

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information

NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P), (Renewal), EPA ICR Number 2066.06, OMB Control Number 2060-0483.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) was proposed on May 14, 2002, and promulgated on May 27, 2003. These regulations apply to any new or reconstructed engine test cells/stands located at major source facilities that are being used for testing internal combustion engines. An engine test cell/stand is any apparatus used for testing uninstalled stationary or uninstalled mobile (motive) engines. A plant site that is a major source of hazardous air pollutant (HAP) emissions emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAPs at a rate of 25 tons (22.68 megagrams) or more per year. New or reconstructed sources must be in compliance with the requirements of the engine test cells/stands NESHAP upon startup. New facilities include those that commenced construction, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart P.

In general, all NESHAP standards require initial notification reports, 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 NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five 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 U.S. Environmental Protection Agency (EPA) regional office.

Approximately 18 respondents are currently subject to the regulation, and it is estimated that no additional respondents per year will become subject to the regulation in the next three years.

The Office of Management and Budget (OMB) approved the currently active ICR without any Terms of Clearance.

There are approximately 18 engine test cells/stands facilities in the United States, which are owned and operated by the engine test cells industry. None of the 18 facilities in the United States are owned by either state, local, tribal or the Federal government. They are owned and operated by privately-owned, for-profit businesses. The “burden” to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P P P P P) (Renewal). The “burden” to the “Federal Government” burden is attributed entirely to work performed by federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P P P P P) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from engine test cells/stands cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR Part 63, Subpart P P P P P.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which were 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 standards 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, that leaks are being detected and repaired, and that the standard is being met. The performance test may also be observed.

The required semiannual 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 63, Subpart PPPPP.

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, no duplication 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 Federal Register (79 FR 30117) on May 27, 2014. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency's industry experts have been consulted, and the Agency's internal data sources and projections of industry growth over the next three years have been considered. 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.

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. In developing this ICR, we contacted: 1) the National Marine Manufacturers Association, at (202) 737-9757; and 2) the Truck & Engine Manufacturers Association, at (312) 929-1970.

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 Federal Register notice. In this case, no comments were received.

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.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA could be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 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 engine test cells/stands. The United States Standard Industrial Classification (SIC) codes and their corresponding North American Industry Classification System (NAICS) codes are listed below for each source category description:

Standard (40 CFR Part 63, Subpart PPPPP)	SIC Codes	NAICS Codes
Turbine and Turbine Generator Set Units Manufacturing	3511	333611
Other Engine Equipment Manufacturing	3519	333618
All Other Motor Vehicle Parts Manufacturing	3519	336399
Hand and Edge Tool Manufacturing	3523	332212
Lawn and Garden Tractors and Home Lawn and Garden Equipment Manufacturing	3524	333112
Hand and Edge Tool Manufacturing	3524	332212
Construction Machinery Manufacturing	3531	333120
Farm Machinery and Equipment Manufacturing	3559	333111
Other Commercial and Service Industry Machinery Manufacturing	3559	333319
Speed Changers, Industrial High-Speed Drives, and Gears Manufacturing	3566	333612
Motors and Generator Manufacturing	3621	335312
Automobile Manufacturing	3711	336111
Heavy Duty Truck Manufacturing	3711	336120
Light Truck and Utility Vehicle Manufacturing	3711	336112
Military Armored Vehicle, Tank, and Tank Component Manufacturing	3711	336992
Gasoline Engine and Engine Parts Manufacturing	3714	336312
Motor Vehicle Transmission and Power	3714	336350

Standard (40 CFR Part 63, Subpart P P P P P)	SIC Codes	NAICS Codes
Parts Manufacturing		
Aircraft Manufacturing	3721	336411
Research and Development in the Physical, Engineering, and Life Sciences	3721	541710
Aircraft Engine and Engine Parts Manufacturing	3724	336412
Research and Development in the Physical, Engineering, and Life Sciences	3724	541710
Guided Missile and Space Vehicle Manufacturing	3761	336414
Research and Development in the Physical, Engineering, and Life Sciences	3761	541710
Guided Missile and Space Vehicle Propulsion Unit and Propulsion Unit Parts Manufacturing	3764	336415
Research and Development in the Physical, Engineering, and Life Sciences	3764	541710
Scheduled Passenger Air Transportation	4512	481111
Other Support Activities for Air Transportation	4581	488190
Research and Development in the Physical, Engineering, and Life Sciences	8731	541710
Testing Laboratories	8734	541380
Automobile Driving Schools	8299	611692
General Automotive Repair	7538	811111
Other Automotive Mechanical and Electrical Repair and Maintenance	7539	811118
Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance	7699	811310
Home and Garden Equipment Repair and Maintenance	7699	811411
Space Research and Technology	9661	927110
National Security	9711	928110

4(b) Information Requested**(i) Data Items**

In this ICR, all the data that is recorded or reported is required by the NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P).

A source must make the following reports:

Notifications	
Initial notification	63.9345(b), 63.5(d), 63.9(b)
Notification of compliance status	63.9345(c), 63.9(h)
Notification of intent to conduct CEMS performance evaluation	63.9345(d), 63.8(e)(2)
Initial performance evaluation	63.9320(b), 63.9345(d), 63.8(e)(2)
Notification of alternative monitoring method	63.8(f)(4)
Waiver of recordkeeping or reporting requirements	63.10(f)
Additional notification	63.8(e), 63.8(f)(4 and 6), 63.9(b), 63.9(g)(1 and 3), 63.9(h), 63.9(j)

Reports	
Semiannual compliance report	63.9340(b), 63.9350(a-d), 63.10(a), 63.10(e)
Startup, shutdown, or malfunction (SSM) report (required only if control device/monitoring equipment SSM deviates from SSM plan)	63.9350(e), 63.10(d)(5)

A source must keep the following records:

Recordkeeping	
Maintain records of emission test results and other data needed to determine compliance with emission limitation	63.9355(a)(4 and 5)
Maintain records of all reports and notifications	63.9355(a), 63.10(b)
Maintain records of applicability	63.10(b)(3)

Recordkeeping	
Maintain records for sources with continuous monitoring systems	63.9355(a)(2), 63.9355(b), 63.9355(c), 63.10(b), 63.10(c)
Maintain records for initial notification and notification of compliance status	63.9355(a)(1), 63.10(b)(2)(xiv)

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.
Install, calibrate, maintain, and operate CEMS for opacity.
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 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
Observe initial performance tests and repeat performance tests if necessary.
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. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual 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 five years.

5(c) Small Entity Flexibility

All of the current 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 – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal).

6. Estimating the Burden and Cost of the Collection

Table 1 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. Where 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 recordkeeping and reporting requirements is estimated to be 1,719 hours (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 NESHAP 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	\$128.02 (\$60.98 + 110%)
Technical	\$101.05 (\$48.12 + 110%)
Clerical	\$51.37 (\$24.46 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, “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 onetime costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) 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) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
CPMS	\$500	0	\$0	\$300	18	\$5,400

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$5,400. 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 \$5,400.

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 \$7,118.

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

Managerial	\$62.90 (GS-13, Step 5, \$39.31 + 60%)
Technical	\$46.67 (GS-12, Step 1, \$29.17 + 60%)
Clerical	\$25.25 (GS-6, Step 3, \$15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2014 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 – NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) (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 18 existing respondents will be subject to the standard. It is estimated that no new respondents per year will become subject to the standard. The overall average number of respondents, as shown in the table below, is 18 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	18	N/A	0	18
2	0	18	N/A	0	18

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
3	0	18	N/A	0	18
Average	0	18	N/A	0	18

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 18.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Compliance status report	18	2	0	36
			Total	36

The number of Total Annual Responses is 36.

The total annual labor costs are \$168,207. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart P) (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 below, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 1,719 hours, at a cost of \$168,207. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 48 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$5,400. 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 156 labor hours at a cost of \$7,118. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal).

6(f) Reasons for Change in Burden

There is a decrease of 1,324 hours in the total estimated respondent burden compared with the ICR currently approved by OMB. This decrease is due to the correction of two errors. First, in the previous ICR, it was assumed that performance evaluation reports would be submitted every five years. However, performance evaluations are only conducted initially, when new facilities first needed to demonstrate compliance with the standard. Since there will be no new or reconstructed sources over the next three years, performance evaluations are not required. Second, in the previous ICR, it was assumed that one out of the eighteen sources would write an annual deviation report. However, deviations are reported as part of the semiannual compliance status report; separate reports are not required. As a result of these two corrections, there is an overall decrease in the estimated burden cost as currently identified in the OMB Inventory of Approved Burdens.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 48 hours 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-2014-0091. 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-2014-0091 and OMB Control Number 2060-0483 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 – NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart P) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents 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) Total Cost per year ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions ^c	4	1	4	0	0	0	0	\$0
B. Notifications ^c								
Initial notifications	2	1	2	0	0	0	0	\$0
Notification of construction/ reconstruction	2	1	2	0	0	0	0	\$0
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
Compliance status report ^d	4	2	8	18	144	7.2	14.4	\$16,212.67
Performance evaluation report ^e	16	1	16	0	0	0	0	\$0
Subtotal for Reporting Requirements					166			\$16,213
4. Recordkeeping requirements								
A. Initial performance evaluation ^{f, g}	330	1	330	0	0	0	0	\$0
B. Monitoring demonstration ^{f, g}	148	1	148	0	0	0	0	\$0
C. Repeat performance evaluation ^{f, g, h}	330	1	330	0	0	0	0	\$0

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents 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) Total Cost per year^b
D. Maintain records of CEMS performance ⁱ	1.5	50	75	18	1,350	67.5	135	\$151,993.80
Subtotal for Recordkeeping Requirements					1,553			\$151,994
TOTAL LABOR BURDEN AND COST (Rounded)					1,719			\$168,207

Assumptions:

- ^a We have assumed that the average number of existing sources subject to the rule will be 18. There will be no additional new sources per year that will become subject to the rule over the three-year period of this ICR.
- ^b This ICR uses the following labor rates: \$128.02 per hour for Executive, Administrative, and Managerial labor; \$101.05 per hour for Technical labor, and \$51.37 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March, 2014, 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 there will be no new or reconstructed sources over the next three years.
- ^d We have assumed that compliance status reports are required semiannually, and that deviations get reported as part of the semiannual compliance status reports.
- ^e We have assumed that no respondents need to submit an initial performance evaluation report, since there are no new or reconstructed sources over the next three years.
- ^f We have assumed that no respondents need to keep records related to the initial performance evaluation since there are no new or reconstructed sources over the next three years.
- ^g The technical persons-hours per occurrence were taken from the ESD manual Table 4 “Burden of Performance Tests and Continuous Monitoring System (CMS) Demonstrations” (Volume X, Section 2.2).
- ^h We have assumed that 20 percent of respondents will have to repeat the performance evaluations due to failure.
- ⁱ We have assumed that owners and operators will have to maintain monitoring records on a weekly basis.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (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
1. Attend CEMS performance evaluation	32	1	32	0	0	0	0	\$0
2. Repeat performance evaluation								
a. Retesting preparation	12	1	12	0	0	0	0	\$0
b. Attend retesting	32	1	32	0	0	0	0	\$0
3. Deviation – enforcement activities ^c	16	1	16	4	64	3.2	6.4	\$3,349.76
4. Reporting requirements								
a. Review regulation	2	2	4	0	0	0	0	\$0
b. Review waivers	2	2	4	0	0	0	0	\$0
c. Review reports								
Review initial notification	2	1	2	0	0	0	0	\$0
Compliance status report ^d	2	2	4	18	72	3.6	7.2	\$3,768.48
Performance evaluation report ^e	2	1	2	0	0	0	0	\$0
TOTAL ANNUAL BURDEN AND COST (Rounded)						156		\$7,118

Assumptions:

^a We have assumed that the average number of existing sources subject to the rule will be 18 and that no additional new sources will become subject to the rule over the three-year period of this ICR.

^b This cost is based on the following labor rates which have been increased by 60 percent to account for the benefit package available to government employees: \$62.90 Managerial rate (GS-13, Step 5, \$39.31 + 60%), \$46.67 Technical rate (GS-12, Step 1, \$29.17 + 60%), and \$25.01 Clerical rate (GS-6, Step 3, \$15.78 + 60%). These rates are from the Office of Personnel Management (OPM) 2014 General Schedule which excludes locality rates of pay.

^c We have assumed that 20 percent of respondents will be out of compliance.

^d We have assumed that compliance status reports are required semiannually, and that deviations get reported as part of the semiannual compliance status reports.

^e We have assumed that no performance evaluation reports will be submitted, since there are no new or reconstructed sources over the next three years.