

U.S. Environmental Protection Agency

Information Collection Request

Title: Production, Import, Export, Recycling, Destruction, Transshipment, and Feedstock Use of Ozone-Depleting Substances (Proposed Rule for Updates Related to Use of Ozone-Depleting Substances as Process Agents)

OMB Control Number: 2060-0170

EPA ICR Number: 1432.39

Abstract: This rule-related information collection request (ICR) is being proposed in accordance with the proposed rulemaking, "Updates Related to the Use of Ozone-Depleting Substances as Process Agents." In the proposed rule, EPA is proposing to establish recordkeeping and reporting requirements for uses of ozone-depleting substances (ODS) as process agents and to update definitions to reflect current practice. Reporters subject to the proposed rule, if finalized, would be required to report information concerning these process agent uses, including consumption and emissions data, using the Ozone-Depleting Substances Tracking System (ODSTS), or another format specified by EPA.

Supporting Statement A

1. NEED AND AUTHORITY FOR THE COLLECTION

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

This information collection is authorized under the CAA (42 U.S.C. 7414, 7601, 7671-7671q). For electronic reporting, the Paperwork Reduction Act (PRA) requires Federal agencies to manage information resources to reduce information collection burdens on the public; increase program efficiency and effectiveness; and improve the integrity, quality, and utility of information to all users within and outside the Agency, including capabilities for ensuring dissemination of public information, public access to government information, and protections for privacy and security (44 USC 3506).]

2. PRACTICAL UTILITY/USERS OF THE DATA

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

The reporting and recordkeeping requirements for uses of ODS would provide clear and consistent notice each year of information EPA collects, aggregates, and reports as a party to the Montreal Protocol on Substances that Deplete the Ozone Layer; effectively monitor these narrow uses in a more routine and consistent manner under the Clean Air Act; and enhance understanding of emissions of substances harmful to the ozone layer.

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.

Information required under this ICR will be reported electronically to EPA through the Central Data Exchange (CDX). One-time and annual data will be reported using reporting forms for class I and class II controlled substances. EPA will use the ozone-depleting substance tracking system (ODSTS) or a designated successor system to collect and track data submitted through CDX. The ODSTS is used by EPA to collect and track data on ozone-depleting substances that are reported in accordance with 40 CFR part 82. The system is designed to collect and store CBI.

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.

While subject entities may report some related information, such as for existing importer and producer reporting requirements in 40 CFR 82.13 for class I controlled substances and 40 CFR 82.24 for class II controlled substances, EPA is requesting specific information not required to be submitted under existing 40 CFR part 82 requirements. The Greenhouse Gas Reporting Program (GHGRP) was established in 2009 and requires various facilities and suppliers to annually report data to EPA (see 40 CFR part 98). A subpart that relates to reporting on emissions from similar entities is subpart L, "Fluorinated Gas Production." Subpart L of the GHGRP requires reporting and recordkeeping of emissions from owners or operators of facilities that produce a fluorinated gas from any raw material or feedstock chemical, except for processes that generate HFC-23 during the production of HCFC-22. However, generation or emissions of ODS are not included in the reporting threshold, and ODS emissions are not included in the reporting requirements. While there is potential for some overlap in GHGRP reporting with this ICR, EPA's understanding is that these entities are not generally subject to related GHGRP requirements and would not generally submit information under these requirements that are already required to be submitted by the GHGRP. Therefore, duplication in reporting requirements is not anticipated.

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.

Small entities are not expected to be affected by the proposed rule and this ICR.

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.

Less frequent than annual collection of data would hinder EPA's ability to support international agreements concerning the use of controlled substances as process agents and to provide relevant information to EPA concerning implications of these uses and emissions. The annual reporting requirement, as well as an as-needed report of significant process changes, provides EPA the ability to resolve, in a timely manner, discrepancies in the data reported to us.

7. GENERAL GUIDELINES

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

The reporting and recordkeeping requirements do not exceed any of the OMB guidelines found at 5 CFR 1320.5(d)(2).

8. PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

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

The proposed rulemaking "Protection of Stratospheric Ozone: Updates Related to the Use of Ozone-Depleting Substances as Process Agents" will serve as the public notice for this ICR. EPA is requesting comment on this ICR in the proposed rulemaking published on 10/19/23 (88 FR 72027).

8b. Consultations

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

The burden calculations were developed based on EPA's experience collecting data on ODS under 40 CFR part 82 and similar information under the GHGRP. EPA collected comments on the proposed rulemaking "Protection of Stratospheric Ozone: Updates Related to the Use of Ozone-Depleting Substances as Process Agents" and will adjust this ICR as needed.

9. PAYMENTS OR GIFTS TO RESPONDENTS

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

N/A

10. ASSURANCE OF CONFIDENTIALITY

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

EPA has proposed determinations concerning whether information that would be reported under this rule would be considered confidential. These determinations can be found in the proposal's preamble. Unless otherwise noted, remaining data elements reported to the Agency can be claimed as CBI by reporting entities, and EPA will treat them as confidential pending possible future CBI determinations pursuant to EPA's CBI regulations at 40 CFR 2.203. For all data elements that EPA has determined to be confidential or for which EPA will provide provisional confidential treatment if claimed by reporters as CBI, EPA may release aggregated data if there are three or more reporting entities.

11. JUSTIFICATION FOR SENSITIVE QUESTIONS

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

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

12. RESPONDENT BURDEN HOURS & LABOR COSTS

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

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.*
 - If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*
 - Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.*
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12a. Respondents/NAICS Codes

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

Table I. NAICS Classification of Potentially Affected Entities

Category	NAICS code
Industrial Gas Manufacturing	325120
Other Basic Inorganic Chemical Manufacturing	325180
All Other Basic Organic Chemical Manufacturing	325199

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12b. Information Requested

All entities which use controlled substances as process agents must record and/or report the following on a one time, annual and/or as needed basis.

Process Agent Use One-time Report (class I and class II):

- The name and address of each facility and plant, and each responsible person's name, email address, and phone number;
- The name, purpose, and final product manufactured of each process agent application that uses a controlled substance;
- The start-up date of each facility and plant that uses a controlled substance as a process agent;
- For each facility, the names and amounts of each product and byproduct manufactured in the process agent application during the previous control period, including amounts destroyed or used as a feedstock;
- For each facility, the total air, fugitive air, and stack point air emissions of controlled substances used as a process agent during the previous control period;
- For each facility, a description of technologies currently being used and actions taken or currently under evaluation to minimize use or emissions of controlled substances used as process agents (including estimated emissions reductions associated with each); and
- For each facility, a description that includes details of the percentages of controlled substances used as a process agent and retained within the process agent application, recovered after the process agent application, and emitted or entrained in the final product.
- For each process listed in § 82.25(b)(2):
 - A description and identification of the process listed in § 82.25(b)(2).
 - A description and number, letter, or other identifier for each process vent associated with the process. This identifier must be a consistent name reported from year to year.
 - The method(s) used to determine the mass emissions from each process vent associated with the process (i.e., process-vent-specific emission factor or process-vent-specific emission calculation factor).
 - The method(s) used to determine the mass emissions from equipment leaks associated with the process.
 - For each controlled substance, each entity must report the total mass in kilograms of the controlled substance emitted from the processes listed in § 82.25 (b)(2).
- For each controlled substance, the total mass in kilograms of the controlled substance emitted from the processes listed in § 82.25(b)(2).
- For each process and controlled substance, the effective destruction efficiency, $DE_{\text{effective}}$, calculated for that process using equation 13 of § 82.25.
- The monitoring plan, as specified in § 82.25(f)(6), including any revisions since the prior year's submission, as applicable.
- For processes whose emissions are determined using the emission factor approach under § 82.25(c)(1)(iii) or the emission calculation factor under § 82.25(c)(1)(iv), the following for each process:
 - The identity and quantity of the process activity used to estimate emissions (e.g., tons of product produced, or tons of reactant consumed) for each process vent associated with the process.

- The site-specific, process-vent- specific emission factor(s) or emission calculation factor for each process vent associated with the process.
 - For each controlled substance, the mass emitted from each process vent associated with the process, in kilograms.
 - For each controlled substance, the total mass emitted from equipment leaks, in kilograms.
- For each facility that destroys a controlled substance, the excess emissions that result from malfunctions of the destruction unit, and these excess emissions must be reflected in the controlled substance estimates in § 82.25(c)(1).
- For each facility that destroys controlled substances, a report containing the information in § 82.25(e)(4)(i) through (4)(iii). This report is one-time unless a change is made to the destruction unit that would be expected to affect its destruction efficiencies.
 - Chemical identity of the controlled substance(s) used in the performance test conducted to determine destruction efficiency, including surrogates, and information on why the surrogate is sufficient to demonstrate the destruction efficiency for each controlled substance, consistent with requirements in § 82.25(d)(6)(i), vented to the destruction unit.
 - Date of the most recent destruction unit test.
 - Name of all applicable Federal or State regulations that may apply to the destruction process.
- For each facility that destroys controlled substances, separately from the controlled substance emissions reported under § 82.25(e)(2), the following for each previously produced controlled substance destroyed:
 - The mass of the controlled substance emitted from the destruction unit (kilograms).
- For each facility that destroys controlled substance(s) used as a process agent a one-time report, that describes any measurements, research, or analysis that it has performed or obtained that relate to the formation of products of incomplete combustion that are controlled substances during the destruction of controlled substances. The report must include the methods and results of any measurement or modeling studies, including the products of incomplete combustion for which the exhaust stream was analyzed, as well as copies of relevant scientific papers, if available, or citations of the papers, if they are not. No new testing is required to fulfill this requirement.

Process Agent Use Annual Report (class I and class II):

- For each facility, contact information including email address and phone number for a primary and alternate contact person;
- For each facility, the name and amount of each controlled substance initially introduced into the process agent application for use as a process agent, specified independently whether the controlled substance was:
 - Obtained as virgin;
 - Obtained as used;
 - Produced by the entity;
 - Purchased from a U.S. producer;
 - Imported;
 - Reclaimed by the entity from a different use; and
 - Reclaimed by another entity.

- For each facility, the name and amount of each controlled substance used as a process agent and reused or recycled by the entity for continued use in the same process agent application at the same facility;
- For each facility, the name and amount of each controlled substance used as a process agent that was ultimately:
 - Transformed;
 - Reused or recycled for use in a different process agent application; or
 - Destroyed by approved destruction technologies.
- For each facility, the total air, fugitive air, and stack point air emissions of each controlled substance used as a process agent;
- For each facility, the names and amounts of each product and byproduct manufactured in the process agent application during the previous control period, including amounts destroyed or used as a feedstock;
- For each facility, a description of emission reduction actions for controlled substances used as a process agent taken since the last one-time or annual report, planned, or currently under evaluation;
- For each process listed in § 82.25(b)(2):
 - A description and identification of the process listed in § 82.25(b)(2).
 - A description and number, letter, or other identifier for each process vent associated with the process. This identifier must be a consistent name reported from year to year.
 - The method(s) used to determine the mass emissions from each process vent associated with the process (i.e., process-vent-specific emission factor or process-vent-specific emission calculation factor).
 - The method(s) used to determine the mass emissions from equipment leaks associated with the process.
- For each controlled substance, the total mass in kilograms of the controlled substance emitted from the processes listed in § 82.25(b)(2).
- For each controlled substance, the total mass in kilograms of the controlled substance emitted from the processes listed in § 82.25(b)(2).
- For each process and controlled substance, the effective destruction efficiency, DE_{effective}, calculated for that process using Equation 13 of § 82.25.
- The monitoring plan, as specified in § 82.25(f)(6), including any revisions since the prior year's submission, as applicable.
- For processes whose emissions are determined using the emission factor approach under § 82.25(c)(1)(iii) or the emission calculation factor under § 82.25(c)(1)(iv), the following for each process:
 - The identity and quantity of the process activity used to estimate emissions (e.g., tons of product produced or tons of reactant consumed) for each process vent associated with the process.
 - The site-specific, process-vent-specific emission factor(s) or emission calculation factor for each process vent associated with the process.
- For each controlled substance, the mass emitted from each process vent associated with the process, in kilograms.
- For each controlled substance, the total mass emitted from equipment leaks, in kilograms.
- For each facility that destroys a controlled substance, the excess emissions that result from malfunctions of the destruction unit, and these excess emissions must be reflected in the controlled substance estimates in § 82.25(c)(1).

- For each facility that destroys controlled substances, a report containing the information in § 82.25(e)(4)(i) through (4)(iii). This report is one-time unless a change is made to the destruction unit that would be expected to affect its destruction efficiencies.
- Chemical identity of the controlled substance(s) used in the performance test conducted to determine destruction efficiency, including surrogates, and information on why the surrogate is sufficient to demonstrate the destruction efficiency for each controlled substance, consistent with requirements in § 82.25(d)(6)(i), vented to the destruction unit.
- Date of the most recent destruction unit test.
- Name of all applicable Federal or State regulations that may apply to the destruction process.
- For each facility that destroys controlled substances, separately from the controlled substance emissions reported under § 82.25(e)(2), the following for each previously produced controlled substance destroyed:
 - The mass of the controlled substance emitted from the destruction unit (kilograms).
- For each facility that destroys controlled substance(s) used as a process agent a one-time report, that describes any measurements, research, or analysis that it has performed or obtained that relate to the formation of products of incomplete combustion that are controlled substances during the destruction of controlled substances. The report must include the methods and results of any measurement or modeling studies, including the products of incomplete combustion for which the exhaust stream was analyzed, as well as copies of relevant scientific papers, if available, or citations of the papers, if they are not. No new testing is required to fulfill this requirement.

Significant Process Changes Report, as needed (Class I and Class II):

- For each facility, any significant process agent application changes anticipated to result in increases for the next annual report of greater than 20 percent of the amount of controlled substance initially introduced for or emitted during use as a process agent by an entity, as compared to the previous control period, must be specified in a report submitted to EPA at least 180 days prior to implementing the change.

Recordkeeping Requirements (class I and class II):

- Dated records of the quantity of each controlled substance produced at each facility for use as a process agent;
- Records identifying the producer or importer of the controlled substance received at each facility for use as a process agent by the person;
- For each facility, copies of the invoices or receipts documenting the sale or other transfer of ownership of each controlled substance for use as a process agent to the person;
- Dated records identifying the quantity of each product manufactured within each facility by using a controlled substance as a process agent;
- For each facility, records of the date and the estimated quantity of any spill or release of each controlled substance used as a process agent that equals or exceeds 100 pounds;
- For each facility, a description of the methodology used to measure and calculate emissions, and dated records of equipment parameters, measured data, supporting calculations, and other rationale used to validate reported emission quantities;
- For each facility, dated records of the quantity of each controlled substance used as a process agent which is subsequently transformed or destroyed;

- In the case where class I controlled substances used as a process agent were ultimately transformed by an entity other than the entity which last used the class I controlled substances as a process agent, a copy of the Internal Revenue Service Certificate showing that the purchaser or recipient of the controlled substance, in the United States or in another country that is a Party, certifies the intent to transform the controlled substance, or sell the controlled substance for transformation;
- In the case where class I controlled substances used as a process agent were ultimately destroyed by an entity other than the entity which last used the class I controlled substances as a process agent, a copy of the destruction verification (as in § 82.13(k)), showing that the purchaser or recipient of a controlled substance, in the United States or in another country that is a Party, certifies the intent to destroy the controlled substance, or sell the controlled substance for destruction;
- In the case where class II controlled substances used as a process agent were ultimately transformed by an entity other than the entity which last used the class II controlled substances as a process agent, a copy of the person's transformation verification as provided under § 82.24(e)(3); and
- In the case where class II controlled substances used as a process agent were ultimately destroyed by an entity other than the entity which last used the class II controlled substances as a process agent, a copy of the person's destruction verification, as provided under § 82.24 (e)(5).
- Identification of all processes subject to § 82.25, including the unit identification as appropriate, the process identification reported for the process under § 82.25(e)(1)(ii)(A) through (B), and the product with which the process is associated.
- Monthly and annual records, as applicable, of all analyses and calculations conducted as required under § 82.25(c), including the data monitored under § 82.25(d), and all information reported as required under § 82.25(e).
- Documentation of the information collected under § 82.25(d)(1).
 - Identification of all continuous process vents with emissions of controlled substances that are included in the top 25 percent of continuous process vents, and all continuous process vents in the remaining group (i.e., 75 percent of continuous process vents with lower emissions of controlled substances). Include the data and calculation used to develop the preliminary estimate of emissions for each process vent.
 - Identification of all batch process vents.
 - For each vent, identification of the method used to develop the factor (i.e., emission factor by emissions test or emission calculation factor).
 - The emissions test data and reports (see § 82.25(d)(2)(v)) and the calculations used to determine the process-vent-specific emission factor, including the actual process-vent-specific emission factor, the average hourly emission rate of each controlled substance from the process vent during the test and the process feed rate, process production rate, or other process activity rate during the test.
 - The process-vent-specific emission calculation factor and the calculations used to determine the process-vent-specific emission calculation factor.
 - The annual process production quantity or other process activity information in the appropriate units, along with the dates and time period during which the process was operating and dates and time periods the process vents are vented to the destruction unit. As an alternative to date and time periods when process vents are vented to the destruction unit, a facility may track dates and time periods that process vents by-pass the destruction unit.

- o Calculations used to determine annual emissions of each controlled substance for each process and the total controlled substance emissions for all processes, i.e., total for facility.
- For each facility that destroys controlled substances and reflects this destruction in § 82.25(c), the emissions performance testing reports (including revised reports) for each destruction unit. The emissions performance testing report must contain all information and data used to derive the destruction efficiency for each controlled substance whose destruction the facility reflects in § 82.25(c), as well as the key process and device conditions during the test. This information includes the following:
 - o Destruction efficiency (DE) determined for each controlled substance whose destruction the facility reflects in § 82.25(c), in accordance with § 82.25(d)(6)(i)(A).
 - o Chemical identity of the controlled substance(s) used in the performance test conducted to determine destruction efficiency, including surrogates, and information on why the surrogate is sufficient to demonstrate destruction efficiency for each controlled substance, consistent with requirements in § 82.25(d)(6)(i)(A), vented to the destruction unit.
 - o Mass flow rate of the stream containing the controlled substance or surrogate into the device during the test.
 - o Concentration (mass fraction) of each controlled substance or surrogate in the stream flowing into the device during the test.
 - o Concentration (mass fraction) of each controlled substance or surrogate at the outlet of the destruction unit during the test.
 - o Mass flow rate at the outlet of the destruction unit during the test.
 - o Test methods and analytical methods used to determine the mass flow rates and controlled substance (or surrogate) concentrations of the streams flowing into and out of the destruction unit during the test.
 - o Destruction unit conditions that are normally monitored for device control, such as temperature, total mass flow rates into the device, and CO or O₂ levels.
 - o Name of all applicable Federal or State regulations that may apply to the destruction process.
- For equipment subject to § 82.25(c)(2), information on the number of each type of equipment, the service of each piece of equipment (gas, light liquid, heavy liquid); the concentration of each controlled substance in the stream; each piece of equipment excluded from monitoring requirement; the time period each piece of equipment was in service, and the emission calculations for each controlled substance for all processes. Depending on the equipment leak monitoring approach followed, each entity must maintain information for equipment on the associated screening data concentrations for greater than or equal to 10,000 ppmv and associated screening data concentrations for less than 10,000 ppmv; associated actual screening data concentrations; and associated screening data and leak rate data (i.e., bagging) used to develop a unit-specific correlation. If a site-specific leak detection approach was developed and followed, provide the records for monitoring events and the emissions estimation calculations, as appropriate, consistent with the approach for equipment leak emission estimation in the monitoring plan.
- Dated records documenting the initial and periodic calibration of all analytical equipment used to determine the concentration of controlled substances, including but not limited to gas chromatographs, gas chromatography-mass spectrometry (GC/MS), gas chromatograph-electron capture detector (GC/ECD), fourier transform infrared (FTIR), and nuclear magnetic

resonance (NMR) devices, and all mass measurement equipment such as weigh scales, flowmeters, and volumetric and density measures used to measure the quantities reported under § 82.25, including the industry standards or manufacturer directions used for calibration pursuant to § 82.25(d)(4), (5), (11), and (12).

- A written monitoring plan must be completed by April 1, 2025, or within 120 days of the date that an entity first meets the criteria in § 82.25(a).
 - At a minimum, the GHG Monitoring Plan shall include the elements listed in § 82.25(f)(6)(i).
 - Identification of positions of responsibility (i.e., job titles) for collection of the emissions data.
 - Explanation of the processes and methods used to collect the necessary data for calculations under § 82.25.
 - Description of the procedures and methods that are used for quality assurance, maintenance, and repair of all continuous monitoring systems, flow meters, and other instrumentation used to provide data for the GHGs reported under this part.
 - The monitoring plan may rely on references to existing corporate documents (e.g., standard operating procedures, quality assurance programs under appendix F to 40 CFR part 60 or appendix B to 40 CFR part 75, and other documents) provided that the elements required by § 82.25(f)(6)(i) are easily recognizable.
 - The owner or operator shall revise the monitoring as needed to reflect changes in production processes, monitoring instrumentation, and quality assurance procedures; or to improve procedures for the maintenance and repair of monitoring systems to reduce the frequency of monitoring equipment downtime.

Collection Schedule

- Entities that use a controlled substance as a process agent must submit a one-time report;
- Entities that use a controlled substance as a process agent must report to EPA annually (45 days after the end of each year);
- Entities that use a controlled substance as a process agent and that have a significant process change must report to EPA as needed (at least 180 days prior to implementing the change).

12c. Respondent Activities

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

Table II. Respondent Activities

Activity	Reporting Frequency
Submit one-time report	One-Time
Submit annual report	Annually
Submit significant process changes report	As Needed
Maintain records	N/A

12d. Respondent Burden Hours and Labor Costs

Estimating Respondent Burden

EPA identified 4 information collection activities that are mandated by EPA's proposed rulemaking. EPA estimated the amount of time associated with each activity based on EPA's experience collecting similar activity data on ozone-depleting substances (ODS) and fluorinated greenhouse gases under 40 CFR part 82 and GHGRP (74 FR 56260; October 30, 2009), respectively. Emissions recordkeeping and reporting are included in each applicable activity. This analysis assumes that respondent burden hours are incurred by technical and clerical staff at companies that submit reports. Table III below summarizes the number of burden hours incurred by each respondent for each information collection activity.

Estimating Respondent Costs

To determine respondent costs, an average hourly wage rate of \$60.54 per hour for technical staff, the hourly wage rate for professional and related persons, was derived from the Bureau of Labor Statistics Employer Cost and Employee Compensation, Table 2. ("civilian workers, by occupational and industry group"), June 2022. An average hourly wage rate of \$47.73 for clerical staff, the hourly wage rate for administrative services and facilities managers, was derived from the BLS Occupational Outlook Handbook, April 2022. A 110 percent increase was added to reflect the estimated additional costs for overhead and fringe, which increased the wage rates to \$127.13 and \$100.23 per hour for technical staff and clerical staff, respectively. Burden hours were multiplied by the labor rate to determine respondent costs. Given the reporting and recordkeeping requirements, an average of \$28,245 annual operation and maintenance (O&M) costs or capital/startup costs are assumed to be associated with this information collection request due to the emissions reporting requirements.

Table I below summarizes labor costs for each respondent by information collection activity. Costs are calculated by multiplying technical burden hours per response by the number of responses per year and the assumed hourly wage rate of technical staff.

TABLE I. HOURS AND COSTS PER RESPONDENT ACTIVITY

Activity	Responses per Respondent per Year	Technical Burden Hours per Response	Clerical Burden Hours per Response	Total Hours per Respondent per Year	Technical Labor Cost per Respondent per Year
Submit one-time report	1	1390.00	197.00	1587.0	\$196,456
Submit annual report	1	72.70	9.00	82.0	\$10,174
Submit significant process changes report	0.1	6.00	0.00	0.7	\$85
Maintain records	1	0.00	42.00	42.0	\$4,210

Estimating the Respondent Universe and Total Burden Costs

The respondent universe for this ICR is based on a review of data available from past reporting to EPA under the Clean Air Act, including in the ODSTS. In total, EPA expects there are no unique respondents subject to the information collection requirements outlined in this ICR due to the proposed incremental changes. This estimate takes into account the fact that the respondent types are not mutually exclusive, meaning a given respondent may be subject to more than one information collection activity.

Table III summarizes the total number of respondents per activity per year as well as total burden hours and costs per year. The number of respondents per activity per year varies across the three years covered by this ICR due to the one-time reporting requirement and anticipated requests for extension. Total respondent burden hours and costs are derived by multiplying the number of respondents per activity by total hours and total costs per respondent per year (see Error: Reference source not found). EPA has not deducted any respondent burden that may already be covered under the GHGRP's ICR (2060-0629).

TABLE III. RESPONDENT BURDEN AND COST TABLE

Activity	Respondents per Activity per Year			Total Hours per Year			Total Cost per Year		
	Y1	Y2	Y3	Y1	Y2	Y3	Y1	Y2	Y3
Submit one-time report	9	0	0	14,283	0	0	\$1,768,763	\$0	\$0
Submit annual report	9	9	9	54	1,080	1,080	\$6,865	\$125,600	\$125,600
Submit significant process changes report	9	9	9	6	6	6	\$763	\$763	\$763
Maintain records	9	9	9	450	450	450	\$37,887	\$37,887	\$37,887

Respondent Tally

As shown in Table V. Respondent Burden Summary Table, EPA estimates the total annual hour and cost burden to all respondents to average 5,883 hours and \$719,593.

TABLE V. RESPONDENT BURDEN SUMMARY TABLE

Year	Total Responses	Total Hours	Total Costs
Year 1	28	14,721	\$1,830,278
Year 2	19	1,464	\$164,250
Year 3	19	1,464	\$164,250
Annual Average	22	5,883	\$719,593

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.

Respondent Type	Activity	Total O&M Costs per Year	Total Cost per Year		
			Y1	Y2	Y3
ODS Process Agent Use	Submit one-time report	\$5,553	\$1,784,763	\$0	\$0
	Submit annual report	\$22,692	\$6,865	\$125,600	\$125,600
	Submit significant process changes report	\$0	\$763	\$763	\$763
	Maintain records	\$0	\$37,887	\$37,887	\$37,887
Annual Total		\$ 28,245	\$ 1,830,278	\$ 164,250	\$ 164,250
3 Year Total		\$84,735	\$2,158,778		
Annual Average		\$28,245	\$719,593		

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

EPA identified one activity incurred by the federal government associated with this data collection request. Burden associated with each activity is based on EPA's past experience with reporting and data collection of HFCs and ODS. The number of occurrences of each activity is based on the estimated number of responses per year for each year of this ICR (discussed further in question 12).

14b. Agency Labor Cost

Costs are subdivided into Agency and contractor costs. The average hourly rates for the EPA technical and managerial staff of \$51.18 and \$71.15, respectively, are derived from the 2022 annual base pay table, which was retrieved from the Office of Personnel Management website. The rate for technical staff is based on a GS-13 step 1 salary and the rate for managerial staff is based on a GS-15 step 1 salary. These rates were then multiplied by the standard government benefits multiplication factor of 1.6 to get hourly rates of \$81.89 for technical staff and \$113.84 for managerial staff. The cost of contractor time is valued at \$130.52 per hour on average, including overhead and fringe. This rate takes into account a weighted average of managerial and technical staff hours, based on rates for Consultant III and Researcher II under GSA Schedule 899-1 Environmental Consulting Services.

Table IIIII summarizes total agency burden and costs by activity.

TABLE IIIII. AGENCY BURDEN AND COST TABLE

Activity	Hours per Response			Number of Activities			Total Hours			Total Costs		
	Man.	Tech.	Cont.	Y1	Y2	Y3	Y1	Y2	Y3	Y1	Y2	Y3
Review Data for Reporting Completeness and Compliance	0.0	0.3	0.5	19	10	10	16.0	8.0	8.0	\$1,753	\$923	\$923

14c. Agency Non-Labor Costs

N/A

15) REASONS FOR CHANGE IN BURDEN

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

This information collection request is a continuation of an existing information collection request approved by OMB, "Production, Import, Export, Recycling, Destruction, Transshipment, and Feedstock Use of Ozone-Depleting Substances (Final Rule)," ICR number 1432.38, OMB Control Number 2060-0170. The proposed requirements, if finalized, would increase the burden (hours and cost) by the quantities included in this draft ICR.

16) PUBLICATION OF DATA

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

N/A

17) DISPLAY OF EXPIRATION DATE

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

N/A

18) CERTIFICATION STATEMENT

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

N/A

