

PAPERWORK REDUCTION SUPPORTING STATEMENT

ENVIRONMENTAL PROTECTION AGENCY

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

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Engine Test Cells/Standards, EPA ICR No. 2066.09, OMB Control No. 2060-0483.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Engine Test Cells/Standards (40 CFR part 63, subpart P) apply to any existing, new, or reconstructed engine test cells/stands located at major source facilities that are used for testing internal combustion engines. An engine test cell/stand is defined as any apparatus used for testing uninstalled stationary or uninstalled mobile (motive) engines. A plant site is a major source of hazardous air pollutant (HAP) emissions if it 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 and reconstructed facilities include those that commenced construction or reconstruction after May 14, 2002 (the date the NESHAP was proposed).

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. These notifications, reports, and records are essential in determining compliance with 40 CFR part 63, subpart P and must be maintained for at least 5 years from the date on which it was generated. Currently, the NESHAP also requires owners/operators to maintain records of the occurrence and duration of any startup, shutdown, or malfunction (SSM) in the operation of an affected facility, or any period during which the monitoring system is inoperative. However, the EPA is finalizing amendments to the rule that eliminate the SSM exemption; remove the SSM plan and SSM recordkeeping requirements; and require electronic submittal of performance test results.

Currently, all reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

The “Affected Public” are owners or operators of engine test cells/stands. The ‘burden’ to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR part 63, subpart P) (Amendments). The federal government’s burden 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/Standards (40 CFR part 63, subpart P) (Amendments).

There are currently 59 major sources that are subject to the NESHAP, each with one or more engine test cell/stand. Of these, 12 are new or reconstructed sources; however, only 7 are currently subject to emission limits, performance testing, recordkeeping, and reporting requirements. None of the 7 facilities are government-owned entities. There are no recordkeeping or reporting requirements applicable to the remaining major sources because they are either existing affected sources used to test engines of any type or new/reconstructed sources used solely for testing combustion turbines, rockets, and/or internal combustion engines with rated power less than 25 horsepower (19 kilowatts). It is estimated that three new sources will be constructed over the next three years: two to be subject only to the initial notification requirement and one to be subject to emission limits, performance testing, recordkeeping and reporting.

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 CAA, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of HAP. These standards are applicable to new or existing sources of HAP 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 P.

Section 112(d)(6) of the CAA requires the EPA to review the technology-based MACT standards and revise them “as necessary (taking into account developments in practices, processes, and control technologies)” no less frequently than every 8 years. In addition, section 112(f) of the CAA requires the EPA to determine whether the MACT emission limitations provide an ample margin of safety to protect public health. For MACT standards for HAP “classified as a known, probable, or possible human carcinogen” that “do not reduce lifetime excess cancer risks to the individual most exposed to emissions from a source in the category or

subcategory to less than 1-in-1 million,” the EPA must promulgate residual risk standards for the source category (or subcategory) as necessary to provide an ample margin of safety to protect public health. In doing so, the EPA may adopt standards equal to existing MACT standards if the EPA determines that the existing standards are sufficiently protective. The EPA must also adopt more stringent standards, if necessary, to prevent an adverse environmental effect, but must consider cost, energy, safety, and other relevant factors in doing so.

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 CAA. 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 parametric monitoring systems are used to ensure compliance with the 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 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 P. P. P. P. P.

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

The ICR was made available for public review during the public comment period following publication of the proposed rulemaking in the Federal Register. No comments related to the ICR were received.

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 3 years. The list of facilities subject to subpart PPTPP was developed using EPA's Enforcement and Compliance History Online (ECHO) database, the 2014 National Emissions Inventory (NEI 2014) and the facility list developed for the 2003 promulgation of subpart PPTPP. The facility list was then refined by reviewing air permit information and consulting with industry and trade organizations. The growth rate for the industry is based on our consultations with the Agency's industry experts.

Industry trade associations 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 completing the subpart PPTPP RTR and this associated ICR, we contacted several industry groups, including the National Marine Manufacturers Association, at (312) 946-6231, and The Truck and Engine Manufacturers Association, at (312) 929-1970.

Further input from stakeholders and the public is expected through public comment on this ICR.

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 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(d)(2).

These standards require the respondents to maintain all records, including reports and notifications, for at least 5 years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for 5 years allows EPA to establish the compliance history of a source, to identify 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 5 years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC and NAICS Codes

The respondents to the recordkeeping and reporting requirements are owners and operators of engine test cells/stands. The United States Standard Industrial Classification (SIC) codes and their corresponding North American Industry Classification System (NAICS) codes are listed the table below.

Standard (40 CFR Part 63, Subpart P P P P P)	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

Standard (40 CFR Part 63, Subpart PPPPP)	SIC Codes	NAICS Codes
Automobile Manufacturing	3711	336111
Heavy Duty Truck Manufacturing	3711	336120
Light Truck and Utility Vehicle Manufacturing	3711	336112
Military Armored Vehicle, Tank, and Tank Component Manufacturing	3711	336992
Gasoline Engine and Engine Parts Manufacturing	3714	336312
Motor Vehicle Transmission and Power 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

Standard (40 CFR Part 63, Subpart PPPPP)	SIC Codes	NAICS Codes
Other Automotive Mechanical and Electrical Repair and Maintenance	7539	811118
Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance	7699	811310
Home and Garden Equipment Repair and Maintenance	7699	811411
Space Research and Technology	9661	927110
National Security	9711	928110

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart PPPPP). A source must make the following reports:

Notifications	
<i>Engine Test Cells/Standards Testing Internal Combustion Engines with a Rated Power of Less Than 25 hp</i>	
Initial notification	63.9290(c), 63.9345(b)
<i>Engine Test Cells/Standards Testing Internal Combustion Engines with a Rated Power of 25 hp or More</i>	
Initial notification	63.9345, 63.9(b)
Notification of construction/reconstruction	63.9345, 63.5, 63.9(b)(5)(i)
Notification of actual startup date	63.9345, 63.9(b)(5)(ii)
Notification of performance test	63.7(b)(1), 63.7(c), 63.9(e), 63.9345(d)
Notification of CMS performance evaluation	63.8(e), 63.9(g)(1), 63.9345(a)
Notification of compliance status	63.9(h), 63.7, 63.8(e), 63.10(d)(2), 63.10(e)(2), 63.9345(a), 63.9345(c)

Reports	
<i>Engine Test Cells/Stands Testing Internal Combustion Engines with a Rated Power of 25 hp or More</i>	
Excess emissions and parameter exceedance reports	63.10(e)(3)
Semiannual compliance reports	63.9350

A source must keep the following records:

Recordkeeping	
<i>Engine Test Cells/Stands Testing Internal Combustion Engines with a Rated Power of 25 hp or More</i>	
Maintain records of monitoring data	63.7(g), 63.9355
Maintain records for 5 years	63.10(b), 63.9360(b)

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. As part of the RTR amendments, respondents would be required to use the EPA's Electronic Reporting Tool (ERT) to submit performance test reports for test methods supported by the ERT. The ERT can be accessed via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>).

(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 flow rate, 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.
Develop, acquire, install and use technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and

Respondent Activities
maintaining information.
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 collect 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 ECHO and Integrated Compliance Information System (ICIS) databases.

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 standards and note the operating conditions under which compliance was achieved. 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 5 years.

5(c) Small Entity Flexibility

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

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR part 63, subpart P) (Amendments).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of “Burden” under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may 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 1,000 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously-approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

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.

(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 regulation. The annual operation and maintenance (O&M) costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

(iii) Capital/Startup vs. O&M Costs

Capital/Startup vs. 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)
Thermocouples	\$500	1	\$500	\$300	8	\$2,400

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 O&M costs for this ICR are \$2,400. This is the total of column G.

The average annual cost for capital/startup and O&M costs to industry over the next three years of the ICR is estimated to be \$2,900. These are the recordkeeping 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 \$3,770.

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, 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/Standards (40 CFR Part 63, Subpart P) (Amendments).

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 12 existing major sources will be subject to these standards, of which 7 are subject to emission limits, monitoring, recordkeeping, and reporting requirements. It is also estimated that one additional respondent will become subject to the emission standards over the three-year period and two additional respondents will be subject only to the notification requirements.

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 Facilities	(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	7	0	0	8
2	0	8	0	0	8
3	0	8	0	0	8
Average	0.3	7.7	0	0	8

¹ New respondents include sources with constructed, reconstructed and modified affected facilities. One new source is expected to be subject to the emission limit, performance testing, monitoring, recordkeeping, and reporting requirements. Two additional sources are expected to become subject to the rule over the three-year period but are expected to be subject only to the initial notification requirements and therefore, are not included in this table.

As shown above, the average number of respondents over the three-year period of this ICR is 8.

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	8	2	0	16
Initial notifications	1	1	0	1
Notification of construction/ reconstruction	0.3	1	0	0.3
Notification of actual	0.3	1	0	0.3

Total Annual Responses				
startup				
Performance evaluation report	0.3	1	0	0.3
			Total	18

The number of Total Annual Responses is 18.

The total annual labor costs are \$110,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost for Respondents– NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P P P P P) (Amendments).

6(e) Bottom-Line Burden Hours and Cost Tables

The detailed bottom-line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor burden is 1,000 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost for Respondents – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P P P P P) (Amendments). The estimate assumes 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 56 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$2,900. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over the next three years is estimated to be 80 labor hours at a cost of \$3,770; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P P P P P) (Amendments).

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

This ICR is prepared for amendments to the NESHAP for Engine Test Cells/Standards (40 CFR part 63, subpart P) (40 CFR part 63, subpart P). These amendments: (1) revise provisions in the NESHAP (40 CFR Part 63, Subpart P) to remove the SSM exemption and SSM plan; and (2) require electronic submittal of performance test results.

The number of sources subject to the standards decreased based on a review of facilities included in EPA's ECHO database, review of available operating permits, and consultation with industry representatives and state/local agencies.

Costs per labor hour were updated to reflect current labor rates based on data available from the United States Department of Labor, Bureau of Labor Statistics, survey titled "*May 2017 National Occupational Employment and Wage Estimates United States.*"¹ Labor rates for federal employees were updated to reflect the Office of Personnel Management, 2017 General Schedule.

The burden estimate for submitting performance test reports was not adjusted to account for the new requirement that reports be submitted electronically through CEDRI using the ERT. We consider the burden estimate in the current ICR for submittal of performance test results is an appropriate estimate for electronic submittal of these reports.

The removal of the SSM requirements is expected to reduce the reporting burden because sources are no longer be required to prepare SSM plans (required under (40 CFR 63.6(e)(3)) and maintain separate records of SSM events.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 56 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.

An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the final collection of information, view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through

1 See https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/GS_h.pdf.

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 OAR-2018-0753 and OMB Control Number 2060-0483 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

Table 1: Annual Respondent Burden and Cost for Respondents – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Amendments)

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	8	32	1.6	3.2	\$4,029.71
B. Notifications ^c								
Initial notifications	2	1	2	1	2	0.1	0.2	\$251.86
Notification of construction/ reconstruction	2	1	2	0.3	0.6	0.03	0.06	\$75.56
Notification of actual startup	2	1	2	0.3	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	N/A							
Compliance status report ^e	4	2	8	8	64	3.2	6.4	\$8,059.42
Performance evaluation report	16	1	16	0.3	4.8	0.2	0.5	\$599.58

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 Reporting Requirements					120		\$13,092	
4. Recordkeeping requirements								
A. Initial performance evaluation ^f	330	1	330	0.3	99	5.0	9.9	\$12,474.39
B. Monitoring demonstration ^g	148	1	148	0.3	44.4	2.2	4.4	\$5,586.05
C. Repeat performance evaluation ^h	330	1	330	0	0	0	0	\$0
D. Maintain records of CEMS performance ⁱ	1.5	52	78	8	624	31.2	62.4	\$78,579.38
Subtotal for Recordkeeping Requirements					883		\$96,640	
TOTAL LABOR BURDEN AND COST (rounded)^j					1,000		\$110,000	
Total CAPITAL and O&M COST (rounded)^j								\$2,900
GRAND TOTAL (rounded)^j								\$113,000

Assumptions:

^a We have assumed that the average number of respondents subject to the rule will be 8, and that one new facility will become subject to the emission limit, performance tests, monitoring, recordkeeping and reporting requirements of 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 \$54.81 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 source subject to the initial notification requirements in each of the next three years and that one new source will be also subject to the notification of construction/reconstruction and notification of startup over the next three years.

^d The one-time SSM plan is no longer be required.

^e Compliance status reports are required semiannually. We have assumed that deviations get reported as part of the semiannual compliance status report.

^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 subject to the e, 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 2: Average Annual EPA Burden and Cost - NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Amendments)

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 initial 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	1.6	25.6	1.3	2.6	\$1,382.74
4. Reporting requirements								
a. Review waivers ^d	2	2	4	0	0	0	0	\$0
b. Review reports								
Review initial notifications	2	1	2	1	2	0.1	0.2	\$107.84
Compliance status report ^e	2	2	4	8	32	1.6	3.2	\$1,725.50
Performance evaluation report	2	1	2	0.3	0.6	0.03	0.06	\$32.35
Subtotals Labor Burden and Cost					69.8	3.51	7.02	\$3,766.09
TOTAL ANNUAL BURDEN AND COST (rounded)^f						80		\$3,770

Assumptions:

^a We have assumed that the average number of existing sources subject to the rule will be 7, 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.