

1 Information Collection Request Supporting Statement

PART A OF THE SUPPORTING STATEMENT

NATIONAL REFRIGERANT RECYCLING AND EMISSIONS REDUCTION PROGRAM

1) Identification of the Information Collection

a) Title and Number of the Information Collection

This information collection request (ICR) is titled “National Refrigerant Recycling and Emissions Reduction Program”, EPA ICR Number: 1626.14, Office of Management and Budget (OMB) Control Number: 2060-0256.

b) Characterization/Abstract

Section 608 of the Clean Air Act (CAA), also known as the *National Recycling and Emission Reduction Program* (the Program), directs the Environmental Protection Agency (EPA) to issue regulations governing the use of ozone-depleting substances (ODS), including chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs), during the maintenance, service, repair, or disposal of air-conditioning and refrigeration appliances.

The regulations require persons servicing refrigeration and air-conditioning appliances to observe certain service practices that reduce emissions of ozone depleting refrigerants. The regulations also establish certification programs for technicians, recovery/recycling equipment, and off-site refrigerant reclaimers. In addition, EPA requires that ozone-depleting refrigerants contained in appliances be removed prior to disposal of the appliances and that all refrigeration and air-conditioning appliances be provided with a servicing aperture that facilitates recovery of the refrigerant. The Agency requires that substantial refrigerant leaks in appliances be repaired when they are discovered. These regulations significantly reduce emissions of ozone-depleting refrigerants, and therefore aid U.S. and global efforts to minimize damage to the ozone layer and the environment as a whole.

To facilitate compliance with and enforcement of Section 608 regulations, EPA requires reporting and recordkeeping from technicians; technician certification programs; equipment testing organizations; refrigerant wholesalers and purchasers; refrigerant reclaimers; refrigeration and air-conditioning appliance owners; and other establishments that perform refrigerant removal, service, or disposal. OMB previously approved this collection under ICR Number 1626.12. Specific reporting and recordkeeping requirements were initially published May 14, 1993 (58 FR 28660) and codified at 40 CFR part 82, subpart F (§82.150 *et seq.*). Collection of this information was approved through December 31, 2017.

EPA is proposing to update the existing requirements under the Program as well as extend them to

cover appliances containing hydrofluorocarbons (HFCs) and other non-exempt substitute refrigerants. EPA is proposing regulatory changes that affect the reporting and recordkeeping requirements, including: establishing recordkeeping requirements for the disposal of appliances containing 5 to 50 pounds of refrigerant; requiring documented leak inspections of certain refrigeration and air conditioning appliances; requiring testing and use of self-sealing valves on small containers of MVAC refrigerant; and removing outdated recordkeeping and reporting requirements.

New records that would be maintained as part of the proposal include: invoices for servicing events; results of verification tests; annual and quarterly leak inspection reports; refrigerant removal at disposal; and self-sealing valve test results. New reporting requirements would include: lists of refrigerant recovery/recycling equipment; lists of certified technicians; and expanded opportunity to request extensions to the appliance repair and the appliance retrofit/retirement requirements.

EPA has estimated that there are 1,050,390 annual respondents consisting of representatives from the air-conditioning and refrigeration and small can manufacturing community. The annual cost for respondents for the collection and maintenance of records, as well as reports to EPA, is estimated to total \$35,931,685.

2) Need For and Use of the Collection

a) Need/Authority for the Collection

This proposed information collection is authorized under Section 608(a) of the Clean Air Act. This section directs the Administrator to “promulgate regulations establishing standards and requirements regarding the use and disposal” of ozone-depleting substances and to implement Section 608(c) which contains a statutory prohibition against venting of ODS and substitute refrigerants. EPA requires reporting and recordkeeping to facilitate compliance with and enforcement of the Section 608 requirements. In addition, EPA’s authority for this rulemaking is supplemented by Section 114 which authorizes the EPA Administrator to require recordkeeping and reporting in carrying out any provision of the CAA.

b) Practical Utility/Users of the Data

The purpose of the collection request is to facilitate compliance with and enforcement of Section 608 of the CAA by reducing emissions of class I and class II ozone-depleting refrigerants and their substitutes to the lowest achievable level during the service, maintenance, repair, and disposal of appliances. EPA has used and will continue to use these records and reports to ensure that refrigerant releases are minimized during the recovery, recycling, and reclamation processes.

Some recordkeeping requirements are to facilitate information sharing between regulated entities to ensure compliance with Section 608 requirements. Owners/operators of appliances use the information provided by service technicians to ensure their systems are not leaking in violation of the regulations.

Refrigerant wholesalers use the data provided by service technicians to ensure they are complying with the refrigerant sales restriction.

Most of the reporting requested from respondents under this ICR are to seek a benefit such as an extension to repairing or retrofitting an appliance leaking in violation of Section 608 requirements or to voluntarily become an organization to test and certify technicians or to test and certify recovery and recycling equipment.

3) Non-Duplication, Consultations, and Other Collection Criteria

a) Non-Duplication

The specific information requested is not currently collected by any other EPA office or any other government agency.

b) Public Notice Required Prior to ICR Submission to OMB

EPA is proposing changes to the existing recordkeeping and reporting requirements covered by this ICR. EPA is requesting comment on this ICR in that proposed rulemaking.

c) Consultations

The burden calculations for this renewal were developed based on information from EPA's consultations for the previous ICR. EPA previously consulted two refrigerant reclaimers, a refrigerant wholesaler, and two technician certification programs. EPA also consulted the California Air Resource Board (CARB), Autocare Association, and the Automotive Refrigeration Products Institute (ARPI) for the regulatory changes to Section 608 that are reflected in this ICR.

d) Effects of Less Frequent Collection

The proposed information collection requirements are either one-time, annual, or occasional submissions. All of these reporting requirements are similar to those that exist for ODS refrigerants but would be new for non-exempt substitute refrigerants. Additionally, EPA is proposing to remove the (1) one-time certification from technicians that they own certified refrigerant recovery equipment, (2) the annual report from programs certifying recovery and/or recycling equipment concerning the equipment they approve, and (3) the requirement for refrigerant recovery/recycling equipment testing organizations to submit information to EPA within 30 days of certification of a new model line of refrigerant recovery/recycling equipment.

The one-time submissions (e.g., applications for approval of technician certification organizations) and annual submissions (e.g., reclaimer annual reports) are required for EPA to track changes in industry and for long-term management of the Program. Occasional submissions, such as requests for extensions to repair, retrofit, or retirement timelines, allow entities flexibility in meeting regulatory requirements. The removal of this reporting requirement may result in non-compliance or higher costs to the entity (e.g., cost for expedited shipment of a necessary part).

e) General Guidelines

The reporting and recordkeeping requirements do not violate the regulations established by OMB at 5 CFR part 1320.5(d)(2).

f) Confidentiality

EPA informs respondents that they may assert claims of business confidentiality for any of the information they submit. Information claimed confidential will be treated in accordance with the procedures for handling information claimed as confidential under 40 CFR Part 2, Subpart B, and will be disclosed only if EPA determines that the information is not entitled to confidential treatment. If no claim of confidentiality is asserted when the information is received by EPA, it may be made available to the public without further notice to the respondents (40 CFR 2.203). The handling and confidentiality of the reporting requirements for assuring computer data security, preventing disclosure, proper storage, and proper disposal follow EPA's confidentiality regulations (40 CFR 2.201 *et seq.*).

g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4) Respondents and Information Requested

a) Respondents / North American Industry Classification System (NAICS) Codes

Table 1 lists the NAICS codes potentially affected by the information requirements covered under this ICR. These categories generally include owners/operators of industrial process refrigeration, commercial refrigeration, and comfort cooling appliances; plumbing, heating, and air-conditioning contractors; refrigerant wholesalers; manufacturers and distributors of small cans of automotive refrigerant; refrigerant reclaimers; disposers and recyclers of appliances; and testing and certifying organizations. These listings are not all-inclusive but are consistent with the types of organizations potentially impacted by this ICR.

Table 1: NAICS Codes of Potentially Affected Respondents

Industry Category	NAICS Codes	NAICS Code Definition
Agriculture and Crop Support Services	115	Support Activities for Agriculture and Forestry
Arts, Entertainment, and Recreation	71	Arts, Entertainment, and Recreation
Beverage and Ice Manufacturing	312	Beverage Manufacturing
Durable Goods Wholesalers and Dealers	423	Merchant Wholesalers - Durable Goods
	441	Motor Vehicle and Parts Dealers
Educational Services	611	Educational Services
Food Manufacturing	311	Food Manufacturing
General Merchandise Stores	452	General Merchandise Stores
	453998	All Other Miscellaneous Store Retailers (except Tobacco Stores)
Grocery and Specialty Food Stores	4451	Grocery Stores
	4452	Specialty Food Stores
	72231	Food Service Contractors
Hospitals	622	Hospitals
Non-durable Goods Wholesalers and Dealers	424	Merchant Wholesalers – Non-durable Goods
Non-food Manufacturing	322	Paper Manufacturing
	323	Printing and Related Support Activities
	324	Petroleum Manufacturing
	325	Chemical Manufacturing
	3254	Pharmaceutical Manufacturing
	326	Plastics and Rubber Manufacturing
	332	Metals Manufacturing
	333	Machinery Manufacturing
	334	Computer and Electronic Product Manufacturing
	336	Transportation Equipment Manufacturing
	3391	Medical Equipment and Supplies Manufacturing
	339999	Miscellaneous Manufacturing
Office Buildings	511	Publishing Industries (except Internet)
	512	Motion Picture and Video Industries
	515	Broadcasting
	517	Telecommunications
	518	Data Processing, Hosting, and Related Services
	519	Libraries and Archives
	522	Credit Intermediation and Related Activities

Industry Category	NAICS Codes	NAICS Code Definition
	524	Insurance Carriers
	531	Real Estate
	541	Professional, Scientific, and Technical Services
	551	Management of Companies and Enterprises
	561	Administrative and Support Services
	712	Museums, Historical Sites, and Similar Institutions
	721	Accommodation
	813	Religious, Grantmaking, Civic, Professional, and Similar Organizations
Other Warehousing, Storage, and Transportation	48	Transportation and Warehousing
	4931	Warehousing and Storage
Refrigerated Warehousing and Storage	49312	Refrigerated Warehousing and Storage
Research and Development	5417	Research and Development
Utilities	211	Oil and Gas Extraction
	221	Utilities
Warehouse Clubs and Supercenters	452910	Warehouse Clubs and Supercenters
Reclaimers	325120	Industrial Gas Manufacturing
	423930	Recyclable Material Merchant Wholesalers
	562920	Materials Recovery Facilities
	562212	Solid Waste Landfill
	424690	Other Chemical and Allied Products Merchant Wholesalers
Refrigerant Wholesalers	325120	Industrial Gas Manufacturing
	424690	Other Chemical and Allied Products Merchant Wholesalers
	42	Wholesale Trade
Service Technicians	238220	Plumbing, Heating, and Air-conditioning Contractors
Disposal Establishments	562920	Materials Recovery Facilities
	562212	Solid Waste Landfill
	423990	Other Miscellaneous Durable Goods Merchant Wholesalers
Service Establishments	811310	Commercial Industrial Machinery and Equipment (not Automotive and Electronic) Repair and Maintenance
	811412	Appliance Repair and Maintenance
Small Can Manufacturers	441310	Automotive Parts and Accessories Stores
	325120	Industrial Gas Manufacturing
Certifying Organizations	541380	Environmental Test Laboratories and Services

b) Information Requested

All records pursuant to this ICR must be available onsite at the respondents' place of business for a minimum of three years. Entities may submit reports electronically to 608reports@epa.gov or by mail to: Section 608 Program Manager; Stratospheric Protection Division; Mail Code: 6205T; U.S. Environmental Protection Agency; 1200 Pennsylvania Avenue, NW; Washington, DC 20460.

1. Refrigerant Recovery/Recycling Equipment Testing Organizations

The data items required by organizations that test and certify refrigerant recovery/recycling equipment are specified in 40 CFR 82.160(a), (b), and (e).

i) Data Items

- Application for approval by EPA to certify refrigerant recovery/recycling equipment (as applicable). Information includes:
 - ◆ List refrigerant recovery/recycling equipment present at the organization that will be used for testing;
 - ◆ Verification of expertise in refrigerant recovery/recycling equipment testing and the technical experience of the organization's personnel;
 - ◆ Verification of the organization's knowledge of the standards and recordkeeping and reporting requirements in 40 CFR Part 82, Subpart F; and
 - ◆ Description of the organization's program for verifying the performance of certified recycling and recovery equipment manufactured over the long term, specifying whether retests of equipment or inspections of equipment at manufacturing facilities will be used;
 - ◆ Verification that the organization has no conflict of interest and receives no direct or indirect financial benefit from the outcome of certification testing; and
 - ◆ Agreement to allow EPA access to records and personnel to verify the information contained in the application.
- Records of refrigerant recovery/recycling equipment testing and performance.
- Annual list of certified refrigerant recovery/recycling equipment.
- Notice of when a model of refrigerant recovery/recycling equipment fails a three-year recertification test.

ii) Respondent Activities

- Prepare and submit an application for refrigerant recovery/recycling equipment testing approval.

- Retain records of recovery/recycling equipment testing and performance and refrigerant recovery/recycling equipment that meets EPA standards.
- Notify EPA within 30 days of retesting or inspection if equipment previously certified fails the periodic re-test required by the regulation.
- Publish online a list of all certified equipment that includes the name of the manufacturer and the name or serial number of the model line and update the list annually.

2. Reclaimers

The data items required by reclaimers are specified in 40 CFR 82.164(d).

i) Data Items

- Application for reclaimer certification by EPA, including a certification that the reclaimer will:
 - ◆ Reclaim refrigerant to all the specifications in Appendix A of Subpart F that are applicable to that refrigerant;
 - ◆ Verify that each batch of refrigerant reclaimed meets these specifications using the analytical methodology prescribed in Appendix A;
 - ◆ Release no more than 1.5 percent of the refrigerant during the reclamation process;
 - ◆ Dispose of wastes from the reclamation process in accordance with all applicable laws and regulations; and
 - ◆ Maintain records and submit reports.
- Records of the analysis conducted to verify that reclaimed refrigerant meets the necessary specifications.
- Records on the quantity of material sent for reclamation, the amount reclaimed, waste products from the reclamation process, and customer and sales records.
- Annual reports noting the total annual quantity of material (the combined mass of refrigerant and contaminants) by refrigerant type sent to them for reclamation, the mass of refrigerant reclaimed by refrigerant type, and the mass of waste products produced.

ii) Respondent Activities

- Prepare a one-time application to certify that they will meet the requirements of 40 CFR 82.164.
- Maintain records of analyses conducted to verify that reclaimed refrigerant meets the necessary specifications.

- Maintain records of the names and addresses of persons sending material for reclamation and the quantity of the material (the combined mass of refrigerant and contaminants) by refrigerant type sent to them for reclamation.
- Prepare and submit to EPA annual reports detailing the quantity of each refrigerant sent for reclamation (the combined mass of refrigerant and contaminants), the mass of each refrigerant reclaimed, and the mass of waste products.
- Notify EPA within 30 days of a change in business management, location, or contact information.

3. Refrigerant Wholesalers

The data items required by refrigerant wholesalers are specified in 40 CFR 82.154(c)(3).

i) Data Item

- Refrigerant sales records that indicate the name of the purchaser, the date of sale, the quantity, and that the purchaser is a certified technician (as applicable).

ii) Respondent Activities

- Retain invoices from refrigerant sales.

4. Technician Certification Programs

The data items required by technician certification programs are specified in 40 CFR 82.161(b).

i) Data Items

- Application for technician certification approval by EPA. Application will verify:
 - ◆ Ability to produce multiple versions of examinations for each test site;
 - ◆ Sufficient internal capacity to process the scoring and the accompanying documentation; and
 - ◆ Ability to ensure the confidentiality and security of test questions and answers.
- Records of the names and addresses of all individuals taking the tests, the scores of all certification tests administered, and the dates and locations of all testing administered. These records must be retained indefinitely.
- List of technician certified through the program, including:
 - ◆ First name, middle initial, and last name of the technician;
 - ◆ Technician's city of residence when taking the test;
 - ◆ Type(s) of certification received; and
 - ◆ Date each certification was completed.

- Biannual (2x/year) reports on pass/fail rates and the next year's testing schedule.

ii) Respondent Activities

- Prepare and submit application for technician certification.
- Maintain records of testing events, scores of certification tests, and the dates and locations of tests.
- Maintain and publish online lists of technicians certified through programs after January 1, 2017.
- Prepare and submit reports to EPA every six months on the pass/fail rate and testing schedules.
- Prepare and send certification cards to technicians who pass the exam.
- Organizations that stop certifying technicians must transfer their records to another certifying program or EPA. Organizations that receive those records must inform EPA within 30 days.

5. Disposal Establishments

The data items required by disposal establishments are specified in 40 CFR 82.155(c).

i) Data Item

- Copies of signed statements attesting that refrigerant has been recovered prior to the disposal of each appliance or copies of a contract from a supplier of multiple appliances that refrigerant will be recovered prior to delivery at the disposal establishment.

ii) Respondent Activities

- Retain copies of signed statements for each piece of disposed appliance with the name and address of the person who recovered the refrigerant and the date the refrigerant was recovered.

6. Technicians

The data items required by technicians are specified in 40 CFR 82.161(a)(4).

i) Data Items

- Proof of technician certification.
- Leak inspection records.
- Service invoices to owners/operators.
- Records for the disposal of field-installed appliances with charges between 5 and 50 pounds which include: the company name, location of equipment, date of recovery, the quantity and types of refrigerant recovered, and the quantity and types of refrigerant ultimately transferred for reclamation or destruction.

ii) Respondent Activities

- Complete a certification test.
- Maintain a copy of certification at their place of business.
- When servicing appliances containing 50 or more pounds of refrigerant: prepare service invoices with information on the identity and location of the appliance, the date and type of service performed, the quantity and type of refrigerant added, the full charge of the system, and the leak rate. The technician must provide such service invoices to owners/operators with each servicing event.
- Prepare the appropriate records when disposing of field-installed appliances with charges between 5 and 50 pounds.

7. Owners/Operators of Appliances with Charge Sizes of 50 or More Pounds

The data items required by owners/operators of appliances containing 50 or more pounds of refrigerant are specified in 40 CFR 82.157(l) and (m).

i) Data Items

- Service invoices with information on the identity and location of the appliance, the date and type of service performed, the name of the person performing the service, the quantity and type of refrigerant added, the full charge of the system, and the leak rate. Typically these are provided by the technician with each servicing event.
- Records on either:
 - ◆ Quarterly leak inspections for appliances with 500 or more pounds of refrigerant and/or annual leak inspections for appliances with 50 to 500 pounds of refrigerant; or
 - ◆ Installation of an automatic leak detection system and annual inspections and recalibrations.
- Records of verification tests on repairs conducted when the leak rate is exceeded.
- Requests for extensions to the 30-day repair timeline or the one-year retrofit/retire timeline (as applicable). Submissions include the following information:
 - ◆ Date of notification to EPA;
 - ◆ Identification of the appliance;
 - ◆ Name of the owner or operator;
 - ◆ Leak rate;
 - ◆ Method used to determine the leak rate and full charge;
 - ◆ Date a leak rate above the applicable allowable rate was discovered;
 - ◆ Location of leaks(s) to the extent determined to date;

- ◆ Any repair work that has been finished thus far, including the date that work was finished;
- ◆ Plan to finish the retrofit or retirement of the system (as applicable);
- ◆ Reasons why more than one year is necessary to retrofit or retire the system (as applicable); and
- ◆ Estimate of when retrofit or retirement work will be finished (as applicable).
- Plans to retire/replace or retrofit appliances (as applicable). Plans must include:
 - ◆ Identification and location of the appliance;
 - ◆ Type and full charge of the refrigerant used in the appliance;
 - ◆ Type and full charge of the refrigerant to which the appliance will be converted, if retrofitted;
 - ◆ Itemized procedure for converting the appliance to a different refrigerant, including changes required for compatibility with the new substitute, if retrofitted;
 - ◆ Plan for the disposition of recovered refrigerant;
 - ◆ Plan for the disposition of the appliance, if retired; and
 - ◆ One-year schedule for completion of the appliance retrofit or retirement.
- Records on mothballed appliances, including the date when a system that is leaking in excess of the leak rate is mothballed and the date when refrigerant is later added back into the system.
- Records on purged or destroyed refrigerant, including information on flow rate, quantity or concentration of the refrigerant in the vent steam; and periods of purge flow.

ii) Respondent Activities

- Retain service invoices containing the information described above.
- Retain documentation from leak inspections or on leak detection systems.
- Retain documentation on verification tests for repairs when the leak rate is exceeded.
- Notify EPA when seeking an extension of time to complete repairs.
- Prepare and maintain a plan to retire/replace or retrofit leaking appliances (as applicable).
- Prepare and submit to EPA requests for extensions to the 30-day repair timeline or the one-year retrofit/retire timeline (as applicable).
- Maintain a copy of requests for extensions to the 30-day repair timeline or the one-year retrofit/retire timeline.
- Maintain records on mothballed appliances.
- Notify EPA when excluding purged refrigerants that are destroyed from annual leak rate calculations.
- Maintain records on purged or destroyed refrigerant.

8. Small Can Manufacturers

The data items for small can manufacturers are specified in 40 CFR 82.154(c)(2).

i) Data Item

- Log forms of results from self-sealing valve testing.

ii) Respondent Activities

- Conduct tests on self-sealing valves on products.
- Prepare and retain records of results from self-sealing valve tests.

5) Information Collected - Agency Activities, Collection Methodology, and Information Management

a) Agency Activities

EPA activities associated with the review of the reports and recordkeeping requirements for the Program consist of reviewing the following:

- Extension requests from owners/operators of commercial refrigeration, comfort cooling, and industrial process refrigeration appliances.
- Applications to become an independent refrigerant recovery/recycling equipment certifying organization;
- Applications to become a certified refrigerant reclaimer;
- Annual reports from reclaimers on their activities;
- Certification notices by refrigerant reclaimers that change ownership or enter the market;
- Applications to become a technician certification program;
- Reports submitted by approved technician certification programs; and

b) Collection Methodology and Management

EPA has not developed reporting or application forms, although it has a sample form to facilitate recordkeeping by small can manufacturers. Entities are encouraged to submit the required information in an electronic format to 608reports@epa.gov. The information submitted by each member of the regulated community will be stored at EPA headquarters for review and reference.

c) Small Entity Flexibility

Several of the recordkeeping and reporting requirements of the rule are intended to permit entities greater flexibility in complying with the regulation.

Technicians who work on small appliances may take a take-home test rather than a proctored test. This provision was implemented in recognition of the facts that (1) entities servicing small appliances are often small businesses, (2) many of these entities only rarely perform service on the refrigerant circuit of small appliances, and (3) the quantity of refrigerant in small appliances is less than five pounds. For similar reasons, individuals who recover refrigerant from small appliances and motor vehicle air conditioners when they are disposed of are not required to be certified and are not required to use certified refrigerant recovery/recycling equipment.

Final persons in the disposal process for small appliances and MVACs may elect not to recover refrigerant themselves so long as they obtain a signed statement from persons upstream in the disposal process that the refrigerant has been removed already. The signed statement permits the final disposer to delegate responsibility for refrigerant removal.

Owners of appliances that leak above a certain level may elect to retrofit or replace their appliances rather than repair them so long as they develop a retrofit or retirement plan. Owners/operators may take longer than 30 days to complete repairs or longer than one year to retrofit or replace appliances so long as they submit documentation to EPA explaining their need for additional time.

d) Collection Schedule

EPA requires maintenance of records for a minimum of three years. The following information is required on a specific collection schedule:

- Approved equipment testing organizations must notify EPA if a previously certified model line fails to meet EPA requirements within 30 days of the failed retest or inspection.
- On a transactional basis, reclaimers must maintain records of the quantity of each refrigerant sent to them for reclamation (the combined mass of refrigerant and contaminants), the mass of each refrigerant reclaimed, and the mass of waste products. Reclaimers must report the aggregated information by refrigerant type to EPA within 30 days of the end of the calendar year.
- Effective January 1, 2018, programs certifying technicians, excluding federally-run programs, must create and maintain a publicly-searchable database of technicians they have certified. The database must include all technicians certified after January 1, 2017.
- If a refrigerant reclaimer changes ownership, the new owner must certify with EPA within 30 days of the change of ownership.

- Owners/operators must prepare a retrofit or retirement plan within 30 days of:
 - ◆ Discovering a leak greater than the applicable threshold leak rate;
 - ◆ Making good faith efforts to repair leaks but before finishing a follow-up verification test; or
 - ◆ After a failed follow-up verification test.
- Owners/operators choosing to request an extension to the retrofit/retirement timeline must do so within seven months of discovering that the leak rate exceeded the applicable leak rate.
- Owners/operators who exclude purged refrigerants that are destroyed from annual leak rate calculations must submit information to EPA within 60 days of the first time the exclusion is used by the facility where the appliance is located.

6) Estimating the Burden and Cost of the Collection

This section provides burden tables that provide the numerical basis for the annual burden and cost of this ICR by detailing the following:

- EPA's rationale in preparing respondent burden and cost tables;
- Estimated respondent and Agency burden (hours to complete required activities);
- Estimated respondent and Agency labor costs and capital costs associated with the those activities;
- Universe of estimates; and
- Calculated burden and cost totals.

The collection activities in Sections 4 and 5 are referenced to develop these estimates. The activities for which EPA estimated burden and cost correspond directly with the activities listed in Sections 4 and 5.

a) Estimating Respondent Burden

Estimates of respondent burden and cost for the Program are presented below. All hour estimates are based on EPA's experience implementing this Program and on EPA's best professional judgment. The overall reporting and recordkeeping burden as a result of the proposed rule is higher compared to previous ICRs because 1) the universe of reporters has expanded to include owners/operators and technicians who service equipment containing HFC- and other non-exempt substitute refrigerant-containing appliances and 2) new requirements to document the disposal of mid-sized comfort cooling and commercial refrigeration appliances. There are also new requirements related to leak inspection, disposal, and self-sealing valves. All burden hours and costs presented here are annual.

b) Estimating Respondent Costs

EPA has estimated the total cost per respondent required to complete each activity.

The total cost for each respondent activity is comprised of the following:

- Labor Cost (for legal, managerial, technical, clerical, and other employees).
- Operating and Maintenance (O&M) Cost (for labor and equipment needed over time as well as for the purchase of services).

None of the reporting or recordkeeping requirements is expected to have associated capital costs.

i. Estimating Labor Costs

The labor costs reflect the total cost to employ an individual and include estimates of salaries and overhead costs. EPA estimates the average annual respondent hourly cost (labor plus overhead) for all affected entities below. In deriving these costs, EPA used the median hourly rate of \$21.46 for heating, air-conditioning, and refrigeration mechanics and installers¹ and a median hourly rate of \$13.74 for weighers, measurers, checkers, and samplers² from the Bureau of Labor Statistics. EPA then multiplied these numbers by 110% for overhead. The resulting costs of \$45.07 (for heating, air-conditioning, and refrigeration mechanics and installers) and \$28.85 (for weighers, measurers, checkers, and samplers) are the average hourly administrative cost of labor plus overhead for private firms. The cost for weighers, measurers, checkers, and samplers is applicable only to small can manufacturers.

ii. Estimating Capital and Operations and Maintenance Costs

According to the 1995 PRA, *burden* is 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.” Any activity that is not usual and customary is considered a burden. As part of the submission to OMB, EPA has estimated all costs for respondents to comply with required Agency activities that are not incurred by persons in their normal course of activities. This ICR estimate includes the time needed to review instructions, maintain records, complete paperwork, gather information, and report information.

There are two types of non-labor costs – capital/start-up costs and O&M costs. One-time capital/start-up costs include any produced physical good needed to provide the necessary information. Start-up capital must be purchased for the specific purpose of satisfying EPA’s reporting or recordkeeping requirements. Capital goods include computers, machinery, or equipment. Start-up capital costs are incurred at the beginning of an information collection period and are incurred only once. In addition to the acquisition of start-up capital, one-time activities associated with the production of capital have also been evaluated. EPA has considered capital/start-up costs and O&M costs in determining that there are

¹ Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Employment and Wages, May 2014, Heating, Air-conditioning, and Refrigeration Mechanics and Installers*, on the Internet at <http://www.bls.gov/oes/current/oes499021.htm> (visited July 13, 2015).

² Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Employment and Wages, May 2014, Weighers, Measurers, Checkers, and Samplers, Recordkeeping*, on the Internet at <http://www.bls.gov/oes/current/oes435111.htm> (visited July 30, 2015).

no non-labor related costs associated with this ICR. O&M costs are those costs associated with a paperwork requirement incurred continuously over the life of the ICR. They are defined by the PRA as “the recurring dollar amount of cost associated with O&M or purchasing services.”

The following tables summarize the annual respondent burden and cost by respondent type and reporting and recordkeeping requirement.

1. Refrigerant Recovery/Recycling Equipment Testing Organization

Annual Respondent Burden

Collection Activities	Burden Hours	Labor Costs/Entity
Publish list of all certified equipment that includes the name of the manufacturer and the name or serial number of the model line online	0.08	\$3.76
Maintain records of refrigerant recovery/recycling equipment tested and its performance	0.125	\$5.63

Each of the two refrigerant recovery/recycling equipment testing and certifying organizations approved by EPA are estimated to spend 5 minutes each year publishing a list of all certified equipment online. Each refrigerant recovery/recycling equipment testing and certifying organizations are also expected to spend 1/8 hour maintaining records of the tests as a part of normal business practices.

2. Refrigerant Reclaimers

Annual Respondent Burden

Collection Activities	Burden Hours	Labor Costs/Entity
Annual activity report	9.4	\$422.23
Reclaimer recordkeeping	11.7	\$527.79
Maintain records that analysis conducted to verify that reclaimed refrigerant meets the necessary specifications	4.3	\$195.29
Certification by refrigerant reclaimers that change ownership or enter the market	5.0	\$225.33

Reclaimers must maintain records and report annually on the quantity of material sent to them for reclamation, the amount reclaimed, waste products from the reclamation process, and customer and sales records. Compiling this information, preparing it for EPA, and submitting it to EPA is estimated to take approximately 9.4 hours per year for ODS, HFC, and other non-exempt substitute refrigerants.³

³ In the previous ICR, the burden for preparing the annual activity report was 5.0 hours for ODS appliances only. The recordkeeping burden was scaled to include appliances containing HFCs and other non-exempt refrigerants

Reclaimers must maintain records of refrigerant sales transactions. EPA estimates that each reclaimer will spend approximately 14 minutes per recordkeeping event with a total of 50 events per year.⁴ Therefore, each reclaimer will spend 11.7 hours maintaining records annually.

Reclaimers must also maintain records of analyses conducted to verify that reclaimed refrigerant meets the necessary specifications. EPA estimates that each reclaimer will spend approximately 1 minute per day maintaining records. Therefore, each reclaimer will spend approximately 4.3 hours maintaining records annually.

Based on experience from previous years, EPA estimates that four reclaimers will submit one-time applications for certification. Each submission is estimated to take 5 hours.

3. Refrigerant Wholesalers

Annual Respondent Burden

Collection Activities	Burden Hours	Labor Costs/Entity
Recordkeeping for refrigerant sales, including maintenance of technician certification cards from purchasers employing at least one certified technician	1.55	\$69.67

EPA estimates that each refrigerant wholesaler must spend approximately four minutes maintaining invoices that indicate the name of the purchaser, the date of sale, the quantity, and verification that the purchaser is a certified technician (as applicable).⁵ EPA estimates that each refrigerant wholesaler performs 25 recordkeeping actions per year, or 1.55 annual burden hours.

4. Technician Certification Programs

Annual Respondent Burden

Collection Activities	Burden Hours	Labor Costs/Entity
Technician certification programs applying for approval	5.0	\$225.33
Maintain list/database of technicians certified	0.17	\$7.51
Biannual reporting by existing certification programs	2.0	\$90.13

based on the inventory of equipment.

⁴ In the previous ICR, the burden for maintaining records was 0.125 hours for ODS appliances only. The recordkeeping burden was scaled to include appliances containing HFCs and other non-exempt refrigerants based on the inventory of equipment.

⁵ In the previous ICR, the burden for maintaining records was 0.125 hours for ODS appliances only. The recordkeeping burden was scaled to include appliances containing HFCs and other non-exempt refrigerants based on the inventory of equipment.

Recordkeeping by existing certification programs	5.0	\$225.33
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EPA estimates that it will take five hours for new organizations to compile the necessary information to apply for the certification program approval.

Technician certification programs are required to publish online a list or database documenting who they have certified and what type of certification each individual received. Each of the testing organizations are also required to submit biannual reports summarizing the numbers of previously certified individuals, individuals taking the tests, scores of all certification tests, and the dates and locations of all tests administered. EPA estimates that technician certification programs spend five minutes publishing online lists and one hour completing each report. EPA expects programs to publish lists and complete reports twice a year. EPA estimates that each technician certification program spends five hours annually maintaining records on each technician certified through their programs.

5. Disposal Establishments

Annual Respondent Burden

Collection Activities	Burden Hours	Labor Costs/Entity
Maintenance of copies of signed statements of previous refrigerant recovery by disposal establishments	13.0	\$585.86

Disposal establishments spend an estimated three minutes per business day (260 events per year) collecting and maintaining copies of signed statements verifying that refrigerant has been removed from appliances before they are accepted for disposal.

6. Technicians

Annual Respondent Burden - Certification

Collection Activities	Burden Hours	Labor Costs/Entity
Maintain certification cards	0.017	\$0.75
Acquire certification cards	0.017	\$0.75

EPA estimates that approximately 10 percent of the estimated 300,000 technician labor force turns over each year, necessitating certification. EPA estimates that each technician will spend one minute maintaining a copy of the certification card.

Annual Respondent Burden - Preparing and Maintaining Records

Collection Activities	Burden Hours	Labor Costs/Entity
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Prepare and provide invoices for serviced appliances with charge sizes 50 to 500 lbs.	0.14	\$6.35
Prepare and provide invoices for serviced appliances with charge sizes >500 lbs.	0.12	\$5.48
Maintain leak inspection records	0.13	\$5.92
Maintain disposal records for appliances with charge sizes of 5 - 50 lbs.	0.41	\$18.26

Technicians servicing ODS, HFC, and other non-exempt substitute refrigerant-containing appliances with charge sizes of 50 or more pounds are required to provide records of the following: the identity and location of the appliance, the date and type of service performed, the quantity and type of refrigerant added, the full charge of the system, and the leak rate. EPA estimates that appliances containing 50 to 500 pounds of refrigerant will be serviced annually and that appliances with 500 or more pounds will be serviced quarterly. EPA estimates that each technician will provide eight invoices a year, spending two minutes preparing and one minute maintaining each record.⁶

Technicians disposing of field-installed appliances with charge sizes between 5 and 50 pounds are also required to maintain records on: the quantity and types of refrigerant recovered at disposal; the quantity and type of refrigerant transferred for reclamation or destruction; the company name; and date. EPA estimates that technicians spend one minute per record and will dispose of an average of 24 pieces of equipment each year.

7. Owners/Operators

Annual Respondent Burden - Reporting

Collection Activities	Burden Hours	Labor Costs/Entity
Prepare and submit requests for extension to 30-day repair timeline	0.5	\$22.53
Prepare and submit requests for extension to 1-year retrofit/retire timeline	0.5	\$22.53

Owners/operators of IPR, comfort cooling, or commercial refrigeration appliances that contain more than 50 lbs. of ODS or HFC refrigerant may apply to EPA for an extension to the leak repair and appliance retrofit/retire timeframe. EPA estimates that each request will take 30 minutes to complete.

Annual Respondent Burden - Recordkeeping

⁶ In the previous ICR, EPA had assumed a burden of 1.5 minutes to provide invoices. In this ICR, EPA assumes an additional burden of 0.5 minutes for documenting the additional information required.

Collection Activities	Burden Hours	Labor Costs/Entity
Maintain information on purged/destroyed refrigerant	0.025	\$1.13
Develop/maintain plan to retire/replace or retrofit appliances	8.0	\$360.53
Maintain purchase and service records	0.11	\$4.91
Maintain leak inspection records	0.073	\$3.27
Maintain reports on the results of verification tests for repairs to systems that exceed the leak rate threshold	0.025	\$1.13

EPA estimates that owners/operators of appliances normally containing 50 or more pounds of refrigerant spend 1.5 minutes maintaining information on purged and destroyed refrigerant. Owners/operators planning to retire/replace or retrofit appliances spend eight hours on developing or maintaining a plan. EPA estimates that one percent of HFC appliances will necessitate a plan. EPA has adjusted the number of expected retirements to account for more extensions to the repair timeline.

Owners/operators of ODS, HFC, and other non-exempt substitute refrigerant-containing appliances with charge sizes of 50 or more pounds are required to maintain records of the following for each refrigerant addition: the identity and location of the appliance, the date and type of service performed, the quantity and type of refrigerant added, the full charge of the system, and the leak rate. EPA estimates an average annual burden of approximately 6.5 minutes per owner/operator.

Owners/operators are required to maintain reports on quarterly and annual inspections and on the results of verification tests and leak inspections any time the leak rate threshold is exceeded. EPA estimates that maintaining leak inspection records requires one minute of burden and that each owner/operator will maintain approximately five records. EPA estimates that 1.5 minutes is required to maintain reports on the results of verification tests any time the leak threshold is exceeded.

8. Small Can Manufacturers

Annual Respondent Burden - Reporting

Collection Activities	Burden Hours	Labor Costs/Entity
Maintain records of self-sealing valve test data and log forms for 3 years	0.30	\$8.66

Manufacturer of small cans of refrigerant are required to conduct tests to verify that self-sealing valves function and maintain logs of test results. EPA estimates that manufacturers will require 1.5 minutes to document each test result and that tests will occur monthly.

c) Estimating the Respondent Universe and Total Burden and Costs

The respondent universe as well as the frequency of reporting is defined in 40 CFR, Part 82, Subpart F, and includes the number of respondents for established refrigerant recovery/recycling equipment testing organizations; averages for the number of service establishments, disposers, and refrigerant reclaimers that enter the market or change ownership; refrigerant wholesalers; technician certification programs; technicians acquiring certification and maintaining certification cards; owners of refrigeration and air-conditioning appliances; owners of industrial process refrigeration appliances; and small can manufacturers.

EPA used past experience, previously reported data, modeling, and estimates from the affected community to determine the number of respondents (or the respondent universe). The estimates are based upon EPA's experience in implementing the Program since 1993 and analysis conducted in the Technical Support Document that accompanies this rulemaking.⁷ A listing of these entities follows:

- **Refrigerant/Recycling Equipment Testing Organizations:** Testing organizations for refrigerant recovery/recycling equipment have remained at two organizations since inception of the regulations during May 1993. Based on past experience, EPA does not anticipate that additional entities will apply to become approved refrigerant recovery/recycling equipment testing organizations.
- **Refrigerant Reclaimers:** EPA currently has 61 certified refrigerant reclaimers who must submit annual activity reports. Based on EPA's experience, EPA estimates four reclaimers per year will submit one-time applications to EPA to be certified.
- **Refrigerant Wholesalers:** EPA believes that the number of establishments that sell refrigerant has remained the same over the past few years. This ICR assumes that the number of wholesalers has remained at 200,000.
- **Technician Certifying Programs:** EPA currently has 88 certified technician certifying programs. Based on EPA's experience, EPA estimates five new organizations per year will submit materials to EPA requesting that they be authorized to test and certify technicians.
- **Technicians:** EPA assumes that the number of technicians entering the workplace has remained constant with those that who have left the workforce. This ICR assumes that the number of technicians has remained constant at 300,000. EPA assumes that 10 percent of the technician labor force turns over each year (i.e., 30,000 technicians), necessitating certification.
- **Disposal Establishments:** EPA assumes that the number of disposal establishments (7,500) has not changed since the previous ICR.

⁷ See Technical Support Document: Analysis of the Economic Impact and Benefits of Proposed Revisions to National Recycling and Emission Reduction Program. August 2015. Available at: [\[insert docket location\]](#)

■ **Owners/Operators:**⁸

- ◆ Based on actual submissions to EPA, the Agency estimates that four owners/operators of comfort cooling, commercial refrigeration, and industrial process refrigeration appliances with charge sizes greater than 50 lbs. will choose to exclude the amount of purged and destroyed refrigerant from their leak rate calculations.
- ◆ EPA allows owners/operators of industrial process refrigeration, comfort cooling, and commercial refrigeration appliances with a charge size of 50 or more pounds to submit a written request for an extension to leak repair requirements. The number of extensions is estimated partly based on the number of actual extensions filed for ODS industrial process refrigeration appliances in previous years. EPA also accounts for additional requests expected due to fewer comfort cooling and commercial refrigeration appliance retirements and retrofits occurring associated with the allowing extensions for non-federal ODS comfort cooling and commercial refrigeration appliances and HFC-containing appliances. EPA estimates that 4,556 owners/operators of ODS and HFC appliances will prepare and submit request for extensions each year.
- ◆ 61 owners/operators of appliances with a charge size of 50 or more pounds are expected to prepare and submit requests for extensions to the one year retrofit/retire timeline. This estimate is based on the number of IPR and federally-owned appliances that historically sought extensions. The number of extensions for IPR is scaled up to account for extensions requested for comfort cooling and commercial refrigeration (ODS and HFC appliances), and IPR (HFC appliances).
- ◆ EPA estimates that 4,092 owners/operators will develop and maintain the required appliance retire/retrofit report on-site at their place of business. EPA assumes that fewer retrofits/retirements will now occur due to the availability of extension requests.
- ◆ EPA estimates that 542,729 owners/operators of appliances with charge sizes of 50 or more pounds would need to maintain annual or quarterly service invoices. The number of owners/operators is estimated based on the total number of appliances and the average number of appliances per model facility in the Technical Support Document associated with this rule.
- ◆ EPA estimates that there are 385,322 events that would exceed the leak rate threshold in IPR, comfort cooling, and commercial refrigeration appliances. For the purposes of this analysis, EPA assumes that the number of leak events is equivalent to the number of owners/operators that would need to keep records on the results of the verification tests when those thresholds are exceeded.

⁸ All of the following assumptions about the number of owners/operators of comfort cooling, commercial refrigeration, and industrial process refrigeration appliances were developed in the Technical Support Document that accompanies this rulemaking. For more detail on the methodology and modeling approach, please see: Technical Support Document: Analysis of the Economic Impact and Benefits of Proposed Revisions to National Recycling and Emission Reduction Program. August 2015. Available at: [\[insert docket location\]](#)

- **Small Can Manufacturers:** There are an estimated 10 manufacturers of small cans of refrigerant that need to comply with the self-sealing valve requirements.⁹

For the entities that may be subject to the proposed regulatory actions, an estimated 950,500 are small businesses. Additional information on small business impacts can be found in the Technical Support Document.¹⁰

d) Estimating Agency Burden and Cost

The hourly rate for EPA staff at the GS-13 Step 1 level is \$35.03 per hour. This hourly basic rate is from the 2015 GS salary schedule listed in the Federal Wage Page of the Office of Personnel Management website <http://www.opm.gov/oca>. EPA then multiplied the hourly rate by the standard government benefits and overhead multiplication factor of 1.6. The resulting rate that was used in estimating annual Agency burden and cost is \$56.05 ($\35.03×1.6).

EPA has used past experience and reporting data in addition to estimates from the affected community in determining the number of respondents for which the Agency would assume the burden of review or response. The following paragraphs describe the amount and degree of burden endured by EPA review of required respondents' reports.

- **Refrigerant Reclaimers:** EPA currently has 61 certified refrigerant reclaimers who must submit annual activity reports. EPA will spend one hour reviewing each of the annual reports for a total of 61 hours per year.

Based on EPA's experience, it is assumed that four new refrigerant reclaimers per year will submit one-time applications to EPA to be certified. EPA spends one hour reviewing and approving each certification for a total of four hours per year.

- **Technician Certifying Programs:** EPA currently has 88 certified technician certifying programs. Each program is required to submit biannual activity reports to EPA. EPA will spend one hour reviewing each biannual activity report, for a total of 176 hours per year.

Based on EPA's experience, the Agency expects to certify five new technician certification organizations per year. EPA expects to spend two hours reviewing and approving each application, for a total of 10 hours per year.

- **Owners/Operators:** EPA estimates that it takes one-half hour to review and make a determination on each of the anticipated 4,556 requests from owner/operators of industrial process refrigeration, comfort cooling, and commercial refrigeration appliances for an extension to the 30-day repair requirement for mandatory leak repair, for a total of 2,278 hours per year.

⁹ See Technical Support Document: Analysis of the Economic Impact and Benefits of Proposed Revisions to National Recycling and Emission Reduction Program. August 2015. Available at: [\[insert docket location\]](#)

¹⁰ Technical Support Document: Analysis of the Economic Impact and Benefits of Proposed Revisions to National Recycling and Emission Reduction Program. August 2015. Available at: [\[insert docket location\]](#)

EPA estimates one hour to review and make a determination on anticipated 61 requests from the owner/operator of industrial process refrigeration, comfort cooling, and commercial refrigeration appliances for an extension to the one-year retrofit requirement under the leak repair requirements, for a total of 61 hours a year.

e) Bottom Line Burden Hours and Cost Tables

The bottom line burden hours and cost tables for respondents and the Agency are summarized below for all activities.

i) Respondent Tally

Table 2 and Table 3 summarize total annual respondent burden and cost by respondent type and activity.

Table 2: Total Annual Respondent Reporting Burden and Costs

Respondent Type	Activity	Number of Respondents	Number of Responses per Respondent	Burden Hours per Response	Annual Burden Hours	Annual Labor Costs
Owners/ Operators of Appliances with Charge Sizes of 50 or More Pounds	Prepare and submit requests for extensions to 30-day repair timeline	4,556	1	0.50	2,278	\$102,663
	Prepare and submit requests for extensions to 1-year retrofit/retire timeline	61	1	0.50	30	\$1,366
Refrigerant Reclaimers	Reclaimer annual activity report	61	1	9.37	572	\$25,756
	Certification by Refrigerant Reclaimers that Change Ownership or Enter the Market	4	1	5.00	20	\$901
Refrigerant Recovery/ Recycling Equipment Testing Organizations	Publish online list of all certified equipment	2	1	0.08	0.17	\$8
Technician Certification Programs	Applying for approval	5	1	5.00	25	\$1,127
	Maintain list/database of technicians certified	88	2	0.08	15	\$661
	Biannual reporting by existing technician certification programs		2	1.00	176	\$7,932
	SUBTOTAL	varies	varies	varies	3,116	\$140,414

Table 3: Total Annual Respondent Recordkeeping Burden and Costs

Respondent Type	Activity	Number of Respondents	Number of Responses per Respondent	Burden Hours per Response	Annual Burden Hours	Annual Labor Costs
Disposal Establishments	Maintenance of copies of signed statements of previous refrigerant recovery by disposal establishments	7,500	260	0.050	97,500	\$4,393,935
Owners/ Operators of Appliances with Charge Sizes of 50 or More Pounds	Maintain information on purged/destroyed refrigerant	4	1	0.025	0.1	\$4
	Develop/maintain plan to retire/replace or retrofit equipment, as applicable	4,092	1	8.00	32,738	\$1,475,368
	Maintain purchase and service records	542,729	4.35	0.025	59,080	\$2,662,486
	Maintaining leak inspection records		4.35	0.017	39,386	\$1,774,990
	Maintain reports on the results of verification tests any time the leak rate threshold is exceeded	385,322	1.00	0.025	9,633	\$434,123
	Refrigerant Reclaimers	Reclaimer Recordkeeping	61	50	0.23	714
Maintain records that analysis conducted to verify that reclaimed refrigerant meets the necessary specifications		260		0.017	264	\$11,912
Refrigerant Recovery/ Recycling Equipment Testing Organization	Maintain records of refrigerant recovery/recycling equipment tested and its performance	2	1	0.125	0	\$11
Refrigerant Wholesalers	Recordkeeping for refrigerant sales, including maintenance of technician certification cards from purchasers employing at least one certified technician	200,000	25	0.062	309,182	\$13,933,606

Respondent Type	Activity	Number of Respondents	Number of Responses per Respondent	Burden Hours per Response	Annual Burden Hours	Annual Labor Costs
Small Can Manufacturers	Maintain records of self-sealing valve test data and log forms for 3 years	10	12	0.025	3	\$87
Technician Certification Programs	Record keeping by existing technician certification programs	88	1	5.00	440	\$19,829
Technicians	Maintaining certification cards	300,000	1	0.017	5,010	\$225,781
	Acquiring certification cards		1	0.017	501	\$22,578
	Persons servicing CC appliances, and IPR and CR appliances 50-500 lbs. provide invoices to appliance owners/operators		4.23	0.033	42,298	\$1,906,185
	Persons servicing IPR and CR appliances >500 lbs. provide invoices to appliance owners/operators		3.65	0.033	36,475	\$1,643,795
	Persons servicing appliances maintain leak inspection records		8	0.017	39,386	\$1,774,990
	Technicians disposing of appliances with 5 - 50 lbs. refrigerant maintaining records on quantity and types of refrigerant recovered at disposal and the quantity and type of refrigerant transferred for reclamation or destruction		24.32	0.017	121,586	\$5,479,395
SUBTOTAL		varies	varies	varies	794,198	\$35,791,271

Table 4: Total Annual Respondent Burden

Number of Respondents	Number of Responses	Hour Burden	Labor Costs
1,050,390	24,441,490	797,314	\$35,931,685

ii) The Agency Tally

Table 5 and Table 6 summarize total annual agency burden and cost by and activity.

Table 5: Annual Agency Burden and Cost

Activity	Number of Respondents	Number of Responses per Respondent	Burden Hours to Review each Response	Total Annual Agency Hours	Total Agency Labor Costs
Reclaimer annual activity report	61	1	1	61	\$3,419
Certification by refrigerant reclaimers that change ownership or enter the market	4	1	1	4	\$224
Biannual reporting by existing technician certification programs	88	2	1	176	\$9,864
Technician certification programs applying for approval	5	1	2	10	\$560
Owners/operators of appliances w/charge sizes of 50 or more lbs prepare & submit requests for extensions to 30 day repair timeline	4,556	1	0.5	2,278	\$127,681
Owners/operators of appliances w/charge sizes of 50 or more lbs prepare & submit requests for extensions to 1 year retrofit/retire timeline	61	1	1	61	\$3,398
SUBTOTAL	4,777	varies	varies	2,590	\$145,148

Table 6: Total Annual Agency Burden

Number of Respondents	Number of Responses	Hour Burden for Review	Labor Costs
4,777	4,863	2,590	\$145,148

Variations in the Annual Bottom Line

EPA does not anticipate a significant variation (>25%) in the annual respondent reporting /recordkeeping burden or cost over the course of the clearance period. Likewise, the government burdens and costs are not anticipated to vary significantly.

f) Reasons for Change in Burden

EPA has proposed several regulatory changes to the refrigerant management requirements under Section 608 of the CAA, since the previous renewal of this ICR. To minimize the harm that both ODS and HFC refrigerants have on the environment and to fully implement the prohibition on venting, EPA proposed extending existing requirements under the Program to cover appliances containing HFCs, and revising the rule components associated with leak repair, as well as recordkeeping and reporting. Further, EPA proposed that manufacturers of small cans of MVAC refrigerant install and test self-sealing valves to prevent the release of refrigerant to the atmosphere. EPA has also proposed to remove the one-time certification requirement that technicians own recovery equipment and the requirement for refrigerant recovery/recycling equipment testing organizations to submit annual reports. These regulatory changes have resulted in new requirements for reporting and recordkeeping, as well as removed some previous requirements. The net result is an increase in the time required to submit reports and maintain records in this ICR.

EPA has also adjusted costs based on updated labor rates.

g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to range from 11 minutes to 20 hours per year for each respondent. The average reporting and recordkeeping burden for this collection is 0.03 hours per response. This estimate includes time for preparing and submitting reports and maintaining records on-site at the respondents' places of business.

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 No. EPA-HQ-OAR-2015-0453, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. 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 OAR 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, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. EPA-HQ-OAR-2015-0453 and OMB control number 2060-0256 in any correspondence.