay Tractor" or "SmartWay Trailer" will complete and submit the
 SmartWay Equipment Checklist that may be downloaded from the EPA's
 SmartWay website. Completion and submission of the Equipment Checklist
 signifies that the Partner owns or operates the respective tractor and/or trailer
 that meet the SmartWay specifications.
- Data that the SmartWay partner submits in the SmartWay Equipment Checklist include:
 - O Name of the truck or trailer manufacturer,
 - O Name of the truck or trailer model/brand,
 - O The model year of the truck or trailer,
 - O Identification of SmartWay-verified technologies on the trucks (e.g., tires, idling control devices) and trailers (e.g., tires, aerodynamic equipment), and
 - O The number of SmartWay-designated trucks or trailers in use by the respective SmartWay partner.
- The SmartWay partner also completes and submits the Mark (i.e., logo) Signature Form. This form is found on page 33 of the SmartWay Graphic Standards & Usage Guide.) Signing and submitting this form signifies understanding of, and agreement to adhere to the SmartWay logo guidelines.

EPA estimates that it takes Partners approximately 2.75 hours to compile and submit the SmartWay Equipment Checklist and Mark Signature Form. This is a one-time submittal.

4(b)(ii)Respondent Activities

SmartWay Partnership Annual Agreement and Reporting Tool

To register with SmartWay, Respondents are asked to:

- Download the reporting tool,
- Review the embedded Partnership Annual Agreement and agree to its terms,
- Complete the reporting tool, and
- Submit the completed reporting tool to EPA electronically, by fax, or U.S. mail.

SmartWay Annual Reporting Tool

Partners are asked to annually submit an updated reporting tool to the EPA. These activities involve the following:

• Gathering information needed to provide relevant inputs for the reporting tool,

- Reviewing reporting tool reports and data outputs, and
- Submitting a new or updated reporting tool and review data outputs annually.

SmartWay Partnership Affiliate Agreement

To join the SmartWay Partnership as an Affiliate, organizations are asked to complete and submit the Affiliate Agreement. This activity includes the following:

- Download the Affiliate Agreement
- Review it and agree to its terms, and
- Submit the signed Affiliate Agreement to EPA electronically, by fax, or by U.S. mail.

Annual SmartWay Excellence Award

In addition to reporting their environmental performance data via the reporting tool, SmartWay partners have the option to submit information on their actions to reduce fuel use, save energy, and publicly promote their participation in the SmartWay program. When a partner chooses to submit this information, it will:

- Gather and compile information on its activities, including samples of promotional materials and in-house tools developed to highlight their involvement in SmartWay, and
- Send these materials to EPA, electronically, by fax, or by U.S. mail.

Program Evaluation

EPA may seek feedback on the SmartWay program on a random and voluntary basis, and Respondents may be asked to respond to a range of questions. These questions could include the usability of the reporting tool and the program's value to their organization, among others.

SmartWay Tractor & Trailer Program

A SmartWay partner's completion of the SmartWay Tractor & Trailer Program one-time application includes the following steps:

- Review the SmartWay-designated technical specifications to determine whether the tractor or trailer is eligible for the designation,
- Review the SmartWay Graphic Standards & Usage Guide that details specifics and guidelines for SmartWay logo use,
- If eligible:
 - O Complete and submit the SmartWay Equipment Checklist which can be downloaded from the SmartWay website. Information to be provided includes:
 - Name of the truck or trailer manufacturer,
 - Truck or trailer model/brand,
 - Truck or trailer model year,
 - SmartWay-verified technologies on trucks (tires, idling control devices),
 - SmartWay-verified technologies on trailers (tires, aerodynamic equipment),

Number of trucks or trailers.

5 Information Collection: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA SmartWay managers, staff, and Partner Account Managers (PAMs) will perform certain activities associated with information collections described in this ICR. These activities serve to develop, evaluate and support the SmartWay program.

SmartWay Partnership Annual Agreement

The Agency will perform the following activities related to the Partnership Annual Agreement:

- Promote company participation by posting Partner names on the SmartWay website and in related educational, promotional, and media materials,
- Provide Partners with industry-wide performance benchmark data as it becomes available to EPA,
- Assist Partners in achieving emissions and fuel usage reduction goals,
- Update and maintain SmartWay website, and
- Monitor the use of SmartWay logos.

SmartWay Annual Reporting Tool

The Agency will perform the following activities related to SmartWay partner-submitted reporting tools:

- Assign a PAM,
- Review, approve, and upload to the Partner database new and updated Partner performance data submitted in the reporting tool,
- Send a welcome letter and registration certificate to the new Partner,
- Request updates of information annually,
- Review partner activities undertaken to cooperatively promote SmartWay,
- Record partner progress in the database, and
- Update and maintain SmartWay Website Performance Carrier Ranking.

Annual SmartWay Excellence Awards

The Agency will review environmental performance data and any additional data Partners provide to highlight their progress and achievements in conserving fuel and reducing emissions:

- Review and rank environmental performance data that is submitted,
- Review and assess other Partner information submitted for award consideration, and
- Summarize and describe Partner accomplishments and achievements that warrant recognition.

Program Evaluation

The Agency will review input from its partners, and industry representatives on the program and use it to adjust and improve the program.

SmartWay Tractor & Trailer Program

SmartWay will perform the following activities in support of the SmartWay Tractor & Trailer Program:

- Review the Partner logo request application submission,
- Answer questions of Partners, as appropriate, and
- Once approved, send the digital logo files to the Partner.

5(b) Collection Methodology and Management

EPA will use a telephone system, personal computers, and applicable software to collect and analyze information gathered under this ICR. The reporting tools have embedded quality assurance controls based on EPA's statistical analyses of historical data. These controls assist the Agency in managing the data cost effectively.

Additionally, EPA will ensure the accuracy and completeness of collected information by reviewing each submittal. The Agency will upload the information obtained into the Partner database and will aggregate data obtained to monitor the progress of participants in reducing fuel consumption and air pollutant emissions. These efforts will help to ensure the proper use and processing of the information being collected to enhance the value of the information to EPA and the public.

5(c) Small Entity Flexibility

EPA expects that some independent truck owners, small fleet operators and other small businesses will participate in SmartWay. EPA has designed its information collections to minimize Respondent burden while obtaining sufficient and accurate information. EPA has tailored its reporting tools to ensure that the burden on all businesses – including small businesses – is minimal.

Small entities, along with any Respondent, can call the SmartWay Helpline, attend SmartWay webinars, or use the SmartWay email box to access help and Program information. Additionally, SmartWay works with Affiliate parters such as state trucking association to provide additional training and outreach.

5(d) Collection Schedule

The Agency collects environmental performance data from SmartWay partners annually via an Excel-based reporting tool. Additional information that is submitted for the purpose of being considered for an award is optional.

6 Estimating the Burden and Cost of the Collection

6(a) Estimating Respondent Burden

Exhibit 1 presents the annual Respondent burden hours for information collection activities associated with SmartWay. Exhibit 1 also includes the total annual hours devoted by Respondents to conduct all activities.

6(b) Estimating Respondent Costs

Exhibit 1 estimates Respondent costs associated with each information collection activity. Exhibit 1 also presents the total annual Respondent costs under all activities. Specific cost assumptions are discussed below.

6(b)(i) Estimating Labor Costs

The labor rates used to estimate costs to Respondents are consistent with hourly national wage rates published by the U.S. Bureau of Labor Statistics publications on employment and earnings. EPA estimates a median hourly Respondent labor cost. EPA also multiplied hourly wage rates by the standard government overhead factor of 1.6 to calculate overhead costs such as paid leave, health insurance, retirement savings, office space, computers, and other business expenses. This resulted in hourly Respondent labor burden of \$73.38 for legal staff, \$68.80 for managerial staff, \$57.98 for technical staff, and \$30.16 for clerical and/or administrative staff.

6(b)(ii) Estimating Capital and Operations and Maintenance (O&M) Costs

In general, EPA is not expecting that Respondents will need additional computers, software, or other capital investments to participate in the SmartWay Transport Partnership. Respondents should be able to use existing computer equipment and software to compile and submit the annual reporting tool and to submit other information as part of their SmartWay participation.

Operations and maintenance (O&M) costs are those costs associated with a paperwork requirement incurred continually over the life of the ICR. They are defined by the Paperwork Reduction Act of 1995 as the "recurring dollar amount of costs associated with O&M or purchasing service."

This ICR includes O&M costs for postage (i.e., \$0.50 for first class mail) for each submittal to EPA by postal mail. Although most submittals are electronically provided, EPA recognizes that postal mail may be used by some of our partners. Additionally, for the collection of optional items such as hard copies of materials submitted for consideration of a SmartWay Excellence Award, EPA estimates an average cost of \$15.00 per submittal.

6(c) Estimating Agency Burden and Costs.

EPA estimates that each EPA federal burden hour for the information collection

activities associated with SmartWay is conducted by an experienced technical staff person. EPA is also including overhead costs associated with employing an experienced technical staff person, such as paid leave, health insurance, retirement savings, office space, computers, and other business expenses.

EPA assumed that federal staff-level burden hours would be completed by an experienced technical staff person being paid at a GS-13, Step 3 federal government employee salary of \$76,452/year. EPA then divided the annual 2013 GS-13, Step 3 salary rate by 2080 (the number of hours in a work year) and multiplied this number by the standard government overhead factor of 1.6. This calculation resulted in a federal cost of \$58.81/burden hour.

EPA also assumed that managerial oversight would be completed by a manager being paid at the GS-14, Step 3 federal government employee salary of \$90,343/year. EPA then divided the annual 2013 GS-14, Step 3 salary rate by 2080 (the number of hours in a work year) and multiplied this number by the standard government overhead factor of 1.6. This calculation resulted in a federal cost of \$69.49/burden hour.

EPA also uses Senior Environmental Employees (SEE) to support SmartWay. For the SEE employees, EPA estimates a labor rate of \$26/burden hour. Labor rates for SEE employees are based on standard rates applied by Senior Service America, Inc., the administrator of a grant program that makes SEE employees available to the EPA.

These estimates are summarized in Exhibit 2.

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

In this section, EPA describes its estimates of the number of Respondents carrying out the information collections under SmartWay. In developing its estimates, EPA referred to its Partner database and related documentation to identify trends in the number of existing and new Respondents. Based on this understanding, EPA has estimated the average number of Respondents associated with each of the information collections under the program. These averages and an explanation of how they were derived follows for each collection activity.

Affiliate Agreement

Based on information drawn from the SmartWay Partner database, there are 3,134 Respondents participating in SmartWay. Of those 3,134 Respondents, approximately 233 (7%) of them are Affiliates.

These Affiliates do not complete or submit an annual reporting tool. Affiliates join SmartWay to help promote and support EPA's goals through marketing and communications activities. They typically do not engage in a significant amount of freight activity. Consequently it is not necessary for them to complete or submit an annual SmartWay reporting tool. However, they must complete and submit an Affiliate Agreement to participate with SmartWay as an Affiliate.

Based on historical program growth, EPA estimates that, on average, 450 Respondent organizations will join SmartWay either as Partners or Affiliates. Based on the existing

¹ January 2013 U.S. Office of Personnel Management, Salary Table 2013-GS, 2013 General Schedule,, http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2013/general-schedule/2013-gs-annual-rates-by-grade-and-step/.

percentage of Respondents that are Affiliates (i.e., 7%), EPA projects that 32 Respondents will join annually as Affiliates ($450 \times 0.07 = 32$). EPA estimates that it will take, on average. 0.82 hours for each of these Affiliates to complete and submit an Affiliate Agreement.

These assumptions are reflected in Exhibit 1.

SmartWay Partnership Annual Agreement and Reporting Tool

EPA asks all organizations that join SmartWay, with the exception of Affiliates, to download the reporting tool which is available online, and to enter their environmental data into the reporting tool before submitting it to EPA. After that, Partners are asked to provide annual updates using the reporting tool.

Approximately 93% of SmartWay's Respondents, or 2,901 Partners, submit a completed reporting tool and Annual Agreement upon joining the Program and annually thereafter. Based on historical program growth, EPA estimates that 450 organizations representing shipper, carrier (truck, rail), logistics management, and public and private affiliate groups will join SmartWay annually. Using historical trends, EPA estimates that approximately 418 of those organizations will register annually as SmartWay partners (450 x 0.93 = 418). The other 7% -32 organizations— will join as Affiliates.

EPA estimates that these 418 new partners will enter environmental performance data each year, taking 5.16 hours on average to do so. Additionally, EPA estimates that it will take another 0.66 hours on average per new SmartWay partner to review and complete the Annual Agreement that is embedded in the reporting tool. This work will entail the following:

- Reviewing the terms of the Annual Agreement, which may include legal review for some companies,
- Gathering information needed to provide relevant inputs into the reporting tool,
- Downloading the reporting tool from the SmartWay Website and entering information and relevant data into the reporting tool,
- Reviewing the reporting tool and data output for inconsistencies and errors,
- Reviewing utility options for reducing fuel use and emissions, and
- Sending the completed reporting tool to the EPA.

These assumptions are reflected in Exhibit 1.

SmartWay Annual Reporting Tool Updates

Following the initial submittal of environmental performance data using the reporting tool, EPA asks that Partners annually report their progress in meeting their environmental performance goals. In addition to the 2,901 existing partners that will provide annual reporting tool updates, new Partners also will submit an annual reporting tool. Therefore, in addition to the 2,901 existing partners that provide updated environmental data via the reporting tool, another 418 new partners will submit a reporting tool for the first time during each year of the three-year period covered by this ICR.

EPA also reviewed the SmartWay program's retention rate among its existing Partners. EPA found that about 75% of all SmartWay partners that initially submit a reporting tool maintain their status as SmartWay partners by annually submitting the reporting tool and Annual Agreement. Thus, of the 418 new SmartWay partners that submit a reporting tool for

the first time, approximately 314 of them $(418 \times .75 = 314)$ will submit a reporting tool update in proceeding years.

To develop an average complete estimate of the number of annual Respondent hours and cost burden associated with submitting the reporting tool on an annual basis, EPA factored in this retention rate. See the below Table 6.1 for an average of projected Respondents submitting reporting tools over the three-year period covered by this ICR.

Table 6.1 Average Annual Respondent SmartWay Partners

Year	Existing Respondents	New Respondents
1	2,901	418
2	3,215	418
	(2,901 + 314)	
3	3,529	418
	(3,215 + 314)	
Average Annual Respondents	3,215	418

Although the same basic actions that are involved in initially submitting the reporting tool are used in subsequent reporting years, EPA estimates that gathering, reviewing, and submitting an updated reporting tool will require an average of 2.66 hours. The reduction in this burden hour estimate (as compared to running the reporting tool for the first time) is based on the experience that SmartWay partners have acquired in managing their fleet, energy and environmental performance as well as in increased familiarity with the SmartWay reporting tool.

As a result, EPA estimates that on an average annual basis, 3,215 SmartWay partners will provide an updated reporting tool, taking 2.66 hours on average to do so.

These assumptions are reflected in Exhibit 1.

SmartWay Excellence Awards

As a part of its annual SmartWay Excellence Awards program, EPA annually reviews the environmental data Respondents submit to identify and recognize Respondents that demonstrate a high level of leadership in reducing fuel consumption and lowering greenhouse gas and other air emissions. All Respondents have the option of providing EPA with other relevant information on actions that may not be captured in their performance data.

When a Respondent voluntarily opts to submit this information, it will:

- Gather and compile information on its activities, including samples of promotional materials and in-house tools developed to highlight its involvement in SmartWay, and
- Send these materials to EPA, either electronically or by mail.

Based on EPA's experience in administering the SmartWay Excellence Awards program, it is estimated that 109 Partners (about 3.5% of all Partners) will provide this additional information for consideration on an annual basis during the three-year time period covered by this ICR. On average, these Partners will take 3.25 hours to gather and submit the award materials that they would like EPA to evaluate.

These assumptions are reflected in Exhibit 1.

Program Evaluation

Over the three year period covered by this ICR, EPA expects that it will ask Respondents for advice and suggestions on the effectiveness of SmartWay and how to improve the tools and incentives it provides the transportation sector. EPA will request this information no more than once a year from no more than 150 Respondents and expects that it will require no more than 15 minutes of time from a Respondent.

These assumptions are reflected in Exhibit 1.

SmartWay Tractor & Trailer Program

Approximately 170 SmartWay partners reported owning or operating trucks that meet the SmartWay designated specifications. This is an annual average of 28 SmartWay partners applying to participate since the SmartWay Tractor Program began in 2008.

Approximately 54 SmartWay partners reported owning or operating dry van trailers that meet the SmartWay designated specifications. This is an annual average of nine (9) Partners applying to participate since trailers were included in the Program in 2009.

Based on historical data, EPA estimates that, on average, 37 interested Partners will apply to participate in the SmartWay Tractor & Trailer Program annually over the three-year period covered by this ICR. EPA estimates that it will take these Partners approximately 2.75 hours each to gather the required data and to complete and submit the one-time SmartWay Equipment Checklist and the Mark Signature form needed to participate in the SmartWay Tractor & Trailer program.

These assumptions are reflected in Exhibit 1.

6(e) Bottom Line Burden Hours and Cost Tables

6(e)(i) Respondent Tally

As shown in Table 6.2, EPA estimates the total annual hour and cost burden to Respondents to be 11,504 hours and \$628,477.

Table 6.2
Total Estimated Annual Respondent Burden and Cost Summary

Information Collections			Total Annual Burden Hours	Total Annual Labor	Total Annual Capital Cost	Total Annual O&M Cost	Total Annual Cost	
Affiliate Agreement	32	.82	26	\$1,588	\$0	\$16	\$1,605	
Initial Reporting Tool and Annual Agreement Submission	418	5.82	2,433	\$142,500	\$142,500 \$0		\$142,500	
Annual Reporting Tool Updates	3,215	2.66	8,552	\$454,201	\$0	\$0	\$454,201	
Excellence Awards & Recognition	109	3.25	354	\$20,371	\$0	\$1,635	\$22,006	
Evaluation	150	.25	38	\$2,580	\$0	\$0	\$2,580	
Tractor & Trailer Program	37	2.75	102	\$5,585	\$0	\$0	\$5,585	
TOTAL	3,961		11,504	\$626,825	\$0	\$1,651	\$628,477	

6(e)(i)(i) Agency Tally

In Table 6.3, EPA presents a summary of the total estimated annual Agency burden for the SmartWay program.

Table 6.3
Total Estimated Annual Agency Burden and Cost

Respondent Type Annual Burden Hours		Total Annual Labor Costs	Total Annual Capital Cost	Total Annual O&M Cost	Total Annual Cost	
Agency 4,332		\$159,971	\$0	\$321	\$160,292	

6(f) Reasons for Change in Burden

Increase in Respondent burden since the previous ICR was approved is approximately **3,203** hours:

• Adjustment due to increased interest in SmartWay and thus, an increase in new annual Respondents.

The average annual number of burden hours for new reporting tools, not including the burden associated with completing the Annual Agreement has <u>increased</u> by 331 hours (i.e., from 1,826 to 2,157 average annual burden hours.) This increase is due to the growth in the number of new Respondents since the last ICR.

The number of new Respondents submitting a reporting tool for the first time is estimated to have <u>increased</u> from 260 to 418 Respondents. This is based on historical trends and a programmatic change that now requires any new Respondent to submit a reporting tool in addition to the Partnership Annual Agreement when it initially registers with SmartWay.

Burden hour increase attributable to this change: Approximately 331 hours

• Adjustment due to robust retention, and as a result, an increased number of existing Respondent Partners.

The average number of burden hours for updated reporting tools has increased by 2,727 annual burden hours due to Program growth (i.e., from 5,825 annual average burden hours to 8,552 annual average burden hours.) This is due to Program growth.

The average annual number of Respondents submitting an updated reporting tool and Annual Agreement has <u>increased</u> from an annual average of 2,190 respondents to an annual

average of 3,215 Respondents, since the last ICR.

Burden hour <u>increase</u> attributable to this change: Approximately 2,727 hours

• Adjustment due to a projected increase in Respondent interest in the SmartWay Excellence Award.

The number of projected annual SmartWay Excellence Awards applicants has increased based on the increased number of SmartWay partners.

Burden hour increase attributable to this change: Approximately 110 hours

• Program Change associated with the SmartWay Tractor & Trailor Program.

EPA has added information collection requirements with the SmartWay Tractor & Trailer Program, to increase the Program's effectiveness and reflect changes in fleet mix.

Burden hour increase attributable to this change: Approximately 102 hours

• Program Change associated with SmartWay's streamlined Partnership Annual Application.

The reason for this change is that EPA streamlined its process so new Partners submit their Partnership Annual Agreement as part of the reporting tool. Thus, the 0.16 hours needed to submit the Agreement is now merged in with the reporting tool submission. There is an annual reduction in 0.16 hours per Respondent needed to submit the Partnership Annual Agreement - from 0.82 hours to 0.66 hours. The annual Respondent burden associated with submitting the Affiliate Agreement has not changed.

Burden hour decrease attributable to this change: Approximately 67 hours

EPA believes the burden in this ICR renewal is justified in light of the many benefits to participants, the public, and the environment.

6(g) Burden Statement

EPA estimates that the reporting burden per SmartWay Respondent will be approximately 2.90 hours per year. EPA notes that this is an average across all SmartWay partners, regardless of whether they are SmartWay Affiliates or SmartWay Partners. It is also an average for all Respondents, regardless of how they have participated with SmartWay (i.e., whether they have previously completed Partner agreements, submitted additional information for Program evaluation, or submitted an application for Excellence award consideration.).

Burden means the total time, effort, or financial resources expended by a person to generate, maintain, retain, 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;

adjust the existing ways to comply with previously applicable instructions; search data sources; complete and review the collection of information; 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.

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-2007-0482, which is available for online viewing at www.regulations.gov, or in person viewing at the Air Docket in the EPA Docket Center (EPA/DC), WJC 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 Docket is (202) 566-1742. An electronic version of the public docket is available at 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-2007-0482 and OMB Control Number 2060-0663 in any correspondence.

Exhibit 1
Estimated Annual Respondent Burden and Cost

	Hours and Costs per Respondent						Total Hours and Cost				
Information Collection Activity Affiliate Agreement	Legal \$73.38/hr	Manager \$68.80/h r	Technica I \$57.98/hr	Clerical \$30.16/h r	Response Hours/Yea r	Labor Cost/ Year	Capitol Startu p Costs	O&M Costs	Number of Respond- ents	Total Hours/ Year	Total Cost/ Year
Review Affiliate Agreement	0.25	0.25	0.16	0	0.66	\$44.82	0	\$0.00	32	21.12	\$1,434
Return Affiliate Agreement to EPA	0.23	0.23	0.10	0.16	0.16	\$4.83	0	\$0.50	32	5.12	\$1,454
Subtotal	0.25	0.25	0.16	0.16	0.10	\$49.65	\$0.00	\$16.00	32	26.24	\$1,605
New SmartWay Reporting Tool	0.23	0.23	0.10	0.10	0.02	ψ+3.03	Ψ0.00	Ψ10.00	52	20.24	Ψ1,005
Review Partnership Annual Agreement	0.25	0.25	0.16	0	0.66	\$44.82	0	\$0.00	418	275.88	\$18,736
Tronow Farmoromp / mindar / igroomone	0.20	0.20	0.10		0.00	411.02	Ū	40.00	120	1,045.0	\$10,100
Gather data & info for reporting tool	0	0.5	2	0	2.5	\$150.36	0	\$0.00	418	0	\$62,850
Input data into reporting tool	0	0	1	0.5	1.5	\$73.06	0	\$0.00	418	627.00	\$30,539
Review reporting tool	0	0.5	0.5	0	1	\$63.39	0	\$0.00	418	418.00	\$26,497
Send completed reporting tool to EPA	0	0	0.16	0	0.16	\$9.28	0	\$0.00	418	66.88	\$3,878
Subtotal	0.25	1.25	3.82	0.5	5.82	\$340.91	\$0.00	\$0.00	418	2,432.7 6	\$142,500
Update SmartWay Reporting Tool											
Gather Data & Info to Update reporting tool	0	0	1	0	1	\$57.98	0	\$0.00	3215	3215.00	\$186,406
Input data into reporting tool	0	0	0	0.5	0.5	\$15.08	0	\$0.00	3215	1607.50	\$48,482
Review reporting tool	0	0.5	0.5	0	1	\$63.39	0	\$0.00	3215	3215	\$203,799
Send reporting tool to EPA	0	0	0	0.16	0.16	\$4.83	0	\$0.00	3215	514.40	\$15,514
Subtotal	0	0.5	1.5	0.66	2.66	\$141.28	\$0.00	\$0.00	3215	8551.90	\$454,201
SmartWay Excellence Awards						ı				I	
Gather information for EPA consideration	0	0	2	0	2	\$115.96	0	\$0.00	109	218.00	\$12,640
Review and Send Information to EPA	0	0.5	0.5	0.25	1.25	\$70.93	0	\$15.00	109	136.25	\$7,731
Subtotal	0	0.5	2.5	0.25	3.25	\$186.89	\$0.00	\$1,635.0 0	109	354.25	\$22,006
Awareness Assessment											
Complete and submit online assessment	0	0.25	0	0	0.25	\$17.20	0	\$0.00	150	37.50	\$2,580
Subtotal	0	0.25	0	0	0.25	\$17.20	\$0.00	\$0.00	150	37.50	\$2,580
SmartWay Tractor &Trailer Program											
Gather data & complete Equipment Checklist	0	0.5	1.75	0.5	2.75	\$150.95	0	\$0.00	37	101.75	\$5,585
Total	0.5	3	10	2	16	\$887	\$0	\$1,651	3961	11504	\$628,477

Exhibit 2 **Estimated Annual Agency Burden and Cost**

Hours and Costs per Respondent Total Annual Number Agency Agency Labor Capitol Annual of Total Cost/ O&M Hours/ Manager Technical SEE Hours/ Costs/ Startup Respond. \$69.49/hr \$58.81/hr \$26.00/hr Activities Year Year Year Costs Costs Year **Partnership and Affiliate Agreements** Review & Process submitted SmartWay Partnership and Affiliate Agreements 0.03 0 0.08 0.11 0 \$0.00 49.5 \$4.16 450 \$1.874 Send a Letter Welcoming Partner to SmartWay 0 0 0 0.08 0.08 \$2.08 \$0.50 450 36 \$1,161 Program 0 Update EPA/SmartWay Website 0 0 0.08 0.08 \$2.08 \$0.00 450 36 \$936 Subtotal 0.03 0 0.24 0.27 \$8.32 0 \$225.00 450 121.5 \$3,971 **New SmartWay Reporting Tools** Review and Evaluate Reporting Tools 0.08 0.25 1.5 1.83 \$59.26 0 \$0.00 418 764.94 \$24,771 Update SmartWay partner database with Reporting Tool Data 0 0 0.5 0.5 \$13.00 0 \$0.00 418 209 \$5,434 0 0 0 Update EPA/SmartWay Website 0 0 \$0.00 \$0.00 418 0 \$0 2 0 \$30,205 Subtotal 0.08 0.25 2.33 \$72.26 \$0.00 418 973.94 **Update SmartWay Carbon Tracking System** Review and Evaluate Updated Reporting Tools 0.08 0.08 0.5 0.66 \$23.26 0 \$0.00 3215 2121.9 \$74,794 Update SmartWay Partner Acct Mgmt D-base with **Updated Reporting Tools** 0 0.08 0.08 0.16 \$6.78 0 \$0.00 3215 514.4 \$21,813 0 Subtotal 0.08 0.16 0.58 0.82 \$30.05 \$0.00 3215 2636.3 \$96,607 **SmartWay Excellence Awards** Develop Awards Criteria 0.08 0.5 0 0.58 \$34.96 0 \$0.00 109 63.22 \$3,811 Review Database for Environmental Data 0 0.5 1 1.5 \$55.41 0 \$0.00 109 163.5 \$6,039 Receive and review other information submitted 0 1 0.5 1.5 \$71.81 0 \$0.00 109 163.5 \$7,827 0 Notify partners that will receive award 0 0.08 0.16 0.24 \$8.86 \$0.50 109 26.16 \$1,021 0 \$54.50 Subtotal 0.08 2.08 1.66 3.82 \$171.04 109 416.38 \$18,698 **Awareness Assessment** Review assessment, research focus and questions 0.08 0.5 0 0.58 \$34.96 0 \$0.00 150 87 \$5,245 Process assessment and present results to internal audiences 0.25 0 0.25 \$14.70 0 \$0.00 150 37.5 \$2,205 0 0 Subtotal 0.08 0.75 0.83 \$49.67 \$0.00 150 124.5 \$7,450 **SmartWay Tractor-Trailer** Review Partner application submission 0 0.1 1.1 \$61.41 0 \$0.00 37 40.7 \$2,272 Send logo graphic files to Partner 0 0.5 0 0.5 \$29.41 0 \$0.00 37 18.5 \$1,088 Subtotal 0 1.5 0.1 1.6 \$90.82 0 \$0.00 37 59.2 \$3,360 **Total** 0.35 4.74 4.58 9.67 \$422.16 0 \$279.50 4379 4331.82 \$160.292

Total Hours and Cost