

Electronic Reporting of Information Requirements for Importation of Ozone Depleting Substances
OMB Control Number 2060-0498, EPA ICR Number 2014.05
Justification for Non-Substantive Change

EPA is requesting non-substantive change to ICRs 2014.06 (OMB No. 2060-0498 for Class II ODS.). EPA regulations require that before an importer can import a used ODS, the importer must petition EPA and receive a non-objection notice from EPA. Currently EPA issues approximately 25-30 non-objection notices each year for the importation of used ODS. The existing regulations at 40 C.F.R. 82.13(g)(3)(v) and 82.24(c)(4)(v) require that the EPA-issued non-objection notice and the petition “must accompany” the used ODS shipment through Customs.

CBP is currently working on a major effort to streamline the imports process for all commodities, including used ODS. As part of these efforts CBP will be transitioning to the electronic filing of required documentation rather than paper submittals. As part of the transition, CBP will be conducting a pilot program to validate that the electronic filing process is working as intended. Part of the electronic filing system is the Document Image System (DIS). In June 2015, OMB approved the use of the DIS to collect the used ODS non-objection notices and petitions (in lieu of requiring a paper copy). EPA interprets its rules to authorize the collection of the documents via DIS, so a rule change is not required to authorize the use of DIS.

Currently, the above ICR cover only the hardcopy submission of the non-objection notice and petition. Therefore, EPA is requesting a non-substantive change to these ICR to allow for electronic submission of the documents through the DIS. Thus, there is no revised version of instrument, simply an additional method for providing it.

The current ICRs approved by OMB contain the following estimates:

2060-0498: 1,601 hours, 192 of which are estimated for the entire petition process to import used Class II ODS.

The burden hours associated with ensuring the non-objection notice and petition “accompany” the import shipment is a small fraction of these subsets of hours estimated for the entire petition process. EPA believes that the electronic submission of these documents via DIS will ultimately reduce burden for importers, however no changes in burden are being requested here. The next renewal will include new burden estimates to reflect the transition from paper to electronic/DIS filing, based on the Agency’s experience.