

## Supporting Statement for

### EPA Information Collection Request Number 2265.04

“SmartWay Transport Partnership” OMB Control Number  
2060-0663.

#### Short Characterization/Abstract

The U.S. Environmental Protection Agency (“EPA”) created the SmartWay Transport Partnership (“SmartWay”) to help businesses and individuals protect the environment, improve air quality, and maximize the energy efficiency of their transportation and logistics management choices. SmartWay is a voluntary program that focuses on increasing efficiency and lowering emissions generated by goods movement. EPA encourages businesses that transport and move goods to adopt energy-efficient strategies and technologies that reduce fuel use, air pollution, and energy costs.

EPA administers a streamlined reporting process for organizations that join SmartWay and has created incentives for improvement such as the SmartWay Excellence Awards Program. EPA also makes reporting tools and other resources available on the Internet to help SmartWay partners evaluate and track their environmental performance and the value of investing in transportation management year-over-year improvements.

This ICR examines the information collected under SmartWay from organizations active in the transportation sector. Sections 1 through 5 of this supporting statement describe the collections (in terms of the need and utility of the data collected). These sections also outline respondent and Agency activities. In Section 6, EPA estimates the annual hour and cost burden to respondents and the Agency as a result of the data collections.

#### SMARTWAY TRANSPORT PARTNERSHIP AND THE TRANSPORTATION SECTOR

SmartWay consists of the following participant groups:

- **Carrier partners** are businesses that provide freight transport services, and that own and/or operate vehicles used in goods movement and related transportation-based assets. These businesses include freight carriers (large trucking, small business truck owners, railroad, inland marine and air carriers), commercial manufacturing and retail companies, logistics service providers and similar organizations. SmartWay partners commit to improve

their fuel efficiency and environmental performance when they join the partnership.

- **Shipper and Logistics partners** consist of manufacturers, retailers, logistics companies, and freight forwarders that hire or contract with transportation providers (e.g., carriers) to move goods. SmartWay shipper and logistics companies agree to annually assess the proportion of goods dispatched with SmartWay carriers. They report their freight transportation activity using a reporting tool similar to that used by carriers and EPA calculates their supply chain efficiency. Shippers and logistics companies agree to ship an increasing percentage of their goods with SmartWay carriers, and to lower emissions from their facility transportation operations when they join SmartWay.
- **Affiliates** are both private and non-profit organizations and companies, including trade associations, state and local governments, leasing companies, retail truck equipment dealers, and other groups that encourage the transportation sector to integrate cleaner, more efficient strategies into their business operations.

This ICR covers the following reporting activities associated with partner participation in the SmartWay program:

#### *SmartWay Partnership Annual Agreement*

An organization joins SmartWay when its submitted reporting tool is reviewed and approved. This reporting tool has an embedded SmartWay Partnership Annual Agreement (“Annual Agreement”) that states the general terms under which the partner agrees to participate. It also includes what EPA commits to do in return for the organization’s participation.

For example, partners commit to measure and report to EPA on an annual basis the environmental performance of their fleet(s) or business units using the EPA’s reporting tool; have their performance results posted on the EPA SmartWay website and in the database and submit supporting documentation for any data used to complete their tools upon request by EPA.

In return, EPA agrees to do the following:

- o Promote company participation in the partnership by posting partner names on the EPA SmartWay Website and in related educational, promotional, and media materials. EPA will obtain express written consent from the partner before using the partner’s name other than in the context of increasing public awareness of its participation as described here.
- o Provide companies with industry-wide performance benchmark data as this data becomes available to EPA.
- o Assist partners in achieving emission and fuel usage reduction goals (subject to Federal Government Appropriations).
- o Treat individual corporate data as sensitive business information.

Partners must check a box at the bottom of the Annual Agreement indicating that they understand and agree to program participation terms before they can move into the reporting tool to enter their data.

### *SmartWay Annual Reporting Tool*

Upon joining SmartWay, carriers, shippers, and logistics management companies agree to annually measure efficiency and emissions generated by their freight transportation-related activities. To do so, partners collect data on their freight management business, such as transportation mode, fleet size, equipment type, fuel use, number of miles traveled, payload and related factors. They then input this information into the reporting tool and submit it electronically to the EPA. EPA reviews, approves, and uploads the completed reporting tool into its Customer Relationship Management (CRM) partner account database (“Partner database”).

EPA’s partner reporting tools use the keyed-in freight data to calculate efficiency and emission outputs--carbon dioxide (CO<sub>2</sub>), oxides of nitrogen (NO<sub>x</sub>), and particulate matter (PM). The-outputs in the reporting tool enable partners to conduct analyses that help them optimize the efficiencies of their transportation management activities. These outputs are in reports, embedded in the tool and can be used to benchmark and continuously improve partner sustainability performance year-over-year.

After initially submitting data in the reporting tool when they first join, partners are asked to annually update their transportation management activities using the reporting tool. These annual updates help partners to track fuel economy improvements and monitor the effectiveness of their actions to improve their freight efficiency and reduce emissions year after year. EPA uses these annual updates to monitor the progress of the SmartWay program.

### *SmartWay Affiliate Agreement*

SmartWay affiliates are organizations that encourage their members or customers to participate in SmartWay. Affiliates also commit to highlight SmartWay within the freight transportation industry. To become an affiliate, the organization must complete and submit an affiliate agreement to the EPA.

In return, EPA agrees to do the following:

- Educate SmartWay partners about the affiliates’ involvement;
- Publicize affiliates’ participation through SmartWay events, the website, and listing in educational materials. EPA will obtain written consent from an Affiliate before publishing its name in a context beyond increasing public awareness of its participation as described above;
- Provide resources to affiliates to assist them in highlighting SmartWay;
- Allow affiliates to use the SmartWay Transport name in their activities related to promoting the SmartWay Transport Program provided the name is never used to imply EPA endorsement of affiliates, their products or services;
- Provide EPA representatives as requested and as available to speak about

- SmartWay at affiliate meetings, workshops and conferences;
- o Provide technical assistance as needed to help affiliates achieve program goals.

### *SmartWay Excellence Awards*

Partners may be considered for a SmartWay Excellence Award and gain public recognition for their environmental performance. Efficiency and emissions data may be used by partners to demonstrate their progress in reducing fuel use and air emissions. As part of the award process, a subset of partners (shippers, logistics providers and multimodal carriers) may also provide greater detail on specific actions/strategies they have taken to increase the efficiency of their transportation-related business activities while reducing environmental impacts.

### *Program Evaluation*

Through workshops, webinars, conferences, and other interactive venues, SmartWay provides opportunities for partners, other industry representatives, and consumers to provide input on their experience with SmartWay.

### *SmartWay Tractor and Trailer Program*

EPA-designated SmartWay tractors and trailers are a newer generation of long-haul rigs equipped with clean, fuel-saving features that meet voluntary equipment specifications. EPA-designated SmartWay tractors and new and retrofitted trailers can achieve fuel savings of 10 to 20 percent and lower emissions, as compared to non-SmartWay-designated trucks. SmartWay-designated tractor and trailer owners need not be registered SmartWay partners.

For-hire carriers, owner-operators, manufacturers and retailers with private fleets that own, lease and/or operate EPA-designated SmartWay tractors or trailers are eligible to label the exterior of their EPA-designated SmartWay tractors or trailers with the SmartWay logo. Both SmartWay partners and other private or for-hire fleets may submit an application to EPA to obtain the digital files of the EPA-designated SmartWay logo for eligible tractors and trailers.

Original Equipment Manufacturers (OEMs) that produce tractors and trailers that meet the EPA-designated SmartWay specifications may complete and submit a SmartWay license agreement in order to access and use the SmartWay designated logo for promotional purposes.

EPA may re-evaluate designation requirements over time to reflect changes in the fleet mix.

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the**

## **collection of information.**

The EPA's Office of Transportation and Air Quality (OTAQ) established SmartWay under directives outlined in Subtitle D of the Energy Policy Act of 2005<sup>1</sup> which calls on EPA to assess the energy and air quality impacts of activities within the freight industry. These activities include long-duration truck idling, the development and promotion of strategies to reduce idling, fuel consumption, and associated negative air quality effects. SmartWay's objectives also are consistent with the Clean Air Act, the Federal Technology Transfer Act, and other laws that authorize and support research, training, and air pollutant control activities.

SmartWay is a key program in the Agency's strategic approach to achieving cleaner, leaner goods movement supply chains. SmartWay supports and complements the Agency's commerce and environmental policy goals. SmartWay also supports OTAQ's mission to protect the environment from freight transportation-based activities through the advancement of air pollution control equipment and technologies, clean fuels, and innovative mobility and logistics management strategies.

Information collected through SmartWay assists OTAQ in evaluating the challenges the freight industry is managing as the industry seeks to conserve fuel, reduce idling activity, lower emissions, and improve its overall economic and environmental performance (through the application of technology-based controls, efficient logistics management strategies and related approaches). SmartWay also provides opportunities for EPA and industry to cooperate and collectively execute strategies that can help improve the transportation industry's financial and environmental performance, both in the short term and the long term.

Data gathered through SmartWay contribute to OTAQ's goals to improve transportation efficiencies, reduce transportation-based emissions and protect human health and the environment. SmartWay program data also is critical to monitoring and measuring the success of SmartWay as a public/private partnership, both in terms of collaboration and as a tool for improving supply chain efficiency and contributing to cleaner air.

## **2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

Information collected through the SmartWay program has a broad range of practical and useful applications. The annual reporting tool is needed to secure basic contact information and to ensure an organization's commitment to SmartWay's energy and environmental goals. Data submitted through the reporting tool assist partners in quantitatively assessing the fuel consumed and air pollutant emissions generated by their transportation and freight activities. Outputs from the reporting tools' data reports help organizations establish benchmarks, identify strategies, and set future goals for conserving fuel and reducing emissions.

By allowing carriers to compare their efficiency and environmental performance in the online Carrier Performance Ranking spreadsheet with competing carriers,

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<sup>1</sup> Energy Policy Act of 2005, Public Law 109-58-756(b) at <https://www.govinfo.gov/content/pkg/COMPS-10914/uslm/COMPS-10914.xml>

SmartWay drives continued improvements across industry. Superior performance in various partner categories is also recognized through the SmartWay Excellence Awards.

Completing and submitting an updated annual reporting tool helps partners monitor their progress, determine if their goals are being met, and adjust their goals if necessary. These updates also can provide partners with valuable information on the environmental and economic benefits of applying the options available for modifying their freight transport methods (e.g. purchase idle reduction equipment, modify pickup and delivery schedules, adopt intermodal options, etc.).

OTAQ uses outputs from the SmartWay reporting tools and its partner database to evaluate progress toward its goals for reducing transportation-based emissions. Information uploaded from the SmartWay reporting tools into the partner database also is used to select potential candidates for a SmartWay Excellence Award. The data are considered by EPA as part of its Excellence Awards program in conjunction with other information that a subset of partners (shippers, logistics providers and multimodal carriers) may also provide additional qualitative information to demonstrate the freight industry leadership progress they are making to meet the environmental commitments they made when joining SmartWay.

EPA also uses data from the tools to improve the SmartWay tools over time, making them more user-friendly and responsive to needs and changes in the industry; to generate aggregate partner information charts and graphics used in EPA's "Trends, Indicators and Partner Statistics" website, a resource for industry, government and academia; to generate the performance ranges EPA uses in ranking carrier partners; and, to calculate program forecasts and trend lines, for estimating future year benefits.

### ***SmartWay Affiliate Agreement***

The affiliate agreement is used to help EPA encourage those supporters who do not qualify as SmartWay partners (e.g., non-profit organizations, associations, tractor/trailer dealerships) to advocate SmartWay's goals for better freight transportation with their membership. This affiliate agreement is a one-time submittal. Once the association has submitted the affiliate agreement, and EPA approves them into the program as an affiliate, the affiliate does not need to submit another affiliate agreement.

### ***Annual SmartWay Excellence Awards***

The SmartWay Excellence awards program provides EPA an important opportunity to publicly recognize the collective efforts of industry and individual organizations to conserve energy, improve air quality and raise awareness about the program. This recognition serves as a meaningful incentive, encouraging continuous improvement among existing partners and affiliates, highlighting their success within industry among peers, raising the bar on sustainability and helping to strengthen and build the partnership.

### ***Program Evaluation***

Periodic feedback and evaluation on the effectiveness of the SmartWay program and recognition of SmartWay as a brand from program partners, and other representatives active in

the transportation sector will enable EPA to make program changes as may be warranted. This feedback and evaluation also enables EPA to ensure the value, usefulness, and effectiveness of the program.

### *SmartWay Tractor and Trailer Program*

Companies that own or lease tractors or trailers designated under the SmartWay Verification Program report the number of EPA-designated SmartWay tractors and/or trailers in their fleets to SmartWay as they apply to obtain the SmartWay tractor and/or trailer logos. SmartWay uses this information to evaluate progress toward its energy efficiency and air quality goals.

Original Equipment Manufacturers that produce tractors and trailers that meet the EPA SmartWay designated specifications may complete and submit a SmartWay license agreement in order to access and use the SmartWay designated logo for promotional purposes. One way EPA protects the SmartWay brand is via authorization of the license agreements for manufacturers.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

SmartWay introduced an online Truck Carrier Partner Tool for fleets with 20 trucks or fewer. We anticipated that moving from a macro-enabled Excel workbook format for the tool to an online fillable form would have several benefits: it would greatly increase data security; it would enable partners with platforms other than Windows, such as Apple, to fill out the tool; and it would free SmartWay developers from having to keep up with the latest software releases and ensuring backward compatibility. We hoped that it would also reduce the amount of time required for partners to complete the tool and for PAMs to review it. The experience with the tool for small truck fleets confirmed that, and now SmartWay is moving forward with plans to convert all partner tools to the online fillable format.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The information collected under this ICR is not collected by any other EPA office or any other federal agency. Therefore, no potential for duplication with other federal collections exists.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

EPA expects that some independent truck owners, small fleet (20 and under trucks) operators and other small businesses will participate in SmartWay. EPA has designed its information collections to minimize respondent burden while obtaining sufficient and accurate freight transportation information. EPA has tailored its reporting tools to ensure that the burden on all businesses – including small businesses – is minimal. For truck carrier partners with 20 trucks or fewer filling out an annual update, EPA has introduced an On-Line Truck Tool, which takes less time to fill out.

Small entities, along with any respondent, can call the SmartWay Helpline, attend and/or download recorded SmartWay webinars, download instruction guides or use the SmartWay email box to access help and program information. Additionally, SmartWay works with affiliates such as state trucking associations to provide additional education and training.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

*SmartWay Partnership Annual Agreement and Reporting Tool*

The annual agreement is part of the reporting tool. Less frequent data collection would reduce the value of the data in informing freight transportation industry decisions, decrease program effectiveness and hamper EPA's ability to track emission benefits.

A company submits the annual reporting tool upon joining SmartWay and annually thereafter, for as long as an organization remains a SmartWay partner. First-year system outputs are used by partners as a baseline to establish energy and emission reduction goals in the future.

Submitting annual reporting tool updates are necessary for SmartWay partners to determine the effectiveness of their actions to reduce emissions and energy use year-over-year. Likewise, for EPA, collecting and storing the reporting tool data annually ensures that the Agency is able to establish quantitative information on the Program's progress in reaching SmartWay's goals.

Submitting a reporting tool to EPA less frequently than annually would prevent EPA and its SmartWay partners from tracking and assessing the progress of partners and the program as a whole. It also would make it difficult for partners to modify their strategies to reduce energy use and emissions, as needed, to meet their goals. Annual reporting tool updates are necessary for EPA and its SmartWay partners to effectively work toward their shared energy and environmental goals. It would also require significant changes to the program's reporting tools and structure.

The updated data also are important to EPA when assessing partner performance as part of the SmartWay Excellence Awards program. The Excellence Awards are an important improvement incentive and encourages partners to implement effective strategies that help conserve energy, reduce emissions, and improve air quality. This recognition is given on an annual basis.

### *SmartWay Affiliate Agreement*

The affiliate agreement is used to help EPA allow SmartWay supporters who do not qualify as SmartWay partners (e.g., non-profit organizations, associations and tractor/trailer dealerships) to act as an advocate for SmartWay to their membership. This is a one-time submittal. Once the organization has submitted the affiliate agreement, and EPA approves them into the program as an affiliate, the affiliate will not have to complete another affiliate agreement. Submitting the one-time affiliate agreement is necessary for EPA and its affiliates to effectively work toward their shared energy and environmental goals.

### *Program Evaluation*

Providing sufficient opportunities for SmartWay partners and transportation industry professionals to provide input to EPA on the effectiveness of SmartWay is necessary to monitor and implement program changes, as needed, in a timely manner.

### *SmartWay Tractor and Trailer Program*

Companies in good standing that purchase or lease EPA-designated SmartWay tractors and/or trailers can submit an application to apply the SmartWay logo to the exterior of their EPA-designated SmartWay equipment. Submitting the application is necessary for EPA to protect the SmartWay brand and respondents to effectively work toward their shared energy and environmental goals.

## **7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

Information collections performed under this clearance will comply with general guidelines outlined in 40 CFR 1320.5(d)(2).

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The announcement of a public comment period for this renewal ICR was made in the Federal Register on July 27, 2020 under Docket ID Number **EPA-HQ-OAR-2007-0482**. One comment was received, stating support for the SmartWay program, and offering no comment on the burden estimates.

EPA did not conduct consultations per 5 CFR 1320.8(d)(1).

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No such payments or gifts are provided.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

Participation in SmartWay is voluntary and may be terminated by participants or EPA at any time. Partners voluntarily provide company-specific data to EPA. Such data may contain trade-secret, commercial or financial information. Accordingly, EPA manages SmartWay

partner company-specific data and information in accordance with EPA’s provisions on confidentiality. 40 CFR Part 2, Subpart B establishes EPA’s general policy on the public disclosure of information and procedures for handling confidential business information (CBI) claims.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No questions of a sensitive nature are asked of SmartWay participants (“respondent(s)”).

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.**

Table 4.1 lists selected North American Industrial Classification System (NAICS) codes and the primary industry sectors associated with those codes. These industry sectors may be affected by SmartWay-related information collections covered under this ICR.

**Table 4.1  
List of NAICS Codes for SmartWay Partners**

<b>NAICS Code</b>	<b>Industry</b>
421	Wholesale Trade, Durable Goods
422	Wholesale Trade, Nondurable Goods
4211	Motor Vehicle and Motor Vehicle Part and Supplies
42111	Automobile and Other Motor Vehicle Wholesalers
42112	Motor Vehicle Supplies and New Part Wholesalers
423	Wholesale Trade, Nondurable Goods
44-45	Retail Trade

48-49	Transportation and Warehousing
481	Air Transportation
4811	Scheduled Air Transportation
481112	Scheduled Freight Air Transportation
4812	Nonscheduled Air Transportation
48121	Nonscheduled Air Transportation
481212	Nonscheduled Chartered Freight Air Transportation
481219	Other Nonscheduled Air Transportation
482	Rail Transportation
4821	Rail Transportation
48211	Rail Transportation
482111	Line-Haul Railroads
482112	Short-Line Railroads
483	Water Transportation
4831	Deep Sea, Coastal and Great Lakes Water Transportation
48311	Deep Sea, Coastal and Great Lakes Water Transportation
483111	Deep Sea Freight Transportation
483113	Coastal and Great Lakes Freight Transportation
4832	Inland Water Transportation
48321	Inland Water Transportation
483211	Inland Water Freight Transportation
484	Truck Transportation
4841	General Freight Trucking
48411	General Freight Trucking, Local
48412	General Freight Trucking, Long-Distance
484121	General Freight Trucking, Long-Distance, Truckload
484122	General Freight Trucking, Long-Distance, LTL
4842	Specialized Freight Trucking
488	Support Activities for Transportation
4881	Support Activities for Air Transportation
48811	Airport Operations
488119	Other Airport Operations
48819	Other Support Activities for Air Transportation
4882	Support Activities for Rail Transportation
48821	Support Activities for Rail Transportation
4883	Support Activities for Water Transportation
48831	Port and Harbor Operations
48832	Marine Cargo Handling
48833	Navigational Services to Shipping
48839	Other Support Activities for Water Transportation
4884	Support Activities for Road Transportation
4885	Freight Transportation Arrangement
48851	Freight Transportation Arrangement
4889	Other Support Activities for Transportation
48899	Other Support Activities for Transportation
488991	Packing and Crating
488999	All Other Support Activities for Transportation
4931	Warehousing and Storage Facilities
49311	General Warehousing and Storage Facilities
49312	Refrigerated Warehousing and Storage Facilities
49319	Other Warehousing and Storage Facilities

*SmartWay Annual Reporting Tool*

A respondent company completes a reporting tool for its transportation mode

(e.g., carrier, multi-modal, shipper) when it joins SmartWay. The partnership annual agreement is embedded in the reporting tool. Respondents need to thoroughly review, comprehend and agree to the terms in the agreement.

The partnership annual agreement includes the following information:

- The importance of an accurate and true reporting tool submission,
- Terms of the company's commitment,
- Terms of EPA's commitment,
- General terms of the SmartWay partnership, and
- A statement confirming an understanding of the annual agreement.

The SmartWay annual reporting tool is a Microsoft Excel-based spreadsheet that enables SmartWay partners to quantify the environmental performance of their freight transportation-based operations in reports generated by the tool. SmartWay partners download the reporting tool from the SmartWay website ([www.epa.gov/smartway](http://www.epa.gov/smartway)) and enter their freight transportation data when they join SmartWay. They submit updated reporting tools annually thereafter. Truck Carrier partner with 20 trucks or fewer can fill out a simpler On-Line Truck Tool. EPA estimates that 500 partners fall into this category. SmartWay provides tailored carrier and shipper reporting tools for different modes of moving goods. Available reporting tools include truck, rail, inland marine (barge), air, multi-modal, and logistics.

For carrier partners the reporting tool requires the following information:

- Contact information, including a responsible primary contact for the company, an alternate contact, an executive contact; street and electronic addresses and phone numbers, and
- Information about the company, including data about its existing transportation equipment, such as the number of trucks employed; gallons of fuel used and miles traveled annually; average payload; clean air equipment deployed and idling activity.

For shipper and logistics partners, the reporting tool requires the following information:

- Contact information, including a responsible primary contact for the company, an alternate contact, an executive contact; street and electronic addresses, and phone numbers, and
- Information about the company's transportation activities, including carriers hired to transport goods; mode/s used to transport goods; and freight facility operations.

### *Annual SmartWay Excellence Awards*

The Annual SmartWay Excellence Awards recognize outstanding achievements by partners in the program. Data from the reporting tools uploaded and summarized in the partner database provide the basis for an award. A subset of partners (shippers, logistics providers and multimodal carriers) also have the option of providing additional qualitative information, as listed below, to be considered for an award.

Additional information that may be provided by a Partner includes:

- Efforts undertaken to educate its staff, customers, stakeholders and the public about its participation in SmartWay, and
- Other activities supporting its participation as a SmartWay partner (e.g., a shipper may offer special assistance or incentives that help and/or encourage carriers to join SmartWay).

Information that may be provided by an affiliate highlights their success within industry peer organizations, raising the bar on sustainability and helping to strengthen and build the partnership.

### *SmartWay Affiliate Agreement*

An organization that wishes to support SmartWay as an affiliate completes the SmartWay affiliate agreement when it joins SmartWay. The affiliate agreement is in Adobe Acrobat format and is submitted electronically, or by fax.

A completed affiliate agreement lists the commitments that both EPA and the joining organization assume by working together through the SmartWay partnership. On average, EPA estimates that 0.82 hours are needed to thoroughly review, comprehend and submit the affiliate agreement. This could include some legal review.

### *Partner Evaluation*

SmartWay may request feedback on the program and the tools it provides, which would be expected to require no more than .25 hours of a respondent's time.

### *SmartWay Tractor and Trailer Program*

Any company, individual, or SmartWay partner that wants to label the exterior of its tractors and/or trailers as "EPA-designated SmartWay Tractor" or "EPA-designated SmartWay trailer" will complete and submit the SmartWay Equipment Checklist that may be downloaded from the EPA's SmartWay website. Completion and submission of the Equipment Checklist signifies that a company owns or operates the respective tractor and/or trailer that meet the EPA-designated SmartWay specifications.

*Note: The EPA-designated SmartWay tractor and trailer logos are separate from and different than the SmartWay partner logo and can be applied for by any buyer of EPA-designated SmartWay equipment.*

Data that the partner or EPA-designated equipment buyer submits in the SmartWay Equipment Checklist include:

- Name of the truck and/or trailer manufacturer,
- Name of the truck and/or trailer model/brand,
- The model year of the truck and/or trailer,
- Identification of SmartWay-verified technologies on the trucks (e.g., tires, idling control devices) and trailers (e.g., tires, aerodynamic equipment), and
- The number of EPA-designated SmartWay trucks and/or trailers in use

by the company fleet owner/operator/lessor.

The company fleet owner/operator/lessor also completes and submits the Mark (i.e., logo) Signature Form. This form is found on page 54 of the SmartWay Graphic Standards & Usage Guide.) Signing and submitting this form to EPA signifies understanding of the agreement to adhere to the SmartWay logo guidelines.

EPA estimates that it takes partners and company fleet owners/operators/lessors approximately 2.75 hours to compile and submit the SmartWay Equipment Checklist and Mark Signature Form.

Any manufacturer that wishes to label the interior of tractors or trailers it produces as “SmartWay Designated” will complete and submit the SmartWay License Agreement that may be downloaded from the EPA’s SmartWay website. Completion and submission of the License Agreement authorizes advertising and promotion of tractors or trailers that meet the EPA-designated SmartWay specifications by Original Equipment Manufacturers.

Exhibit 1 presents the annual respondent burden hours and the associated costs for information collection activities associated with SmartWay.

The labor rates used to estimate costs to respondents are consistent with hourly national wage rates published by the U.S. Bureau of Labor Statistics publications on employment and earnings for 2019. EPA estimates a median hourly respondent labor cost. EPA also multiplied hourly wage rates by the standard government overhead factor of 1.6 to calculate overhead costs such as paid leave, health insurance, retirement savings, office space, computers, and other business expenses. This resulted in hourly respondent labor burden of \$111.79 for legal staff, \$94.21 for managerial staff, \$72.13 for technical staff, and \$31.57 for clerical and/or administrative staff. Those rates are all higher than in the previous ICR except the rate for technical staff, which is \$3.25 lower than the rate of \$75.38 used in the previous ICR. This resulted in decreased labor costs for some respondent tasks, as shown in Exhibit 1.

EPA has estimated the average number of respondents associated with each of the information collections under the program. These averages and an explanation of how they were derived follows for each collection activity.

### *Affiliates*

Based on information drawn from the SmartWay Partner database, there are currently approximately 4,200 respondents participating in SmartWay. Of those 4,200 respondents, approximately 252 (6%) of them are affiliates.

These affiliates do not complete or submit an annual reporting tool. Affiliates join SmartWay to highlight and support SmartWay’s goals through education and communications. They typically do not engage in a significant amount of freight activity. Consequently, it is not necessary for them to complete or submit an annual SmartWay reporting tool. However, they must complete and submit an Affiliate Agreement to participate with SmartWay as an affiliate.

Based on historical program growth, EPA estimates that, on average, 429 respondent organizations will join SmartWay each year either as partners or affiliates. Based on the

existing percentage of respondents that are Affiliates (i.e., 6%), EPA projects that 26 respondents will join annually as Affiliates). EPA estimates that it will take, on average, 0.82 hours for each of these Affiliates to complete and submit an Affiliate Agreement. For the 3-year period covered by this ICR, EPA estimates the average number of affiliate respondents will be 271.

#### *SmartWay Partnership Annual Agreement and Reporting Tool*

EPA asks all organizations that join SmartWay, with the exception of affiliates, to download the reporting tool, which is available online, and to enter their freight transportation activity data into the reporting tool before submitting it to EPA. After that, partners are asked to provide annual updates using the reporting tool.

Based on historical program growth, EPA estimates that 429 organizations representing shipper, carrier (truck, rail), logistics management, and public and private affiliate groups will join SmartWay annually. Using historical trends, EPA estimates that approximately 94%, or 403, of those organizations will register annually as SmartWay partners. The other 6% – 26 organizations– will join as affiliates.

EPA estimates that these 403 new partners will enter data each year, taking 5.16 hours on average to do so. This work will entail the following:

- Reviewing the terms of the embedded annual agreement which may include legal review for some companies,
- Gathering information needed to provide relevant data into the reporting tool,
- Downloading the reporting tool from the SmartWay website and entering information and relevant data into the reporting tool,
- Reviewing the reporting tool and data outputs for inconsistencies and errors,
- Sending the completed reporting tool to the EPA via email.

#### *SmartWay Annual Reporting Tool Updates*

Following the initial submittal of data using the reporting tool, EPA asks that partners annually report their progress in meeting their partnership goals. EPA reviewed the SmartWay program's retention rate among its existing partners and found that about 75% of partners that initially submit a reporting tool go on to maintain their status by annually submitting the reporting tool and annual agreement. Thus, of the 403 new SmartWay partners that submit a reporting tool for the first time each year, approximately 302 of them will submit a reporting tool update in years that follow. Using this level of annual increase, EPA estimates that, for the 3-year period covered by this ICR, the average number of repeat annual reporters will be 4,250.

Although the same basic actions that are involved in initially submitting the reporting tool are used in subsequent reporting years, EPA estimates that gathering, reviewing, and submitting an updated reporting tool will require an average of 2.66 hours. The reduction in this burden hour estimate (as compared to running the reporting tool for the first time) is based on the experience that SmartWay partners have acquired in managing their fleet, energy and environmental performance as well as in increased familiarity with the SmartWay reporting tool. Additionally, existing truck carrier partners with fleets of 20 trucks or fewer can now submit an on-line tool, rather than the downloadable Excel-based tool. Through beta testing, partners found

this tool to be easier to fill out. EPA estimates that completing and submitting the on-line tool requires an average of 0.45 hours, and that 500 of the 4,250 partners are eligible to use it.

As a result, EPA estimates that on an average annual basis, 4,250 SmartWay partners will provide an updated reporting tool, taking 2.4 hours to do so.

#### *Annual SmartWay Excellence Awards*

As a part of its annual SmartWay Excellence Awards program, EPA annually reviews the data respondents submit to identify and recognize respondents that demonstrate a high level of leadership in improving energy efficiency while lowering emissions. Selected shipper and logistics respondents have the option of providing EPA with other relevant information on actions that may not be captured in their performance data.

When a respondent voluntarily opts to submit this information, it will:

- Gather and compile information on its activities, including samples of education and communication materials and in-house tools developed to highlight its involvement in SmartWay,
- If the supplemental information includes activities and/or projects carried out where weight and/or miles are taken out of their supply chain, respondents submit their methodology, calculations with summarized results and
- Send these materials to EPA, electronically.

Based on EPA's experience in administering the SmartWay Excellence Awards program, it is estimated that 132 partners (about 3.1% of all partners) will provide this additional information for consideration on an annual basis during the three-year time period covered by this ICR. On average, these partners will take 3.25 hours to gather and submit the award materials that they would like EPA to evaluate.

#### *Program Evaluation*

Over the three-year period covered by this ICR, EPA expects that it will ask respondents for advice and suggestions on the effectiveness of SmartWay and how to improve the tools and incentives it provides the transportation sector. EPA will request this information no more than once a year from no more than 150 respondents and expects that it will require no more than 15 minutes (.25 hrs.) of time from a respondent.

#### *SmartWay Tractor and Trailer Program*

Approximately 170 SmartWay partners reported owning or operating tractors that meet the SmartWay designated specifications. This is an annual average of 14 SmartWay partners applying to participate since the SmartWay Tractor Program began in 2008.

Approximately 54 SmartWay partners reported owning or operating dry van trailers that meet the SmartWay designated specifications. This is an annual average of 5 partners applying to participate since trailers were included in the program in 2009.

Based on historical data, EPA estimates that, on average, 19 interested partners will apply to participate in the SmartWay Tractor and Trailer Program annually over the three-

year period covered by this ICR. EPA estimates that it will take these partners approximately 2.75 hours each to gather the required data and to complete and submit the SmartWay Equipment Checklist and the Mark Signature form needed to participate in the SmartWay Tractor and Trailer program.

Based on current data, EPA estimates that, on average, 16 equipment manufacturers who will update a tractor or trailer license agreement each year. EPA estimates that it will take at least .50 hours each to complete the agreement and submit it to EPA.

<b>Table 6.1 – Respondent Counts</b>				
	Number of Partners Filing Repeat Annual Reports	Number of First Year Partners	Number of Affiliates	Total Respondents
YR 1	3948	403	252	
plus 75% of previous year's new	302		19	
YR 2	4250	403	271	
plus 75% of previous year's new	302		19	
YR 3	4553	403	291	
Average	4250	403	271	

## **Bottom Line Burden Hours and Cost Tables**

### **Respondent Tally**

As shown in Table 6.2, EPA estimates the total annual hour and cost burden to respondents to be 12,830 hours and \$861,881 with \$0 in non-labor costs.

**Table 6.2**

<b>Total Estimated Annual Respondent Burden and Cost Summary</b>							
<b>Information Collections</b>	<b>Number of Responses (Average/Year)</b>	<b>Estimated Burden Hours per Respondent</b>	<b>Total Annual Burden Hours</b>	<b>Total Annual Labor</b>	<b>Total Annual Capital Cost</b>	<b>Total Annual O&amp;M Cost</b>	<b>Total Annual Cost</b>
<b>Affiliate Agreement</b>	26	.82	21	\$1,771	\$0	\$0	\$1,771
<b>Initial Reporting Tool and Annual Agreement Submission</b>	403	5.16	2,081	\$143,074	\$0	\$0	\$143,074
<b>Annual Reporting Tool Updates</b>	4250	2.4	9,976	\$678,290	\$0	\$0	\$678,290
<b>Excellence Awards &amp; Recognition</b>	132	3.25	429	\$31,069	\$0	\$0	\$31,069
<b>Evaluation</b>	150	.25	38	\$3,533	\$0	\$0	\$3,533
<b>Tractor and Trailer Program</b>	19	2.75	52	\$3,595	\$0	\$0	\$3,595
<b>Tractor/Trailer License Agreement</b>	16	.50	8	\$550	\$0	\$0	\$550
<b>TOTAL</b>	4,770	--	12,830	\$861,881	\$0	\$0	\$861,881

**13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).**

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

In general, EPA is not expecting that respondents will need additional computers, software, or other capital investments to participate in the SmartWay Transport Partnership. Respondents should be able to use existing computer equipment and software to compile and submit the annual reporting tool and to submit all other information as part of their SmartWay participation.

Operations and maintenance (O&M) costs are those costs associated with a paperwork requirement incurred continually over the life of the ICR. They are defined by the Paperwork Reduction Act of 1995 as the “recurring dollar amount of costs associated with O&M or purchasing service.”

This ICR no longer includes O&M postage costs for each submittal to EPA for the collection of optional items such as hard copies of materials submitted with the Smartway Excellence Award Application for consideration of a SmartWay Excellence Award. EPA previously estimated an average cost of \$15.00 per submittal. Now, all submittals are electronically provided for the SmartWay Excellence Awards. These costs no longer affect the respondent burden.

**14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

EPA SmartWay managers, staff, and Partner Account Managers (PAMs) will perform certain activities associated with information collections described in this ICR. These activities serve to develop, evaluate and support the SmartWay program.

#### *SmartWay Annual Agreement*

The Agency will perform the following activities related to the partnership annual agreement:

- Promote company participation by posting partner names on the SmartWay website and in related educational, training, and media materials,
- Provide partners with their freight transportation performance ranking data as it becomes available and summarized by EPA,
- Assist partners in achieving freight performance goals,
- Update and maintain SmartWay website, and
- Monitor the distribution and use of SmartWay logos.

#### *SmartWay Annual Reporting Tool*

The Agency will perform the following activities related to SmartWay partner-submitted reporting tools:

- Assign a Partner Account Manager (PAM). A PAM is a technical expert that is responsible for reviewing and approving SmartWay partner tool submissions, offers suggestions to partners on efficiency strategies and improvements and engages non-SmartWay companies with SmartWay.
- Review, approve, and upload to the partner database new and updated partner freight transportation performance data submitted in the reporting tool,
- Send a welcome letter and registration certificate to the new partner,
- Request updates of data, strategies undertaken and substantiation of information annually,
- Review partner activities undertaken to highlight their SmartWay participation,
- Review partner's year-over-year progress in the database, and note any anomalies that would necessitate a call from the PAM to the partner,
- Update and maintain SmartWay Website Performance Carrier Ranking List.

#### *Annual SmartWay Excellence Awards*

The Agency will review SmartWay partner data and any additional information/data

partners provide to highlight their progress and achievements in leaning and greening their freight operations:

- Review and rank performance data that is submitted,
- Review and assess other partner information submitted for award consideration, and
- Summarize and evaluate partner accomplishments and achievements that warrant excellence recognition.

#### *Annual SmartWay Affiliate Challenge*

The Agency will review information affiliates provide that show how engaged they are with the SmartWay program. The information provided by affiliates will demonstrate the variety of innovative ways used to raise awareness about freight supply chain sustainability.

#### *Program Evaluation*

The Agency will review data and feedback from its partners, and industry representatives on the program and use it to adjust/change and improve the program.

#### *SmartWay Tractor and Trailer Program*

SmartWay will perform the following activities in support of the SmartWay Tractor and Trailer Program:

- Review the tractor and trailer logo requests from companies via checklist submissions,
- Answer questions of companies, individuals and partners, as appropriate, and
- Once approved, send the digital logo files to the EPA-designated SmartWay equipment buyer(s),
- Review and file the SmartWay License Agreement,
- Send the digital files of the SmartWay designated logo to the manufacturer.

The data in Exhibit 2 shows that EPA estimates that each EPA federal burden hour for the information collection activities associated with SmartWay is conducted by an experienced technical staff person. EPA is also including overhead costs associated with employing an experienced technical staff person, such as paid leave, health insurance, retirement savings, office space, telephones, computers, and other business expenses.

EPA assumed that federal staff-level burden hours would be completed by an experienced technical staff person being paid at a GS-13, Step 3 federal government employee salary of \$106,586.00/year.<sup>2</sup> EPA then divided the annual 2013 GS-13, Step 3 salary rate by 2080 (the number of hours in a work year) and multiplied this number by the standard government overhead factor of 1.6. This calculation resulted in a federal cost of \$81.99/burden hour.

EPA also assumed that managerial oversight would be completed by a manager being

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<sup>2</sup> January 2016 U.S. Office of Personnel Management, Salary Table 2013-GS, 2013 General Schedule, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/DET.pdf>.

paid at the GS-14, Step 3 federal government employee salary of \$126,270/year. EPA then divided the annual 2016 GS-14, Step 3 of \$126,270 salary rate by 2080 (the number of hours in a work year) and multiplied this number by the standard government overhead factor of 1.6. This calculation resulted in a federal cost of \$97.13/burden hour.

EPA also uses Senior Environmental Employees (SEEs) to support SmartWay. For the SEE employees, EPA used the average hourly rate for Level IV Technical Staff of \$16.39 multiplied by 1.43 benefits rate for \$23.44/burden hour. Labor rates for SEE employees are based on standard rates applied by Senior Service America, Inc., the administrator of a grant program that makes SEE employees available to the EPA.

These estimates are summarized in Exhibit 2.

In Table 6.3, EPA presents a summary of the total estimated annual Agency burden for the SmartWay program.

**Table 6.3  
Total Estimated Annual Agency Burden and Cost**

<b>Respondent Type</b>	<b>Annual Burden Hours</b>	<b>Total Annual Labor Costs</b>	<b>Total Annual Capital Cost</b>	<b>Total Annual O&amp;M Cost</b>	<b>Total Annual Cost</b>
Agency	4,688	\$170,831	\$0	\$349	\$171,180

**15. Explain the reasons for any program changes or adjustments reported on the burden worksheet (in hour or cost burden.)**

Elimination of the Affiliate Challenge and efficiencies gained through the use of the online reporting tool have created burden reductions of 22 and 1,105 respectively for a total reduction 1,127 hours. These reductions counteract a total burden increase of 733 hours that results from increased participation in the program and burden calculation adjustments. In this renewal ICR there is an anticipated net reduction of 394 hours.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

The information collected is not published.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

EPA is not seeking approval to not display the expiration date for OMB approval.

**18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”**

There are not exceptions to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

**Exhibit 1**

**Estimated Annual Respondent Burden and Cost  
US EPA SmartWay Program**

<b>Information Collection Activity</b>	<b>Hours and Costs per Respondent</b>				<b>Response Hours/Year</b>	<b>Labor Cost/ Year</b>	<b>Capitol Startup Costs</b>	<b>O&amp;M Costs</b>	<b>Number of Respondents</b>
	<b>2019 Legal</b>	<b>2019 Manager</b>	<b>2019 Technical</b>	<b>2019 Clerical</b>					
<u>Unloaded Wage Rates</u>	\$ 69.86	\$ 58.88	\$ 45.08	\$ 19.73					
<u>Loaded Wage Rates</u>	\$ 111.78	\$ 94.21	\$ 72.13	\$ 31.75					
<b>Affiliate Agreement</b>									
Review Affiliate Agreement	0.25	0.25	0.16	0	0.66	\$63.04	0	\$0.00	26
Return Affiliate Agreement to EPA	0	0	0	0.16	0.16	\$5.08	0	\$0.00	26
Subtotal	0.25	0.25	0.16	0.16	0.82	\$68.12	\$0.00	\$0.00	26
<b>New/Initial SmartWay Reporting Tool</b>									
Review Partnership Annual Agreement	0	0.24	0.16	0	0.4	\$34.18	0	\$0.00	403
Gather data & info for reporting tool	0	0.5	1.46	0	1.96	\$152.41	0	\$0.00	403
Input data into reporting tool	0	0	1	0.94	1.94	\$101.98	0	\$0.00	403
Review reporting tool	0	0.2	0.5	0	0.7	\$54.91	0	\$0.00	403
Send completed reporting tool to EPA	0	0	0.16	0	0.16	\$11.54	0	\$0.00	403
Subtotal	0	0.94	3.28	0.94	5.16	\$355.02	\$0.00	\$0.00	403
<b>Update/Annual SmartWay Reporting Tool</b>									
Gather Data & Info to Update reporting tool	0	0	1	0	1	\$72.13	0	\$0.00	3,750
Input data into reporting tool	0	0	0	0.5	0.5	\$15.88	0	\$0.00	3,750
Review reporting tool	0	0.5	0.5	0	1	\$83.17	0	\$0.00	3,750
Send reporting tool to EPA	0	0	0	0.16	0.16	\$5.08	0	\$0.00	3,750
Subtotal	0	0.5	1.5	0.66	2.66	\$176.26	\$0.00	\$0.00	3,750
<b>Update/Annual SmartWay Online Tool</b>									
Gather Data & Info to Update reporting tool	0	0	0.25	0	0.25	\$18.03	0	\$0.00	500
Input data into reporting tool	0	0	0	0	0	\$0.00	0	\$0.00	500
Review reporting tool	0	0.1	0.1	0	0.2	\$16.63	0	\$0.00	500
Send reporting tool to EPA	0	0	0	0	0	\$0.00	0	\$0.00	500
Subtotal	0	0.1	0.35	0	0.45	\$34.67	\$0.00	\$0.00	500
<b>SmartWay Excellence Awards</b>									
Gather information for EPA consideration	0	0	2	0	2	\$144.26	0	\$0.00	132
Review and Send Information to EPA	0	0.5	0.5	0.25	1.25	\$91.11	0	\$0.00	132
Subtotal	0	0.5	2.5	0.25	3.25	\$235.37	\$0.00	\$0.00	132
<b>Awareness Assessment</b>									
Complete and submit online assessment	0	0.25	0	0	0.25	\$23.55	0	\$0.00	150
Subtotal	0	0.25	0	0	0.25	\$23.55	\$0.00	\$0.00	150
<b>SmartWay Tractor &amp;Trailer Program</b>									
Buyers complete the Equipment Checklist	0	0.5	1.75	0.5	2.75	\$189.21	0	\$0.00	19
OEMs updating License Agreement	0	0.09	0.32	0.09	0.5	\$34.42	0	\$0.00	16
Subtotal	0	0.59	2.07	0.59	3.25	\$223.63	\$0.00	\$0.00	35
<b>Totals</b>	<b>0.25</b>	<b>3.13</b>	<b>9.86</b>	<b>2.6</b>	<b>15.84</b>	<b>1116.6029</b>	<b>0</b>	<b>0</b>	<b>499</b>

**Exhibit 2**

**Estimated Annual Agency Burden and Cost**

**US EPA SmartWay Program**

Information Collection Activity	Hours and Costs per Respondent						Total Hours and Cost			
	2020 Manager	2020 Technical	2020 SEE	Agency Hours/ Year	Labor Costs/ Year	Annual Capital Startup Costs	Annual O&M Costs	Number of Respond. Activities	Total Agency Hours/ Year	Total Cost/ Year
	\$ 97.13	\$ 81.99	\$ 23.44							
<b>Partnership and Affiliate Agreements</b>										
Review & process submitted Affiliate Agreements	0.03	0.00	0.08	0.11	\$ 4.79	0.00	0.00	457	50.27	\$2,189
Send a Letter Welcoming Partner to SmartWay Program	0.00	0.00	0.08	0.08	\$ 1.88	0.00	0.50	457	36.56	\$857
Update EPA/SmartWay Website-Affiliates	0.00	0.00	0.08	0.08	\$ 1.88	0.00	0.00	457	36.56	\$857
<b>Subtotal</b>	<b>0.03</b>	<b>0.00</b>	<b>0.24</b>	<b>0.27</b>	<b>\$ 8.54</b>	<b>0.00</b>	<b>228.50</b>	<b>457</b>	<b>123.39</b>	<b>\$3,902</b>
<b>New SmartWay Reporting Tools</b>										
Review and Evaluate Reporting Tools	0.00	0.25	1.50	1.75	\$ 55.65	0.00	0.00	427	747.25	\$23,764
Update SmartWay partner database with Reporting Tool Data	0.00	0.00	0.50	0.50	\$ 11.72	0.00	0.00	427	213.50	\$5,004
Update EPA/SmartWay Website	0.00	0.00	0.00	0.00	\$ -	0.00	0.00	427	0.00	\$0
<b>Subtotal</b>	<b>0.00</b>	<b>0.25</b>	<b>2.00</b>	<b>2.25</b>	<b>\$ 67.37</b>	<b>0.00</b>	<b>0.00</b>	<b>427</b>	<b>960.75</b>	<b>\$28,768</b>
<b>Update SmartWay Air Pollutant Tracking System</b>										
Review and Evaluate Updated Excel Reporting Tools	0.00	0.08	0.50	0.58	\$ 18.28	0.00	0.00	3493	2025.94	\$63,845
Review and Evaluate On-Line Truck Reporting Tools	0.00	0.08	0.25	0.33	\$ 12.42	0.00	0.00	500	165.00	\$6,209
Update SmartWay Partner Acct Mgmt D-base with Updated Reporting Tools	0.00	0.08	0.08	0.16	\$ 8.43	0.00	0.00	3993	638.88	\$33,678
<b>Subtotal</b>	<b>0.00</b>	<b>0.16</b>	<b>0.58</b>	<b>0.74</b>	<b>\$ 39.13</b>	<b>0.00</b>	<b>0.00</b>	<b>3993</b>	<b>2954.82</b>	<b>\$97,523</b>
<b>SmartWay Excellence Awards</b>										
Develop Awards Criteria	0.08	0.50	0.00	0.58	\$ 48.77	0.00	0.00	132	76.56	\$6,437
Review Database for Environmental Data	0.00	0.50	1.00	1.50	\$ 64.43	0.00	0.00	132	198.00	\$8,505
Receive and review other information submitted	0.00	1.00	0.50	1.50	\$ 93.71	0.00	0.00	132	198.00	\$12,369
Notify partners that will receive award	0.00	0.08	0.16	0.24	\$ 10.31	0.00	0.50	132	31.68	\$1,427
<b>Subtotal</b>	<b>0.08</b>	<b>2.08</b>	<b>1.66</b>	<b>3.82</b>	<b>\$ 217.21</b>	<b>0.00</b>	<b>66.00</b>	<b>132</b>	<b>504.24</b>	<b>\$28,738</b>
<b>Awareness Assessment</b>										
Review assessment, research focus and questions	0.08	0.50	0.00	0.58	\$ 48.77	0.00	0.00	132	76.56	\$6,437
Process assessment and present results to internal audiences	0.00	0.25	0.00	0.25	\$ 20.50	0.00	0.00	132	33.00	\$2,706
<b>Subtotal</b>	<b>0.08</b>	<b>0.75</b>	<b>0.00</b>	<b>0.83</b>	<b>\$ 69.26</b>	<b>0.00</b>	<b>0.00</b>	<b>132</b>	<b>109.56</b>	<b>\$9,143</b>
<b>SmartWay Tractor-Trailer</b>										
Review Partner application submission	0.00	1.00	0.10	1.10	\$ 84.33	0.00	0.00	22	24.20	\$1,855
Send logo graphic files to Partner	0.00	0.50	0.00	0.50	\$ 40.99	0.00	0.00	22	11.00	\$902
Review and file license agreement	0.00	0.25	0.00	0.25	\$ 20.50	0.00	0.00	16	4.00	\$328
Send logo digital graphic files to partners	0.00	0.25	0.00	0.25	\$ 20.50	0.00	0.00	16	4.00	\$328
<b>Subtotal</b>	<b>0.00</b>	<b>2.00</b>	<b>0.10</b>	<b>2.10</b>	<b>\$ 152.99</b>	<b>0.00</b>	<b>54.60</b>	<b>76</b>	<b>35.20</b>	<b>\$2,757.21</b>
<b>Totals</b>	<b>0.19</b>	<b>5.24</b>	<b>5</b>	<b>10</b>	<b>\$ 555</b>	<b>-</b>	<b>\$ 349</b>	<b>5,217</b>	<b>4,688</b>	<b>\$170,831</b>