

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

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

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal),
EPA ICR Number 2066.10, OMB Control Number 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) were proposed on May 14, 2002; promulgated on May 27, 2003; and amended on both June 3, 2020 (85 FR 34326) and November 19, 2020 (85 FR 73854). These regulations apply to either new or reconstructed engine test cells/stands located at major source facilities that are being used for testing internal combustion engines. An engine test cell/stand is any apparatus used for testing uninstalled stationary or uninstalled mobile (motive) engines. A plant site that is a major source of hazardous air pollutant (HAP) emissions emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAPs at a rate of 25 tons (22.68 megagrams) or more per year. New facilities include those that commenced either construction or reconstruction after the date of proposal. The amendments to the rule, finalized on June 3, 2020, eliminate the SSM exemption, remove the SSM plan and SSM recordkeeping requirements, and require electronic submittal of performance test results. The November 19, 2020, amendments include notification and recordkeeping requirements that apply to sources choosing to reclassify to area source status and to sources that revert to major source status, including a requirement for electronic notification. This information is being collected to assure compliance with 40 CFR Part 63, Subpart P.

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

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least 5 years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. If there is no such delegated authority, the EPA regional office can review them. All other reports are sent to the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the EPA's regional offices. The use of the term

"Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

The "Affected Public" are owners or operators of engine test cells/stands. The 'burden' to the Affected Public may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal). The 'burden' to the "Federal Government" is attributed entirely to work performed by either Federal employees or government contractors and may be found at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal).

There are currently 59 major sources with one or more engine test cell/stands that are subject to the NESHAP. Of these, only 8 sources are currently subject to emission limits, performance testing, recordkeeping, and reporting requirements under 40 CFR Part 63, Subpart P.¹ None of the 8 facilities in the United States are owned by either state, local, tribal entities or the Federal government. They are all owned and operated by privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries.

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

Over the next three years, approximately 8 respondents per year will be subject to these standards. The EPA estimates two new sources will be constructed over the next three years that will be subject only to the initial notification requirement.

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

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports;

¹ There are no requirements applicable to the remaining 51 major sources because they are either: existing affected sources, new/reconstructed sources used to test internal combustion engines with rated power less than 25 horsepower (19 kilowatts), or new/reconstructed sources used solely for testing combustion turbines, rocket engines, research, teaching, and/or testing fuels.

(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, hazardous air pollutant 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.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with these standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, that leaks are being detected and repaired, and that the standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

Additionally, the EPA is requiring electronic reporting for certain notifications or reports. The EPA is requiring that owners or operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b), notifications of change in information already provided required in 40 CFR 63.9(j), performance test reports required in 40 CFR 63.9350(f), and semiannual compliance reports required in 40 CFR 63.9350(a) through the EPA's CDX, using CEDRI. For the notifications required in 40 CFR 63.9(b) and 63.9(j), owners and operators would be required to upload a portable document format (PDF) file of the required notifications. For semiannual compliance reports required in 40 CFR 63.9350(a), the EPA has developed a

template for the reporting form in CEDRI specifically for 40 CFR Part 63, Subpart P.

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests and performance evaluations. The EPA is requiring that 40 CFR Part 63, Subpart P performance test reports and performance evaluation data be submitted through the EPA's ERT.

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

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart P.

3(a) Nonduplication

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as for state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

For all other reports, 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 standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards; therefore, duplication does not exist.

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

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (86 FR 8634) on February 8, 2021. No comments were received on the burden published in the *Federal Register* for this renewal.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The list of facilities subject to Subpart P was developed using EPA's Enforcement and Compliance History Online (ECHO) database and information collected during the development of the June 3, 2020 final risk and technology review. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 8 respondents will be subject to the standard over the three-year period covered by this ICR.

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 the standards has been previously reviewed to determine the minimum information needed for

compliance purposes. In developing this ICR, we contacted both the National Marine Manufacturers Association, at (312) 946-6200, and The Truck and Engine Manufacturers Association, at (312) 929-1970.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

3(d) Effects of Less-Frequent Collection

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to these standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance, and to determine the appropriate level of enforcement action. The EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to either the destruction or nonexistence of essential records.

3(f) Confidentiality

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

3(g) Sensitive Questions

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

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

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

Standard (40 CFR Part 63, Subpart P P P P P)	SIC Codes	NAICS Codes
Turbine and Turbine Generator Set Units Manufacturing	3511	333611
Other Engine Equipment Manufacturing	3519	333618
Other Motor Vehicle Parts Manufacturing	3519	336390
Farm Machinery and Equipment Manufacturing	3523	333111
Lawn and Garden Tractors and Home Lawn and Garden Equipment Manufacturing	3524	333112
Construction Machinery Manufacturing	3531	333120
Farm Machinery and Equipment Manufacturing	3559	333111
Other Commercial and Service Industry Machinery Manufacturing	3559, 3589, 3599	333318
Speed Changers, Industrial High-Speed Drives, and Gears Manufacturing	3566	333612
Motors and Generator Manufacturing	3621	335312
Automobile Manufacturing	3711	336111
Heavy Duty Truck Manufacturing	3711	336120
Light Truck and Utility Vehicle Manufacturing	3711	336112
Military Armored Vehicle, Tank, and Tank Component Manufacturing	3711, 3795	336992
Motor Vehicle Gasoline Engine and Engine Parts Manufacturing	3714	336310
Motor Vehicle Transmission and Power Parts Manufacturing	3714	336350
Aircraft Manufacturing	3721	336411
Research and Development in the Physical, Engineering, and Life	3721	541713

Standard (40 CFR Part 63, Subpart P P P P P)	SIC Codes	NAICS Codes
Sciences		
Aircraft Engine and Engine Parts Manufacturing	3724	336412
Research and Development in the Physical, Engineering, and Life Sciences	3724	541713
Guided Missile and Space Vehicle Manufacturing	3761	336414
Research and Development in the Physical, Engineering, and Life Sciences	3761	541713
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	541713
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	541715
Testing Laboratories	8734	541380
Automobile Driving Schools	8299	611692
General Automotive Repair	7538	811111
Other Automotive Mechanical and Electrical Repair and Maintenance	7539	811118
Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance	7699	811310
Home and Garden Equipment Repair and Maintenance	7699	811411
Space Research and Technology	9661	927110
National Security	9711	928110

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the NESHAP for Engine Test Cells/Stands (40 CFR Part 63, Subpart P) (Renewal).

A source must make the following reports:

Notifications	
Notification of alternative monitoring method	§63.9345(a), §§63.8(f)(4), (6)
Waiver of recordkeeping or reporting requirements	§63.10(f)
Notification of reclassification to area source status or to revert to major source status (electronic submission)	§63.9(b), §63.9(j)
<i>Engine Test Cells/Stands Testing Internal Combustion Engines with a Rated Power of Less Than 25 hp</i>	
Initial notification for engine test cells/stands testing internal combustion engines with a rated power of less than 25 hp	§63.9290(c), §63.9345(b)(3)
<i>Engine Test Cells/Stands 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), §63.9345(d)
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	
Excess emissions and parameter exceedance reports	§63.10(e)(3)
Semiannual compliance reports (including reports of deviations) (electronic submission)	§§63.9350(a)-(c), §63.9340(b), §63.10(a), §63.10(e)
Semiannual CEMS or CPMS deviation reports	§63.9350(d), §63.10(e)
Performance test reports (electronic submission)	§63.9350(f), §63.10(d)

A source must keep the following records:

Recordkeeping	
Records of all reports and notifications	§63.9355(a)(1), §63.10(b)
Records of all performance evaluations	§63.9355(a)(2), §63.10(b), §63.7(g)
Records of each control device malfunction	§63.9355(a)(3)
Records of control device maintenance	§63.9355(a)(4), §63.10(b)
Records of data needed to determine compliance with emission limitation	§§63.9355(a)(5)-(8)
Records for sources with continuous monitoring systems	§63.9355(a)(2), §63.9355(b), §63.9355(c), §63.10(b), §63.10(c), §63.7(g)
Records of continuous compliance with each emission limitation that applies	§63.9355(d)
Records of applicability	§63.10(b)(3)
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.

The rule was recently amended to include electronic reporting provisions on June 3, 2020 and November 19, 2020. Respondents are required to use the EPA's ERT to develop performance test reports and submit them through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts.

Respondents are also required to submit electronic copies of notifications and certain reports through EPA's CEDRI. The semiannual reports are to be created using Form 5900-523, the electronic template attached to this Supporting Statement. The template is an Excel spreadsheet which can be partially completed and saved for subsequent semiannual reports to limit some of the repetitive data entry. It reflects the reporting elements required by the rule and does not impose additional reporting elements. The OMB Control Number is displayed on the Welcome page of the template, with a link to an online repository that contains the PRA requirements.

Respondents are also required to use the EPA’s CEDRI to submit notification in the event of reclassification to area source status and to sources that revert to major source status. The notification is a one-time notification already required in 40 CFR 63.9(j) in the case where the facility is notifying of a change in major source status, and is an upload of the currently required notification in PDF file. For purposes of this ICR, it is assumed that there is no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically.

Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. For additional information on the Paperwork Reduction Act requirements for CEDRI and ERT for this rule, see: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

(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.
Perform initial performance test, Reference Method 1 or 1A, 2, 2A, 2C, 2D, 2F, or 2G, 3, 3A or 3B, 4, 10 or 10B, 25 or 25A, 204, 204B, 204C, 204D, or 204E ANSI/ASME PTC 19.10-1981 tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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

5(a) Agency Activities

The EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

Agency Activities
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source’s initial capability to comply with the emission 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. The EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices, and EPA headquarters. The EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

5(c) Small Entity Flexibility

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

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart PPPPP) (Renewal).

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 830 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

This ICR uses the following labor rates:

Managerial	\$153.55 (\$73.12 + 110%)
Technical	\$122.20 (\$58.19 + 110%)
Clerical	\$61.51 (\$29.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, “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 standards 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 these regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(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 for CPMS	\$500	0	\$0	\$300	8	\$2,400 ^a

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

There are no total capital/startup costs for this ICR. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$2,400. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$2,400. These are 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. The 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 \$3,750.

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

Managerial	\$69.04 (GS-13, Step 5, \$43.15 + 60%)
Technical	\$51.23 (GS-12, Step 1, \$32.02 + 60%)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 + 60%)

These rates are from the Office of Personnel Management (OPM), 2021 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 at the end of this document in Table 2: Average Annual EPA Burden and Cost – NESHP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 8 existing respondents will be subject to these standards. It is estimated that no additional respondents per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 8 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ^a	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	8	0	0	8
2	0	8	0	0	8
3	0	8	0	0	8
Average	0	8	0	0	8

^a New respondents include sources with constructed, reconstructed and modified affected facilities.

^b Two additional sources are expected to become subject to the rule over the three-year period of this ICR but are expected to be subject only to the initial notification requirements and therefore, are not included in this table. These two additional sources are not subject to emission limits, performance testing, recordkeeping, and reporting requirements.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 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	0.67	0	0.67
Notification of construction/reconstruction	1	0	0	0
Notification of actual startup	1	0	0	0

Total Annual Responses				
Performance evaluation report ^a	1	0	0	0
			Total (rounded)	17

^a Performance test data and performance evaluation data must be developed using EPA’s ERT and submitted through the EPA’s CEDRI.

The number of Total Annual Responses is 17.

The total annual labor costs are \$98,100. Details regarding these estimates may be found at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal).

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 at the end of this document, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 830. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal).

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

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 49 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$2,400. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 75 labor hours at a cost of \$3,750; see below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical

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

6(f) Reasons for Change in Burden

There is a decrease in burden from the most-recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. The regulations were previously amended in a Risk and Technology Review (RTR) on June 3, 2020 at 85 FR 34326. The change in the burden and cost estimates in this ICR occurred because the revised standard has been in effect for 1.5 years and the requirements are different during initial compliance (new facilities) as compared to on-going compliance (existing facilities). The previous ICR (2066.09) reflected those burdens and costs associated with the initial activities for those facilities subject to the June 3, 2020 final rule. This ICR (2066.10) reflects the ongoing burden and costs for existing facilities. The final rule amendments eliminated the SSM exemption, removed the SSM plan and SSM recordkeeping requirements, and required electronic submittal of performance test results. This ICR adjusts the burden following the June 3, 2020 final rule to reflect the current number of entities anticipated to be subject to the rule and assumes the one new source identified in the RTR has already complied with the initial notification and testing requirements, resulting in a decrease in the capital/startup costs. This ICR retains the assumption in the final rule ICR that two new sources will submit an initial notification over the next three years, but will not be subject to emission limits, performance testing, recordkeeping, and reporting requirements. No new sources that would be subject to the emission limits, performance testing, recordkeeping and reporting requirements are anticipated during the three-year period of this ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 49 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2020-0640. An electronic version of the public docket is

available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. Due to COVID-19 precautions, entry to the Reading Room is available by appointment only. Please contact personnel in the Reading Room to schedule an appointment. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2020-0640 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 – NESHAP for Engine Test Cells/Standards (40 CFR Part 63, Subpart P) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarization with regulatory requirements ^a	4	1	4	8	32	1.6	3.2	\$4,352.91
B. Notifications ^c								
Initial notifications ^c	2	1	2	0.67	1.33	0.07	0.13	\$181.19
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
Compliance status report ^d	4	2	8	8	64	3	6	\$8,705.82
Performance evaluation report	16	1	16	0	0	0	0	\$0
Subtotal for Reporting Requirements					112			\$13,240
4. Recordkeeping requirements								
A. Initial performance evaluation ^e	330	1	330	0	0	0	0	\$0
B. Monitoring demonstration ^e	148	1	148	0	0	0	0	\$0
C. Repeat performance evaluation ^e	330	1	330	0	0	0	0	\$0
D. Maintain records of CEMS performance ^f	1.5	52	78	8	624	31.2	62.4	\$84,881.78
Subtotal for Recordkeeping Requirement					718			\$84,882
Total Labor Burden and Costs (rounded) ^g						830		\$98,100
Total Capital and O&M Cost (rounded) ^g								\$2,400
GRAND TOTAL (rounded) ^g								\$101,000

Assumptions:

^a We assume that the average number of respondents subject to the rule will be 8, and that no new facilities will become subject to the 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: \$122.20 (technical), \$153.55 (managerial), and \$61.51 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2021, “Table 2. Civilian workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c We assume that two new sources will be constructed over the next three years that will be subject only to the initial notification requirement in §63.9345(b)(3) and §63.9(b)(2)(i) through (v).

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

^e We assume there are no new respondents required to perform the initial performance evaluation, monitoring demonstration, or repeat performance evaluation due to failure.

^f We assume that owners and operators will maintain CEMS monitoring records on a weekly basis.

^g 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) (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technica l person- hours per year (E=CxD)	(F) Managemen t person- hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Total Cost, \$ ^b
1. Attend CEMS performance evaluation	32	1	32	0	0	0	0	\$0
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	2	32	1.6	3.2	\$1,838.56
4. Reporting requirements								
A. Review waivers ^d	2	2	4	0	0	0	0	\$0
B. Review reports								
Review initial notifications	2	1	2	0.67	1.33	0.07	0.13	\$76.53
Compliance status report ^e	2	2	4	8	32	1.6	3.2	\$1,838.56
Performance evaluation report	2	1	2	0	0	0.0	0	\$0
TOTAL ANNUAL BURDEN AND COST (rounded)^f						75		\$3,750

Assumptions:

^a We assume that the average number of respondents subject to the rule will be 8, and that no new facilities will become subject to the recordkeeping and reporting requirements of the rule over the three-year period of this ICR.

^b This ICR uses the following labor rates: \$51.23 (technical), \$69.04 (managerial), and \$27.73 (clerical). These rates are from the Office of Personnel Management (OPM), 2021 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

^c We assume that 20 percent of all respondents will be out of compliance.

^d We assume that none of the respondents are submitting waivers for recordkeeping and reporting requirements.

^e Compliance status reports review is required semiannually. We assume 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.

**Appendix A – Electronic Reporting Template
(see attachment - Form 5900-523)**