

U.S. Environmental Protection Agency

Information Collection Request

Title: Servicing of Motor Vehicle Air Conditioners (Renewal)

OMB Control Number: 2060-0247

EPA ICR Number: 1617.11

Abstract: Section 609 of the Clean Air Act Amendments of 1990 (the Act or CAA) provides general guidelines for servicing of motor vehicle air conditioners (MVACs) and refrigerant handling. In 1992, EPA developed regulations under Section 609 that were published in 57 FR 31242 and codified at 40 CFR Subpart B (§ 82.30 et seq.). This supporting statement justifies an extension to collect the information required by the recordkeeping and reporting requirements mandated by Section 609 and delineated in 40 CFR 82, Subpart B. This ICR authorizes the collection of information from any establishment that may service or maintain motor vehicle air conditioners, as well as independent standards testing organizations and organizations with technician certification programs.

Section 609(b)(2)(A) of the Act requires:

- Refrigerant handling equipment certified by EPA or by an independent standards testing organization. Certification standards are particular to the type of equipment and the refrigerant to be recovered, and must be consistent with the SAE International, formerly the Society of Automotive Engineers (SAE), standards for MVAC equipment.
- Independent standards testing organizations certified by EPA. Independent laboratories must submit an application that documents: the organization's capacity to accurately test equipment compliance with applicable standards consistent with the SAE standards for handling refrigerant, an absence of conflict of interest or financial benefit based on test outcomes, and an agreement to allow EPA access to verify application information.

Section 609(b)(4) of the Act requires automotive technician training and certification in the proper use of approved refrigerant handling equipment. Programs that perform technician training and certification activities must apply to EPA for approval by submitting verification that its program meets EPA standards. Each approved technician certification program is required to conduct periodic reviews and updates of test material, submitting a written summary of the review and program changes to EPA for review and approval every two years (as per 40 CFR 82.40(c)).

Certification, reporting and recordkeeping. All required records must be retained on-site for a minimum of three years, unless otherwise indicated (40 CFR 82.42(b)).

Section 609(c) of the Act states that effective January 1, 1992, no person may service any motor vehicle air conditioner without being properly trained and certified, nor without using properly approved refrigerant handling equipment. The codified regulations at 40 CFR 82.42(a) states that no later than January 1, 1993, each service provider must have submitted to their EPA Regional office on a one-time basis a statement signed by the owner of the equipment or another responsible officer that provides the name of the equipment purchaser, the

address of the service establishment where the equipment will be located, the manufacturer name, equipment model number, date of manufacture, and equipment serial number. The statement must also indicate that the equipment will be properly used in servicing motor vehicle air conditioners and that each individual authorized by the purchaser to perform service is properly trained and certified. The information is used by EPA to assess compliance with Section 609 of the Act.

Any person who owns approved refrigerant handling equipment must maintain records of the name and address of any facility to which refrigerant is sent. Additionally, any person who owns approved refrigerant handling equipment must retain records demonstrating that all persons authorized to operate the equipment are currently certified technicians.

The sale or distribution of any class I or class II substance suitable for use in an MVAC that is in a container of less than 20 pounds may only be sold to technicians certified under Section 609(e), unless the purchase of small containers is for resale only. In that case, the seller must obtain a written statement from the purchaser that the containers are for resale only and must indicate the purchaser's name and business address. When a certified technician purchases small containers of refrigerant for servicing motor vehicles, the seller must have a reasonable basis for believing the accuracy of the information presented by the purchaser. In all cases, the seller must display a sign where sales occur that states the certification requirements for purchasers.

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.

The information requested for all entities that service MVACs is required by Section 609(d) of the Act and 40 CFR 82.36 and 82.42. This includes certification of both approved equipment and properly trained personnel. Section 609(b)(2)(A) and 40 CFR 82.38 require the approval of independent standards testing organization by EPA. Automotive air conditioning technician certification programs are referred to in Section 609(b)(4), and applicable requirements for program certification are detailed in 40 CFR 82.40. Reporting requirements associated with the sale of small containers for resale only are noted in Section 609(e) of the Act and 40 CFR 82.42(b)(3). The reporting requirements are derived from Section 114 of the Act.

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.

EPA headquarters and the ten EPA regional offices effectively manage and use the collected information. The information submitted by each service establishment is maintained by the EPA regional offices.

a. One-time Certification Statement

MVAC service establishments are required, by Section 609 of the Act to have purchased approved refrigerant handling equipment and to have only properly trained and certified personnel using the equipment by January 1, 1992. Since January 1, 1993, they must submit a certification statement to EPA certifying that the MVAC service establishment has acquired, and is properly using, approved equipment, and that each individual

authorized to use the equipment is properly trained and certified. Only new MVAC service establishments or establishments that have experienced a change in ownership are required to submit the one-time certification statement to EPA. Purchases of additional pieces of approved refrigerant handling equipment do not require the submission of additional certification statements.

b. Equipment Certification

As per 40 CFR 82.36(a)(1), the Agency is required either to certify refrigerant handling equipment itself or to approve independent laboratories to test and certify equipment. For EPA to certify equipment, the Agency must be provided with information that proves the equipment's ability to recover and/or recycle refrigerant according to the SAE J standards adopted into the appendices at 40 CFR Part 82, Subpart B. Certification standards are particular to the type of equipment used and refrigerant being recovered.

Since EPA does not have the capability to test all refrigerant handling equipment on a national scale, the Agency relies on approved laboratories to test equipment. Currently, Underwriters Laboratories (UL) and Intertek, (formerly ETL Testing Laboratories), certify equipment. The Agency established an approval system at 40 CFR 82.38 to evaluate procedures of laboratories that may request approval in the future. Information submitted by the laboratories must include documentation of their capacity to accurately test equipment, an absence of a conflict of interest or financial benefit based on test results, and agreement to allow EPA access to verify information. EPA uses the information provided by independent laboratories to evaluate their capacity to properly test refrigerant handling equipment. The Agency has required only the submission of information that will enable it to ensure that all approved laboratories can test equipment under Agency standards and the adopted SAE J standards. Given the nearly 30-year history of the program, EPA considers it unlikely that new organizations will submit for approval to become an approved laboratory.

c. Technician Certification Programs

Technicians must pass a test at the completion of a certification program to perform any service or repair on MVACs for consideration and to use the approved equipment as stipulated in Section 609 and 40 CFR 82.34, 82.40. Technician certification programs must submit verification to EPA of their compliance with standards set forth in 40 CFR 82.40. EPA uses certification program information to ensure that Agency standards are met, and that they are at least as stringent as the SAE J standards of SAE International. The information requested is used by EPA to guarantee a degree of uniformity in the testing programs for motor vehicle service technicians.

Because of the rapidly changing nature of the motor vehicle air conditioning market, EPA requires that technician certification programs conduct internal reviews and update their program periodically. By requiring a written summary of the review and any program changes to be reported to EPA every two years, the Agency ensures the accuracy of the information, and maintains parity among testing programs.

d. Refrigerant Sent Off-site

EPA requires service establishments to record the name and address of any off-site facility which is reclaiming refrigerant, per 40 CFR 82.42 (b)(1). This information is used to verify compliance with the motor vehicle air conditioning recycling program.

e. Purchases of Small Cans

Distributors who purchase small containers of refrigerant containing class I or class II refrigerants must be properly trained and certified according to the standards set forth in 40 CFR 82.40, unless the purchaser provides a written statement verifying that the small containers were purchased for resale only. The seller may

keep the initial statement from a distributor and update the file with the amounts of refrigerant purchased in the form of small containers. These records are used to ensure that small containers of refrigerant are not available for non-certified technicians. By requiring only minor additions to the existing invoice procedures, the Agency has ensured total compliance with Section 609.

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.

Independent standards testing organizations must submit to the Agency an application documenting their capacity to accurately test whether refrigerant handling equipment complies with the applicable standards, an absence of conflict of interest or financial benefit based on test results, and an agreement to allow EPA access to verify information. The Agency examines the submitted test procedures for their ability to meet the SAE standards as specified in Section 609 of the Act. These applications may be submitted manually or electronically, as long as they are made available for Agency review.

The substantially identical equipment approval process is no longer applicable for refrigerant handling equipment manufactured prior to the proposal of refrigerant equipment handling regulations. The substantially identical equipment regulation only relates to equipment initially purchased prior to March 6, 1996. Because the average lifetime of such equipment is roughly seven years, all such equipment is obsolete today. The documentation requirements for this approval process have been removed from this ICR.

Technician certification programs must submit to the Agency a verification of their compliance with EPA regulations for review and approval by EPA. Program materials include, but are not limited to: videos, scripts, manuals, booklets, presentations, and software or other forms of electronic information. Testing of technicians may be performed either manually or electronically. The certification programs and their tests are kept on file at EPA for reference.

The Agency has determined that periodic on-site inspection is the most effective method to ensure compliance with Section 609. Records should be kept at the location where service involving refrigerant is performed or where small containers of refrigerant are distributed for resale.

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 specific information requested by this notice is not currently collected by any other office within EPA or any other government agency.

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 Act does not require technician training and certification programs to be developed, only that once developed they be submitted to EPA. EPA expects around one technician certification program and no independent equipment standard testing organizations to apply for approval each year. The requirement to

submit the program application for Agency approval is not burdensome and is not expected to prevent small entities from developing programs.

The substantially identical determination provided a method for examining equipment sold before the regulations were proposed and that had not been certified by an approved independent laboratory. This provision would have benefited small entities that may have purchased recycling or recovered equipment in a good faith effort to recover refrigerant prior to the regulatory mandate.

The name and address of the refrigerant handling facility to which refrigerant is sent by an establishment with recovery-only capabilities is a standard part of existing recordkeeping procedures for business transactions. The regulations regarding records maintained by persons who sell small containers of refrigerant solely require that the resale-only statement be added into invoicing procedures for sales to uncertified purchasers.

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.

All entities operating at the time the regulations were introduced were required to submit certification forms to EPA by January 1, 1993. Today, only new shops or shops changing ownership are responsible for certification. The certification for refrigerant handling equipment is intended as a one-time information request per entity.

After the initial EPA approval, technician training programs must review their programs periodically to account for technological developments. A summary of the program review and any changes must be submitted to EPA every two years.

7. GENERAL GUIDELINES

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with PRA Guidelines at 5 CFR 1320.5(d)(2).

This ICR follows all of OMB's general guidelines for information collections.

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.

In compliance with the Paperwork Reduction Act of 1995, EPA issued a public notice in the Federal Register on May 22, 2024, soliciting public comments for a 60-day period. EPA received one public comment from the Mobile Air Climate Systems Association (MACS), which supported EPA's proposed extension of the ICR. EPA agrees with the commenter and is extending the information collection request to collect the information required by the recordkeeping and reporting requirements mandated by Section 609. EPA will issue a second notice in the Federal Register soliciting public comment for a 30-day period concurrent with the submission of this ICR renewal to OMB.

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.

In developing the regulations under the Act, EPA established an advisory council for issues relating to stratospheric ozone. The Stratospheric Ozone Protection Advisory Council (STOPAC) membership included representatives from affected industries, environmental interest groups, and academics in related fields. Within STOPAC, subcommittees were formed to look at the more detailed issues. The subcommittee on motor vehicle air conditioning met several times and discussed all aspects of the proposed regulations for Section 609 of the Act.

To update this ICR, prior to the publication of the second public notice in the Federal Register, EPA consulted with the following technician training and certification programs: MACS, Ferris State University, The Greater Cleveland Automobile Dealers' Association, National Fluid Poer Institute (NFPI), and ASE (National Institute for Automotive Service Excellence).

Respondents provided anecdotal information about technician certifications and records, noting that, based on historical figures, EPA's estimated number of newly certified technicians and records for newly certified technicians that would be maintained annually over the next three years in the U.S. were reasonable.

The comments received in response to the request for consultation are consistent with the proposal put forward in the May 22, 2024, Federal Register notice. Therefore, EPA has not changed the conclusions of this Supporting Statement.

9. PAYMENTS OR GIFTS TO RESPONDENTS

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

EPA does not provide payment or gifts to respondents for this ICR.

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.

This ICR does not request information of a confidential nature.

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.

No questions concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private are included in this information collection.

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 then 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.
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12a. Respondents/NAICS Codes

The following is a list of NAICS codes for organizations potentially affected by the information requirements covered under this ICR. It is meant to include any establishment that may service or maintain motor vehicle air conditioners, including:

- 4411: Automobile Dealers
- 4413: Automotive Parts, Accessories, and Tire Stores
- 44711: Gasoline Stations with Convenience Stores
- 8111: Automotive Repair and Maintenance
- 811198: All Other Automotive Repair and Maintenance

Other affected groups include:

- Independent Standards Testing Organizations
- Organizations with Technician Certification Programs

12b. Information Requested

All entities that service motor vehicle air conditioners must send to EPA, on a one-time basis, certification of ownership of an appropriate MVAC refrigerant handling device. This certification must include the name of the purchaser of the equipment, address of the establishment where the equipment will be located, name of equipment manufacturer, model number, date of manufacture, and serial number. The statement must be signed by the owner of the equipment or other responsible officer, and must indicate that the equipment will be properly used in servicing motor vehicle air conditioners, and that each individual authorized by the purchaser to perform service is properly trained and certified.

Independent laboratory testing of refrigerant handling equipment is designed to ensure that the equipment is capable of safely meeting the standards set forth by EPA in appendices to 40 CFR Part 82, Subpart B. To establish a degree of uniformity to the equipment certification programs, EPA requires organizations to submit applications documenting: the equipment used for equipment testing; the expertise and technical experience of their personnel; thorough knowledge of the standards in the appendices to 40 CFR Part 82, Subpart B; test procedures to be used and the rationale for them; absence of a conflict of interest or financial benefit based on test results; and agreement to allow EPA access to verify information. Specific reporting requirements may include: equipment ability to remove moisture, oil, and non-condensable gases from refrigerant, and a list of testing equipment used.

Technician certification programs interested in certifying technicians are required to document that their program meets EPA standards. An acceptable program includes the following components: adequate training

through on-the-job or on-site instructional training, or self-study; a test that effectively covers all relevant standards dealing with the servicing and repair of motor vehicle air conditioners, anticipated future technological developments, the regulatory requirements imposed by EPA under Section 609 of the Act, the environmental consequences of the release of refrigerant during the servicing and repair of motor vehicle air conditioners, and the adverse effects of stratospheric ozone depletion; a test grader who receives no benefit based on test results; means of identifying the individual taking the test; the measures taken at the test site to ensure that the tests are completed honestly by each technician; individual proof of certification in the form of a certificate or card and unique certification number.

Certification programs are required to conduct a periodic review of their test material and submit to EPA a written program review summary and any material changes every two years.

Service establishments that own approved refrigerant handling equipment and send used refrigerant off-site for recycling or reclamation must record the facility name and address to which any refrigerant is sent. In addition, the seller of small containers to an uncertified purchaser must be provided with a written statement that the containers are for resale only. The statement must also contain the purchaser's name and address. Finally, any person who owns equipment must retain records demonstrating that all technicians authorized to operate the equipment are certified pursuant to CAA. All these records must be kept on-site for a minimum of three years.

12c. Respondent Activities

All Entities That Service Motor Vehicle Air Conditioners

- One-Time Equipment and User Certification Forms:
 - Compile documentation for a certification that states the following: name of the purchaser of the equipment, address of the establishment where the equipment will be located, name of equipment manufacturer, model number, date of manufacture, and serial number. The statement must be signed by the owner of the equipment or other responsible officer, and indicate that the equipment will be properly used in servicing motor vehicle air conditioners and that each individual authorized by the purchaser to perform service is properly trained and certified. Prepare and submit completed certification to the appropriate EPA Regional Office.
- Records of Certified Technicians:
 - Maintain records on-site, for a minimum of three years, demonstrating that all equipment users are properly trained and certified.
- Records of Refrigerant Sent Off-site:
 - Record and file the facility address to which any refrigerant is sent for off-site reclamation or recycling. Recordkeeping is required for a minimum of three years.
- Records of Class I or Class II Refrigerant in Small Containers Sold for Re-Sale:
 - Verify that purchaser is properly trained and certified.
 - Compile, file, and keep for a minimum of three years written statements from uncertified purchasers verifying their intent to only resell the small containers of refrigerant.

Independent Standards Testing Organizations

- New Independent Standards Testing Organization Certification

- Research SAE J standards on MVAC refrigerant handling equipment.
- Compile test methodology, a list of required equipment, and other information regarding the SAE standards for the application to EPA.
- Prepare and submit application to EPA that documents capacity to accurately test whether refrigerant handling equipment complies with the applicable standards; an absence of conflict of interest or financial benefit based on test results; and an agreement to allow EPA access to verify information to ensure that the testing program fulfills the applicable SAE J standards, adopted in the appendices at 40 CFR Part 82, Subpart B, for recycling and recovery equipment.

Substantially Identical Equipment Owners or Manufacturers

- Locate information that will verify that the equipment can perform to the applicable SAE J standards, including process flow sheets and a list of components.
- Compile supporting information and submit it to EPA.

Technician Certification Programs

- New Technician Certification Program Certification:
 - Compile documents and submit to EPA for verification that training program meets EPA requirements.
- Technician Certification Program Review:
 - Conduct periodic program reviews.
 - Prepare and submit summary of program review to EPA every two years.

12d. Respondent Burden Hours and Labor Costs

Estimating Respondent Burden

The basis of the analysis is the identification of the principal steps involved in complying with EPA recordkeeping and reporting requirements and the estimated burden associated with each step. The burden was calculated by estimating the number of times the step may be required to be undertaken by the regulations and the number of hours required to complete each step. Table 1 presents the estimated annual respondent burden and costs for information collection activities associated with Section 609 of the Act.

Time required for completion of each activity is derived from the estimates in the previous ICR.

The maintenance of records of technician certification (of photocopying and filing the technician's certification card) is estimated to require 0.067 clerical work hours (4 minutes) per certification, which remains unchanged from the previous ICR.

One-time equipment and user certification for compilation, preparation, and submission is estimated to require 0.17 hours (10 minutes) per establishment, which remain unchanged from the previous ICR. Generally, this one-time certification is submitted by a new motor vehicle service facility, or by first-time refrigerant handling equipment owners or lessees, or when there has been a change in ownership of an existing service facility, consistent with the recordkeeping and reporting requirements in 40 CFR 82.42. This labor burden includes completion and mailing of a prepared certification statement. The statement requires information on establishment name, name of the equipment owner or lessee, address, and telephone number, as well as equipment manufacturer, model number, serial number, and year.

EPA has allotted 1.5 hours per establishment to conduct the biannual reviews, and 0.5 hours has been allotted per establishment to prepare and submit the summary, which are unchanged from the time allotted in the previous ICR.

Minimal records need to be developed by industry establishments, and these records can be stored as hard copies; there is no need or requirement for the creation (or maintenance) of a database system, though EPA recognizes that the movement toward electronic recordkeeping may be more efficient for certain establishments. Therefore, similarly to the previous ICR, no additional hours or costs are required for these activities.

Table 1: Industry Reporting Burden and Costs

INFORMATION COLLECTION ACTIVITY	Description	Number of Responses per Year	Labor Hours per Response				Total Hours per Year	Total Labor Costs per Response	Total Cost per Year
			Manager	Technicians/ Mechanics	Secretaries/ Assistants	Total			
			\$100.51	\$40.65	\$58.13				
ENTITIES THAT SERVICE MVACs									
One-Time Equipment and User Certification Statements	Compile, Prepare, and Submit Certification	1,000	-	-	0.17	0.17	170	\$9.88	\$9,882
Records of Technician Certification	Maintain Records On- Site of Certification of Technicians	47,000	-	-	0.067	0.067	3,149	\$3.89	\$183,051
Records of Refrigerant Sent Off-Site	Record and file off-site facility address	5,100	-	0.25	-	0.25	1,275	\$10.16	\$51,829
Records of CFC-12 Refrigerant Sold	Verify certification of purchaser		-	-	-	-	-	\$ -	\$ -
	Obtain and file written statements from purchaser verifying intent to only resell small containers	18	-	-	0.25	0.25	4.5	\$14.53	\$262
<i>Subtotal</i>		<i>53,118</i>	<i>-</i>	<i>0.25</i>	<i>0.49</i>	<i>0.74</i>	<i>4598.5</i>	<i>\$38.47</i>	<i>\$245,024</i>
INDEPENDENT STANDARDS TESTING ORGANIZATIONS									
New Independent Standards Testing Organization Certification	Research SAE standards on MVAC recovery equipment	-	-	-	-	-	-	\$ -	\$ -
	Compile information for application to EPA	-	-	-	-	-	-	\$ -	\$ -
	Prepare and submit	-	-	-	-	-	-	\$ -	\$ -

	application to EPA								
<i>Subtotal</i>		-	-	-	-	-	-	\$ -	\$ -
TECHNICIAN CERTIFICATION PROGRAMS									
New Technician Certification	Compile documents and submit to EPA for verification of program	1	-	-	40.00	40.00	40.00	\$2,325.20	\$2,325
Program Certification		-	-	-	-	-	-	\$ -	\$ -
Technician Certification Program Review	Conduct periodic program reviews	14	1.50	-	-	1.50	21.00	\$150.77	\$2,110.71
	Prepare and Submit summary of program review to EPA every two years	14	0.50	-	-	0.50	7.00	\$50.26	\$703.57
<i>Subtotal</i>		29	2.00	-	40.00	42.00	68.00	\$2,526	\$5,139.48
ANNUAL TOTAL		53,147	2.00	0.25	40.49	42.74	4666.5	\$2,565	\$250,163.29

Estimating Respondent Costs

EPA has consulted the original ICR to obtain the appropriate baseline labor rates for each labor category. Wage rates reflect the total cost to employ an individual and include estimates of salaries and overhead costs. Wage data for each labor category (e.g., managerial, technical, and clerical labor) are taken from the U.S. Bureau of Labor Statistics (BLS) Occupational Employment and Wage Statistics (OEWS) program, while fringe data are taken from the Employer Costs for Employee Compensation (ECEC) Supplementary Tables ([BLS 2023c](#)). Wages are represented by the “mean hourly wage” estimate in OEWS and fringe benefits are represented by the quotient of “total benefits” and “wages and salaries” estimates in ECEC, multiplied by the OEWS wage estimate.

Overhead costs are assumed to equal 20 percent of the sum of wages plus fringe benefits. This loading factor is described in Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and Other U.S. EPA Actions ([EPA 2020](#)) and is reflective of multiplier values used in prior EPA regulatory impact analyses (RIAs) and ICRs that are based on industry- and occupation-specific overhead rates affected by EPA regulations. This overhead loading factor is multiplied by the total compensation (wages plus fringe benefits). For example, the 2022 fully loaded wage for technical labor is $(\$23.89 + \$9.99) * 1.2 = \$40.65$. Fully loaded costs for managerial and clerical labor are calculated in a similar manner. The calculated overhead costs (20% of the total compensation) are shown in Table2 as well as the total hourly loaded wages.

Table 2: Industry Wage Rates (2022\$)

Labor Category	Data Series	Date	Wage	Fringe Benefit ^a	Total Compensation	Overhead % of Total Compensation	Overhead	Hourly Loaded Wages ^b
			(a)	(b)	(c) =(b)/(a)	(d)	(e)=(c) *(d)	(f)=(c)+(e)
Manager	Wage: BLS OEWS General and Operations Managers (11-1021) Fringes as percent of wage: BLS ECEC, "Private Industry Workers"	May-22	\$59.07	\$24.69	\$83.76	20%	\$16.75	\$100.51
Technical	Wage: BLS OEWS Automotive Service Technicians (49-3023) Fringes as percent of wage: BLS ECEC, "Private Industry Workers"	May-22	\$23.89	\$9.99	\$33.88	20%	\$6.78	\$40.65
Cleric	Wage: BLS OEWS Executive Secretaries and Administrative Assistants (43-6011) Fringes as percent of wage: BLS ECEC, "Private Industry Workers"	May-22	\$34.16	\$14.28	\$48.44	20%	\$9.69	\$58.13

^a An overhead rate of 20% is used based on assumptions in Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and Other U.S. EPA Actions (EPA 2020)

^b Wage data are rounded to the closest cent in this analysis.

Estimating the Respondent Universe and Total Burden and Costs

According to data from the U.S. Census Bureau, there were 165,042 establishments in the “Automotive Repair and Maintenance” sector in 2021 (U.S. Census 2023).¹ According to data from BLS (2023a; 2023b), there were 246,891 private establishments in the “Repair and Maintenance” sector and 124,199 in the “Motor Vehicle Repairs and Parts Dealer” sector in the second quarter of 2023. These numbers represent an approximate three percent increase in the number of establishments in those sectors relative to 2021 (BLS 2021a; 2021b). As such, the Agency assumes that the number of motor vehicle repair establishments (which are a subset of the two larger sectors) increased by three percent since 2021, for a total of approximately 170,000 establishments. Based on data from BLS from 2020, the number of motor vehicle repair establishments has increased by six percent since the previous ICR.

An average of 1,000 equipment certification submissions are received and processed by EPA Regional offices each year. Therefore, it is estimated that 1,000 establishments will compile and submit one-time certification submissions to EPA on an annual basis, which remains unchanged from the previous ICR.

The 2021 ICR estimated that approximately 40,000 new technicians may be certified each year. EPA estimates in this ICR, based on the average of the five previous ICR estimates of the number of new technicians, that approximately 47,000 new technicians may be certified each year. Assuming that MVAC service establishments will hire these newly certified technicians and maintain records demonstrating their certification, this ICR estimates there will be 47,000 records regarding certified technicians using proper refrigerant handling equipment maintained each year.

In the previous ICR, EPA estimated that three percent of servicing establishments send refrigerant off-site for reclamation, and the Agency is retaining this assumption. Based on the estimated total number of currently operating servicing establishments in the United States (170,000), 5,100 facilities are estimated to keep record and file off-site facility address of refrigerant sent for reclamation in this ICR.

EPA estimates that there are 18 annual purchases of small class I or class II refrigerant containers made by uncertified purchasers for resale only. This number is reduced from the estimate of 35 purchases in the most recent ICR renewal, because EPA estimates that there has been at least a 50% reduction in the CFC-12 vehicle fleet since 2021.

There are currently two independent standards testing organizations, and it is unlikely that any others will apply for approval. Additionally, no significantly identical equipment is expected to be submitted to the Agency for review.

There are currently 27 technician certification programs that must submit program reviews every other year. It is estimated that EPA will review one new program per year and eleven program updates per year (i.e., one update for each program every other year).

¹ Based on NAICS code 8111 “Automotive Repair and Maintenance

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.

The Agency estimates that there are no capital/operations and maintenance costs associated with the requirements of Section 609, and therefore, with the renewal of this information collection request.

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

The basis of this analysis is the identification of the steps involved in implementing and operating the system. The costs associated with each step have been estimated by identifying the number of times the step will be undertaken, the number of hours required to complete each step, and the total dollar cost. The estimated Agency burden hours and costs associated with the information collection activities for this ICR are presented below. Agency labor costs are based on the January 2022 GS Salary Schedule for the locality pay area of Washington-Baltimore- Northern Virginia, DC-MD-PA-WV (OPM 2021).

63.9% of the wage is used to calculate the fringe in the derivation of Agency wage rates. An additional loading factor of 20 percent is applied to wages to account for overhead, consistent with the approach described above for Industry wage rates. Government Manager and Clerical wages are presented in Table 3.

Estimates of burden hours are based on assumptions that filing and recording information will take very little time. Specific estimates are detailed in Error: Reference source not found⁴. No additional hours or costs will be incurred for preparation or development of a recordkeeping database. For the establishment activities that simply require on-site recordkeeping and for those that are currently not applicable to any establishments, EPA has no correlated burden.

14b. Agency Labor Cost

Table 3: Government Wage Rates

Labor Category	Data Source for Wage Information	Wage (\$/hour)	Fringes as % wage ^b	Fringe Benefit	Total Compensation	Overhead as % total compensation ^c	Overhead	Loaded Wage (\$/hr)
		(a)	(b)	(c) = (a)*(b)	(d) = (a)+(c)	(e)	(f) = (d)*(e)	(g) = (d)+(f)
Manager	Annual federal staff cost: OPM Washington-Baltimore-Northern Virginia, DC-MD-PA-VA-WV area, GS-12 Step 2 pay rates ^a	\$44.48	63.9%	\$28.42	\$72.90	20%	\$14.58	\$87.48
Cleric	Annual federal staff cost: OPM Washington-Baltimore-Northern Virginia, DC-MD-PA-VA-WV area, GS-7 Step 2 pay rates ^a	\$25.07	63.9%	\$16.02	\$41.09	20%	\$8.22	\$49.31

^a Source: U.S. Office of Personnel Management. (2022).

^b Source: Falk, J. 2012.

^c An overhead rate of 20% is used based on assumptions in Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and Other U.S. EPA Actions (EPA 2020).

Table 4: Agency Reporting Burden and Costs

INFORMATION COLLECTION ACTIVITY	Description	Number of Responses per Year	Labor Hours per Response			Total Hours/Year	Costs per Response	Total Cost per Year
			Manager	Clerical	Total			
			\$87.48	\$49.31				
One-Time Equipment and User Certification Statements	Review and file applications	1,000	-	0.08	0.08	80.00	\$3.94	\$3,945
New Independent Standards Testing Organization Certification	Review applications from testing organizations who request to certify equipment	-	-	-	-	-	\$ -	\$ -
New Technician Certification Program Certification	Review applications from new technician certification programs	1.00	10.00	-	10.00	10.00	\$874.80	\$875
Technician Certification Program Review	Review summaries of certification program updates every two years	14	0.25	-	0.25	3.25	\$21.87	\$306
Annual Total		1,015	10.25	0.08	10.33	93.25	\$901	\$5,126

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.

The previously approved ICR's supporting statement estimated a total annual respondent burden of 4,165.25 hours. This ICR estimates a total annual respondent burden of 4,666.5 hours. Hence, there is an increase of 501.25 hours since the previously approved ICR. This change can be attributed to the following factors.

- Since the previous ICR renewal, EPA estimates that the total number of establishments has increased from 165,800 to 170,000, based on recently released data on the number of motor vehicle establishments from the U.S. Census Bureau.
- As in the previous ICR renewal, EPA assumed that three percent of establishments send refrigerants off-site and need to record the address of the off-site facility. The estimate for the number of establishments that send refrigerants off-site increased from 4,974 to 5,100 to reflect a higher, more accurate, number of motor vehicle establishments in the United States.
- In the previous ICR, EPA estimated that there would be 40,000 new MVAC technicians. In this ICR, EPA increased this estimate to 47,000.
- EPA estimates that there are 18 annual purchases of small class I or class II refrigerant containers made by uncertified purchasers for resale only. This number is reduced from the estimate of 35 purchases in the 2021 ICR renewal because EPA estimates that there has been at least a 50% reduction in the CFC-12 vehicle fleet since the previous ICR was published.
- The number of technician certification programs, which are required to conduct biannual program reviews and submit documentation to EPA, increased from 22 to 28 since the previous ICR (EPA 2021).

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.

Information collected for this ICR will not be published.

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.

EPA is not seeking approval to not display the expiration date for OMB approval of the information collection.

18) CERTIFICATION STATEMENT

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

EPA does not request an exception to the certification of this information collection.

References

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<https://www.census.gov/content/census/en/data/tables/2021/econ/susb/2021-susb-annual.html>
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- U.S. Environmental Protection Agency (EPA). 2021. Section 609 Technician Training and Certification Programs. Last updated March 23, 2021. <https://www.epa.gov/mvac/section-609-technician-training-and-certification-programs>
- U.S. Office of Personnel Management (OPM). 2022. Salary Table 2022-DCB for the Locality Pay Area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA. Effective January 2022.
<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB.pdf>.

