

Quarterly Reports	Number of unique facilities/companies
Producer	10
Imports	75
Exports	26
Exports (non-Importers)	4
Reclamation	31
Fire Suppression	4

Biannual Reports	Number of unique facilities/companies
App-specific Allowance Holder	54

One-Time Reports	Number of unique facilities/companies
Destruction	10
Transformation	3
Process Agent	4
Production	7
Reclamation	

As Needed Reports	Number of unique facilities/companies	Number of Reports
Transfers	11	34
Conferrals (Suppliers)	3	8
Conferrals (App-specific Allowance	25	93
RACA	16	249
Petitions	2	63
Transshipments	1	2

Source: HFC Submission Summary Report (2.14.23)

Months of Activity	Average Reports/Company/Year
12	3
12	3
13	3
12	16
9	42
12	2

Respondent Burden Assumptions

Respondent Type	Activity	Technical Hours per Response
HFC Producer	Submit one-time producer report	100
	Submit quarterly report	6
	Submit annual inventory report (part of quarterly report)	20
	Maintain records	0
	Submit annual HFC-23 emissions report	12
	Submit HFC-23 proof of destruction	0.25
	Provide certification to third party (conferrer)	2
	Submit quarterly production for export report	3
	Submit annual production for export certification	2
HFC Importer	Submit quarterly report	6
	Submit annual inventory report	10
	Maintain records	0
	Petition to import HFCs for transformation/destruction	2
	Petition to import used HFCs for destruction	6
	Submit ACE report	0.25000
	Submit proof of destruction of used imports	0.25
	Maintain records on used imports for destruction	0
	Provide certification to third party (conferrer)	2
	Submit Importer of Record annual report	2
	Submit notification of transshipments	1
	Maintain records on HFCs purchased at government auction	0
HFC Aggregator	Maintain records	0
Vessel Owner	Maintain records	0
HFC Exporter	Submit quarterly report	6
	Submit annual inventory report	10
	Maintain records	0
	Submit request for additional consumption allowances	6
	Submit notification of transshipments	1
HFC Suppliers	Submit conferral request	6
	Provide certification to third party (conferee)	2.00
	Provide certification to third party (conferrer)	2
	Maintain records	0
HFC Destroyer	Submit one-time report	100
	Submit annual second party report	4
	Maintain records	0
	Provide destruction verification to third party	2
	Provide proof of destruction to third party	2
HFC Transformer	Submit one-time report	100
	Submit annual second party report	4

HFC Transformers	Maintain records	0
	Provide transformation verification to third party	2
HFC Process Agent Use	Submit one-time report	100
	Submit annual report	6
HFC Reclaimers	Submit one-time report	40
	Submit quarterly report	9.4
	Submit annual inventory report	10
	Maintain records	0
HFC Fillers and Packagers	Maintain records	0
HFC Fire Suppression Agent Recyclers	Submit quarterly report	9.4
	Submit annual inventory report	10.0
	Maintain records	0
HFC Transfers	Submit inter-company transfer request	6
	Submit request to transfer from a person in a foreign country	6
	Submit request to transfer to a person in a foreign country	6
	Submit request to sell/transfer HFCs produced/imported with application-specific allowances	6
Application-Specific Allowance Holders	Submit biannual report	6
	Submit annual report (part of biannual report)	6
	Submit conferral request	6
	Provide certification to third party (conferee)	2
	Maintain records	0
	Submit mid-year request for additional consumption allowances in the event of a public health emergency (MDIs)	6
Potential Application-Specific Allowance Holders	Submit new application petition	90
Third Party Audits	Submit annual audit report	40
Unique number of Respondents		



Clerical Hours per Response	Responses per Year	Maximum Respondents per Acitivity
0	1	1.00
0	4	10.00
0	1	10.00
100	1	10.00
0	1	4.00
0	2	4.00
0	1	1.00
0	4	1
0	1	1
0	4	75.00
0	1	75.00
100	1	75.00
0	42	2.00
0	5	2.00
0	100	75.00
0	5	2.00
20	1	2.00
0	1	2.00
0	1	75.00
0	4	1.00
1	1	10.00
20	1	5.00
20	1	100.00
0	4	26.00
0	1	26.00
20	1	4.00
0	16	16.00
0	4	1.00
0	3	3.00
0	3	3.00
0	4	3.00
20	1	3.00
0	1	1.00
0	1	10.00
20	1	10.00
0	1	10.00
0	1	10.00
0	1	1.00
0	1	3.00

20	1	3.00
0	1	3.00
0	1	1.00
0	1	4.00
0	1	0.00
0	4	31.00
0	1	31.00
60	1	31.00
20	1	50.00
0	4	4.00
0	1	4.00
40	1	4.00
0	3	11.00
0	1	1.00
0	1	1.00
0	1	5.00
0	2	46.00
0	1	54.00
0	2	46.00
0	2	46.00
80	1	46.00
0	1	8.00
0	0.20	5.00
0	1	162.00
		342

Basis for Assumptions
Assumes up to one response per year to account for revisions or new production facilities.
Number of facilities based on HFC 2022 report submissions
Number of facilities based on HFC 2022 report submissions
Number of facilities based on HFC 2022 report submissions
Burden estimate for reporting to eGGRT under subpart O from GHGRP ICR 2019 renewal; Respdnts based on eGGRT subpart O reporting
Based on second party transformation and destruction verification assumption
Provided by EPA
Provided by EPA
Number of companies based on HFC 2022 report submissions
Number of companies based on HFC 2022 report submissions
Number of companies based on HFC 2022 report submissions
Activity based on HFC 2022 report submissions from mid-March
Activity based on 2022 DPETI submissions
7500 unique shipments based on historical ACE data; Number of companies based on HFC 2022 report submissions
Based on second party transformation and destruction verification assumption
Number of companies based on HFC 2022 report submissions
Based on 2022 HSHIP submissions
Provided by EPA
Provided by EPA
Provided by EPA
Number of companies based on HFC 2022 report submissions
Number of companies based on HFC 2022 report submissions
Number of companies based on HFC 2022 report submissions; reflects companies that only export (i.e., non-importers)
Activity based on 2022 HRACA submissions
Based on 2022 HSHIP submissions
Based on 2022 HCONF submissions
Based on 2022 HCONF submissions
Based on 2022 HCONF submissions
Based on 2022 HCONF submissions
Assumes up to one response per year to account for revisions or new destruction facilities.
Number of facilities based on HFC 2022 one-time report submissions
Number of facilities based on HFC 2022 one-time report submissions
Number of facilities based on HFC 2022 one-time report submissions
Number of petitions to import HFCs for destruction
Assumes up to one response per year to account for revisions or new transformation facilities.
Number of facilities based on HFC 2022 one-time report submissions

Number of facilities based on HFC 2022 one-time report submissions
Number of facilities based on HFC 2022 one-time report submissions
Assumes up to one response per year to account for revisions or new process agent end-users
Number of facilities based on HFC 2022 one-time report submissions
Assumes up to one response per year to account for revisions.
Burden for annual activity report from Section 608 ICR, number of companies based on HFC 2022 report submissions
Number of companies based on HFC 2022 report submissions
Number of companies based on HFC 2022 report submissions
Burden for annual activity report from Section 608 ICR, number of respondents based on HFC 2022 report submissions
Number of respondents based on HFC 2022 report submissions
Number of respondents based on HFC 2022 report submissions
Activity based on 2022 HTRAN submissions
ICF estimate
ICF estimate
ICF estimate
Based on 2023 allowance recipients
Based on 2023 allowance recipients plus 8 to account for new applicants
Based on application-specific allowance holders minus companies with consumption allowances; based on HCONF submissions
Based on 2023 allowance recipients
Based on 2024 MDI allowance recipients
Provided by EPA (assume 1 petition during 5-year rule period)
Importers + producers + reclaimers + application specific allowance holders
aggregators + producers + importers + suppliers + reclaimers+ destroyers + transformers + fillers/packagegers + vessel owners + application-specific allowan
holders + potential application-specific allowance holders (assumes other respondents overlap with these activities)



Respondents per Year

Respondent Type
HFC Producer
HFC Importer
HFC Aggregator
Vessel Owner
HFC Exporter
HFC Supplies
HFC Destroyer
HFC Transformer

HFC Transfomers
HFC Process Agent Use
HFC Reclaimers
HFC Fillers and Packagers
HFC Fire Suppression Agent Recyclers
HFC Transfers
Application-Specific Allowance Holders
Entities Petitioning for New Application
Third Party Audits

Acitvity	Y1 (2026)	Y2 (2027)
Submit one-time producer report	1	1
Submit quarterly report	10	10
Submit annual inventory report (part of quarterly report)	10	10
Maintain records	10	10
Submit annual HFC-23 emissions report	4	4
Submit HFC-23 proof of destruction	4	4
Provide certification to third party (conferrer)	1	1
Submit quarterly production for export report	1	1
Submit annual production for export certification	1	1
Submit quarterly report	75	75
Submit annual inventory report	75	75
Maintain records	75	75
Petition to import HFCs for transformation/destruction	2	2
Petition to import used HFCs for destruction	2	2
Submit ACE report	75	75
Submit proof of destruction of used imports	2	2
Maintain records on used imports for destruction	2	2
Provide certification to third party (conferrer)	2	2
Submit Importer of Record annual report	75	75
Submit notification of transshipments	1	1
Maintain records on HFCs purchased at government auction	10	10
Maintain records	5	5
Maintain records	100	100
Submit quarterly report	26	26
Submit annual inventory report	26	26
Maintain records	4	4
Submit request for additional consumption allowances	16	16
Submit notification of transshipments	1	1
Submit conferral request	3	3
Provide certification to third party (conferee)	3	3
Provide certification to third party (conferrer)	3	3
Maintain records	3	3
Submit one-time report	1	1
Submit annual second party report	10	10
Maintain records	10	10
Provide destruction verification to third party	10	10
Provide proof of destruction to third party	10	10
Submit one-time report	1	1
Submit annual second party report	3	3

Maintain records	3	3
Provide transformation verification to third party	3	3
Submit one-time report	1	1
Submit annual report	4	4
Submit one-time report	0	0
Submit quarterly report	31	31
Submit annual inventory report	31	31
Maintain records	31	31
Maintain records	50	50
Submit quarterly report	4	4
Submit annual inventory report	4	4
Maintain records	4	4
Submit inter-company transfer request	11	11
Submit request to transfer from a person in a foreign country	1	1
Submit request to transfer to a person in a foreign country	1	1
Submit request to sell/transfer HFCs produced/imported with application-specific allowances	5	5
Submit biannual report	46	46
Submit annual report (part of biannual report)	54	54
Submit conferral request	46	46
Provide certification to third party (conferee)	46	46
Maintain records	46	46
Submit mid-year request for additional consumption allowances in the event of a public health emergency (MDIs)	8	8
Submit new application petition	5	5
Submit annual audit report	162	162



Y3 (2028)
1
10
10
10
4
4
1
1
1
75
75
75
2
2
75
2
2
2
2
75
1
10
5
100
26
26
4
16
1
3
3
3
3
3
1
10
10
10
10
1
3

Audit Costs

Auditor Labor Rate (\$)	Auditor Time (hours)	Total Cost to Respondent (\$)
\$80.66	80	\$ 6,452.80

ACE Report Burden

Respondent
Importer

3
3
1
4
0
31
31
31
50
4
4
4
11
1
1
5
46
54
46
46
46
8
5
162



en Assumptions

Total Annual Shipments	Total Respondents	Responses/Respondent	Time per Response	Unit of Response Time	Time per Response (hours)
7,500	75	100	15	Minutes	0.3

Respondent Burden

Respondent Type	Activity	Responses per Respondent per Year
HFC Producer	Submit one-time producer report	1
	Submit quarterly report	4
	Submit annual inventory report (part of quarterly report)	1
	Maintain records	1
	Submit annual HFC-23 emissions report	1
	Submit HFC-23 proof of destruction	2
	Provide certification to third party (conferrer)	1
	Submit quarterly production for export report	4
	Submit annual production for export certification	1
HFC Importer	Submit quarterly report	4
	Submit annual inventory report	1
	Maintain records	1
	Petition to import HFCs for transformation/destruction	42
	Petition to import used HFCs for destruction	5
	Submit ACE report	100
	Submit proof of destruction of used imports	5
	Maintain records on used imports for destruction	1
	Provide certification to third party (conferrer)	1
	Submit Importer of Record annual report	1
	Submit notification of transshipments	4
	Maintain records on HFCs purchased at government auction	1
HFC Aggregator	Maintain records	1
Vessel Owner	Maintain records	1
HFC Exporter	Submit quarterly report	4
	Submit annual inventory report	1
	Maintain records	1
	Submit request for additional consumption allowances	16
	Submit notification of transshipments	4
HFC Suppliers	Submit conferral request	3
	Provide certification to third party (conferee)	3
	Provide certification to third party (conferrer)	4
	Maintain records	1
HFC Destroyer	Submit one-time report	1
	Submit annual second party report	1
	Maintain records	1
	Provide destruction verification to third party	1
	Provide proof of destruction to third party	1
	Submit one-time report	1

1	HFC Transformer	Submit annual second party report	1
		Maintain records	1
		Provide transformation verification to third party	1
1	HFC Process Agent Use	Submit one-time report	1
1		Submit annual report	1
1	HFC Reclaimers	Submit one-time report	1
1		Submit quarterly report	4
		Submit annual inventory report	1
		Maintain records	1
	HFC Fillers and Packagers	Maintain records	1
1	HFC Fire Suppression Agent Recyclers	Submit quarterly report	4
		Submit annual inventory report	1
		Maintain records	1
	HFC Transfers	Submit inter-company transfer request	3
		Submit request to transfer from a person in a foreign country	1
		Submit request to transfer to a person in a foreign country	1
		Submit request to sell/transfer HFCs produced/imported with application-specific allowances	1
1	Application-Specific Allowance Holders	Submit biannual report	2
		Submit annual report (part of biannual report)	1
1		Submit conferral request	2
		Provide certification to third party (conferee)	2
		Maintain records	1
1		Submit mid-year request for additional consumption allowances in the event of a public health emergency (MDIs)	1
1	Potential Application-Specific Allowance Holders	Submit new application petition	0.2
	Third Party Audits	Submit annual audit report	1
Annual Total			
3 Year Total			
Annual Average			

Respondent Burden	
\$145.99	Hourly Labor Rate - Technical Staff
\$105.92	Hourly Labor Rate - Clerical Staff

Technical Hours per Response	Clerical Hours per Response	Total Hours per Respondent per Year	Labor Cost per Respondent per Year	O&M Costs per Respondent per Year	Respondents per Activity per Year			T
					Y1	Y2	Y3	
100.0	0	100.0	\$14,599	\$0	1	1	1	1
6.0	0	24.0	\$3,504	\$0	10	10	10	40
20.0	0	20.0	\$2,920	\$0	10	10	10	10
0.0	100	100.0	\$10,592	\$50	10	10	10	10
12.0	0	12.0	\$1,752	\$50	4	4	4	4
0.3	0	0.5	\$73	\$0	4	4	4	8
2.0	0	2.0	\$292	\$0	1	1	1	1
3.0	0	12.0	\$1,752	\$0	1	1	1	4
2.0	0	2.0	\$292	\$0	1	1	1	1
6.0	0	24.0	\$3,504	\$0	75	75	75	300
10.0	0	10.0	\$1,460	\$0	75	75	75	75
0.0	100	100.0	\$10,592	\$50	75	75	75	75
2.0	0	84.0	\$12,263	\$0	2	2	2	84
6.0	0	30.0	\$4,380	\$0	2	2	2	10
0.3	0	25.0	\$3,650	\$0	75	75	75	7,500
0.3	0	1.3	\$182	\$0	2	2	2	10
0.0	20	20.0	\$2,118	\$50	2	2	2	2
2.0	0	2.0	\$292	\$0	2	2	2	2
2.0	0	2.0	\$292	\$0	75	75	75	75
1.0	0	4.0	\$584	\$0	1	1	1	4
0.0	1	1.0	\$106	\$50	10	10	10	10
0.0	20	20.0	\$2,118	\$50	5	5	5	5
0.0	20	20.0	\$2,118	\$50	100	100	100	100
6.0	0	24.0	\$3,504	\$0	26	26	26	104
10.0	0	10.0	\$1,460	\$0	26	26	26	26
0.0	20	20.0	\$2,118	\$50	4	4	4	4
6.0	0	96.0	\$14,015	\$0	16	16	16	256
1.0	0	4.0	\$584	\$0	1	1	1	4
6.0	0	18.0	\$2,628	\$0	3	3	3	9
2.0	0	6.0	\$876	\$0	3	3	3	9
2.0	0	8.0	\$1,168	\$0	3	3	3	12
0.0	20	20.0	\$2,118	\$50	3	3	3	3
100.0	0	100.0	\$14,599	\$0	1	1	1	1
4.0	0	4.0	\$584	\$0	10	10	10	10
0.0	20	20.0	\$2,118	\$50	10	10	10	10
2.0	0	2.0	\$292	\$0	10	10	10	10
2.0	0	2.0	\$292	\$0	10	10	10	10
100.0	0	100.0	\$14,599	\$0	1	1	1	1

4.0	0	4.0	\$584	\$0	3	3	3	3
0.0	20	20.0	\$2,118	\$50	3	3	3	3
2.0	0	2.0	\$292	\$0	3	3	3	3
100.0	0	100.0	\$14,599	\$0	1	1	1	1
6.0	0	6.0	\$876	\$0	4	4	4	4
40.0	0	40.0	\$5,840	\$0	0	0	0	-
9.4	0	37.6	\$5,489	\$0	31	31	31	124
10.0	0	10.0	\$1,460	\$0	31	31	31	31
0.0	60	60.0	\$6,355	\$50	31	31	31	31
0.0	20	20.0	\$2,118	\$50	50	50	50	50
9.4	0	37.6	\$5,489	\$0	4	4	4	16
10.0	0	10.0	\$1,460	\$0	4	4	4	4
0.0	40	40.0	\$4,237	\$50	4	4	4	4
6.0	0	18.0	\$2,628	\$0	11	11	11	33
6.0	0	6.0	\$876	\$0	1	1	1	1
6.0	0	6.0	\$876	\$0	1	1	1	1
6.0	0	6.0	\$876	\$0	5	5	5	5
6.0	0	12.0	\$1,752	\$0	46	46	46	92
6.0	0	6.0	\$876	\$0	54	54	54	54
6.0	0	12.0	\$1,752	\$0	46	46	46	92
2.0	0	4.0000	\$584	\$0	46	46	46	92
0.0	80	80.0	\$8,474	\$50	46	46	46	46
6.0	0	6.0	\$876	\$0	8	8	8	8
90.0	0	18.0	\$2,628	\$0	5	5	5	1
40.0	0	40.0	\$5,840	\$6,453	162	162	162	162
								9,661

Total Responses per Year		Total Hours per Year			Total Labor Cost per Year		
Y2	Y3	Y1	Y2	Y3	Y1	Y2	Y3
1	1	100	100	100	\$14,599	\$14,599	\$14,599
40	40	240	240	240	\$35,038	\$35,038	\$35,038
10	10	200	200	200	\$29,198	\$29,198	\$29,198
10	10	1,000	1,000	1,000	\$105,920	\$105,920	\$105,920
4	4	48	48	48	\$7,008	\$7,008	\$7,008
8	8	2	2	2	\$292	\$292	\$292
1	1	2	2	2	\$292	\$292	\$292
4	4	12	12	12	\$1,752	\$1,752	\$1,752
1	1	2	2	2	\$292	\$292	\$292
300	300	1,800	1,800	1,800	\$262,782	\$262,782	\$262,782
75	75	750	750	750	\$109,493	\$109,493	\$109,493
75	75	7,500	7,500	7,500	\$794,400	\$794,400	\$794,400
84	84	168	168	168	\$24,526	\$24,526	\$24,526
10	10	60	60	60	\$8,759	\$8,759	\$8,759
7,500	7,500	1,875	1,875	1,875	\$273,731	\$273,731	\$273,731
10	10	3	3	3	\$365	\$365	\$365
2	2	40	40	40	\$4,237	\$4,237	\$4,237
2	2	4	4	4	\$584	\$584	\$584
75	75	150	150	150	\$21,899	\$21,899	\$21,899
4	4	4	4	4	\$584	\$584	\$584
10	10	10	10	10	\$1,059	\$1,059	\$1,059
5	5	100	100	100	\$10,592	\$10,592	\$10,592
100	100	2,000	2,000	2,000	\$211,840	\$211,840	\$211,840
104	104	624	624	624	\$91,098	\$91,098	\$91,098
26	26	260	260	260	\$37,957	\$37,957	\$37,957
4	4	80	80	80	\$8,474	\$8,474	\$8,474
256	256	1,536	1,536	1,536	\$224,241	\$224,241	\$224,241
4	4	4	4	4	\$584	\$584	\$584
9	9	54	54	54	\$7,883	\$7,883	\$7,883
9	9	18	18	18	\$2,628	\$2,628	\$2,628
12	12	24	24	24	\$3,504	\$3,504	\$3,504
3	3	60	60	60	\$6,355	\$6,355	\$6,355
1	1	100	100	100	\$14,599	\$14,599	\$14,599
10	10	40	40	40	\$5,840	\$5,840	\$5,840
10	10	200	200	200	\$21,184	\$21,184	\$21,184
10	10	20	20	20	\$2,920	\$2,920	\$2,920
10	10	20	20	20	\$2,920	\$2,920	\$2,920
1	1	100	100	100	\$14,599	\$14,599	\$14,599

3	3	12	12	12	\$1,752	\$1,752	\$1,752
3	3	60	60	60	\$6,355	\$6,355	\$6,355
3	3	6	6	6	\$876	\$876	\$876
1	1	100	100	100	\$14,599	\$14,599	\$14,599
4	4	24	24	24	\$3,504	\$3,504	\$3,504
-	-	0	0	0	\$0	\$0	\$0
124	124	1,166	1,166	1,166	\$170,166	\$170,166	\$170,166
31	31	310	310	310	\$45,257	\$45,257	\$45,257
31	31	1,860	1,860	1,860	\$197,011	\$197,011	\$197,011
50	50	1,000	1,000	1,000	\$105,920	\$105,920	\$105,920
16	16	150	150	150	\$21,957	\$21,957	\$21,957
4	4	40	40	40	\$5,840	\$5,840	\$5,840
4	4	160	160	160	\$16,947	\$16,947	\$16,947
33	33	198	198	198	\$28,906	\$28,906	\$28,906
1	1	6	6	6	\$876	\$876	\$876
1	1	6	6	6	\$876	\$876	\$876
5	5	30	30	30	\$4,380	\$4,380	\$4,380
92	92	552	552	552	\$80,586	\$80,586	\$80,586
54	54	324	324	324	\$47,301	\$47,301	\$47,301
92	92	552	552	552	\$80,586	\$80,586	\$80,586
92	92	184	184	184	\$26,862	\$26,862	\$26,862
46	46	3,680	3,680	3,680	\$389,786	\$389,786	\$389,786
8	8	48	48	48	\$7,008	\$7,008	\$7,008
1	1	90	90	90	\$13,139	\$13,139	\$13,139
162	162	6,480	6,480	6,480	\$946,015	\$946,015	\$946,015
9,661	9,661	36,248	36,248	36,248	\$4,580,530.03	\$4,580,530.03	\$4,580,530.03
28,983		108,743			\$13,741,590		
9,661		36,248			\$4,580,530		

Total O&M Costs per Year	Total Cost per Year		
	Y1	Y2	Y3
\$0	\$14,599	\$14,599	\$14,599
\$0	\$35,038	\$35,038	\$35,038
\$0	\$29,198	\$29,198	\$29,198
\$500	\$106,420	\$106,420	\$106,420
\$200	\$7,208	\$7,208	\$7,208
\$0	\$292	\$292	\$292
\$0	\$292	\$292	\$292
\$0	\$1,752	\$1,752	\$1,752
\$0	\$292	\$292	\$292
\$0	\$262,782	\$262,782	\$262,782
\$0	\$109,493	\$109,493	\$109,493
\$3,750	\$798,150	\$798,150	\$798,150
\$0	\$24,526	\$24,526	\$24,526
\$0	\$8,759	\$8,759	\$8,759
\$0	\$273,731	\$273,731	\$273,731
\$0	\$365	\$365	\$365
\$100	\$4,337	\$4,337	\$4,337
\$0	\$584	\$584	\$584
\$0	\$21,899	\$21,899	\$21,899
\$0	\$584	\$584	\$584
\$500	\$1,559	\$1,559	\$1,559
\$250	\$10,842	\$10,842	\$10,842
\$5,000	\$216,840	\$216,840	\$216,840
\$0	\$91,098	\$91,098	\$91,098
\$0	\$37,957	\$37,957	\$37,957
\$200	\$8,674	\$8,674	\$8,674
\$0	\$224,241	\$224,241	\$224,241
\$0	\$584	\$584	\$584
\$0	\$7,883	\$7,883	\$7,883
\$0	\$2,628	\$2,628	\$2,628
\$0	\$3,504	\$3,504	\$3,504
\$150	\$6,505	\$6,505	\$6,505
\$0	\$14,599	\$14,599	\$14,599
\$0	\$5,840	\$5,840	\$5,840
\$500	\$21,684	\$21,684	\$21,684
\$0	\$2,920	\$2,920	\$2,920
\$0	\$2,920	\$2,920	\$2,920
\$0	\$14,599	\$14,599	\$14,599

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Year
Year 1
Year 2
Year 3
Annual Average

Total Hours/Year
Reporting
Recordkeeping
Third-Party Disclosure

Total Non-Labor Cost/Year
Reporting
Recordkeeping
Third-Party Disclosure

\$0	\$1,752	\$1,752	\$1,752	1
\$150	\$6,505	\$6,505	\$6,505	2
\$0	\$876	\$876	\$876	3
\$0	\$14,599	\$14,599	\$14,599	1
\$0	\$3,504	\$3,504	\$3,504	1
\$0	\$0	\$0	\$0	1
\$0	\$170,166	\$170,166	\$170,166	1
\$0	\$45,257	\$45,257	\$45,257	1
\$1,550	\$198,561	\$198,561	\$198,561	2
\$2,500	\$108,420	\$108,420	\$108,420	2
\$0	\$21,957	\$21,957	\$21,957	1
\$0	\$5,840	\$5,840	\$5,840	1
\$200	\$17,147	\$17,147	\$17,147	2
\$0	\$28,906	\$28,906	\$28,906	1
\$0	\$876	\$876	\$876	1
\$0	\$876	\$876	\$876	1
\$0	\$4,380	\$4,380	\$4,380	1
\$0	\$80,586	\$80,586	\$80,586	1
\$0	\$47,301	\$47,301	\$47,301	1
\$0	\$80,586	\$80,586	\$80,586	1
\$0	\$26,862	\$26,862	\$26,862	3
\$2,300	\$392,086	\$392,086	\$392,086	2
\$0	\$7,008	\$7,008	\$7,008	1
\$0	\$13,139	\$13,139	\$13,139	1
\$1,045,354	\$1,991,369	\$1,991,369	\$1,991,369	1
\$1,063,203.60	\$5,643,733.63	\$5,643,733.63	\$5,643,733.63	
\$3,189,611	\$16,931,201			
\$1,063,204	\$5,643,734			



Total Responses	Total Hours	Total Labor Costs	Total O&M Costs	Total Costs
9,661	36,248	\$4,580,530	\$1,063,204	\$5,643,734
9,661	36,248	\$4,580,530	\$1,063,204	\$5,643,734
9,661	36,248	\$4,580,530	\$1,063,204	\$5,643,734
9,661	36,248	\$4,580,530	\$1,063,204	\$5,643,734

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3.75

Year 1	Year 2	Year 3	Average
18,220	18,220	18,220	18,220
17,750	17,750	17,750	17,750
278	278	278	278

Year 1	Year 2	Year 3	Average
1,045,554	1,045,554	1,045,554	1,045,554
17,650	17,650	17,650	17,650
0	0	0	0

Respondent Type	Activity	Responses per Respondent per Year	Incremental Technical Hours per Response
HFC Producer	Submit quarterly production for export report	4	3
	Submit annual production for export certification	1	2
HFC Importer	Maintain records on HFCs purchased at government auction	1	0
Application-Specific Allowance Holders	Submit mid-year request for additional consumption allowances in the event of a public health emergency (MDIs)	1	6
Potential Application-Specific Allowance Holders	Submit new application petition	0.2	90

Respondent Burden - Prior ICR Rates	
\$145.99	Hourly Labor Rate - Technical Staff
\$105.92	Hourly Labor Rate - Clerical Staff

Incremental Clerical Hours per Response	Total Incremental Hours per Respondent per Year	Incremental Labor Cost per Respondent per Year	Incremental O&M Costs per Respondent per Year	Respondents per Activity per Year			Total Responses per	
				Y1	Y2	Y3	Y1	Y2
0	12.0	\$1,752	\$0	1	1	1	4	4
0	2.0	\$292	\$0	1	1	1	1	1
1	1.0	\$106	\$50	10	10	10	10	10
0	6.0	\$876	\$0	8	8	8	8	8
0	18.0	\$2,628	\$0	5	5	5	1	1

r Year	Total Incremental Hours per Year			Total Incremental Labor Cost per Year			Total Incremental O&M Costs per Year	Total Incremental Costs	
	Y3	Y1	Y2	Y3	Y1	Y2		Y3	Y1
4	12	12	12	\$1,752	\$1,752	\$1,752	\$0	\$1,752	\$1,752
1	2	2	2	\$292	\$292	\$292	\$0	\$292	\$292
10	10	10	10	\$1,059	\$1,059	\$1,059	\$500	\$1,559	\$1,559
8	48	48	48	\$7,008	\$7,008	\$7,008	\$0	\$7,008	\$7,008
1	90	90	90	\$13,139	\$13,139	\$13,139	\$0	\$13,139	\$13,139
								\$23,750	\$23,750

per Year
Y3
\$1,752
\$292
\$1,559
\$7,008
\$13,139
\$23,750

Prior ICR (2024 Allocation Rule)

Year	Total Responses	Total Hours	Total Labor Costs
Year 1	9,637	36,086	\$4,110,344
Year 2	9,637	36,086	\$4,110,344
Year 3	9,637	36,086	\$4,110,344

This ICR (2025 Application-specific Allowances Rule)

Year	Total Responses	Total Hours	Total Labor Costs
Year 1	9,661	36,248	\$4,580,530
Year 2	9,661	36,248	\$4,580,530
Year 3	9,661	36,248	\$4,580,530
Annual Average	9,661	36,248	\$4,580,530

Difference relative to Adjusted Prior ICR

Year	Change in Total Responses	Change in Total Hours	Change in Total Labor Costs
Year 1	24	162	\$470,186
Year 2	24	162	\$470,186
Year 3	24	162	\$470,186

Change in Burden Breakout

Change Type	Year 1	Year 2	Year 3
Assumption*	\$481,540	\$481,540	\$481,540
Rulemaking**	\$23,750	\$23,750	\$23,750

* Updates to labor rates used for both labor and O&M costs

** See Question 15 of the Supporting Statement for additional details

Total O&M Costs	Total Costs
\$1,028,100	\$5,138,444
\$1,028,100	\$5,138,444
\$1,028,100	\$5,138,444

Total O&M Costs	Total Costs
\$1,063,204	\$5,643,734
\$1,063,204	\$5,643,734
\$1,063,204	\$5,643,734
\$1,063,204	\$5,643,734

Change in Total O&M Costs	Change in Total Costs
\$35,103	\$505,290
\$35,103	\$505,290
\$35,103	\$505,290

Agency Assumptions

Activity	Managerial Hours per activity	Technical Hours per activity	Clerical Hours per activity
Notify Submitters of Baseline Allowances	0.1	1.0	0.0
Review Data for Reporting Completeness and Compliance	0.0	0.3	0.0
Process Transfer Reports	0.1	0.5	0.0
Review Petitions to Import HFCs	0.1	1.0	0.0
Review Importer of Record Reports	0.1	1.0	0.0
Review Third-Party Audits	0.1	2.0	0.0
Provide Reporting Guidance	0.0	2.0	0.0
Conduct Stakeholder Outreach Efforts	4.0	60.0	0.0
Maintain the Data Tracking System	40.0	750.0	0.0
Review Import Data Submitted in ACE	0.0	0.3	0.0
Conduct Compliance Monitoring Activities	120.0	2500.0	0.0
Ensure Non-Exceedance of AIM Act Limits	20.0	80.0	0.0
Review Application-specific Allowance Petitions	200.0	500.0	0.0

Activity	Number of Activities		
	Y1	Y2	Y3
Notify Submitters of Baseline Allowances	85	85	85
Review Data for Reporting Completeness and Compliance	1,161	1,161	1,161
Process Transfer Reports	40	40	40
Review Petitions to Import HFCs	94	94	94
Review Importer of Record Reports	75	75	75
Review Third-Party Audits	162	162	162
Provide Reporting Guidance	40	40	40
Conduct Stakeholder Outreach Efforts	1	1	1
Maintain the Data Tracking System	1	1	1
Review Import Data Submitted in ACE	84	84	84
Conduct Compliance Monitoring Activities	2	2	2
Ensure Non-Exceedance of AIM Act Limits	1	1	1
Review Application-specific Allowance Petitions	0.2	0.2	0.2



Contractor Hours per activity	Source
1.0	Based on ODS ICR and input from EPA
0.5	Based on ODS ICR, input from EPA, and HFC reporting experience
0.5	Based on ODS ICR
0.5	Based on ODS ICR and input from EPA
0.0	
4.0	Based on input from EPA
2.0	Based on ODS ICR plus an increase since new program
120.0	Based on ODS ICR plus an increase since new program
1800.0	Based on input from EPA
0.1	Based on input from EPA
750.0	Based on input from EPA
80.0	Based on ODS ICR and input from EPA
1000.0	Based on input from EPA

Source
Equals the number of producers + importers
Equals the number of one-time reports, producer, importer, exporter, transformation, destruction, process agent, RACA, and application-specific allowance holder reports received per year
Equals the number of trade reports received per year
Equals the number of petitions to import for destruction received per year
Equals the maximum number of importers
Based on ODS ICR
Based on current import level and EPA estimated effort
imports and exports
Based on estimate of receiving one petition over five-year period

Agency Burden

Activity	Managerial Hours per Activity	Technical Hours per Activity	Clerical Hours per Activity
Notify Submitters of Baseline Allowances	0.1	1.0	0.0
Review Data for Reporting Completeness and Compliance	0.0	0.3	0.0
Process Transfer Reports	0.1	0.5	0.0
Review Petitions to Import HFCs	0.1	1.0	0.0
Review Importer of Record Reports	0.1	1.0	0.0
Review Third-Party Audits	0.1	2.0	0.0
Provide Reporting Guidance	0.0	2.0	0.0
Conduct Stakeholder Outreach Efforts	4.0	60.0	0.0
Maintain the Data Tracking System	40.0	750.0	0.0
Review Import Data Submitted in ACE	0.0	0.3	0.0
Conduct Compliance Monitoring Activities	120.0	2,500.0	0.0
Ensure Non-Exceedance of AIM Act Limits	20.0	80.0	0.0
Review Application-specific Allowance Petitions	200.0	500.0	0.0
TOTAL			
3 Year Total			
Annual Average			

Hourly Rates			
Managerial Rate	GS 15 Step 1	\$80.31	1.6
Technical Rate	GS 13 Step 1	\$57.78	1.6
Clerical Rate	GS 11 Step 1	\$40.54	1.6
Extramural Rate			



Contractor Hours per Activity	Number of Activities			Total Hours		
	Y1	Y2	Y3	Y1	Y2	Y3
1.0	85	85	85	179	179	179
0.5	1,161	1,161	1,161	964	964	964
0.5	40	40	40	44	44	44
0.5	94	94	94	150	150	150
0.0	75	75	75	83	83	83
4.0	162	162	162	988	988	988
2.0	40	40	40	160	160	160
120.0	1	1	1	184	184	184
1,800.0	1	1	1	2,590	2,590	2,590
0.1	84	84	84	30	30	30
750.0	2	2	2	6,740	6,740	6,740
80.0	1	1	1	180	180	180
1,000.0	0.2	0.2	0.2	340	340	340
				12,631	12,631	12,631
				37,894.4		
				12,631		

Managerial Cost		
Y1	Y2	Y3
\$1,092	\$1,092	\$1,092
\$0	\$0	\$0
\$514	\$514	\$514
\$1,208	\$1,208	\$1,208
\$964	\$964	\$964
\$2,082	\$2,082	\$2,082
\$0	\$0	\$0
\$514	\$514	\$514
\$5,140	\$5,140	\$5,140
\$108	\$108	\$108
\$30,840	\$30,840	\$30,840
\$2,570	\$2,570	\$2,570
\$5,140	\$5,140	\$5,140
\$50,172	\$50,172	\$50,172
\$150,515		
\$50,172		

\$128.50
\$92.45
\$64.86
\$137.13

Technical Cost			Clerical Cost			Contractor Cost		
Y1	Y2	Y3	Y1	Y2	Y3	Y1	Y2	Y3
\$7,858	\$7,858	\$7,858	\$0	\$0	\$0	\$11,656	\$11,656	\$11,656
\$35,420	\$35,420	\$35,420	\$0	\$0	\$0	\$79,604	\$79,604	\$79,604
\$1,849	\$1,849	\$1,849	\$0	\$0	\$0	\$2,743	\$2,743	\$2,743
\$8,690	\$8,690	\$8,690	\$0	\$0	\$0	\$6,445	\$6,445	\$6,445
\$6,934	\$6,934	\$6,934	\$0	\$0	\$0	\$0	\$0	\$0
\$29,954	\$29,954	\$29,954	\$0	\$0	\$0	\$88,860	\$88,860	\$88,860
\$7,396	\$7,396	\$7,396	\$0	\$0	\$0	\$10,970	\$10,970	\$10,970
\$5,547	\$5,547	\$5,547	\$0	\$0	\$0	\$16,456	\$16,456	\$16,456
\$69,338	\$69,338	\$69,338	\$0	\$0	\$0	\$246,834	\$246,834	\$246,834
\$1,941	\$1,941	\$1,941	\$0	\$0	\$0	\$1,152	\$1,152	\$1,152
\$462,250	\$462,250	\$462,250	\$0	\$0	\$0	\$205,695	\$205,695	\$205,695
\$7,396	\$7,396	\$7,396	\$0	\$0	\$0	\$10,970	\$10,970	\$10,970
\$9,245	\$9,245	\$9,245	\$0	\$0	\$0	\$27,426	\$27,426	\$27,426
\$653,818	\$653,818	\$653,818	\$0	\$0	\$0	\$708,811	\$708,811	\$708,811
\$1,961,455			\$0			\$2,126,434		
\$653,818			\$0			\$708,811		



Total Cost		
Y1	Y2	Y3
\$20,607	\$20,607	\$20,607
\$115,024	\$115,024	\$115,024
\$5,106	\$5,106	\$5,106
\$16,343	\$16,343	\$16,343
\$7,898	\$7,898	\$7,898
\$120,896	\$120,896	\$120,896
\$18,366	\$18,366	\$18,366
\$22,517	\$22,517	\$22,517
\$321,312	\$321,312	\$321,312
\$3,201	\$3,201	\$3,201
\$698,785	\$698,785	\$698,785
\$20,936	\$20,936	\$20,936
\$41,811	\$41,811	\$41,811
\$1,412,801	\$1,412,801	\$1,412,801
\$4,238,404		
\$1,412,801		

Year	Total Hours	Total Costs
Year 1	12,631	\$1,412,801
Year 2	12,631	\$1,412,801
Year 3	12,631	\$1,412,801
Annual Average	12,631	\$1,412,801

Respondent + EPA Avg \$7,056,535