

National Refrigerant Recycling and Emissions Reduction Program, EPA ICR Number: 1626.12, OMB Control Number: 2060-0256

Annual Respondent Burden and Cost

The following tables illustrate the calculations performed to calculate the annual respondent burden and cost for the National Refrigerant Recycling and Emissions Reduction Program.

Assumptions

Average Administrative Cost (Labor + Overhead)	\$44.31	EPA used the median hourly earnings of \$21.10 for heating, air-conditioning, and refrigeration mechanics and installers from the Bureau of Labor Statistics (http://www.bls.gov/oes/current/oes499021.htm). EPA then multiplied this number by 110% for overhead (\$21.10 x 1.10 = \$23.21).
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Respondent Tally

Reporting

Activity	Number of Respondents	Number of Responses per Respondent	Burden Hours (Time) per Response	All Respondents			Per Respondent		Respondent
				Annual Burden Hours	Annual Labor Costs	Number of Annual Responses	Annual Burden Hours	Annual Labor Cost	
Refrigerant Recovery/ Recycling Equipment Testing Organizations - Submit reports on approved equipment (including new model lines and failed retests/inspections)	2	1	4.00	8.00	\$354.48	2	4.00	\$177.24	Refrigerant Recovery/ Recycling Equipment Testing Organization
Certification by Owners of Refrigerant Recovery/ Recycling Equipment (or Service Established) that Change Ownership or Enter the Market Compile information, complete certification requirements	2,250	1	1.00	2,250.00	\$99,697.50	2,250	1.00	\$44.31	Service Establishments
Certification by Disposal Establishments that change Ownership or Enter the Market	375	1	1.00	375.00	\$16,616.25	375	1.00	\$44.31	Disposal Establishments
Certification by Refrigerant Reclaimers that Change Ownership or Enter the Market	4	1	5.00	20.00	\$886.20	4	5.00	\$221.55	Refrigerant Reclaimers
Reclaimer Annual Activity Report	60	1	5.00	300.00	\$13,293.00	60	5.00	\$221.55	Refrigerant Reclaimers
Technician Certification Programs Applying for Approval	5	1	5.00	25.00	\$1,107.75	5	5.00	\$221.55	Technician Certification Programs
Biannual Reporting by Existing Technician Certification Programs	91	2	1.00	182.00	\$8,064.42	182	2.00	\$88.62	Technician Certification Programs
Owners/operators of appliances w/charge sizes >50 lbs prepare & submit requests for extensions to 30-day repair timeline	15	1	0.50	7.50	\$332.33	15	0.50	\$22.16	Owners
Owners/operators of appliances w/charge sizes >50 lbs prepare & submit requests for extensions to 1 yr retrofit/retire timeline	5	1	0.50	2.50	\$110.78	5	0.50	\$22.16	Owners
SUBTOTAL	2,807	varies	varies	3,170.00	\$140,462.70	2,898	varies	varies	

Recordkeeping

Activity	Number of Respondents	Number of Responses per Respondent	Burden Hours (Time) per Response	All Respondents			Per Respondent		Respondent
				Annual Burden Hours	Annual Labor Costs	Number of Annual Responses	Annual Burden Hours	Annual Labor Cost	
Refrigerant Recovery/ Recycling Equipment Testing Organizations - Maintain records of refrigerant recovery/recycling equipment tested and its performance	2	1	0.125	0.25	\$11.08	2	0.125	\$5.54	Refrigerant Recovery/ Recycling Equipment Testing Organization
Maintenance of copies of signed statements of previous refrigerant recovery by disposal establishments	7,500	260	0.050	97,500.00	\$4,320,225.00	1,950,000	13	\$576.03	Disposal Establishments
Reclaimer recordkeeping	60	50	0.125	375.00	\$16,616.25	3,000	6.25	\$276.94	Refrigerant Reclaimers

Refrigerant wholesalers recordkeeping for refrigerant sales, including maintenance of technician certification cards from purchasers employing at least one certified technician	200,000	25	0.033	165,000	\$7,311,150.00	5,000,000	0.825	\$36.56	Refrigerant Wholesalers
Record keeping by Existing Technician Certification Programs	91	1	5.000	455.00	\$20,161.05	91	5	\$221.55	Technician Certification Programs
Technicians Acquiring Certification Cards	30,000	1	0.017	501.00	\$22,199.31	30,000	0.0167	\$0.74	Technicians
Technicians Maintaining Certification Cards	300,000	1	0.017	5,010.00	\$221,993.10	300,000	0.0167	\$0.74	Technicians
Persons servicing appliances w/charge sizes >50 lbs provide invoices to appliance owners/operators	20,500	1	0.025	512.50	\$22,708.88	20,500	0.025	\$1.11	Technicians
Owners/operators of appliances w/charge sizes >50 lbs maintain purchase and service records	20,500	1	0.025	512.50	\$22,708.88	20,500	0.025	\$1.11	Owners
Owners/operators of appliances w/charge sizes >50 lbs - Maintain information on purged/destroyed refrigerant	2	1	0.025	0.05	\$2.22	2	0.025	\$1.11	Owners
Owners/operators of appliances w/charge sizes >50 lbs - Develop/Maintain plan to retire/replace or retrofit equipment, as applicable	5,000	1	8.000	40,000.00	\$1,772,400.00	5,000	8	\$354.48	Owners
Owners/operators of appliances w/charge sizes >50 lbs - Maintain information on the calculation of the full charge using a range, as applicable	200,000	1	0.025	5,000.00	\$221,550.00	200,000	0.025	\$1.11	Owners
Owners/operators of appliances w/charge sizes >50 lbs - Maintain reports on the results of verification tests (IPR and in limited instances federally owned equipment)	100,025	1	0.025	2,500.63	\$110,802.69	100,025	0.025	\$1.11	Owners
SUBTOTAL	883,680	varies	varies	317,367	\$14,062,528.45	7,629,120	varies	varies	

Total Number of Respondents	Total Number of Annual Responses	Total Annual Hour Burden	Total Annual Labor Costs
883,680	7,632,018	320,537	\$14,202,991

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Annual Agency Burden and Cost

The following table illustrates the calculations performed to calculate the annual agency burden and cost for the National Refrigerant Recycling and Emissions Reduction Program.

Assumptions

Agency Burden Cost	\$32.18	The hourly rate for EPA staff at the GS-9 Step 1 level is \$20.11 per hour (see the GS salary schedule at http://www.opm.gov/oca). EPA then multiplied the hourly rate by the standard government benefits and overhead multiplication factor of 1.6 to estimate the annual Agency burden and cost (\$20.11 x 1.6).
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Agency Tally

Reviewing and Responding

Activity	Number of Respondents	Number of Responses per Respondent	Agency Burden Hours (Time) to Review each Response	Total Annual Agency Hours	Total Agency Labor Costs
and failed retests/inspections)	2	1	0.5	1.0	\$32.18
Certification by Owners of Refrigerant Recovery/ Recycling Equipment (or Service Established) that Change Ownership or Enter the Market Compile information, complete certification requirements	2,250	1	0.25	562.5	\$18,099.00
Certification by Disposal Establishments that change Ownership or Enter the Market	375	1	0.25	93.75	\$3,016.50
Certification by Refrigerant Reclaimers that Change Ownership or Enter the Market	4	1	1.0	4.0	\$128.70
Reclaimer Annual Activity Report	60	1	1.0	60.0	\$1,930.56
Technician Certification Programs Applying for Approval	5	1	2.0	10.0	\$321.76
Biannual Reporting by Existing Technician Certification Programs	91	2	1.0	182.0	\$5,856.03
Owners/operators of appliances w/charge sizes >50 lbs prepare & submit requests for extensions to 30-day repair timeline	15	1	0.5	7.5	\$241.32
Owners/operators of appliances w/charge sizes >50 lbs prepare & submit requests for extensions to 1 yr retrofit/retire timeline	5	1	1.0	5.0	\$160.88
SUBTOTAL	2,807	10	7.5	925.75	\$29,786.93

National Refrigerant Recycling and Emissions Reduction Program

Summary of Annual Respondent Burden and Cost By Responder

The following tables summarize the total annual burden hours and cost by respondent type. Table 1 provides the total burden hours and cost on a respondent basis.

Table 1. Total Annual Burden Hours and Costs (All Respondents)

Respondent	Reporting (Hours)
Refrigerant Recovery/ Recycling Equipment Testing Organization	8.00
Service Establishments	2,250.00
Disposal Establishments	375.00
Refrigerant Reclaimers	320.00
Technician Certification Programs	207.00
Technicians	-
Owners	10.00
Refrigerant Wholesalers	-

Table 2. Total Annual Burden Hours and Costs (Per Respondent)

Respondent	Reporting (Hours)
Refrigerant Recovery/ Recycling Equipment Testing Organization	4.00
Service Establishments	1.00
Disposal Establishments	1.00
Refrigerant Reclaimers	10.00
Technician Certification Programs	7.00
Technicians	-
Owners	1.00
Refrigerant Wholesalers	-

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Recordkeeping (Hours)	Total Hours	Total Cost
0.25	8.25	\$365.56
-	2,250.00	\$99,697.50
97,500.00	97,875.00	\$4,336,841.25
375.00	695.00	\$30,795.45
455.00	662.00	\$29,333.22
6,023.50	6,023.50	\$266,901.29
48,013.18	48,023.18	\$2,127,906.88
165,000.00	165,000.00	\$7,311,150.00

Recordkeeping (Hours)	Total Hours	Total Cost
0.13	4.13	\$182.78
-	1.00	\$44.31
13.00	14.00	\$620.34
6.25	16.25	\$720.04
5.00	12.00	\$531.72
0.06	0.06	\$2.59
8.10	9.10	\$403.22
0.83	0.83	\$36.56

Change in Annual Respondent Burden and Cost

The following table illustrates the change in annual burden between the 2011 and 2014 ICR va

		2014 ICF	
		Activity	Annual Burden Hours
Reporting	Refrigerant Recovery/ Recycling Equipment Testing Organizations - Submit reports on approved equipment (including new model lines and failed retests/inspections)		8.00
	Certification by Owners of Refrigerant Recovery/ Recycling Equipment (or Service Established) that Change Ownership or Enter the Market Compile information, complete certification requirements		2,250.00
	Certification by Disposal Establishments that change Ownership or Enter the Market		375.00
	Certification by Refrigerant Reclaimers that Change Ownership or Enter the Market		20.00
	Reclaimer Annual Activity Report		300.00
	Technician Certification Programs Applying for Approval		25.00
	Biannual Reporting by Existing Technician Certification Programs		182.00
	Owners/operators of appliances w/charge sizes >50 lbs prepare & submit requests for extensions to 30-day repair timeline		7.50
	Owners/operators of appliances w/charge sizes >50 lbs prepare & submit requests for extensions to 1 yr retrofit/retire timeline		2.50
	Refrigerant Recovery/ Recycling Equipment Testing Organizations - Maintain records of refrigerant recovery/recycling equipment tested and its performance		0.25
	Maintenance of copies of signed statements of previous refrigerant recovery by disposal establishments		97,500.00
	Reclaimer recordkeeping		375.00
	Refrigerant wholesalers recordkeeping for refrigerant sales, including maintenance of technician certification cards from purchasers employing at least one certified technician		165,000.00
	Record keeping by Existing Technician Certification Programs		455.00
Recordkeeping	Technicians Aquiring Certification Cards		501.00
	Technicians Maintaining Certification Cards		5,010.00
	Persons servicing appliances w/charge sizes >50 lbs provide invoices to appliance owners/operators		512.50
	Owners/operators of appliances w/charge sizes >50 lbs maintain purchase and service records		512.50
	Owners/operators of appliances w/charge sizes >50 lbs - Maintain information on purged/destroyed refrigerant		0.05
	Owners/operators of appliances w/charge sizes >50 lbs - Develop/Maintain plan to retire/replace or retrofit equipment, as applicable		40,000.00

Owners/operators of appliances w/charge sizes >50 lbs - Maintain information on the calculation of the full charge using a range, as applicable	5,000.00
Owners/operators of appliances w/charge sizes >50 lbs - Maintain reports on the results of verification tests (<i>IPR and in limited instances federally owned equipment</i>)	2,500.63
Total	320,536.93
Percent Change	

values.

Contract Renewal	2011 ICR		Burden Change		
	Annual Labor Costs	Annual Burden Hours	Annual Labor Costs	Burden Hours	Labor Costs
	\$354.48	8.00	\$320.56	-	\$33.92
	\$99,697.50	2,250.00	\$90,157.50	-	\$9,540.00
	\$16,616.25	375.00	\$15,026.25	-	\$1,590.00
	\$886.20	20.00	\$801.40	-	\$84.80
	\$13,293.00	245.00	\$9,817.15	55.00	\$3,475.85
	\$1,107.75	25.00	\$1,001.75	-	\$106.00
	\$8,064.42	182.00	\$7,292.74	-	\$771.68
	\$332.33	10.00	\$400.70	(2.50)	-\$68.38
	\$110.78	0.50	\$20.04	2.00	\$90.74
	\$11.08	0.25	\$10.02	-	\$1.06
	\$4,320,225.00	97,500.00	\$3,906,825.00	-	\$413,400.00
	\$16,616.25	306.25	\$12,271.44	68.75	\$4,344.81
	\$7,311,150.00	165,000.00	\$6,611,550.00	-	\$699,600.00
	\$20,161.05	455.00	\$18,231.85	-	\$1,929.20
	\$22,199.31	-	\$0.00	501.00	\$22,199.31
	\$221,993.10	5,010.00	\$200,750.70	-	\$21,242.40
	\$22,708.88	512.50	\$20,535.88	-	\$2,173.00
	\$22,708.88	512.50	\$20,535.88	-	\$2,173.00
	\$2.22	0.05	\$2.00	-	\$0.22
	\$1,772,400.00	40,000.00	\$1,602,800.00	-	\$169,600.00

\$221,550.00	5,000.00	\$200,350.00	-	\$21,200.00
\$110,802.69	2,500.63	\$100,200.04	-	\$10,602.65
\$ 14,202,991.15	319,912.68	\$12,818,900.90	624.25	\$1,384,090.25
			0.20%	10.80%

Notes
Due to updated labor rates.
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The number of reclaimers increased from 49 to 60.
Due to updated labor rates.
Due to updated labor rates.
Adjustment of figures to match assumptions described on page 28 of ICR ("EPA estimates the breakdown of...")
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Due to updated labor rates.
Due to updated labor rates.
The number of reclaimers increased from 49 to 60.
Due to updated labor rates.
Due to updated labor rates.
Activity was previously omitted in 2011 ICR and added to 2014 for completeness.
Due to updated labor rates.
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