

** E.O. 12866 Review – Draft – Do Not Cite, Quote, or Release During Review ***

Respondents	
Total Number of Respondents:	781,563
Number of these which are small entities:	239,385
Percentage of Respondents Reporting Electronically: (%)	100%

picked maximum across Year 1-3

Small businesses impacted by Reporting and Recordkeeping Requirements (from SBREFA)

Sector	Total Businesses Firm	Total Small Businesses Firms
Grocery & Specialty Food Stores	53,301	48,556
Warehouse Clubs & Supercenters	7	0
Ag. & Crop Production	3,212	3,015
Utilities	11,061	4,146
Food manufacturing	24,107	3,788
Beverage & Ice Manufacturing	9,010	424
Non-food Manufacturing	43,271	43,271
General Merchandise Stores	18,641	0
Refrig. Warehousing & Storage	446	399
Other Warehousing, Stor, Trans.	59,271	50,882
Non-durable Goods	38,626	2,364
Durable Goods	88,485	867
Educational Services	38,185	175
Hospitals	1,096	354
Research and Devel.	13,719	0
Office Buildings	1,996,846	9,594
Arts, Entertainment, Rec.	3,219	183
Fitness and Rec Sports	31,985	387
Charter Bus Industry	1,029	920
School Districts	13,029	12,187
City Governments	2,276	2,276
Materials Recovery Facilities (Reclaimers)	37	32
Refrigeration Equipment and Supplies Merchant Wholesalers	605	280
Warm Air Heating and Air-Conditioning Equipment and Supplies Merchant Wholesalers	2,143	1,017
Other Chemical and Allied Products Merchant Wholesalers	5,803	2,755
Disposal and Recycling Facilities	1,611	1,541
Refrigerant Technicians	50,705	49,964

Fire Suppression Manufacturers	20	8
Total	2,511,746	239,385

Subsection H Leak Repair, Inspection, ALD, and

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

Assumptions

	Median Wage (2023)
Overhead	
Ref/AC Technicians	\$27.55
Owners/Operators	\$49.85
Manager	\$56.19
Technician (Reclaimer)	\$38.48
Refrigerant Wholesalers	\$31.56
Disposal Establishment	\$51.19
Lawyer	\$70.08
Office Clerk, General Administration	\$19.46
Marketing Manager	\$75.78
Graphic Designer	\$28.32

2026

Affected Equipment (above LR threshold)	Year 1
15-50 pounds (including school buses above	200,251
50+ pounds	154,496
50+ pound appliances with quarterly reportin	19,234
CR and IPR Appliances above LR with charge s	5,392
CR and IPR Appliances above LR with charge s	5,392
Assumed equipment per facility (from CARB d	2.8

New Equipment Installations	Year 1
15-50 pounds (including school buses above	24,850
50+ pounds	13,735
CR and IPR Appliances with charge size > 150C	147
CR and IPR Appliances with charge size > 150C	147

Existing Equipment Installations	Year 1
15-50 pounds (including school buses above	757,062
50+ pounds	587,210

Estimated HFC and HFC Cylinders sold per year	
	4,455,000 Assumed cylinders sold per yea
	Year 1
% Cylinders with HFCs or HFC/HFO blends	78%
HFC Cylinders sold per year	3,463,870

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Requirement Type	Respondent type
Reporting	Owners/operators
Reporting	Owners/operators
Reporting	Owners/operators
Reporting	Owners/operators
Reporting	Owners/operators
Reporting	Owners/operators
Reporting	Owners/operators
Reporting	Owners/operators
Reporting	Owners/operators
Reporting	Owners/operators
Recordkeeping	Owners/operators
Recordkeeping	Owners/operators

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

Leak

Recordkeeping	Owners/operators
Recordkeeping	Owners/operators
Recordkeeping	Owners/operators
Recordkeeping	Owners/operators
Recordkeeping	Owners/operators
Recordkeeping	Owners/operators
Recordkeeping	Owners/operators
Recordkeeping	Owners/operators
Recordkeeping	Owners/operators
Recordkeeping	Owners/operators
Recordkeeping	Owners/operators
Recordkeeping	Owners/operators
Third-party Reporting	Tehnicians
Third-party Reporting	Tehnicians
Third-party Reporting	Tehnicians
Third-party Reporting	Tehnicians
Third-party Reporting	Technicians
Third-party Reporting	Technicians

Leak

Fire	Reporting	Fire Suppression System OEMs/Service/Recyclers
	Recordkeeping	Fire Suppression System OEMs/Service/Recyclers
Fire Reclaim	Third-party Reporting	HFC Reclaimers
Reclaim	Recordkeeping	HFC Reclaimers
	Reporting	Refrigerant Reclaimers
Reclaim Reclaim	Reporting	Refrigerant Wholesalers and Distributors

Third-party Reporting	Refrigerant Technician	
Recordkeeping	Final processor	

Requirement Type	Respondent type
Contingency Planning	Reclaimer
	Reclaimer
	Reclaimer
	Reclaimer
	Reclaimer
	Reclaimer
	Final processor
	Final processor
	Final processor

	Final processor
	Final processor
	Final processor
Emergency Procedures	Reclaimer
	Reclaimer
	Reclaimer
	Reclaimer
	Reclaimer
	Reclaimer
	Reclaimer
	Final processor
	Final processor
	Final processor
	Final processor
	Final processor
	Final processor
	Final processor
	Final processor
Personnel Training	Reclaimer
	Reclaimer
	Final processor
	Final processor
No Speculative Accumulation 40 CFR 266.602(a)(2) and (b)(3)	Reclaimer
	Reclaimer
	Final processor

No Speculative Accumulation 40 CFR
266.602(a)(2) and (b)(3)

Final processor

d Reclamation Requirements

*** E.O.

R and IPR equipment (new in 2026, 2017-2025 existing systems in 2027) (50/50 direct and indirect ALD)

Total (+ Overhead)	
110%	
\$57.86	Median hourly earnings for heating, air-conditioning, and re
\$104.69	Median hourly earnings for health and safety engineers (17-
\$118.00	Median hourly earnings for management occupations (11-0
\$80.81	Median hourly earnings for chemical plant and system oper
\$66.28	Median hourly earnings for sales representatives, wholesale
\$107.50	Median hourly earnings for Administrative Services Manage
\$147.17	Median hourly earnings for lawyers (23-1011) from the Bur
\$40.87	Median hourly earnings for office clerks, general (43-9061) f
\$208.63	Median hourly earnings for marketing managers (11-2021) f
\$77.97	Median hourly earnings for graphic designers (27-1024) fro

2027	2028
Year 2	Year 3
199,257	197,056
155,492	156,203
19,078	18,384
14,483	14,124
14,483	14,124

Year 2	Year 3
25,240	25,600
13,614	13,632
11,049	67
11,049	67

Year 2	Year 3
749,300	735,387
592,867	597,781

Year 2	Year 3
77%	76%
3,418,197	3,370,585



Activity	Reg Text Citation	Affected Equipment
Prepare and submit requests for extensions to 30-day repair timeline	84.106(m)(1)	IPR, CC, and CR 15-50 pounds
		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
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	84.106(l)(2); 84.106(l)(11)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds

Maintain equipment installation records: (i) The identification of the owner or operator of the appliance; (ii) The address where the appliance is located; (iii) The full charge of the appliance and the method for how the full charge was determined; (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; (v) Any revisions of the full charge, how they were determined, and the dates such revisions occurred; and (vi) The date of installation.	84.106(l)(1)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds
Owners or operators must maintain records of changes to the leak rate calculation method after a change in ownership. Records must include: (i) Basic identification information (i.e., owner name or operator, facility name, facility address where appliance is located, and appliance ID or description); (ii) The date an operating facility was purchased; (iii) The leak rates for all refrigerant-containing appliances at the operating facility when both leak rate calculation methods are applied; (iv) The date a new leak rate calculation method is adopted; and (v) The leak rate calculation method the owner or operator is using after the change.		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	84.106(l)(8)	IPR, CC, and CR 15-50 pounds

brought back online (i.e., when refrigerant was added back into the appliance or isolated component of the appliance)	84.106(l)(7)	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 requirements in this action	84.106(l)(8);84.106(l)(12)	IPR, CC, and CR 15-50 pounds
		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
(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	84.106(l)(3)	IPR, CC, and CR 15-50 pounds
		IPR, CC, and CR >50 pounds

must report annually: (i) The quantity of material (combined 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 the disposal facility if waste is not processed by the reporting entity	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
Two-time reporting from reclaimers/distributors/wholesalers who sell reclaimed HFCs to report on the data types and volumes of reclaimed HFC refrigerants sold for use in servicing/repair of equipment in the covered subsector		NA
		NA

Certification statement accompanying those who choose the alternate method to get a disposable cylinder evacuated to a specified level of vacuum (15 in-Hg) so that the cylinder can be discarded and then no longer need additional processing for heel removal	84.112().	Cylinders undergoing heel recovery
Maintain records on: - Signed cylinder evacuation certification statement from technician	84.112().	Cylinders undergoing heel recovery
ANNUAL TOTAL		
3 YEAR TOTAL		
ANNUAL AVERAGE		
Unique Respondents		

Activity	AVOIDED Hours per Activity per Respondent	
	Legal	Manager
	\$147.17	\$118.00
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 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)
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
Collect information	0.00	0.00
Emergency reporting	(1.28)	0.00
Notifying/coordination with authorities	0.00	(0.10)
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
Collect job-related data	0.00	0.00
Maintain information at facility	0.00	0.00
Collect job-related data	0.00	0.00
Maintain information at facility	0.00	0.00
Label containers in accumulation area with start date		
Inventory logs must demonstrate that at least 75% by weight or volume of material being recycled is transferred to a different site for recycling in a calendar year.		
Label containers in accumulation area with start date	0.00	0.00

Inventory logs must demonstrate that at least 75% by weight or volume of material being recycled is transferred to a different site for recycling in a calendar year.	0.00	0.00
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refrigeration mechanics and installers (49-9021) from the Bureau of Labor Statistics (<https://www.bls.gov/oes/current/oes499021.htm>).
-2111) from the Bureau of Labor Statistics (<https://www.bls.gov/oes/current/oes172111.htm>).
000) from the Bureau of Labor Statistics (<https://www.bls.gov/oes/current/oes110000.htm>).
ators (51-8091) from the Bureau of Labor Statistics (<https://www.bls.gov/oes/current/oes518091.htm>).
e (41-4012) from the Bureau of Labor Statistics (<http://www.bls.gov/oes/current/oes414012.htm>).
ers (11-3012) from the Bureau of Labor Statistics (<https://www.bls.gov/oes/current/oes113012.htm>).
eau of Labor Statistics (<https://www.bls.gov/oes/current/oes231011.htm>).
from the Bureau of Labor Statistics (<https://www.bls.gov/oes/current/oes439061.htm>).
from the Bureau of Labor Statistics (<https://www.bls.gov/oes/current/oes112021.htm>).
n the Bureau of Labor Statistics (<https://www.bls.gov/oes/current/oes271024.htm>).

151,805 Total ODS equipment, VM, 2026

1,307,585 Total HFC equipment, VM, 2026

10%	Proportion of ODS equipment, VM, 2026
90%	Proportion of HFC equipment, VM, 2026
15%	15-50 (plus school buses above 15 pounds) Affected Equipment relative to total HF
12%	50+ Affected Equipment relative to total HFC equipment, VM, 2026

Year 1	Year 2	Year 3		
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Number of Respondents	Number of Respondents	Number of Respondents	Number of Responses per Respondent	Burden Hours (Time) per Response
215	214	212	1.0	0.50
215	217	218	1.0	0.50
43	43	42	1.0	0.50
43	43	44	1.0	0.50
100	100	99	1.0	0.5
77	78	78	1.0	0.5
219	218	216	1.0	1.00
169	170	171	1.0	1.00
4	4	4	1.0	0.03
4	4	4	1.0	0.03
266,374	265,052	262,124	2.8	0.025
206,611	207,943	208,893	2.8	0.025

24,850	24,727	24,454	1.0	0.025
13,735	13,823	13,886	1.0	0.025
2,664	2,651	2,621	1.0	0.025
2,066	2,079	2,089	1.0	0.025
2,003	1,993	1,971	1.0	8.00
1,545	1,555	1,562	1.0	8.00
40	40	39	1.0	0.025

31	31	31	1.0	0.025
4	4	4	1.0	0.025
4	4	4	1.0	0.025
200,251	199,257	197,056	1.0	0.025
154,496	155,492	156,203	1.0	0.025
76,935	77,431	77,785	4.0	0.017
200,251	199,257	197,056	1.0	0.017
135,262	136,134	136,757	1.0	0.017
581	578	572	1.0	0.017
508	512	514	1.0	0.017
147	11,049	67	1.0	0.017
300,000	298,512	295,214	0.67	0.017
300,000	301,934	303,314	0.51	0.017
300,000	298,512	295,214	0.67	0.017
300,000	301,934	303,314	0.51	0.017
300,000	298,512	295,214	2.52	0.033
300,000	301,934	303,314	1.96	0.033

20	20	20	1	9.40
20	20	20	1	40
37	0	0	1	9.00
0	37	37	1	40.00
-	37	37	1	8
-	10,000	10,000	1	8

0	0	300,000	1.12	0.5
0	0	1611.00	209.22	0.017
3,089,523	3,112,151	3,392,081	260	137
9,593,756				
3,197,919				
773,004	781,563	777,899		

Unskilled and Loaded Hourly Wages		Burden Hours/Activity	AVOIDED Labor Costs/Activity	AVOIDED Capital Costs
Technical	Clerical			
\$80.81	\$40.87			
(3.35)	(1.65)	(5.00)	\$ (338.14)	\$ -
0.00	(0.50)	(0.50)	\$ (20.43)	\$ -
(7.50)	(2.50)	(10.00)	\$ (708.23)	\$ -
0.00	(1.00)	(1.00)	\$ (40.87)	\$ -
0.00	(0.50)	(0.50)	\$ (20.43)	\$ -
(5.00)	0.00	(5.00)	\$ (404.04)	\$ -
(3.35)	(1.65)	(5.00)	\$ (338.14)	\$ -
0.00	(0.50)	(0.50)	\$ (20.43)	\$ -
(7.50)	(2.50)	(10.00)	\$ (708.23)	\$ -

0.00	(1.00)	(1.00)	\$ (40.87)	\$ -
0.00	(0.50)	(0.50)	\$ (20.43)	\$ -
(5.00)	0.00	(5.00)	\$ (404.04)	\$ -
(0.22)	(1.50)	(1.72)	\$ (79.08)	\$ -
(0.90)	0.00	(2.18)	\$ (261.10)	\$ -
(0.90)	0.00	(1.00)	\$ (84.53)	\$ -
(0.50)	0.00	(0.50)	\$ (40.40)	\$ -
(0.50)	0.00	(0.50)	\$ (40.40)	\$ -
(0.10)	0.00	(0.10)	\$ (8.08)	\$ -
0.00	(0.10)	(0.10)	\$ (4.09)	\$ -
(0.22)	(1.50)	(1.72)	\$ (79.08)	\$ -
(0.90)	0.00	(2.18)	\$ (261.10)	\$ -
(0.90)	0.00	(1.00)	\$ (84.53)	\$ -
(0.50)	0.00	(0.50)	\$ (40.40)	\$ -
(0.50)	0.00	(0.50)	\$ (40.40)	\$ -
(0.10)	0.00	(0.10)	\$ (8.08)	\$ -
0.00	(0.10)	(0.10)	\$ (4.09)	\$ -
(0.50)	0.00	(0.50)	\$ (40.40)	\$ -
0.00	(0.10)	(0.10)	\$ (4.09)	\$ -
(0.50)	0.00	(0.50)	\$ (40.40)	\$ -
0.00	(0.10)	(0.10)	\$ (4.09)	\$ -
(0.25)	0.00	(0.25)	\$ (20.20)	\$ -

(0.25)	0.00	(0.25)	\$ (20.20)	\$ -
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s/current/oes499021.htm).

Assumed Entities (if needed)

65 Refrigerant reclai
484 Refrigerant whole
1,059 Refrigerant whole
2,905 Refrigerant whole
942 Disposal establis
641 Disposal establis

°C equipment, VM, 2026

	Year 1	Year 1	Year 1	Year 2
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Labor Cost per Response	Annual Burden Hours	Annual Labor Costs	Number of Annual Responses	Annual Burden Hours
\$52.34	107.7	\$11,271	215	107.1
\$52.34	107.7	\$11,271	215	108.4
\$52.34	21.53	\$2,254	43	21.43
\$52.34	21.5	\$2,254	43	21.7
\$52.34	50.1	\$5,241	100	49.8
\$52.34	38.6	\$4,043	77	38.9
\$104.69	219	\$22,926	219	218
\$104.69	169	\$17,688	169	170
\$2.62	0.094	\$10	4	0.093
\$2.62	0.094	\$10	4	0.094
\$2.62	18,927	\$1,981,325	757,062	18,833
\$2.62	14,680	\$1,536,802	587,210	14,775

\$2.62	621	\$65,036	24,850	618
\$2.62	343	\$35,945	13,735	346
\$2.62	67	\$6,971	2,664	66
\$2.62	52	\$5,407	2,066	52
\$837.48	16,020	\$1,677,059	2,003	15,941
\$837.48	12,360	\$1,293,875	1,545	12,439
\$2.62	1.00	\$105	40	1.00

\$2.62	0.77	\$81	31	0.78
\$2.62	0.09	\$10	4	0.09
\$2.62	0.09	\$10	4	0.09
\$2.62	5,006	\$524,081	200,251	4,981
\$2.62	3,862	\$404,336	154,496	3,887
\$1.74	5,129	\$536,930	307,741	5,162
\$1.74	3,338	\$349,387	200,251	3,321
\$1.74	2,254	\$235,999	135,262	2,269
\$1.74	10	\$1,014	581	10
\$1.74	8	\$887	508	9
\$1.74	2	\$257	147	184
\$0.96	3,338	\$193,092	200,251	3,321
\$0.96	2,575	\$148,973	154,496	2,592
\$0.96	3,338	\$193,092	200,251	3,321
\$0.96	2,575	\$148,973	154,496	2,592
\$1.93	25,235	\$1,459,993	757,062	25,110
\$1.93	19,574	\$1,132,434	587,210	19,700

\$984.04	188	\$19,681	20	188
\$4,187.40	800	\$83,748	20	800
\$1,159.03	333	\$42,884	37	-
\$1,634.64	-	\$0	-	1,480
\$646.46	-	\$0	-	296
\$530.21	-	\$0	-	80,000

\$28.93	-	\$0	-	-
\$1.79	-	\$0	-	-
	141,372	\$12,155,355	4,445,381	223,029
	\$ 19,201,737	4,790,212		

AVOIDED O&M Costs	Total Hours and Costs			
	Number of Respondents/Activity	Annual Burden Hours	Total Cost/Year	
\$ -	37.00	(185.00)	\$ (12,511)	Recordkeeping
\$ -	37.00	(18.50)	\$ (756)	Recordkeeping
\$ -	37.00	(370.00)	\$ (26,204)	Recordkeeping
\$ -	37.00	(37.00)	\$ (1,512)	Recordkeeping
\$ (4.87)	37.00	(18.50)	\$ (936)	Recordkeeping
\$ (0.10)	6.00	(30.00)	\$ (2,425)	Recordkeeping
\$ -	1611.00	(8055.00)	\$ (544,737)	Recordkeeping
\$ -	1611.00	(805.50)	\$ (32,918)	Recordkeeping
\$ -	1611.00	(16110.00)	\$ (1,140,950)	Recordkeeping

\$ -	1611.00	(1611.00)	\$ (65,835)	Recordkeeping
\$ (4.87)	1611.00	(805.50)	\$ (40,763)	Recordkeeping
\$ (0.10)	242.00	(1210.00)	\$ (97,802)	Recordkeeping
\$ -	1.00	(1.72)	\$ (79)	Recordkeeping
\$ -	1.00	(2.18)	\$ (261)	Recordkeeping
\$ (11.35)	1.00	(1.00)	\$ (96)	Third party report
\$ -	0.00	0.00	\$ -	Recordkeeping
\$ (5.29)	0.00	0.00	\$ -	Third party report
\$ -	0.00	0.00	\$ -	Recordkeeping
\$ -	0.00	0.00	\$ -	Recordkeeping
\$ -	48.00	(82.56)	\$ (3,796)	Recordkeeping
\$ -	48.00	(104.64)	\$ (12,533)	Recordkeeping
\$ (11.35)	48.00	(48.00)	\$ (4,602)	Third party report
\$ -	48.00	(24.00)	\$ (1,939)	Recordkeeping
\$ (5.29)	48.00	(24.00)	\$ (2,193)	Third party report
\$ -	48.00	(4.80)	\$ (388)	Recordkeeping
\$ -	48.00	(4.80)	\$ (196)	Recordkeeping
\$ -	37.00	(18.50)	\$ (1,495)	Recordkeeping
\$ -	37.00	(3.70)	\$ (151)	Recordkeeping
\$ -	1611.00	(805.50)	\$ (65,091)	Recordkeeping
\$ -	1611.00	(161.10)	\$ (6,584)	Recordkeeping
				Recordkeeping
				Recordkeeping
\$ -	1611.00	(402.75)	\$ (32,545)	Recordkeeping

\$ -	1611.00	(402.75)	\$ (32,545)	Recordkeeping
\$ (43.22)	15345	-31348	\$ (2,131,844)	

	NAICS Code
Facilities	562920
Wholesalers	423740
Wholesalers	423730
Wholesalers	424690
Facilities (Recyclers)	562920
Soldi Waste Landfill	562212

Year 2	Year 2	Year 3	Year 3	Year 3
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Annual Labor Costs	Number of Annual Responses	Annual Burden Hours	Annual Labor Costs	Number of Annual Responses
\$11,216	214	106.0	\$11,092	212
\$11,344	217	108.9	\$11,396	218
\$2,243	43	21.19	\$2,218	42
\$2,269	43	21.8	\$2,279	44
\$5,215	100	49.3	\$5,157	99
\$4,069	78	39.1	\$4,088	78
\$22,812	218	216	\$22,560	216
\$17,802	170	171	\$17,883	171
\$10	4	0.092	\$10	4
\$10	4	0.095	\$10	4
\$1,971,496	753,306	18,625	\$1,949,714	744,983
\$1,546,708	590,995	14,842	\$1,553,779	593,697

\$64,713	24,727	611	\$63,998	24,454
\$36,177	13,823	347	\$36,342	13,886
\$6,937	2,651	66	\$6,860	2,621
\$5,442	2,079	52	\$5,467	2,089
\$1,668,739	1,993	15,764	\$1,650,302	1,971
\$1,302,215	1,555	12,496	\$1,308,169	1,562
\$104	40	0.99	\$103	39

\$81	31	0.78	\$82	31
\$10	4	0.09	\$10	4
\$10	4	0.09	\$10	4
\$521,481	199,257	4,926	\$515,720	197,056
\$406,942	155,492	3,905	\$408,803	156,203
\$540,391	309,724	5,186	\$542,862	311,140
\$347,654	199,257	3,284	\$343,813	197,056
\$237,520	136,134	2,279	\$238,606	136,757
\$1,009	578	10	\$998	572
\$893	512	9	\$897	514
\$19,277	11,049	1	\$116	67
\$192,134	199,257	3,284	\$190,011	197,056
\$149,933	155,492	2,603	\$150,619	156,203
\$192,134	199,257	3,284	\$190,011	197,056
\$149,933	155,492	2,603	\$150,619	156,203
\$1,452,751	753,306	24,833	\$1,436,700	744,983
\$1,139,734	590,995	19,790	\$1,144,945	593,697

\$19,681	20	188	\$19,681	20
\$83,748	20	800	\$83,748	20
\$0	-	-	\$0	-
\$119,596	37	1,480	\$119,596	37
\$23,919	37	296	\$23,919	37
\$5,302,080	10,000	80,000	\$5,302,080	10,000

\$0	341,820	168,529	\$9,750,261	337,059
\$0	-	5,618	\$603,891	337,059
\$17,580,430	4,810,033	396,447	\$27,869,424	5,115,220
-	-	-	-	-

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This provision doesn't kick in until 2029

This provision doesn't kick in until 2029

Year	Total Responses	Total Hours
Year 1	4,460,726	110,024
Year 2	4,825,378	191,681
Year 3	5,130,565	365,099
Annual Average	4,805,557	222,268

Leak Repair Total
Fire Suppression
Cylinder Cert.
Reclaim Use

Labor Cost per Resp. per Year

Year 1

	Total/Yr All Respondents	Responses
\$52.34	Leak Repair/Inspection Reporting	1,090
\$52.34 Reporting	Leak Repair/Inspection Recordkeeping	2,390,449
\$52.34 Recordkeeping	Leak Repair/Inspection Third-party Reporting	2,053,765
\$52.34 Third-party Reporting	Fire Suppression Reporting	20
\$52.34 Reporting	Fire Suppression Recordkeeping	20
\$52.34 Recordkeeping	Cylinder Heel Recovery Certifications	-
\$104.69 Third-party Reporting	Cylinder Heel Recovery Certifications	-
\$104.69 Recordkeeping	Reclamation	-
\$2.62 Reporting	Reclamation	37
\$2.62 Third-party Reporting		
\$7.44 Recordkeeping	Reclamation	-
\$7.44	Total Reporting and Recordkeeping Recordkeeping	4,445,381

\$2.62

Reclaimer Reporting and Recordkeeping	15,345
Total with Avoided Costs	4,460,726

\$2.62

\$2.62

\$2.62

\$837.48

\$837.48

\$2.62

\$2.62

Total Annual Responses:

Year 1

\$2.62

\$2.62 Reporting

\$2.62 Recordkeeping

\$2.62 Third-party Reporting

\$6.98 Reporting

\$1.74 Recordkeeping

\$1.74 Third-party Reporting

\$1.74 Recordkeeping

\$1.74

\$1.74

\$0.64

\$0.50

\$0.64

\$0.50

\$4.87

\$3.77

Burden Per Response	Hours Per Response
Leak Repair/Inspection Reporting	0.67
Leak Repair/Inspection Recordkeeping	0.03
Leak Repair/Inspection Third-party Reporting	0.03
Fire Suppression Reporting	9.40
Fire Suppression Recordkeeping	40.00
Reclamation	9.00
Reclamation	0.00
Average for Reporting and Recordkeeping	0.03
Reclaimer Reporting and Recordkeeping	-2.04
Overall Average (including avoid	0.02

\$984.04

\$4,187.40

\$1,159.03

\$1,634.64

\$646.46

\$530.21

\$32.50

\$374.85

Total Costs
\$10,023,511.19
\$15,448,586.30
\$25,737,580.19
\$17,069,892.56

\$12,009,042

\$103,429

\$0

\$42,884

\$12,031,407

\$103,429

\$0

\$5,445,595

Year 1	Year 1	Year 2	Year 2	Year 2
Costs	Hours	Responses	Costs	Hours
\$76,968.62	735	1,090	\$76,989.06	735
\$8,655,516.90	82,682	2,403,210	\$8,677,799.31	82,894
\$3,276,556.96	56,634	2,053,799	\$3,276,618.23	56,635
\$19,680.78	188	20	\$19,680.78	188
\$83,748.00	800	20	\$83,748.00	800
\$0.00	-	341,820	\$0.00	-
\$0.00	-	-	\$0.00	-
\$0.00	-	10,037	\$5,325,999.17	80,296
\$42,884.02	333	-	\$0.00	-
\$0.00	-	37	\$119,595.84	1,480
\$12,155,355	141,372	4,810,033	\$17,580,430	223,029

\$ (2,131,844.09)	(31,348)	15,345	\$ (2,131,844.09)	(31,348)
\$10,023,511.19	110,024	4,825,378	\$15,448,586.30	191,681

Year 1	Year 2	Year 2	Year 3	Year 3
Cost Per Response (including non-labor)	Hours Per Response	Cost Per Response (including non-labor)	Hours Per Response	Cost Per Response (including non-labor)
\$70.64	0.67	\$70.63	0.67	\$70.62
\$3.62	0.03	\$3.61	0.03	\$3.62
\$1.60	0.03	\$1.60	0.03	\$1.60
\$984.04	9.40	\$984.04	9.40	\$984.04
\$4,187.40	40.00	\$4,187.40	40.00	\$4,187.40
\$1,159.03	0.00	\$0.00	0.00	\$0.00
\$0.00	40.00	\$3,232.32	40.00	\$3,232.32
2.73	0.05	3.65	0.08	5.45
-\$138.93	-2.04	-\$138.93	-2.04	-\$138.93
\$2.25	0.04	\$3.20	0.07	\$5.02

\$11,966,249
\$103,429
\$10,354,152
\$5,445,595

Year 3	Year 3	Year 3
Responses	Costs	Hours
1,086	\$76,692.89	733
2,384,705	\$8,626,651.33	82,406
2,045,198	\$3,262,904.42	56,398
20	\$19,680.78	188
20	\$83,748.00	800
337,059	\$9,750,260.92	168,529
337,059	\$603,890.93	5,618
10,037	\$5,325,999.17	80,296
-	\$0.00	-
37	\$119,595.84	1,480
5,115,220	\$27,869,424	396,447

Average Hours per Year

Average Cost per Year

Reporting Average Cost

Recordkeeping Average Cost

Reporting Average Hours

Recordkeeping Average Hours

Third party reporting hours

15,345	\$ (2,131,844.09)	(31,348)
5,130,565	\$25,737,580.19	365,099

Leak Repair/Inspecti Fire Suppressio Reclamation Cylinder Heels

83,395	988	54,628	58,049		
\$8,730,206.04	\$103,428.78	\$3,644,691.35	\$3,451,383.95		
\$76,883.52	\$19,680.78	\$3,550,666.11	\$0.00	\$3,647,230.42	
\$8,653,322.51	\$83,748.00	\$79,730.56	\$201,296.98	\$9,018,098.05	
				Total Hours	Average Hours (RCRA)
734	188	53,531	0	54,453	0
82,661	800	987	1,873	86,320	
56,556	0	111	56,176	112,843	

Average Hours (RCRA)	hours (RCRA)	reclaimer removed
		54,453
(31275.00)		55,045
	(73.00)	112,770
	TOTAL	222,268

Without Avoided Reclaimer Burden

Year	Total Responses	Total Hours	Total Labor Costs	Total O&M Costs
Year 1 (2026)	4,445,381	141,372	\$12,155,355.28	\$0.00
Year 2 (2027)	4,810,033	223,029	\$17,580,430.39	\$0.00
Year 3 (2028)	5,115,220	396,447	\$27,869,424.28	\$0.00
3yr ICR Annual Average	4,790,211	253,616	\$19,201,736.65	\$0.00

With Avoided Reclaimer Burden

Year	Total Responses	Total Hours	Total Labor Costs	Total O&M Costs
Year 1 (2026)	4,460,726	110,024	\$10,023,511.19	\$0.00
Year 2 (2027)	4,825,378	191,681	\$15,448,586.30	\$0.00
Year 3 (2028)	5,130,565	365,099	\$25,737,580.19	\$0.00
3yr ICR Annual Average	4,805,557	222,268	\$17,069,892.56	\$0.00

With Avoided Reclaimer Burden removed from average (for support

Year	Total Responses	Total Hours	Total Labor Costs	Total O&M Costs
Year 1 (2026)	4,445,381	141,372	\$12,155,355.28	\$0.00
Year 2 (2027)	4,810,033	223,029	\$17,580,430.39	\$0.00
Year 3 (2028)	5,115,220	396,447	\$27,869,424.28	\$0.00
3yr ICR Annual Average	4,790,211	253,616	\$19,201,736.65	\$0.00
Average Annual Avoided Reclaimer Burden and Costs	15,345	-31,348	-\$2,131,844.09	\$0.00
Incremental ICR Burden and Costs	4,805,556	222,268	\$17,069,892.56	\$0.00

During Review ***

Total Costs
\$12,155,355
\$17,580,430
\$27,869,424
\$19,201,737

Total Costs
\$10,023,511
\$15,448,586
\$25,737,580
\$17,069,893

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Total Costs
\$12,155,355.28
\$17,580,430.39
\$27,869,424.28
\$19,201,736.65
-\$2,131,844.09
\$17,069,892.56

Table V

Respondent Sector	Respondent Type	Activity	Affected Equipment	Number of Respondents per Year		
				Y1	Y2	Y3
		Prepare and submit requests for extensions to 30-day repair timeline	15-50 pounds	215	214	212
			>50 pounds	215	217	218
		Prepare and submit requests for extensions to 1 yr retrofit/retire timeline	15-50 pounds	43	43	42
			>50 pounds	43	43	44
		Prepare and submit request to cease a retrofit if all leaks are repaired	15-50 pounds	100	100	99
			>50 pounds	77	78	78
		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	219	218	216
			>50 pounds	169	170	171

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
		>50 pounds	4	4	4
	Maintain purchase and service records	15-50 pounds	266,374	265,052	262,124
		>50 pounds	206,611	207,943	208,893
	Maintain equipment installation records	15-50 pounds	24,850	24,727	24,454
		>50 pounds	13,735	13,823	13,886
	Maintain records during ownership change	15-50 pounds	2,664	2,651	2,621
		>50 pounds	2,066	2,079	2,089
	Maintain retrofit and/or retirement plans	15-50 pounds	2,003	1,993	1,971
		>50 pounds	1,545	1,555	1,562
	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	40	39
		>50 pounds	31	31	31

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
		>50 pounds	4	4	4
	Maintain reports on the results of verification tests any time leak rate threshold is exceeded	15-50 pounds	200,251	199,257	197,056
		>50 pounds	154,496	155,492	156,203
	Maintain quarterly leak inspection records	IPR and CR >500 pounds	76,935	77,431	77,785
	Maintain annual leak inspection records	15-50 pounds	200,251	199,257	197,056
		>50 pounds	135,262	136,134	136,757
	Maintain copies of any reports submitted to EPA under the proposed reporting requirements in this action	15-50 pounds	581	578	572
		>50 pounds	508	512	514

		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.	IPR and CR >1500 pounds with indirect ALD	147	11,049	67
HFC Equipment Technicians	Persons servicing HFC appliances provide leak inspection records to owners/operators	15-50 pounds	300,000	298,512	295,214	
		>50 pounds	300,000	301,934	303,314	
	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	298,512	295,214	
		>50 pounds	300,000	301,934	303,314	

		Persons servicing appliances w/charge sizes >15 lbs provide invoices to appliance owners/operators	15-50 pounds	300,000	298,512	295,214
			>50 pounds	300,000	301,934	303,314
Fire Suppression	OEMs, Servicers, & Recyclers	Annual report	HFC Fire Suppression	20	20	20
		Maintain records		20	20	20
Reclamation	HFC Reclaimers	One-time label redesign		37	-	-
		Maintain records		-	37	37
	HFC Reclaimers and Wholesalers	Two-time report	HFC Reclaimers	-	37	37
			HFC Wholesalers	-	10,000	10,000
Cylinder Heel Recovery	Refrigerant Technician	Certification statement of evacuated cylinder	Cylinders	-	-	300,000
	Final Processor	Maintain records	Cylinders	-	-	1,611

Total Hours per Year			Total Cost per Year		
Y1	Y2	Y3	Y1	Y2	Y3
107.7	107.1	106.0	\$11,271	\$11,216	\$11,092
107.7	108.4	108.9	\$11,271	\$11,344	\$11,396
21.5	21.4	21.2	\$2,254	\$2,243	\$2,218
21.5	21.7	21.8	\$2,254	\$2,269	\$2,279
50.1	49.8	49.3	\$5,241	\$5,215	\$5,157
38.6	38.9	39.1	\$4,043	\$4,069	\$4,088
219	218	216	\$22,926	\$22,812	\$22,560
169	170	171	\$17,688	\$17,802	\$17,883

0.09	0.09	0.09	\$10	\$10	\$10
0.09	0.09	0.09	\$10	\$10	\$10
18,927	18,833	18,625	\$1,981,325	\$1,971,496	\$1,949,714
14,680	14,775	14,842	\$1,536,802	\$1,546,708	\$1,553,779
621	618	611	\$65,036	\$64,713	\$63,998
343	346	347	\$35,945	\$36,177	\$36,342
67	66	66	\$6,971	\$6,937	\$6,860
52	52	52	\$5,407	\$5,442	\$5,467
16,020	15,941	15,764	\$1,677,059	\$1,668,739	\$1,650,302
12,360	12,439	12,496	\$1,293,875	\$1,302,215	\$1,308,169
1.00	1.00	0.99	\$105	\$104	\$103
0.77	0.78	0.78	\$81	\$81	\$82

0.09	0.09	0.09	\$10	\$10	\$10
0.09	0.09	0.09	\$10	\$10	\$10
5,006	4,981	4,926	\$524,081	\$521,481	\$515,720
3,862	3,887	3,905	\$404,336	\$406,942	\$408,803
5,129	5,162	5,186	\$536,930	\$540,391	\$542,862
3,338	3,321	3,284	\$349,387	\$347,654	\$343,813
2,254	2,269	2,279	\$235,999	\$237,520	\$238,606
9.7	9.6	9.5	\$1,014	\$1,009	\$998
8.5	8.5	8.6	\$887	\$893	\$897

2	184	1	\$257	\$19,277	\$116
3,338	3,321	3,284	\$193,092	\$192,134	\$190,011
2,575	2,592	2,603	\$148,973	\$149,933	\$150,619
3,338	3,321	3,284	\$193,092	\$192,134	\$190,011
2,575	2,592	2,603	\$148,973	\$149,933	\$150,619

25,235	25,110	24,833	\$1,459,993	\$1,452,751	\$1,436,700
19,574	19,700	19,790	\$1,132,434	\$1,139,734	\$1,144,945
188	188	188	\$19,681	\$19,681	\$19,681
800	800	800	\$83,748	\$83,748	\$83,748
333	-	-	\$42,884	\$0	\$0
-	1,480	1,480	\$0	\$119,596	\$119,596
-	296	296	\$0	\$23,919	\$23,919
-	80,000	80,000	\$0	\$5,302,080	\$5,302,080
-	-	168,529	\$0	\$0	\$9,750,261
-	-	5,618	\$0	\$0	\$603,891

Table VI - Respondent Burdent

Year	Total Responses	Total Hours	Total Labor Costs
Year 1	4,445,381	141,372	\$12,155,355
Year 2	4,810,033	223,029	\$17,580,430
Year 3	5,115,220	396,447	\$27,869,424
Annual Average	4,790,212	253,616	\$19,201,737
Avoided Reclaimer Burden	15,345	-31,348	-\$2,131,844
Incremental ICR Costs	4,805,557	222,268	\$17,069,893

Agency Burden

Year	Total Hours	Total Costs
Year 1	416	\$37,648
Year 2	5,435	\$491,494
Year 3	5,433	\$491,358
Annual Average	3,762	\$340,167
Average Avoided Reclaimer Burden and Costs	-98	-\$7,871
Annual Average with Avoided Burden and Costs	3,664	\$332,296

\$ 17,402,188

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

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

National Refrigerant Recycling and Emissions Reduction Program,

Annual Respondent Burden and Cost

Assumptions

	Median Wage (2022)
Refrigerant Recovery/Recycling Equipment Testing Organization	\$27.63
Refrigerant Reclaimers	\$49.79
Refrigerant Wholesalers	\$51.62
Technician Certification Programs	\$46.41
Disposal Establishments	\$65.26
Technicians	\$18.29
Owners/Operators	\$67.33
Small Can Manufacturers	\$27.88

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
	Submit annual activity report
Refrigerant Reclaimers	Provide certification when changing ownership or entering the market
	Maintain records of refrigerant sales transactions
	Maintain records that analysis conducted to verify that reclaimed refrigerant meets the necessary specifications
Refrigerant Wholesalers	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
	Acquire certification cards

Technicians	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
SUBTOTAL	

Total Number of Respondents
572,727

ted with leak repair and leak inspection under ER&R

iew ***

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

Total (+ Overhead)	
110%	
\$27.63	Mean hourly earnings for heating, air-conditioning, and refrigeration mechanic
\$49.79	Mean hourly earnings for health and safety engineers (17-2111) from the Bure
\$51.62	Median hourly earnings for management occupations (11-0000) from the Bure
\$46.41	Median hourly earnings for environmental engineers (17-2081) from the Burea
\$65.26	Median hourly earnings for lawyers (23-1011) from the Bureau of Labor Statist
\$18.29	Median hourly earnings for office clerks, general (43-9061) from the Bureau of
\$88.34	Median hourly earnings for marketing managers (11-2021) from the Bureau of
\$36.58	Median hourly earnings for graphic designers (27-1024) from the Bureau of Lab

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	\$221.04
2	1	0.50	0.5	\$13.82
2	1	0.50	0.5	\$13.82
2	1	0.50	0.5	\$13.82
56	1	9.37	9.4	\$466.49
2	1	5.00	5.0	\$248.95
56	50	0.23	11.7	\$580.88
56	260	0.02	4.3	\$215.76
10,000	260	0.03	8.7	\$447.37
3	1	5.00	5.0	\$232.05
74	2	0.08	0.2	\$7.74
74	2	1.00	2.0	\$92.82
1	1	8.00	8.0	\$371.28
74	1	5.00	5.0	\$232.05
7,500	260	0.06	15.2	\$989.78
30,000	1	0.02	0.02	\$0.30

300,000	1	0.02	0.02	\$0.30
300,000	2.2	0.03	0.1	\$1.35
300,000	2.0	0.03	0.1	\$1.20
300,000	0.55	0.02	0.0	\$0.17
300,000	12	0.02	0.2	\$3.66
25	1	0.50	0.5	\$44.17
5	1	0.50	0.5	\$44.17
5	1	0.50	0.5	\$44.17
125	1	1.00	1.0	\$88.34
255,083	1	0.05	0.1	\$4.42
255,083	6.25	0.02	0.1	\$9.21
255,083	6.25	0.03	0.2	\$13.81
166,175	2.73	0.02	0.05	\$4.03
166,175	1	0.03	0.03	\$2.21
2,745	1	8.00	8.0	\$706.70
137	1	0.03	0.03	\$2.21
4	1	0.03	0.03	\$2.21
12	12	0.03	0.3	\$10.97
572,727	varies	varies	varies	varies

Total Number of Annual Responses	Total Annual Hour Burden	Total Annual Labor Costs
13,698,513	425,514	\$25,708,019

0
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s and installers (49-9021) from the Bureau of Labor Statistics (htt

au of Labor Statistics (<https://www.bls.gov/oes/2022/may/oes17211>

au of Labor Statistics (<https://www.bls.gov/oes/2022/may/oes110000.htm>).

iu of Labor Statistics (<https://www.bls.gov/oes/2022/may/oes172081.htm>).

ics (<https://www.bls.gov/oes/2022/may/oes231011.htm>).

Labor Statistics (<https://www.bls.gov/oes/2022/may/oes439061.htm>).

Labor Statistics (<https://www.bls.gov/oes/2022/may/oes112021.htm>).

oor Statistics (<https://www.bls.gov/oes/2022/may/oes271024.htm>).

All Respondents			
Annual Burden Hours	Annual Labor Costs	Number of Annual Responses	
-	\$0	-	1
1	\$28	2	1
1.00	\$28	2	3
1.000	\$28	2	2
525	\$26,123	56	1
10	\$498	2	1
653	\$32,529	2,800	2
243	\$12,082	14,560	2
86,667	\$4,473,733	2,600,000	2
15	\$696	3	1
12	\$572	148	2
148	\$6,869	148	1
8	\$371	1	1
370	\$17,172	74	2
113,750	\$7,423,325	1,950,000	2
500	\$9,145	30,000	3

5,000	\$91,450	300,000	2
22,079	\$403,823	662,367	3
19,700	\$360,313	591,000	3
2,770	\$50,656	166,175	3
60,000	\$1,097,400	3,600,000	2
13	\$1,104	25	1
3	\$221	5	1
3	\$221	5	1
125	\$11,042	125	1
12,754	\$1,126,663	255,083	2
26,588	\$2,348,696	1,595,275	2
39,882	\$5,236,883	1,595,275	2
7,574	\$669,040	166,175	2
4,154	\$366,985	166,175	2
21,960.0	\$1,939,880	2,745	2
3	\$303	137	2
0.1	\$8	4	2
4	\$132	144	2
425,514	\$25,708,019	13,698,513	

Total/Yr All Respondents	Responses	Costs
Reporting	372.00	\$47,173.12
Recordkeeping	12,248,596.94	\$24,836,881.62
Third Party	1,449,543.99	\$823,964.38
Total	13,698,513	25,708,019

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Total Annual Responses: 13,698,513

Burden Per Response	Hours Per Response	Cost Per Response (including non-labor)
Reporting	2.28	\$126.81
Recordkeeping	0.03	\$2.03
Third Party	0.03	\$0.57
Average	0.03	\$1.88

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

Hours
849.17
379,615.17
45,049.48
425,513.83

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

Leak repair (15-point threshold) per individual AIC, AIC for 150+ pound CO and HFC equipment (see in 2020, 2021-2022 existing systems in 2023) (50/70 direct and indirect AIC)

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Annual Agency Burden and Cost

Assumptions

	Median Wage (2022)	Total (+ Overhead)
Overhead		1.50
Managerial Rate (GS 12 Step 5)	\$76.50	\$125.25 from 2024 OPM hourly base pay table for DC region: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/hrm/DOC_Lump
Technical Rate (GS 12 Step 5)	\$55.50	\$74.25 from 2024 OPM hourly base pay table for DC region: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/hrm/DC_Lump
Skilled Rate (GS 11 Step 5)	\$37.40	\$53.40 from 2024 OPM hourly base pay table for DC region: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/hrm/DOC_Lump
Unskilled Rate		\$12.25 from: Bureau average hourly rate for Senior Technical Analyst II and Consultant I under GS (current GS(030303) current period 5)

Agency Tally

Reviewing and Responding

Activity	Year 1		Year 2		Number of Responses per Respondent	Agency Hourly Rate Activity per Respondent and Loaded Hourly Wages				Year 1		Year 1		Year 2		Year 2		Year 3		Year 3	
	Year 1		Year 2			Total Annual Agency Hours				Total Annual Agency Hours		Total Annual Agency Hours		Total Annual Agency Hours		Total Annual Agency Hours		Total Annual Agency Hours			
	Number of Activities		Number of Activities			Number of Activities		Number of Activities		Number of Activities		Number of Activities		Number of Activities		Number of Activities		Number of Activities		Number of Activities	
	Number of Activities		Number of Activities			Number of Activities		Number of Activities		Number of Activities		Number of Activities		Number of Activities		Number of Activities		Number of Activities		Number of Activities	
Owners/operators of appliances with 15 or more pounds of HFC refrigerant prepare & submit reports for submission to the 30-day report deadline	431	431	431	431	-	0.25	-	-	-	308	59,737	431	108	49,794	431	337	69,712	431	431	431	
Owners/operators of appliances with 15 or more pounds of HFC refrigerant prepare & submit reports for submission to 1-year annual deadline	86	86	86	86	1	-	1	-	-	86	97,789	86	36	47,791	86	86	107,776	86	86	86	
Owners/operators of appliances with 15 or more pounds of HFC refrigerant prepare & submit reports for submission to 1-year annual deadline	177	177	177	177	1	-	0.08	-	-	15	63,337	177	35	63,337	177	15	63,337	177	15	63,337	
Owners/operators of appliances with 15 or more pounds of HFC refrigerant that took 125 percent or more of the full charge to schedule year to submit report on leak and freon/leak repair	388	388	388	388	1	-	0.50	-	-	194	127,542	388	194	127,542	388	193	127,488	388	193	127,488	
Owners/operators of appliances with 15 or more pounds of HFC refrigerant that took 125 percent or more of the full charge to schedule year to submit report on leak and freon/leak repair	7	8	8	7	1	-	0.50	-	-	4	6339	7	4	6339	8	4	6338	7	4	6338	
HFC fire suppression equipment CO2As/terminals/recylers prepare & submit annual reports	20	20	20	20	1	-	0.50	-	-	10	6904	20	10	6904	20	10	6904	20	10	6904	
Two-day reporting from manufacturers/State Builders/wholesalers who self-reclaimed HFCs to report on the date types and volumes of reclaimed HFC refrigerants sold for use in existing report of equipment to the covered subsector		10,037	10,037	1	-	0.50	-	-	-	48	5,051	10,037	10,037	10,037	5,051	10,037	10,037	10,037	10,037	10,037	
SUBTOTAL	6,168	11,547	11,548	7	-	3	-	-	-	466	127,648	1,180	5,436	149,696	11,147	5,430	149,638	11,147	5,430	149,638	

Requirement Type	Activity	AT/CDDO Hourly rate Activity per Respondent and Loaded Hourly Wages				Burden Hours/Activity	Labor Costs/Activity	Capital Costs	CDDO Costs	Total Hours and Costs		
		Total Annual Agency Hours								Number of Responses/Activity	Annual Burden Hours	Total Cost/Year
		Number of Activities										
		Number of Activities										
Emergency Procedures	Review submitted release report information	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	Review information into database/training all relevant	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	Review information to report the response activities	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
		-	-	-	-	-	-	-	-	-	-	

Year 1		Year 1		Year 2		Year 2		Year 3		Year 3	
Total FY All Respondents		Programs		Costs		Hours		Costs		Hours	
Leak Repair/Inspection Reporting		1,026		136,763.72		431		1,026		136,763.72	
Fire Suppression Reporting		20		49,791.32		86		20		49,791.32	
Freon/Leak Reporting		15		63,337.00		15		15		63,337.00	
Total		1,155		312,649.40		513		1,155		312,649.40	
Recalibration Reporting and Recalibration		147		127,870.19		106		147		127,870.19	
Total with Recalibration		1,302		440,519.59		619		1,302		440,519.59	

1,302,270.19

Respondents + EPA 1,302,270.19

7,947 332,296 2,684

Total Annual Responses		Year 1		Year 2		Year 3		Year 3	
Burden Per Response		Hours Per Response		Cost Per Response		Hours Per Response		Cost Per Response	
Leak Repair/Inspection Reporting		0.10		136,763.72		0.10		136,763.72	
Fire Suppression Reporting		0.10		49,791.32		0.10		49,791.32	
Freon/Leak Reporting		0.10		63,337.00		0.10		63,337.00	
Recalibration Reporting and Recalibration		0.10		127,870.19		0.10		127,870.19	
Total		0.40		312,649.40		0.40		312,649.40	

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	

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