

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

<b>Biannual Reports</b>	<b>Number of unique facilities/companies</b>
App-specific Allowance H	55

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

<b>As Needed Reports</b>	<b>Number of unique facilities/companies</b>	<b>Number of Reports</b>
Transfers	11	34
Conferrals (Suppliers)	3	8
Conferrals (App-specific)	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

## Responent Burden Assumptions

Respondent Type	Acitvity	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 (part of quarterly 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 transhipments	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 (part of quarterly report)	10
	Maintain records	0
	Submit request for additional consumption allowances	6
	Submit notification of transhipments	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
	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 (part of quarterly 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 (part of quarterly 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
<b>Unique number of Respondents</b>		



Clerical Hours per Response	Responses per Year	Maximum Respondents per Acitvity
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; Respndents 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 allowance 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 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

Activity	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 (part of quarterly 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	ICF: National estimate audit would total of 1 the audit Assuming the highest estimate would take average,
Submit quarterly report	26	
Submit annual inventory report (part of quarterly report)	26	
Maintain records	4	
Submit request for	16	
Submit notification	1	
Submit conferral	3	
Provide certification	3	
Provide certification	3	
Maintain records	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

\$37.50 is the hourly wage rate for professional and related persons, derived from Bureau of Labor Statistics Occupational Outlook Handbook, September, 2023.

<https://www.bls.gov/ooh/business-and-financial/accountants-and-auditors.htm>

The rate was then increase by 110% for fringe and benefit.

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 (part of quarterly report)	31	31
Maintain records	31	31
Maintain records	50	50
Submit quarterly report	4	4
Submit annual inventory report (part of quarterly 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
3
3
1
10
10
10
10
1
3
3
3

Audit Costs

Auditor Labor Rate (\$)	Auditor Time (hours)	Total Cost to Respondent (\$)
\$78.75	80	\$ 6,300.00

ACE Report Burden

Respondent
ICF: Provided by EF

Refrigerants  
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80 hours.

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)
PA <div></div>					
		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 (part of quarterly 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 (part of quarterly 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
HFC Transformer	Submit one-time report	1
	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		Submit one-time report	1
1	HFC Reclaimers	Submit quarterly report	4
		Submit annual inventory report (part of quarterly 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 (part of quarterly 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		Submit biannual report	2
1	Application-Specific Allowance Holders	Submit annual report (part of biannual report)	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
<b>Annual Total</b>			
<b>3 Year Total</b>			
<b>Annual Average</b>			

#### Respondent Burden

\$141.75/Hour
\$102.86/Hour

\$48.98 is the hourly wage rate for administrative services and facilities managers, derived from Bureau of Labor Statistics Occupational Outlook Handbook, September, 2023.

<https://www.bls.gov/ooh/management/administrative-services-managers.htm>  
The rate was then increase by 110% for fringe and benefit.

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The rate was then increase by 110% for fringe and benefit.

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	\$14,175	\$0	1	1	1	1
6.0	0	24.0	\$3,402	\$0	10	10	10	40
20.0	0	20.0	\$2,835	\$0	10	10	10	10
0.0	100	100.0	\$10,286	\$50	10	10	10	10
12.0	0	12.0	\$1,701	\$50	4	4	4	4
0.3	0	0.5	\$71	\$0	4	4	4	8
2.0	0	2.0	\$284	\$0	1	1	1	1
3.0	0	12.0	\$1,701	\$0	1	1	1	4
2.0	0	2.0	\$284	\$0	1	1	1	1
6.0	0	24.0	\$3,402	\$0	75	75	75	300
10.0	0	10.0	\$1,418	\$0	75	75	75	75
0.0	100	100.0	\$10,286	\$50	75	75	75	75
2.0	0	84.0	\$11,907	\$0	2	2	2	84
6.0	0	30.0	\$4,253	\$0	2	2	2	10
0.3	0	25.0	\$3,544	\$0	75	75	75	7,500
0.3	0	1.3	\$177	\$0	2	2	2	10
0.0	20	20.0	\$2,057	\$50	2	2	2	2
2.0	0	2.0	\$284	\$0	2	2	2	2
2.0	0	2.0	\$284	\$0	75	75	75	75
1.0	0	4.0	\$567	\$0	1	1	1	4
0.0	1	1.0	\$103	\$50	10	10	10	10
0.0	20	20.0	\$2,057	\$50	5	5	5	5
0.0	20	20.0	\$2,057	\$50	100	100	100	100
6.0	0	24.0	\$3,402	\$0	26	26	26	104
10.0	0	10.0	\$1,418	\$0	26	26	26	26
0.0	20	20.0	\$2,057	\$50	4	4	4	4
6.0	0	96.0	\$13,608	\$0	16	16	16	256
1.0	0	4.0	\$567	\$0	1	1	1	4
6.0	0	18.0	\$2,552	\$0	3	3	3	9
2.0	0	6.0	\$851	\$0	3	3	3	9
2.0	0	8.0	\$1,134	\$0	3	3	3	12
0.0	20	20.0	\$2,057	\$50	3	3	3	3
100.0	0	100.0	\$14,175	\$0	1	1	1	1
4.0	0	4.0	\$567	\$0	10	10	10	10
0.0	20	20.0	\$2,057	\$50	10	10	10	10
2.0	0	2.0	\$284	\$0	10	10	10	10
2.0	0	2.0	\$284	\$0	10	10	10	10
100.0	0	100.0	\$14,175	\$0	1	1	1	1
4.0	0	4.0	\$567	\$0	3	3	3	3
0.0	20	20.0	\$2,057	\$50	3	3	3	3
2.0	0	2.0	\$284	\$0	3	3	3	3

[illegible]

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	\$14,175	\$14,175	\$14,175
40	40	240	240	240	\$34,020	\$34,020	\$34,020
10	10	200	200	200	\$28,350	\$28,350	\$28,350
10	10	1,000	1,000	1,000	\$102,860	\$102,860	\$102,860
4	4	48	48	48	\$6,804	\$6,804	\$6,804
8	8	2	2	2	\$284	\$284	\$284
1	1	2	2	2	\$284	\$284	\$284
4	4	12	12	12	\$1,701	\$1,701	\$1,701
1	1	2	2	2	\$284	\$284	\$284
300	300	1,800	1,800	1,800	\$255,150	\$255,150	\$255,150
75	75	750	750	750	\$106,313	\$106,313	\$106,313
75	75	7,500	7,500	7,500	\$771,450	\$771,450	\$771,450
84	84	168	168	168	\$23,814	\$23,814	\$23,814
10	10	60	60	60	\$8,505	\$8,505	\$8,505
7,500	7,500	1,875	1,875	1,875	\$265,781	\$265,781	\$265,781
10	10	3	3	3	\$354	\$354	\$354
2	2	40	40	40	\$4,114	\$4,114	\$4,114
2	2	4	4	4	\$567	\$567	\$567
75	75	150	150	150	\$21,263	\$21,263	\$21,263
4	4	4	4	4	\$567	\$567	\$567
10	10	10	10	10	\$1,029	\$1,029	\$1,029
5	5	100	100	100	\$10,286	\$10,286	\$10,286
100	100	2,000	2,000	2,000	\$205,720	\$205,720	\$205,720
104	104	624	624	624	\$88,452	\$88,452	\$88,452
26	26	260	260	260	\$36,855	\$36,855	\$36,855
4	4	80	80	80	\$8,229	\$8,229	\$8,229
256	256	1,536	1,536	1,536	\$217,728	\$217,728	\$217,728
4	4	4	4	4	\$567	\$567	\$567
9	9	54	54	54	\$7,655	\$7,655	\$7,655
9	9	18	18	18	\$2,552	\$2,552	\$2,552
12	12	24	24	24	\$3,402	\$3,402	\$3,402
3	3	60	60	60	\$6,172	\$6,172	\$6,172
1	1	100	100	100	\$14,175	\$14,175	\$14,175
10	10	40	40	40	\$5,670	\$5,670	\$5,670
10	10	200	200	200	\$20,572	\$20,572	\$20,572
10	10	20	20	20	\$2,835	\$2,835	\$2,835
10	10	20	20	20	\$2,835	\$2,835	\$2,835
1	1	100	100	100	\$14,175	\$14,175	\$14,175
3	3	12	12	12	\$1,701	\$1,701	\$1,701
3	3	60	60	60	\$6,172	\$6,172	\$6,172
3	3	6	6	6	\$851	\$851	\$851

1	1	100	100	100	\$14,175	\$14,175	\$14,175
4	4	24	24	24	\$3,402	\$3,402	\$3,402
-	-	0	0	0	\$0	\$0	\$0
124	124	1,166	1,166	1,166	\$165,224	\$165,224	\$165,224
31	31	310	310	310	\$43,943	\$43,943	\$43,943
31	31	1,860	1,860	1,860	\$191,320	\$191,320	\$191,320
50	50	1,000	1,000	1,000	\$102,860	\$102,860	\$102,860
16	16	150	150	150	\$21,319	\$21,319	\$21,319
4	4	40	40	40	\$5,670	\$5,670	\$5,670
4	4	160	160	160	\$16,458	\$16,458	\$16,458
33	33	198	198	198	\$28,067	\$28,067	\$28,067
1	1	6	6	6	\$851	\$851	\$851
1	1	6	6	6	\$851	\$851	\$851
5	5	30	30	30	\$4,253	\$4,253	\$4,253
92	92	552	552	552	\$78,246	\$78,246	\$78,246
54	54	324	324	324	\$45,927	\$45,927	\$45,927
92	92	552	552	552	\$78,246	\$78,246	\$78,246
92	92	184	184	184	\$26,082	\$26,082	\$26,082
46	46	3,680	3,680	3,680	\$378,525	\$378,525	\$378,525
8	8	48	48	48	\$6,804	\$6,804	\$6,804
1	1	90	90	90	\$12,758	\$12,758	\$12,758
162	162	6,480	6,480	6,480	\$918,540	\$918,540	\$918,540
<b>9,661</b>	<b>9,661</b>	<b>36,248</b>	<b>36,248</b>	<b>36,248</b>	<b>\$4,447,785.63</b>	<b>\$4,447,785.63</b>	<b>\$4,447,785.63</b>
<b>28,983</b>		<b>108,743</b>			<b>\$13,343,357</b>		
<b>9,661</b>		<b>36,248</b>			<b>\$4,447,786</b>		



Total O&M Costs per Year	Total Cost per Year		
	Y1	Y2	Y3
\$0	\$14,175	\$14,175	\$14,175
\$0	\$34,020	\$34,020	\$34,020
\$0	\$28,350	\$28,350	\$28,350
\$500	\$103,360	\$103,360	\$103,360
\$200	\$7,004	\$7,004	\$7,004
\$0	\$284	\$284	\$284
\$0	\$284	\$284	\$284
\$0	\$1,701	\$1,701	\$1,701
\$0	\$284	\$284	\$284
\$0	\$255,150	\$255,150	\$255,150
\$0	\$106,313	\$106,313	\$106,313
\$3,750	\$775,200	\$775,200	\$775,200
\$0	\$23,814	\$23,814	\$23,814
\$0	\$8,505	\$8,505	\$8,505
\$0	\$265,781	\$265,781	\$265,781
\$0	\$354	\$354	\$354
\$100	\$4,214	\$4,214	\$4,214
\$0	\$567	\$567	\$567
\$0	\$21,263	\$21,263	\$21,263
\$0	\$567	\$567	\$567
\$500	\$1,529	\$1,529	\$1,529
\$250	\$10,536	\$10,536	\$10,536
\$5,000	\$210,720	\$210,720	\$210,720
\$0	\$88,452	\$88,452	\$88,452
\$0	\$36,855	\$36,855	\$36,855
\$200	\$8,429	\$8,429	\$8,429
\$0	\$217,728	\$217,728	\$217,728
\$0	\$567	\$567	\$567
\$0	\$7,655	\$7,655	\$7,655
\$0	\$2,552	\$2,552	\$2,552
\$0	\$3,402	\$3,402	\$3,402
\$150	\$6,322	\$6,322	\$6,322
\$0	\$14,175	\$14,175	\$14,175
\$0	\$5,670	\$5,670	\$5,670
\$500	\$21,072	\$21,072	\$21,072
\$0	\$2,835	\$2,835	\$2,835
\$0	\$2,835	\$2,835	\$2,835
\$0	\$14,175	\$14,175	\$14,175
\$0	\$1,701	\$1,701	\$1,701
\$150	\$6,322	\$6,322	\$6,322
\$0	\$851	\$851	\$851

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Year
Year 1
Year 2
Year 3
Annual Average

Total Hours/Year
Reporting
Recordkeeping

Third-party

1,020,800.00

\$0	\$14,175	\$14,175	\$14,175	1
\$0	\$3,402	\$3,402	\$3,402	1
\$0	\$0	\$0	\$0	1
\$0	\$165,224	\$165,224	\$165,224	1
\$0	\$43,943	\$43,943	\$43,943	1
\$1,550	\$192,870	\$192,870	\$192,870	2
\$2,500	\$105,360	\$105,360	\$105,360	2
\$0	\$21,319	\$21,319	\$21,319	1
\$0	\$5,670	\$5,670	\$5,670	1
\$200	\$16,658	\$16,658	\$16,658	2
\$0	\$28,067	\$28,067	\$28,067	1
\$0	\$851	\$851	\$851	1
\$0	\$851	\$851	\$851	1
\$0	\$4,253	\$4,253	\$4,253	1
\$0	\$78,246	\$78,246	\$78,246	1
\$0	\$45,927	\$45,927	\$45,927	1
\$0	\$78,246	\$78,246	\$78,246	1
\$0	\$26,082	\$26,082	\$26,082	3
\$2,300	\$380,825	\$380,825	\$380,825	2
\$0	\$6,804	\$6,804	\$6,804	1
\$0	\$12,758	\$12,758	\$12,758	1
\$1,020,600	\$1,939,140	\$1,939,140	\$1,939,140	1
<b>\$1,038,450.00</b>	<b>\$5,486,235.63</b>	<b>\$5,486,235.63</b>	<b>\$5,486,235.63</b>	
<b>\$3,115,350</b>	<b>\$16,458,707</b>			
<b>\$1,038,450</b>	<b>\$5,486,236</b>			



Total Responses	Total Hours	Total Labor Costs	Total O&M Costs	Total Costs
9,661	36,248	\$4,447,786	\$1,038,450	\$5,486,236
9,661	36,248	\$4,447,786	\$1,038,450	\$5,486,236
9,661	36,248	\$4,447,786	\$1,038,450	\$5,486,236
9,661	36,248	\$4,447,786	\$1,038,450	\$5,486,236

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
			35,970

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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	\$60.54 is the hourly wage rate for professional and
\$127.13	\$47.73 is the hourly wage rate for administrative services and facilities managers, derived from
\$100.23	Bureau of Labor Statistics Occupational Outlook Handbook, April, 2022.
	<a href="https://www.bls.gov/ooh/management/administrative-services-managers.htm">https://www.bls.gov/ooh/management/administrative-services-managers.htm</a>
	The rate was then increase by 110% for fringe and benefit.

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	\$1,701	\$0	1	1	1	4	4
0	2.0	\$284	\$0	1	1	1	1	1
1	1.0	\$103	\$0	10	10	10	10	10
0	6.0	\$851	\$0	8	8	8	8	8
0	18.0	\$2,552	\$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	
	Y1	Y2	Y3	Y1	Y2	Y3		Y1	Y2
4	12	12	12	\$1,701	\$1,701	\$1,701	\$0	\$1,701	\$1,701
1	2	2	2	\$284	\$284	\$284	\$0	\$284	\$284
10	10	10	10	\$1,029	\$1,029	\$1,029	\$0	\$1,029	\$1,029
8	48	48	48	\$6,804	\$6,804	\$6,804	\$0	\$6,804	\$6,804
1	90	90	90	\$12,758	\$12,758	\$12,758	\$0	\$12,758	\$12,758
								<b>\$22,575</b>	<b>\$22,575</b>

per Year
Y3
\$1,701
\$284
\$1,029
\$6,804
\$12,758
\$22,575

Prior ICR (2024 Allocation Rule)

Year	Total Responses	Total Hours	Total Labor Costs	Total O&M Costs	Total Costs
Year 1 (2024)	9,637	36,086	\$4,110,344	\$1,028,100	\$5,138,444
Year 2 (2025)	9,637	36,086	\$4,110,344	\$1,028,100	\$5,138,444
Year 3 (2026)	9,637	36,086	\$4,110,344	\$1,028,100	\$5,138,444

This ICR

Year	Total Responses	Total Hours	Total Labor Costs	Total O&M Costs	Total Costs
Year 1 (2026)	9,661	36,248	\$4,447,786	\$1,038,450	\$5,486,236
Year 2 (2027)	9,661	36,248	\$4,447,786	\$1,038,450	\$5,486,236
Year 3 (2028)	9,661	36,248	\$4,447,786	\$1,038,450	\$5,486,236
Annual Average	9,661	36,248	\$4,447,786	\$1,038,450	\$5,486,236

Difference relative to Adjusted Prior ICR

Year	Total Responses	Total Hours	Total Labor Costs	Total O&M Costs	Total Costs
Year 1 (2026)	24	162	\$337,442	\$10,350	\$347,792
Year 2 (2027)	NA	NA	NA	NA	NA
Year 3 (2028)	NA	NA	NA	NA	NA

## 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	From 2024 OPM hourly base
Technical Rate	GS 13 Step 1	From 2024 OPM hourly base
Clerical Rate	Standard Government	From 2024 OPM hourly table for DC region:
Extramural Rate	Standard Government t Benefits Multiplier	https://www.opm.gov/policy-procedures/salary-wages/salary-tables/24Table/DCB_k.aspx
		Source: Based on average rate for Senior Technician III and Consultant I on contract 68HERH19DC (contract period 5)





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
\$1,068	\$1,068	\$1,068
\$0	\$0	\$0
\$503	\$503	\$503
\$1,182	\$1,182	\$1,182
\$943	\$943	\$943
\$2,036	\$2,036	\$2,036
\$0	\$0	\$0
\$503	\$503	\$503
\$5,028	\$5,028	\$5,028
\$106	\$106	\$106
\$30,168	\$30,168	\$30,168
\$2,514	\$2,514	\$2,514
\$5,028	\$5,028	\$5,028
\$49,078	\$49,078	\$49,078
\$147,235		
\$49,078		

pay table for DC region:

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Technical Cost			Clerical Cost			Contractor Cost		
Y1	Y2	Y3	Y1	Y2	Y3	Y1	Y2	Y3
\$7,687	\$7,687	\$7,687	\$0	\$0	\$0	\$11,656	\$11,656	\$11,656
\$34,646	\$34,646	\$34,646	\$0	\$0	\$0	\$79,604	\$79,604	\$79,604
\$1,809	\$1,809	\$1,809	\$0	\$0	\$0	\$2,743	\$2,743	\$2,743
\$8,500	\$8,500	\$8,500	\$0	\$0	\$0	\$6,445	\$6,445	\$6,445
\$6,782	\$6,782	\$6,782	\$0	\$0	\$0	\$0	\$0	\$0
\$29,299	\$29,299	\$29,299	\$0	\$0	\$0	\$88,860	\$88,860	\$88,860
\$7,234	\$7,234	\$7,234	\$0	\$0	\$0	\$10,970	\$10,970	\$10,970
\$5,426	\$5,426	\$5,426	\$0	\$0	\$0	\$16,456	\$16,456	\$16,456
\$67,823	\$67,823	\$67,823	\$0	\$0	\$0	\$246,834	\$246,834	\$246,834
\$1,899	\$1,899	\$1,899	\$0	\$0	\$0	\$1,152	\$1,152	\$1,152
\$452,150	\$452,150	\$452,150	\$0	\$0	\$0	\$205,695	\$205,695	\$205,695
\$7,234	\$7,234	\$7,234	\$0	\$0	\$0	\$10,970	\$10,970	\$10,970
\$9,043	\$9,043	\$9,043	\$0	\$0	\$0	\$27,426	\$27,426	\$27,426
<b>\$639,533</b>	<b>\$639,533</b>	<b>\$639,533</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$708,811</b>	<b>\$708,811</b>	<b>\$708,811</b>
<b>\$1,918,598</b>			<b>\$0</b>			<b>\$2,126,434</b>		
<b>\$639,533</b>			<b>\$0</b>			<b>\$708,811</b>		



Total Cost		
Y1	Y2	Y3
\$20,411	\$20,411	\$20,411
\$114,250	\$114,250	\$114,250
\$5,054	\$5,054	\$5,054
\$16,127	\$16,127	\$16,127
\$7,725	\$7,725	\$7,725
\$120,196	\$120,196	\$120,196
\$18,205	\$18,205	\$18,205
\$22,384	\$22,384	\$22,384
\$319,685	\$319,685	\$319,685
\$3,157	\$3,157	\$3,157
\$688,013	\$688,013	\$688,013
\$20,719	\$20,719	\$20,719
\$41,497	\$41,497	\$41,497
\$1,397,422	\$1,397,422	\$1,397,422
\$4,192,267		
\$1,397,422		

Year	Total Hours	Total Costs
Year 1	12,631	\$1,397,422
Year 2	12,631	\$1,397,422
Year 3	12,631	\$1,397,422
Annual Average	12,631	\$1,397,422

Respondent + EPA Avg                      \$6,883,658