

SUPPORTING STATEMENT FOR
INFORMATION COLLECTION REQUEST RENEWAL:

**"INFORMATION COLLECTION ACTIVITIES
ASSOCIATED WITH EPA'S MOBILE
AIR CONDITIONER RETROFITTING PROGRAM"**

EPA ICR No. 1774.04

December 2006

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

This ICR is entitled "Information Collection Activities Associated with EPA's Mobile Air Conditioner Retrofitting Program," EPA ICR Number 1774.04, and OMB Number 2060-0350 (Renewal).

1(b) Short Characterization

The Significant New Alternatives Policy (SNAP) Program enables the Agency to review available substitutes for ozone depleting substances (ODSs) and determine their acceptability. The Stratospheric Protection Division (SPD) is responsible for enacting regulations to phase out chemicals which damage the stratospheric ozone layer and therefore pose a threat to human health and the environment. Depletion of stratospheric ozone can result in sharp increases in melanoma and non-melanoma cancers due to increased exposure to ultraviolet-A (UV-A) and ultraviolet-B (UV-B) radiation, and a higher incidence of cataracts (a leading cause of blindness). Under the SNAP program, companies submit applications for approval of substitutes for ozone-depleting chemicals for review by the SPD. After all necessary information is received, SPD has 90 days to review the product data submitted, and determine if the substitute is acceptable, unacceptable, or if its use must be restricted. SPD reviews these substitutes for their impact on human health and the environment, looking at factors including ozone depleting potential, atmospheric lifetime, global warming potential, and flammability. Many substitutes are produced for multiple uses, and SPD must determine what uses are appropriate, and under what conditions. EPA does not evaluate the efficacy of the product to achieve the results the manufacturer intended. When SPD makes a decision that substitutes are acceptable, a Notice is published in the Federal Register listing acceptable substitutes. If the substitute is found

unacceptable, or use restrictions are necessary, a notice-and-comment rulemaking is necessary to impose use restrictions. The list of substitutes is cumulative, with revisions to the list made periodically. A comprehensive list of substitutes, their uses, and any relevant restrictions is maintained for distribution to interested parties.

SPD requires those retrofitting mobile air conditioners (MAC) to use a substitute refrigerant to provide some basic information on a label to be affixed to the air conditioner. The label includes the name of the substitute refrigerant, when and by whom the retrofit was performed, environmental and safety information about the substitute refrigerant, and other information. This information is needed so that subsequent technicians working on the MAC system will be able to service the equipment properly, decreasing the likelihood of significant refrigerant cross-contamination and potential failure of air conditioning systems and refrigerant recovery/recycling equipment.

EPA estimates that 87,000 technicians will be responsible for providing this information over the next 3 years, at a total cost (labor plus materials) of \$5,933,333.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need and Authority for the Collection

The SNAP program includes review of potential alternatives to ozone-depleting refrigerants used for air conditioning motor vehicles. With the phase out of chlorofluorocarbons (CFCs), and specifically CFC-12, SPD faces the challenge of identifying acceptable alternative refrigerants to allow consumers the choice to retrofit CFC-12 mobile air conditioners to those alternatives. EPA notes that in the U.S., prior to the 1993 model year, most all mobile air conditioners used CFC-12, and that after the 1995 model year, all new motor vehicles with air conditioners used HFC-134a. EPA estimates that there are currently approximately 33 million mobile air conditioners, originally designed to use CFC-12, operating in the U.S. Of these, EPA estimates 1 million, or about 9%, will be retrofitted to use alternative refrigerants between April 1, 2007 and March 31, 2010 (the term of this ICR). The remaining air conditioners either (1) will continue to operate without service, (2) will continue to operate with minor service including refilling with available supplies of CFC-12, (3) will be disposed of along with the entire motor vehicle, (4) will cease to function but will not be retrofitted due to economic reasons, or (5) have already been retrofitted to an alternative refrigerant and will not be retrofitted again.

The purpose of this Information Collection Request (ICR) is to estimate the burden associated with the 40 Code of Federal Regulations (CFR) Part 82 requirement that service technicians label mobile air conditioners with information about new refrigerants when they retrofit a system. It is necessary to assess the time it will take for the service technician to fill out and place the label on the retrofitted air conditioner. This label will acknowledge that the retrofitting has been completed, and that the mobile air conditioner should no longer use CFC refrigerant. In addition, the label provides essential information to technicians about the specific refrigerant used in the air conditioning system.

Section 612 of the Clean Air Act (CAA) requires EPA to promulgate rules making it unlawful to replace any ozone-depleting substance with any substitute that the Administrator determines may present adverse effects to human health or the environment where the Administrator has identified an alternative that (1) reduces the overall risk to human health and the environment, and (2) is currently, or potentially available. EPA is concerned that the existence of several substitutes in this end-use may increase the likelihood of significant refrigerant cross-contamination and potential failure of both air conditioning systems and recovery/recycling equipment. In addition, continuing the smooth transition to the use of substitutes strongly depends on the continued purity of the recovered, recycled and/or reclaimed R-12 supply.

2(b) Practical Utility/Users of the Data

The purpose of the label is to alert service technicians and motor vehicle owners that the mobile air conditioner has been retrofitted to use non-CFC refrigerant. The label will provide essential information to technicians about the specific refrigerant used in the air conditioning system. Technicians need this information to avoid service practices that might result in refrigerant cross-contamination and system failure. As the stores of CFC refrigerant are depleted, vehicles are being retrofitted to use alternative refrigerants.

3. NON DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non duplication

The required label is put on CFC-12 air conditioners that are being retrofitted with an acceptable substitute. The label will be the only required mechanism to indicate the use of a substitute, and therefore will not be duplicative.

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

A Federal Register Notice (71 FR 34604) making this supporting statement available for public comment was submitted and published. No public comments were received.

3(c) Consultations

EPA consulted with the following individuals in preparing this ICR renewal:

- Ward Atkinson, Chairman of the Interior Climate Control Committee of Society of Automotive Engineers (SAE), (602) 956-9313, regarding the number of air conditioners likely to be retrofitted and the cost burden.
- Elvis Hoffpauir, President of Mobile Air Conditioning Society Worldwide, (215) 631-7020, regarding the percent of air conditioners likely to be retrofitted.
- Peter Coll, Neutronics Inc., 610-524-8800, regarding the percent of air conditioners likely to be retrofitted.
- Jim Thomas, Refrigerant Services Inc., 902-468-4997, regarding the cost of labels.
- Doug Pettigrew, ICOR International, 317-826-3200, regarding the cost of labels.

3(d) Effects Of Less Frequent Collection

This ICR asks for information to be collected just once per mobile air conditioner retrofit.

3(e) General Guidelines

This ICR follows all of OMB's general guidelines for information collections.

3(f) Confidentiality

This ICR does not ask for any information that would be considered confidential.

3(g) Sensitive Questions

This ICR does not ask any questions concerning sexuality, religious beliefs, or other matters usually considered private.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and SIC Codes

The following is a list of Standard Industrial Classification (SIC) codes and associated industries that may retrofit a mobile air conditioner and therefore may be affected by information collection requirements covered under this ICR. Also listed are the corresponding North American Industry Classification System (NAICS) codes available from <http://www.census.gov/epcd/www/naics.html>.

551	New and used car dealers (NAICS code 441110)
554	Gas service stations (NAICS codes 447110 and 447190)
7532	Top and body repair shops (NAICS code 811121)
7538	General automotive repair shops (NAICS code 811111)
7539	Automotive repair shops not elsewhere classified, including air conditioning and radiator specialty shops (NAICS code 811198)

4(b) Information Requested

The Agency will not standardize the label, but rather allow the industry to devise a format that accommodates information about the refrigerants on the market. Unique fittings are necessary for different refrigerants in order to avoid cross contamination, as is the use of different colored labels for each refrigerant. EPA will work closely with refrigerant developers to eliminate the risk of duplication. The person conducting the retrofit must apply to the air conditioning system in the engine compartment a label that contains the following information:

- The name and address of the technician and the company performing the retrofit.
- The date of the retrofit.

- The trade name, charge amount, and, when applicable, the numerical designation of the refrigerant as determined under the latest version of Standard 34 of the American Society of Heating, Refrigerating, and Air-conditioning Engineers (ASHRAE), Inc..
- The type, manufacturer, and amount of lubricant used.
- If the refrigerant is, or contains an ozone-depleting substance, the phrase "ozone depleter".
- If the refrigerant displays flammability limits as measured according to latest version of Standard E681 of the American Society for Testing and Materials (ASTM) International, the statement "This refrigerant is FLAMMABLE. Take appropriate precautions."

5. THE INFORMATION COLLECTED – AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

The Agency will not develop a format for the label and will not collect and compile the information provided on the label.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

EPA will not develop a standard label, but rather the manufacturers will have the opportunity to produce unique labels to accompany their refrigerant. Much of the information required on the labels can be printed with the labels, thereby lessening the burden on the individual service shops, many of which are small businesses. These labels may also contain information about the specific fittings the service technician should use, with the subject refrigerant, to minimize the potential for cross-contamination if the system is serviced at a later date. EPA will work closely with industry in carrying out these labeling requirements, because there are several manufacturers who have alternative refrigerant products on the market. Proper labeling will result in considerable savings to industry and the public, since it will greatly reduce the chance of refrigerant contamination. There are now 15 alternative refrigerants on the market listed under the SNAP program as acceptable replacements for CFC-12 for mobile air conditioning. Considerable costs would accrue if refrigerants were contaminated (mixed), including the costs to repair systems which failed as a result and the costs to recover, separate, reclaim and/or dispose of contaminated refrigerant.

To estimate the total number of retrofits to occur by March 31, 2010, the date this ICR will expire, the Agency analyzed publicly available data for vehicle sales in the U.S. The U.S. Department of Transportation, Federal Highway Administration, Office of Highway Policy Information website provided vehicle (cars, trucks and buses) sales from 1970 through 2000, citing Ward's 2001 as the source. EPA assumed that the penetration of air conditioning in these vehicles rose linearly from 70% in 1970 to 98% in 1998 and remained at 98% thereafter. EPA assumed that 100% of the air conditioners were designed for CFC-12 for years 1970 through 1991, 67% for 1992, 33% for 1993, and 0% thereafter. EPA assumed the lifetime of service of an air conditioner follows a Poisson distribution with an average lifetime of 12 years. Using this

method, EPA estimates that there are currently approximately 12 million mobile air conditioners, originally designed to use CFC-12, operating in the U.S. Of these, EPA estimates 1 million, or about 9%, will be retrofitted to use alternative refrigerants between April 1, 2006 and March 31, 2010 (the term of this ICR). The remaining air conditioners either (1) will continue to operate without service, (2) will continue to operate with minor service including refilling with available supplies of CFC-12, (3) will be disposed of along with the entire motor vehicle, (4) will cease to function but will not be retrofitted due to economic reasons, or (5) have already been retrofitted to an alternative refrigerant and will not be retrofitted again.

EPA estimates the time to complete and apply the required label at 5 minutes per mobile air conditioner.

6(b) Estimating Respondent Costs

EPA estimates the cost per label to be \$0.10.

EPA estimates the time to complete and apply the label at 5 minutes per mobile air conditioner. Based on recent consultation with the industry, EPA uses an estimate of \$70 per hour loaded labor rate (includes: wages paid to the technician; benefits including paid leave, health insurance, retirement savings and legally required benefits; and overhead, including office space, furniture, equipment and computers, supplies and other business expenses). Thus the loaded labor cost per response is approximately \$5.83.

6(c) Estimating Agency Burden And Cost

The data required on the label is not submitted to the EPA; therefore, the Agency burden and cost is zero.

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

The U.S. Department of Labor statistics indicate there are 168,630 automotive body and related repairers (Standard Occupation Classification [SOC] System Code Number 49-3021) and 701,150 automotive service technicians and mechanics (SOC Code Number 49-3023) in the U.S. EPA estimates that 87,000 of them, or approximately 10% of the total, will be responsible for retrofitting the estimated 1,000,000 mobile air conditioners over the three-year term (333,333 hours per year) of this ICR.

EPA estimates the time to complete and apply the label at 5 minutes per mobile air conditioner, making the total burden 83,333 hours (27,777 hours and 40 minutes per year). At an estimated average labor rate of \$70 per hour, the overall cost associated with the burden hours is \$5,833,333 (\$1,944,444 per year). The cost for designing, typesetting, printing and distributing 1,000,000 labels is estimated at \$0.10 per label to be \$100,000 (\$33,333 per year). Adding the labor and capital costs together yields a total cost burden of \$5,933,333 (\$1,977,778 per year).

6(e) Bottom Line Burden Hours And Cost Tables

As indicated in 6(c), there is no burden or cost to the Agency; therefore, the bottom-line burden hours and costs are equivalent to the respondent burden hours and costs:

Responses:	333,333 per year
burden hours:	27,777 hours and 40 minutes per year
burden costs: direct:	\$33,333 per year
labor:	\$1,977,778 per year

6(f) Reasons for Change in Burden

This represents a decrease in the burden estimated for the previous three-year term of this ICR. Previously, an estimate of 1,000,000 responses per year was given for a total annual burden of 83,333 hours and \$2,011,111. The decrease of 55,555 hours per year is because of the aging CFC-12 car population. After 1994, new cars in the US were no longer sold with CFC-12 air conditioning systems. The number of operating CFC-12 cars (i.e., pre-1994 cars) has decreased since this last ICR renewal. With fewer CFC-12 cars, there are fewer cars that will be retrofit to a new refrigerant and subject to this ICR.

6(g) Burden Statement

The annual public reporting and record keeping burden for this collection of information is estimated to average 0.083 hours (5 minutes) per response (i.e., to fill out the information required on the label and affix it to the air conditioner). Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to, or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit, or otherwise disclose the information.

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. Submit your comments, referencing Docket ID No. EPA-HQ-OAR-2006-0482 to (1) EPA online using www.regulations.gov (our preferred method), by email to a-and-r-docket@epa.gov or by mail to: EPA Docket Center, Environmental Protection Agency, the Air and Radiation Docket, Mail Code 6102T, 1200 Pennsylvania Ave., NW, Washington, DC 20460, under Docket ID No. EPA-HQ-OAR-2006-0482. The EPA Docket Center Public Reading Room is located in Room 3334 of the EPA-West Building, located at 1301 Constitution Ave., NW, in Washington, D.C. The Docket Center is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket is (202) 566-1742. Also, comments may be submitted 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 No. (EPA-HQ-OAR-2006-0482) and OMB control number (2060-0350) in any correspondence.