

# INFORMATION COLLECTION REQUEST FOR SERVICING OF MOTOR VEHICLE AIR CONDITIONERS (RENEWAL)

## SUPPORTING STATEMENT

### 1. Identification of Information Collection

a) Title: "Servicing of Motor Vehicle Air Conditioners (Renewal)"

OMB Control Number: 2060-0247

EPA ICR Number: 1617.09

b) Short Characterization/Abstract

Section 609 of the Clean Air Act Amendments of 1990 (Act) provides general guidelines for motor vehicle air conditioning (MVAC) refrigerant handling and MVAC servicing. In 1992, EPA developed regulations under Section 609 that were published in 57 FR 31242, and codified at 40 CFR Subpart B (§ 82.30 et seq.). This supporting statement justifies an extension to collect the information required by the recordkeeping and reporting requirements mandated by Section 609 and delineated in 40 CFR 82, Subpart B. This ICR collects information from any establishment that may service or maintain motor vehicle air conditioners, as well as independent standards testing organizations and organizations with technician certification programs.

Section 609(b)(2)(A) of the Act requires:

- Refrigerant handling equipment certified by EPA or by an independent standards testing organization. Certification standards are particular to the type of equipment and the refrigerant to be recovered, and must be consistent with the SAE International, formerly the Society of Automotive Engineers (SAE), standards for MVAC equipment.
- Independent standards testing organizations certified by EPA. Independent laboratories must submit an application that documents: the organization's capacity to accurately test equipment compliance with applicable standards consistent with the SAE standards for handling refrigerant, an absence of conflict of interest or financial benefit based on test outcomes, and an agreement to allow EPA access to verify application information.

Section 609(b)(4) of the Act requires automotive technician training and certification in the proper use of approved refrigerant handling equipment. Programs that perform technician training and certification activities must apply to EPA for approval by submitting verification that its program meets EPA standards. Each approved technician certification program is required to conduct periodic reviews and updates of test material, submitting a written summary of the review and program changes to EPA for review and approval every two years (as per 40 CFR 82.40(c)).

Certification, reporting and recordkeeping. All required records must be retained on-site for a minimum of three years, unless otherwise indicated (40 CFR 82.42(b)).

Section 609(c) of the Act states that effective January 1, 1992, no person may service any motor vehicle air conditioner without being properly trained and certified, nor without using properly approved refrigerant handling equipment. To this end, 40 CFR 82.42(a) states that no later than January 1, 1993, each service provider must have submitted to their EPA Regional office on a one-time basis a statement signed by the owner of the equipment or another responsible officer that provides the name of the equipment purchaser, the address of the service establishment where the equipment will be located, the manufacturer name, equipment model number, date of manufacture, and equipment serial number. The statement must also indicate that the equipment will be properly used in servicing motor vehicle air conditioners and that each individual authorized by the purchaser to perform service is properly trained and certified. The information is used by EPA's Stratospheric Protection Division (SPD) to verify compliance with Section 609 of the Act.

Any person who owns approved refrigerant handling equipment must maintain records of the name and address of any facility to which refrigerant is sent. Additionally, any person who owns approved refrigerant handling equipment must retain records demonstrating that all persons authorized to operate the equipment are currently certified technicians.

The sale or distribution of any class I or class II substance suitable for use in an MVAC that is in a container of less than 20 pounds may only be sold to technicians certified under Section 609(e), unless the purchase of small containers is for resale only. In that case, the seller must obtain a written statement from the purchaser that the containers are for resale only, and must indicate the purchaser's name and business address. When a certified technician purchases small containers of refrigerant for servicing motor vehicles, the seller must have a reasonable basis for believing the accuracy of the information presented by the purchaser. In all cases, the seller must display a sign where sales occur that states the certification requirements for purchasers.

## **2. Need for and Use of the Collection**

### a) Authority for the Collection

The information requested for all entities that service motor vehicle air conditioning is required by Section 609(d) of the Act and 40 CFR 82.36 and 82.42. This includes certification of both approved equipment and properly trained personnel. Section 609(b)(2)(A) and 40 CFR 82.38 require the approval of independent standards testing organization by EPA. Automotive air conditioning technician certification programs are referred to in Section 609(b)(4), and applicable requirements for program certification are detailed in 40 CFR 82.40. Reporting requirements associated with the sale of small containers for resale only are noted in Section 609(e) of the Act and 40 CFR 82.42(b)(3). The reporting requirements for the motor vehicle recycling program are derived from Section 114 of the Act.

### b) Practical Utility/Users of the Data

MVAC service establishments are required, by Section 609 of the Act, to have purchased approved refrigerant handling equipment and to have only properly trained and certified personnel using the equipment by January 1, 1992. They must submit a certification statement to

EPA by January 1, 1993 certifying that the MVAC service establishment has acquired and is properly using, approved equipment and that each individual authorized to use the equipment is properly trained and certified. The Agency uses the certificates to confirm compliance with Section 609. Presently, only new MVAC service establishments or establishments that have experienced a change in ownership are required to submit the one-time certification statement to EPA. Purchases of additional pieces of approved refrigerant handling equipment do not require the submission of additional certification statements as long as the establishment has previously submitted the certification statement.

#### *i) Equipment Certification*

As per 40 CFR 82.36(a)(1), the Agency is required either to certify refrigerant handling equipment itself or to approve independent laboratories to test and certify equipment. In order for EPA to certify equipment, the Agency must be provided with information that proves the equipment's ability to recover and/or recycle refrigerant according to the SAE J standards adopted into the appendices at 40 CFR Part 82, Subpart B. Certification standards are particular to the type of equipment used and refrigerant being recovered.

Since EPA does not have the capabilities to test all refrigerant handling equipment on a national scale, the Agency relies on approved laboratories to test equipment. Currently, Underwriters Laboratories (UL) and Intertek/ETL Testing Laboratories (ETL) certify equipment on a voluntary basis. The Agency established an approval system at 40 CFR 82.38 to evaluate procedures of laboratories that may request approval in the future. Information submitted by the laboratories must include documentation of their capacity to accurately test equipment, an absence of a conflict of interest or financial benefit based on test results, and agreement to allow EPA access to verify information. SPD uses the information provided by independent laboratories to evaluate their capacity to properly test refrigerant handling equipment. The Agency has required only the submission of information that will enable it to ensure that all approved laboratories can test equipment under Agency standards and the adopted SAE J standards. Given the 20-year history of the program, EPA considers it unlikely that new organizations will submit for approval to become an approved laboratory.

#### *ii) Technician Certification Programs*

Technicians must pass a test at the completion of a certification program in order to perform any service or repair on MVACs and in order to use the approved equipment as stipulated in Section 609 and 40 CFR 82.34, 82.40. Technician certification programs must submit verification to EPA of their compliance with standards set forth in 40 CFR 82.40. SPD uses certification program information to ensure that Agency standards are met, and that they are at least as stringent as the SAE J standards of SAE International. The information requested is used by EPA to guarantee a degree of uniformity in the testing programs for motor vehicle service technicians.

Because of the rapidly changing nature of the motor vehicle air conditioning market, EPA requires that technician certification programs conduct internal reviews and update their program periodically. By requiring a written summary of the review and any program changes to be reported to EPA every two years, the Agency ensures the accuracy of the information, and

maintains parity among testing programs.

*iii) Refrigerant Sent Off-site*

EPA requires service establishments to record the name and address of any off-site facility which is reclaiming refrigerant, per 40 CFR 82.42 (b)(1). This information is used to verify compliance with the motor vehicle air conditioning recycling program.

*iv) Purchases of Small Cans*

Distributors who purchase small containers of refrigerant must be properly trained and certified according to the standards set forth in 40 CFR 82.40, unless the purchaser provides a written statement verifying that the small containers were purchased for resale only. The seller may keep the initial statement from a distributor and update the file with the amounts of refrigerant purchased in the form of small containers. These records are used to ensure that small containers of refrigerant are not available for non-certified technicians. By requiring only minor additions to the existing invoice procedures, the Agency has ensured total compliance with Section 609.

### **3. Non-duplication, Consultations, and Other Collection Criteria**

a) Non-Duplication

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

b) Public Notice Required Prior to ICR Submission to OMB

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the Federal Register (83 FR 26283) on June 6, 2018 soliciting public comments for a 60-day period. EPA received one comment that is not relevant to this ICR or any related rulemaking, so EPA is not providing a specific response. EPA will issue a second notice soliciting public comments for a 30-day period concurrent with the submission of this renewal to OMB.

c) Consultations

In developing the regulations under the Act, EPA established an advisory council for issues relating to stratospheric ozone. The Stratospheric Ozone Protection Advisory Council (STOPAC) membership included representatives from affected industries, environmental interest groups, and academics in related fields. Within STOPAC, subcommittees were formed to look at the more detailed issues. The subcommittee on motor vehicle air conditioning met several times, and discussed all aspects of the proposed regulations for Section 609 of the Act.

To update this ICR, prior to the publication of the second public notice in the Federal Register, EPA consulted with technician training and certification programs, including the Mobile Air Conditioning Society (MACS) Worldwide, the National Institute for Automotive Service Excellence (ASE) and the Universal Technical Institute (UTI). EPA reviewed estimates of the number of new certifications that may be issued annually provided by the technician

certification programs.

EPA believes the comments received in response to the request for consultation are consistent with the proposal put forward in the June 6, 2018, Federal Register notice. Therefore, EPA has not changed the conclusions of this Supporting Statement.

d) Effects of Less Frequent Collection

The equipment certification time table was established by Congress in Section 609. Since the equipment certification submission is a one-time occurrence, a less frequent collection of this information would make it impossible to comply with Section 609.

Verifications of applications for technician certification programs and independent standards testing organizations are required to be submitted to EPA under Section 609 of the Act. The review is a one-time occurrence and must take place to allow the Agency to approve programs under the Act. EPA must also review periodically updated materials, submitted in accordance with the requirements of Section 609.

e) General Guidelines

This ICR does not exceed any of the OMB guidelines and regulations under 5 CFR 1320.5(d) (2).

f) Confidentiality

This ICR does not request information of a confidential nature.

g) Sensitive Questions

No questions concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private are included in this information collection.

#### **4. The Respondents and the Information Requested**

a) Respondents / NAICS Codes

The following is a list of NAICS codes for organizations potentially affected by the information requirements covered under this ICR. It is meant to include any establishment that may service or maintain motor vehicle air conditioners, including:

- 4411: Automobile Dealers
- 4413: Automotive Parts, Accessories, and Tire Stores
- 44711: Gasoline Stations with Convenience Stores
- 8111: Automotive Repair and Maintenance
- 811198: All Other Automotive Repair and Maintenance

Other affected groups include:

- Independent Standards Testing Organizations
- Organizations with Technician Certification Programs

b) Information Requested

*i) Data Items, including Recordkeeping Requirements*

All entities that service motor vehicle air conditioners must send to EPA, on a one-time basis, certification of ownership of an appropriate MVAC refrigerant handling device. This certification must include the name of the purchaser of the equipment, address of the establishment where the equipment will be located, name of equipment manufacturer, model number, date of manufacture, and serial number. The statement must be signed by the owner of the equipment or other responsible officer, and must indicate that the equipment will be properly used in servicing motor vehicle air conditioners, and that each individual authorized by the purchaser to perform service is properly trained and certified.

Independent laboratory testing of refrigerant handling equipment is designed to ensure that the equipment is capable of safely meeting the standards set forth by EPA in appendices to 40 CFR Part 82, Subpart B. To establish a degree of uniformity to the equipment certification programs, EPA requires organizations to submit applications documenting: the equipment used for equipment testing; the expertise and technical experience of their personnel; thorough knowledge of the standards in the appendices to 40 CFR Part 82, Subpart B; test procedures to be used and the rationale for them; absence of a conflict of interest or financial benefit based on test results; and agreement to allow EPA access to verify information. Specific reporting requirements may include: equipment ability to remove moisture, oil, and non-condensable gases from refrigerant, and a list of testing equipment used.

Technician certification programs interested in certifying technicians are required to document that their program meets EPA standards. An acceptable program includes the following components: adequate training through on-the-job or on-site instructional training, or self-study; a test that effectively covers all relevant standards dealing with the servicing and repair of motor vehicle air conditioners, anticipated future technological developments, the regulatory requirements imposed by EPA under Section 609 of the Act, the environmental consequences of the release of refrigerant during the servicing and repair of motor vehicle air conditioners, and the adverse effects of stratospheric ozone depletion; a test grader who receives no benefit based on test results; means of identifying the individual taking the test; the measures taken at the test site to ensure that the tests are completed honestly by each technician; individual proof of certification in the form of a certificate or card and unique certification number.

Certification programs are required to conduct a periodic review of their test material and submit to EPA a written program review summary and any material changes every two years.

Service establishments that own approved refrigerant handling equipment and send used refrigerant off-site for recycling or reclamation must record the facility name and address to which any refrigerant is sent. In addition, the seller of small containers to an uncertified

purchaser must be provided with a written statement that the containers are for resale only. The statement must also contain the purchaser's name and address. Finally, any person who owns equipment must retain records demonstrating that all technicians authorized to operate the equipment are certified pursuant to the Clean Air Act. All of these records must be kept on-site for a minimum of three years.

*ii) Respondent Activities*

All Entities That Service Motor Vehicle Air Conditioners

- One-Time Equipment and User Certification Forms:
  - Compile documentation for a certification that states the following: name of the purchaser of the equipment, address of the establishment where the equipment will be located, name of equipment manufacturer, model number, date of manufacture, and serial number. The statement must be signed by the owner of the equipment or other responsible officer, and indicate that the equipment will be properly used in servicing motor vehicle air conditioners and that each individual authorized by the purchaser to perform service is properly trained and certified. Prepare and submit completed certification to the appropriate EPA Regional Office.
- Records of Certified Technicians:
  - Maintain records on-site, for a minimum of three years, demonstrating that all equipment users are properly trained and certified.
- Records of Refrigerant Sent Off-site:
  - Record and file the facility address to which any refrigerant is sent for off-site reclamation or recycling. Recordkeeping is required for a minimum of three years.
- Records of Class I or Class II Refrigerant in Small Containers Sold for Re-Sale:
  - Verify that purchaser is properly trained and certified.
  - Compile, file, and keep for a minimum of three years written statements from uncertified purchasers verifying their intent to only resell the small containers of refrigerant.

Independent Standards Testing Organizations

- New Independent Standards Testing Organization Certification
  - Research SAE J standards on MVAC refrigerant handling equipment.
  - Compile test methodology, a list of required equipment, and other information regarding the SAE standards for the application to EPA.
  - Prepare and submit application to EPA that documents capacity to accurately test whether refrigerant handling equipment complies with the applicable standards, an absence of conflict of interest or financial benefit

based on test results and an agreement to allow EPA access to verify information to ensure that the testing program fulfills the applicable SAE J standards, adopted in the appendices at 40 CFR Part 82, Subpart B, for recycling and recovery equipment.

#### Substantially Identical Equipment Owners or Manufacturers

- Locate information that will verify that the equipment can perform to the applicable SAE J standards, including process flow sheets and a list of components.
- Compile supporting information and submit it to EPA.

#### Technician Certification Programs

- New Technician Certification Program Certification:
  - Compile documents and submit to EPA for verification that training program meets EPA requirements.
- Technician Certification Program Review:
  - Conduct periodic program reviews.
  - Prepare and submit summary of program review to EPA every two years.

### **5. The Information Collected: Agency Activities, Collection Methodology, and Information Management**

#### a) Agency Activities

- One-Time Equipment and User Certification Forms:
  - Review and store certification applications and supporting documents from all entities that have purchased approved refrigerant handling equipment.
- Records of Certified Technicians:
  - No Agency action required.
- Records of Refrigerant Sent Off-site:
  - No Agency action required.
- Records of Refrigerant Sold for Re-Sale:
  - No Agency action required.
- New Independent Standards Testing Organization Certification:
  - Review applications from independent labs that request approval to certify refrigerant handling equipment.
- New Technician Certification Program Certification:
  - Review applications from new technician certification programs.



- Technician Certification Program Review:
  - Review program updates.

#### b) Collection Methodology and Management

SPD and the ten EPA regional offices have planned and allocated resources for the efficient and effective management and use of this information. The information submitted by each service establishment is maintained by the EPA regional offices.

Independent standards testing organizations must submit to the Agency an application documenting their capacity to accurately test whether refrigerant handling equipment complies with the applicable standards, an absence of conflict of interest or financial benefit based on test results, and an agreement to allow EPA access to verify information. The Agency examines the submitted test procedures for their ability to meet the SAE standards as specified in Section 609 of the Act. These applications may be submitted manually or electronically, as long as they are made available for Agency review.

The substantially identical equipment approval process is no longer applicable for refrigerant handling equipment manufactured prior to the proposal of refrigerant equipment handling regulations. The substantially identical equipment regulation only relates to equipment initially purchased prior to March 6, 1996. Because the average lifetime of such equipment is roughly 7 years, all such equipment is obsolete today. The documentation requirements for this approval process have been removed from this ICR.

Technician certification programs must submit to the Agency a verification of their compliance with EPA regulations for review and approval by SPD. Program materials include, but are not limited to: videos, scripts, manuals, booklets, presentations, and software or other forms of electronic information. Testing of technicians may be performed either manually or electronically. The certification programs and their tests are kept on file at EPA for reference.

The Agency has determined that periodic on-site inspection is the most effective method to ensure compliance with Section 609. Records should be kept at the location where service involving refrigerant is performed or where small containers of refrigerant are distributed for resale.

#### c) Small Entity Flexibility

The Act does not require technician training and certification programs to be developed, only that once developed they be submitted to EPA. EPA expects around one technician certification program and no independent equipment standard testing organizations to apply for approval each year. The requirement to submit the program application for Agency approval is not burdensome and is not expected to prevent small entities from developing programs.

The substantially identical determination provided a method for examining equipment sold before the regulations were proposed and that had not been certified by an approved independent laboratory. This provision would have benefited small entities that may have purchased recycling or recover equipment in a good faith effort to recover refrigerant prior to the regulatory mandate.

The name and address of the refrigerant handling facility to which refrigerant is sent by an establishment with recovery-only capabilities is a standard part of existing recordkeeping procedures for business transactions. The regulations regarding records maintained by persons who sell small containers of refrigerant solely require that the resale-only statement be added into invoicing procedures for sales to uncertified purchasers.

#### d) Collection Schedule

All entities operating at the time the regulations were introduced were required to submit certification forms to EPA by January 1, 1993. Today, only new shops or shops changing ownership are responsible for certification. The certification for refrigerant handling equipment is intended as a one-time information request per entity.

After the initial EPA approval, technician training programs must review their programs periodically to account for technological developments. A summary of the program review and any changes must be submitted to EPA every two years.

### **6. Estimating the Burden and Cost of the Collection**

#### a) Estimating Respondent Burden

The basis of the analysis is the identification of the principal steps involved in complying with EPA recordkeeping and reporting requirements and the estimated burden associated with each step. The burden has been estimated by estimating the number of times the step may be required to be undertaken by the regulations and the number of hours required to complete each step. Appendix 1 presents the estimated annual respondent burden and costs for information collection activities associated with Section 609 of the Act.

Time required for completion of each activity is derived from the estimates in the previous ICR.

The maintenance of records of technician certification (of photocopying and filing the technician's certification card) is estimated to require 0.067 clerical work hours (4 minutes) per certification, which is a decrease from the previous ICR. The time allotted to this activity in the last ICR was 0.08 hours per certification; this estimate was now deemed too high.

One-time equipment and user certification for compilation, preparation, and submission is estimated to require 0.17 hours (10 minutes) per establishment, which remain unchanged from the previous ICR. Generally, this one-time certification is submitted by a new motor vehicle service facility, or by first-time refrigerant handling equipment owners or lessees, or when there has been a change in ownership of an existing service facility, consistent with the recordkeeping and reporting requirements in 40 CFR 82.42. This labor burden includes completion and mailing of a prepared certification statement. The statement requires information on establishment name, name of the equipment owner or lessee, address, and telephone number, as well as equipment manufacturer, model number, serial number, and year.

EPA has allotted 1.5 hours per establishment to conduct the biannual reviews, and 0.5 hours

has been allotted per establishment to prepare and submit the summary, which are unchanged from the time allotted in the previous ICR.

Minimal records need to be developed by industry establishments, and these records can be stored as hard copies; there is no need or requirement for the creation (or maintenance) of a database system, though EPA recognizes that the movement toward electronic recordkeeping may be more efficient for certain establishments. Therefore, no additional hours or costs are required for these activities.

b) Estimating Respondent Costs

*i) Estimating Labor Costs*

Respondent labor costs (hourly rate plus overhead) have been updated from the previous ICR estimates by using current data from the Bureau of Labor Statistics (BLS, 2017) for the “Motor Vehicles and Parts Dealers” industry.<sup>1</sup> Median hourly wages are multiplied by a factor of 2.1 to reflect the estimated additional costs for overhead. General recordkeeping tasks are assigned to administrative assistants, whereas preparations of applications and reports are assigned to managers. The following job characterizations were used in Table 1:

- General and Operations Manager (Managerial):  $\$42.95/\text{hr} \times 2.1 = \$90.20$
- Automotive Service Technicians and Mechanics (Technical):  $\$19.51/\text{hr} \times 2.1 = \$40.97$
- Executive Secretaries and Administrative Assistants (Clerical):  $\$27.34/\text{hr} \times 2.1 = \$57.41$

**Table 1. Average Hourly Establishment Labor Costs**

Managerial	Technical	Clerical
\$90.20	\$40.97	\$57.41

*ii) Estimating Capital and Operations and Maintenance Costs*

The Agency estimates that there are no capital/operations and maintenance costs associated with the requirements of Section 609, and therefore, with the renewal of this information collection request.

c) Estimating Agency Burden and Cost

The basis of this analysis is the identification of the steps involved in implementing and operating the system. The costs associated with each step have been estimated by identifying the number of times the step will be undertaken, the number of hours required to complete each step, and the total dollar cost. Appendix 2 presents the estimated Agency burden hours and costs associated with the information collection activities for this ICR. Agency labor costs are based on the January 2018 GS Salary Schedule for the locality pay area of Washington-Baltimore-Northern Virginia, DC-MD-PA-WV (OPM, 2018), which are multiplied by 1.6, the standard

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<sup>1</sup> Relevant occupation codes include: General and Operations Manager (11-1021), Executive Secretaries and Administrative Assistants (43-6011), and Automotive Service Technicians and Mechanics (49-3023).

government benefits multiplier. See Table 2 for EPA estimates of average hourly labor costs for managerial and clerical staff, whose wage estimates are based on GS 12 step 2, and GS 7 step 2 hourly rates respectively.

Wage estimates are based on the following characterizations of occupations:

- GS 12 Step 2 - Managerial: \$40.38/hr x 1.6 = \$64.61/hr
- GS 7 Step 2 – Clerical (43-4199): \$22.76/hr x 1.6 = \$36.42/hr

**Table 2. Average Hourly Agency Labor Costs**

Managerial	Clerical
\$64.61	\$36.42

Estimates of burden hours are based on assumptions that filing and recording information will take very little time. Specific estimates are detailed in Appendix 2. No additional hours or costs will be incurred for preparation or development of a recordkeeping database. For the establishment activities that simply require on-site recordkeeping and for those that are currently not applicable to any establishments, EPA has no correlated burden.

d) Estimating the Respondent Universe and Total Burden and Costs

According to data from the U.S. Census Bureau, there were 158,849 establishments in the “Automotive Repair and Maintenance” sector in 2015 (U.S. Census Bureau, 2015).<sup>2</sup> According to data from the BLS (2018a; 2018b), there were 228,929 private establishments in the “Repair and Maintenance” sector and 117,234 in the “Motor Vehicle Repairs and Parts Dealer” sector in the third quarter of 2017.<sup>3</sup> These numbers represent an approximate 1% increase in the number of establishments in those sectors relative to 2015. As such, the Agency assumes that the number of motor vehicle repair establishments (which are a subset of the two larger sectors) increased by 1% since 2015, for a total of approximately 160,400 establishments.

An average of 100 equipment certification submissions are received and processed by each EPA Regional office each year. Therefore, it is estimated that 1,000 establishments will compile and submit one-time certification submissions to EPA on an annual basis.

The 2015 ICR estimated that 50,000 new MVAC technicians are certified each year based on data collected in March 2012 from 6 out of 19 technician certification centers. Information recently provided by the largest technician certification program and information gathered during the consultations suggest that the number of certifications has declined. EPA believes that approximately 40,000 new technicians may be certified each year. Assuming that MVAC service establishments will hire these newly certified technicians and maintain records demonstrating their certification, this ICR estimates there will be 40,000 records regarding certified technicians

<sup>2</sup> Based on the 2012 NAICS code 8111 “Automotive Repair and Maintenance.”

<sup>3</sup> The “Repair and Maintenance” sector (NAICS 811) encompasses repair and maintenance of automobiles (8111), electronic and precision equipment (8112), commercial and industrial machinery and equipment (8113), and personal and household goods (8114). The “Motor Vehicle and Parts Dealers” sector (NAICS 441) encompasses automobile dealers (4411), other motor vehicle dealers (4412), and automotive parts, accessories, and tire stores (4413).

using proper refrigerant handling equipment maintained each year.

In the previous ICR, EPA estimated that 3% of servicing establishments send refrigerant off-site for reclamation, and the Agency is retaining this assumption. Based on the estimated total number of currently operating servicing establishments in the United States (160,400), 4,812 facilities are estimated to keep record and file off-site facility address of refrigerant sent for reclamation.

EPA estimates that there are 69 annual purchases of small class I or class II refrigerant containers made by uncertified purchasers for resale only. This number is reduced from the estimate of 137 purchases in the 2015 ICR renewal, because EPA estimates that there has been at least a 50% reduction in the CFC-12 vehicle fleet since 2015.

There are currently two independent standards testing organizations, and it is unlikely that any others will apply for approval. Additionally, no significantly identical equipment is expected to be submitted to the Agency for review.

There are currently 19 technician certification programs that must submit program reviews every other year. It is estimated that EPA will review one new program per year and nine program updates per year (i.e., one update for each program every other year).

#### e) Bottom Line Burden Hours and Cost Tables

##### *i) Respondent Tally*

- o Total Annual Burden Hours: 4,130.25 hrs.
- o Total Annual Cost: \$218,008.86

##### *ii) The Agency Tally*

- o Total Annual Burden Hours: 92.50 hrs.
- o Total Annual Cost: \$3,720.88

##### *iii) Variations in the Annual Bottom Line*

Changes to the annual bottom line are due to a more accurate estimate in hourly wages and number of reporting establishments, as well as a shift in the time requirements. See below for a more complete discussion of these changes.

#### f) Reasons for Change in Burden

The previously approved ICR's supporting statement estimated a total annual respondent burden of 4,163.87 hours. This ICR estimates a total annual burden of 4,130.25 hours. Hence, there is a decrease of 33.62 hours since the previously approved ICR. This change can be attributed to the following factors.

- Since the previous ICR renewal, EPA estimates that the total number of establishments is 160,400, based on recently released data on the number of motor vehicle establishments from the U.S. Census Bureau. The estimate used for number

of establishments in the previous ICR renewal (4,100) was inadvertently assumed.

- EPA estimates that an average of 100 equipment certification submissions are received and processed by each of ten EPA Regional office every year. This results in a total of 1,000 establishments that will compile and submit one-time certification submissions to EPA on an annual basis. As a result, the estimate for the number of new approved refrigerant handling equipment certification submissions has increased from 82 to 1,000.
- EPA estimates there will be 40,000 records regarding certified technicians using proper refrigerant handling equipment maintained each year, a decrease from the 50,000 estimated in the previous ICR.
- EPA estimates the maintenance of technician certification records to require 0.067 clerical work hours per certification, a decrease from 0.08 hours in the previous ICR, recognizing that the movement toward electronic recordkeeping may be more efficient.
- As in the previous ICR renewal, EPA assumed that 3% of establishments send refrigerants off-site and need to record the address of the off-site facility. The estimate for the number of establishments that send refrigerants off-site increased from 120 to 4,812 to reflect a higher, more accurate, number of motor vehicle establishments in the United States.
- EPA estimates that there are 69 annual purchases of small class I or class II refrigerant containers made by uncertified purchasers for resale only. This number is reduced from the estimate of 137 purchases in the 2015 ICR renewal because EPA estimates that there has been at least a 50% reduction in the CFC-12 vehicle fleet since 2015.
- The number of technician certification programs, which are required to conduct biannual program reviews and submit documentation to EPA, increased from 18 to 19 since the previous ICR.

#### g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 4,130.25 hours, or less than one hour per response. 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 Number EPA-HQ-OAR-2018-0118, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. 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 Air and Radiation 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 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, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2018-0118 and OMB Control Number 2060-0247 in any correspondence.

## References

Bureau of Labor Statistics (BLS). 2018a. Industries at a Glance -- Repair and Maintenance: NAICS 811. Available at: <https://www.bls.gov/iag/tgs/iag811.htm>

Bureau of Labor Statistics (BLS). 2018b. Industries at a Glance -- Motor Vehicles and Parts Dealers: NAICS 441. Available at: <https://www.bls.gov/iag/tgs/iag441.htm>

Bureau of Labor Statistics (BLS). 2017. May 2017 National Industry-Specific Occupational Employment and Wage Estimates: NAICS 441000 -- Motor Vehicle Parts and Dealers. Available at: [https://www.bls.gov/oes/current/naics3\\_441000.htm](https://www.bls.gov/oes/current/naics3_441000.htm)

Office of Personnel Management (OPM). 2018. Salary Table 2018-DCB for the Locality Pay Area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA. Effective January 2018.

U.S. Census Bureau. 2015. 2015 County Business Patterns. Number of Firms, Number of Establishments, Employment, and Annual Payroll by Enterprise Employment Size for the United States, All Industries: 2015. Released September 29, 2017. Available at: <https://www.census.gov/data/tables/2015/econ/susb/2015-susb-annual.html>

## Appendix 1: Industry Reporting Burden

INFORMATION COLLECTION ACTIVITY	Description	Number of Responses per Year	Labor Hours per Response				Total Hours per Year	Total Labor Costs per Response	Total Cost per Year
			Manager	Technicians/ Mechanics	Secretaries/ Assistants	Total			
			\$90.20	\$40.97	\$57.41				
<b>ENTITIES THAT SERVICE MVACs</b>									
One-Time Equipment and User Certification Statements	Compile, Prepare, and Submit Certification	1,000			0.17	0.17	170	\$9.76	\$9,760.38
Records of Technician Certification	Maintain Records On-Site of Certification of Technicians	40,000			0.067	0.067	2,680	\$3.85	\$153,869.52
Records of Refrigerant Sent Off-Site	Record and file off-site facility address	4,812		0.25		0.25	1,203	\$10.24	\$49,288.11
Records of CFC-12 Refrigerant Sold	Verify certification of purchaser	0							
	Obtain and file written statements from purchaser verifying intent to only resell small containers	69			0.25	0.25	17.25	\$14.35	\$990.39
<i>Subtotal</i>		<i>45,881</i>	<i>0.00</i>	<i>0.25</i>	<i>0.49</i>	<i>0.74</i>	<i>4,070.25</i>	<i>\$38.20</i>	<i>\$213,908.40</i>
<b>INDEPENDENT STANDARDS TESTING ORGANIZATIONS</b>									
New Independent Standards Testing Organization Certification	Research SAE standards on MVAC recovery equipment	0							
	Compile information for application to EPA	0							
	Prepare and submit application to EPA	0							
<i>Subtotal</i>		<i>0</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>	<i>\$0</i>
<b>TECHNICIAN CERTIFICATION PROGRAMS</b>									
New Technician Certification	Compile documents and submit to EPA for	1			40.00	40.00	40.00	\$2,296.56	\$2,296.56



INFORMATION COLLECTION ACTIVITY	Description	Number of Responses per Year	Labor Hours per Response				Total Hours per Year	Total Labor Costs per Response	Total Cost per Year
			Manager	Technicians/ Mechanics	Secretaries/ Assistants	Total			
			\$90.20	\$40.97	\$57.41				
Program Certification	verification of program								
Technician Certification Program Review	Conduct periodic program reviews	10	1.50			1.50	15.00	\$135.29	\$1,352.93
	Prepare and Submit summary of program review to EPA every two years	10	0.50			0.50	5.00	\$45.10	\$450.98
<i>Subtotal</i>		<i>21</i>	<i>2.00</i>	<i>0.00</i>	<i>40.00</i>	<i>42.00</i>	<i>60.00</i>	<i>\$2,476.95</i>	<i>\$4,100.46</i>
<b>ANNUAL TOTAL</b>		<b>45,902</b>	<b>2.00</b>	<b>0.25</b>	<b>40.49</b>	<b>42.74</b>	<b>4,130.25</b>	<b>\$2,515.15</b>	<b>\$218,008.86</b>

## Appendix 2: Agency Reporting Burden

INFORMATION COLLECTION ACTIVITY	Description	Number of Responses per Year	Labor Hours per Response			Total Hours/Year	Costs per Response	Total Cost per Year
			Manager	Clerical	Total			
			\$64.61	\$36.42				
One-Time Equipment and User Certification Statements	Review and file applications	1,000		0.08	0.08	80.00	\$2.91	\$2,913.28
New Independent Standards Testing Organization Certification	Review applications from testing organizations who request to certify equipment	0						
New Technician Certification Program Certification	Review applications from new technician certification programs	1	10.00		10.00	10.00	\$646.08	\$646.08
Technician Certification Program Review	Review summaries of certification program updates every two years	10	0.25		0.25	2.50	\$16.15	\$161.52
<b>Annual Total</b>		<b>1,011</b>	<b>10.25</b>	<b>0.08</b>	<b>10.33</b>	<b>92.50</b>		<b>\$3,720.88</b>