

**INFORMATION COLLECTION REQUEST  
SUPPORTING STATEMENT  
U.S. ENVIRONMENTAL PROTECTION AGENCY  
STRATOSPHERIC OZONE PROTECTION**

**1. IDENTIFICATION OF THE INFORMATION COLLECTION**

**1(a) Title and Number of the Information Collection Request**

This Information Collection Request (ICR) is entitled “National Recycling and Emissions Reduction Program,” ICR number 1626.12, OMB Control Number 2060-0256.

**1(b) Short Characterization**

The EPA developed regulations under the Clean Air Act Amendments of 1990 (CAAA) establishing standards and requirements regarding the use and disposal of Class I and Class II refrigerants during the service, maintenance, repair, or disposal of refrigeration and air-conditioning equipment. Section 608(c) of the CAAA states that effective July 1, 1992, it is unlawful for any person in the course of maintaining, servicing, repairing, or disposing of refrigeration or air-conditioning equipment to knowingly vent or otherwise knowingly release or dispose of any Class I or Class II substance used as a refrigerant in the equipment in a manner that permits the substance to enter the environment.

In 1993, EPA promulgated regulations under Section 608 of the CAAA, codified in 40 CFR Part 82 Subpart F (§82.156), pertaining to leaks of ozone-depleting refrigerants from air-conditioning and refrigeration equipment containing more than 50 pounds of refrigerants that are ozone-depleting substances (ODS). These regulations require that substantial refrigerant leaks in equipment be repaired when they are discovered, and therefore these regulations significantly reduce emissions of ozone-depleting refrigerants. EPA modified these regulations in to revise the trigger rates at which leaks have to be repaired and to modify some of the required practices.

To facilitate compliance with, and enforcement of, Section 608 requirements, EPA requires owners and operators of refrigeration and air-conditioning appliances with a full charge greater than 50 pounds, as well as service technicians for the affected appliances, to maintain certain records (codified in 40 CFR §82.156) concerning appliance repairs, retrofits, and retirements. The affected appliances are used for commercial refrigeration, industrial process refrigeration, and comfort cooling. The required recordkeeping is done on an occasional basis, depending on the identification of leaks and the number of steps it takes to complete leak repairs when complying with the requirements outlined in §82.156.

Recordkeeping requirements for affected entities consist of the following:

- } Owners and operators need to maintain:
  - ú Service records and retrofit/retirement plans of affected appliances
  - ú Justifications for delays in completing repairs and retrofits plans

- ú Information on the full charge of refrigerants for appliances
  - ú Purchase and transfer of refrigerants
- } Service technicians need to maintain:
  - ú Information on refrigerant removed and not returned to appliances.

These regulations affect service technicians and the owners and operators of comfort cooling, commercial refrigeration, and industrial process refrigeration appliances that contain a full charge of refrigerant greater than 50 pounds. EPA estimates there are up to 267,554 respondents, consisting of 133,777 service technicians and 133,777 owners or operators of appliances that have greater than a 50 pound charge requiring repair. This represents a high estimate accounting for a unique owner and service technician for each appliance requiring a repair. It is likely that a service technician services more than one affected appliance and that multiple affected appliances are owned or operated by the same respondent. The estimated total annual burden for maintenance of records for these respondents is 6,182 hours at an annual cost of \$148,365.

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

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

To facilitate compliance with, and enforcement of, the Section 608 requirements of the CAAA, EPA established recordkeeping requirements for technicians and owners or operators of commercial refrigeration, comfort cooling, and industrial process refrigeration appliances with a charge size exceeding 50 pounds. Specific recordkeeping requirements were codified under 40 CFR subpart F (§82.166).

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

The purpose and need of this collection request is to facilitate compliance with, and enforcement of, Section 608 of the CAAA by reducing emissions of Class I and Class II ODS refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of affected appliances. As a part of compliance verification and enforcement activities, EPA has used, and will continue to use, these records as necessary to ensure that all refrigerant leaks are satisfactorily repaired.

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

### **3(a) Nonduplication**

The information to be maintained under this ICR is not collected by any other EPA program or federal agency. The information is not available from other sources because it is proprietary information maintained by industry sources.

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

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice as part of the preamble to the proposed rule.

### **3(c) Consultations**

Judgments of industry experts in the air-conditioning and refrigeration sector were obtained during the development of the regulatory impact analysis of the regulations revising the trigger rates requiring repair of leaks in equipment with charge sizes greater than 50 pounds. Industry experts were also contacted to obtain information on practices related to adding and removing refrigerants to account for seasonal variance.

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

This rule does not require submission of records to EPA. Instead, this rule requires the maintenance of records by owners or operators of commercial, comfort cooling, and industrial process refrigeration equipment with charges greater than 50 pounds and by technicians servicing the equipment. The number of records requiring maintenance depends on the frequency of leaks and equipment replacement as well as the success of fixing leaks in affected comfort cooling, commercial refrigeration, and industrial process refrigeration appliances. Maintenance of these records is instrumental in ensuring compliance with the regulations concerning repair activities and verification tests, along with documenting the location and extent of appliance leaks, retrofit and repair activities, and any time extensions needed for repairs. Therefore, less frequent collection is not possible because maintenance of records is intended to document efforts to repair leaks in refrigeration and air-conditioning equipment.

### **3(e) General Guidelines**

This ICR adheres to the guidelines stated in the Paperwork Reduction Act of 1995, OMB's implementing regulations, OMB's Information Collection Review Handbook, and other applicable OMB guidance.

### **3(f) Confidentiality**

The information maintained under this ICR renewal is used to facilitate compliance with, and enforcement of, Section 608 of the CAAA. The revised regulations require the maintenance of information by respondents; the information is not routinely collected or managed by EPA. The records required to be maintained are not shared with parties outside of the federal government. EPA's confidentiality regulations (40 CFR 2.201 et seq.) assure computer data security, disclosure prevention, proper handling, proper storage, and proper disposal of all information obtained by EPA as part of compliance verification and enforcement activities.

### 3(g) Sensitive Questions

This ICR renewal does not ask questions of a sensitive nature. The required records pertain only to service and repair of refrigerant leaks and do not contain any information concerning sexuality, religious beliefs, or other matters usually considered private.

## 4. THE RESPONDENTS AND THE INFORMATION REQUESTED

### 4(a) Respondents and North American Industrial Classification System Codes

Table 1 is a list of North American Industrial Classification System (NAICS) codes potentially affected by the information requirements covered under this ICR.

**Table 1. Affected business sectors and NAICS codes**

<b>Business sector</b>	<b>NAICS code</b>
Supermarkets and grocery stores	445110
Convenience stores	445120
Gas station convenience stores	447110
Warehouse and club supercenters	45291
Refrigerated warehouse and storage	49312
Refrigerated warehouse farm product storage	49313
Office building managers	531312
Lodging	72
Chemical manufacturing	325
Pharmaceutical manufacturing	3254
Petrochemical manufacturing	324110
Bakeries	3118
Food manufacturing other than bakeries	311
Breweries	31212
Soft drink manufacturing	312111
Bottled water manufacturing	312112
Ice manufacturing	312113
Ice rinks	713940

**Table 1. Affected business sectors and NAICS codes (cont.)**

<b>Business sector</b>	<b>NAICS code</b>
Elementary and secondary schools	6111
Junior colleges, colleges, and universities	6112, 6113
Hospitals	622
Commercial industrial machinery and equipment (not automotive and electronic) repair and maintenance	81131
Plumbing, heating, air conditioning contractors	238220

### 4(b) Information Requested

(i) *Data Items – Recordkeeping Requirements*

All records pursuant to this ICR must be kept onsite at the respondent’s place of business for a minimum of 3 years. Records are required in accordance with 40 CFR §82.166.

**Recordkeeping**

Information must be maintained by respondents in the following situations:

- } **Repairing appliances:** Information on the quantity and type of refrigerant added to the appliance; the identity and location of the appliance; the date and type of service performed; the physical location of any leaks; the amount and type of refrigerant recovered from the appliance; the date, method, and results of initial verification and follow-up verification tests; the full charge of the appliance; the calculated leak rate of the appliance; and the type and quantity of refrigerant purchased to be maintained by the owner or operator of the appliance.
- } **Retrofitting or retiring appliances:** Information on identification and location of the appliance; type and full charge of the refrigerant used by the leaking appliance; location of all leaks and efforts taken to address leaks before retrofit or retirement; type and full charge of the substitute to which the appliance will be converted, if retrofitted; itemized procedure for retrofit including, but not limited to, the procedure for flushing old refrigerant and lubricant, changes in lubricants, filters, gaskets, o-rings, or valves; the plan for the disposition of recovered refrigerant; the plan for the disposition of the appliance, if retired; and a 6-month schedule for the complete retrofit or retirement of the appliance to be maintained by the owner or operator of the appliance.
- } **Transferring refrigerant recovered from appliances to a different owner:** Information on types and amounts of refrigerant, name and address of the facility accepting used refrigerant, and the date that the refrigerant was transferred to be maintained by the owner or operator of the appliance.
- } **In the event of being unable to complete repairs in 30 days due to radiological conditions or unavailability of components:** A written statement describing the radiological conditions that prevent immediate repair of the appliance; or a written statement from the appliance or component manufacturer or distributor estimating a date of delivery for parts required to complete repairs of the appliance to be maintained by the owner or operator of the appliance.
- } **In the event of being unable to complete retrofit plans within 6 month, due to the unavailability of one or more of the appliance’s components that have a quoted delivery time of more than 12 weeks:** A written statement from the appliance or component manufacturer or distributor estimating a date of delivery for parts required to complete the retrofit plan; and documentation on the actual date of delivery of the appliance component to be maintained by the owner or operator of the appliance.

- } **Determining full charge:** Appliance or appliance component data, measurements, calculations and assumptions used to determine the full charge, as defined at §82.152, to be maintained by the owner or operator of the appliance.
- } **Seeking an exemption from the requirement to calculate the leak rate upon each addition of refrigerant, as specified in §82.152, due to a seasonal variance:** Information on the amount and type of refrigerant and the date that the refrigerant was added to the appliance and the date that refrigerant was removed from the appliance to counter the seasonal adjustment to be maintained by the owner or operator of the appliance.
- } **During service, repair, and maintenance of appliances:** Information on the amount and type of refrigerant recovered, but not returned to the appliance, if any, to be maintained by the service technician.

***Respondent Activities***

Service technicians and owners/operators of equipment are required to maintain records for a minimum of 3 years.

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

The revised regulations require the maintenance of information by respondents. However, the information is not collected or managed by EPA. No agency burden is incurred under these revised regulations.

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

**6(a) Estimating Respondent Burden**

EPA estimated the reporting burden associated with revising the trigger rates for leak repairs using information on the number of appliances requiring services, the rate of successful repairs from the regulatory impact analysis conducted for the revised regulations, input from industry experts on seasonal variance, and time estimates for maintaining records from the previous ICR developed in 2007 for the emissions reductions program.<sup>1</sup>

Table 2 shows the type and number of appliances affected by revised trigger rates for leak repair by sector. This information was obtained during the development of the regulatory impact analysis. The revised rule requires owners or operators to conduct an initial verification test immediately upon completion of repairs, and a follow-up verification test within 30 days of completing the repair (but no sooner than 24 hours after the repair and recharge of the appliance). If the initial or follow-up verification test indicates that the repairs have not been

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<sup>1</sup> EPA ICR No. 1626.10, OMB Control No. 2060–0256.

successful, the owner or operator must make second repair attempt within 30 days of the first failed verification, and must conduct an initial and a follow-up verification test on the second repair. If the second verification again indicates the repair was not successful, the owner or operator must conduct a third repair with an initial and a follow-up verification test. An affected appliance that has experienced three failed verification tests within a consecutive six-month period must be retired or retrofitted to use a refrigerant (or substitute) with a lower ozone depleting potential (ODP).

For this analysis, it is assumed that after the final verification test in each of the three repair cycles, the service technicians would provide a detailed invoice containing all the information required under the rule to be kept as a record. Therefore, a successful first repair would result in one repair invoice, a successful second repair would result in two repair invoices (one for the failed first repair and one for the successful second repair), and a successful third repair would result in three repair invoices (two for the failed repairs and one for the successful repair). A retrofit or replacement would result in three repair records (one for each of the three failed repairs). The final column of Table 2 indicates the number of successful repairs at each stage (first, second, or third successful repairs plus the retrofit/replacement after three failed repairs). The number of invoices shown in final column of Table 2 is equal to the number of records that must be filed and subsequently maintained for three years.

The annual number of events where records have to be maintained is described below:

- } **Repairing appliances:** The total annual number of invoices with the required information is 163,208, as shown in Table 2. Based on the previous ICR, EPA estimates that it typically takes 2 minutes to file and maintain the paperwork.
- } **Retrofitting or retiring appliances:** The total annual number of retrofits or retirement is 134, as shown in Table 2. Based on the previous ICR, EPA estimates that it typically takes 2 minutes to file and maintain the paperwork.

**Table 2. Appliances requiring repair, number of successful repairs at each stage, and the total number of invoices to be filed and maintained**

<b>Sector</b>	<b>System type</b>	<b>Total no. of appliances</b>	<b>No. of appliances requiring repair</b>	<b>No. of successful first repairs</b>	<b>No. of successful second repairs</b>	<b>No. of successful third repairs</b>	<b>No. of retrofits or retirement</b>	<b>No. of invoices with required information</b>
Supermarkets and grocery stores	Commercial	262,887	61,516	49,212	11,073	1,169	62	75,049
	Comfort cooling	62,934	8,169	6,535	1,470	155	8	9,966
	Industrial	0	0	0	0	0	0	0
<b>Totals</b>		<b>325,821</b>	<b>69,684</b>	<b>55,748</b>	<b>12,543</b>	<b>1,324</b>	<b>70</b>	<b>85,015</b>
Convenience stores	Commercial	0	0	0	0	0	0	0
	Comfort cooling	2,054	267	213	48	5	0	325
	Industrial	0	0	0	0	0	0	0
<b>Totals</b>		<b>2,054</b>	<b>267</b>	<b>213</b>	<b>48</b>	<b>5</b>	<b>0</b>	<b>325</b>
Gas station convenience stores	Commercial	0	0	0	0	0	0	0
	Comfort cooling	5,082	660	528	119	13	1	805
	Industrial	0	0	0	0	0	0	0
<b>Totals</b>		<b>5,082</b>	<b>660</b>	<b>528</b>	<b>119</b>	<b>13</b>	<b>1</b>	<b>805</b>
Warehouse and club supercenters	Commercial	8,964	2,098	1,678	378	40	2	2,559
	Comfort cooling	4,482	582	465	105	11	1	710
	Industrial	0	0	0	0	0	0	0
<b>Totals</b>		<b>13,446</b>	<b>2,679</b>	<b>2,143</b>	<b>482</b>	<b>51</b>	<b>3</b>	<b>3,269</b>
Refrigerated warehouse and storage	Commercial	3,880	908	726	163	17	1	1,108
	Comfort cooling	1,940	252	201	45	5	0	307
	Industrial	0	0	0	0	0	0	0
<b>Totals</b>		<b>5,820</b>	<b>1,160</b>	<b>928</b>	<b>209</b>	<b>22</b>	<b>1</b>	<b>1,415</b>
Refrigerated warehouse farm product storage	Commercial	2,156	505	404	91	10	1	615
	Comfort cooling	1,078	140	112	25	3	0	171
	Industrial	0	0	0	0	0	0	0
<b>Totals</b>		<b>3,234</b>	<b>644</b>	<b>516</b>	<b>116</b>	<b>12</b>	<b>1</b>	<b>786</b>



**Table 2. Appliances requiring repair, number of successful repairs at each stage, and the total number of invoices to be filed and maintained (cont.)**

<b>Sector</b>	<b>System type</b>	<b>Total no. of appliances</b>	<b>No. of appliances requiring repair</b>	<b>No. of successful first repairs</b>	<b>No. of successful second repairs</b>	<b>No. of successful third repairs</b>	<b>No. of retrofits or retirement</b>	<b>No. of invoices with required information</b>
Office building managers	Commercial	0	0	0	0	0	0	0
	Comfort cooling	714	93	74	17	2	0	113
	Industrial	0	0	0	0	0	0	0
<b>Totals</b>		714	93	74	17	2	0	113
Lodging	Commercial	0	0	0	0	0	0	0
	Comfort cooling	67,818	8,803	7,042	1,584	167	9	10,739
	Industrial	0	0	0	0	0	0	0
<b>Totals</b>		67,818	8,803	7,042	1,584	167	9	10,739
Chemical manufacturing	Commercial	0	0	0	0	0	0	0
	Comfort cooling	45,268	5,876	4,701	1,058	112	6	7,168
	Industrial	45,268	10,113	8,090	1,820	192	10	12,338
<b>Totals</b>		90,536	15,989	12,791	2,878	304	16	19,506
Pharmaceutical manufacturing	Commercial	0	0	0	0	0	0	0
	Comfort cooling	7,116	924	739	166	18	1	1,127
	Industrial	7,116	1,590	1,272	286	30	2	1,939
<b>Totals</b>		14,232	2,513	2,011	452	48	3	3,066
Petrochemical manufacturing	Commercial	0	0	0	0	0	0	0
	Comfort cooling	1,396	181	145	33	3	0	221
	Industrial	1,396	312	249	56	6	0	380
<b>Totals</b>		2,792	493	394	89	9	0	602
Bakeries	Commercial	0	0	0	0	0	0	0
	Comfort cooling	21,068	2,735	2,188	492	52	3	3,336
	Industrial	21,068	4,707	3,765	847	89	5	5,742
<b>Totals</b>		42,136	7,441	5,953	1,339	141	7	9,078

**Table 2. Appliances requiring repair, number of successful repairs at each stage, and the total number of invoices to be filed and maintained (cont.)**

<b>Sector</b>	<b>System type</b>	<b>Total no. of appliances</b>	<b>No. of appliances requiring repair</b>	<b>No. of successful first repairs</b>	<b>No. of successful second repairs</b>	<b>No. of successful third repairs</b>	<b>No. of retrofits or retirement</b>	<b>No. of invoices with required information</b>
Food manufacturing other than bakeries	Commercial	0	0	0	0	0	0	0
	Comfort cooling	30,328	3,937	3,149	709	75	4	4,803
	Industrial	30,328	6,775	5,420	1,220	129	7	8,266
<b>Totals</b>		<b>60,656</b>	<b>10,712</b>	<b>8,569</b>	<b>1,928</b>	<b>204</b>	<b>11</b>	<b>13,068</b>
Breweries	Commercial	0	0	0	0	0	0	0
	Comfort cooling	1,784	232	185	42	4	0	283
	Industrial	1,784	399	319	72	8	0	486
<b>Totals</b>		<b>3,568</b>	<b>630</b>	<b>504</b>	<b>113</b>	<b>12</b>	<b>1</b>	<b>769</b>
Soft drink manufacturing	Commercial	0	0	0	0	0	0	0
	Comfort cooling	2,204	286	229	51	5	0	349
	Industrial	2,204	492	394	89	9	0	601
<b>Totals</b>		<b>4,408</b>	<b>778</b>	<b>623</b>	<b>140</b>	<b>15</b>	<b>1</b>	<b>950</b>
Bottled water	Commercial	0	0	0	0	0	0	0
	Comfort cooling	1,140	148	118	27	3	0	181
	Industrial	1,140	255	204	46	5	0	311
<b>Totals</b>		<b>2,280</b>	<b>403</b>	<b>322</b>	<b>72</b>	<b>8</b>	<b>0</b>	<b>491</b>
Ice manufacturing	Commercial	0	0	0	0	0	0	0
	Comfort cooling	1,464	190	152	34	4	0	232
	Industrial	1,464	327	262	59	6	0	399
<b>Totals</b>		<b>2,928</b>	<b>517</b>	<b>414</b>	<b>93</b>	<b>10</b>	<b>1</b>	<b>631</b>
Ice rinks	Commercial	0	0	0	0	0	0	0
	Comfort cooling	450	58	47	11	1	0	71
	Industrial	899	201	161	36	4	0	245
<b>Totals</b>		<b>1,349</b>	<b>259</b>	<b>207</b>	<b>47</b>	<b>5</b>	<b>0</b>	<b>316</b>

**Table 2. Appliances requiring repair, number of successful repairs at each stage, and the total number of invoices to be filed and maintained (cont.)**

<b>Sector</b>	<b>System type</b>	<b>Total no. of appliances</b>	<b>No. of appliances requiring repair</b>	<b>No. of successful first repairs</b>	<b>No. of successful second repairs</b>	<b>No. of successful third repairs</b>	<b>No. of retrofits or retirement</b>	<b>No. of invoices with required information</b>
Elementary and secondary schools	Commercial	0	0	0	0	0	0	0
	Comfort cooling	2,507	325	260	59	6	0	397
	Industrial	0	0	0	0	0	0	0
<b>Totals</b>		<b>2,507</b>	<b>325</b>	<b>260</b>	<b>59</b>	<b>6</b>	<b>0</b>	<b>397</b>
Junior colleges, colleges, and universities	Commercial	0	0	0	0	0	0	0
	Comfort cooling	517	67	54	12	1	0	82
	Industrial	0	0	0	0	0	0	0
<b>Totals</b>		<b>517</b>	<b>67</b>	<b>54</b>	<b>12</b>	<b>1</b>	<b>0</b>	<b>82</b>
Hospitals	Commercial	0	0	0	0	0	0	0
	Comfort cooling	1,817	236	189	42	4	0	288
	Industrial	0	0	0	0	0	0	0
<b>Totals</b>		<b>1,817</b>	<b>236</b>	<b>189</b>	<b>42</b>	<b>4</b>	<b>0</b>	<b>288</b>
Others not included above	Commercial	0	0	0	0	0	0	0
	Comfort cooling	72,600	9,423	7,539	1,696	179	9	11,497
	Industrial	0	0	0	0	0	0	0
<b>Totals</b>		<b>72,600</b>	<b>9,423</b>	<b>7,539</b>	<b>1,696</b>	<b>179</b>	<b>9</b>	<b>11,497</b>
<b>Grand total</b>		<b>726,314</b>	<b>133,777</b>	<b>107,022</b>	<b>24,080</b>	<b>2,542</b>	<b>134</b>	<b>163,208</b>

- } **Transferring refrigerant recovered from appliances to a different owner:** EPA assumes that refrigerant transfer typically happens at the time of retrofits and replacements. Hence the total number of annual events is 134. Based on the previous ICR, EPA estimates that it typically takes 2 minutes to file and maintain the paperwork.
- } **Being unable to complete repairs in 30 days due to radiological conditions or unavailability of components:** Based on past experience, EPA estimates that there will be 3 instances in 10 years where radiological conditions prevent immediate repair of an appliance and 10 instances per year where unavailability of components prevent immediate repair of an appliance. EPA also estimates that it would take 4 minutes per event to develop a statement describing the situation and filing and maintaining the paperwork.
- } **Being unable to complete retrofit plans within 6 months due to the unavailability of one or more of the appliance's components that have a quoted delivery time of more than 12 weeks:** EPA estimates that about 3% of planned retrofits will face a delay in planned completion due to unavailability of components. EPA also estimates that it would take 4 minutes per event to develop a statement describing the situation and filing and maintaining the paperwork.
- } **Determining full charge:** EPA assumes that information about the full charge capacity of all affected appliances would be provided by the equipment vendor and filed along with the paperwork associated with the equipment. In the case of retrofits, new information on the full charge needs to be filed and maintained. The number of retrofits is 134, as shown in Table 2. This is an overestimate because some equipment might be replaced. Based on the previous ICR, EPA estimates that it typically takes 2 minutes to file and maintain the paperwork.
- } **Seeking an exemption from the requirement to calculate the leak rate upon each addition of refrigerant, as specified in §82.152, due to a seasonal variance:** Input was sought from industry experts on the frequency of adding (in winter) or removing (in summer) refrigerant due to seasonal variance. Industry input indicated that it was a rare event and affected only commercial refrigeration equipment. EPA assumed that a maximum of 2% of all commercial equipment considered in this study would face this situation. As a result, 5,558 pieces of equipment are affected (this is likely an overestimate). EPA assumes that it would take 2 minutes to file and maintain the paper work on addition of refrigerant in the winter and 2 minutes to do the same on removing in summer, resulting in 4 minutes per event.
- } **Recovering but not returning refrigerant to an appliance:** EPA assumes that about 10% of first repairs might have recovered refrigerant not returned to the appliance, which results in 10,702

events annually. Based on the previous ICR, EPA estimates that it typically takes service technicians 2 minutes to file and maintain the paperwork.

Table 3 shows the number of events, the associated burden per event, and the total burden associated with this rule. The total burden is 6,182 hours.

**Table 3. Number of events, the associated burden per event, and the total burden.**

<b>Type of event</b>	<b>No. of filing and maintenance activities</b>	<b>Burden per filing and maintenance activity (hours)</b>	<b>Total burden per event (hours)</b>
Repairing appliances	163,208	0.033	5,440.27
Retrofitting or retiring appliances	134	0.333	4.46
Transferring refrigerant recovered from appliances to a different owner	134	0.333	4.46
Unable to complete repairs in 30 days due to radiological contamination or unavailability of components	10.3	0.067	0.69
Unable to complete retrofit plans within 6 months due unavailability of components	4	0.067	0.27
Determining full charge	134	0.333	4.46
Adding and removing refrigerant due to seasonal variance	5,558	0.067	370.52
Recovering but not returning refrigerant to an appliance	10,702	0.033	356.74
<b>Total burden</b>			<b>6,181.87</b>

## 6(b) Estimating Respondent Costs

Filing and maintaining paperwork associated with the events described in Sections 4b and 6a is typically done by office and administrative support staff. The labor rates used to determine the estimated costs to respondents are based on the hourly wage rates published by the Bureau of Labor Statistics publications on employment and earnings for office and administrative support staff, plus an allowance for fringe benefits and overhead. The mean wage rate for office and administrative support staff in 2007 was \$15.00/hour,<sup>2</sup> and EPA estimated an average respondent hourly labor rate (including a multiplier of 1.6 for fringe benefits) of \$24.00/hour.

Table 4 shows the burden hours associated with each event and the total cost associated with each event. The total cost to respondents is \$148,365.

<sup>2</sup>. BLS. 2008. Occupational Employment and Wages, May 2007 – 43-0000 Office and Administrative Support Occupations (Major Group). Bureau of Labor Statistics. Available: <http://www.bls.gov/oes/2007/may/oes430000.htm>. Accessed 10/20/09.

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

No agency burden or associated costs are with this rule.

**Table 4. Total burden and cost**

Type of event	Total burden per event (hours)	Total cost per event (\$) <sup>a</sup>
Repairing appliances	5,440.27	130,566.39
Retrofitting or retiring appliances	4.46	107.02
Transferring refrigerant recovered from appliances to a different owner	4.46	107.02
Unable to complete repairs in 30 days due to radiological contamination or unavailability of components	0.69	16.56
Unable to complete retrofit plans within 6 months due unavailability of components	0.27	6.45
Determining full charge	4.46	107.02
Adding and removing refrigerant due to seasonal variance	370.52	8,892.38
Recovering but not returning refrigerant to an appliance	356.74	8,561.73
<b>Total burden</b>	<b>6,181.87</b>	<b>148,364.58</b>

a. Based on labor rate of \$24.00 per hour.

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

The universe of respondents has been estimated by EPA as 267,554 respondents, consisting of 133,777 service technicians and 133,777 owners or operators of appliances that have greater than a 50 pound charge requiring repair. This represents a high estimate accounting for a unique owner and service technician for each appliance requiring a repair. The total burden is 6,182 hours at a cost of \$148,365 per year.

### 6(e) Bottom Line Burden Hours and Costs Tables

The bottom line burden is 6,182 hours at a cost of \$148,365 per year and 18,546 hours and \$445,094 over a 3 year period borne by owners or operators of refrigeration and air conditioning appliances with a charge size greater than 50 pounds.

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

There is a change in burden due to a change in the trigger rates for leak repair and required practices according to the proposed regulation.

## **6(g) Burden Statement**

The annual burden is 6,182 hours. 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 forms; 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 1.

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-2003-0167, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov) or in-person viewing at the Air Docket in the EPA Docket Center (EPA/DC), EPA West Room 3334, 1301 Constitution Avenue, NW, Washington, DC. The EPA/DC 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 Docket is (202) 566-1742. An electronic version of the public docket is available at [www.regulations.gov](http://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 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, comments can be sent to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2003-0167 and OMB Control Number 2060-0256 in any correspondence.