

**SUPPORTING STATEMENT FOR AN  
INFORMATION COLLECTION REQUEST**

**1. IDENTIFICATION OF THE INFORMATION COLLECTION**

**1(a) Title of the Information Collection**

TITLE: Recordkeeping Requirements for Certified Applicators Using 1080 Collars for Livestock Protection

OMB NO. 2070-0074

EPA No. 1249.08

**1(b) Short Characterization/Abstract**

This information collection request (ICR) is a proposed renewal of an existing ICR that is currently approved by OMB and is due to expire on May 31, 2007. This information collection activity enables the Environmental Protection Agency (EPA) to obtain the information needed to track the use of registered 1080 collars and the record keeping requirements imposed by an administrative judge in October 1982 and confirmed by the Agency in 1983. This ICR affects four States (Montana, New Mexico, South Dakota, and Wyoming) that monitor the program plus one additional registrant. Applicators who are certified to apply livestock protection collars are required to keep records of: a) number of collars purchased; b) number of collars attached on livestock; c) pasture(s) where collared livestock were placed; d) number and locations of livestock found with ruptured or punctured collars and the apparent cause of the damage; e) the dates of each attachment, inspection, and removal; f) number, dates, and approximate location of all collars lost; g) locations, and dates of all suspected poisonings of humans, domestic animals or non-target wild animals resulting from collar use location and species data on each animal poisoned as an apparent result of the toxic collar. This Supporting Statement pertains to monitoring activities associated with collar use and to the preparation and submission of an annual monitoring report to EPA that are over and above requirements that are either conditions of registration or obligations associated with the handling and regulation of any restricted use pesticide product.

Applicators maintain records, and the registrants/lead agencies do monitoring studies and submit the reports. These records are monitored by either the: a) State lead agencies or b) registrants. EPA receives annual monitoring reports from registrants or State lead agencies.

**2. NEED FOR AND USE OF THE COLLECTION**

**2(a) Need/Authority for the Collection**

The Administrator of the EPA banned all predator uses of Sodium Monofluoroacetate (Compound 1080) in 1972. In 1981 and 1982, EPA received applications to register 1080 in several delivery mechanisms, one of which was the toxic collar. Following extensive public hearings in 1982, EPA's Administrative Law Judge Nissen declared, on October 22, 1982, that the Agency could register the collar, with certain specific use restrictions, after going through the normal registration process. The Administrative Law Judge included restrictions and

recordkeeping requirements in Attachment C of his initial decision. On October 31, 1983, then EPA Assistant Administrator Lee M. Thomas affirmed Judge Nissen's initial decision, including the use restrictions and recordkeeping requirements.

Prior to 1972, 1080 was used for predator control in a number of ways, some of which were subject to the 1982 proceedings, which either did not receive a favorable ruling from the Administrative Law Judge or were not subsequently registered for other reasons. As there have been occasional reports of predator control use and other uses of 1080 by illegal methods subsequent to 1972, EPA believes that it is extremely important to account for the 1080 that is supplied for legal use so as to maintain surveillance on the toxic collar program and to deter diversion of 1080 in the program from legal to illegal predator control use. As 1080 is a highly soluble material of potent but delayed oral toxicity, there are additional concerns about transfer of this material to persons who might use or threaten to use it as a weapon of terrorism.

### **2(b) Practical Utility/Users of the Data**

As a condition of the 1080 livestock protection collar registration, EPA has required submission of annual reports monitoring use of all livestock protection collar products. Depending upon the product, the registrant or the State lead agency for pesticide regulation is designated as being responsible for submitting an annual monitoring report. The requirement to submit reports is imposed for at least the first four years of the collars' use under the registration. Factors affecting the extension of requirements to submit annual reports include: 1) quality of reports submitted previously; 2) amount of use reported; 3) results of collar use (in terms of numbers punctured by coyotes, numbers punctured by other causes, numbers lost, nontarget poisonings, etc.); 4) frequency and nature of violations reported; and 5) arrangements made between EPA and registrants regarding annual reports of collar use to meet other requirements for reporting information. EPA reviews the annual reports to assess compliance with the 1982 Administrative Law decision and the requirements of product labeling.

## **3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

### **3(a) Nonduplication**

The processes for recordkeeping, reporting nontarget exposure incidents, and submitting monitoring reports are not duplicative of any other known information collection requirement. This information would not be compiled or reported but for these special requirements for livestock protection collars. While certain information on collar production may be required by agencies that prepare monitoring reports, this information would not, in the main, be duplicative of the confidential production reports that all pesticide registrants must file. The reports are limited to one specific, heavily regulated product and represent the most efficient means for others to generate and EPA to receive this information. This information may not, in all cases, be available to the State lead agencies but for the specific reporting requirements that they impose upon registrants of 1080 livestock protection collars.

### **3(b) Public Notice Required Prior to ICR submission to OMB**

In proposing to renew this ICR, EPA published a Federal Register Notice on October 25, 2006 (71 FR 62434) (Attachment B) and provided a 60-day public notice and comment period. The Agency received one public comment from an entity that strongly encouraged EPA to maintain confidentiality of the certified applicators, their addresses or other personal information contained within any report made to the Agency. Since this public comment did not provide information related to the burden estimates and did not contest the renewal of this ICR, no adjustments were made to the ICR based on these comments. EPA also engaged in consultation with stakeholders as listed in section 3(c) of this supporting statement.

### **3(c) Consultations**

In addition to the public notice that EPA published in the Federal Register concerning the renewal of this ICR, the Agency consulted, as required under 5 CFR 1320.8(d)(1), with stakeholders who actively interact with the Agency through the use of this collection instrument. EPA staff contacted three relevant stakeholders and asked them for their assessment of the regulatory burden estimates expressed by the Agency in this ICR. EPA consulted with the following individuals:

Kenneth Dial  
USDA/APHIS  
4700 Riverdale Road  
Riverdale, MD 20737-1237  
301-734-8378

Henry Uhden  
Wyoming Department of Agriculture  
Cheyenne, WY  
307-777-6674

Bonnie Rabe  
New Mexico Department of Agriculture  
Las Cruces, NM

Where applicable, the respondents indicated that the burden and labor cost estimates, as stated in the ICR, were reasonable and accurate. The consultation feedback was utilized during the renewal period for this information collection. A copy of the general questions (Attachment D) and record of consultations and communications (Attachment E) are included in this supporting statement.

### **3(d) Effects of Less Frequent Collection**

Annual monitoring reports are the only items pertaining to collars for which EPA requires scheduled submissions. Longer intervals between submissions would make the information received and EPA's responses to the reports less timely. Longer intervals likely also would increase the amount of time that would be needed to prepare each individual report. Reports submitted to date have been as short as a one-page letter and as long as several pages of text followed by several pages of tables and/or other attachments. Data collection and table preparation appear to be the major burdens associated with monitoring reports.

### **3(e) General Guidelines**

Requiring monitoring reports to be submitted once a year does not conflict with the general guidelines for data requesters. The required reporting of nontarget incidents, in practice, has not generated any rate of submissions that could be construed as being in violation of these general guidelines. The need for such incidents to be reported rapidly is clear, however. As discussed below in Section 5(c) of this ICR, the reporting requirements for small entities have been limited as much as is legally and responsibly possible.

### **3(f) Confidentiality**

Health and safety data submitted by registrants under FIFRA are considered by EPA to contain no confidential business information (CBI). If registrants submit data that relates to trade secrets or commercial or financial information, such information is protected from disclosure under Section 10 of FIFRA. Confidential data submitted by registrants to EPA in response to this particular information collection activity, it will be handled strictly in accordance with provisions of the FIFRA Confidential Business Security Manual. This manual contains instructions relative to all contact with confidential documents, including: responsibilities of the EPA employees; physical security measures; CBI copying and destruction procedures; transfer of CBI materials within the EPA to contractors or other government offices; computer security; CBI typing procedures; and procedures internal to EPA. The manual dictates that all CBI must be marked or flagged as such, all CBI must be kept in secure (double-locked) areas, and all CBI intended to be destroyed must be cleared by a Document Control Officer and shredded.

### **3(g) Sensitive Questions**

No information of a sensitive or private nature is requested in conjunction with this information collection activity. Further, this information collection activity complies with the provisions of the Privacy Act of 1974 and OMB Circular A-108. The names and addresses of both certified livestock protection collar applicators and any other person who owns property on which livestock protection collars have been or will be applied by a certified applicator are considered personal information that will not be disclosed if ever in the possession of EPA. Unsolicited information of a sensitive or private nature included in monitoring reports already received, or submitted in the future, will be protected from public release, in accordance with 7 USC 136i-1(b).

## **4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

### **4(a) Respondents/NAICS Codes**

This information collection activity applies to all certified pesticide applicators that apply 1080 collars, to the pesticide manufacturer's whose products include 1080 collars, and to the government agencies responsible for implementing and administering a 1080 collar monitoring program. Information available to EPA indicates that most, if not all, of the certified applicators subject to this ICR are employees of the Animal and Plant Health Inspection Service (APHIS) within the US Department of Agriculture (USDA), although a small number of other certified

applicators may also apply 1080 collars. The North American Industrial Classification System codes assigned to the businesses and other institutions participating in this program are 325320 (Pesticide and other Agricultural Chemical Manufacturing), 926140 (Regulation of Agricultural Marketing and Commodities) and 9241 (Administration of Environmental Quality Control Programs).

#### **4(b) Information Requested**

##### **4(b)(i) Data Items, Including Record Keeping Requirements**

The data that certified livestock protection collar applicators are required to record and maintain were outlined in the Initial Decision of the Administrative Law Judge in the 1080 Predicide Hearings. This decision was upheld and amplified in the Final Decision rendered by Lee Thomas, acting for then EPA Administrator William Ruckelshaus. Administrator Ruckelshaus recused himself from the decision due to his earlier involvement in the 1972 decision, leading to the cancellation of predacidal uses of Compound 1080. These requirements are stipulated in "Use Restriction 5" in the technical bulletin that is part of the labeling for all livestock protection collar products registered as pesticides in the United States. Use Restriction 5, from a typical technical bulletin, reads as follows:

"Each applicator shall keep records dealing with the use of livestock protection collars and the results of such use. Records shall be maintained in accordance with appropriate State or Federal regulations but for not less than two years following disposal or loss of collars. Such records shall include, but need not be limited to:

- (vvvvvvvvvvvvvvvvvv) The number of collars attached on livestock.
- (wwwwwwwwwwwwwwwwww) The pasture(s) where collared livestock were placed.
- (xxxxxxxxxxxxxxxxxxx) The dates of each attachment, inspection, and removal.
- (yyyyyyyyyyyyyyyyyy) The number and locations of livestock found with ruptured or punctured collars and the apparent cause of the damage.
- (zzzzzzzzzzzzzzzzzz) The number, dates, and approximate location of all collars lost.
- (aaaaaaaaaaaaaaaaaaa) The species, locations, and dates of all suspected poisonings of humans, domestic animals or non-target wild animals resulting from collar use."

Use Restriction 6, from the same typical technical bulletin, requires that "suspected" poisonings of "threatened or endangered species,... humans, domestic animals or nontarget wild animals" be reported, within three days of the incident, to a designated government agency (EPA and/or the appropriate State lead agency for regulation of pesticides). EPA requires that certified applicators of livestock protection collars keep and report only those records prescribed by Use Restrictions 5 and 6.

Registrants of livestock protection collars are required, by Use Restriction 4 of the same typical technical bulletin, to:

". . . keep records of all collars sold or transferred at their address of record. Records shall include the name, address, state where livestock protection collar certification was issued, certification number of each recipient, and dates and numbers of collars sold or transferred."

Use Restriction numbers and content vary somewhat from product to product due to additional restrictions or considerations either proposed by the registrants or required by State lead agencies. The complete list of Use Restrictions can be found in Section V.B.2 of EPA's 1995 Re-registration Eligibility Decision concerning sodium fluoroacetate (see <http://www.epa.gov/oppsrrd1/REDs/3073.pdf>)

#### **4(b)(ii) Respondent Activities**

Certified livestock protection collar applicators are required by product labeling to prepare and maintain records of various activities associated with use and fate of livestock protection collars that they purchase or obtain for use. Preparing these records consists of writing down what is done in normal use and handling of collars.

The use of livestock protection collars is a labor-intensive process. For a typical sheep operation, collar use involves the following activities:

- (a) corralling sheep;
- (b) isolating target flocks;
- (c) capturing appropriate livestock and equipping them with collars;
- (d) redeploying target and main flocks in ways that are expected to direct coyotes' attacks toward target flocks and away from the remainder of the producer's sheep;
- (e) inspecting target flocks weekly (or more frequently) to account for livestock alive, dead, or missing; to search for lost sheep or lost collars; to capture livestock that require adjustments to collar position or other hands-on attention; and to properly handle and dispose of irreparably damaged collars; and, when collar use is to be terminated; corralling target flocks, capturing collared livestock, removing and inspecting collars, disposing of damaged collars, and returning intact collars to proper secure storage.

The recordkeeping requirements add the need to record significant data associated with collar use such as how many collars were used, where and when they were used, how many were damaged, likely causes of such damage, where collars went after use, and the occurrence of possible nontarget exposure incidents. The time and other costs associated with preparation and maintenance of such records are conditions of collar use which are required by the product's labeling. Such requirements are not part of the subject ICR. Burdens related to the ICR begin with the compilation of applicator's records and with activities associated with assembling data for inclusion in monitoring reports.

Registrants and/or State lead agencies have developed their own instruments that facilitate appropriate recordkeeping by certified applicators. State lead agencies typically require certified livestock protection collar applicators to file periodic reports summarizing collar use. Data from these reports are included in annual monitoring reports submitted to EPA by registrants or state lead agencies. Other data that appear in monitoring reports include

March 14, 2007

summaries of numbers of collars sold or otherwise legally circulated in the State and the number and nature of violations detected with regard to use or handling of livestock protection collars.

As with other registrants of pesticide products, livestock protection collar registrants are required to file annual (confidential) production reports. These reports are required of all establishments that produce pesticides or pesticide devices in the United States, pursuant to Section 7 of FIFRA. Since production does not equate with use, the ICR is not duplicative of the requirement to submit annual production reports.

## **5. THE INFORMATION COLLECTED - AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

### **5(a) Agency Activities**

Reports of non-target species poisonings and other incidents included in the annual monitoring reports filed with EPA by State lead agencies are reviewed by the Insecticide-Rodenticide Branch, which initiates whatever regulatory steps are warranted by the incident and places a copy of the incident report in the registration file for the product involved in the incident. To date, no nontarget poisoning incidents have been reported to EPA by State lead agencies. Reasons for this appear to be the limited extent to which collars are used, and the relatively low potential for occurrence and detection of nontarget incidents. However, EPA has noted instances of violations and inaccuracies in inventory in its reviews of monitoring reports.

EPA replies directly, in writing, to the originator of the report, indicating whether the report is acceptable, whether additional details are needed for the current report or future reports, and whether any specific corrective steps are needed based upon items discussed in the monitoring report.

### **5(b) Collection Methodology and Management**

As the number of registered livestock protection collar products is very small (6 at present) and very few reports are expected to be received, no special provisions for data collection and management are needed. The reports submitted are handled and processed through mechanisms that have been developed for handling a wide variety of submissions that pertain to registered pesticide products. These include routing the submission through the routine review process, responding to the submission in writing, and filing the submission and the response in the relevant product's registration file. These submissions are tracked by EPA's Office of Pesticide Programs Information System (OPPINS).

### **5(c) Small Entity Flexibility**

Most users, including the private company that is a livestock protection collar registrant, would qualify as small entities. The degree of imposition that these recordkeeping and reporting requirements impose on such individuals is minimal, considering the limited degree of latitude permitted by the Administrative Law Judge and the Administrator of the EPA, the extreme toxicity of Compound 1080, and the great potential for abuse of livestock protection collars should collars or their contents get into the hands of irresponsible persons. The main purpose of the recordkeeping requirements is to promote responsible use and handling. The main purpose for requiring monitoring reports is to establish a process through which it is mandatory to inform EPA of the results of collar use. EPA then can use the data from reports as bases for future



regulatory decisions.

The mandatory submission of periodic reports from applicators to State lead agencies based on data that they are already required to collect adds only a minimal amount of burden. In the State where the livestock protection collar product registered to a private firm is used, the lead agency requires the registrant to submit sales and distribution documents to the State.

#### **5(d) Collection Schedule**

As nontarget exposure incidents must be reported within three days of their occurrence there is no set schedule for collection of this information. Such reporting is required by product labeling and, therefore, is not part of this ICR. However, nontarget incidents also would be reported and discussed in monitoring reports for the year in which they occurred, with follow-up information regarding dispositions of cases being indicated.

Livestock protection collar annual monitoring reports are due on a date prescribed as a condition of registration, usually February 15, for each year after the first year in which collars may be used legally.

## **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

### **6(a) Estimating Respondent Burden**

EPA has revised the estimated burden associated with the 1080 livestock protection collar annual monitoring reports over its 2003 estimates based on the reports most recently submitted to EPA. For the next 3 years, EPA expects that 40 certified applicators (30 for New Mexico and 10 for APHIS) will use and/or possess collars annually and, consequently, contribute information to be used in monitoring reports. EPA does not expect the burden per applicator (40 hours) will decrease over the next 3 years and remains unchanged over our 2003 estimate. EPA points out that this estimate was developed under the assumption that, while perhaps unlikely, one non-target species poisoning incident will occur per year and require 10 hours of burden. In all, EPA estimates the total annual burden for certified applicators of 1080 livestock protection collars to be 1600 hours.

EPA anticipates that 3-5 registrants and/or State lead agencies will file annual monitoring reports based upon information obtained from those certified applicators. Note that, except in the case of the pesticide producer, the registrant is the State. EPA assumed for the sake of this burden analysis, as we did in 2003, that the number of entities submitting annual monitoring reports is 4. The estimated respondent burden for this activity (77 hours) over the next 3 years is unchanged over the 2003 estimates. The annual burden of the States and registrants is based on the annual monitoring report alone and not other requirements related to use, administration, and regulation of 1080 livestock protection collars. There are currently two States and one registrant that have been reporting annually on livestock protection collar use, with two other States possibly becoming involved in that activity in the future. EPA estimates the total annual burden for agencies submitting annual monitoring reports to be 308 hours.

As with other registrants of pesticide products, livestock protection collar registrants (i.e., the producer(s), not the State agencies) are required to file annual (confidential) production reports. The annual response burden for the submission of production reports is estimated to be 45 hours, and is unchanged over EPA's 2003 estimate. EPA recognizes that the time needed to prepare reports is affected primarily by the extent of use and the number of applicator's to be covered by the report during any given year.

Tables 1, 2, and 3 provide a breakdown of the collection activities per respondent and a general overview of how the estimates were derived. The total annual response burden imposed upon certified applicators, State agencies, and registrants associated with the use of 1080 livestock protection collars is estimated to be 1,953 hours.

### **6(b) Estimating Respondent Costs**

For a period of some years, when estimating labor rates for most OPP program ICR renewals, the Agency adjusted the ICR renewal labor rates by using the NASA Gross Domestic Product (GDP) Deflator Inflation Calculator to index the labor cost for a particular year. However, in July 2006, Agency economists completely re-estimated wages, benefits, and overhead for all labor categories for the pesticide industry, state government and Agency employees. The Agency analysis uses currently available information on labor rates and other benefits from publicly available websites. A copy of the methodology used to re-estimate the

labor rates and formulas used to derive the fully loaded rates and overhead costs are listed in attachment A.

To derive the labor rates for this ICR, Agency economists estimated the wages for the management, technical, and clerical labor categories using the methodology cited above. The industry respondent costs for this renewal for managerial, technical and clerical rates are estimated at \$100.86, \$64.80, and \$33.05 per hour, respectively. These labor rates are fully loaded and include benefits and overhead costs.

The state government respondent costs for this renewal for managerial, technical and clerical rates are estimated at \$71.41, \$49.38, and \$33.78 per hour, respectively. These labor rates are fully loaded and include benefits and overhead costs.

Based on EPA's methodology for estimating pesticide-related information collection request wages rates for industry, state, and EPA - and based on EPA's familiarity with the 1080 livestock protection collars program and experiences with USDA - EPA estimates the fully-loaded labor rate of a certified applicator of 1080 livestock protection collars to be approximately equal to the state government clerical labor rate of \$33.78/hr (includes the base wage rate, benefits, and overhead).

The total annual cost for all respondents associated with this information collection activity is estimated to be approximately \$70,261.59; in summary:

- Certified applicators: \$54,048
- States: \$13,773.84
- Registrants: \$2,439.75.

The annual cost for a single respondent is:

- Certified applicator: \$1,351.20
- State: \$3,443.46
- Registrant: \$487.95.

Tables 1 through 3 present information for estimating costs based on the burden hours/costs per respondent.

**Table 1. Annual Certified Applicator Burden/Cost Estimates**

	<b>Collection Activities</b>	<b>Burden Hours</b>	<b>Cost</b>
		Certified Applicator (\$33.78.38/hr)	
1.	Read/hear rule or any collection instrument	3	\$101.34
2.	Receive training <sup>1</sup>	--	--
3.	Plan activities	3	\$101.34
4.	Create information	3	\$101.34
5.	Gather information	18	\$608.04
6.	Process and review information for accuracy	5	\$168.90
7.	Record, disclose, or display the information	5	\$168.90
8.	Store, file or maintain the information	3	\$101.34
	<b>TOTAL</b>	<b>40</b>	<b>\$1,351.20</b>

ANNUAL BURDEN:

Hour Total (40) x Number of Respondents (40) = 1,600

ANNUAL COST:

Cost Total (\$1,351.20) x Number of Respondents (40) = \$54,048

---

<sup>1</sup> ? The burden associated with the training of certified applicators is accounted for under the ICR for the Agency Certification and Training Program (EPA ICR# 0155; OMB Control No. 2070-0029).

**Table 2. Annual State Agency Burden/Cost Estimates**

	Collection Activities	Burden Hours (per year)			Cost
		Management (\$71.41/hr)	Tech. (\$49.38/hr)	Clerical (\$33.78/hr)	
1 .	Read/hear rule or any collection instrument	0	2	0	\$98.76
2 .	Plan activities	0	10	0	\$493.80
3 .	Create information	0	15	0	\$740.70
4 .	Gather information	0	14	0	\$691.32
5 .	Process, compile, and review information for accuracy and appropriateness	0	13	0	\$641.94
6 .	Record, disclose, display or report the information	0	0	20	\$675.60
7 .	Store, file or maintain the information	0	0	3	\$101.34
	<b>TOTAL</b>	<b>0</b>	<b>54</b>	<b>23</b>	<b>\$3,443.46</b>

ANNUAL BURDEN: Hour Total (77) x Number of Respondents (4) = 308  
 ANNUAL COST: Cost Total (\$3,443.46) x Number of Respondents (4) = \$13,773.84

**Table 3. Annual Registrant Burden/Cost Estimates<sup>2</sup>**

	Collection Activities	Burden Hours (per year)			Cost
		Management (\$100.86/hr)	Tech. (\$64.80/hr)	Clerical (\$33.05/hr)	
1	Read/hear rule or any collection instrument	0	2	0	\$129.60
2	Plan activities	0	1	0	\$64.80
3	Create information	0	0	0	\$0
4	Gather information	0	2	0	\$129.60
5	Process, compile, and review information for accuracy and appropriateness	0	1	0	\$64.80
6	Record, disclose, display or report the information	0	0	2	\$66.10
7	Store, file or maintain the information	0	0	1	\$33.05
	<b>TOTAL</b>	<b>0</b>	<b>6</b>	<b>3</b>	<b>\$487.95</b>

ANNUAL BURDEN: Hour Total (9) x Number of Respondents (5) = 45

ANNUAL COST: Cost Total (\$487.95) x Number of Respondents (5) = \$2,439.75

### 6(c) Estimating Agency Burden and Cost

The Agency's total annual burden associated with the 1080 livestock program has changed based upon more accurate estimates of the resources required to complete tasks specifically associated with annual monitoring reports.

To derive the labor rates for this ICR, Agency economists estimated the wages for the management, technical, and clerical labor categories using the methodology cited above. The EPA labor rates for this renewal for managerial, technical and clerical rates are estimated at \$93.07, \$66.34, and \$47.17 per hour, respectively. These labor rates are fully loaded and include benefits and overhead costs. For this ICR, we estimate the annual burden to be 130 hours and the total annual cost to be \$8,624.

<sup>2</sup> In all but one case, the registrant is the State and, therefore, covered under State burdens (Table 2).

**Table 4. Annual Agency Burden/Cost Estimates**

	Collection Activities	Burden Hours (annual)		Cost
		Tech. (\$66.34/hr)	Clerical (\$47.17/hr)	
1.	Develop any correspondence needed	8	0	\$530.72
2.	Answer respondents' questions	2	0	\$132.68
3.	Review data submissions	10	0	\$663.40
4.	Analyze data submissions	4	0	\$265.36
5.	Store data	2	0	\$132.68
	TOTAL	26	0	\$1,724.84

ANNUAL BURDEN: Hour Total (26) x Number of Respondents (5) = 130  
ANNUAL COST: Cost Total (\$1,724.84) x Number of Respondents (5) = \$8,624.20

**6(d) Bottom Line Burden Hours and Costs****Table 5. Bottom Line Burden Hours and Costs/Master Table**

	Total Burden Hours	Total Cost (\$)
Certified Applicator (Table 1)	1,600	\$54,048
State (Table 2)	308	\$13,773.84
Registrant (Table 3)	45	\$2,439.75
Bottom Line Respondent Total	1,953	\$70,261.59
Agency Total	130	\$8,624.20

**6(e) Reasons for Change in Burden**

The total annual respondent burden hours have increased from the previous ICR by 200 hours, from 1,753 to 1,953, based on increase in expected numbers of certified applicators (from 35 certified applicators in 2003 to 40 in the current ICR). This change is an adjustment.

**6(f) Burden Statement**

The annual respondent burden for the 1080 livestock collar program is estimated to average 40 hours per certified applicator response, 77 hours per State agency response, and 9 hours per registrant participating in the program. According to the Paperwork Reduction Act, "burden" means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. For this

collection, it is the time reading the regulations, planning the necessary data collection activities, conducting tests, analyzing data, generating reports and completing other required paperwork, and storing, filing, and maintaining the data. The agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control number for this information collection appears at the beginning and the end of this document.

Submit your comments, referencing Docket ID No. EPA-HQ-OPP-2006-0631 to (1) EPA online using [www.regulations.gov](http://www.regulations.gov) (our preferred method), or by mail to: Public Information and Records Integrity Branch (PIRIB), Mail Code: 7502P, Office of Pesticide Programs (OPP), Environmental Protection Agency, 1200 Pennsylvania Ave., NW, Washington, DC 20460, and (2) OMB by mail to: Office of Information and Regulatory Affairs, Office of Management and Budget (OMB), Attention: Desk Officer for EPA, 725 17th Street, NW, Washington, DC 20503.

Use EPA's electronic docket and comment system at [www.regulations.gov](http://www.regulations.gov), to submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the docket that are available electronically. Once in the system, select "docket search," then key in the docket ID number identified above. Please note that EPA's policy is that public comments, whether submitted electronically or in paper, will be made available for public viewing at [www.regulations.gov](http://www.regulations.gov) as EPA receives them and without change, unless the comment contains copyrighted material, CBI, or other information whose public disclosure is restricted by statute. For further information about the electronic docket, go to [www.regulations.gov](http://www.regulations.gov).



## **Attachments to the Supporting Statement**

All of the attachments listed below can be found in the docket for this ICR (unless otherwise noted); accessible electronically through [www.Regulations.gov](http://www.Regulations.gov) . On the main page, select **Advanced Search** from the menu bar at the top and select **Docket Search**. Enter the Docket ID Number, EPA-HQ-OPP-2006-0631 in the **Docket ID** field. Click on the **Submit button**. From the results page, you will be able to link to the docket view or directly open select documents found in the docket.

**Attachment A:**        **Methodology for Estimating OPP ICR Wage Rates for Industry, State and EPA Labor Costs;** Memo From Richard Keigwin, Director Biological and Economic Analysis Division, to Bill Diamond, Arnold Layne, Lois Rossi and Elizabeth Leovey July 25, 2006. Available in the docket for this information collection activity.

**Attachment B:**        **First Federal Register Notice -71 FR 62434 -** Agency Information Collection Activities; Proposed Collection; Comment Request; Recordkeeping Requirements for Certified Applicators Using 1080 Collars for Livestock Protection; EPA ICR No. 1249.08, OMB Control No. 2070-0074 (published October 25, 2006). Available in the docket for this information collection activity.

**Attachment C:**        **Public Comment** from Wyoming Department of Agriculture. Available in the docket for this information collection activity.

**Attachment D:**        **Consultation Process: List of Standard Questions**

**Attachment E:**        **Record of Consultations** and other Communications