

Supporting Statement
for
Information Collection Request

On-Highway Motorcycle Certification and Compliance Program (Renewal)

OMB Control Number 2060-0710

EPA ICR Number 2535.02

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

Part A of the Supporting Statement

Section 1: Identification of the Information Collection

1(a) Title and Number of the Information Collection

On-Highway Motorcycle (HMC) Certification and Compliance Program (Renewal); EPA ICR Number: 2535.02; OMB Control Number: 2060-0710.

1(b) Short Characterization/Abstract

Under the Clean Air Act (42 U.S.C. 7521 et seq.) manufacturers and importers of on-highway motorcycles must have a certificate of conformity issued by the EPA covering any vehicle they intend to offer for sale in the United States. A certificate of conformity represents to the prospective purchaser that the respective vehicle conforms to all applicable emissions requirements. In issuing a certificate of conformity, the EPA reviews vehicle information and emissions test data to determine if the required testing has been performed by the certificate applicant and the required emissions levels have been demonstrated. After a certificate of conformity has been issued, the Agency may request additional information to verify that the product continues to meet its certified emissions standards throughout its useful life.

The burden under this HMC ICR covers the application for a certificate of conformity (and supporting test results) submitted by HMC certification applicants prior to introduction into US commerce as well as various reports and information during and after production; but includes the defect information report (DR) and voluntary emissions recall report (VERR) that may not be applicable to manufacturers unless certain conditions are met. The EPA's processing of this information is conducted by the Compliance Division, Office of Transportation and Air Quality, Office of Air and Radiation, US EPA. Since the last ICR was submitted, there have been no changes to the on-highway motorcycle program. However, the EPA has developed several templates that manufacturers may use to meet their reporting obligations.

Information collected for the purposes listed above consists of descriptions of on-highway motorcycles (with emphasis on emission control systems), test results, defect and recall reports (if any), and sales information. These data are reviewed to verify that the necessary tests have been performed and the manufacturer's product line complies with emission standards throughout its useful life.

Section 2: Need for and Use of the Collection

2(a) Need/Authority for the Collection

Under Title II of the Clean Air Act (42 U.S.C. 7521 et seq.), the EPA is charged with issuing certificates of conformity for motor vehicle designs that comply with applicable emission

standards set under section 202(a)(1) of the Act, such as those for Carbon Monoxide (CO), Hydrocarbons (HC) and Oxides of Nitrogen (NOx). (This authority was clarified in the Supreme Court's decision *State of Massachusetts v. EPA*, 127 S. Ct. 1438 (2007)). Section 202(a)(1) states that "the Administrator shall by regulation prescribe (and from time to time revise) [...] standards applicable to the emission of any air pollutant from any class or classes of new motor vehicles [...], which in his judgment cause, or contribute to, air pollution which may reasonably be anticipated to endanger public health or welfare." Under Section 206(a) of the Clean Air Act (42 U.S.C. 7525) "... The Administrator shall test ... any new motor vehicle ... submitted by a manufacturer ... If such vehicle ... conforms ... the Administrator shall issue a certificate of conformity." While the EPA has delegated a substantial portion of the process of calculating and reporting emissions and fuel economy results to the manufacturers, the test results upon which labels are based are subject to EPA confirmatory testing. Such confirmation testing makes sure that results from different manufacturers can be accurately used for comparison.

Relevant portions of the above statutes can be found online at <https://www.epa.gov/clean-air-act-overview/title-ii-emission-standards-moving-sources>. The regulations dealing with on-highway motorcycle emission control can be found in 40 CFR Parts 85 and 86. These regulations are not attached to this statement due to their length and technical nature but may also be found on-line at www.ecfr.gov.

2(b) Practical Utility/Users of the Data

The Clean Air Act directs the EPA to promulgate regulations for the control of exhaust and crankcase emissions from new motorcycles. Under 40 CFR Part 85 and 86, the EPA has promulgated regulations to provide for the certification that new highway motorcycles meet emissions standards for certain exhaust emissions and continue to comply with those emissions standards throughout the useful life of the vehicle. The EPA gathers the following data to assess the compliance of vehicles at the time of certification and establishes certain reporting and recordkeeping requirements to monitor compliance from those certified vehicles.

Highway Motorcycles Certification and Compliance

The EPA requires manufacturers to provide various pieces of information in their certification applications that detail the manufacture and emissions control devices on the motorcycle. These requirements, such as adjustable parameters for engine control and operation, aftertreatment devices, engine air aspiration, auxiliary emissions control devices, etc; and emissions test data verifying these emissions control devices will meet the emissions standards under the motorcycle regulations. We may verify by inspection and subsequent testing whether the appropriate test cycle was performed and whether the engine complies under the regulations. In addition, manufacturers must report the actual sales of every vehicle and, if requested, provide a production vehicle so the EPA may verify that the vehicles covered by the certificate of conformity perform as certified.

Defect Reports and Voluntary Emissions Recall Reports

EPA's authority to require manufacturers that have been issued certificates of conformity to report on compliance issues with in-use products is derived from EPA's Clean Air Act § 208 authority. The EPA relies on manufacturers' existing feedback on the in-use performance of their products from a number of sources, most notably from their warranty claims systems. The purpose is to allow the EPA to assess whether a manufacturer is meeting its obligations under the Act including determinations of noncompliance. The defect provisions under 40 CFR Part 85, subpart T require manufacturers to report a "defect" exceeding a certain number of vehicles to the EPA and provide a remedy. Manufacturers may seek to cure the "defect" using the Voluntary Emissions Recall provisions under 40 CFR Part 85, subpart S, using the reporting requirements under that regulation. Both the defect reporting requirement and the voluntary emissions recall reporting requirement allow the EPA to receive information on how manufacturers continue to comply with the emissions of their products not just at the time of certification, but throughout the useful life of the product.

Investigation into Possible Noncompliance of HMCs

The HMC emissions compliance program includes pre-production, production, and in-use components. HMCs are evaluated as prototypes prior to production, and those designs that meet applicable criteria are certified for introduction into commerce. The EPA also has discretion to conduct production vehicle testing. While, this has become an important compliance tool for the EPA, no significant burden is assigned to this activity in this ICR due to the very limited nature in which this tool is used. Finally, in addition to the manufacturer voluntary recall program, the EPA will follow up on information shared with the Agency by other administrative and state agencies, such as California's Air Resources Board and Environment and Climate Control Canada, to investigate vehicle compliance.

EV-CIS

Electronic submission by manufactures to the EPA's Engine and Vehicle Compliance Information System known as EV-CIS began to be implemented for on-highway motorcycles in 2015; previously manufacturers entered information in EPA's Verify system. All reporting covered by this ICR may be entered and submitted electronically via the EPA's web-based Engines and Vehicles Compliance Information System, EV-CIS. The EV-CIS system features a web interface for the submission of manufacturer certification information. Subject to confidentiality claims, this information is made available to interested parties upon request. Emission test information and some recall notifications are available on the Internet.

Averaging Program for HC+NOx

To provide flexibility in meeting the on-highway motorcycle emissions standards, we adopted an emission credit program that provided an early incentive for HMC manufacturers to bank credits for use in future model years while retaining the ability to average emissions across engine families. Under the averaging program, manufacturers can balance the certified emissions of their motorcycles so that the sales-weighted emissions level meets the applicable standard. This

means that some engine families may have emissions below the standards while others have emissions higher than the standards. For enforcement purposes, manufacturers are required to specify a certification limit, or “Family Emission Limit” (FEL), for each engine family. The FEL is the emission level that a particular engine family is certified as meeting and, in effect, becomes the standard for the individual family. The FEL may be above or below the applicable standard if the manufacturer’s sales-weighted emissions average meets the applicable standard. Manufacturers participating in the averaging program (promulgated under 40 CFR 86.449), must certify each participating family to a FEL in its application for certification. In its application, participants must also project an average emission level for all families participating in the program. At the end of the model year, each participant must submit an end-of-year report accounting for the actual production volume, calculated to final average to demonstrate compliance with the standard. This report must be received by the EPA within 120 days of the end of the model year. This reporting requirement is a necessary component of the averaging program.

Section 3: Non-duplication, Consultations, and Other Collection Criteria

3(a) Non-duplication

Almost all information requested from respondents under this ICR is required by statute and, in most cases, is not available from other sources. Due to the specialized nature of HMC manufacturing and the fact that product plans and emission performance information may be submitted to the EPA prior to the introduction of production vehicles into US commerce, this information is not available from any source other than the manufacturer. Therefore, this information is not likely to be collected by any other governmental agency for this or related purposes.

3(b) Public Notice

EPA issued a Federal Register Notice on November 4, 2019 (84 FR 59375). No relevant comments were received.

3(c) Consultations

In preparing this ICR submission, the EPA has consulted with the following individuals working in the regulated industries:

<u>Name</u>	<u>Firm</u>	<u>Telephone</u>
<u>Scott Bollinger</u>	<u>Harley-Davidson Motor Company</u>	<u>(414) 465-6058</u>
<u>Larry Keller</u>	<u>Polaris Industries Inc.</u>	<u>(651) 408-7253</u>
<u>Margaret Goldstein</u>	<u>Harrison Wolf</u>	<u>(714) 841-6400</u>

The EPA has had informal conversations with Harrison Wolf concerning labor hour determination for the respondents to this ICR. Harrison Wolf serves as a certification consultant to multiple manufacturers, covering diverse products, both physical and technological. On September 16-19, 2019, EPA conducted a Compliance Workshop for manufacturers certifying small engines, including highway motorcycle manufacturers. The workshop provided opportunities for the regulated industries to receive information from the EPA regarding certification, reporting and recordkeeping obligations and to interact with the Agency concerning EPA's emissions programs. The EPA Compliance Division received positive feedback concerning the workshop and were provided perspectives from industry practitioners regarding benefits and challenges to EPA's certification programs. No additional comments were made concerning this ICR renewal at that time.

3(d) Effects of Less Frequent Collection

As required by the Clean Air Act (42 USC 7525(a)), manufacturers must submit emission information to the EPA on an annual basis coinciding with the manufacturer's "model year."¹ The EPA allows applicants to define their own "model year", within limits under the statute and regulations, thus granting some flexibility in this regard. Major product changes typically occur at the start of a model year. For these reasons, a collection frequency longer than a model year is not possible. However, when a vehicle design is unchanged for subsequent model years the regulations allow manufacturers to certify using the data generated from the preceding year's certification. The use of previous data is often referred to as "carry over" of data to a subsequent model year, and as a result the amount of new information required for certification is substantially reduced.

3(e) General Guidelines

Manufacturers are required to keep some records for periods longer than three years. This requirement stems from the statutory requirement that manufacturers warrant some items for periods longer than three years. Manufacturers must also recall vehicle classes failing to meet emission standards during their useful life -- typically five to eight years depending on vehicle type. In order to satisfy these obligations, manufacturers must retain product information, with particular emphasis on the emission control systems. This information is vital in assuring that repairs and replacement parts properly function during the life of the warranty and that emissions limitations are met during the full useful life. The EPA believes that this recordkeeping requirement does not impose an unreasonable burden given the warranty and recall obligations. In fact, manufacturers would probably retain this information to support their normal business of supplying replacement parts.

This information collection activity otherwise complies with the remaining guidelines in 5 CFR 1320.5.

3(f) Confidentiality

¹ The term "model year" is defined under 40 CFR § 86.402-78(a); "*Model year* means the manufacturer's annual production period (as determined by the Administrator) which includes January first of such calendar year. If the manufacturer has no annual production period, the term model year shall mean the calendar year.

Information submitted by manufacturers is held as confidential until the specific vehicle to which it pertains is available for purchase. After vehicles are available, most information associated with the manufacturer/importer’s application is available to the public. Under section 208 of the Clean Air Act (42 USC 7542(c)) all information, other than trade secret processes or methods, must be publicly available unless a class determination made by EPA’s Office of General Counsel determines otherwise. Proprietary information is granted confidentiality in accordance with the Freedom of Information Act, 5 U.S.C. Section 552, and EPA regulations at 40 CFR Part 2 Subpart B.

3(g) Sensitive Questions

No sensitive questions are asked in this information collection. This collection complies with the Privacy Act and OMB Circular A-108.

Section 4: Respondents and Information Requested

4(a) Respondents/NAICS Codes

The respondents are involved in industries that manufacture or introduce into commerce highway motorcycles shown in the following table:

Category	NAICS Codes ^A	Examples of Potentially Regulated Entities
Industry	336991	Motorcycle, Bicycle, and Parts Manufacturing
Industry	336310	Motor Vehicle Gasoline Engine and Engine Parts Manufacturing

^A North American Industry Classification System (NAICS)

4(b) Information Requested

(i) Data items

Manufacturers of on-highway motorcycles are required to submit descriptions of their planned product line, including detailed descriptions of the emission control system, test data, and demonstrations of compliance with other requirements, such as methods for determining deterioration factors for durability and permeation standards for tanks and fuel lines. Manufacturers supply test data to verify that their products will comply with the emission standards. They are also required to notify the EPA of in-use defects experienced by their vehicles and report voluntary recall plans and progress. Other major data items include copies of warranties; and averaging and banking calculations (where required); and production reports after the end of the model year.

(ii) Respondent Activities

All manufacturers must describe their product(s) and supply test data and other information to verify compliance with EPA’s regulations and emissions standard. Small Manufacturers may

provide less information at the time of certification but must still retain their data if the EPA requests that information at a later date. Additional Information regarding manufacturer reporting and recordkeeping requirements may be found in the IC Reporting Spreadsheet in the Appendix.

- (1) A manufacturer should include in a single application for certification, a description of all vehicles in each class/engine family for which certification is required. A manufacturer may, however, choose to apply separately for certification of part of its product line. The selection of test vehicles and the computation of test results will be determined separately for each certification application.
- (2) The application shall be in writing signed by an authorized representative of the manufacturer, and shall include the following:
 - Identification and description of the vehicles covered by the application and a description of their engine, emission control system and fuel system components. This shall include a detailed description of each auxiliary emission control device.
 - Transmission gear ratios,
 - overall drive ratios and vehicle mass (or range of mass)
 - The label and its location shall be specified, §86.413.
 - Available optional equipment shall be described.
 - The range of available fuel and ignition system adjustments.
 - Projected U.S. sales data sufficient to enable the Administrator to select a test fleet representative of the vehicles for which certification is requested. If reduced testing based on low sales volume is requested the method of predicting sales shall be described.
 - A description of the test equipment (if applicable) and fuel and engine lubricant proposed to be used.
 - A description of the proposed service accumulation procedure and a description of the proposed scheduled maintenance.
 - A statement of recommended periodic and anticipated maintenance and procedures necessary to assure that the vehicles covered by a certificate of conformity in operation conform to the regulations, listings of the fuels and lubricants to be recommended to the ultimate purchaser and a description of the program for training of personnel for such maintenance, and the equipment required to perform this maintenance.
 - A description of normal assembly line operations and adjustments if such procedures exceed 100 km (62 miles) or three hours of engine operations.
 - A description of the evaporative emission controls and applicable test data.
 - The name of an agent for service of process located in the United States. Service on this agent constitutes service on you or any of your officers or employees for any

action by EPA or otherwise by the United States related to the requirements of this part.

- The EPA may conduct a limited number of “confirmatory tests” to monitor manufacturer test results. This generally requires that emissions test vehicle(s) be shipped by the certifying manufacturer to the EPA’s designated testing laboratory.

(3) Manufacturers must also submit reports concerning defects that exceed a regulatory minimum number of production vehicles and voluntary recalls, if instituted by the manufacturer, conducted; they may also be requested to submit to production vehicle testing that the EPA may elect to conduct.

(4) Manufacturers must also retain records. These tasks are repeated for each model year, although typically previous data and information can be used when no significant changes have occurred from the previous model year. If, during a model year, a product change is made (an “amendment” to an application or certified configuration), the EPA must be notified. Under some circumstances EPA may require additional test data.

Section 5: The Information Collected—Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

The EPA is required under the Clean Air Act to collect information and issue certificates of conformity for highway motorcycles that meet emissions requirements at the time of certification and throughout the useful life of a vehicle. To perform EPA’s function under the Act and our regulations, the EPA collects certification information from the regulated community to assess whether a vehicle meets the emissions standard. That information would consist of all vehicle engine and emissions designs, auxiliary emissions control devices (AECD’s), adjustable parameters, emissions control devices and related aftertreatment technologies, all test data, model year production, averaging calculations, and contact persons. These data elements must be both collected and analyzed by the EPA to assess whether manufacturers and their vehicles are complying and continuing to comply with meeting these emission standards throughout their useful life. help the EPA to determine how a vehicle will meet the emissions standards. Therefore, a significant portion of the EPA’s emission compliance activity is spent reviewing applications to verify that the correct vehicle tests have been conducted and necessary information submitted. Amendments to applications must also be selectively reviewed for possible emissions impacts and manufacturers’ evaluations thereof. This is also part of the certification review process of an application even after a certificate has been granted. Another part of this process involves determining if the use of data from a previous model year is appropriate or if new testing will be required. The EPA also selects a number of vehicles for confirmation at an EPA designated test facility. In addition to certificate application and test data review, the EPA also maintains the relevant reporting system (EV-CIS) and analyzes relevant data for regulatory development and compliance oversight purposes.

The EPA prepares annual reports of emission test results submitted by the manufacturers. These and other reports, data and information are now available on the EPA’s website at <https://www3.epa.gov/otaq/crtst.htm>.

5(b) Collection Methodology and Management

All routine information (test results, vehicle descriptions, and all aspects of certification applications) is electronically transmitted directly from the manufacturers through the EV-CIS system.

All information received by the EPA is subject to review. Data submitted electronically is in some cases automatically screened; for example, on-highway motorcycle test results that are close to the emission standard(s) are flagged for a more detailed review. Descriptions of the proposed product line are checked with EV-CIS submissions to make certain that the appropriate vehicles have been tested. (The emission program relies on a combination of “worst case” and representative data to accomplish its goals.)

5(c) Small Entity Flexibility

The EPA has special procedures for small-volume on-highway motorcycle manufacturer certifications; i.e., those whose total sales are less than 10,000 units per year. These special procedures allow the “small-volume” manufacturer to submit a simplified application for certification with respect to durability demonstrations. These manufacturers also have reduced testing and reporting requirements. Further, by the very nature of their size, small volume manufacturers typically have very limited product lines. This characteristic both reduces the amount of information that must be submitted and simplifies the process of selecting the correct test vehicle(s). There are also several special provisions to reduce the regulatory burden on small highway motorcycle manufacturers; in addition to hardship exemptions and program delays, manufacturers with sales less than 3000 units per year and 500 employees may use broader definitions of engine categories to group more engine families under one certification application. This may result in fewer certification fees and less certification testing cost.

5(d) Collection Schedule

Manufacturers must submit information for each “model year” that it intends to build (or import) vehicles. Submission is by “engine family” designation. A “model year” approximates when a product is produced. Engines and vehicles can be designated the next model-year if manufactured by January 2 of the preceding calendar-year. For instance, a 2019 model year engine or vehicle can be produced from January 2, 2018 through December 31, 2019. If a product is unchanged between model years, much of the information can be carried over to the new model year application. The collection frequency and burden are determined to a large extent by the manufacturer’s marketing and production plans. However, as required by law, some submission is required for each model year’s production.

Section 6: Estimating the Burden and Cost of the Collection

6(a) Estimating Respondent Burden

The burden estimates below consider the HMC program described above in section 4.

In agreement with this ICR, each manufacturer's activities toward certification or a related reporting or record keeping requirement is counted as a "response". As explained in support of that action, this is by far the most logical and tractable unit of activity for burden accounting.

Within the HMC program, the estimation of respondent burden hours and respondent costs essentially breaks down as testing costs, which constitute the majority of Operations and Maintenance; testing facilities costs, which constitute the majority of Startup and Capital; the labor hours to conduct the tests; and additional costs and hours associated with other reporting and recordkeeping burdens, including amendments to a certificate of conformity and compliance testing responses. In addition, some features are specific to particular programs (notably permeation testing).

This ICR has been updated to reflect certification information over the previous three years, assessing the most accurate information for our estimates under this ICR. The data used in this ICR may be found on the EPA website at <https://www3.epa.gov/otaq/crttst.htm>.

The present burden estimate continues the process of updating based on a renewed examination of the burdens, consultations with industry, and consultations with program administrators within the EPA. The Respondent hours reflected in this ICR represent EPA's most recent and continuing conversation with industry contacts and informal conversations with industry practitioners through the certification and compliance process.

To calculate reporting and recordkeeping burdens we start with the burden of submitting information to the EPA and storing that information, then we consider the costs of developing the information that must be reported. Consequently, this ICR has traditionally included the burden of conducting tests that have to be reported to support the EPA's oversight of compliance with the Clean Air Act. We take the cost of conducting the tests to include contracting the cost of testing to outside test laboratories, the capital costs of building the facilities to run the tests, if applicable, and the associated operations and maintenance costs in support of such facility(s), as well as the service mileage accumulation for durability determinations, and labor costs associated with performing all of these functions. All calculations are provided in the highway motorcycle spreadsheet in the Appendix (titled: "HWY MC Worksheet_2020").

Previously, we have provided estimates of *responses* that have reflected *respondents* to the ICR. As an example, the preceding ICR stated there were 74 responses, which were actually the number of respondents. For this ICR we have corrected that oversight and now reflect both the total number of respondents (55) and the total number of responses (929) for highway motorcycles. The total 929 responses cover all certification, reporting and record keeping requirements for the respondents seeking certification with the EPA for highway motorcycles. The chart below now reflects these calculations for this ICR moving forward.

Estimated Annual Respondent Burden Hours:

Program/Activity	Engine Families /Year	Respondents / Year	Total Responses/ year	Total annual hours per Response (Average)
Highway Motorcycles	282	55	929	15,420

6(b) Estimating Respondent Costs

(i) Estimating labor costs

The labor costs in this ICR reflect the May 2018 BLS National Industry-Specific Occupational Employment and Wage Estimates (https://www.bls.gov/oes/current/naics3_336000.htm). With a 130 percent overhead multiplier, also based on the BLS benefits adjustment factor of 30 percent for 2018, the categories are \$86.55 manager, \$37.95 technical, and \$29.15 administrative.

We have estimated labor costs for these three categories for each labor item for certification and compliance obligations. The total labor hours for all certified engine families is estimated to be 15,420, with the average annual labor burden to be 321 hours per response (engine family). This amounts to a total annual labor cost of \$461.275. This would also average to \$1,635.73 of labor cost per annual response.

(ii) Estimating Operations and Maintenance Costs

Program/Activity	Number of Respondents	Burden/ Response (\$)	Total (\$)
Highway Motorcycles	55	\$6,935.00	\$182,560

Operations and Maintenance (O&M) costs are very largely those associated with running tests; there are also small cost elements associated with other reporting and recordkeeping activities. O&M costs in this ICR are therefore highly dependent on the fluctuations in the size of the industries and do not reflect new program changes.

O&M test costs here reflect a decrease in the number of new HMC engine families being certified that require new testing to demonstrate compliance with the standard. Many highway motorcycle manufacturers also contract with testing facilities to provide data to the EPA for certification and compliance testing. Our estimates for O&M from recordkeeping requirements is derived from our informal conversations with industry and reflect growing storage of information in electronic media, i.e. databases.

(iii) Estimating Capital Costs

Annualized Capital and Startup Costs:	Number Respondents/ Year	Burden/ Response (\$)	Total (\$)
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Program/Activity			
Highway Motorcycles	55	\$12,208.00	\$97,664.00

To perform the required testing, a combination of “environmental” (exhaust and evaporative emissions) test cells are required. A significant change in this ICR is made for evaporative emissions testing, which was not fully anticipated in the previous ICR estimates. Our estimates now reflect two changes in information; 1) data of the evaporative program since the 2008 calendar year, and 2) estimates of evaporative testing from commercial test facilities.

These capital costs have long been treated as ongoing costs rather than start-up costs in the former ICR, OMB Control No. 2060-0104 series. In effect, this allows a capital cost to be attributed on a per-test basis. Because of the wide variety of circumstances among manufacturers (land availability, capital assets, lending terms, labor shifts) and the continuing changes in the numbers of vehicles and engines being certified from year to year, this is the best method of counting facilities capital costs and one which allows continuity of treatment from one collection request to another. This also has the result, as with O&M costs, that collection requests can reflect changes in the information burden due to market forces in the industry that are much too complicated to model. The changes in this estimate from the last renewal reflect re-estimations and changes in the industry, not program changes by the EPA and we will not depart from past practice in this on-highway motorcycle ICR.

The annualized depreciated costs of these facilities using the standard assumptions of seven percent interest yearly over 10 years is \$5,333.00. This is regarded as a permanent capital cost item; that is, we regard the capital stock as being continuously depreciated and replaced.

6(c) Estimating Agency Burden

The Compliance Division’s Gasoline Engine Compliance Center administers the highway motorcycle certification and compliance programs. This group currently consists of one full-time employee in Ann Arbor, MI, and a Senior Environmental Employment (SEE) Program (for technical and administrative support) dedicated to the activities covered by this ICR. Other EPA employees from Washington, DC and Ann Arbor also provide support for these activities, such as IT personnel, agency lawyers at the Office of General Counsel and the Office of Enforcement and Compliance Activities, work assignment/contract managers, upper management, etc. Contract support is also provided for database development/maintenance as well as compliance program report processing.

The cost of the Agency burden is based on hourly wage rates that are effective as of January 2019 as obtained from the Office of Personnel Management (OPM) and adjusted by a factor of 1.6 to account for benefits and overhead. For purposes of estimating Agency labor costs, the labor rates for engineers from the Detroit, MI area were used to reflect the fact that nearly all Agency labor costs for the highway motorcycle program will be incurred at OTAQ’s Ann Arbor, MI location. These rates are available at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DET_.pdf.

This ICR estimates the hourly wage for an EPA employee at \$86.21 with an adjustment to \$137.94. Administrative support is estimated to be an hourly wage of \$35.87. Therefore, the combined wage for the Agency burden would be \$173.81. We are estimating 3,275 hours a year for the Agency to review applications, conduct certification and compliance testing, review amendments to applications and certificates, and collect and review records required to be submitted to the EPA. This amounts to a total Agency burden of \$248,328 annually to administer this program. These calculations are listed in the spreadsheet under the title, “Agency Burden.”

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

From the above discussion the following total burden and cost estimates can be calculated. Due to the diverse nature of the HMC industry, there is no typical or average respondent. Respondents can be large manufacturers with many products such as Honda Motors, or they can be small businesses with a single product line. In addition, HWC’s can also be small importers of a few specialized motorcycles per year that are manufactured abroad. The total burden and cost figures below are estimates on the basis of report data from production and end-of-year reports as well as estimates from EPA personnel.

6(e) Bottom Line Burden Hours and Cost

(i) Respondent Tally

RESPONDENTS	55
BURDEN HOURS	15,420
LABOR COST	\$461,275
OPERATING COST	\$182,560
CAPITALIZED COST	\$97,644
Total Cost	\$741,499

(ii) Agency Tally

EMPLOYEES (2):	\$173.81
Annual LABOR Hours:	3275
Agency COST	\$248,328

6(f) Reasons for change in burden

The change in burden compared to the currently approved ICR is due to improvements we have made in assessing O&M cost, refined labor hours from feedback provided by the regulated community and greater accounting for permeation testing and reporting to the EPA by highway motorcycle manufacturers. The EPA has not made any program changes since the previous ICR renewal. The effect of these changes can be summarized as follows.

Additional Compliance Costs

In addition to the Agency's improved presence in certification and compliance, this ICR also recognizes the changes that have occurred in the highway motorcycle industry. EPA's compliance actions against such entities like Motor Science and Systems Launch Associates, has increased the need for all respondents to properly report production and averaging numbers as well as provide accurate certification test reports. In addition, due to the diverse nature of the highway motorcycle industry, many manufacturers are relying on contract test laboratories to conduct certification testing instead of maintaining a certification test lab to comply with EPA test requirements. Finally, evaporative and permeation reporting is required for highway motorcycles. Manufacturers have choices in terms of complying with how they choose to meet the evaporative and permeation requirements, but all must report evaporative emissions at the time of certification, an additional burden in this information collection.

Labor hours: This renewal estimates a total of 15,420 hours annually for all respondents. This change is the result of corrections to the hours used to file applications, conduct exhaust and evaporative testing, and file an application under the EV-CIS system. This ICR also accounts for the time it likely takes respondents to comply with EPA production test orders, produce production numbers at the end of the model year, and maintain data used for certification and compliance. This increase in hours reflects the improved process of estimating respondent burden to comply with EPA requirements through certification and compliance activities.

Labor costs: As stated above, this request uses BLS labor costs with a 130 percent multiplier, which captures the BLS estimate of overhead and medical care cost not reflected in the wage estimates. In addition, the labor cost estimate reflects changes in the number of vehicle certification applications to meet exhaust and evaporative emissions requirements.

6(g) Burden Statement

The average annual burden per respondent is approximately 280 hours, per engine family. These estimates include time to review applicable regulations and guidance documents, generate and gather the necessary information, submit documents, conduct certification and compliance testing, and provide all required reporting and record keeping activities.

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 submitting 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 the 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, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2016-0027, which is available for online viewing at regulations.gov, or in person viewing at the [insert your Program Office docket name] in the EPA Docket Center (EPA/DC), EPA 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. Regulations.gov 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. Comments can also be sent to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID EPA-HQ-OAR-2016-0027 and OMB Control Number 2060-0710 in any correspondence.