

1 Supporting Statement

For

Information Collection Request

Engine Emission Defect Information Reports and
Voluntary Emission Recall Reports (Revision)

ICR Number 0282.17
OMB Number 2060-0048

August 2017

42 USC 7521 § 206, § 207 & § 213

40 CFR Part 85, Subparts S and T
40 CFR Part 85; 40 CFR Part 89
40 CFR Part 90; 40 CFR Part 91
40 CFR Part 92; 40 CFR Part 94
40 CFR Part 1033; 40 CFR Part 1039
40 CFR Part 1042; 40 CFR Part 1045
40 CFR Part 1048; 40 CFR Part 1051
40 CFR Part 1054; 40 CFR Part 1068

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

1. **Identification of the Information Collection**

1(a) **Title and Number of The Information Collection**

Engine Emission Defect Information Reports and Voluntary Emission Recall Reports (Revision; EPA Number 0282.17, OMB Control Number 2060-0048).

1(b) **Short Characterization/Abstract**

Under Section 206(a) of the CAA (42 USC 7521), engine manufacturers may not legally introduce their products into US commerce unless EPA has certified that they comply with applicable emission standards. Section 213(d) extends all emission certification and compliance provisions to non-road engines and vehicles. During the certification process, manufacturers must demonstrate that their products comply with applicable emissions standards throughout their useful lives.

Per sections 207(c)(1) and 213 of the Clean Air Act (CAA), when emission testing shows that a substantial number of properly maintained and used engines produced by a manufacturer do not conform to emission standards, the manufacturer is required to recall the engines. When manufacturers learn of the existence of emission-related defects in specified number of engines of the same class and model year, they are required to submit a Defect Information Report (DIR). DIRs contain information about the engines on which a defect has been found and a description of the defect and its effects on engine performance and emissions. For some types of engines, manufacturers must also submit bi-annual reports as they conduct their defect-related investigations. EPA uses these reports to target potentially nonconforming classes of engines for future testing, to monitor compliance with applicable regulations and to order a recall, if necessary.

If warranted, manufacturers can also initiate a recall voluntarily by submitting a Voluntary Emission Recall Report (VERR). EPA may also order a recall. VERRs contain information such as the procedures used by manufacturers to notify engine owners, the identification of engines affected, and repairs to be completed on recalled engines. Manufacturers also submit progress reports that track the number of engines repaired (VERR updates). VERRs and VERR updates allow EPA to determine whether the manufacturer conducting the recall is acting in accordance with the CAA and to examine and monitor the effectiveness of the recall campaign.

This information collection request covers on-road heavy-duty (HD) engines (i.e., truck engines), highway motorcycles and nonroad (NR) engines. NR is a broad category that refers to a group of engines used in off-road applications, ranging from lawn movers to ocean-going vessels and locomotives¹. For the purpose of this ICR, the term 'NR' refers to:

1. NR compression-ignition (CI) engines,

¹ For additional information on NR industries, visit <https://www.epa.gov/air-pollution-transportation>.

2. NR small spark-ignition (SI) engines,
3. NR large spark-ignition (LSI) engines,
4. Marine spark-ignition (MSI) engines,
5. Marine compression-ignition (MCI) engines,
6. Locomotives and locomotive engines, and
7. Recreational vehicles (snowmobiles, all-terrain vehicles & dirt bikes).

This information is collected by the Diesel Engine Compliance Center (DECC), Compliance Division (CD), Office of Transportation and Air Quality, Office of Air and Radiation, U.S. Environmental Protection Agency (EPA). Besides DECC, this information could be used by the Office of Enforcement and Compliance Assurance and the Department of Justice for enforcement purposes. Non-confidential portions may be disclosed to the public. Trade associations, environmental groups and the public may use this information, which is usually electronically and stored in CD's databases.

EPA estimates that approximately 29 engine manufacturers will respond to this collection with an approximate cost of \$936,157.

2. Need For and Use of the Collection

2(a) Need/Authority for The Collection

1EPA's emission compliance programs, including-emissions related recalls, are statutorily mandated; the agency does not have discretion to cease these functions. Sections 207(c)(1) and 213 of the Clean Air Act (CAA) mandate engine manufacturers to conduct recalls when in-use emission testing shows that a substantial number of properly maintained and used engines of the same class or engine family do not conform to emission standards.

Section 208(a) of the Clean Air Act provides EPA with the authority to require a manufacturer to "make reports and provide information the Administrator may reasonably require to determine whether the manufacturer or other person has acted or is acting in compliance" with Title II of the Clean Air Act and applicable regulations. Regulations implementing such reporting requirements are codified at:

- 40 CFR part 85, Subpart T - On-highway, Heavy-duty Truck Engines and Highway Motorcycle Engines
- 40 CFR Part 89, Subpart I - Non-road Compression-ignition Engines
- 40 CFR Part 90, Subpart I - Non-road Spark-ignition Engines
- 40 CFR Part 91, Subpart J - Marine Spark-ignition Engines
- 40 CFR Part 92, Subpart E - Locomotives and Locomotive Engines
- 40 CFR Part 94, Subpart E - Marine Compression-ignition Engines
- 40 CFR Part 1068, Subpart F - General provisions for engines certified under:
 - 40 CFR Part 1033 – Locomotives
 - 40 CFR Part 1039 - Non-road Compression-ignition Engines
 - 40 CFR Part 1042 - Marine Compression-ignition Engines

- 40 CFR Part 1045 - Marine Spark-ignition Engines
- 40 CFR Part 1048 – Large Spark-ignition Engines
- 40 CFR Part 1051 – Recreational Vehicles (Snowmobiles and All Terrain Vehicles only)
- 40 CFR Part 1054 - Non-road Spark-ignition Engines

The information collected under this information collection request is needed to identify potentially noncomplying engines. Those engines are then targeted for future testing to ensure that they comply with emission standards throughout their useful lives.

2(b) Practical Utility/Users of The Data

1EPA uses the information requested to ensure compliance with the Clean Air Act's in-use emission requirements. This information collection enables EPA to ensure that engine manufacturers are complying with applicable in-use emission regulations, measure the impact of non-road engines' emissions on air quality, and take corrective actions as needed.

Defect-related reports notify EPA of the existence of defects in a significant number of engines that may cause engine emissions to exceed applicable standards. These reports enable the Agency to take action, as needed. If a family of engines is found not to comply with in-use standards, manufacturers are required to recall the family. Recall-related reports are used to determine if a manufacturer is acting in accordance with the Clean Air Act and to examine and monitor the effectiveness of a recall campaign. Measures of effectiveness include the procedures the manufacturer is following to notify vehicle owners and provide timely repairs, the percentage of vehicle owners that are responding to recall notification and the number of engines that are being repaired.

The information will be received and used by DECC. In instances of noncompliance, the information may be used by EPA's enforcement office and the Department of Justice. Non-confidential portions of the information submitted to DECC are available to and used by importers, environmental groups, members of the public and state and local government organizations.

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

3(a) Non-duplication

1The information requested under this ICR is required by statute. Because of its specialized and sometimes confidential nature, the information collected is not available from any other source.

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

1An announcement of the public comment period for this ICR renewal was published in the Federal Register on June 29, 2017 (82 FR 29544). No comments were received.

3(c) Consultations

In updating this information collection request, EPA contacted fewer than 10 past respondents regarding this information collection burden.

3(d) Effects of Less Frequent Collection

Defect-related and VERRs are only collected as needed. That is, when a certain number of properly maintained engines register defects that may cause engine emissions to exceed applicable standards. For NR engines, defect-related investigation reports are submitted bi-annually, but only once the manufacturer determines that an issue may exist. Thus, manufacturers are required to provide this information only when potential violations exist. Less frequent collection of these data would allow potential violations to go undetected.

Follow-up progress reports on voluntary recalls (VERRs) are collected quarterly for up to six quarters. These progress reports or updates are used to monitor the progress of a recall campaign, observing the promptness with which engines subject to the recall receive the remedial repair. Experience has shown that the quarterly reporting interval, which corresponds to most manufacturers' internal cycles, is generally the minimum interval for effective oversight of a recall campaign.

3(e) General Guidelines

According to Part 1068.501(c)(1), manufacturers must submit DIRs within 21 days after the date the threshold specified in 1068.501(f) is met. When a recall becomes necessary under Part 1068.505(c), manufacturers have 60 days to submit a remedial plan (same as a VERR). Manufacturers must then update EPA on the progress of the recall for six consecutive quarters or until all engines are inspected, whichever comes first (1068.525(b)). VERR updates are due 25 days after the end of each quarter.

For industries regulated under other Parts (see section 2(a) for details), DIRs are due within 15 days from the time a manufacturer determines that a reportable defect exists. If information necessary to complete the written report is not available to the respondent within 15 days, the respondent may submit the missing information when it becomes available. VERRs are required within 15 days after vehicle owner notification.

This collection also requires manufacturers to retain records for periods longer than one year. For industries regulated under Part 1068, records must be kept for three years (1068.530). For other industries, records are kept for five years. These recordkeeping requirements stem

mainly from the statutory requirement to warrant some items for long periods and because some of the types of engines covered by this collection have extremely long useful lives (e.g., locomotives).

Manufacturers may need to submit certain sensitive technical descriptions when describing the nature of a defect. That information is kept confidential in accordance with the Freedom of Information Act, EPA regulations at 40 CFR Part 2, and class determinations issued by EPA's Office of General Counsel.

3(f) Confidentiality

Manufacturers are allowed to assert a claim of confidentiality over information provided to EPA. Confidentiality is provided in accordance with the Freedom of Information Act and EPA regulations at 40 CFR Part 2.

3(g) Sensitive Questions

No questions of a sensitive nature are asked.

4. The Respondents and the Information Requested

4(a) Respondents/NAICS Codes

1 Respondents are manufacturers of non-road engines within the following North American Industry Classification System (NAICS) codes:

- 333618 Other Engine Equipment Manufacturing
- 336312 Gasoline Engine and Engine Parts Manufacturing

4(b) Information Requested

EPA has developed electronic tools that respondents use to submit the information requested. Section 4(b)(i) below summarizes the data requested under each program and the tools used to collect it.

1(i) Data Items

Subsections A through E below list most of the data items requested under this information collection. Some of these data items are required to be kept in records and submitted only upon request. The lists in these sections are meant to give an idea of what is

usually requested. For a complete list of all data items applicable for each type of engine, please refer to the regulations listed in Section 2(a).

A. Defect Information Reports (DIRs)

Manufacturers are required to submit defect information reports only when their data indicates that an emission-related defect may exist in a substantial number of properly maintain engines. The term “substantial number” has different definitions in some of the regulations covered by this collection. Part 1068 establish thresholds based on projected sales (40 CFR 1068.501(e)). Section 2(a) lists the industries regulated under Part 1068. ; For other industries, the regulations generally define this term as 25 engines or more (10 for locomotives).

Manufacturers must report within 15 working days (21 days for engines subject to Part 1068) after a defect is found in a substantial number of engines. These requirements apply only to engines that have already been sold to the public and remain in effect for five years after the model year in which the engine was certified. For engines subject to Part 1068, the requirements apply for the entire useful life of the engine or five years after the end of the model year, whichever is longer [40 CFR 1068.501(b)(4)].

Manufacturers of HD engines use a form to submit their DIRs. NR manufacturers may choose the format in which they submit their reports. EPA may develop forms for NR manufacturers in the future. Data items requested in Defect Information Reports include:

- The manufacturer's corporate name
- A description of the defect
- A description of the class or category of engines
- Number of vehicle or engines estimated or known to have the defect and explanation of derivation.
- The address of the plant(s) where they were produced
- Evaluation of the emissions impact and any driveability problems it might cause
- Available emissions data related to the defect
- Indication of any anticipated manufacturer follow-up

Under Part 1068, manufacturers must update EPA as they investigate a defect to determine whether the applicable threshold has been reached. These reports must be submitted bi-annual, no later than June 30 and December 31 of each year until the manufacturer makes a determination.

B. 1Voluntary Emission Recall Reports (VERRs)

After a manufacturer determines that the applicable threshold was met, the manufacturer may choose to recall the engines or EPA may order a recall. (For simplicity, we are referring to all recall reports as VERRs, a widely used name, regardless of whether the recall was voluntary

or mandated.) Under Part 1068.505(c), manufacturers have 60 days to submit a remedial plan (VERR).

For other industries, if the recall involves 25 engines or more (one for locomotives), they must notify EPA about the recall within 15 days of the date they first started to notify engine owners.

EPA has developed a form for HD engine VERRs. As with DIRs, NR manufacturers may choose the format in which they submit VERRs. Forms for NR VERRs may be developed at a later time. Information items requested in VERRs include:

- A description of the class or category of engines being recalled
- A description of the modifications or repairs made to correct the defects
- A description of the method being used to identify and contact the owners
- A description of any conditions for eligibility for repair and any reasons for the conditions
- A description of the procedure to be followed by the owner to obtain repairs and where the repairs can be obtained
- If repairs are not being performed at dealers, a description of who will perform the repairs and where the defect will be remedied
- Copies of the letters of notification to be sent to the vehicle owners
- A description of the system for assuring an adequate supply of parts is available for the repairs and that they are performed in a timely manner.
- Copies of all necessary instructions to be sent to the persons who are to perform the repairs
- A description of the impact of the proposed changes on fuel consumption, drivability, and safety of the engines
- A sample of any labels to be applied to the participant engines identifying the recall being performed

C. VERR Progress Reports

VERR Quarterly Progress Reports (VERR updates) document the progress of voluntary (or mandated) recalls. Manufacturers must submit VERR updates for six consecutive quarters following the beginning of any recall campaign, or until all engines have been inspected, whichever comes first (Part 85.1904(b), Part 92.404(b) & Part 1068.525(b)). These reports must be submitted no later than 25 working days after the end of each calendar quarter.

Manufacturers of non-road spark-ignition engines not subject to Part 1068 need to submit only one report within 18 months of the start of owner notification (40 CFR 90.804(b)). Under Part 90.804(b), marine engine manufacturers need to submit a report one year from the start of owner notification. Other variations may exist among the different categories of engines.

HD manufacturers use a form to submit their VERR updates. For all industries, VERR update data items generally include:

- Recall campaign number
- Date of owner notification and completion
- Number of engines involved
- Number of engines known or estimated to be affected by the defect
- Number of or engines brought in and inspected as part of the campaign
- Number of engines found to have the defect after inspection
- Number of engines actually receiving repair
- Number of engines determined to be unavailable due to exportation, theft, scrapping or other reasons
- Number of engines determined to be ineligible because of improper maintenance or use
- Copies of any service bulletins sent to dealers which relate to the defect that had not previously been reported
- Copies of all communications transmitted to vehicle owners which relate to the defect to be corrected not previously submitted
- Revisions to any of the information previously submitted
- Vehicle owner contact information upon request

For non-road and marine spark-ignition engines only:

- Methods used to notify owners and dealers
- Number of engines known or estimated to be affected
- Number of engines actually being repaired
- Number of owners and dealers involved
- Number of engines determined to be ineligible because of improper maintenance or use

D. Recordkeeping Requirements

Manufacturers are required to keep records of all the data gathered to compile the reports for at least five years (Parts 85.1906(b), 90.805(b), and 91.905(b)). Recalls related to recalls under Part 1068 must be kept for at least three years after that last required report was submitted (40 CFR 1068.530). Locomotive and locomotive engine manufacturers under Part 92 however, must keep these records for eight years (40 CFR 92.406(b)). Manufacturers are required to make all records available to EPA upon request (40 CFR Parts 85.1906(b), 90.805(b), 91.905(b), and 92.406(b)).

The following information must also be maintained in a form suitable for inspection, such as electronic storage devices or databases:

- The names and addresses of vehicle or engine owners:
- To whom notification was given
- Who received remedial repair or inspection
- Who was determined not to be eligible because of improper maintenance or use

1(ii) Respondent Activities

The activities manufacturers need to perform to comply with the requirements of each type of report are as follows:

- Monitor engine performance by collecting information on the frequency of customer or dealer complaints and findings by their own research departments (customary business practice)
- Review instructions and regulations
- Compile data
- Prepare and submit report
- Maintain records

15. **The Information Collected -- Agency Activities, Collection Methodology, and Information Management**

15(a) Agency Activities

1EPA officials carry out the following activities:

- Review regulations
- Answer respondents' questions
- Review reports for completeness and compliance with regulations
- Analyze reports to determine the impact of the situation described in the report on emission levels
- Evaluate manufacturers' procedures to determine if the problem is being addressed correctly and how effective a recall campaign is
- Recommend, if needed, additional compliance activities such as further testing or research
- Identify engine classes that may need follow up in the future
- Summarize and store the information electronically

5(b) Collection Methodology and Management

EPA currently makes extensive use of electronic media in gathering and evaluating information.

For industries that must comply with defect reporting regulations found at 40 CFR Part 85, Subparts S and T (namely heavy-duty trucks and highway motorcycles), EPA has developed the following Adobe Reader-based forms:

- Form 590-301 is used for DIRs

- Form 590-300 is used for VERRs, and
- Form 590-302 is used for VER Quarterly Reports

The forms can be downloaded from <https://www.epa.gov/vehicle-and-engine-certification/report-forms-and-guidance-defects-and-recalls-under-40-cfr-part-85>. Manufacturers of NR engines may prepare reports using their own formats. Reports are then electronically submitted to OTAQ's Document Module through Verify, CD's engine and vehicle emissions data system. The data is then retrieved and uploaded by a contractor into internal defects databases. While those databases are not viewable by manufacturers or the public, additional information about VERIFY can be found at <https://www.epa.gov/vehicle-and-engine-certification/how-register-verify-system>.

5(c) Small Entity Flexibility

The information requested is the minimum needed to effectively maintain the emission control programs' integrity and comply with the requirements of the Clean Air Act. Further measures to simplify reporting requirements for small businesses do not appear prudent or necessary.

5(d) Collection Schedule

DIRs are collected on occasion only. If the defect requires a recall, a reporting scheduled is triggered. Sections 4(b)(i)(A) through 4(b)(i)(D) describe the schedule.

16. Estimating the Burden and Cost of the Collection

16(a) Estimating Respondent Burden

Table 1 (below) summarizes all respondent burden estimates. Tables 1 and 3 are also included in the Excel file that accompanies this supporting statement.

Table 1- Respondent Burden and Cost

Information Collection	Hours and Cost per Application						Total per Respondent				Total Hours and Cost for Industry			
	Engineer \$88.01	Manager \$132.91	Legal \$168.46	Clerical \$40.38	Respon. hr/yr	Labor Cost/yr	Capital Startup	O&M Cost(1)	Average Frequency	Total hr/yr	Total Cost/yr	# of Respond	Total hr/yr	Total Cost/yr
IC 1: Defect Information & Investigation Reports (DIRs)														
Review of instructions and regulations	10	8	3	0	21	\$2,448.76	\$0.00	\$0.00	1.0	21	\$ -	29	609	\$71,014.04
Compile Data	44	12	0	0	56	\$5,467.36	\$0.00	\$42.52	2.9	164	\$ 124.63	29	4,760	\$468,339.80
Prepare and submit reports	12	4	2	5	23	\$2,126.58	\$0.00	\$10.63	2.9	67	\$ 31.16	29	1,955	\$181,662.85
Review reports	3.2	1.5	1	1	7	\$689.84	\$0.00	\$0.00	2.9	20	\$ -	29	570	\$58,636.15
Recordkeeping	1	0	0	2	3	\$168.77	\$0.00	\$2.25	1.0	3	\$ 2.25	29	87	\$4,959.58
IC #2: Voluntary Emission Recall & Remediation Reports (VERRs)														
Review regulations	14	6	2	0	22	\$2,366.52	\$0.00	\$0.00	1.0	22	\$ -	7	154	\$16,565.64
Compile Data	24	5	0	0	29	\$2,776.79	\$0.00	\$42.52	2.0	58	\$ 85.04	7	406	\$39,470.34
Prepare and submit report VERR	8	5	2	3	18	\$1,826.69	\$0.00	\$10.63	2.0	36	\$ 21.26	7	252	\$25,722.48
Review report	7	3	1	1	12	\$1,223.64	\$0.00	\$0.00	2.0	24	\$ -	7	168	\$17,130.96
Prepare and submit report VERR updates	15	7	2	2	26	\$2,668.20	\$0.00	\$10.63	4.0	104	\$ 42.52	2	208	\$21,430.64
Maintain Owner Records	2	2	0	40	44	\$2,057.04	\$0.00	\$2.25	2.0	88	\$ 4.50	7	616	\$28,830.06
Recordkeeping - VERRs & VERR Quarterly Reports	1	0	0	2	3	\$168.77	\$0.00	\$2.25	2.0	6	\$ 4.50	7	42	\$2,394.28
Total per manufacturer	141	54	13	56	264	\$23,988.96	0	\$123.68	varies	varies	\$315.85	N/A	N/A	N/A
Total for the Industry	N/A	N/A	N/A	N/A	N/A	\$930,681.68	\$0.00	\$5,475.14	varies	N/A	N/A	29	9,827	\$936,156.82

16(b) Estimating Respondent Costs

(i) Estimating Labor Costs

To estimate labor costs, EPA used the Bureau of Labor Statistics' (BLS) National Industry-specific Occupational Wage Estimates (May 2016) for the Engine and Turbines Industry under Standard Industrial Classification (SIC) code 351 and increased by a factor of 2.1 to account for benefits and overhead. This information can be found at: http://www.bls.gov/oes/current/naics4_333600.htm. Mean hourly rates were used for this estimate and are listed below.

**1Table 2
Labor Costs Estimates**

Occupation	SOC Code Number	Mean Hourly Rate (BLS)	Rate Increased by a Factor of 2.1
Mechanical Engineers	17-2141	\$41.91	\$88.01
Engineering Managers	11-9041	\$63.29	\$132.91
Lawyers	23-1011	\$80.22	\$168.46
Secretaries, Except Legal, Medical and Executive	43-6014	\$19.23	\$40.38

1(ii) Estimating Capital and Operations and Maintenance Costs

Operation and Maintenance (O&M) costs are listed in Table 2. Wherever possible, estimates were developed using current costs. For others, EPA used the Bureau of Labor Statistic's Consumer Price Index Inflation Calculator, which can be found at http://www.bls.gov/data/inflation_calculator.htm. O&M Costs associated with this information collection include electronic data sharing and storage, photocopying and phone calls. CDs are used by manufacturers to submit data electronically and to keep records.

There are no capital/start-up costs associated with this collection.

(iii) Capital/Start Up Operations and Maintenance Costs

There are no capital/start-up costs associated with the renewal of this ICR.

(iv) Annualizing capital costs

There are no capital/start-up costs associated with this information collection.

16(c) Estimating Agency Burden

EPA contracts out the processing of DIRs and VERRs. The Contractor answers questions from manufacturers regarding how to prepare and submit reports, reviews reports for completeness, uploads them into a database, and identifies those that need special follow up. EPA compliance staff follow up with manufacturers in matters that require regulatory interpretation and enforce the requirements, as needed.

1Please refer to Table 3 below for detailed calculations. This table is also included in the Excel file that accompanies this collection request. Labor costs are calculated using the hourly wage rates obtained from the Office of Personnel Management and adjusted by a factor of 1.6 to account for benefits and overhead. Since the most recently available industry labor rates are those of 2016 [see section 6(b)(i)], EPA has also used 2016 government labor rates for comparison purposes.

Table 3 - Annual Agency Burden and Cost HD/NR Defects Program								
Employee	Hours and Labor Cost							
	Level	Rate	Rate Increase by 1.6	Number of Employees	Full time hours	% of Time	Total hr/yr	Total Labor cost/yr
Engineer/Manager	GS-14/1	\$52.17	\$135.64	1	2080	3.0%	62.4	\$8,464
Engineer	GS-13/1	\$44.15	\$114.79	1	2080	7.0%	145.6	\$16,713
Contracts	GS-13/1	\$44.15	\$114.79	1	2080	0.5%	10.4	\$1,194
Attorney	GS-13/1	\$44.15	\$114.79	1	2080	1.0%	20.8	\$2,388
Managers	GS-15/1	\$61.37	\$159.56	1	2080	3.0%	62.4	\$9,957
SES-1	SES - 1	\$96.01	\$249.63	1	2080	0.5%	10.4	\$2,596
IT Support	GS-12/1	\$37.13	\$96.54	1	2080	0.5%	10.4	\$1,004
Contract Support	N/A	\$29.17		----	----	----	268.75	\$7,839
Subtotal				7	N/A	N/A	591	\$ 50,155
O&M Costs								
Contract Support	N/A	\$29.17		----	----	----	268.75	\$7,839
Other								\$5,000
SEE Support								\$2,000
IT Contract Support - FM Pro								\$0
IT Contract Support -VERIFY								\$2,000
							Subtotal:	\$ 16,839
							TOTAL:	\$ 66,995

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

Engine manufacturers need to submit defect-related reports only when they learn that a significant number of properly maintained engines are affected by a particular defect. Therefore, not all manufacturers that obtain certificates of conformity with emission regulations will respond to this collection every year.

Based on response levels during the past three years, 1EPA expects to receive approximately 65 reports annually, (40 DIRs, 15 VERRs and 10 VERR updates) during the next three years. This is consistent with previous estimates although the number of respondents has decreased from 40 to 19. This yields an average of 3.4 responses per respondent.

16(e) Bottom Line Burden Hours and Cost Tables

(i) 1Respondent Tally

- Number of Respondents: 29
- Total Hours per Year: 9,827
- Total Labor Cost per Year: \$930,682
- Total Capital Costs per Year: 0
- Total O&M Costs per Year: \$5,475
- Total Costs: \$936,157

(ii) 1The Agency Tally

- Number of Respondents: 29
- Total Hours per Year: 591
- Total Labor Cost per Year: \$50,155
- Total Capital Costs per Year: 0
- Total O&M Costs per Year: \$16,839
- Total Costs: \$66,995

16(f) Reasons for change in burden

There is a net decrease of 5,258 hours in the total estimated burden for ICR 0282.17 from the burden currently identified in the OMB Inventory of Approved ICR Burdens of 15,084 for ICR Number 0282.16. This decrease is largely due to a correction of a mistake found in the previous calculations. Under ICR 0282.16, EPA estimated that 40 respondents would submit a total of 40 DIRs (see Section 6(d), page 14 of 0282ss16 8_6_2014.docx which can be retrieved at https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=201310-2060-005), equal to one DIR per respondent per year. However, the burden table reflects that 40 respondents would submit DIRs 3 times per year (for an example, see cells J9 and M9 in Excel file 0282t16.xlsx) which yields 120 reports per year (40 x 3). Therefore, burden calculations were based on 3 times the amount of reports as it should have. A similar mistake was made in the calculations related to

VERR and VERR updates. Had the correct frequency of 1.0 been used (in cells J8 through J24), the total estimated burden would have been 6,493 hours per year or 3,334 hours less than current estimates. The difference between the corrected estimate and the new estimate is due to the increase in the total number of responses (65 vs. 107).

16(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection is estimated to average 92 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 currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2013-0246, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), WJC Federal Building 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 and Radiation 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, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. EPA-HQ-OAR-2013-0246 and OMB control number 2060-0048 in any correspondence.