

# Subsection H Leak Repair, Inspection, ALD,

Leak repair 15+ pound threshold (plus school bus AC); ALD for 1500+ po

## Assumptions

	Median Wage (2021)
Overhead	
Ref/AC Technicians	\$26.29
Owners/Operators	\$47.93
Manager	\$49.25
Technician (Reclaimer)	\$46.55
Lawyer	\$61.54
Office Clerk, General Administration	\$17.81
Marketing Manager	\$64.92
Graphic Designer	\$24.38

2025

Affected Equipment (above LR threshol	Year 1
15-50 pounds (including school buses a	201,123
50+ pounds	143,263
50+ pound appliances with quarterly re	12,343
CR and IPR Appliances above LR with ch	6,180
CR and IPR Appliances above LR with ch	6,180
Assumed equipment per facility (from	2.8

New Equipment Installations	Year 1
15-50 pounds (including school buses a	51,283
50+ pounds	112,829
CR and IPR Appliances with charge size	24,658
CR and IPR Appliances with charge size	24,658

Existing Equipment Installations	Year 1
15-50 pounds (including school buses a	764,439
50+ pounds	637,555

Requirement Type	Respondent type
Reporting	Owners/operators

Leak

Leak	Reporting	Owners/operators
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Leak	Recordkeeping	Owners/operators
Leak	Recordkeeping	Owners/operators

Recordkeeping	Owners/operators
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Leak	Recordkeeping	Owners/operators
Leak	Recordkeeping	Owners/operators
Leak	Third-party Reporting	Tehnicians
Leak	Third-party Reporting	Tehnicians
Leak	Third-party Reporting	Tehnicians
Leak	Third-party Reporting	Tehnicians
Leak	Third-party Reporting	Technicians
Leak	Third-party Reporting	Technicians
Leak	Third-party Reporting	Technicians
Leak	Third-party Reporting	Technicians
Fire	Reporting	Fire Suppression System OEMs/Service/Recyclers
Fire	Recordkeeping	Fire Suppression System OEMs/Service/Recyclers
Recla	Third-party Reporting	HFC Reclaimers

Recordkeeping	HFC Reclaimers
Reporting	Fire Suppression Agent Recyclers
Reporting	Fire Suppression Agent Recyclers
Reporting	HFC Producers
Reporting	HFC Producers
Reporting	HFC Importers
Reporting	HFC Importers
Reporting	HFC Fillers and Packagers
Reporting	HFC Fillers and Packagers
Reporting	HFC Suppliers
Reporting	HFC Suppliers
Reporting	HFC Reclaimers
Reporting	HFC Reclaimers

Recla

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Requirement Type	Respondent type
Contingency Planning	Reclaimer
	Reclaimer
	Reclaimer

	Reclaimer
	Reclaimer
	Reclaimer
Emergency Procedures	Reclaimer
	Reclaimer
	Reclaimer
Personnel Training	Reclaimer
	Reclaimer
Emergency Procedures	Reclaimer
	Reclaimer
	Reclaimer
	Reclaimer
<i>No Speculative Accumulation 40 CFR 266.602(a)(2) and (b)(3)</i>	Reclaimer
	Reclaimer

# and Reclamation Requirements

\*\*\* E.O.

und CR and IPR equipment (50/50 direct and indirect ALD)

Total (+ Overhead)	
110%	
\$55.21	Mean hourly earnings for heating, air-conditio
\$100.65	Mean hourly earnings for health and safety en
\$103.43	Median hourly earnings for management occu
\$97.76	Median hourly earnings for environmental eng
\$129.23	Median hourly earnings for lawyers (23-1011)
\$37.40	Median hourly earnings for office clerks, gener
\$178.87	Median hourly earnings for marketing manage
\$67.17	Median hourly earnings for graphic designers (

	2026	2027
<b>Year 2</b>	<b>Year 3</b>	
205,737	210,324	
150,265	157,184	
12,774	13,189	
6,225	6,246	
6,225	6,246	

	Year 2	Year 3
52,280	53,140	
113,536	114,249	
24,830	24,904	
24,830	24,904	

	Year 2	Year 3
784,495	804,633	
668,194	698,323	

Activity	Reg Text Citation	Affected Equipment
Prepare and submit requests for	24 106(m)(1)	IPR, CC, and CR 15-50 pounds

extensions to 30-day repair timeline	84.106(m)(1)	IPR, CC, and CR >50 pounds
Prepare and submit requests for extensions to 1 yr retrofit/retire timeline	84.106(m)(3)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds
Prepare and submit request to cease a retrofit if all leaks are repaired	84.106(m)(2)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds
Prepare and submit a report to EPA if appliance leaks 125% or more of the full charge in a 365 day period to describe efforts to identify leaks and repair the appliance	84.106(m)(4)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds
Prepare and submit a report to EPA if excluding purged refrigerants that are destroyed from annual leak rate calculations for the first time	84.106(m)(5)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds
Maintain purchase and service records. For each refrigerant addition, equipment owner has to have records of: (i) The identity and location of the appliance; (ii) The date of the installation, service, repair, or disposal performed; (iii) The part(s) of the appliance being serviced, repaired, or disposed; (iv) The type of service, repair, or disposal performed for each part; (v) The name of the person performing the installation, service, repair, or disposal; (vi) The amount and type of refrigerant added to, or in the case of disposal removed from, the appliance; (vii) The full charge of the appliance; and (viii) The leak rate and the method used to determine the leak rate (not applicable when disposing of the appliance, following a retrofit, installing a new appliance, or if the refrigerant addition qualifies as a seasonal variance).	84.106(l)(2); 84.106(l)(11)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds



<p>Maintain equipment installation records:</p> <ul style="list-style-type: none"> <li>(i) The identification of the owner or operator of the appliance;</li> <li>(ii) The address where the appliance is located;</li> <li>(iii) The full charge of the appliance and the method for how the full charge was determined;</li> <li>(iv) If using method 4 (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;</li> <li>(v) Any revisions of the full charge, how they were determined, and the dates such revisions occurred; and</li> <li>(vi) The date of installation.</li> </ul>	84.106(l)(1)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds
Maintain retrofit and/or retirement plans	84.106(l)(7)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds
Maintain records documenting when the system was mothballed and when it was brought back on-line (i.e., when refrigerant was added back into the appliance or isolated component of the appliance)	84.106(l)(9)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds
Maintain records of purged and destroyed refrigerant if excluding such refrigerant from the leak rate	84.106(l)(10)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds
Maintain reports on the results of verification tests any time leak rate threshold is exceeded	84.106(l)(6)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds
Maintain quarterly leak inspection records	84.106(l)(4)	IPR and CR >500 pounds
Maintain annual leak inspection records	84.106(l)(4)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds
Maintain copies of any reports submitted to EPA under the proposed reporting	84.106(l)	IPR, CC, and CR 15-50 pounds

to EPA under the proposed reporting requirements in this action	(8);84.106(l)(12)	IPR, CC, and CR >50 pounds
monitoring system identified a leak, and the location of the leak. Records must be maintained each time an ALD system detects a leak, whether that be based on the applicable ppm threshold for a direct	84.106(l)(5); 84.108(j)	IPR and CR >1500 pounds with indirect ALD
Persons servicing HFC appliances provide leak inspection records to owners/operators	84.106(l)(4)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds
Persons servicing HFC appliances provide reports on the results of verification tests any time leak rate threshold is exceeded to owners/operators	84.106(l)(6)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds
appliance; (ii) The date of the installation, service, repair, or disposal performed; (iii) The part(s) of the appliance being serviced, repaired, or disposed; (iv) The type of service, repair, or disposal performed for each part; (v) The name of the person performing the installation, service, repair, or disposal; (vi) The amount and type of refrigerant added to, or in the case of disposal removed from, the appliance; (vii) The full charge of the appliance; and (viii) The leak rate and the method used to	84.106(l)(3)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds
mass of regulated substance and contaminants) by regulated substance sold, recovered, recycled, and virgin for the purpose of installation of new equipment and servicing of fire suppression equipment (ii) The total mass of each regulated substance sold, recovered, recycled, and virgin and; (iii) The total mass of waste products sent for disposal along with information about	84.110(g)	HFC Fire Suppression Equipment
Maintain records on: - Data submitted to EPA annually - Fire suppression technician training provided to personnel - HFCs recovered from fire suppression equipment before it's sent for disposal (i.e., recovering themselves or leaving HFC in and sending to disposal facility)	84.110(g)(1)-(3)	HFC Fire Suppression Equipment
One-time label redesign	84.112(c)	Cylinders

Maintain records on: - the name, address, contact person, email address, and phone number of the certified reclaimer, - the date the container was filled with reclaimed HFCs, the amount and name of the HFC(s) in the container, - percent of virgin HFCs in the container, - certification that the contents do not exceed 15 percent virgin HFCs, - the serial number of the container, and - identification of the batch of reclaimed HFCs used to fill the container	84.112(d)(3)	Cylinders
Register with tracking ID system	84.118(d)(5)	Cylinders
Enter data into tracking ID system	84.118(d)(3)	Cylinders
Register with tracking ID system	84.118(d)(5)	Cylinders
Enter data into tracking ID system	84.118(d)(4)	Cylinders
Register with tracking ID system	84.118(d)(5)	Cylinders
Enter data into tracking ID system	84.118(d)(1)	Cylinders
Register with tracking ID system	84.118(d)(5)	Cylinders
Enter data into tracking ID system	84.118(d)(4)	Cylinders
Register with tracking ID system	84.118(d)(6)	Cylinders
Enter data into tracking ID system	84.118(c)(4)	Cylinders
Register with tracking ID system	84.118(d)(5)	Cylinders
Enter data into tracking ID system	84.118(d)(2)	Cylinders
<b>ANNUAL TOTAL</b>		
<b>3 YEAR TOTAL</b>		
<b>ANNUAL AVERAGE</b>		
<b>Unique Respondents</b>		

Activity	AVOIDED Hours per Activity per Respondent	
	Legal	Manager
	\$129.23	\$103.43
Collect data required in contingency plan	0.00	0.00
Document whether authorities decline arrangement	0.00	0.00
Write contingency plan	0.00	0.00

Maintain contingency plan	0.00	0.00
Submit contingency plan to relevant emergency centers	0.00	0.00
Amend contingency plan when appropriate	0.00	0.00
Collect information	0.00	0.00
Emergency reporting	(1.28)	0.00
Notifying/coordination with authorities	0.00	(0.10)
Collect job-related data	0.00	0.00
Maintain information at facility	0.00	0.00
Observe scene of hazardous waste discharge	0.00	0.00
Report by phone requested data items to NRC	0.00	0.00
Document that local officials decline to enter into arrangements for coordinating response	0.00	0.00
Post emergency information by phone	0.00	0.00
Label containers in accumulation area with start date	0.00	0.00
At least 75% by weight or volume of material being recycled is transferred to a different	0.00	0.00

ning, and refrigeration mechanics and installers (49-9021) from the Bureau of Labor Statistics (<https://www.bls.gov/oes/2021/may/oes499021.htm>).  
 Engineers (17-2111) from the Bureau of Labor Statistics (<https://www.bls.gov/oes/2021/may/oes172111.htm>).  
 Technicians (11-0000) from the Bureau of Labor Statistics (<https://www.bls.gov/oes/2021/may/oes110000.htm>).  
 Engineers (17-2081) from the Bureau of Labor Statistics (<https://www.bls.gov/oes/2021/may/oes172081.htm>).  
 Technicians (11-2310) from the Bureau of Labor Statistics (<https://www.bls.gov/oes/2021/may/oes231011.htm>).  
 Technicians (43-9061) from the Bureau of Labor Statistics (<https://www.bls.gov/oes/2021/may/oes439061.htm>).  
 Technicians (11-2021) from the Bureau of Labor Statistics (<https://www.bls.gov/oes/2021/may/oes112021.htm>).  
 Technicians (27-1024) from the Bureau of Labor Statistics (<https://www.bls.gov/oes/2021/may/oes271024.htm>).

245,340 Total ODS equipment, VM, 2025

1,348,234 Total HFC equipment, VM, 2025

15%	Proportion of ODS equipment, VM, 2025
85%	Proportion of HFC equipment, VM, 2025
15%	15-50 (plus school buses above 15 pounds) Affected Equipment relative to total HFC equipment, VM, 2025
11%	50+ Affected Equipment relative to total HFC equipment, VM, 2025

Year 1	Year 2	Year 3	Number of Responses per Respondent	Burden Hours (Time) per Response
Number of Respondents	Number of Respondents	Number of Respondents		
137	141	144	1.0	0.50

137	144	151	1.0	0.50
27	28	29	1.0	0.50
27	29	30	1.0	0.50
101	103	105	1.0	0.5
72	75	79	1.0	0.5
213	218	223	1.0	1.00
152	159	167	1.0	1.00
4	4	4	1.0	0.03
4	4	4	1.0	0.03
268,969	275,140	281,274	2.8	0.025
224,325	235,288	246,121	2.8	0.025

51,283	52,460	53,629	1.0	0.025
112,829	118,343	123,792	1.0	0.025
2,011	2,057	2,103	1.0	8.00
1,433	1,503	1,572	1.0	8.00
40	41	42	1.0	0.025
29	30	31	1.0	0.025
4	4	4	1.0	0.025
4	4	4	1.0	0.025
201,123	205,737	210,324	1.0	0.03
143,263	150,265	157,184	1.0	0.03
49,373	51,786	54,170	4.0	0.02
201,123	205,737	210,324	1.0	0.02
130,920	137,319	143,641	1.0	0.02
482	494	505	1.0	0.02

392	411	430	1.0	0.02
24,658	25,863	27,054	1.0	0.02
300,000	306,882	313,724	0.67	0.017
300,000	314,662	329,149	0.48	0.017
300,000	306,882	313,724	0.67	0.017
300,000	314,662	329,149	0.48	0.017
300,000	306,882	313,724	2.55	0.033
300,000	314,662	329,149	2.13	0.033
20	20	20	1	9.40
20	20	20	1	40
31	0	0	1	9.00



0	31	31	1	40.00
1	3	1	1	0.50
1	4	4	105882	0.006
10	1	1	1	0.50
10	10	10	26	2.000
75	1	1	1	0.50
75	75	75	26	2.000
13	37	1	1	0.50
13	50	50	52941	0.006
2,500	7,500	1	1	0.500
2,500	10,000	10,000	1013	0.003
8	23	1	1	0.50
8	31	31	105882	0.006
<b>3,218,421</b>	<b>3,345,826</b>	<b>3,452,004</b>	<b>265,822</b>	<b>127</b>
	<b>10,016,251</b>			
	<b>3,338,750</b>			
<b>795,920</b>	<b>824,996</b>	<b>851,304</b>		

Respondent and Loaded Hourly Wages		Burden Hours/Activity	AVOIDED Labor Costs/Activity	AVOIDED Capital Costs
Technical	Clerical			
\$97.76	\$37.40			
(3.35)	(1.65)	(5.00)	\$ (389.19)	\$ -
0.00	(0.50)	(0.50)	\$ (18.70)	\$ -
(7.50)	(2.50)	(10.00)	\$ (826.67)	\$ -

0.00	(1.00)	(1.00)	\$ (37.40)	\$ -
0.00	(0.50)	(0.50)	\$ (18.70)	\$ -
(5.00)	0.00	(5.00)	\$ (488.78)	\$ -
(0.22)	(1.50)	(1.72)	\$ (77.61)	\$ -
(0.90)	0.00	(2.18)	\$ (253.40)	\$ -
(0.90)	0.00	(1.00)	\$ (98.32)	\$ -
(0.50)	0.00	(0.50)	\$ (48.88)	\$ -
0.00	(0.10)	(0.10)	\$ (3.74)	\$ -
(0.50)	0.00	(0.50)	\$ (48.88)	\$ -
(0.50)	0.00	(0.50)	\$ (48.88)	\$ -
(0.10)	0.00	(0.10)	\$ (9.78)	\$ -
0.00	(0.10)	(0.10)	\$ (3.74)	\$ -
(0.25)	0.00	(0.25)	\$ (24.44)	\$ -
(0.25)	0.00	(0.25)	\$ (24.44)	\$ -


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IC equipment, VM, 2025

Labor Cost per Response	Year 1	Year 1	Year 1	Year 2
	Annual Burden Hours	Annual Labor Costs	Number of Annual Responses	Annual Burden Hours
\$ 50.33	68.7	\$ 6,914.07	137	70.3

\$ 50.33	68.7	\$ 6,914.07	137	72.0
\$ 50.33	13.74	\$ 1,382.81	27	14.05
\$ 50.33	13.7	\$ 1,382.81	27	14.4
\$ 50.33	50.3	\$ 5,061	101	51.4
\$ 50.33	35.8	\$ 3,605	72	37.6
\$ 100.65	213	\$ 21,471.37	213	218
\$ 100.65	152	\$ 15,294.42	152	159
\$ 2.52	0.094	\$ 9.43	4	0.096
\$ 2.52	0.094	\$ 9.43	4	0.098
\$2.516	19,111	\$ 1,923,576.20	764,439	19,549
\$2.516	15,939	\$ 1,604,294.96	637,555	16,718

\$2.516	1,282	\$ 129,045.53	51,283	1,311
\$2.516	2,821	\$ 283,913.97	112,829	2,959
\$ 805.22	16,090	\$ 1,619,492.42	2,011	16,459
\$ 805.22	11,461	\$ 1,153,591.97	1,433	12,021
\$ 2.52	1.01	\$ 101.22	40	1.03
\$ 2.52	0.72	\$ 72.10	29	0.75
\$ 2.52	0.09	\$ 9	4	0.10
\$ 2.52	0.09	\$ 9	4	0.10
\$ 2.52	5,028	\$ 506,091.38	201,123	5,143
\$ 2.52	3,582	\$ 360,497.49	143,263	3,757
\$1.68	3,292	\$ 331,300	197,490	3,452
\$1.68	3,352	\$ 337,394.26	201,123	3,429
\$1.68	2,182	\$ 219,625.43	130,920	2,289
\$1.68	8	\$ 809.40	482	8

\$1.68	7	\$ 657.92	392	7
\$1.68	411	\$ 41,364.51	24,658	431
\$ 0.92	3,352	\$ 185,063.53	201,123	3,429
\$ 0.92	2,388	\$ 131,823.90	143,263	2,504
\$ 0.92	3,352	\$ 185,063.53	201,123	3,429
\$ 0.92	2,388	\$ 131,823.90	143,263	2,504
\$1.840	25,481	\$ 1,406,797	764,439	26,066
\$1.840	21,252	\$ 1,173,292.01	637,555	22,290
\$ 946.14	188	\$ 9,010.84	20	188
\$ 4,026.12	800	\$ 38,344.00	20	800
\$ 995.48	279	\$ 13,372.47	31	-

\$ 1,496.04	-	\$ -	-	1,240
\$ 48.88	1	\$ 23.97	1	2
\$ 0.54	588	\$ 28,194.02	105,882	2,353
\$ 48.88	5	\$ 239.65	10	1
\$ 195.51	520	\$ 24,923.60	260	520
\$ 48.88	38	\$ 1,797.38	75	1
\$ 195.51	3,900	\$ 186,927.00	1,950	3,900
\$ 48.88	7	\$ 311.55	13	19
\$ 0.54	3,824	\$ 183,261.15	688,233	14,706
\$ 48.88	1,250	\$ 59,912.50	2,500	3,750
\$ 0.27	7,035	\$ 337,174.24	2,532,500	28,139
\$ 48.88	4	\$ 191.72	8	11.5
\$ 0.54	4,706	\$ 225,552.19	847,056	18,235
	<b>166,538</b>	<b>\$ 12,896,991</b>	<b>8,739,279</b>	<b>222,260</b>
	<b>Average Labor Costs</b>	<b>Average Number of Resp</b>	<b>Average Burden Hours</b>	
	<b>\$ 14,867,951</b>	<b>17,106,680</b>	<b>204,077</b>	

AVOIDED O&M Costs	Total Hours and Costs		
	Number of Respondents/Activity	Annual Burden Hours	Total Cost/Year
\$ -	63.00	(315.00)	\$ (24,519)
\$ -	63.00	(31.50)	\$ (1,178)
\$ -	63.00	(630.00)	\$ (52,080)

\$	-	63.00	(63.00)	\$	(2,356)
\$	(4.87)	63.00	(31.50)	\$	(1,485)
\$	(0.10)	6.00	(30.00)	\$	(2,933)
\$	-	1.00	(1.72)	\$	(78)
\$	-	1.00	(2.18)	\$	(253)
\$	(11.35)	1.00	(1.00)	\$	(110)
\$	-	1.00	(0.50)	\$	(49)
\$	-	1.00	(0.10)	\$	(4)
\$	-	0.00	0.00	\$	-
\$	(5.29)	0.00	0.00	\$	-
\$	-	0.00	0.00	\$	-
\$	-	0.00	0.00	\$	-
\$	-	63.00	(15.75)	\$	(1,540)
\$	-	63.00	(15.75)	\$	(1,540)
	<b>-21.61</b>	<b>452</b>	<b>-1138</b>	<b>\$</b>	<b>(88,124)</b>



Year 2	Year 2	Year 3	Year 3	Year 3
Annual Labor Costs	Number of Annual Responses	Annual Burden Hours	Annual Labor Costs	Number of Annual Responses
\$ 7,073	141	71.8	\$ 7,230	144

\$ 7,252	144	75.4	\$ 7,586	151
\$ 1,415	28	14.37	\$ 1,446	29
\$ 1,450	29	15.1	\$ 1,517	30
\$ 5,177	103	52.6	\$ 5,292	105
\$ 3,781	75	39.3	\$ 3,955	79
\$ 21,964	218	223	\$ 22,454	223
\$ 16,042	159	167	\$ 16,780	167
\$ 10	4	0.098	\$ 10	4
\$ 10	4	0.103	\$ 10	4
\$ 1,967,706	781,976	19,985	\$ 2,011,573	799,409
\$ 1,682,701	668,714	17,488	\$ 1,760,174	699,502

\$ 132,006	52,460	1,341	\$ 134,949	53,629
\$ 297,790	118,343	3,095	\$ 311,500	123,792
\$ 1,656,646	2,057	16,826	\$ 1,693,578	2,103
\$ 1,209,971	1,503	12,575	\$ 1,265,679	1,572
\$ 104	41	1.05	\$ 106	42
\$ 76	30	0.79	\$ 79	31
\$ 10	4	0.10	\$ 10	4
\$ 10	4	0.10	\$ 10	4
\$ 517,702	205,737	5,258	\$ 529,243	210,324
\$ 378,116	150,265	3,930	\$ 395,525	157,184
\$ 347,491	207,142	3,611	\$ 363,490	216,679
\$ 345,135	205,737	3,505	\$ 352,829	210,324
\$ 230,359	137,319	2,394	\$ 240,965	143,641
\$ 828	494	8	\$ 846	505

\$ 690	411	7	\$ 722	430
\$ 43,386	25,863	451	\$ 45,384	27,054
\$ 189,309	205,737	3,505	\$ 193,529	210,324
\$ 138,267	150,265	2,620	\$ 144,632	157,184
\$ 189,309	205,737	3,505	\$ 193,529	210,324
\$ 138,267	150,265	2,620	\$ 144,632	157,184
\$ 1,439,071	781,976	26,647	\$ 1,471,152	799,409
\$ 1,230,634	668,714	23,317	\$ 1,287,294	699,502
\$ 9,011	20	188	\$ 9,011	20
\$ 38,344	20	800	\$ 38,344	20
\$ -	-	-	\$ -	-

\$ 59,433	31	1,240	\$ 59,433	31
\$ 72	3	1	\$ 24	1
\$ 112,776	423,528	2,353	\$ 112,776	423,528
\$ 24	1	1	\$ 24	1
\$ 24,924	260	520	\$ 24,924	260
\$ 24	1	1	\$ 24	1
\$ 186,927	1,950	3,900	\$ 186,927	1,950
\$ 887	37	1	\$ 24	1
\$ 704,851	2,647,050	14,706	\$ 704,851	2,647,050
\$ 179,738	7,500	1	\$ 24	1
\$ 1,348,697	10,130,000	28,139	\$ 1,348,697	10,130,000
\$ 551	23	1	\$ 24	1
\$ 874,015	3,282,342	18,235	\$ 874,015	3,282,342
<b>\$ 15,740,028</b>	<b>21,214,466</b>	<b>223,432</b>	<b>\$ 15,966,834</b>	<b>21,366,296</b>

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<b>Year</b>	<b>Total Responses</b>	<b>Total Hours</b>
Year 1	8,739,279	166,538
Year 2	21,214,466	222,260
Year 3	21,366,296	223,432
Annual Average	17,106,680	204,077

RR TSD

Leak Repair Total

Year 1

<b>Total/Yr All Respondents</b>	<b>Responses</b>
---------------------------------	------------------

Reporting	Leak Repair/Inspection Reporting	875
Recordkeeping	Leak Repair/Inspection Recordkeeping	2,469,079
Third-party Reporting	Leak Repair/Inspection Third-party Reporting	2,090,767
Reporting	Fire Suppression Reporting	20
Recordkeeping	Fire Suppression Recordkeeping	20
Reporting	Cylinder Tracking	4,178,488
Third-party Reporting	Reclamation	31
Recordkeeping	Reclamation	-
	<b>Total Reporting and Recordkeeping Recordkeeping</b>	<b>8,739,279</b>
	Reclaimer Reporting and Recordkeeping	452
	<b>Total with Avoided Costs</b>	<b>8,739,731</b>



**Total Annual Responses:** Year 1

	<b>Burden Per Response</b>	<b>Hours Per Response</b>
Reporting	Leak Repair/Inspection Reporting	0.70
Recordkeeping	Leak Repair/Inspection Recordkeeping	0.03
Third-party Reporting	Leak Repair/Inspection Third-party Reporting	0.03
Reporting	Fire Suppression Reporting	9.40
Recordkeeping	Fire Suppression Recordkeeping	40.00
Reporting	Cylinder Tracking	0.01
Third-party Reporting	Reclamation	9.00
Recordkeeping	Reclamation	0.00
	<b>Average for Reporting and Recordkeeping</b>	<b>0.02</b>

Reclaimer Reporting and Recordkeeping	-2.52
Overall Average (including avoid	0.02





<b>Total Costs</b>
\$12,896,991.26
\$15,740,028.39
\$15,966,834.14
\$14,867,951.26

11,787,755

12,199,756

11,787,755

12,199,756

Year 1	Year 1	Year 2	Year 2
Costs	Hours	Responses	Costs

\$62,044.29	616	905	\$64,173.17
\$8,511,847.30	84,566	2,558,100	\$8,810,726.71
\$3,213,863.39	58,213	2,162,695	\$3,324,856.28
\$9,010.84	188	20	\$9,010.84
\$38,344.00	800	20	\$38,344.00
\$1,048,508.96	21,876	16,492,695	\$3,433,484.19
\$13,372.47	279	-	\$0.00
\$0.00	-	31	\$59,433.20
<b>\$12,896,991.26</b>	<b>166,538</b>	<b>21,214,466</b>	<b>\$15,740,028.39</b>
(88,124)	(1,138)	452	(88,124)
<b>\$12,808,867.17</b>	<b>165,400</b>	<b>21,214,918</b>	<b>\$15,651,904.30</b>

Year 1	Year 2	Year 2	Year 3
Cost Per Response (including non-labor)	Hours Per Response	Cost Per Response (including non-labor)	Hours Per Response
\$70.93	0.70	\$70.92	0.70
\$3.45	0.03	\$3.44	0.03
\$1.54	0.03	\$1.54	0.03
\$450.54	9.40	\$450.54	9.40
\$1,917.20	40.00	\$1,917.20	40.00
\$0.25	0.00	\$0.21	0.00
\$431.37	0.00	\$0.00	0.00
\$0.00	40.00	\$1,917.20	40.00
<b>1.48</b>	<b>0.01</b>	<b>0.74</b>	<b>0.01</b>

-\$194.96	-2.52	-\$194.96	-2.52
\$1.47	0.01	\$0.74	0.01







12,607,713

12,607,713

Year 2

Year 3

Year 3

Year 3

Hours

Responses

Costs

Hours

--	--	--	--

638	935	\$66,281.44	659
87,536	2,646,228	\$9,106,662.38	90,476
60,223	2,233,926	\$3,434,769.53	62,214
188	20	\$9,010.84	188
800	20	\$38,344.00	800
71,635	16,485,136	\$3,252,332.75	67,856
-	-	\$0.00	-
1,240	31	\$59,433.20	1,240
<b>222,260</b>	<b>21,366,296</b>	<b>\$15,966,834.14</b>	<b>223,432</b>
(1,138)	452	(88,124)	(1,138)
<b>221,122</b>	<b>21,366,748</b>	<b>\$15,878,710.06</b>	<b>222,294</b>

Year 3

<b>Cost Per Response (including non-labor)</b>
\$70.90
\$3.44
\$1.54
\$450.54
\$1,917.20
\$0.20
\$0.00
\$1,917.20
<b>0.75</b>

-\$194.96
\$0.74







Average Annual		
Total/Yr All Respondents	Responses	Costs

Reporting	Leak Repair/Inspection Reporting	905	\$ 64,166.30
Recordkeeping	Leak Repair/Inspection Recordkeeping	2,557,802	\$ 8,809,745.46
Third-party Reporting	Leak Repair/Inspection Third-party Reporting	2,162,463	\$ 3,324,496.40
Reporting	Fire Suppression Reporting	20	\$ 9,010.84
Recordkeeping	Fire Suppression Recordkeeping	20	\$ 38,344.00
Reporting	Cylinder Tracking	12,385,440	\$ 2,578,108.63
Third-party Reporting	Reclamation	10	\$ 4,457.49
Recordkeeping	Reclamation	21	\$ 39,622.13
	<b>Total Reporting and Recordkeeping Recordkeeping</b>	<b>17,106,680</b>	<b>\$14,867,951.26</b>
	Reclaimer Reporting and Recordkeeping	452	\$ (88,124.09)
	<b>Total with Avoided Costs</b>	<b>17,107,132</b>	<b>\$14,779,827.18</b>







20.095209760689

20.0952097606889

	Average Annual Per Category	
Hours	Responses	Costs

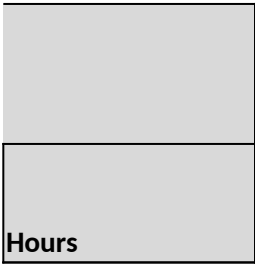
638	Reporting	12,386,590	2,607,224
87,526	Recordkeeping	2,558,069	8,843,650
60,217	Third-party Reporting	2,162,473	3,328,954
188		17,107,132	14,779,827
800			
53,789			
93			
827			
<b>204,077</b>			
(1,138)			
<b>202,939</b>			





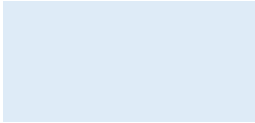






54,046
88,584
60,310

202,939









**Without Avoided Reclaimer Burden**

Year	Total Responses	Total Hours	Total Labor Costs	Total O&M Costs
Year 1 (2025)	8,739,279	166,538	\$12,896,991.26	\$0.00
Year 2 (2026)	21,214,466	222,260	\$15,740,028.39	\$0.00
Year 3 (2027)	21,366,296	223,432	\$15,966,834.14	\$0.00
3yr ICR Annual Average	17,106,680	204,077	\$14,867,951.26	\$0.00

**With Avoided Reclaimer Burden**

Year	Total Responses	Total Hours	Total Labor Costs	Total O&M Costs
Year 1 (2025)	8,739,731	165,400	\$12,808,867.17	\$0.00
Year 2 (2026)	21,214,918	221,122	\$15,651,904.30	\$0.00
Year 3 (2027)	21,366,748	222,294	\$15,878,710.06	\$0.00
3yr ICR Annual Average	17,107,132	202,939	\$14,779,827.18	\$0.00

**With Avoided Reclaimer Burden removed from average (for supporting statements)**

Year	Total Responses	Total Hours	Total Labor Costs	Total O&M Costs
Year 1 (2025)	8,739,279	166,538	\$12,896,991.26	\$0.00
Year 2 (2026)	21,214,466	222,260	\$15,740,028.39	\$0.00
Year 3 (2027)	21,366,296	223,432	\$15,966,834.14	\$0.00
Annual Average	17,106,680	204,077	\$14,867,951.26	\$0.00
Average Annual Avoided Reclaimer Burden and Costs	452	-1,138	-\$88,124.00	\$0.00
Incremental ICR Burden and Costs	17,107,132	202,939	\$14,779,827.26	\$0.00



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<b>Total Costs</b>
\$12,896,991.26
\$15,740,028.39
\$15,966,834.14
\$14,867,951.26

<b>Total Costs</b>
\$12,808,867.17
\$15,651,904.30
\$15,878,710.06
\$14,779,827.18

ent)

<b>Total Costs</b>
\$12,896,991.26
\$15,740,028.39
\$15,966,834.14
\$14,867,951.26
-\$88,124.00
\$14,779,827.26

**Subsection H Leak Repair, Inspection, AID, and Reclamation Requirements**

\*\*\* E.O. 12866 Review - Draft - Do Not Cite, Quote, or Rely on During Review \*\*\*

Leak repair (10-mechanical) Act for 2010-2015 and 10 equipment

**Annual Agency Burden and Cost**

**Assumptions**

	Median Wage (2012)	Total (1-Overhead)	
Overhead		1.65	Standard Government Benefits Multiplier
Management Rate (GS 15 Step 1)	\$15.00	\$15.00	From 2012 OPM hourly base pay table for DC region: <a href="https://www.opm.gov/policy-data-oversight/pay-benefits/volume/wage-survey-tables/pdf/2012_DCR_h.pdf">https://www.opm.gov/policy-data-oversight/pay-benefits/volume/wage-survey-tables/pdf/2012_DCR_h.pdf</a>
Technical Rate (GS 13 Step 6)	\$14.80	\$14.80	From 2012 OPM hourly base pay table for DC region: <a href="https://www.opm.gov/policy-data-oversight/pay-benefits/volume/wage-survey-tables/pdf/2012_DCR_h.pdf">https://www.opm.gov/policy-data-oversight/pay-benefits/volume/wage-survey-tables/pdf/2012_DCR_h.pdf</a>
Skilled Rate (GS 11 Step 1)	\$14.40	\$14.40	From 2012 OPM hourly base pay table for DC region: <a href="https://www.opm.gov/policy-data-oversight/pay-benefits/volume/wage-survey-tables/pdf/2012_DCR_h.pdf">https://www.opm.gov/policy-data-oversight/pay-benefits/volume/wage-survey-tables/pdf/2012_DCR_h.pdf</a>
Unskilled Rate	\$13.00	\$13.00	From 2012 OPM hourly base pay table for DC region: <a href="https://www.opm.gov/policy-data-oversight/pay-benefits/volume/wage-survey-tables/pdf/2012_DCR_h.pdf">https://www.opm.gov/policy-data-oversight/pay-benefits/volume/wage-survey-tables/pdf/2012_DCR_h.pdf</a>

**Agency Tally**

**Reporting and Responding**

Activity	Year			Number of Respondents per Respondent	Agency Hours per Activity per Respondent and Loaded Hourly Wage				Year 1			Year 2			Year 3			
	Year 1	Year 2	Year 3		Mining	Technical	Skilled	Construction	Total Annual Agency Hours	Total Agency Labor Cost	Number of Annual Responses	Total Annual Agency Hours	Total Agency Labor Cost	Number of Annual Responses	Total Annual Agency Hours	Total Agency Labor Cost	Number of Annual Responses	
	Number of Respondents	Number of Respondents	Number of Respondents															
Owners/operators of applications with 15 or more pounds of HFC refrigerant prepare & submit requests for admission to the 30-day repair timeline	275	285	294	1	-	0.25	-	-	89	\$1,460	275	75	\$1,056	285	74	\$1,030	294	
Owners/operators of applications with 15 or more pounds of HFC refrigerant prepare & submit requests for admission to 1-year online timeline	55	57	59	1	-	1	-	-	55	\$4,368	55	17	\$4,525	57	59	\$4,680	59	
Owners/operators of applications with 15 or more pounds of HFC refrigerant prepare & submit requests to create a mobile if all leaks are repaired	172	178	184	1	-	0.08	-	-	14	\$1,141	172	15	\$1,179	178	15	\$1,217	184	
Owners/operators of applications with 15 or more pounds of HFC refrigerant that leak 125 percent or more of the full charge in a calendar year to submit report on leak and intended repair	365	378	390	1	-	0.50	-	-	183	\$54,517	365	58	\$165,007	378	195	\$165,402	390	
Owners/operators of applications with 15 or more pounds of HFC refrigerant notify EPA that partial refrigerant that are determined are excluded from annual leak rate calculations for the RMI Stream	7	8	8	1	-	0.50	-	-	4	\$290	7	4	\$300	8	4	\$310	8	
HFC fire suppression equipment (CO2)/refrigerant recovery program & submit annual reports	20	20	20	1	-	0.50	-	-	10	\$795	20	10	\$795	20	10	\$795	20	
Design and Maintain a Tracking OS System	11	11	11	1	120	3,000	-	\$2,000	11	\$1,440	\$1,815,944	1	\$1,540	\$1,815,944	1	\$1,540	\$1,815,944	1
<b>SUBTOTAL</b>	<b>896</b>	<b>926</b>	<b>958</b>	<b>7</b>	<b>120</b>	<b>3,803</b>	<b>-</b>	<b>\$2,000</b>	<b>15,454</b>	<b>\$1,841,543</b>	<b>896</b>	<b>15,466</b>	<b>\$1,845,436</b>	<b>926</b>	<b>15,697</b>	<b>\$1,850,827</b>	<b>958</b>	

Requirement Type	Activity	AVOIDED Hours per Activity per Respondent and Loaded Hourly Wage				Burden Hours/Activity	Labor Costs/Activity	Capital Costs	O&M Costs	A Number of Activities	Total Hours and Costs	
		Mining	Technical	Skilled	Construction						Annual Burden Hours	Total Cost/Year
Emergency Procedures	Owner submitted release report to EPA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	Owner submits into database tracking all releases	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	Owner submit into responsive recovery activities	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	Owner submit into responsive recovery activities	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
		-	(0)	(0)	-	(0)	(140)	-	-	0	(2)	-\$40

Total/All Requirements	Year 1			Year 2			Year 3		
	Responses	Costs	Hours	Responses	Costs	Hours	Responses	Costs	Hours
Leak Detection/Inspection Reporting	875	\$2,784,201	224	905	\$2,871,599	226	935	\$2,959,640	247
Risk Assessment Reporting	20	\$794,880	10	20	\$794,880	10	20	\$794,880	10
Tracking OS System	1	\$1,817,944	15,120	1	\$1,817,944	15,120	1	\$1,817,944	15,120
<b>Total</b>	<b>896</b>	<b>\$1,844,542.60</b>	<b>15,454</b>	<b>926</b>	<b>\$1,845,436.30</b>	<b>15,466</b>	<b>958</b>	<b>\$1,851,826.54</b>	<b>11,817</b>

Response Reporting and Recordkeeping	Year 1	Year 2	Year 3
Responses	5	5	5
Costs	-\$145.10	0.00	0.00
Hours	0.00	0.00	0.00
<b>Total with Avoided</b>	<b>0</b>	<b>0</b>	<b>0</b>

Average cost: 1,692,793  
Total cost: 1,694,431

Total Annual Responses	Year 1			Year 2			Year 3		
	Responses	Costs	Hours	Responses	Costs	Hours	Responses	Costs	Hours
Leak Detection/Inspection Reporting	875	\$2,784,201	224	905	\$2,871,599	226	935	\$2,959,640	247
Risk Assessment Reporting	20	\$794,880	10	20	\$794,880	10	20	\$794,880	10
Tracking OS System	1	\$1,817,944	15,120	1	\$1,817,944	15,120	1	\$1,817,944	15,120
Response Reporting and Recordkeeping	5	-\$145.10	0.00	5	-\$145.10	0.00	5	-\$145.10	0.00
<b>Average</b>	<b>13.18</b>	<b>\$2,021,240</b>	<b>12.08</b>	<b>13.95</b>	<b>\$1,955,418</b>	<b>12.10</b>	<b>14.51</b>	<b>\$1,874,431</b>	<b>13.18</b>

Table V

\*\*\* E.O. 12866 Review – Draft – Do Not Cite, Quote, or Release During Revi

Respondent Sector	Respondent Type	Activity	Affected Equipment	Number of Respondents per Year			Total
				Y1	Y2	Y3	Y1
		Prepare and submit requests for extensions to 30-day repair timeline	15-50 pounds	137	141	144	68.7
			>50 pounds	137	144	151	68.7
		Prepare and submit requests for extensions to 1 yr retrofit/retire timeline	15-50 pounds	27	28	29	13.7
			>50 pounds	27	29	30	13.7
		Prepare and submit request to cease a retrofit if all leaks are repaired	15-50 pounds	101	103	105	50.3
			>50 pounds	72	75	79	35.8
		Prepare and submit a report to EPA if appliance leaks 125% or more of the full charge in a 365 day period to describe efforts to identify leaks and repair the appliance	15-50 pounds	213	218	223	213
			>50 pounds	152	159	167	152

HFC Equipment  
Owners &  
Operators

Prepare and submit a report to EPA if excluding purged refrigerants that are destroyed from annual leak rate calculations for the first time	15-50 pounds	4	4	4	0.09
	>50 pounds	4	4	4	0.09
Maintain purchase and service records	15-50 pounds	268,969	275,140	281,274	19,111
	>50 pounds	224,325	235,288	246,121	15,939
Maintain equipment installation records	15-50 pounds	51,283	52,460	53,629	1,282
	>50 pounds	112,829	118,343	123,792	2,821
Maintain retrofit and/or retirement plans	15-50 pounds	2,011	2,057	2,103	16,090
	>50 pounds	1,433	1,503	1,572	11,461
Maintain records documenting when the system was mothballed and when it was brought back on-line (i.e., when refrigerant was added back into the appliance or isolated component of the appliance)	15-50 pounds	40	41	42	1.01
	>50 pounds	29	30	31	0.72

Refrigeration  
and Air  
Conditioning

Maintain records of purged and destroyed refrigerant if excluding such refrigerant from the leak rate	15-50 pounds	4	4	4	0.09
	>50 pounds	4	4	4	0.09
Maintain reports on the results of verification tests any time leak rate threshold is exceeded	15-50 pounds	201,123	205,737	210,324	5,028
	>50 pounds	143,263	150,265	157,184	3,582
Maintain quarterly leak inspection records	IPR and CR >500 pounds	49,373	51,786	54,170	3,292
Maintain annual leak inspection records	15-50 pounds	201,123	205,737	210,324	3,352
	>50 pounds	130,920	137,319	143,641	2,182
Maintain copies of any reports submitted to EPA under the proposed reporting requirements in this action	15-50 pounds	482	494	505	8.0
	>50 pounds	392	411	430	6.5

	<p>Maintain records regarding the installation and annual calibration or audit of the ALD system, a record of each date the monitoring system identified a leak, and the location of the leak. Records must be maintained each time an ALD system detects a leak, whether that be based on the applicable ppm threshold for a direct ALD system or the indicated loss of refrigerant measured in an indirect ALD system.</p>	IPR and CR >1500 pounds with indirect ALD	24,658	25,863	27,054	411
	<p>Persons servicing HFC appliances provide leak inspection records to owners/operators</p>	15-50 pounds	300,000	306,882	313,724	3,352
		>50 pounds	300,000	314,662	329,149	2,388

	HFC Equipment Technicians	Persons servicing HFC appliances provide reports on the results of verification tests any time leak rate threshold is exceeded to owners/operators	15-50 pounds	300,000	306,882	313,724	3,352
			>50 pounds	300,000	314,662	329,149	2,388
		Persons servicing appliances w/charge sizes >15 lbs provide invoices to appliance owners/operators	15-50 pounds	300,000	306,882	313,724	25,481
			>50 pounds	300,000	314,662	329,149	21,252
Fire Suppression	OEMs, Servicers, & Recyclers	Annual report	HFC Fire Suppression	20	20	20	188
		Maintain records		20	20	20	800
	HFC OEMs, Servicers, & Recyclers	Register with tracking ID system		1	3	1	0.5
		Enter data into tracking ID system		1	4	4	588
Reclamation	HFC Reclaimers	One-time label redesign		31	-	-	279
		Maintain records		-	31	31	-
	HFC Producers	Register with tracking ID system		10	1	1	5.0
		Enter data into tracking ID system		10	10	10	520

Tracking ID System	HFC Importers	Register with tracking ID system	75	1	1	37.5	
		Enter data into tracking ID system	75	75	75	3,900	
	HFC Packagers	Register with tracking ID system	13	37	1	7	
		Enter data into tracking ID system	13	50	50	3,824	
	HFC Reclaimers	Register with tracking ID system	8	23	1	1,250.0	
		Enter data into tracking ID system	8	31	31	7,034.7	
	HFC Suppliers	Register with tracking ID system	2,500	7,500	1	4.0	
		Enter data into tracking ID system	2,500	10,000	10,000	4,706	
			Cylinders				



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Hours per Year		Total Cost per Year		
Y2	Y3	Y1	Y2	Y3
70.3	71.8	\$ 6,914	\$7,073	\$7,230
72.0	75.4	\$ 6,914	\$7,252	\$7,586
14.1	14.4	\$ 1,383	\$1,415	\$1,446
14.4	15.1	\$ 1,383	\$1,450	\$1,517
51.4	52.6	\$ 5,061	\$5,177	\$5,292
37.6	39.3	\$ 3,605	\$3,781	\$3,955
218	223	\$ 21,471	\$21,964	\$22,454
159	167	\$ 15,294	\$16,042	\$16,780

0.10	0.10	\$ 9	\$10	\$10
0.10	0.10	\$ 9	\$10	\$10
19,549	19,985	\$ 1,923,576	\$1,967,706	\$2,011,573
16,718	17,488	\$ 1,604,295	\$1,682,701	\$1,760,174
1,311	1,341	\$ 129,046	\$132,006	\$134,949
2,959	3,095	\$ 283,914	\$297,790	\$311,500
16,459	16,826	\$ 1,619,492	\$1,656,646	\$1,693,578
12,021	12,575	\$ 1,153,592	\$1,209,971	\$1,265,679
1.03	1.05	\$ 101	\$104	\$106
0.75	0.79	\$ 72	\$76	\$79

0.10	0.10	\$ 9	\$10	\$10
0.10	0.10	\$ 9	\$10	\$10
5,143	5,258	\$ 506,091	\$517,702	\$529,243
3,757	3,930	\$ 360,497	\$378,116	\$395,525
3,452	3,611	\$ 331,300	\$347,491	\$363,490
3,429	3,505	\$ 337,394	\$345,135	\$352,829
2,289	2,394	\$ 219,625	\$230,359	\$240,965
8.2	8.4	\$ 809	\$828	\$846
6.9	7.2	\$ 658	\$690	\$722

431	451	\$ 41,365	\$43,386	\$45,384
3,429	3,505	\$ 185,064	\$189,309	\$193,529
2,504	2,620	\$ 131,824	\$138,267	\$144,632

3,429	3,505	\$ 185,064	\$189,309	\$193,529
2,504	2,620	\$ 131,824	\$138,267	\$144,632
26,066	26,647	\$ 1,406,797	\$1,439,071	\$1,471,152
22,290	23,317	\$ 1,173,292	\$1,230,634	\$1,287,294
188	188	\$ 9,011	\$9,011	\$9,011
800	800	\$ 38,344	\$38,344	\$38,344
1.5	0.5	\$ 24	\$72	\$24
2,353	2,353	\$ 28,194	\$112,776	\$112,776
-	-	\$ 13,372	\$0	\$0
1,240	1,240	\$ -	\$59,433	\$59,433
0.5	0.5	\$ 240	\$24	\$24
520	520	\$ 24,924	\$24,924	\$24,924

0.5	0.5	\$ 1,797	\$24	\$24
3,900	3,900	\$ 186,927	\$186,927	\$186,927
18.5	0.5	\$ 312	\$887	\$24
14,706	14,706	\$ 183,261	\$704,851	\$704,851
11.5	0.5	\$ 192	\$551	\$24
18,235	18,235	\$ 225,552	\$874,015	\$874,015
3,750	1	\$ 59,913	\$179,738	\$24
28,139	28,139	\$ 337,174	\$1,348,697	\$1,348,697

Table VI - Respondent Burdent

<b>Year</b>	<b>Total Responses</b>	<b>Total Hours</b>	<b>Total Labor Costs</b>
Year 1	8,739,279	166,538	\$ 12,896,991
Year 2	21,214,466	222,260	\$ 15,740,028
Year 3	21,366,296	223,432	\$ 15,966,834
<b>Annual Average</b>	<b>17,106,680</b>	<b>204,077</b>	<b>\$ 14,867,951</b>
Avoided Reclaimer Burden	452	(1,138)	\$ (88,124)
<b>Incremental ICR Costs</b>	<b>17,107,132</b>	<b>202,939</b>	<b>\$ 14,779,827</b>

Agency Burden

<b>Year</b>	<b>Total Hours</b>	<b>Total Costs</b>
Year 1	15,454	\$1,844,543
Year 2	15,466	\$1,845,434
Year 3	11,697	\$1,391,827
<b>Annual Average</b>	<b>14,206</b>	<b>\$ 1,693,935</b>
Average Avoided Reclaimer Burden and Costs	-2	\$ (141)
<b>Annual Average with Avoided Burden and Costs</b>	<b>14,203.56</b>	<b>\$ 1,693,793</b>



**Section 608 ICR assumptions used as the basis for burden estimates for R&R associa**

\*\*\* E.O. 12866 Review – Draft – Do Not Cite, Quote, or Release During Rev

**National Refrigerant Recycling and Emissions Reduction Program,**

**Annual Respondent Burden and Cost**

**Assumptions**

	Median Wage (2021)
Refrigerant Recovery/Recycling Equipment Testing Organization	\$48.18
Refrigerant Reclaimers	\$33.18
Refrigerant Wholesalers	\$34.81
Technician Certification Programs	\$33.92
Disposal Establishments	\$26.29
Technicians	\$26.29
Owners/Operators	\$47.93
Small Can Manufacturers	\$19.01

**Respondent Tally**

Respondent	Activity
Refrigerant Recovery/ Recycling Equipment Testing Organization	Apply for approval
	Provide notice when equipment fails recertification
	Publish online list of all certified equipment
	Maintain records of equipment tested and its performance
Refrigerant Reclaimers	Submit annual activity report
	Provide certification when changing ownership or entering the market
	Maintain records of refrigerant sales transactions
Refrigerant Wholesalers	Maintain records that analysis conducted to verify that reclaimed refrigerant meets the necessary specifications
	Maintain records for refrigerant sales, including technician certification cards from purchasers employing at least one certified technician
Technician Certification Programs	Apply for approval
	Maintain list/database of technicians certified
	Submit biannual report

	Transfer records when no longer operational
	Recordkeeping by existing Technician Certification Programs
Disposal Establishments	Maintain copies of signed statements of previous refrigerant recovery by disposal establishments
Technicians	Acquire certification cards
	Maintain certification cards
	Provide invoices for serviced ODS appliances with charge sizes 50 to 500 lbs.
	Provide invoices for serviced ODS appliances with charge sizes >500 lbs.
	Provide leak inspection records to owner/operator
	Maintain disposal records for appliances with charge sizes of 5 - 50 lbs.
Owners/Operators	Prepare and submit requests for extensions to 30-day repair timeline
	Prepare & submit requests for extensions to 1 yr retrofit/retire timeline
	Prepare and submit request to cease a retrofit/retirement if all leaks are repaired
	Prepare and submit report on efforts to repair chronically leaking appliances
	Maintain records of the full charge of an appliance
	Maintain records of the leak rate calculation
	Maintain purchase and service records
	Maintain leak inspection records
	Maintain reports on the results of verification tests
	Develop/maintain plan to retire/replace or retrofit equipment, as applicable
	Maintain records on mothballed equipment
	Maintain information on purged/destroyed refrigerant
Small Can Manufacturers	Maintain records of self-sealing valve test data and log forms for 3 years
<b>SUBTOTAL</b>	

<b>Total Number of Respondents</b>
572,727

**ted with leak repair and leak inspection under Subsection H**

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**EPA ICR Number: 1626.18, OMB Control Number: 2060-025**

<b>Total (+ Overhead)</b>	
110%	
<b>\$101.18</b>	Median hourly earnings for environmental engineers (17-2081) from the Bureau of Economic Analysis
<b>\$69.68</b>	Median hourly earnings for chemical plant and system operators (51-8091) from the Bureau of Economic Analysis
<b>\$73.10</b>	Median hourly earnings for sales representatives, wholesale (41-4012) from the Bureau of Economic Analysis
<b>\$71.23</b>	Median hourly earnings for instructional coordinators (25-9031) from the Bureau of Economic Analysis
<b>\$55.21</b>	Assumes a technician is needed for disposal of equipment. Median hourly earnings for equipment repairers (51-8091) from the Bureau of Economic Analysis
<b>\$55.21</b>	Median hourly earnings for heating, air-conditioning, and refrigeration mechanics (51-8091) from the Bureau of Economic Analysis
<b>\$100.65</b>	Median hourly earnings for health and safety engineers (17-2111) from the Bureau of Economic Analysis
<b>\$39.92</b>	Median hourly earnings for Weighers, Measurers, Checkers, and Samplers, Record Keepers (41-4012) from the Bureau of Economic Analysis

Number of Respondents	Number of Responses per Respondent	Burden Hours (Time) per Response	Per Respondent	
			Annual Burden Hours	Annual Labor Cost
-	1	8.00	8.0	\$809.42
2	1	0.50	0.5	\$50.59
2	1	0.50	0.5	\$50.59
2	1	0.50	0.5	\$50.59
56	1	9.37	9.4	\$652.82
2	1	5.00	5.0	\$348.39
56	50	0.23	11.7	\$812.91
56	260	0.02	4.3	\$301.94
10,000	260	0.03	8.7	\$633.54
3	1	5.00	5.0	\$356.16
74	2	0.08	0.2	\$11.87
74	2	1.00	2.0	\$142.46

1	1	8.00	8.0	\$569.86
74	1	5.00	5.0	\$356.16
7,500	260	0.06	15.2	\$837.34
30,000	1	0.02	0.02	\$0.92
300,000	1	0.02	0.02	\$0.92
300,000	2.2	0.03	0.1	\$4.06
300,000	2.0	0.03	0.1	\$3.63
300,000	0.55	0.02	0.0	\$0.51
300,000	12	0.02	0.2	\$11.04
25	1	0.50	0.5	\$50.33
5	1	0.50	0.5	\$50.33
5	1	0.50	0.5	\$50.33
125	1	1.00	1.0	\$100.65
255,083	1	0.05	0.1	\$5.03
255,083	6.25	0.02	0.1	\$10.49
255,083	6.25	0.03	0.2	\$15.74
166,175	2.73	0.02	0.05	\$4.59
166,175	1	0.03	0.03	\$2.52
2,745	1	8.00	8.0	\$805.22
137	1	0.03	0.03	\$2.52
4	1	0.03	0.03	\$2.52
12	12	0.03	0.3	\$11.98
<b>572,727</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>	<b>varies</b>

Total Number of Annual Responses	Total Annual Hour Burden	Total Annual Labor Costs
13,698,513	425,514	\$31,432,946

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ureau of Labor Statistics (<http://www.bls.gov/oes/current/oes172081.htm>)  
 m the Bureau of Labor Statistics (<http://www.bls.gov/oes/current/oes172081.htm>)  
 e Bureau of Labor Statistics (<http://www.bls.gov/oes/current/oes412000.htm>)  
 au of Labor Statistics (<http://www.bls.gov/oes/current/oes259031.htm>)  
 ings for heating, air-conditioning, and refrigeration mechanics and installers from the Bureau of Labor Statistics (<http://www.bls.gov/oes/current/oes172111.htm>)  
 reau of Labor Statistics (<http://www.bls.gov/oes/current/oes172111.htm>)  
 ordkeeping occupational workers from the Bureau of Labor Statistics

All Respondents			
Annual Burden Hours	Annual Labor Costs	Number of Annual Responses	
-	\$0	-	1
1	\$101	2	1
1.00	\$101	2	3
1.000	\$101	2	2
525	\$36,558	56	1
10	\$697	2	1
653	\$45,523	2,800	2
243	\$16,909	14,560	2
86,667	\$6,335,420	2,600,000	2
15	\$1,068	3	1
12	\$879	148	2
148	\$10,542	148	1

8	\$570	1	1
370	\$26,356	74	2
113,750	\$6,280,024	1,950,000	2
500	\$27,605	30,000	3
5,000	\$276,045	300,000	2
22,079	\$1,218,954	662,367	3
19,700	\$1,087,617	591,000	3
2,770	\$152,906	166,175	3
60,000	\$3,312,540	3,600,000	2
13	\$1,258	25	1
3	\$252	5	1
3	\$252	5	1
125	\$12,582	125	1
12,754	\$1,283,743	255,083	2
26,588	\$2,676,154	1,595,275	2
39,882	\$5,236,883	1,595,275	2
7,574	\$762,319	166,175	2
4,154	\$418,150	166,175	2
21,960.0	\$2,210,340	2,745	2
3	\$345	137	2
0.1	\$9	4	2
4	\$144	144	2
<b>425,514</b>	<b>\$31,432,946</b>	<b>13,698,513</b>	

Total/Yr All Respondents	Responses	Costs
Reporting	372.00	\$63,879.84
Recordkeeping	12,248,596.94	\$28,881,883.45
Third Party	1,449,543.99	\$2,487,182.87
<b>Total</b>	<b>13,698,513</b>	<b>31,432,946</b>

**Total Annual Responses:** 13,698,513

Burden Per Response	Hours Per Response	Cost Per Response (including non-labor)
Reporting	2.28	\$171.72
Recordkeeping	0.03	\$2.36
Third Party	0.03	\$1.72

Average	0.03	\$2.29
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Annual Burden	Annual Time Burden (Hours)	Annual non-labor costs
Reporting	849	N/A
Recordkeeping	379,615	N/A
Third Party	45,049	N/A



<b>Hours</b>
849.17
379,615.17
45,049.48
<b>425,513.83</b>

-

### Labeling and Packaging Burden Assumptions

Activity	Hours per Response	Basis for Assumptions
Administrative (Redesign)	3.5	Redesign costs only applies when new label or packaging needs to be designed.
Graphic Design (Redesign)	5.5	