**SUPPORTING STATEMENT FOR**

**EPA INFORMATION COLLECTION REQUEST NUMBER** 2349.01

**EPA’S GREENCHILL PROGRAM**

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**1. IDENTIFICATION OF THE INFORMATION COLLECTION**

**1(a) Title of the Information Collection**

This ICR is entitled "Reporting and Recordkeeping Requirements Under EPA's GreenChill Program,"

**1(b) Short Characterization/Abstract**

GreenChill is a voluntary program sponsored by the U.S. Environmental Protection Agency (EPA) that encourages supermarket companies to adopt cost effective technologies and practices that reduce refrigerant emissions and improve operational efficiency. Refrigerants used in supermarkets are often ozone-depleting substances as well as potent greenhouse gas. The GreenChill Program works with the supermarket industry to remove barriers that inhibit the implementation of technologies and practices that reduce refrigerant emissions. The Program effectively promotes the adoption of emission reduction practices and technologies by engaging GreenChill partners to set an annual refrigerant emission reduction goal and develop a Refrigerant Management Plan reflecting the company’s implementation objectives. Implementation of the partners’ Refrigeration Management Plan to reduce refrigerant emissions enhances the protection of the environment and may save Partners money and improve operational efficiency.

Participation in GreenChill begins with the completion and submittal of a one-page Partnership Agreement that outlines responsibilities of the GreenChill partner company and EPA. The Partnership Agreement commits a GreenChill partner to review its activities that may result in refrigerant emissions and to develop a Refrigerant Management Plan that is appropriate for their operating circumstances to reduce refrigerant emissions.

GreenChill partners agree to submit a Refrigerant Management Plan shortly after signing the Partnership Agreement and to submit an Annual Report. Annual reporting is a key requirement of the Program. Upon acceptance into the Program, EPA requires partners to submit an Annual Report documenting the previous year’s refrigerant emissions and the Refrigerant Management Plan for the upcoming year. Partners must report refrigerant emission reduction activities on an annual basis. Partners are encouraged to communicate the success of their refrigerant emission reduction efforts and EPA helps partners communicate these successes. EPA also provides Program implementation assistance by analyzing emerging technologies and conducting roundtable discussions, partner meetings and webinars.

This voluntary agreement can be terminated by the GreenChill partner or EPA with no notice or penalties or further obligation.

The GreenChill Program offers the opportunity for any individual store to be GreenChill certified at the silver-, gold- or platinum-level when it demonstrates that the amount of refrigerant used is below a specified limit, based on the store’s MBTU/hour cooling load, and that the refrigerant emitted from the store in the prior 12 months is below a specified percentage depending on each GreenChill store certification level. Information submitted for the certification of individual stores is simply compared to these set criteria for each certification level and is not used to characterize the program’s or the company’s achievements. The certification of a store provides the opportunity for broad recognition within the supermarket industry and with the store’s customers.

**1(c) Terms of Clearance of the Information Collection**

OMB noted that EPA should be careful to not characterize data reported by Partner companies as an aggregate summary of emissions reductions resulting from the Program.  EPA recognizes that some of the activities and emissions reductions reported by Partners may have been achieved in the absence of the Program.  EPA also recognizes that there are emissions reductions occurring in the industry that have been a direct or indirect result of the influence of the Program, but are not being reported to EPA.  As a result, EPA has been and will continue to be clear in any Program related communication that when providing a summary or an aggregation of emission reductions it is appropriately characterized as resulting from Partners’ reported activities.

OMB understands that EPA is committed to improving its ability to meaningfully evaluate the contributions of voluntary programs characterized by the absence of readily available, high quality, or detailed data, particularly on non-participants. After assessing available methods from the literature that may be useful in this context, EPA/NCEE will undertake one to three case studies to examine how much it can say with regard to the potential role that voluntary programs have played in participant actions. The extent to which these issues can be feasibly and defensibly addressed will depend on the voluntary program and the details of its design and implementation, including its industry context and the environmental problem it has been created to address. OMB will expect a progress report on these efforts when the next renewal for this ICR is submitted.

**2. NEED FOR AND USE OF THE COLLECTION**

**2(a) Need/Authority for the Collection**

EPA has developed this ICR to obtain authorization to collect information from GreenChill partners. EPA needs to collect initial information via the one-page Partnership Agreement. The Partnership Agreement provides general information for a new GreenChill partner company and includes relevant points of contact. EPA uses information obtained from the Partnership Agreement to identify and initiate communication with the partners.

The Refrigerant Management Plan and annual reporting are necessary to evaluate a partner's progress in implementing the Program and to assess overall partner results in relation to their commitments. The information provided in the Plan and through annual reporting also allows EPA to track actions to reduce refrigerant emissions, to reduce amounts of installed refrigerant and to adopt advanced refrigerant technologies. The information provided helps EPA better target its technical and other assistance to partners.

EPA also collects information from any individual store that seeks to obtain GreenChill store certification at either the silver-, gold-, or platinum-level by meeting the criteria for amount of refrigerant used per million British Thermal Units per hour (MBTU/hr) of cooling load for the store and by meeting the criteria of percentage of emitted refrigerant over the prior year.

**2(b) Practical Utility/Users of the Data**

EPA uses information in the Partnership Agreement to populate its contacts database/tracking system with information on GreenChill partners (current and past). This information is maintained in the contacts database/tracking system and serves as a source of general information as well as a mailing list.

EPA uses information submitted in the Refrigerant Management Plan and Annual Report to document the progress of partner companies in implementing the Program and reducing refrigerant emissions. EPA enters Annual Report information received from partners into a GreenChill spreadsheet database. On an annual basis, EPA also aggregates these data and prepares the Program Accomplishments Flyer and partner summary reports. In aggregating data, EPA ensures the confidentiality of the information submitted by each company. EPA determines the weighted-average emission rate for the reporting GreenChill partner companies for a year. EPA takes the number of stores reported by each company, and the installed amount of refrigerant for the reporting company, as well as the emission of each of the refrigerants to calculate the weighted-average emission rate for reporting GreenChill partners. The aggregated data will be used in two ways:

* The aggregated weighted-average emission rate for GreenChill partners is used to develop estimated projections for future industry-wide emission reductions based on assumptions such as a steady growth in the number of GreenChill partners and changes in the number of supermarkets in the U.S. (as shown in the green line in Figure 1.)
* The Program also aggregates the emission reductions of GreenChill partners in a given year in comparison to the emission rate of each partner’s base year to describe the performance of the GreenChill partners.

With partner permission, EPA uses these data to develop technical documents on specific technologies and practices and prepare case studies showing successful implementation experiences. These documents are publicly available and serve to demonstrate the benefits that can be realized through the implementation of technologies and practices to cut refrigerant emissions and to provide technical assistance.

To facilitate and promote refrigerant emission reductions among the partners, the GreenChill Program undertakes the following activities: :

- Developing technical fact sheets, reports, and articles;

- Hosting technology analysis webinars and roundtable discussions;;

- Providing technical support to partner companies;

- Supporting research activities;

- Publicizing achievements of partner companies; and

- Making available to partners a mechanism for recording and storing information about refrigerant emission reduction activities.

The technical documents and webinars are available to both partners and non-partners. By undertaking the above activities, the EPA lowers the cost of gathering and disseminating information regarding refrigerant emissions to both partners and non-partners of the GreenChill Program. We note that non-partners may choose to undertake the actions based on the technical information provided the GreenChill Program, but the agency does not gather that information. In addition to benefiting partner companies, the above activities benefit non-partner companies. For example, all the technical documents developed by the Program are made available to the public on the GreenChill website, and webinar attendance is not restricted to Program partners. Thus, it is entirely possible that a substantial portion of the supermarket industry that is not participating in GreenChill is also implementing some of the refrigerant emission reduction activities that are encouraged by the Program. As noted above, GreenChill does not attempt to estimate the accomplishments of these companies, even though their activities may be at least partially due to the existence of the GreenChill Program.

The following graph provides industry-wide projections of emissions from U.S. supermarkets under different assumptions. A business-as-usual scenario shows industry-wide emissions assuming that the industry average leak rate of 25% persists into the future (yellow dashed line). Projected emissions under this scenario are very similar to those derived from bottom-up modeling results reported in OAP’s (2014) Abatement Report (purple solid line). The solid green line shows emissions from GreenChill partner companies and potential future partners. Two extreme hypothetical scenarios are also included for comparison: industry emissions assuming all stores emit at the statutory maximum leak rate of 35%, and industry emissions if the industry adopts all available abatement opportunities. This figure is provided for illustrative purposes and does not represent the emission reductions attributable to the GreenChill program.

**\*Notes and Data Sources:**

* Projected industry-wide emissions without GreenChill Program are calculated from the *Global Anthropogenic Non-CO2 Greenhouse Gas Emissions: 1990-2030, (December 2012) (EPA 430-R-12-006)* (purple line)
* GreenChill Program reductions are based on the *U.S. Climate Action Report - 2010, Department of State, Chapters 4 & Table 4-2* (green line)
* Projected emission reductions from an aggressive abatement scenario are based on estimates from *Global Anthropogenic Non-CO2 Greenhouse Gas Emissions: 1990-2030, (December 2012) (EPA 430-R-12-006)* (dotted blue line)
* The overall trend in the projected supermarket emissions absent GreenChill and assuming industry average leak rate trends continue shows growth in emissions from HFCs. (dashed orange line)

The practical utility of the information received by EPA from individual stores seeking GreenChill store certification is to give these stores recognition for their efforts to minimize refrigerant use and refrigerant emissions within the broad industry and with their customers. Individual stores that meet GreenChill store certification criteria can take credit through internal and external announcements that they are taking actions to manage their refrigerant use and emissions and use an announcement to distinguish the store from others in an effort to attract customers.

**3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

**3(a) Nonduplication**

The information to be obtained under this ICR has not been collected by EPA or any other Federal agency. Under Section 608 of the Clean Air Act, the current regulatory limit for the refrigerant leak rate in stationary equipment, such as in supermarkets, is 35 percent of the refrigerant charge of the equipment and companies are required to repair or replace equipment with leaks at or above that level, and only report this information to EPA if the repair or replacement will exceed the regulatory time limit. No other EPA or Federal program collects individual store information regarding the amount of refrigerant per cooling load and the percentage of refrigerant emissions for the prior twelve months.

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

In compliance with the Paperwork Reduction Act of 1995, EPA solicited public comments on the ICR through an announcement in the *Federal Register* (Vol. 74, No. 105) on June 3, 2009). No comments were received in response to the notice.

**3(c) Consultations**

EPA’s GreenChill Partnership had seven pilot program Partners. These pilot Partners were asked how long it took them to complete the activities necessary to provide the information requested for participation in the Partnership. The Partners listed in Table 1 provided input:

|  |  |
| --- | --- |
| Table 1. Partners that provided input to this ICR | |
| **Supermarket** | **Partnership contact** |
| Food Lion | Wayne Rosa |
| Giant Eagle | Cliff Timko |
| Hannaford Bros. Co. | Harrison Horning |
| Harris Teeter | Michael Shepard |
| Publix | Stephen Sloan |
| Supervalu | George Ronn |
| Whole Foods | Kathy Loftus |
| Note: In certain cases information was gained from multiple staff members. Only the designated Partnership contact is listed above. | |

**(d) Effects of Less Frequent Collection**

The completion and submittal of the Partnership Agreement is a one-time activity when companies voluntarily choose to become a partner in the GreenChill Program. Partners must also prepare and submit an annual Refrigerant Management Plan. Partners must also submit an Annual Report while participating in the Program. EPA believes that any reduction in the frequency of this information collection and submittal would impede efforts by EPA to evaluate results of the Program.

The completion and submittal of the GreenChill store certification application is voluntary. There is nothing compelling an individual store to submit the information, however, to get recognized for meeting the GreenChill store certification criteria, whether at the silver-, gold-, or platinum-level, a store will need to provide the information in the application.

**3(e) General Guidelines**

None of these reporting or record keeping requirements violate any of the regulations established by OMB in 5 CFR 1320.5.

**3(f) Confidentiality**

Participation in the GreenChill Program is voluntary. GreenChill partners may designate information submitted under this ICR as confidential business information. EPA will treat such information as confidential business information and will not make the company or agency-specific information collected under this ICR available to the general public.

**3(g) Sensitive Questions**

No questions of a sensitive nature are asked in the Partnership Agreement, the Refrigerant Management Plan, or the Annual Report.

**4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

**4(a) Respondents/NAICS Codes**

From the list of North American Industry Classification System (NAICS) Codes the associated industries that may be affected by information collection requirements covered under this ICR are:

445110 Supermarkets

**4(b) Information Requested**

EPA's GreenChill Program specifies requirements for partners. Companies voluntarily choosing to become a GreenChill partner must sign and submit a one-page Partnership Agreement. Following a compliance review, the company is accepted into the Partnership. The Partnership Agreement identifies company points of contact.

Partners then develop a Refrigeration Management Plan within 6 to 12 months of joining. The GreenChill Program Refrigerant Management Plan facilitates development of a strategy for how partners will identify non-regulatory refrigerant emission reduction activities they intend to undertake, plan for new activities, and develop mechanisms for tracking refrigerant emission reduction data and activities. A Refrigerant Management Plan is a living document that changes over time as each partner's goals and commitment evolve.

Upon joining the Program, partners begin submitting the annual Refrigerant Management Plan and the Annual Report on corporate emissions and installed refrigerants documenting the previous year’s emission reduction activities and corresponding refrigerant emissions reductions.

An individual supermarket that seeks voluntarily to obtain GreenChill store certification at a silver-, gold-, or platinum-level will submit the store certification application which asks for the cooling load of the equipment in the store and the amount of refrigerant used, and the emission rate for the twelve month period.

**Partnership Agreement**

GreenChill partners are required to sign and submit to EPA the one-page Partnership Agreement that describes the terms of participation in the Program.

(i) Data items:

Partners must provide the following information in the Partnership Agreement:

* The name, title, address, telephone and facsimile number, and e-mail address of a GreenChill Program for the primary Implementation Manager and
* The name and signature of the partners' Authorized Company Representative.

(ii) Respondent activities:

In signing the Partnership Agreement, partners must perform the following activities:

* Review the responsibilities outlined for a GreenChill Partner and for EPA in the Partnership;
* Gather requested information and complete the Partnership Agreement; and
* Sign the Partnership Agreement and submit it to EPA.

**Refrigerant Management Plan**

Partners must complete and submit a GreenChill Refrigerant Management Plan within a short time of signing the Partnership Agreement.

(i) Data items:

There is no dictated format for the Refrigerant Management Plan as the GreenChill Program presumes companies already have an operating format for describing the company’s refrigeration management activities and planned changes to stores. The partners are provided with a model of a Refrigerant Management Plan simply as a suggestion. (see Annex I) The Program asks that each partner’s Refrigerant Management Plan include a refrigerant emission reduction goal for the coming calendar year.

The data elements requested to be in every Refrigerant Management Plan are the following information:

* General company information (e.g., company name and contact, position, mail and e-mail addresses, telephone and facsimile numbers, etc.);
* Company’s refrigerant emission rate goal for the year;
* Summary of activities that the partner intends to implement (e.g., numbers of stores with old equipment to be retrofitted, continued or new practices to reduce refrigerant emissions);

(ii) Respondent activities:

Partners must conduct the following activities in preparing the Refrigerant Management Plan:

* Review the instructions;
* Gather the requested information and develop the Refrigerant Management Plan;
* Submit the plan to EPA

**Annual Report**

Annual reporting is a key requirement to remain a partner in the GreenChill Program. Upon acceptance into the Partnership, EPA requires partners to submit an Annual Report that documents corporate-wide installed quantities of refrigerants for the year the Partnership Agreement is completed, or for up to two years prior. This initial Annual Report is used to establish a base year for the partner company. EPA also requires this initial Annual Report to include the corporate-wide refrigerant emissions for this same base year. The initial Annual Report, and every subsequent one, must include the total number of stores used to define corporate-wide data submission. EPA guidance recommends the partner companies pick a fixed date in the year for determining the number stores for Annual Reporting, noting there are changes over a year due to closings, new construction, as well as acquisitions and sales of stores.

(i) Data items:

The Annual Report form requests the following information:

* General company information (e.g., company name and contact, position, mail and e-mail addresses, telephone and facsimile numbers, calendar year covered by report, etc.);
* Number of stores included in the data for the reporting calendar year (this defines the limits of the corporate-wide reporting for a Partner);
* Amount of specific refrigerants (e.g., R-22, R-134A, R-407A) installed in commercial refrigeration equipment with a charge of less than a 50 lbs., and the amount in commercial equipment with a charge of more than 50 lbs., and the amount in air-conditioning equipment (this information is collected by a company on a set date each year to help allow for comparisons across years for the company, and to account for store closings and openings);
* Amount of specific refrigerants emitted during the calendar year reporting period (this information along with the number of stores reported by the company and the total amount of installed refrigerant is used to develop the weighted-average emission reduction aggregated for all reporting GreenChill partner companies);

(ii) Respondent activities:

Partners must conduct the following activities in preparing the Annual Report:

* Review the instructions;
* Gather the requested information for the initial report;
* Complete the initial Annual Reporting form;
* Sign and date the initial report;
* Submit the initial report to EPA; and
* Prepare and submit subsequent Annual Reports.

**Additional Activities**

During participation in the Program, partners are required to notify EPA of any change in GreenChill Program designated liaison.

(i) Data items:

Partner must provide EPA with the name of the new designated liaison

(ii) Respondent activities:

Notify EPA of any change in GreenChill designated liaison.

**Store Certification**

An individual supermarket may voluntarily seek to obtain GreenChill certification by providing information on the store certification application.

1. Data items:

The store certification application asks for the following information:

* General store information (e.g., company name and contact, position, mail and e-mail addresses, telephone and facsimile numbers, calendar year covered by report, etc.);
* The refrigerant charge in the remote commercial refrigeration system and the type of system, the total cooling load for the equipment (MBTU/hour), the refrigerant emission rate from this commercial refrigeration equipment, and a listing of the type of refrigerant in the commercial system and as well as in the HVAC equipment and any self-contained refrigerated equipment in the store. See attached instructions and certification application forms;
* For newly constructed stores, a certification from the installing company that the leak tightness testing protocol was followed to insure a leak-tight installation. See attached instructions and verification form;

1. Respondents Activities

A store that is voluntarily seeking to obtain GreenChill store certification would participate in the following activities:

* Read the instructions for store certification;
* Obtain the information and certifications from the companies that provided the store’s refrigeration equipment;
* Compile the information and complete the store certification application form;
* Sign and date the form;
* Submit the form and accompanying information to EPA.

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

**5(a) Agency Activities**

The GreenChill Program requires EPA to perform activities after a partner submits the Partnership Agreement, the Refrigeration Management Plan, and the Annual Report.

**Partnership Agreement**

EPA must perform the following activities upon receipt of a Partnership Agreement:

* Review the Partnership Agreement to ensure completeness and accuracy, and follow up, if necessary;
* Conduct a compliance screen of the prospective partner company;
* Countersign the Partnership Agreement;
* Develop a cover letter and welcome packet with useful program information;
* Copy the cover letters and Partnership Agreement;
* Send cover letter, original Partnership Agreement with countersign and welcome packet to partner;
* File copies of cover letters and Partnership Agreement; and
* Enter Partner company information into tracking database.

**Refrigerant Management Plan**

EPA must perform the following activities upon receipt of a Refrigerant Management Plan:

* Review the plan to ensure completeness and accuracy, and follow up, if necessary;
* Make copies of the plan for the program files;
* File copies of the plan; and
* Enter information into a tracking database.

**Annual Report**

EPA must perform the following activities upon receipt of an Annual Report:

* Review the report to ensure completeness and accuracy, and follow up, if necessary;
* Make copies of the report;
* File copies of the report; and
* Enter information into an emissions reduction data management database.

**Additional Activities**

EPA also may be required to perform the following additional activity:

Enter any changes in partner's information into a database (e.g., new partner company liaison, newsletter mailing list, etc.).

**Store Certification**

EPA must perform the following activities upon receipt of a store certification application:

* Acknowledge the submission of an application;
* Review the application to ensure completeness and accuracy, and follow-up, if necessary;
* Review the information to determine if the store meets the criteria for a certification level;
* Communicate with the submitter the level of certification, if any.

**5(b) Collection Methodology and Management**

In collecting and analyzing the information associated with this ICR, EPA used typical office equipment such as telephones, computers, and database and word processing software systems.

For the collection of Program information, GreenChill has developed various templates and tools to assist partners. Alternatively, partners are free to use their own reporting format. The standard GreenChill reporting forms are available in both MS Excel and MS Word. Partners using GreenChill templates and/or their own reporting format can submit data to EPA electronically via email.

EPA ensures the accuracy and completeness of collected information by reviewing each submittal. EPA enters the information obtained from the Partnership Agreement, and the Annual Reports into a database and aggregates data obtained from Annual Reports to track the progress of partners in reducing refrigerant emissions. The information submitted in the Refrigerant Management Plans is reviewed and is used in communicating with partners to ask clarifying questions about activities described in the Plan.

**5(c) Small Entity Flexibility**

EPA reviewed available company websites for partner organizations that were believed to be small entities. Upon completion of the review, EPA estimated that several GreenChill partners are small entities. EPA has designed Program forms and the associated electronic reporting system to minimize respondent burden while obtaining sufficient and accurate information. It should be noted that the burden associated with the GreenChill Program is reduced over the course of a partner’s participation.

**5(d) Collection Schedule**

EPA collects initial information in the one-page Partnership Agreement, which is completed and submitted by each partner upon their voluntary decision to participate in the Program. EPA collects information in the Refrigeration Management Plan submitted shortly after a partner signs the Partnership Agreement. Each spring, EPA collects information in the Annual Report to monitor refrigerant emissions reductions progress. Each spring, EPA also collects a Refrigerant Management Plan for the year, including the partner’s refrigerant emission reduction goal for the coming calendar year. EPA may also collect other Program information on a periodic basis or as the information is submitted. This could include notification of changes in a partner's operating circumstance (change in ownership, sale or acquisition of stores, etc.). Submission of store certification applications is based on the desire and schedule of the submitter and is voluntary.

**6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

**6(a) Estimating Respondent Burden**

EPA used input from pilot GreenChill partners and its experience implementing other voluntary programs to estimate burden for respondents. EPA reviewed the pilot Partners’ estimates of hours required to complete each activity. EPA calculated average burden and cost estimates for each respondent activity.

Tables 2a. and 2b. present the burden hours and costs per respondent for the first, second, and third years in the program. The burden hours in the second and third years are less than the first year. A one-time burden in the first year is associated with the Partnership Agreement. The pilot partners indicated the hours required to collect and provide the information for the Refrigerant Management Plan and Annual Report would be less in the second and third years due to a better understanding of the requirements and the experience gained in the first year.

Table 4 presents the estimated annual aggregate burden hours and costs for all respondents during each of the three years covered under this ICR as shown in Table 1. The annual reporting burden for each Partner for this information collection is estimated to be 18.3 hours for the first year and 11.1 hours per year for the second and third years.

Table 5 presents, because the information collection activity by a store to obtain GreenChill certification is done so voluntarily, without any imposition by the agency, the estimated burden hours and estimated costs for one store certification application are presented for both the respondent and for the agency together. Historically, EPA has received about 100 store certification applications each year.

**6(b) Estimating Respondent Costs**

(i) Estimating Labor Costs

To determine respondent costs, an average hourly wage rate of $30.61 per hour, the hourly wage rate for professional and related persons, was derived from the Bureau of Labor Statistics Employer Cost and Employee Compensation, Table 2 (“civilian workers, by occupational and industry group”), June 2012. Burden hours, as described above, were multiplied by the labor rate to determine respondent costs.

(ii) Estimating Capital and Operations and Maintenance Costs

To develop respondent capital and O&M cost estimates, EPA consulted with members of the supermarket industry and commercial refrigeration industry supporting retail food. EPA believes that the capital or operations and maintenance costs of this Program are not significant. EPA has removed O&M costs for postage for respondents because GreenChill partners submit Annual Reports via email in the Excel spreadsheet form. Partners submit Partnership Agreements and Refrigerant Management Plans via email as scanned PDFs or some other type of electronic format. Therefore, costs associated with postage are non-existent.

(iii) Capital/Start-up vs. Operating and Maintenance (O&M) Costs

There are no capital/start-up costs or O&M costs associated with this information collection.

(iv) Annualizing Capital Costs

There are no capital costs associated with this information collection.

**6(c) Estimating Agency Burden and Costs**

Table 3 presents the estimated Agency burden hours and costs for the information collection activities associated with this ICR.

The average hourly rates for EPA technical and managerial staff of $42.66 and $59.30, respectively, are derived from the 2012 general schedule locality pay table for Washington-Baltimore-Northern Virginia, retrieved from the Office of Personnel Management website.

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

The majority of GreenChill partners are large companies. EPA believes that many major supermarket companies have joined the Program. As well, most of the major companies that manufacture and install in supermarkets multiplex refrigeration systems (containing multiple compressors) have already joined the Program. Based on recent Program activity, EPA anticipates that an average of three new partners will join the Program annually.

The average annual cost and burden estimates during the next 3-year ICR period are based on the average number of partners as shown in Table 1.

TABLE 1

Estimated Number of Program Partners in Calendar Years 2011-2013

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Type of Partner | 2011 | 2012 | 2013 | Average |
| New Partners Enrolled Each Year | 3 | 3 | 3 | 35 |
| Total Program Partners | 49 | 51 | 54 | 51 |

**Partnership Agreement**

Each partner must complete and submit a one-page Partnership Agreement to join the Program. EPA expects an average of three new partners completing and submitting a Partnership Agreement each year.

**Refrigerant Management Plan**

Each new partner must complete and submit the Refrigerant Management Plan shortly after signing and submitting the Partnership Agreement. EPA estimates that 98 percent of all existing partners (or 50 out of 51 partner companies) will update their Refrigerant Management Plan in which they set a new corporate refrigerant emission goal and submit it to EPA.

**Annual Report**

All existing partners must complete and submit an Annual Report shortly after joining the Program and then annually in the subsequent years of participation. EPA estimates that completing the initial Annual Report will take approximately twice as long as subsequent Annual Reports. EPA expects that the three new Program partners joining each year will complete and submit an initial report and an average of 51 existing partners (as shown in Table 1) will complete and submit subsequent annual reports.

**Additional Activities**

EPA expects that additional information submittals may be required of some partners. EPA estimates that approximately 10 percent of all partners experience changes in their representative liaison each year. Thus, EPA estimates that an average of 5 partners (51 x 0.1) will notify EPA of changes in the representative liaison.

**6(e) Bottom Line Burden Hours and Costs**

Tables 4 and 3 show the estimated aggregate annual burden and cost to respondents and the government, respectively, for the information collection activities covered under this ICR.

(i) Respondent Tally

The estimated average bottom line burden for respondents is approximately 13.4 hours per year with an estimated average annual cost of approximately $635.34. Over the three-year period covered by this ICR, EPA estimates the average annual burden of the Program for all respondents to be 1688 hours with an average annual cost of $73671.52.

(ii) The Agency Tally

The estimate average annual cost to the Agency is approximately $83,199.62 per year.

(iii) Variations In The Annual Bottom Line

EPA anticipates minimal variation in the annual respondent reporting/recordkeeping burden over the three-year period covered by this ICR.

**6(f) Reasons for Change in Burden**

This is the first ICR for the GreenChill Program.

**6(g) Burden Statement**

The average per partner reporting burden for information collection requirements associated with completing this ICR is estimated to be 13.4 hours.

For new partners, the average reporting burden per partner for information collection requirements associated with completing the Partnership Agreement is estimated to be 5.5 hours. The burden estimate includes time to receive and review the Partnership Agreement; gather information and fill out the Partnership Agreement; and sign and submit the Partnership Agreement to EPA.

For new partners, the average reporting burden per partner for information collection requirements associated with completing the Refrigeration Management Plan is estimated to be 8.5 hours. For years after the first year, the average reporting burden per partner for information collection requirements associated with completing the Refrigeration Management Plan is estimated to be 7.4 hours. The burden estimate includes time to review the plan form; gather the requested information; complete the form; sign and date the form; and submit the form to EPA.

For new partners, the average per partner reporting burden for information collection requirements associated with completing the initial Annual Report is estimated to be 6.3 hours. The average per partner reporting burden for information collection requirements associated with completing subsequent Annual Reports is estimated to be 3.7 hours. The burden estimate includes time to review the reporting package (forms and any Program updates); gather the requested information; complete the form; sign and date the form; and submit the form to EPA.

For GreenChill partners, the average per partner reporting burden for information collection requirements associated with additional activities is estimated to be 1.5 hours. The reporting burden includes time to notify EPA of changes in GreenChill liaison.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may 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.

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-2008-0655, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. 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. 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. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public 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 above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2008-0655 and OMB Control Number 2060-New in any correspondence.

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| |  |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | --- | | **Table 2a. Estimated Individual Respondent Burden -- Year 1** | **Hours and Costs per Respondent/Activity -- New Respondents** | | | | | | | | |  | Manager | Technical | Clerical | Legal | Consultant | Respond. Hrs. / Activity | Labor Costs / Activity | Annual O&M Costs | |  | $58.13 | $47.90 | $24.12 | $50.85 | $30.61 | | **Information Collection Activity** | Hours | Hours | Hours | Hours | Hours | | **Partnership Agreement** |  |  |  |  |  |  |  |  | | Receive and review the Partnership Agreement | 1.6 | 0.0 | 0.3 | 1.3 | 0.0 | 3.2 | $166.35 | $0.00 | | Gather information and complete the Partnership Agreement | 1.5 | 0.0 | 0.1 | 0.2 | 0.1 | 1.9 | $102.84 | $0.00 | | Sign and submit the Partnership Agreement to EPA | 0.1 | 0.0 | 0.3 | 0.0 | 0.0 | 0.4 | $13.05 | $0.00 | | **SUBTOTAL** |  |  |  |  |  | 5.5 | $282.24 |  | | **Refrigerant Management Plan** |  |  |  |  |  |  |  |  | | Gather information and develop Plan | 2.4 | 0.8 | 0.5 | 0.0 | 0.0 | 3.7 | $189.89 | $0.00 | | Develop an emission reduction goal for next year | 1.9 | 0.6 | 0.6 | 0.0 | 0.0 | 3.1 | $153.66 | $0.00 | | Gain corporate approval for Plan | 1.0 | 0.0 | 0.0 | 0.2 | 0.2 | 1.4 | $74.42 | $0.00 | | Sign and submit the Plan to EPA | 0.2 | 0.0 | 0.1 | 0.0 | 0.0 | 0.3 | $14.04 | $0.00 | | **SUBTOTAL** |  |  |  |  |  | 8.5 | $432.01 | $0.00 | | **Annual Report** |  |  |  |  |  |  |  |  | | Select base year and aggregate information on installed refrigerant and emissions | 1.6 | 0.5 | 0.3 | 0.0 | 0.9 | 3.3 | $151.74 | $0.00 | | Complete the Annual Report form | 1.2 | 0.8 | 0.7 | 0.0 | 0.0 | 2.7 | $124.96 | $0.00 | | Sign and submit the Annual Report to EPA | 0.2 | 0.0 | 0.1 | 0.0 | 0.0 | 0.3 | $14.04 | $0.00 | | **SUBTOTAL** |  |  |  |  |  | 6.3 | $290.74 | $0.00 | | Total |  |  |  |  |  | 20.3 | $1,004.99 | $0.00 | |  | | | | | | | |
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| **Table 2b. Estimated Individual Respondent Burden -- Existing Partners** | **Hours and Costs per Respondent/Activity -- Existing Partners** | | | | | | | |
|  | Manager | Technical | Clerical | Legal | Consultant | Respond. Hrs. / Activity | Labor Costs / Activity | Annual O&M Costs |
|  | $58.13 | $47.90 | $24.12 | $50.85 | $30.61 |
| **Information Collection Activity** | Hours | Hours | Hours | Hours | Hours |
| **Refrigerant Management Plan** |  |  |  |  |  |  |  |  |
| Gather information and develop Plan | 1.8 | 0.6 | 0.3 | 0.0 | 0.0 | 2.7 | $140.61 | $0.00 |
| Develop an emission reduction goal for next year | 1.8 | 0.6 | 0.6 | 0.0 | 0.0 | 3.0 | $147.85 | $0.00 |
| Gain corporate approval for Plan | 1.0 | 0.0 | 0.0 | 0.2 | 0.2 | 1.4 | $74.42 | $0.00 |
| Sign and submit the Plan to EPA | 0.2 | 0.0 | 0.1 | 0.0 | 0.0 | 0.3 | $14.04 | $0.00 |
| **SUBTOTAL** |  |  |  |  |  | 7.4 | $376.92 | $0.00 |
| **Annual Report** |  |  |  |  |  |  |  |  |
| Select base year and aggregate information on installed refrigerant and emissions | 1.1 | 0.4 | 0.1 | 0.0 | 0.7 | 2.3 | $106.94 | $0.00 |
| Complete the Annual Report form | 0.7 | 0.1 | 0.3 | 0.0 | 0.0 | 1.1 | $52.72 | $0.00 |
| Sign and submit the Annual Report to EPA | 0.2 | 0.0 | 0.1 | 0.0 | 0.0 | 0.3 | $14.04 | $0.00 |
| **SUBTOTAL** |  |  |  |  |  | 3.7 | $173.70 | $0.00 |
| Total |  |  |  |  |  | 11.1 | $550.61 | $0.00 |

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| --- | --- | --- | --- | --- | --- |
| **Table 3a. Estimated Agency Burden -- New Respondents** | **Hours and Costs per Respondent/Activity** | | | | |
|  | Manager | Technical | Respond. Hrs. / Activity | Labor Costs / Activity | Annual O&M Costs |
|  | $59.30 | $42.66 |
| **Information Collection Activity** | Hours | Hours |
| **Partnership Agreement** |  |  |  |  |  |
| Answer questions from potential Partners | 0.0 | 0.3 | 0.3 | $14.37 | $0.00 |
| Review completed Partnership Agreement, check compliance, record information | 0.0 | 0.3 | 0.3 | $14.37 | $0.00 |
| Sign the Partnership Agreement and return to the Partner | 0.3 | 0.0 | 0.3 | $17.44 | $0.00 |
| **SUBTOTAL** |  |  | 0.9 | $46.18 |  |
| **Refrigerant Management Plan** |  |  |  |  |  |
| Answer questions from Partner on completing a Plan | 0.0 | 0.3 | 0.3 | $14.37 | $0.00 |
| Review the Partner company's Plan | 0.0 | 0.3 | 0.3 | $14.37 | $0.00 |
| Record the emission goal and file the Partner's submission | 0.0 | 0.3 | 0.3 | $14.37 | $0.00 |
| Develop charts based on Partner's goals compared to prior year | 0.0 | 0.3 | 0.3 | $14.37 | $0.00 |
| **SUBTOTAL** |  |  | 1.2 | $57.48 | $0.00 |
| **Annual Report** |  |  |  |  |  |
| Review complete Annual Report | 0.0 | 16.0 | 16.0 | $766.40 | $0.00 |
| Enter data in GreenChill Partner tracking system | 0.0 | 8.0 | 8.0 | $383.20 | $0.00 |
| **SUBTOTAL** |  |  | 24.0 | $1,149.60 | $0.00 |
| Total |  |  | 26.1 | $1,253.26 | $0.00 |

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| --- | --- | --- | --- | --- | --- |
| **Table 3b. Estimated Agency Burden -- Existing Respondents** | **Hours and Costs per Respondent/Activity** | | | | |
|  | Manager | Technical | Respond. Hrs. / Activity | Labor Costs / Activity | Annual O&M Costs |
|  | $59.30 | $42.66 |
| **Information Collection Activity** | Hours | Hours |
| **Partnership Agreement** |  |  |  |  |  |
| Answer questions from potential Partners | 0.0 | 0.0 | 0.0 | $0.00 | $0.00 |
| Review completed Partnership Agreement, check compliance, record information | 0.0 | 0.0 | 0.0 | $0.00 | $0.00 |
| Sign the Partnership Agreement and return to the Partner | 0.0 | 0.0 | 0.0 | $0.00 | $0.00 |
| **SUBTOTAL** |  |  | 0.0 | $0.00 |  |
| **Refrigerant Management Plan** |  |  |  |  |  |
| Answer questions from Partner on completing a Plan | 0.0 | 0.3 | 0.3 | $14.37 | $0.00 |
| Review the Partner company's Plan | 0.0 | 0.3 | 0.3 | $14.37 | $0.00 |
| Record the emission goal and file the Partner's submission | 0.0 | 0.3 | 0.3 | $14.37 | $0.00 |
| Develop charts based on Partner's goals compared to prior year | 0.0 | 0.3 | 0.3 | $14.37 | $0.00 |
| **SUBTOTAL** |  |  | 1.2 | $57.48 | $0.00 |
| **Annual Report** |  |  |  |  |  |
| Review complete Annual Report | 0.0 | 16.0 | 16.0 | $766.40 | $0.00 |
| Enter data in GreenChill Partner tracking system | 0.0 | 8.0 | 8.0 | $383.20 | $0.00 |
| **SUBTOTAL** |  |  | 24.0 | $1,149.60 | $0.00 |
| Total |  |  | 25.2 | $1,207.08 | $0.00 |

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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Table 4. Total Estimated Burden & Cost for Respondents** | Number of Annual New Respondents / Activity | Total Annual Burden for New Respondents Activity | Total Annual Costs for New Respondents / Activity | Average Number of Existing Respondents / Activity | Average Annual Burden for Existing Respondents/ Activity | Average Annual Costs for Existing Respondents / Activity | Average Annual Burden for All Respondents |  |
|  |  |
| **Information Collection Activity** | Average Annual Costs for All Respondents |
| **Partnership Agreement** |  |  |  |  |  |  |  |  |
| Receive and review the Partnership Agreement | 3 | 9.6 | $499.05 | 0 | 0 | 0 | 9.6 | $499.05 |
| Gather information and complete the Partnership Agreement | 3 | 5.7 | $308.51 | 0 | 0 | 0 | 5.7 | $308.51 |
| Sign and submit the Partnership Agreement to EPA | 3 | 1.2 | $39.15 | 0 | 0 | 0 | 1.2 | $39.15 |
| **SUBTOTAL** |  | 16.5 | $846.71 |  |  |  | 16.5 | $846.71 |  |
| **Refrigerant Management Plan** |  |  |  |  |  |  |  |  |
| Gather information and develop Plan | 3 | 11.1 | $569.68 | 48 | 129.6 | $6,749.28 | 140.7 | $7318.96 |
| Develop an emission reduction goal for next year | 3 | 9.3 | $460.98 | 48 | 144 | $7,096.80 | 153.3 | $7557.78 |
| Gain corporate approval for Plan | 3 | 4.2 | $223.27 | 48 | 67.2 | $3,572.16 | 71.4 | $3795.43 |
| Sign and submit the Plan to EPA | 3 | 0.9 | $42.11 | 48 | 14.4 | $673.92 | 15.3 | $716.03 |
| **SUBTOTAL** |  | 25.5 | $1,296.03 |  | 355.2 | $18,092.16 | 380.7 | $19388.20 |
| **Annual Report** |  |  |  |  |  |  |  |  |
| Select base year and aggregate information on installed refrigerant and emissions | 3 | 7.8 | $356.63 | 48 | 110.4 | $5133.12 | 118.2 | $5489.75 |
| Complete the Annual Report form | 3 | 4.2 | $200.27 | 48 | 52.8 | $2530.56 | 57 | $2730.83 |
| Sign and submit the Annual Report to EPA | 3 | 0.9 | $42.11 | 48 | 14.4 | $673.92 | 15.3 | $716.03 |
| **SUBTOTAL** |  | 12.9 | $599.01 |  | 177.6 | $$8337.60 | 190.5 | $8936.61 |
| Total |  | 54.9 | $2,741.75 |  | 532.8 | $26,439.76 | 587.7 | $29171.52 |

**Table 5. Estimated Burden and Cost for a Store Certification Application**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Hours** | **Hours** | **Hours** | **Hours Total** | **Labor Costs** | **O&M Costs** |  |  |
|  | Manager | Technical | Clerical |  |  |  |  |  |
|  | $58.13 | $47.90 | $24.12 |  |  |  |  |  |
| **Respondent Information Collection Activity** |  |  |  |  |  |  |  |  |
| Review instructions and obtain appropriate application form | 0.2 | 0.5 | 0.5 | 1.2 | $47 | $0 |  |  |
| Gather information, verifications, and appropriate documents | 1.0 | 5.0 | 1.5 | 7.5 | $334 | $0 |  |  |
| Complete the application form | 0.1 | 0.2 | 1.5 | 1.8 | $52 | $0 |  |  |
| Send the application form and associated documents | 0.0 | 0.0 | 0.5 | 0.5 | $12 | $0 |  |  |
| SUBTOTALS | 1.3 | 5.7 | 4.0 | 11.0 | $445 | $0 |  |  |
|  |  |  |  |  |  |  |  |  |
|  | **Hours** | **Hours** | **Hours Total** | **Labor Costs** | **O&M Costs** |  |  |  |
|  | Manager | Technical |  |  |  |  |  |  |
|  | $59.30 | $42.66 |  |  |  |  |  |  |
| **Agency Information Collection Activity** |  |  |  |  |  |  |  |  |
| Receive and acknowledge application | 0.0 | 0.2 | 0.2 | $8 | $0 |  |  |  |
| Review for completeness & accuracy, contact if necessary | 0.0 | 0.5 | 0.5 | $21 | $0 |  |  |  |
| Review in relation to criteria | 0.0 | 4.0 | 4.0 | $171 | $0 |  |  |  |
| Send communication about certification | 0.1 | 0.2 | 0.3 | $15 | $0 |  |  |  |
| SUBTOTALS | 0.1 | 3.8 | 5.0 | $215 | $0 |  |  |  |
|  |  |  |  |  |  |  |  |  |