

Supporting Statement for Information Collection Request

EXECUTIVE SUMMARY

Title: Greenhouse Gas Endangerment Finding and Motor Vehicle Emission Standards Reconsideration

EPA ICR No.: 2734.03

OMB Control No.: 2060-0753

Docket ID No.: EPA-HQ-OAR-2025-0194

Abstract: This ICR covers information collection activities associated with EPA's proposed rule to reconsider the 2009 Greenhouse Gas Endangerment Finding (endangerment finding), with respect to heavy-duty vehicles (HDV). EPA is proposing the removal of all regulations that require new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions. The proposed rule would include the removal of regulations in Parts 85, 86, 600, 1036, 1037, and 1039 of Title 40 of the Code of Federal Regulations (CFR) that pertain to the control of GHG emissions from highway light-, medium- and heavy-duty vehicles, such as emission standards, test procedures, averaging, banking, and trading (ABT) reporting, and or fleet-average emission requirements. As a result of the proposed changes, engine and vehicle manufacturers would no longer have any future obligations for the measurement, control, and reporting of GHG emissions for any highway engine and vehicle, including model years manufactured prior to the proposal. However, EPA is not reopening and retains, without modification, regulations necessary for criteria pollutant and air toxic measurement and standards, Corporate Average Fuel Economy testing, and associated fuel economy labeling requirements.

This Information Collection Request, EPA ICR 2734.03, revises EPA ICR 2734.02 (OMB Control Number 2060-0753), originally prepared for EPA's 2024 HD Phase 3 (HDP3) rulemaking¹ and updates the information collection burden contained in that request. EPA ICR 2734.02 (the "2024 ICR") contained the information collection requirements for EPA's HDV GHG emissions program adopted in the 2024 rulemaking. This ICR 2734.03 revises the 2024 ICR to remove the activities associated with EPA's proposal to remove GHG regulations, as briefly described in Section 12 and in more detail in **Supplemental Information**, Section 8. There were no non-GHG information collection activities included in the 2024 rulemaking or in the 2024 ICR, and therefore the net effect of this revised ICR is to remove the entire information collection burden contained in the 2024 ICR.

¹ Final Rule: Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles – Phase 3, 83 FR 29440, April 22, 2024; a copy of this rule may be found at: <https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-greenhouse-gas-emissions-standards-heavy-duty>

Burden Statement: The annual public reporting and recordkeeping burden for the revised collection, after removal of the heavy-duty GHG provisions, is estimated to be 0 hours per respondent because all GHG regulations are proposed to be removed and there were no non-GHG reporting requirements included in the original Information Collection Request. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose, or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

SUPPORTING STATEMENT

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.

Consistent with EPA's proposed rule to reconsider the 2009 Greenhouse Gas Endangerment Finding (endangerment finding) and remove all regulations that require new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions, the Agency is revising EPA ICR No. 2750.02 to remove all HDV GHG information collection requirements contained in that ICR. No information will be collected under this revised ICR.

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.

Consistent with EPA's proposed rule to reconsider the 2009 Greenhouse Gas Endangerment Finding (endangerment finding) and remove all regulations that require new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions, the Agency is revising EPA ICR No. 2750.02 to remove all HDV GHG information collection requirements contained in that ICR. No information will be collected under this revised ICR.

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.

Consistent with EPA's proposed rule to reconsider the 2009 Greenhouse Gas Endangerment Finding (endangerment finding) and remove all regulations that require new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions, the Agency is revising EPA ICR No. 2750.02 to remove all HDV GHG information collection requirements contained in that ICR. No information will be collected under this revised ICR.

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.

Consistent with EPA's proposed rule to reconsider the 2009 Greenhouse Gas Endangerment Finding (endangerment finding) and remove all regulations that require new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions, the Agency is revising EPA ICR No. 2750.02 to remove all HDV GHG information collection requirements contained in that ICR. No information will be collected under this revised ICR.

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

Consistent with EPA's proposed rule to reconsider the 2009 Greenhouse Gas Endangerment Finding (endangerment finding) and remove all regulations that require new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions, the Agency is revising EPA ICR No. 2750.02 to remove all HDV GHG information collection requirements contained in that ICR. No information will be collected under this revised ICR.

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.

Consistent with EPA's proposed rule to reconsider the 2009 Greenhouse Gas Endangerment Finding (endangerment finding) and remove all regulations that require

new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions, the Agency is revising EPA ICR No. 2750.02 to remove all HDV GHG information collection requirements contained in that ICR. No information will be collected under this revised ICR.

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

- a) requiring respondents to report information to the agency more often than quarterly;**
- b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- c) requiring respondents to submit more than an original and two copies of any document;**
- d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- e) 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;**
- f) requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- g) 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**
- h) 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.**

Consistent with EPA's proposed rule to reconsider the 2009 Greenhouse Gas Endangerment Finding (endangerment finding) and remove all regulations that require new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions, the Agency is revising EPA ICR No. 2750.02 to remove all HDV GHG information collection requirements contained in that ICR. No information will be collected under this revised ICR.

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.

EPA will solicit comments on the Information Collection Request as part of the public process for this proposal. A copy of this Supporting Statement will be included in the docket for the proposal, EPA-HQ-OAR-2025-0194.

EPA has ongoing outreach efforts with stakeholders as part of our rule development and our implementation activities.

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

There are no payments or gifts to respondents; there is no remuneration of contractors or grantees for this engine and vehicle certification program.

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 system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Consistent with EPA's proposed rule to reconsider the 2009 Greenhouse Gas Endangerment Finding (endangerment finding) and remove all regulations that require new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions, the Agency is revising EPA ICR No. 2750.02 to remove all HDV GHG information collection requirements contained in that ICR. No information will be collected under this revised ICR.

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.

Consistent with EPA's proposed rule to reconsider the 2009 Greenhouse Gas Endangerment Finding (endangerment finding) and remove all regulations that require new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions, the Agency is revising EPA ICR No. 2750.02 to remove all HDV GHG information collection requirements contained in that ICR. No information will be collected under this revised ICR.

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

- (a) 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.**
- (b) If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- (c) 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'.**

This revised Information Collection Request reflects the estimated burden after removing heavy-duty GHG reporting requirements from EPA ICR 2734.02 (OMB Control Number 2060-0753).

The total labor burden to respondents or recordkeepers resulting from the collection of information is 0 hours because all GHG regulations adopted in 2024 are proposed to be removed and there were no non-GHG reporting requirements associated with activities included in the original Information Collection Request.

EPA is proposing the removal of all regulations that require new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions. This proposal would include the removal of regulations in Parts 85, 86, 600, 1036, 1037, and 1039 of Title 40 of the Code of Federal Regulations (CFR) that pertain to the control of GHG emissions from highway light-, medium- and heavy-duty vehicles, such as emission standards, test procedures, averaging, banking, and trading (ABT) reporting, and or fleet-average emission requirements. As the result of the proposed changes, engine and vehicle manufacturers would no longer have any future obligations for the measurement, control, and reporting

of GHG emissions for any highway engine and vehicle, including model years manufactured prior to the proposal.

See **Supplemental Information**, Section 8, for additional information about information that will no longer be collected.

The 2024 Information Collection Request, EPA ICR 2734.02, used the Bureau of Labor Statistics' (BLS) 2016 National Industry-specific Occupational Wage Estimates for the Engine, Turbine and Power Transmission Equipment Manufacturing Industry (NAICS 333600, available at https://www.bls.gov/oes/2016/may/naics4_333600.htm). EPA used mean hourly rates increased by a factor of 2.1 to account for benefits and overhead. The labor costs used in the 2024 ICR are set out in Table 1.

For the number of respondents by manufacture category, see SUPPLEMENTAL INFORMATION, Section 4, below.

Table 1 - Labor Cost Estimates

Occupation	SOC Code Number	Mean Hourly Rate	Adjusted Mean Hourly Rate (Including Benefits and Overhead)
Mechanical Engineers	17-2141	\$45.17	\$94.86
Engineering Managers	11-9041	\$72.53	\$152.31
Lawyers	23-1011	\$85.75	\$180.08
Mechanical Engineering Technicians	17-3027	\$31.81	\$66.80
Computer and Information Analysts	15-1210	\$43.78	\$91.94
Secretaries, Except Legal, Medical and Executives	43-6014	\$21.84	\$45.86
Mechanical Engineering Technicians	17-3027	\$31.81	\$66.80

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).

(a) 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.

(b) 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.

(c) 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.

Table 2 summarizes the estimated labor and cost burden associated with the proposal to remove GHG regulations. It includes the original burden estimates for the 2024 HDP3 rulemaking, the estimated changes from the proposal to remove the GHG standards and related requirements, and the remaining burden after the GHG standards and related requirements are removed. Detailed estimates are provided in the appendices to this document.

Removal of the GHG standards and related requirements from the heavy-duty vehicle program results in a revised information collection of \$0 for EPA ICR 2734.03.

Table 2 – Information Collection Burden Estimates

		No. Respondents	Total Hours	Total costs/year	Total Capital and O&M	Hours/Respondent
Old Estimated Burden (EPA ICR 2734.02)	Criteria Pollutants	77	-	-	-	-
	GHG	77	7,411	1,622,394	936,500	96
	Total		7,411	1,622,394	936,500	96
Estimated Burden Removed	Criteria Pollutants	77	-	-	-	-
	GHG	77	7,411	1,622,394	936,500	96
	Total		7,411	1,622,394	936,500	96
New Estimated Burden (EPA ICR 2734.03)	Criteria Pollutants	77	-	-	-	-
	GHG	77	-	-	-	-
	Total		-	-	-	-

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.

In the original 2024 Information Collection Request, EPA 2734.02, we included a one-time \$350,000 cost, which was an estimate of the share of the total annual EV-CIS contracting cost for the HDV Phase 3 certification data system module. We also estimated an annual Agency burden equivalent to 1 full time EPA employee (2,080 hours) and \$200,000 in contracting costs during the years 2025 through 2028 to account for EPA's post-rule monitoring of the implementation of the heavy-duty vehicle GHG programs. Removal of the GHG standards and related requirements from the heavy-duty vehicle program would remove these burdens, which reduces the EPA burden of the 2024 HDP3 rule to \$0. The Agency burden is set out in Table 3.

Table 1 - EPA Burden

	Collection Activity	No. Respondents	Total Hours	Total costs/year
Old Estimated EPA Burden (EPA ICR 2734.02)	Changes to EV-CIS to reflect new standards (one-time cost)	N/A ¹	\$350,000	N/A ¹
	New post-rule data collection	2,080 (1 FTE)	\$200,000	2,080 (1 FTE)
	Total		\$550,000	
Elements Removed	Changes to EV-CIS to reflect new standards (one-time cost)	N/A ¹	\$350,000	N/A ¹
	New post-rule data collection	2,080 (1 FTE)	\$200,000	2,080 (1 FTE)
	Total		\$550,000	
New Estimated EPA Burden (EPA ICR 2734.03)	Changes to EV-CIS to reflect new standards (one-time cost)	-	-	-
	New post-rule data collection	-	-	-
	Total	-	-	-

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

This is a revised Information Collection Request for a proposed rulemaking, amending the information collection request for the original 2024 HDP3 rulemaking. There are no program changes or adjustments reported on the burden worksheet.

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.

Consistent with EPA's proposed rule to reconsider the 2009 Greenhouse Gas Endangerment Finding (endangerment finding) and remove all regulations that require new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions, the Agency is revising EPA ICR No. 2750.02 to remove all HDV GHG information collection requirements contained in that ICR. No information will be collected under this revised ICR.

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.

Consistent with EPA's proposed rule to reconsider the 2009 Greenhouse Gas Endangerment Finding (endangerment finding) and remove all regulations that require new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions, the Agency is revising EPA ICR No. 2750.02 to remove all HDV GHG information collection requirements contained in that ICR. No information will be collected under this revised ICR.

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

EPA does not request an exception to the certification of this information collection.

SUPPLEMENTAL INFORMATION

1. Statutory Authorities

The sections of the CAA that provide statutory authority for the requirements contained in this proposed rule are 202, 203, 206, 207, 208, 213, 216, and 301 (42 U.S.C. 7521, 7522, 7525, 7541, 7542, 7547, 7550, and 7601).

2. Affected CFR Regulations

The provisions in the Code of Federal Regulations (CFR) regulations affected by the proposed rule are set out in Table 4:

Table 2 - Principal Regulations Amended by the Proposed Rule

Industry	40 CFR ² Part
Requirements for LD and MD Engines & Vehicles	85, 86, 600
Control of Emissions from New and In-Use Heavy-Duty Highway Engines	1036
Control of Emissions from New Heavy-Duty Motor Vehicles	1037
Control of Emissions from New and In-Use Nonroad Compression-Ignition Engines	1039

3. Industries affected

Respondents are manufacturers that sell or import into the United States new heavy-duty highway engines and vehicles. Respondents affected by the proposal are classified in the North American Industry Classification System codes (NAICS) listed in Table 5.

Table 3 - Respondents North American Industry Classification Codes

NAICS Code ^a	NAICS Title
336110	Automobile and Light-duty Motor Vehicle Manufacturing
336120	Heavy Duty Truck Manufacturing
336211	Motor Vehicle Body Manufacturing
336213	Motor Home Manufacturing
336310	Motor Vehicle Gasoline Engine and Engine Parts Manufacturing
336390	Other Motor Vehicle Parts Manufacturing
333618	Other Engine Equipment Manufacturing
423110	Automobile and Other Motor Vehicle Merchant Wholesalers
811198	All Other Automotive Repair and Maintenance

^a NAICS Association. NAICS & SIC Identification Tools. Available online: <https://www.naics.com/search>.

² Code of Federal Regulations, <https://www.ecfr.gov>. EPA emissions regulations are found in Title 40.

4. Number of Respondents

There are 77 heavy-duty manufacturers that would be affected by this revised Information Collection Request. These are the same companies that were expected to be affected by the 2024 HDP3 rulemaking.

5. Respondent Activities

Consistent with EPA's proposed rule to reconsider the 2009 Greenhouse Gas Endangerment Finding (endangerment finding) and remove all regulations that require new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions, the Agency is revising EPA ICR No. 2750.02 to remove all HDV GHG information collection requirements contained in that ICR. No information will be collected under this revised ICR and therefore there are no respondent activities.

6. Agency Activities

Consistent with EPA's proposed rule to reconsider the 2009 Greenhouse Gas Endangerment Finding (endangerment finding) and remove all regulations that require new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions, the Agency is revising EPA ICR No. 2750.02 to remove all HDV GHG information collection requirements contained in that ICR. No information will be collected under this revised ICR and therefore there are no Agency activities.

7. Programmatic Information Collection Request

The reporting requirements for EPA's HDV program are covered by a "programmatic" Information Collection Request: Emissions Certification and Compliance Requirements for Nonroad Compression-ignition Engines and On-highway Heavy Duty Engines (Revision), EPA ICR 1684.21, OMB Control Number 2060-0287. A copy of that document can be found in the docket for that ICR, EPA-HQ-OAR-2007-1182, and at <https://www.reginfo.gov, PRA Search Criteria: OMB Control Number=2060-0287.>

8. Description of Information to be Collected by Manufacturers

a) Description of Information Required to be Collected by Manufacturers

Manufacturers would not be required to collect any information under this revised Information Collection Request pursuant to the proposal to remove all GHG standards.

b. Description of Information No Longer to be Collected by Manufacturers

Consistent with EPA's proposed rule to reconsider the 2009 Greenhouse Gas Endangerment Finding (endangerment finding) and remove all regulations that require new motor vehicle and new motor vehicle engine manufacturers to measure, report, or comply with standards for greenhouse gas (GHG) emissions, the Agency is revising EPA ICR No. 2750.02 to remove all HDV GHG information collection requirements contained in that ICR:

- All manufacturers: review the new regulations and making general systems changes to reporting processes, for all manufacturers.
- Manufacturers of plug-in hybrid and battery electric vehicles: implement a new regulation to provide customer-facing battery state-of-health monitors and make associated changes to vehicle owners manuals.
- EV manufacturers: report warranty periods on their certification application and updating owners manuals.

All of the above activities are proposed to be removed from the HDV regulations, and thus there would be no reporting requirements.

LIST OF ATTACHMENTS

Attachment A: Original Estimated Burden from EPA ICR 2734.02, OMB Control 2060-0753

Attachment B: GHG Burden Removed from EPA ICR 2734.02, OMB Control 2060-0753

Attachment C: Revised Net Burden Remaining EPA ICR 2734.03, OMB Control 2060-NEW

**Attachment A: Original Estimated Burden from
EPA ICR 2734.02, OMB Control 2060-0753**

Information Collection Activity	Burden and Cost Per Application										Total Burden and Cost			
	Engineer hourly rate	Manager hourly rate	Legal hourly rate	Mechanical Engineer Technical hourly rate	IT Analysts hourly rate	Clerical hourly rate	Total Labor Hours	Total Labor Costs	Capital Startup Costs	O&M Cost	Frequency ¹ (Estimated Responses per Respondent)	Number of Respondents	Total Hours	Total Costs
	\$94.86	\$152.31	\$180.08	\$66.80	\$91.94	\$45.86								
HD engine manufacturers: review of new regulations, general reporting system changes	20	10	5	5	0	0	40	\$4,655	\$0	\$ 200	1.0	77	3,080	\$ 373,808
EV vehicle battery health monitor and owners man. update	20	3	0	20	0	15	58	\$4,378	\$0	\$15,100	1.0	61	3,538	\$1,188,162
EV manufacturers only - report warranty periods pursuant to new regulatory requirement and update owners manual to show regulatory warranty periods	1	1	1	5	0	5	13	\$991	\$0	\$ -	1.0	61	793	\$ 60,425
Total							111	\$10,023	\$0	\$15,300		77	7,411	\$1,622,394

¹Estimated Responses per Respondent refers to the number of times a respondent performs each task per year. Generally, this refers to the number of applications in each category, which is often the number of engine families. In this case, there are no reporting burdens apart from reviewing the regulations, which is a one-time activity for each manufacturer.

**Attachment B: GHG Burden Removed from
EPA ICR 2734.02, OMB Control 2060-0753**

Information Collection Activity	Burden and Cost Per Application										Total Burden and Cost			
	Engineer hourly rate	Manager hourly rate	Legal hourly rate	Mechanical Engineer Technical hourly rate	IT Analysts hourly rate	Clerical hourly rate	Total Labor Hours	Total Labor Costs	Capital Startup Costs	O&M Cost	Frequency ¹ (Estimated Responses per Respondent)	Number of Respondents	Total Hours	Total Costs
	\$94.86	\$152.31	\$180.08	\$66.80	\$91.94	\$45.86								
HD engine manufacturers: review of new regulations, general reporting system changes	20	10	5	5	0	0	40	\$4,655	\$0	\$ 200	1.0	77	3,080	\$ 373,808
EV vehicle battery health monitor and owners man. update	20	3	0	20	0	15	58	\$4,378	\$0	\$15,100	1.0	61	3,538	\$1,188,162
EV manufacturers only - report warranty periods pursuant to new regulatory requirement and update owners manual to show regulatory warranty periods	1	1	1	5	0	5	13	\$991	\$0	\$ -	1.0	61	793	\$ 60,425
Total							111	\$10,023	\$0	\$15,300		77	7,411	\$1,622,394

¹Estimated Responses per Respondent refers to the number of times a respondent performs each task per year. Generally, this refers to the number of applications in each category, which is often the number of engine families. In this case, there are no reporting burdens apart from reviewing the regulations, which is a one-time activity for each manufacturer.

**Attachment C: Revised Net Burden Remaining
EPA ICR 2734.03, OMB Control 2060-NEW**

Information Collection Activity	Burden and Cost Per Application										Total Burden and Cost			
	Engineer hourly rate	Manager hourly rate	Legal hourly rate	Mechanical Engineer Technical hourly rate	IT Analysts hourly rate	Clerical hourly rate	Total Labor Hours	Total Labor Costs	Capital Startup Costs	O&M Cost	Frequency ¹ (Estimated Responses per Respondent)	Number of Respondents	Total Hours	Total Costs
	\$94.86	\$152.31	\$180.08	\$66.80	\$91.94	\$45.86								
HD engine manufacturers: review of new regulations, general reporting system changes	0	0	0	0	0	0	0	\$0	\$0	\$0	1.0	77	0	\$0
EV vehicle battery health monitor and owners man. update	0	0	0	0	0	0	0	\$0	\$0	\$0	1.0	61	0	\$0
EV manufacturers only - report warranty periods pursuant to new regulatory requirement and update owners manual to show regulatory warranty periods	0	0	0	0	0	0	0	\$0	\$0	\$0	1.0	61	0	\$0
Total												77	0	\$0

¹Estimated Responses per Respondent refers to the number of times a respondent performs each task per year. Generally, this refers to the number of applications in each category, which is often the number of engine families. In this case, there are no reporting burdens apart from reviewing the regulations, which is a one-time activity for each manufacturer.