

**SUPPORTING STATEMENT FOR**  
**EPA INFORMATION COLLECTION REQUEST (ICR) NUMBER 2349.03**  
**EPA'S GREENHILL ADVANCED REFRIGERATION PARTNERSHIP (RENEWAL)**

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## 1) IDENTIFICATION OF THE INFORMATION COLLECTION

### a) Title and Number of the Information Collection

This ICR is entitled "GreenChill Advanced Refrigeration Partnership (Renewal)"

OMB Control Number: 2060-0702

EPA ICR Number: 2349.03

### b) Characterization of the Information Collection

GreenChill is a voluntary partnership program sponsored by the U.S. Environmental Protection Agency (EPA) that encourages food retail, chemical producing, and refrigeration systems manufacturing companies to adopt cost effective technologies and practices that reduce refrigerant emissions and improve operational efficiency. Refrigerants used in food retail locations are often ozone-depleting substances and potent greenhouse gases. The GreenChill Program works with these industries to lower barriers that inhibit the implementation of technologies and practices that reduce refrigerant emissions. The Program promotes the adoption of emission reduction practices and technologies.

The GreenChill Program collects four types of information from participants:

1. **One-time Agreement Form.** Participation in the GreenChill Partnership begins with the completion and submittal of a two-page Partnership Agreement that outlines responsibilities of the GreenChill Partner company and EPA. For food retailer partners, a worksheet accompanies this form for prospective Partners to self-identify as a small format food retailer or a large format food retailer for the purpose of GreenChill data analysis and recognition. This voluntary agreement can be terminated by the GreenChill Partner or EPA with no notice or penalties or further obligation.
2. **Annual Reporting.** Annual reporting is a key part of the Partnership. Upon acceptance, food retail Partners agree to submit an Annual Report documenting the previous year's refrigerant stocks and emissions from commercial refrigeration systems. Thereafter, food retail Partners report refrigerant emission reduction activities on an annual basis. Partners may voluntarily submit annual information to further characterize the refrigerant stocks and emissions including refrigerant from heating, ventilation, and air conditioning; and refrigerated space (e.g., square footage). Systems manufacturing Partners also submit annual reports for commercial refrigeration system sales for a coarse grouping of common technologies.
3. **Annual Refrigerant Management Plan.** In addition to annual stocks and emissions reporting, each year food retail Partners agree to submit a Refrigerant Management Plan. In their management plans, Partners are encouraged to communicate their refrigerant emission management efforts to EPA.
4. **Individual Store Certification and Annual Re-certification.** The GreenChill

Program offers food retailers the opportunity for any individual store to be GreenChill-certified at one of multiple tiered certification levels when it meets a set of criteria. Stores may demonstrate that the amount of refrigerant used is below a specified limit, based on the store's cooling load, measured in million British Thermal Units per hour (MBTU/hr), that the refrigerant emitted from the store in the prior 12 months is below the specified percentage for the GreenChill Store Certification level. Certifications are valid for one year; food retail locations must re-apply and meet the Program criteria if they wish to remain certified. Food retailers do not need to be a Partner to participate in this part of the Program. It is not necessary to have a signed a Partnership Agreement.

## **2) NEED FOR AND USE OF THE COLLECTION**

### **a) Need/Authority for the Collection**

EPA developed this ICR to obtain authorization to voluntarily collect information from GreenChill Partners and Store Certification Program participants.

EPA collects initial information via the two-page Partnership Agreement. The Partnership Agreement provides general information for a new GreenChill Partner company including relevant points of contact. EPA uses information obtained from the Partnership Agreement to identify and initiate communication with the Partner.

The Refrigerant Management Plan and Annual Report allow EPA to evaluate a Partner's progress in implementing the Program and to assess Partner results in relation to their goals. The information provided in the Plan and Annual Report also allows EPA to track actions taken by Partners to reduce refrigerant emissions, to reduce amounts of installed refrigerant, and to adopt advanced refrigerant technologies. The information provided helps EPA better target its technical and other assistance to Partners.

EPA also collects information from any individual store that seeks to obtain GreenChill Store Certification at one of multiple tiered levels by meeting the demonstrated criteria, which may include the amount of refrigerant used MBTU/hr of cooling for the store and percentage of emitted refrigerant over the prior year.

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

EPA uses information in the Partnership Agreement to populate its contacts database/tracking system with information on GreenChill Partners (current and past). This information is maintained in the contacts database/tracking system and serves as a source of general information as well as an electronic mailing list. The accompanying worksheets provide data for analytical purposes.

EPA uses information submitted in the Refrigerant Management Plan and Annual Report to document the progress of Partner companies in implementing the Program and reducing refrigerant emissions. EPA analyzes Annual Report information received from Partners using statistical analysis software. On an annual basis, EPA also aggregates these data and prepares a description of Program trends and Partner summary reports. All information submitted to EPA is treated in accordance with the regulations at 40 CFR Part 2, including the provisions on maintaining confidential business information (CBI). EPA determines the weighted-average emission rate for the reporting GreenChill Partner companies for the year. EPA takes the number of stores reported by each company, and the installed amount of refrigerant for the reporting company, as well as the emission of each of the refrigerants to calculate the weighted-average emission rate for reporting GreenChill Partners. The aggregated data are used in two ways:

- The aggregated weighted-average emission rate for GreenChill Partners is used to develop estimated projections for future industry-wide emission reductions based on assumptions such as a steady growth in the number of GreenChill Partners and changes in the number of food retailers in the U.S.
- The Program also aggregates the emission reductions of GreenChill Partners in a given year in comparison to the emission rate of each Partner's base year to describe the performance of the GreenChill Partners.

EPA uses these data to develop technical documents on specific technologies and practices and prepare case studies showing successful implementation experiences. These documents are publicly available and serve to demonstrate the benefits that can be realized through the implementation of technologies and practices to cut refrigerant emissions and to provide technical assistance.

To facilitate and promote refrigerant emission reductions among the Partners, the GreenChill Program undertakes the following activities:

- Developing technical fact sheets, reports, and articles,
- Hosting technology analysis webinars and roundtable discussions,
- Providing technical support to Partner companies,
- Supporting research activities,
- Publicizing achievements of Partner companies, and
- Making available to Partners a mechanism for recording and storing information about refrigerant emission reduction activities.

In addition to benefiting Partner companies, the above activities benefit non-partner companies. The technical documents and webinars are available to both Partners and non-partners. By undertaking the above activities, EPA lowers the cost of gathering and disseminating information regarding refrigerant emissions to both Partners and non-partners of the GreenChill Program. We note that non-partners may choose to undertake the actions based on the technical information provided through the GreenChill Program, but the Agency does not gather that information. For example, all the technical documents developed by the Program are

made available to the public on the GreenChill website, and webinar attendance is not restricted to Program Partners. Thus, it is possible that a portion of the food retail industry that is not partnering with GreenChill is also implementing some of the refrigerant emission reduction activities that are encouraged by the Program. As noted above, GreenChill does not attempt to estimate the accomplishments of these companies, even though their activities may be at least partially due to the existence of the GreenChill Program.

The practical utility of the information received by EPA from individual stores seeking GreenChill Store Certification is to give these stores recognition for their efforts to minimize refrigerant use and refrigerant emissions within the broad industry and with their customers. Individual stores that meet GreenChill Store Certification criteria can take credit through internal and external announcements that they are taking actions to manage their refrigerant use and emissions and use an announcement to distinguish the store from others in an effort to attract customers.

### **3) NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

#### **a) Nonduplication**

The information obtained under this ICR is not collected by EPA or any other Federal agency. Under Section 608 of the Clean Air Act, EPA sets a regulatory limit for the refrigerant leak rate in stationary equipment, such as in food retailers, and companies are required to repair or replace equipment with leaks at or above that level, and only report this information to EPA if the repair or replacement will exceed the regulatory time limit or the leak exceeds 125 percent of the total refrigerant charge over a calendar year. No other EPA or Federal program collects individual store information regarding the amount of refrigerant per cooling load and the percentage of refrigerant emissions for the prior 12 months.

#### **b) Public Notice Required Prior to ICR Submission to OMB**

In compliance with the 1995 Paperwork Reduction Act (PRA), EPA issued a public notice in the Federal Register (87 FR 51978) on August 24, 2022, soliciting public comments for a 60-day period. One comment was received from a private citizen recommending three ways to automate the reporting that is part of the Store Certification Program: 1) EPA should accept electronic submission of responses instead of a PDF packet for each application, 2) EPA could use artificial intelligence (AI) software that parses through Store Certification Application documents to perform an initial review of the data and material submitted, and 3) EPA should create a shorter application for applicants that are recertifying versus applying for certification for the first time.

The GreenChill program has considered and continues to explore the potential for a web-based platform that could enable electronic submission of Store Certification application data. While such a system has the potential to reduce the burden of information collection, further market research must be done to accurately forecast the potential efficiency gains against the generally large upfront technical capital investment that would be needed to deploy such a

system. The topic raised by the commenter is beyond the scope of this particular ICR renewal, but could be revisited in a future ICR renewal. EPA notes that nothing in this ICR changes the way EPA reviews submissions under the GreenChill program. EPA is issuing a second public notice in the Federal Register soliciting public comment for a 30-day period concurrent with the submission of this ICR to OMB.

### **c) Consultations**

In preparing to renew this information collection request, EPA consulted with potential respondents representing various industries, companies, and organizations that have recently reported to the GreenChill program. Three respondents were from Target, Aldi, and Giant Eagle.

In general, the responses received are consistent with the proposed burden statement put forward in the August 24, 2022, Federal Register notice. One respondent, Aldi, advised that they were not currently open to adjusting the reporting requirements (e.g., the required reporting of refrigerants used in heating and ventilation systems) as it would necessitate a change in their current reporting procedures for future reporting under the program (e.g., currently only reporting on commercial refrigeration systems). EPA considered that some partner respondents already report both kinds of data on refrigeration and air conditioning equipment, that the data collected would ensure complete information on refrigerant use for program planning, and that there would be sufficient time to adjust reporting procedures given the additional reporting would take effect only after renewal of this ICR, i.e., in 2024 based on 2023 data. Based on these considerations, EPA is not changing the conclusions of this Supporting Statement for the ICR renewal.

### **d) Effects of Less Frequent Collection**

The completion and submittal of the Partnership Agreement is a one-time activity when companies voluntarily choose to become a Partner in the GreenChill Program. Partners must also prepare and submit an annual Refrigerant Management Plan and an Annual Report while participating in the Program. EPA believes that any reduction in the frequency of this information collection and submittal would impede efforts by EPA to evaluate results achieved by Partner companies / stores and the Program.

The completion and submittal of the GreenChill Store Certification application is voluntary. There is nothing compelling an individual store to submit the information; however, to earn GreenChill Store Certification at any of the tiered levels, a store must provide the information in the application.

### **e) General Guidelines**

This ICR follows all the regulations established by OMB in 5 CFR 1320.5.

### **f) Confidentiality**

The handling of information submitted to EPA is noted in 2b.

**g) Sensitive Questions**

No questions of a sensitive nature are asked in this ICR.

**4) THE RESPONDENTS AND THE INFORMATION REQUESTED**

**a) Respondents/NAICS Codes**

From the list of North American Industry Classification System (NAICS) Codes the associated industries that may be affected by this ICR are:

- 445110 Supermarkets

**b) Information Requested**

EPA's GreenChill Program specifies reporting for Partners. Companies voluntarily choosing to become GreenChill Partners must sign and submit a two-page Partnership Agreement (and added worksheet for food retailers). Following a compliance review, the company is accepted into the Partnership. The Partnership Agreement identifies the company's points of contact.

Food retail Partners then develop a Refrigeration Management Plan within 12 months of joining. The GreenChill Program Refrigerant Management Plan facilitates development of a strategy for how Partners will identify non-regulatory refrigerant emission reduction activities they intend to undertake, plan for new activities, and develop mechanisms for tracking refrigerant emission reduction data and activities. A Refrigerant Management Plan can be changed as Partners consider and potentially revise their goals.

After joining the Program, food retail Partners submit an annual Refrigerant Management Plan and the Annual Report on corporate emissions and installed refrigerants documenting the previous year's emission reduction activities and corresponding refrigerant emissions reductions. Refrigerant systems manufacturing partners submit an annual system sales report.

An individual food retailer that voluntarily seeks to obtain GreenChill Store Certification at one of multiple tiered levels must submit the store certification application which asks stores to complete an application form and provide the required supporting documentation materials. Certifications are valid for 12 months, at which point the food retail location must re-apply to maintain certification.

**Partnership Agreement**

GreenChill Partners sign and submit to EPA the two-page Partnership Agreement and added worksheet that describes the terms of participation in the Program.



## (i) Data items:

Partners provide the following information in the Partnership Agreement:

- The name, title, address, telephone and facsimile numbers, and e-mail address of the primary Implementation Manager for the GreenChill Program,
- The worksheet to self-identify as a small format food retailer or a large format food retailer, and
- The name and signature of the Partners' Authorized Company Representative.

## (ii) Respondent activities:

In signing the Partnership Agreement, Partners perform the following activities:

- Review the responsibilities outlined for a GreenChill Partner and for EPA in the Program,
- Gather requested information, and complete the Partnership Agreement and worksheet, and
- Sign the Partnership Agreement and submit it to EPA.

**Refrigerant Management Plan**

Food retail Partners complete and submit a GreenChill Refrigerant Management Plan within a year of signing the Partnership Agreement.

## (i) Data items:

There is no specific format for the Refrigerant Management Plan. GreenChill companies have individual formats used for describing the company's refrigeration management activities and planned changes to stores. The Partners can also choose to use a model of a Refrigerant Management Plan (see Annex I). The Program does require that each Partner's Refrigerant Management Plan include a refrigerant emission reduction goal for the coming calendar year.

The requested data elements in every Refrigerant Management Plan are:

- General company information (e.g., company name and contact, position, mail and e-mail addresses, telephone and facsimile numbers),
- Company's refrigerant emission rate goal for the year, and
- Summary of activities that the Partner intends to implement (e.g., numbers of stores with old equipment to be retrofitted, continued or new practices to reduce refrigerant emissions).

## (ii) Respondent activities:

Partners conduct the following activities in preparing the Refrigerant Management Plan:

- Review the instructions,
- Gather the requested information and develop the Refrigerant Management Plan, and
- Submit the plan to EPA.

### **Annual Report**

Annual reporting is key to remain an active Partner in the GreenChill Program. Upon acceptance into the Partnership, EPA asks food retail Partners to submit an Annual Report that documents corporate-wide installed quantities of refrigerants for the year the Partnership Agreement is completed, or for up to two years prior. This initial Annual Report is used to establish a base year for the Partner company. EPA also asks that this initial Annual Report include the corporate-wide refrigerant emissions for this same base year. The initial Annual Report, and every subsequent one, includes the total number of stores used to define corporate-wide data submission. EPA guidance recommends the Partner companies pick a fixed date in the year for determining the number stores for Annual Reporting, noting there are changes over a year due to closings, new construction, as well as acquisitions and sales of stores. Additionally, systems manufacturing partners must submit an annual systems sales data report.

(i) Data items:

The Annual Report form requests the following information from food retail Partners:

- Company name,
- Number of stores included in the data for the reporting calendar year (this defines the limits of the corporate-wide reporting for a Partner),
- Refrigerated space,
- Amount of specific refrigerants (e.g., R-22, R-134a, R-407A) installed. This is collected by a company on a set date each year to help allow for comparisons across years for the company, and to account for store closings and openings. Data on amounts of specific refrigerants is provided for several categories:
  - Commercial refrigeration equipment with a charge of equal to or greater than 50 lbs. (agreed to in the Partnership agreement),
  - Commercial refrigeration equipment with a charge of less than a 50 lbs.,
  - Heating, ventilation, and air-conditioning equipment, and
- Amount of specific refrigerants emitted during the calendar year reporting period, for the same categories as those installed. This information along with the number of stores reported by the company and the total amount of installed refrigerant is used to develop the weighted-average emission reduction aggregated for all reporting GreenChill Partner companies.

The Annual Report form requests the following information from systems manufacturing

Partners:

- Company name, and
- Number of units/racks sold for specific system types [Centralized DX, Distributed DX, Carbon Dioxide (CO<sub>2</sub>) Transcritical, CO<sub>2</sub> Cascade, CO<sub>2</sub> Secondary Loop, Glycol Secondary Loop, Brine Secondary Loop, Other, Micro-Distributed (in-store), Micro-Distributed (backroom)].

(ii) Respondent activities:

Partners conduct the following activities to prepare the Annual Report:

- Review the instructions,
- Gather the requested information for the initial report,
- Complete the initial Annual Report form,
- Sign and date the initial report,
- Submit the initial report to EPA, and
- Prepare and submit subsequent Annual Reports.

### **Additional Activities**

During participation in the Program, Partners are required to notify EPA of any change in GreenChill Program designated liaison.

(i) Data items:

- Partner must provide EPA with the name of the new designated liaison.

(ii) Respondent activities:

- Notify EPA of any change in GreenChill designated liaison.

### **Store Certification**

An individual food retailer may voluntarily seek to obtain GreenChill certification by providing information on the store certification application.

(i) Data items:

The store certification application asks for the following information:

- General store information (e.g., company name and contact, position, mail and e-mail addresses, telephone and facsimile numbers, calendar year covered by report),
- The refrigerant charge in the commercial refrigeration system and the type

of system; the total cooling load for the equipment (MBTU/hr); the annual refrigerant emission rate from this commercial refrigeration equipment; listing of the type of refrigerant in the commercial system; the refrigerant charge for heating, ventilation, and air conditioning equipment and any self-contained refrigerated equipment in the store (see attached instructions and certification application forms), and

- For newly constructed stores, a certification from the installing company that the leak tightness testing protocol was followed to ensure a leak-tight installation (see attached instructions and verification form).

(ii) Respondents Activities

A store that is voluntarily seeking to obtain GreenChill Store Certification would participate in the following activities:

- Read the instructions for store certification,
- Obtain the information from the companies that provided the store's refrigeration equipment,
- Compile the information and complete the store certification application form,
- Sign and date the form, and
- Submit the form and accompanying information to EPA.

## 5) THE INFORMATION COLLECTED-AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

### a) Agency Activities

Under the GreenChill Program, EPA performs activities after a Partner submits the Partnership Agreement, the Refrigeration Management Plan, and the Annual Report.

#### **Partnership Agreement**

EPA performs the following activities upon receipt of a Partnership Agreement:

- Review the Partnership Agreement to ensure completeness and accuracy, and follow up, if necessary,
- Conduct a compliance screen of the prospective Partner company,
- Countersign the Partnership Agreement,
- Develop a cover letter and welcome packet with useful program information,
- Send cover letter, original Partnership Agreement with countersign, and welcome packet to Partner,
- Maintain copies of cover letters and Partnership Agreement, and
- Enter Partner company information and Partner category into tracking database.

### **Refrigerant Management Plan**

EPA performs the following activities upon receipt of a Refrigerant Management Plan:

- Review the plan to ensure completeness and accuracy, and follow up, if necessary,
- Maintain copies of the plan, and
- Enter information into a tracking database.

### **Annual Report**

EPA performs the following activities upon receipt of an Annual Report:

- Review the report to ensure completeness and accuracy, and follow up, if necessary,
- Maintain copies of the report, and
- Enter information into an emissions reduction data management database.

### **Additional Activities**

EPA also may perform the following additional activity:

- Enter any changes in Partner's information into a database (e.g., new Partner company liaison, newsletter mailing list, etc.).

### **Store Certification**

EPA performs the following activities upon receipt of a store certification application:

- Acknowledge the submission of an application,
- Review the application to ensure completeness and accuracy, and follow-up, if necessary,
  - Review the information to determine if the store meets the criteria for a certification level, and
  - Communicate with the submitter the level of certification, if any.

## **b) Collection Methodology and Management**

In collecting and analyzing the information associated with this ICR, EPA uses typical office equipment such as telephones, computers, and database and word processing software systems.

For the collection of Program information, GreenChill developed various templates and tools to assist Partners and to encourage data consistency in submissions. The standard GreenChill reporting forms are available in Microsoft Excel or Microsoft Word.

EPA ensures the accuracy and completeness of collected information by reviewing each submittal. EPA enters the information obtained from the Partnership Agreement and the Annual Reports into data analysis software and aggregates data obtained from Annual Reports to track the progress of Partners in reducing refrigerant emissions. The information submitted in the Refrigerant Management Plans is reviewed and is used in communicating with Partners to ask clarifying questions about activities described in the Plan.

#### **c) Small Entity Flexibility**

This section does not apply; small entities are able to participate in the GreenChill program without additional flexibility.

#### **d) Collection Schedule**

EPA collects initial information in the two-page Partnership Agreement and added worksheet, which is completed and submitted by each Partner upon their voluntary decision to participate in the Program. EPA collects information in the Refrigeration Management Plan within 12 months after a Partner signs the Partnership Agreement. Each spring, EPA collects information in the Annual Report to monitor refrigerant emissions reductions progress. Each spring, EPA also collects a Refrigerant Management Plan from food retailers for the year, including the Partner's refrigerant emission reduction goal for the calendar year. EPA may also collect other Program information on a periodic basis or as the information is submitted. This could include notification of changes in a Partner's operating circumstance (change in ownership, sale or acquisition of stores, etc.). Submission of store certification applications is based on the desire and schedule of the submitter and is voluntary.

### **6) ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

#### **a) Estimating Respondent Burden**

EPA used input from GreenChill Partners and its experience implementing the Program to estimate burden for respondents. EPA calculated average burden and cost estimates for each respondent activity.

Tables 2a and 2b present the burden hours and costs per respondent for the first, second, and third years in the program. The burden hours in the second and third years are less than the first year. A one-time burden in the first year is associated with completing the Partnership Agreement and worksheet. The Partners indicated the hours required to collect and provide the information for the Refrigerant Management Plan and Annual Report would be less in the second and third years due to a better understanding of the requirements and the experience gained in the first year.

Table 4 presents the estimated annual aggregate burden hours and costs for all respondents during each of the three years covered under this ICR as shown in Tables 2a and 2b.

The annual reporting burden for each Partner for this information collection is estimated to be 22.6 hours for the first year and 12.4 hours per year for the second and third years.

Tables 5a and 5b present the estimated burden hours and estimated costs for one store certification application for both the applicant and for the agency together. Recently, EPA has received about 700 store certification applications each calendar year. The number of applications is expected to increase by approximately 10% each year resulting in a 3-year average of 770 applications. The burden hours represent a robust average – recognizing that certification applications vary (e.g., equipment type, number of equipment, first time application, repeat recertification, etc.) relative to one another.

## **b) Estimating Respondent Costs**

### **(i) Estimating Labor Costs**

To determine respondent costs, hourly wage rates for manager, technical, clerical, legal, consultant staff are derived from the U.S. Bureau of Labor Statistics. Median hourly wages are multiplied by a factor of 2.1 to reflect the estimated additional costs for overhead.

- Manager: \$56.67, adjusted to \$119.01 (NAICS 445000, Code 11-1011)
- Technical: \$47.94, adjusted to \$100.67 (NAICS 445000, Code 11-3013)
- Clerical: \$23.51, adjusted to \$49.37 (NAICS 445000, Code 43-6011)
- Legal: \$72.18, adjusted to \$151.58 (NAICS 541100, Code 23-1011)
- Consultant: \$43.85, adjusted to \$92.09 (NAICS 541600, Code 15-1242)

### **(ii) Estimating Capital and Operations and Maintenance (O&M) Costs**

To develop respondent capital and O&M cost estimates, EPA consulted with members of the food retail industry and commercial refrigeration industry supporting retail food. EPA believes that the capital or operations and maintenance costs of this Program are not significant.

### **(iii) Capital/Start-up vs. O&M Costs**

There are no capital/start-up costs or O&M costs associated with this information collection.

### **(iv) Annualizing Capital Costs**

There are no capital costs associated with this information collection.

## **c) Estimating Agency Burden and Costs**

Tables 3a and 3b present the estimated Agency burden hours and costs for the information collection activities associated with this ICR.

The base hourly rates for EPA technical and managerial staff are \$51.18 and \$71.15, respectively, based on the U.S. Office of Personnel Management 2022 General Schedule (GS) Locality Pay Table for the Washington, D.C., Baltimore, MD, and Arlington, VA, areas. These rates are multiplied by 1.6, the standard government benefits multiplier, and the adjusted hourly rates are \$81.89 and \$113.84, respectively.

#### **d) Estimating the Respondent Universe and Total Burden and Costs**

The majority of GreenChill Partners are large companies. Many major food retailer companies have joined the Program as have most of the major companies that manufacture and install multiplex refrigeration systems (containing multiple compressors). Based on recent Program activity, EPA anticipates that an average of two new Partners will join the Program annually. Due to consolidations, acquisitions, and bankruptcy within the food retailer industry, EPA anticipates an average loss of one Partner from the Program annually.

The average annual cost and burden estimates during the next three-year ICR period are based on the average number of Partners as shown in Table 1.

Table 1. Estimated Number of Program Partners in Calendar Years 2022-2024

Type of Partner	2022	2023	2024	Average
New Partners Enrolled Each Year	2	2	2	
Loss of Partner in Each Year	0.5	0.5	0.5	
Total Program Partners	35.5	36.5	37.5	36.5

#### **Partnership Agreement**

Each new Partner completes and submits a two-page Partnership Agreement and worksheet to join the Program. EPA expects an average of two new Partners completing and submitting a Partnership Agreement each year.

For new Partners, the average reporting burden per Partner for information collection requirements associated with completing the Partnership Agreement is estimated as 5.5 hours. The burden estimate includes time to receive and review the Partnership Agreement, gather information and fill out the Partnership Agreement and worksheet, and sign and submit the Partnership Agreement to EPA.

#### **Refrigerant Management Plan**

Each new food retail Partner completes and submits their Refrigerant Management Plan within a year of signing and submitting the Partnership Agreement. EPA estimates that 98 percent of all existing Partners (or 35 out of 36 Partner companies) will update their Refrigerant Management Plan and submit it to EPA each year. On average, due to staffing changes or other circumstances one Partner does not submit the Refrigerant Management Plan.



For new Partners, the average reporting burden per Partner for information collection requirements associated with completing the Refrigeration Management Plan is estimated as 8.5 hours. For years after the first year, the average reporting burden per Partner for information collection requirements associated with completing the Refrigeration Management Plan is estimated as 7.4 hours. The burden estimate includes time to review the plan form, gather the requested information, complete the form, sign and date the form, and submit the form to EPA.

### **Annual Report**

All food retail and system manufacturing Partners complete and submit an Annual Report after joining the Program and then annually in the subsequent years of participation. EPA estimates that completing the initial Annual Report will take approximately twice as long as subsequent Annual Reports. EPA expects that the two new Program Partners joining each year will complete and submit an initial report and an average of 36 existing Partners (as shown in Table 1) will complete and submit subsequent annual reports.

For new Partners, the average per Partner reporting burden for information collection requirements associated with completing the initial Annual Report is estimated as 8.3 hours. The average per Partner reporting burden for information collection requirements associated with completing subsequent Annual Reports is estimated as 4.7 hours. The burden estimate includes time to review the reporting package (forms and any Program updates), gather the requested information, complete the form, sign and date the form, and submit the form to EPA.

### **Additional Activities**

EPA expects that some Partners will submit additional information during a year. EPA estimates that approximately 20 percent of all Partners experience changes in their representative liaison each year. Thus, EPA estimates that an average of seven Partners ( $36 * 0.2$ ) will notify EPA of changes in the representative liaison.

For GreenChill Partners, the average per Partner reporting burden for information collection requirements associated with additional activities is estimated as 1.5 hours. The reporting burden includes time to notify EPA of changes in GreenChill liaison.

## **e) Bottom Line Burden Hours and Costs**

### **(i) Respondent Tally**

The estimated annual average bottom line burden for all respondents in the Partnership Program is approximately 473 hours per year with a cost of approximately \$47,237. The estimated annual average bottom line burden for all respondents in the Store Certification Program is approximately 5,390 hours per year with a cost of approximately \$442,474. Over the three-year period covered by this ICR, EPA estimates the average annual burden of the overall Program as 5,863 hours and \$489,711.

(ii) The Agency Tally

The estimated average annual burden to the Agency for the Partnership Program is approximately 64 hours and \$4,983. The estimated average annual burden to the Agency for the Store Certification Program is approximately 1,540 hours and \$128,568. Over the three-year period covered by this ICR, EPA estimates the average annual burden of the overall Program as 1,604 hours and \$133,550.

(iii) Variations in the Annual Bottom Line

EPA anticipates minimal variation in the annual respondent reporting/recordkeeping burden over the three-year period covered by this ICR.

**f) Reasons for Change in Burden**

In this renewal of the ICR for the GreenChill Program, adjustments update and increase the number of Partner companies submitting the Annual Report and the Refrigeration Management Plan reflecting industry consolidation, acquisitions and bankruptcy, and the number of companies newly joining the Partnership. Moreover, the number of stores voluntarily submitting applications for GreenChill Store Certification each year has grown substantially from 200 stores in the previous ICR to 700 stores in this ICR. An annual growth rate of 10% based on historical trend data in the number of store certification applications was applied in this ICR whereas no such growth rate was assumed in the previous ICR.

Regarding the Partnership Program, the agency burden to: 1) answer questions from potential Partners, 2) review the Partnership agreement and check for compliance, 3) answer questions regarding the refrigerant management plan and to review it, 4) review the emissions goal of Partners, and 5) develop charts based on Partner goals and data submitted decreased due to efficiency gains (e.g., increased staff proficiency, automating and coding some of the analytical processes, etc.) in recent years. In the previous ICR, the agency burden to review the completed annual reports was listed as 16 hours. This was likely a discrepancy in units. 16 hours is more akin to the review time in total, but on a per respondent basis, the value has been updated to 0.1 hours of technical staff and 0.3 hours of consultant staff.

Regarding the Store Certification Program, the respondent burden to: 1) gather information, verifications, and appropriate documents and to 2) complete the application form were updated and decreased due to efficiency gains (e.g., increased staff proficiency, ability to leverage and carryover information from previous years, etc.). The agency burden and ability to review store certification applications in relation to the criteria also decreased due to efficiency gains (e.g., increased staff proficiency, some review process automation and bulk processing).

The respondent submission and agency review of “additional” information by an estimated 20% of the Partners each year was mentioned in the previous ICR but did not explicitly appear to be in the calculation tables. They are now included in this ICR’s tables.

Overall, the end result is that while the respondent burden for the annual reporting and per individual certification application remains similar to the previous ICR notwithstanding the increase on labor wages, the cumulative burden to the agency has increased, but is somewhat mitigated by efficiency gains (e.g., automating and coding some of the analytical processes) in recent years.

### **g) Burden Statement**

The annual reporting and recordkeeping burden for this collection of information is estimated to average 13.0 hours per response for the Partnership Program and 7.0 hours per response for the Store Certification Program.

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-2022-0449, 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-2022-0449 and OMB Control Number 2060-0702 in any correspondence.



Select base year and aggregate information on installed refrigerant and emissions	1.6	0.5	1.3	0	0.9	4.3	\$387.81	\$0.00
Complete the Annual Report form	1.2	0.8	1.7	0	0	3.7	\$307.28	\$0.00
Sign and submit the Annual Report to EPA	0.2	0	0.1	0	0	0.3	\$28.74	\$0.00
<b>SUBTOTAL</b>						8.3	\$723.82	\$0.00
<b>Additional Activities</b>								
Submit additional information	0	0.1	0.2	0	0	0.3	\$19.94	\$0.00
<b>SUBTOTAL</b>						0.3	\$19.94	\$0.00
<b>Total</b>						22.6	\$2,280.85	\$0.00

**Table 2b. Partnership Program Estimated Individual Respondent Burden -- Year 2 and Subsequent Years  
Hours and Costs per Respondent/Activity -- Year 2 and subsequent years**

Information Collection Activity	Manager	Technical	Clerical	Legal	Consultant	Respond. Hrs. / Activity	Labor Costs / Activity	Annual O&M Costs
	\$ 119.01 Hours	\$ 100.67 Hours	\$ 49.37 Hours	\$ 151.58 Hours	\$ 92.09 Hours			
<b>Refrigerant Management Plan</b>								
Gather information and develop Plan	1.8	0.6	0.3	0	0	2.7	\$289.43	\$0.00
Develop an emission reduction goal for next year	1.8	0.6	0.6	0	0	3	\$304.24	\$0.00

Gain corporate approval for Plan	1	0	0	0.2	0.2	1.4	\$167.74	\$0.00
Sign and submit the Plan to EPA	0.2	0	0.1	0	0	0.3	\$28.74	\$0.00
<b>SUBTOTAL</b>						7.4	\$790.15	\$0.00
<b>Annual Report</b>								
Select base year and aggregate information on installed refrigerant and emissions	1.1	0.4	0.1	0	0.7	2.3	\$240.57	\$0.00
Complete the Annual Report form	0.7	0.1	1.3	0	0	2.1	\$157.55	\$0.00
Sign and submit the Annual Report to EPA	0.2	0	0.1	0	0	0.3	\$28.74	\$0.00
<b>SUBTOTAL</b>						4.7	\$426.87	\$0.00
<b>Additional Activities</b>								
Submit additional information	0	0.1	0.2	0	0	0.3	\$19.94	
<b>SUBTOTAL</b>						0.3	\$19.94	
Total						12.4	\$1,236.95	\$0.00

**Table 3a. Partnership Program Estimated Agency Burden -- Year 1**

Information Collection Activity	Hours and Costs per Respondent/Activity -- Year 1					Partners (Estm Annual)	Hours Total	Labor Total	Annual O&M Costs
	Manage	Technic	Consultan	Agency	Labor				
	\$	\$81.89	\$	Hrs. / Activity	Costs / Activity				
	Hours	Hours	Hours						
<b>Partnership Agreement</b>									
Answer questions from potential Partners	0	0.5	0	0.5	\$ 40.94	2	1	\$ 81.89	\$0.00
Review completed Partnership Agreement, check compliance, record information	0	0.2	0	0.2	\$ 16.38	2	0.4	\$ 32.76	\$0.00
Sign the Partnership Agreement and return to the Partner	0.3	0	0	0.3	\$ 34.15	2	0.6	\$ 68.30	\$0.00
<b>SUBTOTAL</b>				1	\$ 91.47		2	\$ 182.95	
<b>Refrigerant Management Plan</b>									
Answer questions from Partner on completing a Plan	0	0.1	0	0.1	\$ 8.19	35.5	3.55	\$290.70	\$0.00
Review the Partner company's Plan	0	0.2	0	0.2	\$ 16.38	35.5	7.1	\$581.40	\$0.00
Record the emission goal and file the Partner's submission	0	0.1	0	0.1	\$ 8.19	35.5	3.55	\$290.70	\$0.00
Develop charts based on Partner's goals compared to prior year	0	0	0.2	0.2	\$ 14.66	35.5	7.1	\$520.55	\$0.00
<b>SUBTOTAL</b>				0.6	\$ 47.42		21.3	\$1,683.36	\$0.00



<b>Annual Report</b>										
Review complete Annual Report	0	0.1	0.3	0.4	\$ 30.18	35.5	14.2	\$1,071.53	\$0.00	
Enter data in GreenChill Partner tracking system	0	0.0	0.4	0.4	\$ 29.33	35.5	14.2	\$1,041.10	\$0.00	
<b>SUBTOTAL</b>				0.8	\$ 59.51		28.4	\$2,112.63	\$0.00	
<b>Additional Activities</b>										
Review additional information	0	0.3	0	0.3	\$ 24.57	35.5	10.7	\$872.11	\$0.00	
<b>SUBTOTAL</b>				0.3	\$ 24.57		10.7	\$872.11	\$0.00	
Total				2.7	\$ 222.97		62.4	\$4,851.05	\$0.00	

**Table 3b. Partnership Program Estimated Agency Burden -- Year 2 and Subsequent Years**

**Hours and Costs per Respondent/Activity -- Year 2 +**

Information Collection Activity	Manage Technical Consultant			Agency Hrs. / Activity	Labor Costs / Activity	Partners (Estm Annual)	Hours Total	Labor Total	Annual O&M Costs
	Hours	Hours	Hours						
<b>Partnership Agreement</b>									
Answer questions from potential Partners	0	0.5	0	0.5	\$40.94	2	1	\$81.89	\$0.00
Review completed Partnership Agreement, check compliance, record information	0	0.2	0	0.2	\$16.38	2	0.4	\$32.76	\$0.00
Sign the Partnership Agreement and return to the Partner	0.3	0	0	0.3	\$34.15	2	0.6	\$68.30	\$0.00
<b>SUBTOTAL</b>				1	\$91.47		2	\$182.95	
<b>Refrigerant Management Plan</b>									
Answer questions from Partner on completing a Plan	0	0.1	0	0.1	\$8.19	36.5	3.65	\$298.89	\$0.00
Review the Partner company's Plan	0	0.2	0	0.2	\$16.38	36.5	7.3	\$597.78	\$0.00
Record the emission goal and file the Partner's submission	0	0.1	0	0.1	\$8.19	36.5	3.65	\$298.89	\$0.00
Develop charts based on Partner's goals compared to prior year	0	0	0.2	0.2	\$14.66	36.5	7.3	\$535.22	\$0.00
<b>SUBTOTAL</b>				0.6	\$47.42		21.9	\$1,730.78	\$0.00

<b>Annual Report</b>									
Review complete Annual Report	0	0.1	0.3	0.4	\$ 30.18	36.5	14.6	\$1,101.71	\$0.00
Enter data in GreenChill Partner tracking system	0	0.0	0.4	0.4	\$ 29.33	36.5	14.6	\$1,070.43	\$0.00
<b>SUBTOTAL</b>				0.8	\$ 59.51		29.2	\$2,172.15	\$0.00
<b>Additional Activities</b>									
Review additional information	0	0.3	0.0	0.3	\$ 24.57	36.5	10.95	\$896.67	\$0.00
<b>SUBTOTAL</b>				0.3	\$ 24.57		10.95	\$896.67	\$0.00
Total				2.7	\$ 222.97		64.05	\$4,982.55	\$0.00

**Table 4. Partnership Program Total Estimated Burden & Cost for Respondents in Year 1 and Subsequent Years**

<b>Information Collection Activity</b>	Number of Year 1 Respondents / Activity	Total Burden Year 1 / Activity	Total Costs for Year 1 / Activity	Average Respondents in Year 2 and Subsequent Years / Activity	Total Avg. Burden in Year 2 and Subsequent Years / Activity	Total Avg. Costs for Year 2 and Subsequent Years / Activity
<b>Partnership Agreement</b>						
Receive and review the Partnership Agreement	2	6.4	\$804.55			
Gather information and complete the Partnership Agreement	2	3.8	\$445.94			
Sign and submit the Partnership Agreement to EPA	2	0.8	\$53.42			
<b>SUBTOTAL</b>		11	\$1,303.92		-	\$ -
<b>Refrigerant Management Plan</b>						
Gather information and develop Plan	2	7.4	\$745.02	34.5	93.15	\$9,985.28
Develop an emission reduction goal for next year	2	6.2	\$632.28	34.5	103.5	\$10,496.27
Gain corporate approval for Plan	2	2.8	\$335.48	34.5	48.3	\$57.87.02
Sign and submit the Plan to EPA	2	0.6	\$47.48	34.5	10.35	\$991.48
<b>SUBTOTAL</b>		17.0	\$1,770.25		255.3	\$27,260.04
<b>Annual Report</b>						
Select base year and aggregate information on installed refrigerant and emissions	2	8.6	\$775.61	34.5	79.35	\$8,299.80
Complete the Annual Report form	2	7.4	\$614.56	34.5	72.45	\$5,435.63
Sign and submit the Annual Report to EPA	2	0.6	\$57.58	34.5	10.35	\$991.48
<b>SUBTOTAL</b>		16.6	\$1,447.65		162.2	\$14,726.91
<b>Additional Activities</b>						

Submit additional information	2	0.6	\$39.88	34.5	10.4	\$687.99
<b>SUBTOTAL</b>		0.6	\$39.88		10.35	\$687.99
Total		45.2	\$4,561.70		427.8	\$42,674.93

**Table 5a. Estimated Burden and Cost for a Store Certification Application<sup>a</sup> -- Year 1**

		Hours and Costs per Respondent/Activity -- Year 1								
Information Collection Activity	Manag	Technic	Cleric	Respon	Labor	O&M	Stores	Total Hours	Total Labor Costs	Total O&M Costs
	\$	\$	\$	d. Hrs.	Costs /	Costs /	(Estm. Annua			
	119.01	100.67	49.37	/	Activity	Activity	l)			
	Hours	Hours	Hours	Activity						
<b>Respondent Information Collection Activity</b>										
Review instructions and obtain appropriate application form	0.2	0.5	0.5	1.2	\$98.82	\$0.00	700	840	\$69,176.73	\$0.00
Gather information, verifications, and appropriate documents	1	2	1	4	\$369.73	\$0.00	700	2,800	\$258,808.20	\$0.00
Complete the application form	0.1	0.2	1	1.3	\$81.41	\$0.00	700	910	\$56,984.55	\$0.00
Send the application form and associated documents	0	0	0.5	0.5	\$24.69	\$0.00	700	350	\$17,279.85	\$0.00
<b>SUBTOTALS</b>	<b>1.3</b>	<b>5.7</b>	<b>3</b>	<b>7</b>	<b>\$574.64</b>	<b>\$0.00</b>		<b>4,900</b>	<b>\$402,249.33</b>	<b>\$0.00</b>
	Manag	Technic		Agency	Labor	O&M		Total	Total	
	\$	\$		Hrs. /	Costs /	Costs /		Hours	Labor	
	113.84	81.89		Activity	Activity	Activity			Costs	
	Hours	Hours								
<b>Agency Information Collection Activity</b>										
Receive and acknowledge	0	0.2		0.2	\$ 16.38	\$0.00	700		\$	\$0.00

application								140	11,464.32	0
Review for completeness & accuracy, contact if necessary	0	0.5		0.5	\$40.94	\$0.00	700	350	\$ 28,660.80	\$0.00
Review in relation to criteria	0	1		1	\$81.89	\$0.00	700	700	\$57,321.60	\$0.00
Send communication about certification	0.1	0.2		0.3	\$27.76	\$0.00	700	210	\$19,433.12	\$0.00
<b>SUBTOTALS</b>	<b>0.1</b>	<b>1.9</b>		<b>2</b>	<b>\$166.97</b>	<b>\$0.00</b>		<b>1,400</b>	<b>\$116,879.84</b>	<b>\$0.00</b>

<sup>a</sup> The estimated number of applications received per year is reported for Year 1 and is expected to increase by 10% annually.





Receive and acknowledge application	0	0.2		0.2	\$ 16.38	\$0.00	770	154	\$ 12,610.75	\$0.00
Review for completeness & accuracy, contact if necessary	0	0.5		0.5	\$ 40.94	\$0.00	770	385	\$31,526.88	\$0.00
Review in relation to criteria	0	1		1	\$81.89	\$0.00	770	770	\$63,053.76	\$0.00
Send communication about certification	0.1	0.2		0.3	\$27.76	\$0.00	770	231	\$21,376.43	\$0.00
<b>SUBTOTALS</b>	<b>0.1</b>	<b>1.9</b>		<b>2</b>	<b>\$166.97</b>	<b>\$0.00</b>		<b>1,540</b>	<b>\$128,567.82</b>	<b>\$0.00</b>

<sup>a</sup> The estimated number of applications is expected to increase by 10% annually.