

Phasedown of Hydrofluorocarbons: Restrictions on the Use of Certain Hydrofluorocarbons under Subsection (i) of the American Innovation and Manufacturing Act of 2020

PART A OF THE SUPPORTING STATEMENT

1. Identification of the Information Collection

(a) Title: Phasedown of Hydrofluorocarbons: Restrictions on the Use of Certain Hydrofluorocarbons under Subsection (i) of the American Innovation and Manufacturing Act of 2020

OMB Number: 2060-AV46; EPA ICR Number: 2742.01

(b) Short Characterization

The American Innovation and Manufacturing (AIM) Act of 2020 authorizes EPA to address hydrofluorocarbons (HFCs) in three main ways: phasing down HFC production and consumption through an allowance allocation program; promulgating certain regulations for purposes of maximizing reclamation and minimizing releases of HFCs and their substitutes from equipment; and facilitating sector-based transitions to next-generation technologies. This ICR covers provisions under subsection (i) of the AIM Act that restrict, fully, partially, or on a graduated schedule, the use of hydrofluorocarbons (“HFCs” or “regulated substances”) in the sector or subsector in which the regulated substance is used. In accordance with the proposed rulemaking “Phasedown of Hydrofluorocarbons: Restrictions on the Use of Certain Hydrofluorocarbons under Subsection (i) of the American Innovation and Manufacturing Act of 2020,” manufacturers and importers of products containing HFCs are required to electronically report data to EPA and label products using regulated substances.

In the proposed rulemaking “Phasedown of Hydrofluorocarbons: Restrictions on the Use of Certain Hydrofluorocarbons under Subsection (i) of the American Innovation and Manufacturing Act of 2020,” EPA is requesting comment on the frequency of reporting; therefore, the burden associated with both quarterly and annual reporting is presented in this ICR.

Quarterly Reporting:

For the three years covered by this ICR, the total respondent burden associated with this information collection will average 60,798 hours per year and the respondent cost will average \$26,019,764 per year. This includes \$19,955,215 per year for operation and maintenance and an average of \$6,064,549 per year for labor. Over the same time period, the total estimated cost for EPA of the information collection will average \$625,894 per year. The total estimated cost for all respondents and EPA will average \$79,936,974 per year.

Annual Reporting:

For the three years covered by this ICR, the total respondent burden associated with this information collection will average 51,378 hours per year and the respondent cost will average \$25,178,950 per year. This includes \$19,955,215 per year for operation and maintenance and an average of \$5,223,735 per year for labor. Over the same time period, the total estimated cost for EPA of the information collection will average \$180,675 per year. The total estimated cost for all respondents and EPA will average \$77,414,532 per year.

2. Need For, and Use Of, the Collection

(a) Authority for the Collection

This information collection is authorized under the AIM Act (Section 103 in Division S, Innovation for the Environment, of the Consolidated Appropriations Act, 2021 (Pub. L. 116- 260)). In subsection (k)(1)(A), the AIM Act provides EPA with the authority to promulgate such regulations as are necessary to carry out EPA’s functions under the Act. Consistent with the AIM Act’s provision that “the Administrator may by rule restrict, fully, partially, or on a graduated schedule, the use of a regulated substance in the sector or subsector in which the regulated substance is used,” and to ensure compliance with these restrictions, persons who domestically manufacture or import products using regulated substances shall submit to the Administrator reports, maintain records, and implement labeling requirements on products that contain HFCs. The reports provide the quantity of the regulated substance contained in products that the person manufactured or imported as well as the quantity of products that are shipped without HFCs but intended to use HFCs upon installation. Additional records must be maintained, as are additional reports to document compliance. The labels indicate the name and global warming potential (GWP) of the regulated substance contained in each product, along with the date of manufacture or first charging, as applicable.

The Paperwork Reduction Act (PRA) requires Federal agencies to manage information resources to reduce information collection burdens on the public; increase program efficiency and effectiveness; and improve the integrity, quality, and utility of information to all users within and outside the Agency, including capabilities for ensuring dissemination of public information, public access to government information, and protections for privacy and security (44 USC 3506).

(b) Practical Utility/Users of the Data

The reporting, recordkeeping, and labeling requirements under subsection (i) enable EPA to:

1. Ensure compliance with the restrictions on manufacture and import of products containing regulated substances; and
2. Monitor market dynamics and the transitions that are occurring in the sectors and subsectors addressed by the proposed rulemaking;
3. Estimate future demand for HFCs to service equipment installed after the date of this rule.

3. Non-duplication, Consultation, and Other Collection Criteria

(a) Non-duplication

The Greenhouse Gas Reporting Program (GHGRP) was established in 2009 and requires various facilities and suppliers to annually report data related to GHGs to EPA (see 40 CFR part 98). The relevant subpart that relates to reporting on products containing HFCs is subpart QQ, “Imports and Exports of Equipment Pre-charged with Fluorinated GHGs or Containing Fluorinated GHGs in Closed-cell Foams.” Because the HFCs listed as regulated substances under the AIM Act are fluorinated greenhouse gases (GHGs), EPA has been collecting a significant amount of data relevant to imports of products containing HFCs as defined under the AIM Act since the GHGRP’s inception.

EPA intends to collect many reports required by this ICR electronically through the electronic Greenhouse Gas Reporting Tool (e-GGRT), which is the web-based system used to collect data under the GHGRP. The use of e-GGRT for HFC reporting will minimize duplicative reporting between the AIM Act and the GHGRP.

(b) Public Notice Required Prior to ICR Submission to OMB

The proposed rulemaking “Phasedown of Hydrofluorocarbons: Restrictions on the Use of Certain Hydrofluorocarbons under Subsection (i) of the American Innovation and Manufacturing Act of 2020” will serve as the public notice for this ICR. EPA is requesting comment on this ICR in that proposed rulemaking.

(c) Consultations

The burden calculations were developed based on EPA’s experience collecting data on products containing HFCs under GHGRP; EPA’s experience collecting data on ozone-depleting substances (ODS); and market research on the affected industries.

EPA will also collect comments on the proposed rulemaking “Phasedown of Hydrofluorocarbons: Restrictions on the Use of Certain Hydrofluorocarbons under Subsection (i) of the American Innovation and Manufacturing Act of 2020” and will adjust this ICR based on the comments received.

(d) Effects of Less Frequent Collection

Less frequent than quarterly collection of data could compromise EPA’s ability to monitor the manufacture and import of products containing HFCs and hinder EPA’s ability to identify violations of the proposed rulemaking “Phasedown of Hydrofluorocarbons: Restrictions on the Use of Certain Hydrofluorocarbons under Subsection (i) of the American Innovation and Manufacturing Act of 2020.”

EPA is considering whether reporting on an annual basis is sufficient to allow for monitoring of manufacture and import of products containing HFCs and for ensuring compliance with the proposed rulemaking “Phasedown of Hydrofluorocarbons: Restrictions on the Use of Certain Hydrofluorocarbons under Subsection (i) of the American Innovation and Manufacturing Act of 2020.”

In the proposed rulemaking “Phasedown of Hydrofluorocarbons: Restrictions on the Use of Certain Hydrofluorocarbons under Subsection (i) of the American Innovation and Manufacturing Act of 2020,” EPA is requesting comment on the frequency of reporting.

(e) General Guidelines

This collection of information has a five-year requirement for record and report retention, which exceeds the three-year requirement for record retention specified in the general information collection guidelines in 5 CFR 1320.5(f) of the OMB regulations implementing the Paperwork Reduction Act. This collection of information request is consistent with all other OMB guidelines at 5 CFR 1320.5(d)(2).

(f) Confidentiality

For all data elements that EPA has determined to be confidential or for which EPA will provide provisional confidential treatment if claimed by reporters as CBI, EPA will release aggregated data if there are three or more reporting entities.

(g) Sensitive Questions

This section is not applicable because this ICR does not involve matters of sensitive nature.

4. The Respondents and the Information Request

(a) Respondents' NAICS Codes

The appropriate North American Industry Classification System (NAICS) for potentially affected entities are listed below in Table I.

Table I. NAICS Classification of Potentially Affected Entities

NAICS Code	NAICS Industry Description
238220	Plumbing, Heating, and Air-Conditioning Contractors
311812	Commercial Bakeries
321999	All Other Miscellaneous Wood Product Manufacturing
322299	All Other Converted Paper Product Manufacturing
324191	Petroleum Lubricating Oil and Grease Manufacturing
324199	All Other Petroleum and Coal Products Manufacturing
325199	All Other Basic Organic Chemical Manufacturing
325211	Plastics Material and Resin Manufacturing
325412	Pharmaceutical Preparation Manufacturing
325414	Biological Product (except Diagnostic) Manufacturing
325998	All Other Miscellaneous Chemical Product and Preparation Manufacturing
326150	Urethane and Other Foam Product
326299	All Other Rubber Product Manufacturing
327999	All Other Miscellaneous Nonmetallic Mineral Product Manufacturing
332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers
332999	All Other Miscellaneous Fabricated Metal Product Manufacturing
333415	Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment Manufacturing
333511	Industrial Mold Manufacturing
333912	Air and Gas Compressor Manufacturing
333999	All Other Miscellaneous General Purpose Machinery Manufacturing
334419	Other Electronic Component Manufacturing
335220	Major Household Appliance Manufacturing
336120	Heavy Duty Truck Manufacturing
336212	Truck Trailer Manufacturing
336214	Travel Trailer and Camper Manufacturing
3363	Motor Vehicle Parts Manufacturing
3364	Aerospace Product and Parts Manufacturing
336411	Aircraft Manufacturing

NAICS Code	NAICS Industry Description
336611	Ship Building and Repairing
336612	Boat Building
336992	Military Armored Vehicle, Tank, and Tank Component Manufacturing
337214	Office Furniture (Except Wood) Manufacturing
339112	Surgical and Medical Instrument Manufacturing
339113	Surgical Appliance and Supplies Manufacturing
339999	All Other Miscellaneous Manufacturing
423120	Motor Vehicle Supplies and New Parts Merchant Wholesalers
423450	Medical, Dental, and Hospital Equipment and Supplies Merchant Wholesalers
423610	Electrical Apparatus and Equipment, Wiring Supplies, and Related Equipment Merchant Wholesalers
423620	Household Appliances, Electric Housewares, and Consumer Electronics Merchant Wholesalers
423690	Other Electronic Parts and Equipment Merchant Wholesalers
423720	Plumbing and Heating Equipment and Supplies (Hydronics) Merchant Wholesalers
423730	Warm Air Heating and Air-Conditioning Equipment and Supplies Merchant Wholesalers
423740	Refrigeration Equipment and Supplies Merchant Wholesalers
423830	Industrial Machinery and Equipment Merchant Wholesalers
423840	Industrial Supplies Merchant Wholesalers
423850	Service Establishment Equipment and Supplies Merchant Wholesalers
423860	Transportation Equipment and Supplies (except Motor Vehicle) Merchant Wholesalers
423990	Other Miscellaneous Durable Goods Merchant Wholesalers
424690	Other Chemical and Allied Products Merchant Wholesalers
424820	Wine and Distilled Alcoholic Beverage Merchant Wholesalers
443142	Electronics Stores
444190	Other Building Material Dealers
445110	Supermarkets and Other Grocery (except Convenience) Stores
445131	Convenience Retailers
445298	All Other Specialty Food Retailers
449210	Appliance Stores, Household-Type
453998	All Other Miscellaneous Store Retailers (except Tobacco Stores)
45711	Gasoline Stations With Convenience Stores
481111	Scheduled Passenger Air Transportation
531120	Lessors of Nonresidential Buildings (except Mini warehouses)
541330	Engineering Services
541380	Testing Laboratories
541512	Computer Systems Design Services
541519	Other Computer Related Services
541620	Environmental Consulting Services
562111	Solid Waste Collection
562211	Hazardous Waste Treatment and Disposal
562920	Materials Recovery Facilities
621498	All Other Outpatient Care Centers
621999	All Other Miscellaneous Ambulatory Health Care Services
72111	Hotels (Except Casino Hotels) and Motels
72112	Casino Hotels

NAICS Code	NAICS Industry Description
72241	Drinking Places (Alcoholic Beverages)
722513	Limited-Service Restaurants
722514	Cafeterias, Grill Buffets, and Buffets
722515	Snack and Nonalcoholic Beverage Bars
81119	Other Automotive Repair and Maintenance
811219	Other Electronic and Precision Equipment Repair and Maintenance
811412	Appliance Repair and Maintenance
922160	Fire Protection

(b) Information Requested

(i) Data items

Any entity that domestically manufactures or imports products containing or using HFCs (or are intended for use with HFCs) for use in refrigeration, air-conditioning and heat pumps; foams; and aerosols must ensure that the products are labeled, report information on a quarterly basis, and maintain records. The information required for each of these activities includes the following:

Equipment Labeling Requirements:

- The HFC or blend using an HFC in the product;
- The GWP of that HFC or blend using an HFC; and
- The date of manufacture or, for field charged equipment, the date of first charge.

Manufacturers and Importers Reporting Requirements:

- The sector and/or subsector of each imported or manufactured product;
- The identity of each HFC or blend using an HFC contained in the product;
- The GWP of each HFC or blend using an HFC contained in the product;
- The total mass in metric tons of each HFC or blend using an HFC contained in the product;
- The charge size of each product containing an HFC or blend using an HFC;
- The number of imported or manufactured products containing an HFC or blend using an HFC;
- The dates on which the products containing an HFC or blend using an HFC were imported or domestically manufactured;
- For products intended to use HFCs, the intended identities of the HFCs, their GWPs, charge size, and number of products manufacturer or imported; and
- A statement of certification that the data provided are accurate.

Manufacturers and Importers Recordkeeping Requirements:

- The sector and/or subsector of each imported or manufactured product containing an HFC or blend using an HFC;
- The identity of each HFC or blend using an HFC contained in the product, or intended to be used in the product;
- The GWP of each HFC or blend using an HFC contained in the product, or intended to be used in the product;
- The total mass in metric tons of each HFC or blend using an HFC contained in the product;
- The charge size of each product containing an HFC or blend using an HFC, or intended to be used in the product;
- The number of imported or manufactured products containing an HFC or blend using an HFC, or intended to be used in the product;
- The date(s) on which the products containing an HFC or blend using an HFC were

- imported or domestically manufactured; and
- For importers, a copy of the bill of lading for the import, the invoice for the import, the U.S. Customs entry forms, ports of entry through which the products passed, and countries from which the products were imported.

(ii) Respondent Activities

A summary of respondent activities by respondent type is provided in Table II below.

Table II. Respondent Activities by Sector

Activity	Reporting Frequency
Submit quarterly or annual report	Quarterly or Annual
One-time label development/redesign	One-Time
Label printing and affixing	As needed
Maintain records	Annual

All records and reports must comply with requirements for HFC regulated substances in accordance with the proposed rule “Phasedown of Hydrofluorocarbons: Restrictions on the Use of Certain Hydrofluorocarbons under Subsection (i) of the American Innovation and Manufacturing Act of 2020.” Reports and records associated with the reports listed above must be kept for five years.

These recordkeeping requirements pertain to original documents that are held by companies in the normal course of conducting business, accounts of daily production runs, sales invoices, and bills of lading. Information from these recordkeeping documents is summarized in reports. Recordkeeping requirements are designed to aid EPA in compliance monitoring, site inspection, and enforcement actions.

The labeling and packaging requirements apply to products using an HFC or blend using an HFC with a GWP less than the prohibited level (or are intended to be used with such HFCs but are shipped without being factory charged). EPA recognizes that existing labels may already include the required information and would be sufficient to meet the proposed requirements. The labeling and packaging requirements are designed to aid EPA in compliance monitoring and enforcement actions and may ease inspection by EPA and U.S. Customs.

5. The Information Collected - Agency Activities, Collection Methodology, and Information Management

(a) Agency Activities

Activities associated with this information collection request include the following:

- Review data for reporting completeness and compliance;
- Provide reporting guidance;
- Conduct stakeholder outreach;
- Expand the data tracking system; and
- Conduct compliance monitoring activities.

(b) Collection Methodology and Management

EPA will leverage two existing reporting systems to collect and track data on products containing HFCs: (1) e-GGRT and (2) the HFC and ODS Allowance Tracking System (HAWK). EPA currently uses e-GGRT to collect data on products containing HFCs in accordance with 40 CFR part 84 and to collect and store data on GHGs (including HFCs) in accordance with the GHGRP (40 CFR part 98), while the HAWK is used by EPA to collect and track data on ODS and HFCs that are reported in accordance with 40 CFR parts 82 and to store and track data on HFCs that are reported in accordance with 40 CFR part 84. Both systems are designed to collect and store CBI in compliance with U.S. government security standards.

Information required under this ICR will be reported electronically to EPA using EPA's Central Data Exchange (CDX) through e-GGRT. Following submission, the data will be migrated into HAWK for the purposes of data management, leveraging the infrastructure of the data tracking system implemented for ODS.

(c) Small Entity Flexibility

The burden on small entities has been reduced to every extent possible including collecting reports from entities as far "upstream" as possible (i.e., manufacturer or importer) and using existing reporting infrastructure and data elements from the GHGRP.

(d) Collection Schedule

Reports described in this section must be submitted to EPA within 45 days of the end of the applicable reporting period, unless otherwise specified.

6. Estimating the Burden and Cost of Collection

This section presents EPA's estimates of the burden and costs to respondents associated with the activities described in Section 4 of this document, as well as the federal burden hours and costs associated with the activities described in Section 5 of this document.

(a) Estimating Respondent Burden

EPA identified four information collection activities that are mandated by EPA's rulemaking. EPA estimated the amount of time associated with each activity based on EPA's experience collecting similar activity data on products containing HFCs under 40 CFR part 84 and the GHGRP (74 FR 56260; October 30, 2009) and ODS under 40 CFR part 82. This analysis assumes that all respondent burden hours are incurred by technical, clerical, marketing, and graphic design staff at companies that submit reports and develop product labels and/or packaging. Table III below summarizes the number of burden hours incurred by each respondent for each information collection activity.

(b) Estimating Respondent Costs

To determine respondent costs, an average hourly wage rate of \$60.54 for technical staff, the hourly wage rate for professional and related persons, was derived from the Bureau of Labor Statistics (BLS) Employer Costs for Employee Compensation, Table 2, ("civilian workers, by occupational and industry group"), June 2022. An average hourly wage rate of \$30.48 for clerical staff, the

hourly wage rate for office and administrative support staff, was derived from the BLS Employer Costs for Employee Compensation, Table 2, (“civilian workers, by occupational and industry group”), June 2022. A 110 percent increase was added to reflect the estimated additional costs for overhead (a fringe rate of 31.2 percent is included in the average hourly wage rates presented in BLS Employer Costs for Employee Compensation, Table 2, June 2022), which increased the wage rates to \$127.13 and \$64.01 per hour for technical staff and clerical staff, respectively. Burden hours were multiplied by the labor rate to determine respondent costs.

In addition, an average hourly wage rate of \$73.77 for marketing staff, the hourly wage rate for marketing managers, was derived from the BLS Occupational Employment and Wage Statistics, May 2021. An average hourly wage rate of \$28.83 for graphic design staff, the hourly wage rate for graphic designers, was derived from the BLS Occupational Employment and Wage Statistics, May 2022. A 110 percent increase was added to reflect the estimated additional costs for overhead, and a 31.2 percent increase was added to reflect the estimated additional fringe costs, which increased the wage rates to \$203.35 and \$79.43 per hour for marketing staff and graphic design staff, respectively. Burden hours were multiplied by the labor rate to determine respondent costs.

Operations and maintenance (O&M) costs associated with recordkeeping requirements were designated at \$50 per year, which will cover the cost of whatever method companies use to store their records, such as a flash drive, paper file, or cloud storage. O&M costs associated with label printing were estimated at \$0.10 per label, which was multiplied by the number of labels printed per respondent to determine respondent labeling costs.

Table VII below summarizes annual labor and O&M costs for each respondent by information collection activity. Costs are calculated by multiplying burden hours per response by the number of responses per year by the assumed hourly wage rates of staff. The number of responses per year are based on the reporting frequency of each activity (as outlined in Table II), market research on the affected industries, and EPA’s experience collecting data under Subpart QQ of the GHGRP.

(c) Estimating Agency Burden and Costs

EPA identified five activities incurred by the federal government associated with this data collection request. Burden associated with each activity is based on EPA’s experience with reporting and data collection of HFCs and ODS. The number of occurrences of each activity is based on the estimated number of responses per year for each year of this ICR (as discussed further in section (d) below).

Costs are subdivided into Agency and contractor costs. The average hourly rates for EPA technical and managerial staff of \$51.18 and \$71.15, respectively, are derived from the 2022 annual base pay table, which was retrieved from the Office of Personnel Management website. The rate for technical staff is based on a GS-13 step 1 salary and the rate for managerial staff is based on a GS-15 step 1 salary. These rates were then multiplied by the standard government benefits multiplication factor of 1.6 to get hourly rates of \$81.89 for technical staff and \$113.84 for managerial staff. The cost of contractor time is valued at \$130.52 per hour on average, including overhead and fringe. This rate takes into account a weighted average of managerial and technical staff hours, based on rates for Senior Technical Analyst III and Consultant I approved under EPA Contract #68HERH19D0029. Table V summarizes total agency burden and costs by activity.

(d) Estimating the Respondent Universe and Total Burden and Costs

The respondent universe for this ICR is based on a review of HFC-containing product data collected under the GHGRP and market research on the affected industries. In total, EPA estimates 942 unique respondents are subject to the information collection requirements outlined in this ICR. This estimate takes into account the fact that the respondent types specified in Table II are not mutually exclusive, meaning a given respondent may be subject to more than one information collection activity.

Table IX summarizes the total number of respondents per activity per year as well as total burden hours and costs per year. The number of respondents per activity per year varies across the three years covered by this ICR due to the one-time label design requirement. Total respondent burden hours and costs are derived by multiplying the number of respondents per activity by total hours and total costs per respondent per year (see Table III). EPA has not deducted any respondent burden that is already covered under the GHGRP's ICR (2060-0629). EPA will consider the best approach for aligning the burden calculations in this ICR with the ICR for the GHGRP in a future renewal.

Table III.A Quarterly Reporting Hours and Costs per Respondent Activity

Respondent Sector	Activity	Responses per Respondent per Year	Technical Hours per Response	Clerical Hours per Response	Marketing Hours per Response	Graphic Design Hours per Response	Total Hours per Respondent per Year	Labor Cost per Respondent per Year	O&M Costs per Respondent per Year
Refrigeration and Air Conditioning	One-time label development/redesign	1	0.0	0.0	5.3	8.4	13.6	\$1,732	\$0
	Label printing and affixing	125,015	0.0	0.0	0.0	0.0	0.0	\$0	\$12,502
	Submit quarterly report	4	8.0	2.0	0.0	0.0	40.0	\$4,580	\$0
	Maintain records	1	0.0	20.0	0.0	0.0	20.0	\$1,280	\$50
Foams	One-time label development/redesign	1	0.0	0.0	5.3	8.4	13.6	\$1,732	\$0
	Label printing and affixing	248,724	0.0	0.0	0.0	0.0	0.0	\$0	\$24,872
	Submit quarterly report	4	8.0	2.0	0.0	0.0	40.0	\$4,580	\$0
	Maintain records	1	0.0	20.0	0.0	0.0	20.0	\$1,280	\$50
Aerosols	One-time label development/redesign	1	0.0	0.0	5.3	8.4	13.6	\$1,732	\$0
	Label printing and affixing	253,750	0.0	0.0	0.0	0.0	0.0	\$0	\$25,375
	Submit quarterly report	4	8.0	2.0	0.0	0.0	40.0	\$4,580	\$0
	Maintain records	1	0.0	20.0	0.0	0.0	20.0	\$1,280	\$50

Table IV.B Annual Reporting Hours and Costs per Respondent Activity

Respondent Sector	Activity	Responses per Respondent per Year	Technical Hours per Response	Clerical Hours per Response	Marketing Hours per Response	Graphic Design Hours per Response	Total Hours per Respondent per Year	Labor Cost per Respondent per Year	O&M Costs per Respondent per Year
Refrigeration and Air Conditioning	One-time label development/redesign	1	0.0	0.0	5.3	8.4	13.6	\$1,732	\$0
	Label printing and affixing	125,015	0.0	0.0	0.0	0.0	0.0	\$0	\$12,502
	Submit annual report	1	28.0	2.0	0.0	0.0	30.0	\$3,688	\$0
	Maintain records	1	0.0	20.0	0.0	0.0	20.0	\$1,280	\$50
Foams	One-time label development/redesign	1	0.0	0.0	5.3	8.4	13.6	\$1,732	\$0
	Label printing and affixing	248,724	0.0	0.0	0.0	0.0	0.0	\$0	\$24,872
	Submit annual report	1	28.0	2.0	0.0	0.0	30.0	\$3,688	\$0
	Maintain records	1	0.0	20.0	0.0	0.0	20.0	\$1,280	\$50
Aerosols	One-time label development/redesign	1	0.0	0.0	5.3	8.4	13.6	\$1,732	\$0
	Label printing and affixing	253,750	0.0	0.0	0.0	0.0	0.0	\$0	\$25,375
	Submit annual report	1	28.0	2.0	0.0	0.0	30.0	\$3,688	\$0
	Maintain records	1	0.0	20.0	0.0	0.0	20.0	\$1,280	\$50

Table V.A Quarterly Reporting Agency Burden and Cost Table

Activity	Managerial Hours per Activity	Technical Hours per Activity	Clerical Hours per Activity	Contractor Hours per Activity	Number of Activities			Total Hours			Total Cost		
					Y1	Y2	Y3	Y1	Y2	Y3	Y1	Y2	Y3
Review Data for Reporting Completeness and Compliance	0.0	0.3	0.0	1.0	3,768	3,768	3,768	5,011	5,011	5,011	\$593,625	\$593,625	\$593,625
Provide Reporting Guidance	0.0	2.0	0.0	2.0	40	40	40	160	160	160	\$16,993	\$16,993	\$16,993
Conduct Stakeholder Outreach Efforts	4.0	40.0	0.0	80.0	1	0	0	124	0	0	\$14,173	\$0	\$0
Expand the Data Tracking System	20.0	40.0	0.0	200.0	1	0	0	260	0	0	\$31,656	\$0	\$0

Table VI.B Annual Reporting Agency Burden and Cost Table

Activity	Managerial Hours per Activity	Technical Hours per Activity	Clerical Hours per Activity	Contractor Hours per Activity	Number of Activities			Total Hours			Total Cost		
					Y1	Y2	Y3	Y1	Y2	Y3	Y1	Y2	Y3
Review Data for Reporting Completeness and Compliance	0.0	0.3	0.0	1.0	942	942	942	1,253	1,253	1,253	\$148,406	\$148,406	\$148,406
Provide Reporting Guidance	0.0	2.0	0.0	2.0	40	40	40	160	160	160	\$16,993	\$16,993	\$16,993
Conduct Stakeholder Outreach Efforts	4.0	40.0	0.0	80.0	1	0	0	124	0	0	\$14,173	\$0	\$0
Expand the Data Tracking System	20.0	40.0	0.0	200.0	1	0	0	260	0	0	\$31,656	\$0	\$0

Table VII.A Quarterly Reporting Respondent Burden and Cost Table

Respondent Sector	Activity	Respondents per Activity per Year			Total Hours per Year			Total Cost per Year		
		Y1	Y2	Y3	Y1	Y2	Y3	Y1	Y2	Y3
Refrigeration and Air Conditioning	One-time label development/redesign	285	0	0	3,883	0	0	\$493,710	\$0	\$0
	Label printing and affixing	285	285	285	0	0	0	\$3,562,928	\$3,562,928	\$3,562,928
	Submit quarterly report	285	285	285	11,400	11,400	11,400	\$1,305,400	\$1,305,400	\$1,305,400
	Maintain records	285	285	285	5,700	5,700	5,700	\$379,096	\$379,096	\$379,096
Foams	One-time label development/redesign	649	0	0	8,843	0	0	\$1,124,272	\$0	\$0
	Label printing and affixing	649	649	649	0	0	0	\$16,142,188	\$16,142,188	\$16,142,188
	Submit quarterly report	649	649	649	25,960	25,960	25,960	\$2,972,648	\$2,972,648	\$2,972,648
	Maintain records	649	649	649	12,980	12,980	12,980	\$863,274	\$863,274	\$863,274
Aerosols	One-time label development/redesign	8	0	0	109	0	0	\$13,859	\$0	\$0
	Label printing and affixing	8	8	8	0	0	0	\$203,000	\$203,000	\$203,000
	Submit quarterly report	8	8	8	320	320	320	\$36,643	\$36,643	\$36,643
	Maintain records	8	8	8	160	160	160	\$10,641	\$10,641	\$10,641

Table VIII.B Annual Reporting Respondent Burden and Cost Table

Respondent Sector	Activity	Respondents per Activity per Year			Total Hours per Year			Total Cost per Year		
		Y1	Y2	Y3	Y1	Y2	Y3	Y1	Y2	Y3
Refrigeration and Air Conditioning	One-time label development/redesign	285	0	0	3,883	0	0	\$493,710	\$0	\$0
	Label printing and affixing	285	285	285	0	0	0	\$3,562,928	\$3,562,928	\$3,562,928
	Submit annual report	285	285	285	8,550	8,550	8,550	\$1,051,014	\$1,051,014	\$1,051,014
	Maintain records	285	285	285	5,700	5,700	5,700	\$379,096	\$379,096	\$379,096
Foams	One-time label development/redesign	649	0	0	8,843	0	0	\$1,124,272	\$0	\$0
	Label printing and affixing	649	649	649	0	0	0	\$16,142,188	\$16,142,188	\$16,142,188
	Submit annual report	649	649	649	19,470	19,470	19,470	\$2,393,361	\$2,393,361	\$2,393,361
	Maintain records	649	649	649	12,980	12,980	12,980	\$863,274	\$863,274	\$863,274
Aerosols	One-time label development/redesign	8	0	0	109	0	0	\$13,859	\$0	\$0
	Label printing and affixing	8	8	8	0	0	0	\$203,000	\$203,000	\$203,000
	Submit annual report	8	8	8	240	240	240	\$29,502	\$29,502	\$29,502
	Maintain records	8	8	8	160	160	160	\$10,641	\$10,641	\$10,641

(e) Bottom Line Burden Hours and Cost Tables**(i) Respondent Tally****Quarterly Reporting:**

As shown in Table IX.A, EPA estimates the total annual hour and cost burden to all respondents to average 60,798 hours and \$26,019,764.

Table IX.A. Quarterly Respondent Burden Summary Table

Year	Total Responses	Total Hours	Total Labor Costs	Total O&M Costs	Total Costs
Year 1	199,086,803	69,355	\$7,152,443	\$19,955,215	\$27,107,658
Year 2	199,085,861	56,520	\$5,520,602	\$19,955,215	\$25,475,817
Year 3	199,085,861	56,520	\$5,520,602	\$19,955,215	\$25,475,817
Quarterly Average	199,086,175	60,798	\$6,064,549	\$19,955,215	\$26,019,764

Annual Reporting:

As shown in Table VII.B, EPA estimates the total annual hour and cost burden to all respondents to average 51,378 hours and \$25,178,950.

Table X.B. Annual Respondent Burden Summary Table

Year	Total Responses	Total Hours	Total Labor Costs	Total O&M Costs	Total Costs
Year 1	199,083,977	59,935	\$6,311,629	\$19,955,215	\$26,266,844
Year 2	199,083,035	47,100	\$4,679,788	\$19,955,215	\$24,635,003
Year 3	199,083,035	47,100	\$4,679,788	\$19,955,215	\$24,635,003
Annual Average	199,083,349	51,378	\$5,223,735	\$19,955,215	\$25,178,950

(ii) The Agency Tally**Quarterly Reporting:**

As shown in Table XI.A, EPA estimates the total annual hour and cost burden to the Agency to average 5,299 hours and \$625,894.

Table XI.A. Quarterly Agency Burden Summary Table

Year	Total Hours	Total Costs
Year 1	5,555	\$656,446
Year 2	5,171	\$610,617
Year 3	5,171	\$610,617
Quarterly Average	5,299	\$625,894

Annual Reporting:

As shown in Table VII.B, EPA estimates the total annual hour and cost burden to the Agency to average 1,541 hours and \$180,675.

Table XII.B. Annual Agency Burden Summary Table

Year	Total Hours	Total Costs
Year 1	1,797	\$211,228
Year 2	1,413	\$165,399
Year 3	1,413	\$165,399
Annual Average	1,541	\$180,675

(f) Reasons for Change in Burden

This is a new information collection request.

(g) Burden Statement

The public reporting burden for this collection of information is estimated to average 0.0003 hours per response for Quarterly Reporting or 0.0002 hours per response for Annual Reporting. 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.