Quarterly Reports	Number of unique facilities/companies	
Producer		6
Imports		61
Exports		16
Reclamation		20
Fire Suppression		3

One-Time Reports	Number of unique facilities/companies	
Destruction		6
Transformation		2
Process Agent		2
Reclamation		

As Needed Reports	Needed Reports Number of unique facilities/companies	
Transfers	6	13
Conferrals	23	47
RACA	5	25
Petitions	2	16
Transhipments	1	2

Source: HFC Submission Summary Report (6.16.22)

Months of Activity	Average Reports/Company/Year
6	4
6	4
6	10
3	32
6	4

# **Responent Burden Assumptions**

Respondent Type	Acitvity
	Submit one-time producer report
	Submit quarterly report
	Submit annual inventory report (part of quarterly report)
	Maintain records
IIIC D	Register with certification ID system
HFC Producer	Enter data into certification ID system
	Submit annual HFC-23 emissions report
	Submit HFC-23 proof of destruction
	Provide certification to third party (conferrer)
	Provide certification to third party (exporter)
	Submit quarterly report
	Submit annual inventory report (part of quarterly report)
	Maintain records
	Register with certification ID system
	Enter data into certification ID system
	Petition to import HFCs for transformation/destruction
	Petition to import used HFCs for destruction
HFC Importer	Petition to import HFCs for laboratory testing with eventual destruction
	Submit ACE report
	Submit proof of destruction of used imports
	Maintain records on used imports for destruction
	Provide certification to third party (conferrer)
	Provide certification to third party (exporter)
	Submit Importer of Record annual report
	Submit notification of transhipments
Testing Laboratories	Submit notification of delivery to destruction facility
HFC Aggregator	Maintain records
Vessel Owner	Maintain records
	Submit quarterly report
LIDO D	Submit annual inventory report (part of quarterly report)
HFC Exporter	Submit request for additional consumption allowances
	Submit notification of transhipments
	Register with certification ID system
	Enter data into certification ID system
	Submit conferral request
HFC Suppliers	Provide certification to third party (conferee)
	Provide certification to third party (conferrer)
	Maintain records
	Submit one-time report
	Submit annual second party report
	L

HFC Destoyer	Maintain records
	Provide destruction verification to third party
	Provide proof of destruction to third party
	Submit one-time report
HIPO TO	Submit annual second party report
HFC Transformer	Maintain records
	Provide transformation verification to third party
LIEC Durance A gent Lies	Submit one-time report
HFC Process Agent Use	Submit annual report
	Submit one-time report
	Submit quarterly report
LIEC De eleiment	Submit annual inventory report (part of quarterly report)
HFC Reclaimers	Maintain records
	Register with certification ID system
	Enter data into certification ID system
	Register with certification ID system
HFC Fillers and Packagers	Enter data into certification ID system
	Maintain records
	Submit quarterly report
	Submit annual inventory report (part of quarterly report)
HFC Fire Suppression Agent Recyclers	Maintain records
recycles	Register with certification ID system
	Enter data into certification ID system
	Submit inter-company transfer request
HFC Transfers	Submit request to transfer from a person in a foreign country
THE Transfers	Submit request to transfer to a person in a foreign country
	Submit request to sell/transfer HFCs produced/imported with application-specific allowances
	Submit biannual report
	Submit annual report (part of biannual report)
Application-Specific Allowance Holders	Submit conferral request
	Provide certification to third party (conferee)
	Maintain records
Third Party Audits	Submit annual audit report

Unique number of Respondents

Technical Hours per Response	Clerical Hours per Response	Responses per Year	Maximum Respondents per Acitvity
100	0	1	1
6	0	4	6
40	0	1	6
0	100	1	6
0.50	0	1	6
2	0	48	6
12	0	1	4
0.25	0	2	4
2	0	1	2
2	0	1	2
6	0	4	61
10	0	1	61
0	100	1	61
0.50	0	1	61
2	0	48	61
2	0	32	2
6	0	6	2
6	0	48	3
0.25	0	123	61
0.25	0	6	2
0	20	1	2
2	0	1	2
2	0	1	2
2	0	1	61
1	0	4	2
2	0	48	3
0	20	1	5
0	20	1	100
6	0	4	16
10	0	1	16
8	0	10	5
1	0	4	2
0.50	0	1	10,000
0.003	0	891	10,000
6	0	2	4
2	0	2	4
2	0	4	4
0	20	1	4
100	0	1	1
4	0	1	6

0	20	1	6
2	0	1	6
2	0	1	12
100	0	1	1
4	0	1	2
0	20	1	2
2	0	1	2
100	0	1	1
6	0	1	2
40	0	1	1
9.4	0	4	20
10	0	1	20
0	40	1	20
0.50	0	1	20
0.006	0	116,471	20
0.50	0	1	50
0.006	0	116,471	50
0	20	1	50
9.4	0	4	3
10.0	0	1	3
0	40	1	3
0.50	0	1	3
0.006	0	116,471	3
6	0	2	12
6	0	1	1
6	0	1	1
6	0	1	5
6	0	2	42
6	0	1	50
6	0	2	40
2	0	2	40
0	80	1	42
40	0	1	129
			10,195

#### **Basis for Assumptions**

Assumes up to one response per year to account for revisions or new production facilities.

Number of facilities based on HFC Q1 2022 report submissions

Number of facilities based on HFC Q1 2022 report submissions

Number of facilities based on HFC Q1 2022 report submissions

Number of facilities based on HFC Q1 2022 report submissions

See 'Certification ID Respondent Burden Assumptions' table

Burden estimate for reporting to eGGRT under subpart O from GHGRP ICR 2019 renewal; Respndents based on eGGRT subpart O reporting

Based on second party transformation and destruction verification assumption

Based on 2022 HRACA submissions through June 2022

Number of companies based on HFC Q1 2022 report submissions

Number of companies based on HFC Q1 2022 report submissions

Number of companies based on HFC Q1 2022 report submissions

Number of companies based on HFC Q1 2022 report submissions

See 'Certification ID Respondent Burden Assumptions' table

Activity based on HFC 2022 report submissions from mid-March through mid-June

Activity based on 2022 DPETI submissions through June 2022.

Based on input from EPA

7500 unique shipments based on historical ACE data; Number of companies based on HFC Q1 2022 report submissions

Based on second party transformation and destruction verification assumption

Based on 2022 HRACA submissions through June 2022

Number of companies based on HFC Q1 2022 report submissions

Based on 2022 HSHIP submissions through June 2022

Based on input from EPA

Provided by EPA

Provided by EPA

Number of companies based on HFC Q1 2022 report submissions

Number of companies based on HFC Q1 2022 report submissions

Activity based on 2022 HRACA submissions through June 2022.

Based on 2022 HSHIP submissions through June 2022

2x HARDI wholesaler/distributor locations

2x HARDI wholesaler/distributor locations; See 'Certification ID Respondent Burden Assumptions' table

Based on HCONF submissions through June 2022

Assumes up to one response per year to account for revisions or new destruction facilities.

Number of facilities based on HFC 2022 one-time report submissions

Number of facilities based on HFC 2022 one-time report submissions

Number of facilities based on HFC 2022 one-time report submissions

Number of petitions to import HFCs for destruction

Assumes up to one response per year to account for revisions or new transformation facilities.

Number of facilities based on HFC 2022 one-time report submissions

Number of facilities based on HFC 2022 one-time report submissions

Number of facilities based on HFC 2022 one-time report submissions

Assumes up to one response per year to account for revisions or new process agent end-users

Number of facilities based on HFC 2022 one-time report submissions

Assumes up to one response per year to account for revisions or new reclaimers.

Burden for annual activity report from Section 608 ICR, number of companies based on HFC Q1 2022 report submissions

Number of companies based on HFC Q1 2022 report submissions

Number of companies based on HFC Q1 2022 report submissions

Number of companies based on HFC Q1 2022 report submissions

See 'Certification ID Respondent Burden Assumptions' table

Provided by EPA

See 'Certification ID Respondent Burden Assumptions' table

Burden for annual activity report from Section 608 ICR, number of respondents based on HFC Q1 2022 report submissions

Number of respondents based on HFC Q1 2022 report submissions

Number of respondents based on HFC Q1 2022 report submissions

Number of respondents based on HFC Q1 2022 report submissions

See 'Certification ID Respondent Burden Assumptions' table

Activity based on 2022 HTRAN submissions through June 2022.

ICF estimate

ICF estimate

ICF estimate

Based on 2022 allowance recipients

Based on 2022 allowance recipients plus 8 to account for new applicants

Based on application-specific allowance holders minus companies with consumption allowances; based on HCONF submissions through June 2022

Based on 2022 allowance recipients

Importers + producers + reclaimers + application specific allowance holders

aggregators + producers + importers + suppliers + reclaimers+ destroyers + transformers + fillers/packagers + application specific allowance holders (assur other respondents overlap with these activities) Respondents per Year

Respondents per Year
Respondent Type
HFC Producer
HFC Importer
Testing Laboratories
HFC Aggregator
Vessel Owner
HFC Exporter
HFC Suppliers

HFC Destoyer
HFC Transformer
HFC Process Agent Use
HFC Reclaimers
HFC Fillers and Packagers
HFC Fire Suppression Agent Recyclers
HFC Transfers
Application-Specific Allowance Holders
Third Party Audits

Acitvity	Y1 (2024)	Y2 (2025)
Submit one-time producer report	1	1
Submit quarterly report	6	6
Submit annual inventory report (part of quarterly report)	6	6
Maintain records	6	6
Register with certification ID system	6	1
Enter data into certification ID system	2	6
Submit annual HFC-23 emissions report	4	4
Submit HFC-23 proof of destruction	4	4
Provide certification to third party (conferrer)	2	2
Provide certification to third party (exporter)	2	2
Submit quarterly report	61	61
Submit annual inventory report (part of quarterly report)	61	61
Maintain records	61	61
Register with certification ID system	61	1
Enter data into certification ID system	15	61
Petition to import HFCs for transformation/destruction	2	2
Petition to import used HFCs for destruction	2	2
Petition to import HFCs for laboratory testing with eventual destruction	3	3
Submit ACE report	61	61
Submit proof of destruction of used imports	2	2
Maintain records on used imports for destruction	2	2
Provide certification to third party (conferrer)	2	2
Provide certification to third party (exporter)	2	2
Submit Importer of Record annual report	61	61
Submit notification of transhipments	2	2
Submit notification of delivery to destruction facility	3	3
Maintain records	5	5
Maintain records	100	100
Submit quarterly report	16	16
Submit annual inventory report (part of quarterly report)	16	16
Submit request for additional consumption allowances	5	5
Submit notification of transhipments	2	2
Register with certification ID system	0	0
Enter data into certification ID system	0	0
Submit conferral request	4	4
Provide certification to third party (conferee)	4	4
Provide certification to third party (conferrer)	4	4
Maintain records	4	4
Submit one-time report	1	1
Submit annual second party report	6	6

M. C. C		
Maintain records	6	
Provide destruction verification to third party	6	6
Provide proof of destruction to third party	12	12
Submit one-time report	1	1
Submit annual second party report	2	2
Maintain records	2	2
Provide transformation verification to third party	2	2
Submit one-time report	1	1
Submit annual report	2	2
Submit one-time report	1	1
Submit quarterly report	20	20
Submit annual inventory report (part of quarterly report)	20	20
Maintain records	20	20
Register with certification ID system	0	20
Enter data into certification ID system	0	5
Register with certification ID system	0	50
Enter data into certification ID system	0	13
Maintain records	0	50
Submit quarterly report	3	3
Submit annual inventory report (part of quarterly report)	3	3
Maintain records	3	3
Register with certification ID system	0	3
Enter data into certification ID system	0	1
Submit inter-company transfer request	12	12
Submit request to transfer from a person in a foreign country	1	1
Submit request to transfer to a person in a foreign country	1	1
Submit request to sell/transfer HFCs produced/imported with application-specific allowances	5	5
Submit biannual report	42	42
Submit annual report (part of biannual report)	50	50
Submit conferral request	40	40
Provide certification to third party (conferee)	40	40
Maintain records	42	42
Submit annual audit report	129	129
	<u> </u>	

### **Certification ID Respondent Burden Assumptions**

Y3 (2026)

Respondent	Number of Cylinders	Cylinder Capacity (lbs)
Producer, importer	5,940,000	30
Reclaimer, filler/packager, fire suppression recycler	5,940,000	NA
Supplier	8,910,000	NA

## **Certification ID Respondent Percentage per Year**

	Certification ID Registra	
	Y1 (2024)	Y2 (2025)
Producer	100%	17%
Importer	100%	1.6%
Reclaimer	0%	100%
Filler/Packager	0%	100%
Fire Suppression Recycler	0%	100%
Supplier	0%	0%

		Certification ID Data En	
	Y1 (202	24)	Y2 (2025)
Producer		25%	100%
Importer		25%	100%
Reclaimer		0%	25%
Filler/Packager		0%	25%
Fire Suppression Recycler		0%	25%
Supplier		0%	0%

(	6
	6
1	2
	1
	2
	2
	2
	1
	2
	1
2	
2	0
2	0
	1
2	0
	1
5	0
5	
	3
	3
	3
	1
	3
1	2
	1
	1
	5
4	
5	_
4	_
4	
4	
12	9

Total HFC Quantity (lbs)	ISO Tank Capacity (lbs)	Number of ISO Tanks	Number of ID Generators/ Scanners	Responses/ Year/Respondent	Time per Response	Unit of Response Time	Time per Response (hours)
178,200,000	60,000	2,970	62	48	2	Hours	2.0
NA	NA	NA	51	116,471	20	Seconds	0.006
NA	NA	NA	10,000	891	10	Seconds	0.003

tion		
Y3 (202	26)	
	17%	
	1.6%	
	5%	
	2%	
	33%	
	100%	

ıtry	
	Y3 (2026)
	100%
	100%
	100%
	100%
	100%
	25%

## **Audit Costs**

Auditor Labor	Auditor Time	otal Cost to
Rate (\$)	(hours)	spondent (\$)
\$77.99	80	\$ 6,239.20

## **ACE Report Burden Assumptions**

Respondent	Total Annual Shipments
Importer	7,500

Total Respondents	Responses/Respondent	Time per Response	Unit of Response Time	Time per Response (hours)
61	123	15	Minutes	0.3

# Responent Burden

	Respondent Type
1	
1	
	HFC Producer
1	
1	
1	
	HFC Importer
4	Th'C importer
1	
1	
-	
	m
	Testing Laboratories
	HFC Aggregator
	Vessel Owner
1	
1	HFC Exporter
1	HFC Suppliers
	III C Suppliers
1	
1	
Т	

	HFC Destroyer
1	HFC Transformer
1	HFC Process Agent Use
1	HFC Reclaimers
	HFC Fillers and Packagers
L	HFC Fire Suppression Agent Recyclers
	HFC Transfers
L	Application-Specific Allowance Holders
	Third Party Audits
	Annual Total
ı	3 Year Total
	Annual Average

Respondent Burden	
	\$127.13
	\$100.23

Activity	Responses per Respondent per Year
Submit one-time producer report	1
Submit quarterly report	4
Submit annual inventory report (part of quarterly report)	1
Maintain records	1
Register with certification ID system	1
Enter data into certification ID system	48
Submit annual HFC-23 emissions report	1
Submit HFC-23 proof of destruction	2
Provide certification to third party (conferrer)	1
Provide certification to third party (exporter)	1
Submit quarterly report	4
Submit annual inventory report (part of quarterly report)	1
Maintain records	1
Register with certification ID system	1
Enter data into certification ID system	48
Petition to import HFCs for transformation/destruction	32
Petition to import used HFCs for destruction	6
Petition to import HFCs for laboratory testing with eventual destruction	48
Submit ACE report	123
Submit proof of destruction of used imports	6
Maintain records on used imports for destruction	1
Provide certification to third party (conferrer)	1
Provide certification to third party (exporter)	1
Submit Importer of Record annual report	1
Submit notification of transhipments	4
Submit notification of delivery to destruction facility	48
Maintain records	1
Maintain records	1
Submit quarterly report	4
Submit annual inventory report (part of quarterly report)	1
Submit request for additional consumption allowances	10
Submit notification of transhipments	4
Register with certification ID system	1
Enter data into certification ID system	891
Submit conferral request	2
Provide certification to third party (conferee)	2
Provide certification to third party (conferrer)	4
Maintain records	1
Submit one-time report	1
Submit annual second party report	1

Maintain records	1
Provide destruction verification to third party	1
Provide proof of destruction to third party	1
Submit one-time report	1
Submit annual second party report	1
Maintain records	1
Provide transformation verification to third party	1
Submit one-time report	1
Submit annual report	1
Submit one-time report	1
Submit quarterly report	4
Submit annual inventory report (part of quarterly report)	1
Maintain records	1
Register with certification ID system	1
Enter data into certification ID system	116,471
Register with certification ID system	1
Enter data into certification ID system	116,471
Maintain records	1
Submit quarterly report	4
Submit annual inventory report (part of quarterly report)	1
Maintain records	1
Register with certification ID system	1
Enter data into certification ID system	116,471
Submit inter-company transfer request	2
Submit request to transfer from a person in a foreign country	1
Submit request to transfer to a person in a foreign country	1
Submit request to sell/transfer HFCs produced/imported with application-specific allowances	1
Submit biannual report	2
Submit annual report (part of biannual report)	1
Submit conferral request	2
Provide certification to third party (conferee)	2
Maintain records	1
Submit annual audit report	1

Hourly Labor Rate - Technical Staff	
Hourly Labor Rate - Clerical Staff	

Tot	tivity per	ents per Ac Year	Responde	O&M Costs per Respondent	Labor Cost per Respondent per	Total Hours per Respondent	Clerical Hours per	Technical Hours per
Y1	<b>Y</b> 3	Y2	Y1	per Year	Year	per Year	Response	Response
1	1	1	1	\$0	\$12,713	100.0	0	100.0
24	6	6	6	\$0	\$3,051	24.0	0	6.0
6	6	6	6	\$0	\$5,085	40.0	0	40.0
6	6	6	6	\$50	\$10,023	100.0	100	0.0
6	1	1	6	\$0	\$64	0.5	0	0.5
72	6	6	2	\$0	\$12,180	95.8	0	2.0
4	4	4	4	\$50	\$1,526	12.0	0	12.0
8	4	4	4	\$0	\$64	0.5	0	0.3
2	2	2	2	\$0	\$254	2.0	0	2.0
2	2	2	2	\$0	\$254	2.0	0	2.0
244	61	61	61	\$0	\$3,051	24.0	0	6.0
61	61	61	61	\$0	\$1,271	10.0	0	10.0
61	61	61	61	\$50	\$10,023	100.0	100	0.0
61	1	1	61	\$0	\$64	0.5	0	0.5
731	61	61	15	\$0	\$12,180	95.8	0	2.0
64	2	2	2	\$0	\$8,136	64.0	0	2.0
12	2	2	2	\$0	\$4,577	36.0	0	6.0
144	3	3	3	\$0	\$36,613	288.0	0	6.0
7,500	61	61	61	\$0	\$3,908	30.7	0	0.3
12	2	2	2	\$0	\$191	1.5	0	0.3
2	2	2	2	\$50	\$2,005	20.0	20	0.0
2	2	2	2	\$0	\$254	2.0	0	2.0
2	2	2	2	\$0	\$254	2.0	0	2.0
61	61	61	61	\$0	\$254	2.0	0	2.0
8	2	2	2	\$0	\$509	4.0	0	1.0
144	3	3	3	\$0	\$12,204	96.0	0	2.0
5	5	5	5	\$50	\$2,005	20.0	20	0.0
100	100	100	100	\$50	\$2,005	20.0	20	0.0
64	16	16	16	\$0	\$3,051	24.0	0	6.0
16	16	16	16	\$0	\$1,271	10.0	0	10.0
50	5	5	5	\$0	\$10,170	80.0	0	8.0
8	2	2	2	\$0	\$509	4.0	0	1.0
-	10,000	0	0	\$0	\$64	0.5	0	0.5
-	2,500	0	0	\$0	\$315	2.5	0	0.0
8	4	4	4	\$0	\$1,526	12.0	0	6.0
8	4	4	4	\$0	\$509	4.0	0	2.0
16	4	4	4	\$0	\$1,017	8.0	0	2.0
4	4	4	4	\$50	\$2,005	20.0	20	0.0
1	1	1	1		\$12,713	100.0	0	100.0
6	6	6	6		\$509	4.0	0	4.0

0.0	20	20.0	\$2,005	\$50	6	6	6	6
2.0	0	2.0	\$254	\$0	6	6	6	6
2.0	0	2.0	\$254	\$0	12	12	12	12
100.0	0	100.0	\$12,713	\$0	1	1	1	1
4.0	0	4.0	\$509	\$0	2	2	2	2
0.0	20	20.0	\$2,005	\$50	2	2	2	2
2.0	0	2.0	\$254	\$0	2	2	2	2
100.0	0	100.0	\$12,713	\$0	1	1	1	1
6.0	0	6.0	\$763	\$0	2	2	2	2
40.0	0	40.0	\$5,085	\$0	1	1	1	1
9.4	0	37.6	\$4,780	\$0	20	20	20	80
10.0	0	10.0	\$1,271	\$0	20	20	20	20
0.0	40	40.0	\$4,009	\$50	20	20	20	20
0.5	0	0.5	\$64	\$0	0	20	1	-
0.0	0	647.1	\$82,261	\$0	0	5	20	-
0.5	0	0.5	\$64	\$0	0	50	1	-
0.0	0	647.1	\$82,261	\$0	0	13	50	-
0.0	20	20.0	\$2,005	\$50	0	50	50	-
9.4	0	37.6	\$4,780	\$0	3	3	3	12
10.0	0	10.0	\$1,271	\$0	3	3	3	3
0.0	40	40.0	\$4,009	\$50	3	3	3	3
0.5	0	0.5	\$64	\$0	0	3	1	-
0.0	0	647.1	\$82,261	\$0	0	1	3	-
6.0	0	12.0	\$1,526	\$0	12	12	12	24
6.0	0	6.0	\$763	\$0	1	1	1	1
6.0	0	6.0	\$763	\$0	1	1	1	1
6.0	0	6.0	\$763	\$0	5	5	5	5
6.0	0	12.0	\$1,526	\$0	42	42	42	84
6.0	0	6.0	\$763	\$0	50	50	50	50
6.0	0	12.0	\$1,526	\$0	40	40	40	80
2.0	0	4.0	\$509	\$0	40	40	40	80
0.0	80	80.0	\$8,018	\$50	42	42	42	42
40.0	0	40.0	\$5,085	\$6,239	129	129	129	129
								10,194

esponses per	Year	Total I	otal Hours per Year Total Labor Cost per Year				Total Labor Cost per Year		
Y2	Y3	Y1	Y2	Y3	Y1	Y2	Y3	Year	
1	1	100	100	100	\$12,713	\$12,713	\$12,713	\$0	
24	24	144	144	144	\$18,307	\$18,307	\$18,307	\$0	
6	6	240	240	240	\$30,511	\$30,511	\$30,511	\$0	
6	6	600	600	600	\$60,138	\$60,138	\$60,138	\$30	
1	1	3	1	1	\$381	\$64	\$64	\$(	
287	287	144	575	575	\$18,270	\$73,079	\$73,079	\$	
4	4	48	48	48	\$6,102	\$6,102	\$6,102	\$20	
8	8	2	2	2	\$254	\$254	\$254	\$	
2	2	4	4	4	\$509	\$509	\$509	\$	
2	2	4	4	4	\$509	\$509	\$509	\$	
244	244	1,464	1,464	1,464	\$186,118	\$186,118	\$186,118	\$	
61	61	610	610	610	\$77,549	\$77,549	\$77,549	\$	
61	61	6,100	6,100	6,100	\$611,403	\$611,403	\$611,403	\$3,05	
1	1	31	1	1	\$3,877	\$64	\$64	\$	
2,922	2,922	1,461	5,844	5,844	\$185,743	\$742,972	\$742,972	\$	
64	64	128	128	128	\$16,273	\$16,273	\$16,273	\$	
12	12	72	72	72	\$9,153	\$9,153	\$9,153	\$	
144	144	864	864	864	\$109,840	\$109,840	\$109,840	\$	
7,500	7,500	1,875	1,875	1,875	\$238,369	\$238,369	\$238,369	\$	
12	12	3	3	3	\$381	\$381	\$381	\$	
2	2	40	40	40	\$4,009	\$4,009	\$4,009	\$10	
2	2	4	4	4	\$509	\$509	\$509	\$	
2	2	4	4	4	\$509	\$509	\$509	\$	
61	61	122	122	122	\$15,510	\$15,510	\$15,510	\$	
8	8	8	8	8	\$1,017	\$1,017	\$1,017	\$	
144	144	288	288	288	\$36,613	\$36,613	\$36,613	\$	
5	5	100	100	100	\$10,023	\$10,023	\$10,023	\$25	
100	100	2,000	2,000	2,000	\$200,460	\$200,460	\$200,460	\$5,00	
64	64	384	384	384	\$48,818	\$48,818	\$48,818	\$	
16	16	160	160	160	\$20,341	\$20,341	\$20,341	\$	
50	50	400	400	400	\$50,852	\$50,852	\$50,852	\$	
8	8	8	8	8	\$1,017	\$1,017	\$1,017	\$	
-	10,000	0	0	5,000	\$0	\$0	\$635,650	\$	
-	2,227,500	0	0	6,188	\$0	\$0	\$786,617	\$	
8	8	48	48	48	\$6,102	\$6,102	\$6,102	\$	
8	8	16	16	16	\$2,034	\$2,034	\$2,034	\$	
16	16	32	32	32	\$4,068	\$4,068	\$4,068	\$	
4	4	80	80	80	\$8,018	\$8,018	\$8,018	\$20	
1	1	100	100	100	\$12,713	\$12,713	\$12,713	\$	
6	6	24	24	24	\$3,051	\$3,051	\$3,051	\$	

4,300,295			57,617			\$6,947,504		\$817,607
12,900,885			172,850			\$20,842,512		\$2,452,820
2,138,248	10,752,442	30,339	47,966	94,545	3,497,620	5,711,653	11,633,238	817,607
129	129	5,160	5,160	5,160	\$655,991	\$655,991	\$655,991	\$804,857
42	42	3,360	3,360	3,360	\$336,773	\$336,773	\$336,773	\$2,100
80	80	160	160	160	\$20,341	\$20,341	\$20,341	\$0
80	80	480	480	480	\$61,022	\$61,022	\$61,022	\$0
50	50	300	300	300	\$38,139	\$38,139	\$38,139	\$0
84	84	504	504	504	\$64,074	\$64,074	\$64,074	\$0
5	5	30	30	30	\$3,814	\$3,814	\$3,814	\$0
1	1	6	6	6	\$763	\$763	\$763	\$0
1	1	6	6	6	\$763	\$763	\$763	\$0
24	24	144	144	144	\$18,307	\$18,307	\$18,307	\$0
87,353	349,412	0	485	1,941	\$0	\$61,695	\$246,782	\$0
3	1	0	2	1	\$0	\$191	\$64	\$0
3	3	120	120	120	\$12,028	\$12,028	\$12,028	\$150
3	3	30	30	30	\$3,814	\$3,814	\$3,814	\$0
12	12	113	113	113	\$14,340	\$14,340	\$14,340	\$0
50	50	0	1,000	1,000	\$0	\$100,230	\$100,230	\$0
1,455,882	5,823,529	0	8,088	32,353	\$0	\$1,028,257	\$4,113,029	\$0
50	1	0	25	1	\$0	\$3,178	\$64	\$0
582,353	2,329,412	0	3,235	12,941	\$0	\$411,303	\$1,645,212	\$0
20	1	0	10	1	\$0	\$1,271	\$64	\$0
20	20	800	800	800	\$80,184	\$80,184	\$80,184	\$1,000
20	20	200	200	200	\$25,426	\$25,426	\$25,426	\$0
80	80	752	752	752	\$95,602	\$95,602	\$95,602	\$0
1	1	40	40	40	\$5,085	\$5,085	\$5,085	\$0
2	2	12	12	12	\$1,526	\$1,526	\$1,526	\$0
1	1	100	100	100	\$12,713	\$12,713	\$12,713	\$0
2	2	4	4	4	\$509	\$509	\$509	\$0
2	2	40	40	40	\$4,009	\$4,009	\$4,009	\$100
2	2	8	8	8	\$1,017	\$1,017	\$1,017	\$0
1	1	100	100	100	\$12,713	\$12,713	\$12,713	\$0
12	12	24	24	24	\$3,051	\$3,051	\$3,051	\$0
6	6	12	12	12	\$1,526	\$1,526	\$1,526	\$0
6	6	120	120	120	\$12,028	\$12,028	\$12,028	\$300

Total Cost per Year				
Y1	Y2	<b>Y</b> 3		
\$12,713	\$12,713	\$12,713		
\$18,307	\$18,307	\$18,307		
\$30,511	\$30,511	\$30,511		
\$60,438	\$60,438	\$60,438		
\$381	\$64	\$64		
\$18,270	\$73,079	\$73,079		
\$6,302	\$6,302	\$6,302		
\$254	\$254	\$254		
\$509	\$509	\$509		
\$509	\$509	\$509		
\$186,118	\$186,118	\$186,118		
\$77,549	\$77,549	\$77,549		
\$614,453	\$614,453	\$614,453		
\$3,877	\$64	\$64		
\$185,743	\$742,972	\$742,972		
\$16,273	\$16,273	\$16,273		
\$9,153	\$9,153	\$9,153		
\$109,840	\$109,840	\$109,840		
\$238,369	\$238,369	\$238,369		
\$381	\$381	\$381		
\$4,109	\$4,109	\$4,109		
\$509	\$509	\$509		
\$509	\$509	\$509		
\$15,510	\$15,510	\$15,510		
\$1,017	\$1,017	\$1,017		
\$36,613	\$36,613	\$36,613		
\$10,273	\$10,273	\$10,273		
\$205,460	\$205,460	\$205,460		
\$48,818	\$48,818	\$48,818		
\$20,341	\$20,341	\$20,341		
\$50,852	\$50,852	\$50,852		
\$1,017	\$1,017	\$1,017		
\$0	\$0	\$635,650		
\$0	\$0	\$786,617		
\$6,102	\$6,102	\$6,102		
\$2,034	\$2,034	\$2,034		
\$4,068	\$4,068	\$4,068		
\$8,218	\$8,218	\$8,218		
\$12,713	\$12,713	\$12,713		
\$3,051	\$3,051	\$3,051		

Year	Total Responses	Total Hours	Total Labor Costs
Year 1	10,194	30,339	\$3,497,620
Year 2	2,138,248	47,966	\$5,711,653
Year 3	10,752,442	94,545	\$11,633,238
Annual Average	4,300,295	57,617	\$6,947,504

### 0.013398332

Total Hours/Year	Year 1	Year 2	Year 3
Reporting	16,715	33,342	79,921
Recordkeeping	13,360	14,360	14,360

\$23,295,332 \$7,765,111							
.,	, ,	2=, .50,0 10					
4,315,227	6,529,260	12,450,845					
\$1,460,848	\$1,460,848	\$1,460,848					
\$338,873	\$338,873	\$338,873					
\$20,341	\$20,341	\$20,341					
\$61,022	\$61,022	\$61,022					
\$38,139	\$38,139	\$38,139					
\$64,074	\$64,074	\$64,074					
\$3,814	\$3,814	\$3,814					
\$763 \$763	\$763 \$763	\$763 \$763					
\$18,307	\$18,307 \$763	\$18,307					
\$18,307	\$18,307	\$18,307					
\$0 \$0	\$61,695	\$246,782					
\$12,176	\$12,176 \$191	\$12,176					
\$12,178	\$12,178	\$12,178					
\$3,814	\$14,340	\$3,814					
\$14,340	\$100,230	\$100,230					
\$0 \$0	\$1,028,257	\$100,230					
\$0 \$0	\$1,028,257	\$4,113,029					
\$0 \$0	\$3,178	\$1,043,212					
\$0 \$0	\$411,303	\$1,645,212					
\$81,184 \$0	\$81,184 \$1,271	\$81,184 \$64					
\$25,426	\$25,426	\$25,426					
\$95,602	\$95,602	\$95,602					
\$5,085	\$5,085	\$5,085					
\$1,526	\$1,526	\$1,526					
\$12,713	\$12,713	\$12,713					
\$509	\$509	\$509	,				
\$4,109	\$4,109	\$4,109					
\$1,017	\$1,017	\$1,017					
\$12,713	\$12,713	\$12,713					
\$3,051	\$3,051	\$3,051					
\$1,526	\$1,526	\$1,526					
\$12,328	\$12,328	\$12,328					

Total O&M Costs	<b>Total Costs</b>
\$817,607	\$4,315,227
\$817,607	\$6,529,260
\$817,607	\$12,450,845
\$817,607	\$7,765,111

- -

Average
43,326
14,027
57,353

# **Agency Assumptions**

Activity	Managerial Hours per activity	Technical Hours per activity	Clerical Hours per activity
Develop and Maintain a Certification ID Tracking System	120.0	3000.0	0.0
Notify Submitters of Baseline Allowances	0.1	1.0	0.0
Review Data for Reporting Completeness and Compliance	0.0	0.3	0.0
Process Transfer Reports	0.1	0.5	0.0
Review Petitions to Import HFCs	0.1	1.0	0.0
Review Importer of Record Reports	0.1	1.0	0.0
Review Third-Party Audits	0.1	2.0	0.0
Provide Reporting Guidance	0.0	2.0	0.0
Conduct Stakeholder Outreach Efforts	4.0	60.0	0.0
Maintain the Data Tracking System	40.0	750.0	0.0
Review Import Data Submitted in ACE	0.0	0.3	0.0
Conduct Compliance Monitoring Activities	120.0	2500.0	0.0
Ensure Non-Exceedance of AIM Act Limits	20.0	80.0	0.0

Activity	Number of Activities				
	Y1	<b>Y</b> 2	Y3		
Develop and Maintain a Certification ID Tracking System	1	1	0.8		
Notify Submitters of Baseline Allowances	67	67	67		
Review Data for Reporting Completeness and Compliance	8,234	8,234	8,234		
Process Transfer Reports	31	31	31		
Review Petitions to Import HFCs	76	76	76		
Review Importer of Record Reports	61	61	61		
Review Third-Party Audits	129	129	129		
Provide Reporting Guidance	40	40	40		
Conduct Stakeholder Outreach Efforts	1	1	1		
Maintain the Data Tracking System	1	1	1		
Review Import Data Submitted in ACE	64	64	64		
Conduct Compliance Monitoring Activities	2	2	2		
Ensure Non-Exceedance of AIM Act Limits	1	1	1		

Contractor Hours per activity	Source			
12000.0	Based on input from EPA			
1.0	Based on ODS ICR and input from EPA			
1.0	Based on ODS ICR and input from EPA			
0.5	Based on ODS ICR			
0.5	Based on ODS ICR and input from EPA			
0.0				
4.0	Based on input from EPA			
2.0	Based on ODS ICR plus an increase since new program			
120.0	Based on ODS ICR plus an increase since new program			
1800.0	Based on input from EPA			
0.1	Based on input from EPA			
750.0	Based on input from EPA			
80.0	Based on ODS ICR and input from EPA			

Source
Assumes development will be complete after year 2
Equals the number of producers + importers
Equals the number of one-time reports, producer, importer, exporter, transformation, destruction, process agent, RACA, and application-specific allowance holder reports received per year
Equals the number of trade reports received per year
Equals the number of petitions to import for destruction received per year
Equals the maximum number of importers
Based on ODS ICR
Based on current import level and EPA estimated effort
imports and exports

# **Agency Burden**

Activity	Managerial Hours per Activity	Technical Hours per Activity	Clerical Hours per Activity
Develop and Maintain a Certification ID Tracking System	120.0	3,000.0	0.0
Notify Submitters of Baseline Allowances	0.1	1.0	0.0
Review Data for Reporting Completeness and Compliance	0.0	0.3	0.0
Process Transfer Reports	0.1	0.5	0.0
Review Petitions to Import HFCs	0.1	1.0	0.0
Review Importer of Record Reports	0.1	1.0	0.0
Review Third-Party Audits	0.1	2.0	0.0
Provide Reporting Guidance	0.0	2.0	0.0
Conduct Stakeholder Outreach Efforts	4.0	60.0	0.0
Maintain the Data Tracking System	40.0	750.0	0.0
Review Import Data Submitted in ACE	0.0	0.3	0.0
Conduct Compliance Monitoring Activities	120.0	2,500.0	0.0
Ensure Non-Exceedance of AIM Act Limits	20.0	80.0	0.0

## TOTAL

# 3 Year Total

### Annual Average

Hourly Rates			
Managerial Rate	GS 15 Step 1	\$71.15	1.6
Technical Rate	GS 13 Step 1	\$51.18	1.6
Clerical Rate	GS 11 Step 1	\$49.04	1.6
Extramural Rate			

Contractor	Number of Activities		r	Γotal Hours			
Hours per Activity	Y1	Y2 Y3 Y		Y1	Y2	<b>Y</b> 3	
12,000.0	1	1	0.8	15,120	15,120	11,340	
1.0	67	67	67	141	141	141	
1.0	8,234	8,234	8,234	10,951	10,951	10,951	
0.5	31	31	31	34	34	34	
0.5	76	76	76	122	122	122	
0.0	61	61	61	67	67	67	
4.0	129	129	129	787	787	787	
2.0	40	40	40	160	160	160	
120.0	1	1	1	184	184	184	
1,800.0	1	1	1	2,590	2,590	2,590	
0.1	64	64	64	23	23	23	
750.0	2	2	2	6,740	6,740	6,740	
80.0	1	1	1	180	180	180	
				37,099 37,099 33,3			
				107,516.0			
35,83				35,839			

Managerial Cost				
Y1	<b>Y</b> 2	<b>Y</b> 3		
\$13,661	\$13,661	\$10,246		
\$763	\$763	\$763		
\$0	\$0	\$0		
\$353	\$353	\$353		
\$865	\$865	\$865		
\$694	\$694	\$694		
\$1,469	\$1,469	\$1,469		
\$0	\$0	\$0		
\$455	\$455	\$455		
\$4,554	\$4,554	\$4,554		
\$73	\$73	\$73		
\$27,322	\$27,322	\$27,322		
\$2,277	\$2,277	\$2,277		
\$52,485	\$52,485	\$49,070		
	\$154,039			
\$51,346				

\$113.84
\$81.89
\$78.46
\$130.52

Technical Cost		Clerical Cost Contractor Cost		st				
Y1	Y2	<b>Y</b> 3	Y1	Y2	<b>Y</b> 3	Y1	<b>Y</b> 2	<b>Y</b> 3
\$245,670	\$245,670	\$184,253	\$0	\$0	\$0	\$1,566,240	\$1,566,240	\$1,174,680
\$5,487	\$5,487	\$5,487	\$0	\$0	\$0	\$8,745	\$8,745	\$8,745
\$222,513	\$222,513	\$222,513	\$0	\$0	\$0	\$1,074,702	\$1,074,702	\$1,074,702
\$1,269	\$1,269	\$1,269	\$0	\$0	\$0	\$2,023	\$2,023	\$2,023
\$6,224	\$6,224	\$6,224	\$0	\$0	\$0	\$4,960	\$4,960	\$4,960
\$4,995	\$4,995	\$4,995	\$0	\$0	\$0	\$0	\$0	\$0
\$21,128	\$21,128	\$21,128	\$0	\$0	\$0	\$67,348	\$67,348	\$67,348
\$6,551	\$6,551	\$6,551	\$0	\$0	\$0	\$10,442	\$10,442	\$10,442
\$4,913	\$4,913	\$4,913	\$0	\$0	\$0	\$15,662	\$15,662	\$15,662
\$61,418	\$61,418	\$61,418	\$0	\$0	\$0	\$234,936	\$234,936	\$234,936
\$1,310	\$1,310	\$1,310	\$0	\$0	\$0	\$835	\$835	\$835
\$409,450	\$409,450	\$409,450	\$0	\$0	\$0	\$195,780	\$195,780	\$195,780
\$6,551	\$6,551	\$6,551	\$0	\$0	\$0	\$10,442	\$10,442	\$10,442
\$997,479	\$997,479	\$936,062	\$0	\$0	\$0	\$3,192,115	\$3,192,115	\$2,800,555
	\$2,931,020			\$0 \$9,184,784				
	\$977,007		\$0 \$3,061,595		\$0			

Total Cost			
Y1	<b>Y</b> 2	<b>Y</b> 3	
\$1,825,571	\$1,825,571	\$1,369,178	
\$14,994	\$14,994	\$14,994	
\$1,297,215	\$1,297,215	\$1,297,215	
\$3,645	\$3,645	\$3,645	
\$12,049	\$12,049	\$12,049	
\$5,690	\$5,690	\$5,690	
\$89,944	\$89,944	\$89,944	
\$16,993	\$16,993	\$16,993	
\$21,031	\$21,031	\$21,031	
\$300,907	\$300,907	\$300,907	
\$2,218	\$2,218	\$2,218	
\$632,552	\$632,552	\$632,552	
\$19,270	\$19,270	\$19,270	
\$4,242,079	\$4,242,079	\$3,785,686	
\$12,269,843			
\$4,089,948			

Year	Total Hours	<b>Total Costs</b>
Year 1	37,099	\$4,242,079
Year 2	37,099	\$4,242,079
Year 3	33,319	\$3,785,686
Annual Average	35,839	\$4,089,948

\$11,855,058