

**Record of Consultations Between the U.S. Environmental Protection Agency and  
Respondents to the Information Collection Request:  
“Pesticide Registration Fee Waivers”  
(Consultations conducted in June, 2006)**

1. Jim Kunstman; PBI/Gordon
2. Jim Messina; Exponent, Agent for SePro and Ajay North America
3. Terry Pizzarello; Falcon Labs
4. Judith Thompson; Hacco Inc.

**Company Name:** PBI/Gordon  
**Name of person consulted:** Jim Kunstman  
**Date:** 6/2006

**Q: When preparing your waiver request did you consult the Questions and Answers on the EPA website?**

A: Yes, though less often as a result of experience

**Q: If yes, did you find it helpful and informative?**

A: Yes

**Q: What improvements or clarifications would you like to see?**

A: No suggestions at this time.

**Q: Are you aware of the industry generated form?**

A: Yes. Assisted in generating it.

**Q: Would you use the industry generated form? If no, why not?**

Uses the industry generated form on the web.

Labor Rates:

**Q: Would you say the following labor rates are accurate?**

\$130/hr management; \$88/hr technical staff; \$40/hr clerical – estimates for management and technical staff are reasonable. The estimate for clericals in the company's regulatory staff when considering benefits may be low and \$50/hr may be more accurate.

•The agency methodology for estimating the cost and burden associated with the paperwork involved with preparing your waiver request is the following

**Management: reading and comprehending the regulations, planning activities to submit the waiver request: 10 hrs; Subsequent submissions: 2 hrs**

The first submission during a maintenance fee billing cycle probably requires 12 hours of management time to gather documents and information. Subsequent submissions during a maintenance fee cycle do not require management time. The company has an electronic system to generate pesticide sales information. The first application in the 2006 cycle was complex due to additional financial information to support average global pesticide sales of less than \$60 million.

**Technical: locating and preparing copies of taxes, audits, payroll account statements, any market analysis, etc.? 40 hrs; Subsequent submissions 40 hrs**

Subsequent submissions in a maintenance fee cycle take 1 hour to prepare because of the company's automated systems.

**Clerical: preparing the submission 10 hrs; Subsequent submissions 10hrs**

Clerical assistance is not used because financial and personnel information are kept at the management level.

**Q: Did we miss anything?**

**Comments:**

Mr. Kunstman asked about the electronic notification of fee payment. His observation was that after the move, the Agency's system was not notifying registrants of payments.

Mr. Kunstman also observed that fee waivers were being processed in less time than previously.

**Company Name:** Exponent, Agent for SePro and Ajay North America  
**Name of person consulted:** Jim Messina  
**Date:** 6/2006

**Q: When preparing your waiver request did you consult the Questions and Answers on the EPA website?**

A: Yes

**Q: If yes, did you find it helpful and informative?**

A: Yes

**Q: What improvements or clarifications would you like to see?**

A: The overheads from a presentation on fee waivers during a 2004 PRIA workshop are hard to find. It defined the criteria for a 50% and 100% waiver.

**Q: Are you aware of the industry generated form?**

A: Yes

**Q: Would you use the industry generated form? If no, why not?**

Uses own with the same information and on company letterhead.

Labor Rates:

**Q: Would you say the following labor rates are accurate?**

\$130/hr management; \$88/hr technical staff; \$40/hr clerical

As a consulting firm, charges are \$175/hr management, \$100/hr technical, and considering the level of clerical expertise, \$65/hr clerical.

•The agency methodology for estimating the cost and burden associated with the paperwork involved with preparing your waiver request is the following :

**Management: reading and comprehending the regulations, planning activities to submit the waiver request: 10 hrs; Subsequent submissions: 5 hrs**

**Technical: locating and preparing copies of taxes, audits, payroll account statements, any market analysis, etc.: 40 hrs; Subsequent submissions 40 hrs**

**Clerical: preparing the submission 10 hrs; Subsequent submissions 10hrs**

The first application took the most time. Most of the hours were at the technical level. Management spends about 2 to 3 hours in directing and reviewing the work on the first fee waiver submission. The remainder of the work is generally performed by technical staff. Since a portion of the work is conducted by the client company, the amount of clerical time varies substantially and consequently difficult to estimate. Between Mr. Messina's consulting firm and the client company, approximately 4 hours were spent on reading regulations and obtaining the tax information, 1 to 4 hours copying the information and putting together the submission, 1 to 4

hours by the client filing the information, and 1-6 hours to respond to any questions from the Agency.

Subsequent applications in the same year took less time, as the information was copied. At most 5 to 6 hours. The first fee waiver in a maintenance fee billing cycle takes about as much time as the first fee waiver submission.

**Q: Did we miss anything?**

**Comments:**

Clients from smaller companies required more time to obtain information because they may have neither filing systems nor support staff.

**Company Name:** Falcon Labs  
**Name of person consulted:** Terry Pizzarello  
**Date:** 6/16/2006

**Q: When preparing your waiver request did you consult the Questions and Answers on the EPA website?**

A: Yes

**Q: If yes, did you find it helpful and informative?**

A: Yes

**Q: What improvements or clarifications would you like to see?**

**Q: Are you aware of the industry generated form?**

A: Yes.

**Q: Would you use the industry generated form? If no, why not?**

A; Yes

Labor Rates:

**Q: Would you say the following labor rates are accurate?**

\$130/hr management; \$88/hr technical staff; \$40/hr clerical

Company is a small family operated company with no clerical staff. First pesticide application.

**Management: reading and comprehending the regulations, planning activities to submit the waiver request: 10 hrs; Subsequent submissions: 2 hrs**

Most of the work was done by the company Vice-President, Ms. Pizzarello. She spent about 20 minutes reading the material on the web site. Spent about 1 hour with a pesticide consultant at \$150/hr who answered those questions that could not be answered from the web site. Her accountant spent about an hour collecting the financial information. She estimates that she spent a total of five hours on preparing and mailing the application.

**Technical: locating and preparing copies of taxes, audits, payroll account statements, any market analysis, etc.? 40 hrs; Subsequent submissions 40 hrs**

All work was performed by management.

**Clerical: preparing the submission 10 hrs; Subsequent submissions 10hrs**

Company used no clerical support.

**Q: Did we miss anything?**

**Comments:**

It was a simple process for the company.

**Company Name:** Hacco Inc.

**Name of person consulted:** Judith Thompson

**Date:** 6/16/2006

**Q: When preparing your waiver request did you consult the Questions and Answers on the EPA website?**

A: Obtained information on the process from another company. Company submitted their only fee waiver application in 2005.

**Q: If yes, did you find it helpful and informative?**

A: Since the Ms. Thompson was not familiar with the process, the fee waiver application was submitted in response to the Agency's bill or fee invoice.

**Q: What improvements or clarifications would you like to see?**

A: Ms. Thompson would like to be able to find information on fee categories or action codes and what needs to be submitted for a small business easily on the web. She had to pull the information from different web locations.

**Q: Are you aware of the industry generated form?**

A: Yes. Used some of it and submitted a certification from their Chief Financial Officer.

**Q: Would you use the industry generated form? If no, why not?**

Addressed the same questions - CFO signed certification

Labor Rates:

**Q: Would you say the following labor rates are accurate?**

\$130/hr management; \$88/hr technical staff; \$40/hr clerical

Salary and benefits for technical staff are closer to \$65/hr. For clerical staff \$40/hr is in the ballpark, though \$30/hr would also be reasonable.

**Management: reading and comprehending the regulations, planning activities to submit the waiver request: 10 hrs; Subsequent submissions: 2 hrs**

Management took 10 to 12 hours.

**Technical: locating and preparing copies of taxes, audits, payroll account statements, any market analysis, etc.? 40 hrs; Subsequent submissions 40 hrs**

Technical staff took 35 hours which included all clerical duties.

**Clerical: preparing the submission 10 hrs; Subsequent submissions 10hrs**

No clericals – the company has minimum clerical staff.

**Q: Did we miss anything?**

**Comments:**

Ms. Thompson went to the web site to find where to send her applications. The web site for the interpretations of the fee categories and guidance on small businesses were forwarded to her.