

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION
9000-0191, High Global Warming Potential Hydrofluorocarbons**

A. Justification

1. Administrative requirements. FAR Case 2014-026, High Global Warming Potential Hydrofluorocarbons, modifies FAR provision 52.223-11, Ozone-Depleting Substances, and 52.223-12, Refrigeration Equipment and Air Conditioners, to address high global warming potential (GWP) hydrofluorocarbons (HFCs). For equipment and appliances that normally contain 50 or more pounds of HFCs or HFC blends, the clauses will now include requirements to track by type, equipment/application, contract, agency, and location, the amount in pounds of HFCs or HFC blends—

- a. Contained in such equipment and appliances delivered to the Government; or
- b. Added or taken out of such equipment and appliances that will be maintained, repaired, or disposed under the contract.

The contractor is required to report the information annually to a centralized Government web-site.

2. Use of information. Agencies will use the information from contractors on high GWP HFCs to assist in tracking and implementing the President’s Climate Action Plan requirements for agencies to better comply, where feasible, with procuring climate-friendly alternatives to HFCs and transition to more sustainable alternatives in the future, and provide information necessary for agencies to better comply with the greenhouse gas reporting requirements of Executive Order 13693, Planning for Sustainability in the next Decade.

3. Consideration of information technology. Improved information technology is used to the maximum extent practicable. The contractors will submit this information electronically to a central Government website.

4. Efforts to identify duplication. This requirement is being issued under the Federal Acquisition Regulation (FAR) which has been developed to standardize Federal procurement practices and eliminate unnecessary duplication. This collection is not duplicative of any other information required from offerors.

5. If the collection of information impacts small businesses or other entities, describe methods used to minimize burden. The burden applied to small businesses is the minimum consistent with applicable laws, Executive Orders, regulations, and prudent business practices.

6. Describe consequence to Federal program or policy activities if the collection is not conducted less frequently. The information is required at least annually, on a fiscal year basis, to enable agencies to better meet the greenhouse gas emission reduction goals and annual reporting requirements of E.O. 13693. To provide the information less

frequently would mean that the agencies would not have timely access to the information required for the agency reports.

7. Special circumstances for collection. The collection is fully consistent with guidelines in 5 CFR 1320.6.

8. Efforts to consult with persons outside the agency. A notice was published in the *Federal Register* at 80 FR 26883, on May 11, 2015. Sixteen comments were received. None of these comments impacted the information collection requirements. A 30-day notice was published in the *Federal Register* at 80 FR 81328 on December 29, 2015. One comment was received. This individual comment did not impact information collection requirements.

9. Explanation of any decision to provide any payment or gift to respondents other than remuneration of contractors or grantees. Not applicable.

10. Describe assurance of confidentiality provided to respondents. This information is disclosed only to the extent consistent with prudent business practices, and current regulations.

11. Additional justification for questions of a sensitive nature. No questions of a sensitive nature are involved.

12. Estimated total annual public hour burden.

a. 52.223-11(c). To estimate the number of respondents affected by the reporting requirement in 52.223-11, the Government reviewed the number of contracts awarded or orders issued for the following Federal Supply Code Categories, which are the ones that would most commonly be used for the bulk materials, products used for maintenance, and equipment containing HFCs:

FSC:	Title:	HFCs/Products:
4110	Refrigerating Equipment	Small appliances, refrigerators/refrigeration systems (refrigerants and foam blowing agents in equipment), cold storage, commissary refrigeration equipment, etc.
4120	Air-Conditioning Equipment	Room AC, Split AC Systems, Building Chillers, etc.
4210	Firefighting Equipment	Clean Agent Fire Suppression Systems/Equipment (installed room flooding systems, portable fire extinguishers, aircraft/tactical vehicle fire/explosion suppression systems, etc.)
6830	Gases: Compressed and Liquefied	Bulk refrigerants and fire suppressants
6850	Miscellaneous Chemical Specialties	Solvents, dusters, freezing compounds, mold release agents, etc.
8030	Preservatives	Corrosion Prevention Compounds, foam sealants, aerosol mold

	and Sealing Compounds	release agents, etc.
9150	Oils and Greases	Fluorocarbon lubricants (primarily aerosols)

Based on Federal Procurement Data System (FPDS) data for FY 2014 for acquisition of supplies in the above FSCs, there were 9,672 contracts awarded and orders issued to 2,444 unique vendors, of which 1,683 (69%) were small businesses.

The Government estimates that 2,300 (94 per cent) of these unique vendors will receive contracts or awards that require reporting of HFCs, 1 response per year per vendor, average of 8 hours per response.

Estimated respondents per year:	2,300
Responses per respondent:	x <u>1</u>
Total annual responses:	2,300
Preparation hours per response:	x <u>8</u>
Total response burden hours:	18,400
Average Wage	x <u>\$45*</u>
Total cost to respondents	\$828,000

*The total cost per response is approximately \$360.

b. 52.223-12(d).

To estimate the number of respondents affected by the reporting requirement in 52.223-12, the Government reviewed the number of contracts awarded or orders issued for Federal Supply Code Categories J041 (Maintenance and Repair of Refrigeration, Air Conditioning Equipment) and K041 (Modification of Refrigeration, Air Conditioning Equipment), which are the ones that would most commonly be used for repair, maintenance, and disposal of air conditioning and refrigerating equipment.

Based on FPDS data for FY 2014 for acquisition of services in the above FSCs, there were 2,251 contracts awarded and orders issued to 872 unique vendors, of which 643 (74%) were small businesses.

The Government estimates that these 872 unique vendors will receive contracts or orders that require reporting of HFCs, 1 response per year per vendor, average of 8 hours per response.

Estimated respondents per year:	872
Responses per respondent:	x <u>1</u>
Total annual responses:	872
Preparation hours per response:	x <u>8</u>
Total response burden hours:	6,976
Average Wage	x <u>\$45*</u>
Total cost to respondents	\$313,920

*The total cost per response is approximately \$360.

c. Total.

Estimated respondents per year:	3,172
Responses per respondent:	x <u>1</u>
Total annual responses:	3,172
Preparation hours per response:	x <u>8</u>
Total response burden hours:	25,376
Average Wage	x <u>\$45*</u>
Total cost to respondents	\$1,141,920

13. Total annual cost burden other than shown in items 12 and 14.

There are no costs other than those shown in items 12 and 14.

14. Estimated Cost to the Government.

Total annual responses:	3,172
Hours per response:	x <u>1</u>
Total response burden hours:	3,172
Average Wage	x <u>\$45*</u>
Total cost to Government.	\$142,740

* We used a rate equivalent to a GS-12, Step 5 or \$33.06/hour (from the 2014 OPM GS Salary Table), added overhead at 36 percent (the OMB-mandated burden rate for A-76 public-private competitions, rounded to the nearest percent), and rounded the average wage to the nearest whole dollar, or \$45/hour.

15. Explain reasons for program changes or adjustments reported in Item 13 or 14.

This is a new information collection requirement, so there are no changes or adjustments.

16. Outline plans for published results of information collections. Results will not be tabulated or published.

17. Approval not to display expiration date. Not applicable.

18. Explanation of exception to certification statement. Not applicable.

B. Collection of Information Employing Statistical Methods. Statistical methods are not used in this information collection.