

U.S. Environmental Protection Agency
Information Collection Request

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

OMB Control Number: 2060-0759

EPA ICR Number: 2742.02

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

For the three years covered by this ICR (i.e., 2025-2027), the total respondent burden associated with this information collection will average 17,938 hours per year and the respondent cost will average \$6,944,962 per year. This includes \$5,137,952 per year for operation and maintenance and an average of \$1,807,010 per year for labor. Over the same time period, the total estimated cost for EPA of the information collection will average \$85,992 per year. The total estimated cost for all respondents and EPA will average \$7,030,954 per year.

Supporting Statement A

1. NEED AND AUTHORITY FOR THE COLLECTION

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

This information collection is authorized under the AIM Act (Section 103 in Division S, Innovation for the Environment, of the Consolidated Appropriations Act, 2021 (Pub. L. 116- 260)) codified at 42 U.S.C. 7675. In subsection (k)(1)(A), the AIM Act provides EPA with the authority to promulgate such regulations as are necessary to carry out EPA’s functions under the Act. Consistent with the AIM Act’s provision that “the Administrator may by rule restrict, fully, partially, or on a graduated schedule, the use of a regulated substance in the sector or subsector in which the regulated substance is used,” and to ensure compliance with these restrictions, persons who domestically manufacture or import products using regulated substances shall submit to the Administrator reports, maintain records, and implement labeling requirements on products that use

or are intended to use HFCs. The reports provide the quantity of the regulated substance contained in products that the person manufactured or imported as well as the quantity of products that are shipped without HFCs but intended to use HFCs upon installation. Additional records must be maintained, as are additional reports to document compliance. The labels indicate the name of the regulated substance contained in each product, along with the date of manufacture or first charging, as applicable.

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

2. PRACTICAL UTILITY/USERS OF THE DATA

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

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

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

3. USE OF TECHNOLOGY

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

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

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

4. EFFORTS TO IDENTIFY DUPLICATION

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

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

EPA intends to harmonize the collection of many of the reports required by this ICR with existing reports already collected through the electronic Greenhouse Gas Reporting Tool (e-GGRT), which is the web-based system used to collect data under the GHGRP, thus minimizing duplicative reporting between the AIM Act and GHGRP.

5. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

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

6. CONSEQUENCES OF LESS FREQUENT COLLECTION

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

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

7. GENERAL GUIDELINES

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

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

8. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

The proposed rulemaking “Phasedown of Hydrofluorocarbons: Restrictions on the Use of Certain Hydrofluorocarbons under Subsection (i) of the American Innovation and Manufacturing Act of 2020” published on 12/15/22 (87 FR 76738) and served as the public notice for this ICR.

8b. Consultations

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

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

EPA collected comments on the proposed rulemaking “Phasedown of Hydrofluorocarbons: Restrictions on the Use of Certain Hydrofluorocarbons under Subsection (i) of the American Innovation and Manufacturing Act of 2020.” Many commenters recommended annual reporting rather than quarterly reporting as proposed. Commenters also expressed concern with needing to report on the installation of new systems; the specific date of import or manufacture; and include the specific global warming potential (GWP) on product labels. EPA is adjusting the labeling, reporting, and recordkeeping requirements in the final rule based on the comments received.

9. PAYMENTS OR GIFTS TO RESPONDENTS

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

N/A

10. ASSURANCE OF CONFIDENTIALITY

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

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

11. JUSTIFICATION FOR SENSITIVE QUESTIONS

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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

12. RESPONDENT BURDEN HOURS & LABOR COSTS

Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.
 - If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.
 - Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.
-

12a. Respondents/NAICS Codes

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

Table I. NAICS Classification of Potentially Affected Entities

NAICS Code	NAICS Industry Description
238220	Plumbing, Heating, and Air-Conditioning Contractors
311812	Commercial Bakeries
321999	All Other Miscellaneous Wood Product Manufacturing
322299	All Other Converted Paper Product Manufacturing
324191	Petroleum Lubricating Oil and Grease Manufacturing
324199	All Other Petroleum and Coal Products Manufacturing
325199	All Other Basic Organic Chemical Manufacturing
325211	Plastics Material and Resin Manufacturing
325412	Pharmaceutical Preparation Manufacturing

NAICS Code	NAICS Industry Description
325414	Biological Product (except Diagnostic) Manufacturing
325998	All Other Miscellaneous Chemical Product and Preparation Manufacturing
326150	Urethane and Other Foam Product
326299	All Other Rubber Product Manufacturing
327999	All Other Miscellaneous Nonmetallic Mineral Product Manufacturing
332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers
332999	All Other Miscellaneous Fabricated Metal Product Manufacturing
333415	Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment Manufacturing
333511	Industrial Mold Manufacturing
333912	Air and Gas Compressor Manufacturing
333999	All Other Miscellaneous General Purpose Machinery Manufacturing
334419	Other Electronic Component Manufacturing
335220	Major Household Appliance Manufacturing
336120	Heavy Duty Truck Manufacturing
336212	Truck Trailer Manufacturing
336214	Travel Trailer and Camper Manufacturing
3363	Motor Vehicle Parts Manufacturing
3364	Aerospace Product and Parts Manufacturing
336411	Aircraft Manufacturing
336611	Ship Building and Repairing
336612	Boat Building

NAICS Code	NAICS Industry Description
336992	Military Armored Vehicle, Tank, and Tank Component Manufacturing
337214	Office Furniture (Except Wood) Manufacturing
339112	Surgical and Medical Instrument Manufacturing
339113	Surgical Appliance and Supplies Manufacturing
339999	All Other Miscellaneous Manufacturing
423120	Motor Vehicle Supplies and New Parts Merchant Wholesalers
423450	Medical, Dental, and Hospital Equipment and Supplies Merchant Wholesalers
423610	Electrical Apparatus and Equipment, Wiring Supplies, and Related Equipment Merchant Wholesalers
423620	Household Appliances, Electric Housewares, and Consumer Electronics Merchant Wholesalers
423690	Other Electronic Parts and Equipment Merchant Wholesalers
423720	Plumbing and Heating Equipment and Supplies (Hydronics) Merchant Wholesalers
423730	Warm Air Heating and Air-Conditioning Equipment and Supplies Merchant Wholesalers
423740	Refrigeration Equipment and Supplies Merchant Wholesalers
423830	Industrial Machinery and Equipment Merchant Wholesalers
423840	Industrial Supplies Merchant Wholesalers
423850	Service Establishment Equipment and Supplies Merchant Wholesalers
423860	Transportation Equipment and Supplies (except Motor Vehicle) Merchant Wholesalers
423990	Other Miscellaneous Durable Goods Merchant Wholesalers
424690	Other Chemical and Allied Products Merchant Wholesalers
424820	Wine and Distilled Alcoholic Beverage Merchant Wholesalers
443142	Electronics Stores
444190	Other Building Material Dealers

NAICS Code	NAICS Industry Description
445110	Supermarkets and Other Grocery (except Convenience) Stores
445131	Convenience Retailers
445298	All Other Specialty Food Retailers
449210	Appliance Stores, Household-Type
453998	All Other Miscellaneous Store Retailers (except Tobacco Stores)
45711	Gasoline Stations With Convenience Stores
481111	Scheduled Passenger Air Transportation
531120	Lessors of Nonresidential Buildings (except Mini warehouses)
541330	Engineering Services
541380	Testing Laboratories
541512	Computer Systems Design Services
541519	Other Computer Related Services
541620	Environmental Consulting Services
562111	Solid Waste Collection
562211	Hazardous Waste Treatment and Disposal
562920	Materials Recovery Facilities
621498	All Other Outpatient Care Centers
621999	All Other Miscellaneous Ambulatory Health Care Services
72111	Hotels (Except Casino Hotels) and Motels
72112	Casino Hotels
72241	Drinking Places (Alcoholic Beverages)
722513	Limited-Service Restaurants

NAICS Code	NAICS Industry Description
722514	Cafeterias, Grill Buffets, and Buffets
722515	Snack and Nonalcoholic Beverage Bars
81119	Other Automotive Repair and Maintenance
811219	Other Electronic and Precision Equipment Repair and Maintenance
811412	Appliance Repair and Maintenance
922160	Fire Protection

12b. Information Requested

Data items

Any entity that domestically manufactures or imports products or certain refrigeration, air conditioning, and heat pump (RACHP) components (*i.e.*, compressors, condensers, and evaporators) containing or using HFCs for use in refrigeration, air-conditioning and heat pumps; foams; and aerosols must ensure that the products are labeled, report information on an annual basis, and maintain records. The information required for each of these activities includes the following:

Equipment Labeling Requirements:

- The HFC or blend using an HFC in the product;
- The date of manufacture and the date of first charge for field charged equipment (at minimum the four-digit year);
- An indication of charge sizes for products in certain RACHP subsectors;
- An indication of the designed exiting fluid temperature range for certain RACHP subsectors; and
- For specified components for use with HFCs that exceed the GWP limit, the label must also state "For servicing existing equipment only."

Manufacturers and Importers Reporting Requirements:

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

Manufacturers and Importers Recordkeeping Requirements:

- The sector and/or subsector of each imported or manufactured product or component containing an HFC or blend using an HFC;
- The identity of each HFC or blend using an HFC contained in the product or component, or intended to be used in the component;
- The total mass in metric tons of each HFC or blend using an HFC contained in the product or component;
- The charge size of each product containing an HFC or blend using an HFC, or intended to be used in the product;
- The number of imported, manufactured, or exported products or components containing an HFC or blend using an HFC, or intended to be used in the component;
- The year(s) in which the products or components containing an HFC or blend using an HFC were imported, manufactured, or exported; and
- For importers, a copy of the bill of lading for the import, the invoice for the import, the U.S. Customs entry documentation, ports of entry through which the products or components passed, and countries from which the products or components were imported.

12c. Respondent Activities

Respondent Activities

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

Table II. Respondent Activities by Sector

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

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

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

EPA recognizes that existing labels may already include the required information and would be sufficient to meet the requirements. The labeling and packaging requirements are designed to aid EPA in compliance monitoring and enforcement actions and may ease inspection by EPA and U.S. Customs.

12d. Respondent Burden Hours and Labor Costs

EPA identified four information collection activities that are mandated by EPA’s rulemaking. EPA estimated the amount of time associated with each activity based on EPA’s experience collecting similar activity data on products containing HFCs under 40 CFR part 84 and the GHGRP (74 FR 56260; October 30, 2009) and ODS under 40 CFR part 82. This analysis assumes that all respondent burden hours are incurred by technical, clerical, marketing, and graphic design staff at companies that submit reports and develop product labels and/or packaging. Error: Reference source not found below summarizes the number of burden hours incurred by each respondent for each information collection activity.

Table III. Hours and Costs per Respondent Activity

Respondent Sector	Activity	Responses per Respondent per Year	Technical Hours per Response	Clerical Hours per Response	Marketing Hours per Response	Graphic Design Hours per Response	Total Hours per Respondent per Year	Labor Cost per Respondent per Year	O&M Costs per Respondent per Year
Refrigeration and Air Conditioning	One-time label development/redesign	1	0.0	0.0	5.3	8.4	13.6	\$1,732	\$0
	Label printing and affixing	0	0.0	0.0	0.0	0.0	0.0	\$0	\$0
	Submit annual report	1	28.0	2.0	0.0	0.0	30.0	\$3,688	\$0
	Maintain records	1	0.0	20.0	0.0	0.0	20.0	\$1,280	\$50
Foams	One-time label development/redesign	1	0.0	0.0	5.3	8.4	13.6	\$1,732	\$0
	Label printing and affixing	831,315	0.0	0.0	0.0	0.0	0.0	\$0	\$83,132

Respondent Sector	Activity	Responses per Respondent per Year	Technical Hours per Response	Clerical Hours per Response	Marketing Hours per Response	Graphic Design Hours per Response	Total Hours per Respondent per Year	Labor Cost per Respondent per Year	O&M Costs per Respondent per Year
	Submit annual report	1	28.0	2.0	0.0	0.0	30.0	\$3,688	\$0
	Maintain records	1	0.0	20.0	0.0	0.0	20.0	\$1,280	\$50
Aerosols	One-time label development/redesign	1	0.0	0.0	5.3	8.4	13.6	\$1,732	\$0
	Label printing and affixing	0	0.0	0.0	0.0	0.0	0.0	\$0	\$0
	Submit annual report	1	28.0	2.0	0.0	0.0	30.0	\$3,688	\$0
	Maintain records	1	0.0	20.0	0.0	0.0	20.0	\$1,280	\$50

Table IV. Agency Burden and Cost Table

Activity	Managerial Hours per Activity	Technical Hours per Activity	Clerical Hours per Activity	Contract or Hours per Activity	Number of Activities			Total Hours			Total Cost		
					Y1	Y2	Y3	Y1	Y2	Y3	Y1	Y2	Y3
Review Data for Reporting Completeness and Compliance	0.0	0.3	0.0	1.0	341	341	341	454	454	454	\$53,722	\$53,722	\$53,722
Provide Reporting Guidance	0.0	2.0	0.0	2.0	40	40	40	160	160	160	\$16,993	\$16,993	\$16,993
Conduct Stakeholder Outreach Efforts	4.0	40.0	0.0	80.0	1	0	0	124	0	0	\$14,173	\$0	\$0
Expand the Data Tracking System	20.0	40.0	0.0	200.0	1	0	0	260	0	0	\$31,656	\$0	\$0

Table V. Respondent Burden and Cost Table

Respondent Sector	Activity	Respondents per Activity per Year			Total Hours per Year			Total Cost per Year		
		Y1	Y2	Y3	Y1	Y2	Y3	Y1	Y2	Y3
Refrigeration and Air Conditioning	One-time label development/redesign	128	0	0	1,744	0	0	\$221,736	\$0	\$0
	Label printing and affixing	0	0	0	0	0	0	\$0	\$0	\$0
	Submit annual report	256	256	256	7,680	7,680	7,680	\$944,069	\$944,069	\$944,069
	Maintain records	256	256	256	5,120	5,120	5,120	\$340,521	\$340,521	\$340,521
Foams	One-time label development/redesign	62	0	0	839	0	0	\$106,711	\$0	\$0
	Label printing and affixing	62	62	62	0	0	0	\$5,120,902	\$5,120,902	\$5,120,902
	Submit annual report	77	77	77	2,310	2,310	2,310	\$283,958	\$283,958	\$283,958
	Maintain records	77	77	77	1,540	1,540	1,540	\$102,422	\$102,422	\$102,422
Aerosols	One-time label development/redesign	6	0	0	82	0	0	\$10,394	\$0	\$0
	Label printing and affixing	0	0	0	0	0	0	\$0	\$0	\$0
	Submit annual report	8	8	8	240	240	240	\$29,502	\$29,502	\$29,502
	Maintain records	8	8	8	160	160	160	\$10,641	\$10,641	\$10,641

Bottom Line Burden Hours and Cost Tables

Respondent Tally

As shown in Table VI, EPA estimates the total annual hour and cost burden to all respondents to average 17,938 hours and \$6,944,962.

Table VI. Respondent Burden Summary Table

Year	Total Responses	Total Hours	Total Labor Costs	Total O&M Costs	Total Costs
Year 1	51,209,894	19,715	\$2,032,904	\$5,137,952	\$7,170,856
Year 2	51,209,698	17,050	\$1,694,063	\$5,137,952	\$6,832,015
Year 3	51,209,698	17,050	\$1,694,063	\$5,137,952	\$6,832,015
Annual Average	51,209,764	17,938	\$1,807,010	\$5,137,952	\$6,944,962

13. RESPONDENT CAPITAL AND O&M COSTS

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Estimating Respondent Costs

To determine respondent costs, an average hourly wage rate of \$60.54 for technical staff, the hourly wage rate for professional and related persons, was derived from the Bureau of Labor Statistics (BLS) Employer Costs for Employee Compensation, Table 2, ("civilian workers, by occupational and industry group"), June 2022. An average hourly wage rate of \$30.48 for clerical staff, the hourly wage rate for office and administrative support staff, was derived from the BLS Employer Costs for Employee Compensation, Table 2, ("civilian workers, by occupational and industry group"), June 2022. A 110 percent increase was added to reflect the estimated additional costs for overhead (a fringe rate of 31.2 percent is included in the average hourly wage rates presented in BLS Employer Costs for Employee Compensation, Table 2, June 2022), which

increased the wage rates to \$127.13 and \$64.01 per hour for technical staff and clerical staff, respectively. Burden hours were multiplied by the labor rate to determine respondent costs.

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

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

Error: Reference source not found below summarizes annual labor and O&M costs for each respondent by information collection activity. Costs are calculated by multiplying burden hours per response by the number of responses per year by the assumed hourly wage rates of staff. The number of responses per year are based on the reporting frequency of each activity (as outlined in Table II), market research on the affected industries, and EPA's experience collecting data under Subpart QQ of the GHGRP.

The respondent universe for this ICR is based on a review of HFC-containing product data collected under the GHGRP and market research on the affected industries, including a review of existing labeling practices for affected equipment. In total, EPA estimates 341 unique respondents are subject to the information collection requirements outlined in this ICR. This estimate takes into account the fact that the respondent types specified in Table II are not mutually exclusive, meaning a given respondent may be subject to more than one information collection activity.

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

14. AGENCY COSTS

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. Agency Activities

Activities associated with this information collection request include the following:

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

14b. Agency Labor Cost

EPA identified four activities incurred by the federal government associated with this data collection request. Burden associated with each activity is based on EPA's experience with reporting and data collection of HFCs and ODS. The number of occurrences of each activity is based on the estimated number of responses per year for each year of this ICR (as discussed further question 13).

Costs are subdivided into Agency and contractor costs. The average hourly rates for EPA technical and managerial staff of \$51.18 and \$71.15, respectively, are derived from the 2022 annual base pay table, which was retrieved from the Office of Personnel Management website. The rate for technical staff is based on a GS-13 step 1 salary and the rate for managerial staff is based on a GS-15 step 1 salary. These rates were then multiplied by the standard government benefits multiplication factor of 1.6 to get hourly rates of \$81.89 for technical staff and \$113.84 for managerial staff. The cost of contractor time is valued at \$130.52 per hour on average, including overhead and fringe. This rate takes into account a weighted average of managerial and technical staff hours, based on rates for Senior Technical Analyst III and Consultant I approved under EPA Contract #68HERH19D0029. Error: Reference source not found summarizes total agency burden and costs by activity.

The Agency Tally

As shown in Table VII, EPA estimates the total annual hour and cost burden to the Agency to average 742 hours and \$85,992.

Table VII. Agency Burden Summary Table

Year	Total Hours	Total Costs
Year 1	998	\$116,544
Year 2	614	\$70,715
Year 3	614	\$70,715
Annual Average	742	\$85,992

14c. Agency Non-Labor Costs

XXXX

15) REASONS FOR CHANGE IN BURDEN

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

This is a new information collection request.

16) PUBLICATION OF DATA

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

N/A

17) DISPLAY OF EXPIRATION DATE

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

N/A

18) CERTIFICATION STATEMENT

Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

N/A

