SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY

NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) (Renewal), EPA ICR Number 2066.07, OMB Control Number 2060-0483.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) were proposed on May 14, 2002, and promulgated on May 27, 2003. These regulations apply to either 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 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 PPPPP.

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

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents, and retain the file for at least five years following the generation date of such maintenance reports and records. All reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

There are approximately 19 Engine Test Cells/Stands facilities. Three of the 19 facilities in the United States are owned by the Federal government[1]. The remaining are all owned and operated by privately-owned, for-profit businesses. The "burden" to the "Affected Public" may be found below in both Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) (Renewal) and Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Engine Test

1 We assume all 3 federal facilities are operated by Federal government employees.

Cells/Stands (40 CFR Part 63, Subpart PPPPP) (Renewal). The "burden" to the Federal government is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP), (Renewal). We assume that they will all respond to EPA inquiries.

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

Over the next three years, approximately 18 existing respondents per year will be subject to these standards, and one additional respondent (private facility) is expected to become subject to these same standards, over the three-year period for a total of 19 respondents.

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

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 either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart PPPPP.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards 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 standards. Continuous emission monitors are used to ensure compliance with these standards 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 these 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, leaks are being detected and repaired, and that the standards are 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, duplication does not exist.

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 (82 FR 29552) on June 29, 2017. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source

of information as reported by industry, in compliance with the recordkeeping and reporting provisions in these standards, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 19 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the National Marine Manufacturers Association, at (312) 946-6231, and The Truck and 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 these 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 same 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 these 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 would be prevented from pursuing the violators due to either 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 these standards 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.

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

Standard (40 CFR Part 63, Subpart PPPPP)	SIC Codes	NAICS Codes
Motor Vehicle Transmission and Power Parts Manufacturing	3714	336350
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 either recorded or reported is required by the NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP).

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 (including reports of deviations)	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)
SSM Plan (only for control devices, not for engine test cells)	63.9305(c)
Inspection and maintenance plan for catalytic oxidizers, if applicable	63.9324(b)(4)

A source must keep the following records:

Recordkeeping	
Maintain records of emission test results and other data needed to	63.9355(a)(4-7)

Recordkeeping	
determine compliance with emission limitation	
Maintain records of all reports and notifications	63.9355(a), 63.10(b)
Maintain records of applicability	63.10(b)(3)
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 of each control device malfunction.	63.9355(3)
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.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for temperature, air flow direction, air facial velocity, pressure drop across enclosure, gas flowrate, duct static pressure, carbon monoxide or total hydrocarbon concentrations, adjusted for oxygen. The exact CMS requirements will depend on the control device used or the emission limit the unit is complying with.
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.

Respondent Activities
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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 Enforcement and Compliance History Online (ECHO) and ICIS.

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 reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial

and government-owned facilities. EPA uses ICIS 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

There are no small entities (i.e., small businesses) affected by this regulation.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in both Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) (Renewal) and Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) (Renewal).

6. Estimating the Burden and Cost of the Collection

Tables 1a and 1b document 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 neither conduct nor 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 2,150 hours (Total Labor Hours from Tables 1a and 1b below; see also the summary of burden in Table 1c). 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

For private facilities, this ICR uses the following labor rates:

Managerial	$149.35 ($71.12 + 110%)
Technical	$112.98 ($53.80 + 110%)
Clerical	$54.81 ($26.10 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, "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.

For Federal facilities, this ICR uses the following labor rates:

Managerial	$64.80 (GS-13, Step 5, $40.50 + 60%)
Technical	$48.08 (GS-12, Step 1, $30.05 + 60%)
Clerical	$26.02 (GS-6, Step 3, $16.26 + 60%)

These rates are from the Office of Personnel Management (OPM), 2017 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees

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

The type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulations and include the cost to purchase monitors. 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						

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	1	$500	$300	19	$5,700

Note: Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are $500. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are $5,700. 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 $6,200. These are the record-keeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes such activities 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 $8,130.

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

Managerial	$64.80 (GS-13, Step 5, $40.50 + 60%)
Technical	$48.08 (GS-12, Step 1, $30.05 + 60%)
Clerical	$26.02 (GS-6, Step 3, $16.26 + 60%)

These rates are from the Office of Personnel Management (OPM), 2017 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal 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 these standards. It is also estimated that one additional respondent will become subject to these same standards over the same three-year period. The overall average number of respondents, as shown in the table below, is 19 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	1	18	0	0	19
2	0	19	0	0	19
3	0	19	0	0	19
Average	0.3	19	0	0	19

[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 19.

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	19	2	0	38
Initial notifications	1	0.3	0	0.3
Notification of construction/reconstruction	1	0.3	0	0.3
Notification of actual startup	1	0.3	0	0.3
Start-up Shutdown and Malfunction Plan	1	0.3	0	0.3
Performance evaluation report	1	0.3	0	0.3
			Total	**40**

The number of Total Annual Responses is 40.

The total annual labor costs are $198,000. Details regarding these estimates may be found below in both Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) (Renewal) and Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) (Renewal); see also the summary in Table 1c.

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 below in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 2,150 hours. Details regarding these estimates may be found below in both Table 1a: Annual Respondent Burden and Cost for Private Facilities – NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) (Renewal) and Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) (Renewal); see also the summary in Table 1c.

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 54 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are $6,200. 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 173 labor hours at a cost of $8,130; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens

are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

6(f) Reasons for Change in Burden

There is an increase in the total estimated burden, number of responses, and Capital/Startup and O&M costs from the most recently approved ICR due to several adjustments. First, based on consultations with internal Agency experts, there is an increase in the number of new sources. This renewal reflects burden for an increase in the total number of sources and incorporates burden for one-time requirements for the new source. Second, this renewal includes time for each affected facility to review rule requirements each year.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 54 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 neither conduct nor 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), WJC 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 1a: Annual Respondent Burden and Cost for Private Facilities– NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) (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. Familiarization with regulatory requirements [a]	4	1	4	16	64	3.2	6.4	$8,059.42
B. Notifications [c]								
Initial notifications	2	0.3	0.6	1	0.6	0.03	0.06	$75.56
Notification of construction/ reconstruction	2	0.3	0.6	1	0.6	0.03	0.06	$75.56
Notification of actual startup	2	0.3	0.6	1	0.6	0.03	0.06	$75.56
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
Start-up Shutdown and Malfunction Plan [d]	20	0.3	6	1	6	0	1	$755.57
Compliance status report [e]	4	2	8	16	128	6	13	$16,118.85
Performance evaluation report	16	0.3	4.8	1	4.8	0.2	0.5	$604.46
Subtotal for Reporting Requirements					***235***			***$25,765***
4. Recordkeeping requirements								
A. Initial performance evaluation [f]	330	0.3	99	1	99	5.0	9.9	$12,466.92
B. Monitoring demonstration [g]	148	0.3	44.4	1	44.4	2.2	4.4	$5,591.23
C. Repeat performance evaluation [h]	330	1	330	0	0	0	0	$0
D. Maintain records of CEMS performance [i]	1.5	52	78	16	1248	62.4	124.8	$157,158.77

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]
Subtotal for Recordkeeping Requirements					***1,600***			***$175,217***
TOTAL LABOR BURDEN AND COST (rounded)[j]					**1,840**			**$201,000**
Total CAPITAL and O&M COST (rounded)[j]								**$5,300**
GRAND TOTAL (rounded)[j]								**$206,000**

Assumptions:

[a] We have assumed that the average number of private sources subject to the rule will be 15, and that one new facility will become subject to the rule over the three-year period of this ICR. This ICR assumes that all sources will incur a burden to re-familiarize themselves with the regulatory requirements each year.

[b] This ICR uses the following labor rates: $149.35 per hour for Managerial labor; $112.98 per hour for Technical labor, and $54.31 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, 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 one new or reconstructed source over the next three years.

[d] We have assumed that the one new source will use controls to comply with the standard and therefore the one-time SSM plan requirement will occur during this ICR period. We have assumed that this one new source will not develop a site-specific monitoring and inspection plan for catalytic oxidizer controls.

[e] Compliance status reports are required semiannually. We have assumed that deviations get reported as part of the semiannual compliance status report. We have assumed that all of the sources that had an SSM of a control device was consistent with the SSM plan and therefore no separate SSM report burden is estimated.

[f] 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).

[g] Since there is only one new respondent, we have assumed that it will not have to repeat the performance evaluations due to failure.

[h] We have assumed that owners and operators will maintain monitoring records on a weekly basis.

[i] We assume all of the recordkeeping and reporting burden from the rule at federal facilities will be conducted by federal employees.

[j] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 1b: Annual Respondent Burden and Cost for Federal Facilities – NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) (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. Familiarization with regulatory requirements [c]	4	1	4	3	12	0.6	1.2	$647.06
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 actual startup	2	1	2	0	0	0	0	$0
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
Start-up Shutdown and Malfunction Plan [c]	20	0.3	6	0	0	0	0	$0
Compliance status report [d]	4	2	8	3	24	1.2	2.4	$1,294.13
Performance evaluation report [e]	16	1	16	0	0	0	0	$0
Subtotal for Reporting Requirements					***41***			***$1,941***
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
D. Maintain records of CEMS performance [i]	1.5	52	78	3	234	11.7	23.4	$12,617.75

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]
Subtotal for Recordkeeping Requirements [k]					***269***			***$12,618***
TOTAL LABOR BURDEN AND COST (rounded)[k]					**310**			**$14,600**
Total CAPITAL and O&M COST (rounded)[k]								**$900**
GRAND TOTAL (rounded)[k]								**$15,500**

Assumptions:

[a] We have assumed that the average number of existing Federal sources subject to the rule will be 3, and that no new Federal facilities will become subject to the rule over the three-year period of this ICR. This ICR assumes that all sources will incur a burden to re-familiarize themselves with the regulatory requirements each year.

[b] This cost is based on the following hourly labor rates, increased by 60% to account for the benefit packages available to government employees: $64.80 for Managerial (GS-13, Step 5, $40.50+60%), $48.08 for Technical (GS-12, Step 1, $30.05 + 60%) and $26.02 Clerical (GS-6, Step 3, $16.26 + 60%). These rates are from the Office of Personnel Management (OPM) "2017 General Schedule" which excludes locality rates of pay.

[c] We have assumed that there will be no new or reconstructed Federal sources over the next three years.

[d] Compliance status reports are required semiannually. We have assumed that deviations get reported as part of the semiannual compliance status report. We have assumed that all of the sources that had an SSM of a control device was consistent with the SSM plan and therefore no separate SSM report burden is estimated.

[e] We have assumed that no Federal respondents need to conduct the initial performance evaluation, since there are no new or reconstructed Federal sources over the next three years.

[f] We have assumed that no Federal respondents need to keep records for initial performance evaluation related activities, since there are no new or reconstructed Federal 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] Since there are no new respondents, it is assumed no respondents will have to repeat the performance evaluations due to failure.

[i] We have assumed that owners and operators will maintain monitoring records on a weekly basis.

[j] We assume all of the recordkeeping and reporting burden from the rule at federal facilities will be conducted by federal employees.

[k] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector– NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) (Renewal)

Affected Sector	Number of Responses	Labor Hours			Labor Costs	Capital/Startup and O&M Costs
		Reporting	Recordkeeping	Total		
Private	34	235	1,600	1,840	$183,000	$5,300
Public (Federal)	6	41	269	310	$14,600	$900
Total	***40***	***276***	***1,869***	***2,150***	***$198,000***	***$6,200***

Table 2: Average Annual EPA Burden and Cost - NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart PPPPP) (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	0.3	9.6	1	9.6	0.48	0.96	$517.65
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	$3,451.01
4. Reporting requirements								
a. Review waivers [d]	2	2	4	0	0	0	0	$0
b. Review reports								
Review initial notifications	2	0.3	0.6	1	0.6	0.03	0.06	$32
Compliance status report [e]	2	2	4	19	76	3.8	7.6	$4,098.07
Performance evaluation report	2	0.3	0.6	1	0.6	0.0	0.06	$32.35
Subtotals Labor Burden and Cost					150.8	7.54	15.08	$8,131.44
TOTAL ANNUAL BURDEN AND COST (rounded)[f]					**173**			**$8,130**

Assumptions:

[a] We have assumed that the average number of existing sources subject to the rule will be 18, and that one new facility will become subject to the rule over the three-year period of this ICR. That facility is not assumed to require repeat performance evaluation testing.

[b] This cost is based on the following hourly labor rates, increased by 60% to account for the benefit packages available to government employees: $64.80 for Managerial (GS-13, Step 5, $40.50+60%), $48.08 for Technical (GS-12, Step 1, $30.05 + 60%) and $26.02 Clerical (GS-6, Step 3, $16.26 + 60%). These rates are from the Office of Personnel Management (OPM) "2017 General Schedule" which excludes locality rates of pay.

[c] We have assumed that 20 percent of all respondents will be out of compliance.

[d] We have assumed that none of the respondents are submitting waivers for recordkeeping and reporting requirements.

[e] Compliance status reports review is required semiannually. We assumed that deviations get reported as part of the semiannual compliance status report.
[f] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.