

Information Collection Request Supporting Statement

PART A OF THE SUPPORTING STATEMENT

NATIONAL REFRIGERANT RECYCLING AND EMISSIONS REDUCTION PROGRAM

1. Identification of the Information Collection

(a) Title and Number of the Information Collection

Title: National Refrigerant Recycling and Emissions Reduction Program

OMB Control Number: 2060-0256; EPA ICR Number: 1626.18

(b) Characterization/Abstract

Section 608 of the Clean Air Act (CAA), also known as the *National Recycling and Emission Reduction Program* (the Program), directs the Environmental Protection Agency (EPA) to issue regulations governing the use of ozone-depleting substances (ODS), including chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs), during the maintenance, service, repair, or disposal of air-conditioning and refrigeration appliances. Section 608 also prohibits knowingly venting or releasing ozone-depleting and substitute refrigerants in the course of maintaining, servicing, repairing, or disposing of appliances or industrial process refrigeration except for *de minimis* releases associated with good faith attempts to recycle or recover refrigerants. For clarity and consistency in this document, the term “ozone-depleting refrigerant” or “ODS refrigerant” means any substance, including blends and mixtures, consisting in part or whole of a class I or class II ozone-depleting substance that is used for heat transfer purposes and provides a cooling effect. *Class I* refers to an ozone-depleting substance that is listed in 40 CFR part 82 subpart A, appendix A. *Class II* refers to an ozone-depleting substance that is listed in 40 CFR part 82 subpart A, appendix B.¹

The regulations require persons servicing refrigeration and air-conditioning appliances to follow certain service practices that reduce emissions of refrigerants.² The regulations also establish certification programs for technicians, recovery/recycling equipment, and refrigerant reclamation. In addition, EPA requires that refrigerants contained in appliances be removed prior

¹ Class I substances, such as chlorofluorocarbons (CFCs) and halons, have a higher ozone depletion potential and have been phased out in the U.S.; with a few exceptions, this means no one can produce or import class I substances. Class II substances are all hydrochlorofluorocarbons (HCFCs), which are transitional substitutes for many class I substances. New production and import of most HCFCs were phased out in 2020.

² Under section 608(c)(2) of the CAA, the agency may exempt certain releases of substitute refrigerants from the venting prohibition, if the Administrator has determined that “venting, releasing, or disposing of such substance does not pose a threat to the environment.” A list of the refrigerant that are exempt from the venting prohibition, and the applications for which they are exempt can be found at 40 CFR 82.154(a). All other refrigerants are “non-exempt” refrigerants.

to disposal of the appliances and that all refrigeration and air-conditioning appliances be provided with a servicing aperture that facilitates recovery of the refrigerant. The Agency requires that substantial refrigerant leaks in appliances containing ozone-depleting refrigerant be repaired when they are discovered. Compliance with these regulations significantly reduce emissions of refrigerants, and therefore aid U.S. and global efforts to minimize damage to the ozone layer and the environment as a whole.

To facilitate compliance with and enforcement of Section 608 regulations, EPA requires reporting and recordkeeping from: technician certification programs; equipment testing organizations; refrigerant wholesalers; refrigerant reclaimers; refrigeration and air-conditioning appliance owners/operators; technicians; and other establishments that perform refrigerant removal, service, or disposal. OMB previously approved this collection under Information Collection Request (ICR) Number 1626.17 through April 30, 2023. Specific reporting and recordkeeping requirements were initially published May 14, 1993 (58 FR 28660) and codified at 40 CFR part 82, subpart F (§82.150 *et seq.*) and have been revised multiple times since—most recently in a rule finalized on March 11, 2020 (85 FR 14150).

EPA has estimated that there are 572,730 annual respondents consisting of representatives from the air-conditioning and refrigeration community. The annual cost for respondents for the collection and maintenance of records, as well as reporting to EPA, is estimated to total \$31,438,249

2. Need for and Use of the Collection

(a) Need/Authority for the Collection

This information collection is authorized under Section 608(a) of the CAA. This section directs the Administrator to “promulgate regulations establishing standards and requirements regarding the use and disposal” of ozone-depleting substances and to implement Section 608(c) which contains a statutory prohibition against venting of ODS and substitute refrigerants. EPA requires reporting and recordkeeping to facilitate compliance with and enforcement of the Section 608 requirements. In addition, EPA’s authority is supplemented by Section 114, which authorizes the EPA Administrator to require recordkeeping and reporting in carrying out any provision of the CAA.

(b) Practical Utility/Users of the Data

The purpose of the collection request is to facilitate compliance with and enforcement of Section 608 of the CAA including the prohibition on venting ODS refrigerants and non-exempt substitute refrigerants and to reduce emissions of class I and class II ozone-depleting refrigerants to the lowest achievable level during the maintenance, service, repair, and disposal of appliances. EPA has used and will continue to use these records and reports to ensure that refrigerant

releases are minimized during the refrigerant recovery, recycling, and reclamation processes.

Some recordkeeping requirements are intended to facilitate information sharing between regulated entities to ensure compliance with Section 608 requirements. Owners/operators of appliances containing ODS use the information provided by service technicians to ensure their systems are not leaking in violation of the regulations. Refrigerant wholesalers use the data provided by service technicians to ensure they are complying with the refrigerant sales restriction.

Most of the reporting requested from respondents under this ICR are to seek a benefit such as an extension to repairing or retrofitting an appliance leaking in violation of Section 608 requirements or to voluntarily become an organization to test and certify technicians or to test and certify recovery and recycling equipment.

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

(a) Non-duplication

With the exception of one type of data, the specific information requested is not currently collected by any other EPA office or any other government agency. Since ODS refrigerant reclamation is not addressed under any other collection, requiring the reporting of ODS and HFC reclamation data under this ICR on an annual basis ensures consistency for ODS and HFC programs.³

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

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the Federal Register on September 19, 2022 (87 FR 57194)

(c) Consultations

The burden calculations for this renewal were developed based on information from EPA's consultations for previous iterations of this ICR, as well as experience implementing the reporting and recordkeeping requirements.

(d) Effects of Less Frequent Collection

The information collection requirements are biannual, annual, one-time, or occasional submissions. The one-time submissions (e.g., applications for approval of technician certification organizations) and annual submissions (e.g., reclaimer annual reports) are required for EPA to

³ Data on reclamation of hydrofluorocarbons (HFCs), which were developed as replacements for among other uses, ODS refrigerants, is required annually under the National Refrigerant Recycling and Emissions Reduction Program, as well as quarterly under the ICR titled, "Hydrofluorocarbon Allowance Allocation and Trading Program" (OMB Control No. 2060-0734; EPA ICR Number 2685.02).

track changes in industry and for long-term management of the Program. Occasional submissions, such as requests for extensions to repair, retrofit, or retirement timelines apply only to ODS appliances, and are designed to allow entities flexibility in meeting regulatory requirements.

(e) General Guidelines

The reporting and recordkeeping requirements do not violate the regulations established by OMB at 5 CFR part 1320.5(d)(2).

(f) Confidentiality

EPA informs respondents that they may assert claims of business confidentiality for any of the information they submit. Information claimed confidential is treated in accordance with the procedures for handling information claimed as confidential under 40 CFR Part 2, Subpart B, and is disclosed only if EPA determines that the information is not entitled to confidential treatment. If no claim of confidentiality is asserted when the information is received by EPA, it may be made available to the public without further notice to the respondents (40 CFR 2.203). The handling and confidentiality of the reporting requirements for assuring computer data security, preventing disclosure, proper storage, and proper disposal follow EPA's confidentiality regulations (40 CFR 2.201 *et seq.*).

(g) Sensitive Questions

None of the reporting or recordkeeping requirements contain sensitive questions.

4. Respondents and Information Requested

(a) Respondents' NAICS Codes

Table 1 lists the North American Industry Classification System (NAICS) codes potentially affected by the information requirements covered under this ICR. These categories generally include owners/operators of industrial process refrigeration, commercial refrigeration, and comfort cooling appliances; plumbing, heating, and air-conditioning contractors; refrigerant wholesalers; manufacturers and distributors of small cans of automotive refrigerant; refrigerant reclaimers; disposers and recyclers of appliances; and testing and certifying organizations. These listings are not all-inclusive but are consistent with the types of organizations potentially impacted by this ICR.

Table 1: NAICS Codes of Potentially Affected Respondents

Industry Category	NAICS Code	NAICS Code Definition
Agriculture and Crop Support Services	115	Support Activities for Agriculture and Forestry
Arts, Entertainment, and Recreation	71	Arts, Entertainment, and Recreation

Industry Category	NAICS Code	NAICS Code Definition
Beverage and Ice Manufacturing	312	Beverage Manufacturing
Durable Goods Wholesalers and Dealers	423	Merchant Wholesalers - Durable Goods
	441	Motor Vehicle and Parts Dealers
Educational Services	611	Educational Services
Food Manufacturing	311	Food Manufacturing
General Merchandise Stores	452	General Merchandise Stores
	453998	All Other Miscellaneous Store Retailers (except Tobacco Stores)
Grocery and Specialty Food Stores	4451	Grocery Stores
	4452	Specialty Food Stores
	72231	Food Service Contractors
Hospitals	622	Hospitals
Non-durable Goods Wholesalers and Dealers	424	Merchant Wholesalers – Non-durable Goods
Non-food Manufacturing	322	Paper Manufacturing
	323	Printing and Related Support Activities
	324	Petroleum Manufacturing
	325	Chemical Manufacturing
	326	Plastics and Rubber Manufacturing
	332	Metals Manufacturing
	333	Machinery Manufacturing
	334	Computer and Electronic Product Manufacturing
	336	Transportation Equipment Manufacturing
	3254	Pharmaceutical Manufacturing
	3391	Medical Equipment and Supplies Manufacturing
339999	Miscellaneous Manufacturing	
Office Buildings	92	Public Administration
	511	Publishing Industries (except Internet)
	512	Motion Picture and Video Industries
	515	Broadcasting
	517	Telecommunications
	518	Data Processing, Hosting, and Related Services
	519	Libraries and Archives
	522	Credit Intermediation and Related Activities
	524	Insurance Carriers
	531	Real Estate
	541	Professional, Scientific, and Technical Services
551	Management of Companies and	

Industry Category	NAICS Code	NAICS Code Definition
		Enterprises
	561	Administrative and Support Services
	712	Museums, Historical Sites, and Similar Institutions
	721	Accommodation
	813	Religious, Grantmaking, Civic, Professional, and Similar Organizations
Other Warehousing, Storage, and Transportation	48	Transportation and Warehousing
	4931	Warehousing and Storage
Refrigerated Warehousing and Storage	49312	Refrigerated Warehousing and Storage
Research and Development	5417	Research and Development
Utilities	211	Oil and Gas Extraction
	221	Utilities
Warehouse Clubs and Supercenters	452910	Warehouse Clubs and Supercenters
Reclaimers	325120	Industrial Gas Manufacturing
	423930	Recyclable Material Merchant Wholesalers
	424690	Other Chemical and Allied Products Merchant Wholesalers
	562212	Solid Waste Landfill
	562920	Materials Recovery Facilities
Refrigerant Wholesalers	325120	Industrial Gas Manufacturing
	4237	Hardware and Plumbing and Heating Equipment and Supplies Merchant Wholesalers
	424690	Other Chemical and Allied Products Merchant Wholesalers
Service Technicians	238220	Plumbing, Heating, and Air-conditioning Contractors
Disposal Establishments	423990	Other Miscellaneous Durable Goods Merchant Wholesalers
	562212	Solid Waste Landfill
	562920	Materials Recovery Facilities
Service Establishments	811111	General Automotive Repair
	811310	Commercial Industrial Machinery and Equipment (not Automotive and Electronic) Repair and Maintenance
	811412	Appliance Repair and Maintenance
Small Can Manufacturers	325120	Industrial Gas Manufacturing
	441310	Automotive Parts and Accessories Stores
Certifying Organizations	541380	Environmental Test Laboratories and Services

(b) Information Requested

All records pursuant to this ICR must be available onsite at the respondents' place of business for a minimum of three years. EPA encourages entities to submit reports electronically. If the information submitted is claimed as confidential, EPA asks that information be submitted through EPA's Central Data Exchange using the ODS Program Service. If not claimed as confidential, information can be reported to 608reports@epa.gov. Entities may also submit reports by mail to: Section 608 Program Manager; Stratospheric Protection Division; Mail Code: 6205A; U.S. Environmental Protection Agency; 1200 Pennsylvania Avenue, NW; Washington, DC 20460.

1. Refrigerant Recovery/Recycling Equipment Testing Organizations

The data items required by organizations that test and certify refrigerant recovery/recycling equipment are specified in 40 CFR 82.160(a), (b), and (e).

(i) Data Items

- Application for approval by EPA to certify refrigerant recovery/recycling equipment (as applicable). Information includes:
 - ◆ List refrigerant recovery/recycling equipment present at the organization for testing;
 - ◆ Verification of expertise in refrigerant recovery/recycling equipment testing and the technical experience of the organization's personnel;
 - ◆ Verification of the organization's knowledge of the standards and recordkeeping and reporting requirements in 40 CFR Part 82, Subpart F; and
 - ◆ Description of the organization's program for verifying the performance of certified recycling and recovery equipment manufactured over the long term, specifying whether retests of equipment or inspections of equipment at manufacturing facilities will be used;
 - ◆ Verification that the organization has no conflict of interest and receives no direct or indirect financial benefit from the outcome of certification testing; and
 - ◆ Agreement to allow EPA access to records and personnel to verify the information contained in the application.
- Records of refrigerant recovery/recycling equipment testing and performance.
- List of certified refrigerant recovery/recycling equipment that includes the name of the manufacturer and the name or serial number of the model line.
- Notice of when a model of refrigerant recovery/recycling equipment fails a three-year recertification test.

(ii) Respondent Activities

- Prepare a one-time application to become an approved refrigerant recovery/recycling equipment testing organization.

- Retain records of recovery/recycling equipment testing and performance and refrigerant recovery/recycling equipment.
- Notify EPA within 30 days of retesting or inspection if equipment previously certified fails the periodic re-test required by the regulation.
- Publish online a list of all certified equipment and update the list annually.

2. Refrigerant Reclaimers

The data items required by reclaimers are specified in 40 CFR 82.164(d).

(i) Data Items

- Application for reclaimer certification by EPA, including a certification that the reclaimer will:
 - ◆ Reclaim refrigerant to all the specifications in Appendix A of Subpart F that are applicable to that refrigerant;
 - ◆ Verify that each batch of refrigerant reclaimed meets these specifications using the analytical methodology prescribed in Appendix A;
 - ◆ Release no more than 1.5 percent of the refrigerant during the reclamation process;
 - ◆ Dispose of wastes from the reclamation process in accordance with all applicable laws and regulations; and
 - ◆ Maintain records and submit reports.
- Records of the analysis conducted to verify that each batch of reclaimed refrigerant meets the necessary specifications.
- Records on the quantity of ODS and non-exempt substitute refrigerant (by ASHRAE type) sent for reclamation, the amount reclaimed, waste products from the reclamation process, and names and addresses of persons sending refrigerant for reclamation.
- Annual reports noting the total annual quantity of material (the combined mass of refrigerant and contaminants) by refrigerant type sent to them for reclamation, the mass of refrigerant reclaimed by refrigerant type, and the mass of waste products produced.

(ii) Respondent Activities

- Prepare a one-time application to become a certified refrigerant reclaimer.
- Maintain records of analyses conducted to verify that reclaimed refrigerant meets the necessary specifications.
- Maintain records of the names and addresses of persons sending material for reclamation and the quantity of the material (the combined mass of refrigerant and contaminants) by refrigerant type sent to them for reclamation.
- Prepare and submit to EPA annual reports detailing the quantity of each refrigerant sent for reclamation (the combined mass of refrigerant and contaminants), the mass of each refrigerant reclaimed, and the mass of waste products.

- Notify EPA within 30 days of a change in business management, location, or contact information.

3. Refrigerant Wholesalers

The data items required by refrigerant wholesalers are specified in 40 CFR 82.154(c)(3).

(i) Data Item

- Refrigerant sales records that indicate the name of the purchaser, the date of sale, and the quantity purchased as well as records indicating that the purchaser is a certified technician (as applicable).

(ii) Respondent Activities

- Retain invoices from refrigerant sales.

4. Technician Certification Programs

The data items required by technician certification programs are specified in 40 CFR 82.161(b) and 40 CFR Part 82, Subpart F, Appendix D.

(i) Data Items

- Prepare a one-time application to become an approved technician certification program. The application will verify:
 - ◆ Ability to produce multiple versions of examinations for each test site;
 - ◆ Sufficient internal capacity to process the scoring and the accompanying documentation; and
 - ◆ Ability to ensure the confidentiality and security of test questions and answers.
- Records of the names and addresses of all individuals taking the tests, the scores of all certification tests administered, and the dates and locations of all testing administered. These records must be retained indefinitely.
- List of technicians certified through the program, including:
 - ◆ First name, middle initial, and last name of the technician;
 - ◆ Technician's city of residence when taking the test;
 - ◆ Type(s) of certification received; and
 - ◆ Date each certification was completed.
- Biannual (2x/year) reports on pass/fail rates.

(ii) Respondent Activities

- Prepare and submit application to become a technician certification organization.
- Maintain records of testing events, scores of certification tests, and the dates and locations of tests.

- Maintain and publish online lists of technicians certified through programs after January 1, 2017.⁴
- Prepare and submit reports to EPA every six months on the pass/fail rate and testing schedules.
- Organizations that stop certifying technicians must transfer their records to another certifying program or EPA. Organizations that receive those records must inform EPA within 30 days.

5. Disposal Establishments

The data items required by disposal establishments are specified in 40 CFR 82.155(c).

(i) Data Item

- Copies of signed statements attesting that refrigerant has been recovered prior to the disposal of each appliance or copies of a contract from a supplier of multiple appliances that refrigerant will be recovered prior to delivery at the disposal establishment.

(ii) Respondent Activities

- Retain copies of signed statements or contracts for each piece of disposed appliance with the name and address of the person who recovered the refrigerant and the date the refrigerant was recovered.

6. Technicians

The data items required by technicians are specified in various provisions of subpart F as listed. EPA has rescinded the recordkeeping and reporting requirements for appliances with a charge size of 50 or more pounds of non-exempt substitute refrigerant (e.g., HFCs). The reporting and recordkeeping provisions at 40 CFR 82.157(l) and (m) apply to appliances containing ODS refrigerants.

(i) Data Items

- Proof of technician certification (40 CFR 82.161(a)(4)).
- Records of leak inspections and verification tests (40 CFR 82.157(l)).
- For appliances with 50 or more pounds of ODS refrigerant, service invoices to owners/operators with information on the identity and location of the appliance, the date and type of service performed, and the quantity and type of refrigerant added. (40 CFR 82.157(l)).
- Records for the disposal of appliances with charges between 5 and 50 pounds which include:
 - ◆ Company name, location of equipment, date of recovery, and types of refrigerant recovered for each appliance;
 - ◆ Quantity of refrigerant recovered from such appliances each calendar month; and

⁴ Technicians may opt out of this requirement.

- ◆ Quantity and types of refrigerant ultimately transferred for reclamation or destruction.

(ii) Respondent Activities

- Successfully complete a certification test.
- Maintain a copy of certification at their place of business.
- Prepare and provide service invoices to owners/operators with each servicing event of an appliance containing 50 or more pounds of ODS refrigerant.
- Prepare and provide records of leak inspections and verification tests on appliances containing 50 or more pounds of ODS refrigerant (only for appliances exceeding the threshold leak rate).
- Prepare and maintain the appropriate records when disposing of appliances with charges between 5 and 50 pounds.

7. Owners/Operators of Appliances with Charge Sizes of 50 or More Pounds

EPA has rescinded the recordkeeping and reporting requirements for owners and operators of appliances with a charge size of 50 or more pounds of non-exempt substitute refrigerant (e.g., HFCs). The reporting and recordkeeping provisions at 40 CFR 82.157(l) and (m) (as presented below) apply to appliances containing ODS refrigerants.

(i) Data Items

- Records related to determining the full charge of an appliance, including: the identification of the owner or operator of the appliance; the address where the appliance is located; the full charge of the appliance and the method for how the full charge was determined; if using an established range for determining full charge, records must include the range for the full charge of the appliance, its midpoint, and how the range was determined; and any revisions of the full charge, how they were determined, and the dates such revisions occurred.
- Service invoices with information on the identity and location of the appliance, the date and type of service performed, the name of the person performing the service, the quantity and type of refrigerant added and the full charge of the system.
- Records indicating the leak rate of the appliance, generated every time refrigerant is added to the appliance.
- For appliances that have been found to be above the threshold leak rate, records of:
 - ◆ Quarterly or annual leak inspections (or installation of an automatic leak detection system, annual inspections and recalibrations of the system, and a record of each date the system detected a leak and the location of the leak); and
 - ◆ Verification tests on repairs.
- Requests for extensions to the 30-day repair timeline or the one-year retrofit/retire timeline (as applicable). Submissions include the following information:
 - ◆ Date of notification to EPA;
 - ◆ Identification of the appliance;

- ◆ Name of the owner or operator;
- ◆ Leak rate;
- ◆ Method used to determine the leak rate and full charge;
- ◆ Date a leak rate above the applicable allowable rate was discovered;
- ◆ Location of leaks(s) to the extent determined to date;
- ◆ Any repair work that has been finished thus far, including the date that work was finished;
- ◆ Plan to finish the retrofit or retirement of the system (as applicable);
- ◆ Reasons why more than one year is necessary to retrofit or retire the system (as applicable); and
- ◆ Estimate of when retrofit or retirement work will be finished (as applicable).
- Plans to retire/replace or retrofit appliances (as applicable). Plans must include:
 - ◆ Identification and location of the appliance;
 - ◆ Type and full charge of the refrigerant used in the appliance;
 - ◆ Type and full charge of the refrigerant to which the appliance will be converted, if retrofitted;
 - ◆ Itemized procedure for converting the appliance to a different refrigerant, including changes required for compatibility with the new substitute, if retrofitted;
 - ◆ Plan for the disposition of recovered refrigerant;
 - ◆ Plan for the disposition of the appliance, if retired; and
 - ◆ One-year schedule for completion of the appliance retrofit or retirement.
- Requests to cease a retrofit/retirement if all leaks are repaired.
- Records on mothballed appliances, including the date when a system that is leaking in excess of the leak rate is mothballed and the date when refrigerant is later added back into the system.
- Records on purged or destroyed refrigerant, including information on flow rate, quantity or concentration of the refrigerant in the vent stream; and periods of purge flow.

(ii) Respondent Activities

- Retain service invoices containing the information described above.
- Retain documentation from leak inspections or on leak detection systems.
- Retain documentation on verification tests for repairs when the leak rate is exceeded.
- Notify EPA when seeking an extension of time to complete repairs.
- Notify EPA when an appliance loses more than 125 percent of its total charge within a calendar year, including a description of repairs to the appliance.
- Prepare and maintain a plan to retire/replace or retrofit leaking appliances (as applicable).
- Prepare and submit to EPA requests for extensions to the 30-day repair timeline or the one-year retrofit/retire timeline (as applicable).
- Prepare and maintain a copy of requests for extensions to the 30-day repair timeline or the one-year retrofit/retire timeline.

- Prepare and submit requests to cease a retrofit/retirement if all leaks are repaired.
- Prepare and maintain records on mothballed appliances.
- Notify EPA when excluding purged refrigerants that are destroyed from annual leak rate calculations.
- Prepare and maintain records on purged or destroyed refrigerant.

8. Small Can Manufacturers

The data items for small can manufacturers are specified in 40 CFR 82.154(c)(2) and in 40 CFR Part 82, Subpart F, Appendix E.

(i) Data Item

- Log forms of results from self-sealing valve testing.

(ii) Respondent Activities

- Prepare and retain records of results from self-sealing valve tests.

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

(a) Agency Activities

EPA activities associated with the review of the reports consist of reviewing the following:

- Applications to become an independent refrigerant recovery/recycling equipment certifying organization.
- Applications to become a certified refrigerant reclaimer.
- Annual reports from reclaimers on their activities.
- Certification notices by refrigerant reclaimers that change ownership or enter the market.
- Applications to become a technician certification program.
- Records from technician certifying programs exiting the market.
- Reports submitted by approved technician certification programs.
- Extension requests from owners/operators of commercial refrigeration, comfort cooling, and industrial process refrigeration appliances containing 50 or more pounds of an ODS refrigerant.
- Reports from owners/operators of appliances containing 50 or more pounds of an ODS refrigerant that leak 125% or more of their full charge in a calendar year.
- Requests from owners/operators to cease retrofit/retirement plans of appliances containing 50 or more pounds of an ODS refrigerant.

(b) Collection Methodology and Management

Given reports submitted by reclaimers may contain CBI, EPA encourages reclaimers to report annually on activities using the ODS Program Service within EPA's Central Data Exchange (CDX). Technician certification organizations may use this feature as well, but given the reports do not include CBI, EPA encourages submission via email to 608reports@epa.gov. Both reclaimers and technician certification organizations must submit their data using EPA forms 5900-404 and 5900-407, respectively. All other entities that must report are encouraged to submit the required information in an electronic format—either to 608reports@epa.gov if the report does not contain anything claimed as CBI or via CDX if the report does contain information claimed as CBI. Small can manufacturers can use EPA's sample form 5900-405 to facilitate recordkeeping. The information submitted by each member of the regulated community will be stored at EPA headquarters for review and reference.

(c) Small Entity Flexibility

Several of the recordkeeping and reporting requirements are intended to permit entities greater flexibility in complying with the regulations.

Technicians who only work on small appliances may take an open-book, take-home test rather than a proctored test. This provision was implemented in recognition that (1) entities servicing small appliances are often small businesses, (2) many of these entities only rarely perform service on the refrigerant circuit of small appliances, and (3) the quantity of refrigerant in small appliances is less than five pounds. For similar reasons, individuals who recover refrigerant from small appliances and motor vehicle air conditioners (MVACs) when they are disposed of are not required to be certified and are not required to use certified refrigerant recovery/recycling equipment.

Final persons in the disposal process for small appliances and MVACs may elect not to recover refrigerant themselves so long as they obtain a signed statement from persons upstream in the disposal process that the refrigerant has been removed already. The signed statement permits the final disposer to delegate responsibility for refrigerant removal.

Owners of appliances that leak above a certain level may elect to retrofit or replace their appliances rather than repair them so long as they develop a retrofit or retirement plan. Owners/operators may take longer than 30 days to complete repairs or longer than one year to retrofit or replace appliances so long as they submit documentation to EPA explaining their need for additional time.

(d) Collection Schedule

The following information is required on a specific collection schedule:

- Approved equipment testing organizations must notify EPA if a previously certified model line fails to meet EPA requirements within 30 days of the failed retest or inspection.
- On a transactional basis, reclaimers must maintain records of the quantity of each refrigerant sent to them for reclamation (the combined mass of refrigerant and contaminants), the mass of each refrigerant reclaimed, and the mass of waste products. Reclaimers must report the aggregated information by refrigerant type to EPA within 30 days of the end of the calendar year.
- Programs certifying technicians, excluding federally-run programs, must publish a list of technicians they have certified after January 1, 2017. Technicians can opt out of having their names published.
- If a refrigerant reclaimer changes ownership, the new owner must certify with EPA within 30 days of the change of ownership.
- Owners/operators of appliances containing 50 or more pounds of an ODS refrigerant must prepare a retrofit or retirement plan within 30 days of:
 - ◆ Discovering a leak greater than the threshold leak rate; or
 - ◆ An appliance continues to leak, even after making good faith efforts to repair leaks.
- Owners/operators of appliances containing 50 or more pounds of an ODS refrigerant choosing to request an extension to the retrofit/retirement timeline must do so within seven months of discovering that the leak rate exceeded the applicable leak rate.
- Owners/operators of appliances containing 50 or more pounds of an ODS refrigerant who exclude purged refrigerants that are destroyed from annual leak rate calculations must submit information to EPA within 60 days of the first time the exclusion is used by the facility where the appliance is located.
- Owners/operators of appliances containing 50 or more pounds of an ODS refrigerant that leak more than 125 percent of their full charge in one calendar year must submit a report to EPA detailing repair efforts. Reports must be submitted by March 1 the year following the exceedance.

6. Estimating the Burden and Cost of the Collection

This section contains tables that provide the numerical basis for the annual burden and cost of this ICR by detailing the following:

- EPA's rationale in preparing respondent burden and cost tables.
- Estimated respondent and Agency burden (hours to complete required activities).
- Estimated respondent and Agency labor costs and capital costs associated with those activities.
- Universe of estimates.
- Calculated burden and cost totals.

The activities for which EPA estimated burden and cost correspond directly with the activities listed in Sections 4 and 5.

(a) Estimating Respondent Burden

The Agency identified 34 information collection activities that are mandated by EPA's regulations. EPA estimated the amount of time associated with each activity based on EPA's experience implementing this Program and on EPA's best professional judgment. Table 3 summarizes the estimated number of burden hours incurred by each respondent for each information collection activity. The basis for these estimates is described in detail below.

Refrigerant Recovery/Recycling Equipment Testing Organizations: Organizations that intend to test and certify refrigerant recovery/recycling equipment need to apply for approval from EPA. EPA estimates that an organization would need eight hours to complete the application process. Each refrigerant recovery/recycling equipment testing and certifying organization approved by EPA are estimated to spend 30 minutes each year on: maintaining records of refrigerant recovery/recycling equipment tested and its performance; providing notice when equipment fails recertification; and publishing a list of all certified equipment online.

Refrigerant Reclaimers: EPA estimates it will take five hours for each entity to submit a one-time application to become certified refrigerant reclaimers. Reclaimers must maintain records of analyses conducted to verify that reclaimed refrigerant meets the necessary specifications. EPA estimates that each reclaimer will spend approximately one minute per day maintaining records, for a total of 4.3 hours annually. Reclaimers must also maintain records of refrigerant sales transactions. EPA estimates that each reclaimer will spend approximately 14 minutes per recordkeeping event with a total of 50 events per year. Therefore, each reclaimer will spend 11.7 hours maintaining records annually. Finally, reclaimers must maintain records and report annually on the quantity of material sent to them for reclamation, the amount reclaimed, waste products from the reclamation process, and customer and sales records. Compiling this information, preparing it for EPA, and submitting it to EPA is estimated to take approximately 9.4 hours per year for ODS, HFC, and other non-exempt substitute refrigerants.

Refrigerant Wholesalers: EPA estimates that each refrigerant wholesaler must spend approximately two minutes each day maintaining invoices that indicate the name of the purchaser, the date of sale, the quantity, and verification that the purchaser is a certified technician (as applicable). This results in an annual burden of 8.7 hours.

Technician Certification Programs: EPA estimates that it will take five hours for new organizations to compile the necessary information to apply for the certification program approval. EPA also estimates that existing technician certification programs spend five hours annually maintaining records on technicians certified through their programs. Technician certification programs are required to publish online a list documenting who they have certified and what type of certification each individual received. Each of the testing organizations are also required to submit biannual reports summarizing the numbers of previously certified individuals, individuals taking the tests, scores of all certification tests, and the dates and locations of all tests

administered. EPA estimates that technician certification programs spend five minutes publishing online lists and one hour completing each report. EPA expects programs to publish lists and complete reports twice a year. Organizations that stop certifying technicians must transfer their records to another certifying program or EPA. Organizations that receive those records must inform EPA within 30 days. EPA assumes that each year one program will spend eight hours transferring records and reporting to EPA.

Disposal establishments: Disposal establishments spend an estimated 3.5 minutes per business day collecting and maintaining copies of signed statements verifying that refrigerant has been removed from appliances before they are accepted for disposal.

Technicians: Technicians are expected to spend one minute each year maintaining their certification cards. EPA estimates that approximately 10 percent of the estimated 300,000 technician labor force turns over each year, necessitating certification. EPA estimates that each new technician will spend one minute acquiring a certification card. Technicians servicing appliances with charge sizes of 50 or more pounds of an ODS refrigerant are required to provide records of the following: the identity and location of the appliance, the date and type of service performed, and the quantity and type of refrigerant added. EPA estimates that each technician will spend two minutes preparing each record. EPA estimates that appliances containing 50 to 500 pounds of refrigerant will be serviced annually, requiring one invoice, and that appliances with 500 or more pounds will be serviced quarterly, requiring four invoices.

Technicians conducting leak inspections or verification tests on appliances containing 50 to 500 pounds of ODS refrigerant that had been found leaking above the threshold rate must prepare and provide records to the owner/operator of that appliance. EPA estimates that each technician will spend one minute providing each record. Technicians disposing of appliances with charge sizes between 5 and 50 pounds are also required to maintain records on: the quantity and types of refrigerants recovered in each calendar month; the quantity and type of refrigerant transferred for reclamation or destruction; the company name; and date. EPA estimates that technicians spend one minute per month to maintain these records.

Owners/operators: Owners/operators of industrial process refrigeration (IPR)⁵ comfort cooling, or commercial refrigeration appliances that contain 50 pounds or more of an ODS refrigerant may apply to EPA for an extension to the leak repair and appliance retrofit/retire timeframe. EPA estimates that each request will take 30 minutes to complete. Owners/operators of IPR, comfort cooling, or commercial refrigeration appliances that contain 50 pounds or more of an ODS refrigerant may prepare and submit requests to cease a retrofit/retirement if they are able to repair all leaks. EPA estimates an average burden of 30 minutes per request. Owners/operators of IPR, comfort cooling, or commercial refrigeration appliances that contain 50 pounds or more of

⁵ Industrial process refrigeration systems are complex, customized systems used to cool process streams in industrial applications in the chemical, food processing, pharmaceutical, chemical and manufacturing industries.

an ODS refrigerant that leak 125 percent or more of the full refrigerant charge in a calendar year are required to submit a report to EPA about efforts to identify leaks and repair the appliance. EPA estimates an average burden of one hour per owner/operator with an affected piece of equipment.

EPA estimates that owners/operators of appliances will spend three minutes per year maintaining records on the full charge of an appliance. EPA estimates that owners/operators will spend one minute per servicing event maintaining records on leak rate calculations, for an average of slightly more than 6 minutes per year (0.104 hours).⁶ Owners/operators of ODS refrigerant-containing appliances with charge sizes of 50 or more pounds are also required to maintain records for each service or maintenance event. EPA estimates that maintaining these records takes 1.5 minutes per servicing event, for an average annual burden of approximately nine minutes per owner/operator.⁷ Owners/operators of ODS refrigerant-containing appliances with charge sizes of 50 or more pounds are required to maintain reports on quarterly and annual inspections and on the results of verification tests and leak inspections any time the leak rate threshold is exceeded. EPA estimates that maintaining leak inspection records requires one minute of burden, for an average annual burden of approximately three minutes per owner/operator.⁸ EPA estimates that 1.5 minutes is required to maintain reports on the results of verification tests any time the leak threshold is exceeded. Owners/operators of ODS refrigerant-containing appliances with charge sizes of 50 or more pounds planning to retire/replace or retrofit appliances spend eight hours on developing or maintaining a plan. Owners/operators of ODS refrigerant-containing appliances with charge sizes of 50 or more pounds must prepare and maintain records of mothballed appliances. EPA estimates a burden of 1.5 minutes to prepare and maintain records. EPA also estimates that owners/operators spend 1.5 minutes maintaining information on purged and destroyed refrigerant.

Small Can Manufacturers: Manufacturers of small cans of refrigerant are required to conduct tests to verify that self-sealing valves function and maintain logs of test results. EPA estimates that manufacturers will require 1.5 minutes to document each test result and that tests will occur monthly for a total of 18 minutes annually.

(b) Estimating Respondent Costs

The total cost for each respondent activity is based on the labor costs associated with each activity. None of the reporting or recordkeeping requirements are assumed to have associated

⁶ As noted above, EPA estimates that appliances containing 50 to 500 pounds of refrigerant will be serviced annually, requiring one leak rate record, and that appliances with 500 or more pounds will be serviced quarterly, requiring four leak rate records.

⁷ The number of records is based on the total number of equipment and an assumption that appliances containing 50 to 500 pounds of refrigerant will be serviced annually, requiring one invoice, and that appliances with 500 or more pounds will be serviced quarterly, requiring four invoices.

⁸ This is calculated based on the total number of appliances that have been found to be above the threshold leak rate, and thus require quarterly or annual leak inspections.

operating and maintenance (O&M) costs or capital costs.

i. Estimating Labor Costs

The labor costs used in this analysis reflect the total cost to employ an individual and include estimates of salaries and overhead costs. EPA estimated the average annual respondent hourly cost (labor plus overhead) for all affected entities. In deriving these costs, EPA identified applicable standard occupational classification for each respondent and used the 2021 median hourly rate from the Bureau of Labor Statistics.⁹ EPA then increased these numbers by 110% for overhead. Previously, EPA used only the rate for Heating, Air-Conditioning, and Refrigeration Mechanics and Installers for all recordkeeping and reporting activities associated with this ICR. EPA has revised this ICR to more accurately reflect the various types of entities conducting the activities and their associated costs. The resulting costs outlined in Table 2 are the average hourly administrative cost of labor plus overhead for private firms.

Table 2: Labor Costs for Affected Entities

Respondent	Bureau of Labor Statistics Information			Total
	Standard Occupational Classification	Occupational Title	Median Wage	
Refrigerant Recovery/Recycling Equipment Testing Organization	17-2081	Environmental Engineers	\$48.18	\$101.18
Refrigerant Reclaimers	51-8091	Chemical Plant and Systems Operators	\$33.18	\$69.68
Refrigerant Wholesalers	41-4012	Sales Representatives, Wholesale	\$34.81	\$73.10
Technician Certification Programs	25-9031	Instructional Coordinators	\$33.92	\$71.23
Disposal Establishments	49-9021	Heating, Air-Conditioning, and Refrigeration Mechanics and Installers	\$26.29	\$55.21
Technicians				
Owners/Operators	17-2111	Health and Safety Engineers	\$47.93	\$100.65
Small Can Manufacturers	43-5111	Weighers, Measurers, Checkers, and Samplers	\$19.01	\$39.92

ii. Estimating Capital Costs and Operations and Maintenance Costs

There are two types of non-labor costs – capital/start-up costs and O&M costs. One-time

⁹ Bureau of Labor Statistics, U.S. Department of Labor. May 2021 National Occupational Employment and Wage Estimates United States. Available at http://www.bls.gov/oes/current/oes_nat.htm (visited July 31, 2018).

capital/start-up costs include any produced physical good needed to provide the necessary information. Start-up capital must be purchased for the specific purpose of satisfying EPA's reporting or recordkeeping requirements. Capital goods include computers, machinery, or equipment. Start-up capital costs are incurred at the beginning of an information collection period and are incurred only once. In addition to the acquisition of start-up capital, one-time activities associated with the production of capital have also been evaluated. EPA has considered capital/start-up costs and O&M costs in determining that there are no non-labor related costs associated with this ICR.

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

The respondent universe as well as the frequency of reporting are identified in 40 CFR, Part 82, Subpart F, and includes refrigerant recovery/recycling equipment testing organizations; averages for the number of service establishments, disposers, and refrigerant reclaimers that enter the market or change ownership; refrigerant wholesalers; technician certification programs; technicians acquiring certification and maintaining certification cards; technicians servicing refrigeration and air-conditioning appliances; owners of refrigeration and air-conditioning appliances; owners of industrial process refrigeration appliances; and small can manufacturers. EPA used past experience, previously reported data, modeling, and estimates from the affected community to determine the number of respondents (or the respondent universe). The estimates are based upon EPA's experience in implementing the Program since 1993 and analysis conducted in the Technical Support Document that accompanied the 2016 Rule.¹⁰ A listing of these entities follows:

- **Refrigerant/Recycling Equipment Testing Organizations:** Testing organizations for refrigerant recovery/recycling equipment have remained at two organizations since inception of the program in 1993. Based on past experience, EPA does not anticipate that additional entities will apply to become approved refrigerant recovery/recycling equipment testing organizations.
- **Refrigerant Reclaimers:** EPA currently has 56 certified refrigerant¹¹ reclaimers who must submit annual activity reports. Based on EPA's experience, EPA estimates two reclaimers per year will submit one-time applications to EPA to be certified.
- **Refrigerant Wholesalers:** EPA assumes that the number of wholesalers is 10,000. This assumption is based on data on the number of wholesaler locations from Heating, Air-conditioning & Refrigeration Distributors International (HARDI) and is consistent with assumptions used in the ICR for *Recordkeeping and Reporting of the Hydrofluorocarbon Allowance Allocation and Trading Program*.

¹⁰ See *Technical Support Document: Analysis of the Economic Impact and Benefits of Final Revisions to the National Recycling and Emission Reduction Program*. September 2, 2016. Available at: <https://www.regulations.gov/document?D=EPA-HQ-OAR-2015-0453-0225>.

¹¹ See, <https://www.epa.gov/section608/epa-certified-refrigerant-reclaimers>.

- **Technician Certifying Programs:** EPA currently has 74¹² certified technician certifying programs. Based on EPA's experience, EPA estimates three new organizations per year will submit materials to EPA requesting that they be authorized to test and certify technicians. EPA assumes that, on average, one technician certifying program will exit the market and need to transfer records to EPA or another certifying program.
- **Technicians:** EPA assumes that the number of technicians entering the workplace has remained constant with those that who have left the workforce. This ICR assumes that the number of technicians has remained constant at 300,000. EPA assumes that 10 percent of the technician labor force turns over each year (i.e., 30,000 technicians), necessitating certification.
- **Disposal Establishments:** EPA assumes that the number of disposal establishments (7,500) has not changed since the previous ICR.
- **Owners/Operators:**¹³
 - ◆ Based on actual submissions to EPA, the Agency estimates that four owners/operators of comfort cooling, commercial refrigeration, and industrial process refrigeration appliances with charge sizes of 50 or more pounds of ODS refrigerant will choose to exclude the amount of purged and destroyed refrigerant from their leak rate calculations.
 - ◆ EPA allows owners/operators of industrial process refrigeration, comfort cooling, and commercial refrigeration appliances with a charge size of 50 or more pounds of ODS refrigerant to submit a written request for an extension to leak repair requirements. The number of extensions is estimated based on the Agency's experience implementing this provision and the number of submissions historically received by EPA annually. EPA estimates that 25 owners/operators of ODS appliances will prepare and submit request for extensions each year.
 - ◆ Five owners/operators of appliances with a charge size of 50 or more pounds of ODS refrigerant are expected to prepare and submit requests for extensions to the one year retrofit/retire timeline. This estimate is based on the Agency's experience implementing this provision and the number of submissions historically received by EPA annually.
 - ◆ EPA estimates that 2,745 owners/operators will develop and maintain the required appliance retrofit/retirement report at their place of business. EPA assumes that fewer retrofits/ retirements will now occur due to the availability of extensions.
 - ◆ EPA estimates that five entities that develop retrofit/retire plans will submit a request to cease retrofit/retirement. This estimate is based on the Agency's experience implementing this provision and the number of requests historically received by EPA annually.

¹² See, <https://www.epa.gov/section608/section-608-technician-certification-programs>.

¹³ All of the following assumptions about the number of owners/operators of comfort cooling, commercial refrigeration, and industrial process refrigeration appliances were developed in the Technical Support Document that accompanies the 2016 Rule.

- ◆ Owners/operators must prepare and maintain records of mothballed appliances. EPA estimates that five percent of owners/operators, or 137 entities, will need to maintain these records.
- ◆ EPA estimates that 255,083 owners/operators of appliances with charge sizes of 50 or more pounds of ODS refrigerant would need to maintain annual or quarterly service invoices. The number of owners/operators is estimated based on the total number of appliances and the average number of appliances per model facility in the Technical Support Document associated with the 2016 Rule.
- ◆ EPA estimates that there are 166,175 events that would exceed the leak rate threshold in IPR, comfort cooling, and commercial refrigeration appliances containing an ODS refrigerant. For the purposes of this analysis, EPA assumes that the number of leak events is equivalent to the number of owners/operators that would need to keep records on the results of the verification tests when those thresholds are exceeded.
- ◆ Based on reports submitted to EPA during 2019 and 2020, EPA estimates that 125 entities will have events where IPR, comfort cooling, and commercial refrigeration appliances will leak 125 percent or more of the full charge in a calendar year.
- **Small Can Manufacturers:** EPA estimates there are 12 manufacturers of small cans of refrigerant that need to comply with the self-sealing valve requirements.

Almost all of the entities that may be subject to these regulatory actions are small businesses. Additional information on small business impacts can be found in the 2016 Technical Support Document.¹⁴

¹⁴ See Technical Support Document: Analysis of the Economic Impact and Benefits of Final Revisions to the National Recycling and Emission Reduction Program. September 2, 2016. Available at: <https://www.regulations.gov/document?D=EPA-HQ-OAR-2015-0453-0225>.

Table 3: Hours and Costs per Respondent Activity

Respondent Type	Activity	Responses per Respondent per Year	Hours per Response	Total Hours per Respondent per Year	Costs per Respondent per Year
Refrigerant Recovery/ Recycling Equipment Testing Organizations	Apply for approval	1	8.00	8.0	\$809.42
	Provide notice when equipment fails recertification	1	0.50	0.5	\$50.59
	Publish online list of all certified equipment	1	0.50	0.5	\$50.59
	Maintain records of equipment tested and its performance	1	0.50	0.5	\$50.59
Refrigerant Reclaimers	Submit annual activity report	1	9.37	9.4	\$652.82
	Provide certification when changing ownership or entering the market	1	5.00	5.0	\$348.39
	Maintain records	50	0.23	11.7	\$812.91
	Maintain records that analysis conducted to verify that reclaimed refrigerant meets the necessary specifications	260	0.02	4.3	\$301.94
Refrigerant Wholesalers	Maintain records for refrigerant sales, including technician certification cards from purchasers employing at least one certified technician	260	0.03	8.7	\$633.54
Technician Certifying Programs	Apply for approval	1	5.00	5.0	\$356.16
	Maintain list/database of technicians certified	2	0.08	0.2	\$11.87
	Submit biannual report	2	1.00	2.0	\$142.46
	Transfer records when no longer operational	1	8.00	8.0	\$569.86
	Recordkeeping by existing Technician Certification Programs	1	5.00	5.0	\$356.16
Disposal Establishments	Maintain copies of signed statements of previous refrigerant recovery by disposal establishments	260	0.06	15.2	\$837.34
Technicians	Acquire certification cards	1	0.02	0.0	\$0.92
	Maintain certification cards	1	0.02	0.0	\$0.92
	Provide invoices for serviced ODS appliances with charge sizes 50 to	2.2	0.03	0.1	\$4.06

Respondent Type	Activity	Responses per Respondent per Year	Hours per Response	Total Hours per Respondent per Year	Costs per Respondent per Year
	500 lbs.				
	Provide invoices for serviced ODS appliances with charge sizes >500 lbs.	2.0	0.03	0.1	\$3.63
	Provide leak inspection records to owner/operator	0.55	0.02	0.0	\$0.51
	Maintain disposal records for appliances with charge sizes of 5 - 50 lbs.	12	0.02	0.2	\$11.04
Owners/ Operators of Appliances with Charge Sizes of 50 or More Pounds of ODS Refrigerant	Prepare and submit requests for extensions to 30-day repair timeline	1	0.50	0.5	\$50.33
	Prepare & submit requests for extensions to 1 yr retrofit/retire timeline	1	0.50	0.5	\$50.33
	Prepare and submit request to cease a retrofit/retirement if all leaks are repaired	1	0.50	0.5	\$50.33
	Prepare and submit report on efforts to repair chronically leaking appliances	1	1.00	1.0	\$100.65
	Maintain records of the full charge of an appliance	1	0.05	0.1	\$5.03
	Maintain records of the leak rate calculation	6.25	0.02	0.1	\$10.49
	Maintain purchase and service records.	6.25	0.03	0.2	\$15.74
	Maintain leak inspection records.	2.73	0.02	0.0	\$4.59
	Maintain reports on the results of verification tests	1	0.03	0.0	\$2.52
	Develop/maintain plan to retire/replace or retrofit equipment, as applicable	1	8.00	8.0	\$805.22
	Maintain records on mothballed equipment	1	0.03	0.0	\$2.52
	Maintain information on purged/destroyed refrigerant	1	0.03	0.0	\$2.52
Small Can Manufacturers	Maintain records of self-sealing valve test data and log forms for 3 years	12	0.03	0.3	\$11.98

Table 4: Respondent Burden and Cost Table

Respondent Type	Activity	Respondents per Activity Per Year	Total Hours per Year	Total Costs per Year
Refrigerant Recovery/ Recycling Equipment Testing Organizations	Equipment testing organization applying for approval	0	0	\$0
	Maintain records of refrigerant recovery/recycling equipment tested and its performance	2	1	\$101
	Providing notice when equipment fails recertification	2	1.00	\$101
	Publish online a list of all certified equipment	2	1.000	\$101
Refrigerant Reclaimers	Certification by refrigerant reclaimers that change ownership or enter the market	56	525	\$36,558
	Maintain records of analysis conducted to verify that reclaimed refrigerant meets the necessary specifications	2	10	\$697
	Reclaimer recordkeeping	56	56	\$45,523
	Annual activity report	56	243	\$16,909
Refrigerant Wholesalers	Recordkeeping for refrigerant sales, including maintenance of technician certification cards from purchasers employing at least one certified technician	10,000	86,667	\$6,335,420
Technician Certifying Programs	Apply for approval	3	15	\$1,068
	Recordkeeping by existing technician certification programs	74	12	\$879
	Maintain list of technicians certified	74	148	\$10,542
	Biannual reporting by technician certification programs	1	8	\$570
	Transfer of records when no longer operational	74	370	\$26,356
Disposal Establishments	Maintain copies of signed statements of previous refrigerant recovery by disposal establishments	7,500	113,750	\$6,280,024
Technicians	Technicians acquire certification cards	30,000	500	\$27,605
	Technicians maintain certification cards	300,000	5,000	\$276,045
	Provide invoices for serviced ODS appliances with charge sizes 50 to 500 lbs.	300,000	22,079	\$1,218,954

Respondent Type	Activity	Respondents per Activity Per Year	Total Hours per Year	Total Costs per Year
	Provide invoices for serviced ODS appliances with charge sizes >500 lbs.	300,000	19,700	\$1,087,617
	Provide leak inspection and verification test records	300,000	2,770	\$152,906
	Maintain disposal records for appliances with charge sizes of 5 - 50 lbs.	300,000	60,000	\$3,312,540
Owners/ Operators of Appliances with Charge Sizes of 50 or More Pounds of ODS Refrigerant	Prepare and submit requests for extensions to 30-day repair timeline	25	13	\$1,258
	Prepare and submit requests for extensions to 1-year retrofit/retire timeline	5	3	\$252
	Prepare and submit requests to cease a retrofit/retirement if all leaks are repaired	5	3	\$252
	Prepare and submit report on efforts to repair chronically leaking appliances	125	125	\$12,582
	Maintain records of the full charge of an appliance	255,083	12,754	\$1,283,743
	Maintain records of the leak rate calculation	255,083	26,588	\$2,676,154
	Maintain purchase and service records	255,083	39,882	\$5,236,883
	Maintain leak inspection records	166,175	7,574	\$762,319
	Maintain reports on the results of verification tests any time the leak rate threshold is exceeded	166,175	4,154	\$418,150
	Develop/maintain plan to retire/replace or retrofit appliances, as applicable	2,745	21,960.0	\$2,210,340
	Maintain records on mothballed equipment	137	3	\$345
	Maintain information on purged/destroyed refrigerant	4	0.1	\$9
Small Can Manufacturers	Maintain records of self-sealing valve test data and log forms for 3 years	12	4	\$144

(d) Estimating Agency Burden and Cost

The hourly rate for EPA staff at the GS-13 Step 1 level is \$38.92 per hour. This hourly basic rate is from the 2022 GS salary schedule listed in the Federal Wage Page of the Office of Personnel Management website <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/>. EPA then multiplied the hourly rate by the standard government benefits and overhead multiplication factor of 1.6. The resulting rate that was used in estimating annual Agency burden and cost is \$62.27 ($\38.92×1.6).

EPA has used past experience, reporting data, and estimates from the affected community in determining the number of responses that the Agency would review. The following paragraphs describe the amount and degree of burden.

- **Refrigerant Reclaimers:** 56 certified refrigerant reclaimers must submit annual activity reports. EPA will spend one hour reviewing each of the annual reports for a total of 56 hours per year.

Based on EPA's experience, it is assumed that two new refrigerant reclaimers per year will submit one-time applications to EPA to be certified. EPA spends one hour reviewing and approving each certification for a total of four hours per year.

Technician Certifying Programs: 74 certified technician certifying programs must submit biannual activity reports to EPA. EPA will spend one hour reviewing each biannual activity report, for a total of 148 hours per year. Based on EPA's experience, the Agency expects to certify three new technician certification organizations per year. EPA expects to spend two hours reviewing and approving each application, for a total of six hours per year. EPA assumes one technician certifying program will exit the market and need to transfer records to EPA or another entity. EPA assumes one hour for processing these records.

Owners/Operators: EPA estimates that it takes 15 minutes to review and make a determination on each of the anticipated 25 requests from owner/operators of industrial process refrigeration, comfort cooling, and commercial refrigeration appliances for an extension to the 30-day repair requirement for mandatory leak repair, for a total of 6 hours per year. EPA estimates one hour to review and make a determination on anticipated 5 requests from the owner/operator of industrial process refrigeration, comfort cooling, and commercial refrigeration appliances for an extension to the one-year retrofit requirement under the leak repair requirements, for a total of 5 hours a year.

EPA estimates that it takes 30 minutes to review each of the anticipated 125 reports on IPR, comfort cooling, and commercial refrigeration appliances that leak 125 percent or more of the full charge in a calendar year, for a total of 63 hours per year. EPA estimates that it will take five minutes to review each of the anticipated 5 requests to cease retrofit/retirement.

Table 5: Annual Agency Burden and Cost

Activity	Number of Respondents	Number of Responses per Respondent	Burden Hours per Response	Total Agency Hours	Total Agency Labor Costs
Reclaimer annual activity report	56	1	1	56	\$3,487
Certification by reclaimers that change ownership or enter the market	2	1	1	2	\$125
Biannual reporting by existing technician certification programs	74	2	1	148	\$9,216
Technician certification programs applying for approval	3	1	2	6	\$374
Process records from technician certifying programs exiting the market	1	1	1.0	1	\$62
Owners/operators of appliances with 50 or more pounds of ODS refrigerant prepare & submit requests for extensions to the 30-day repair timeline	25	1	0.25	6	\$389
Owners/operators of appliances with 50 or more pounds of ODS refrigerant prepare & submit requests for extensions to 1 year retrofit/retire timeline	5	1	1	5	\$311
Owners/operators of appliances with 50 or more pounds of ODS refrigerant prepare & submit requests to cease a retrofit/retirement if all leaks are repaired	5	1	0.08	0.42	\$26
Owners/operators of appliances with 50 or more pounds of ODS refrigerant that leak 125 percent or more of the full charge in a calendar year to submit report on leak and intended repair	125	1	0.5	63	\$3,892

(e) Bottom Line Burden Hours and Cost Tables

The bottom line burden hours and cost tables for respondents and the Agency are summarized below for all activities in Table 6 and Table 7.

i) Respondent Tally

Table 6: Total Annual Respondent Burden

Total Respondents	Total Responses	Hour Burden	Labor Costs
572,727	13,698,513	425,514	\$31,432,946

ii) The Agency Tally

Table 7: Total Annual Agency Burden

Total Hours	Labor Costs
287	\$17,882

(f) Reasons for Change in Burden

There is a decrease of 8,845 hours in the total estimated respondent burden compared with the ICR currently approved by OMB. This decrease is due to adjusted respondent estimates for appliance leak repair and retrofit or retirement plan extension requests based on recently available industry data and reported activity.

(g) Burden Statement

The public reporting burden for this collection of information is estimated to average 0.03 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it

displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.