

**Supporting Statement for a Request for OMB Review under
The Paperwork Reduction Act**

1 IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

**Safer Detergent Stewardship Initiative (SDSI) Program
EPA ICR No.: 2261.01 OMB Control No.: 2070-TBD**

1(b) Short Characterization

This new information collection request (ICR) addresses the submission of applications to EPA for recognition under the Safer Detergent Stewardship Initiative (SDSI) Program. EPA announced the program as part of a Federal Register notice (71 FR 9337; February 23, 2006) that announced the availability of the Final Aquatic Life Ambient Water Quality Criteria for Nonylphenol. Nonylphenol ethoxylates (NPEs) and their breakdown products, such as nonylphenol, are toxic to aquatic life. SDSI will complement EPA's Aquatic Life Criteria by encouraging the manufacture and use of safer surfactants, thus reducing the amount of nonylphenol ethoxylate surfactants and nonylphenol in streams and other water bodies. The Design for the Environment (DfE) program has identified safer alternatives to NPE surfactants through its partnership work with industry and environmental advocates; many are comparable in cost and are readily available.

Under SDSI, EPA will recognize environmental leaders who voluntarily commit to the use of safer surfactants. Safer surfactants are surfactants that break down quickly to non-polluting compounds. Surfactants are used in a wide variety of applications and products. Examples include detergents, cleaners, airplane deicers, and fire-fighting foams. SDSI is designed to encourage a shift to safer surfactants by companies unaware of the benefits of such a change. SDSI would also attract companies that see value in the public recognition of corporate product stewardship that SDSI will provide.

There are two categories for recognition under SDSI: Champion and Partner. Champion is the highest level of recognition offered under SDSI. At this level, the participant is invited to an awards ceremony, is listed on the EPA SDSI Web site as a Champion, and may use a special logo in their literature to help explain their participation in the program. The Partner category provides recognition of significant accomplishment towards the use of safer surfactants. Partners will be listed on the EPA SDSI Web site and may be granted recognition as a Champion in the future, if appropriate.

EPA may also ask respondents with Champion status to make information available to EPA for review to verify that Champion status respondents have not taken action that would disqualify them from continued recognition and use of EPA's SDSI logo in product literature. For example, in confirming continued eligibility for a formulating company, EPA would look to review information such as production-related records (which are already required by EPA) to

ensure that the company used only safer surfactants (i.e., surfactants that break down quickly to non-polluting compounds) in its products.

Candidates should post a statement on their Web site describing the actions that qualify them for recognition under SDSI. Candidates should also complete an application that describes the actions taken to qualify for recognition and have it signed by a company authority (e.g., Chief Executive Officer, or vice president with responsibility for product formulation).

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

Authority for SDSI derives from Section 6604 of the Pollution Prevention Act (PPA) (42 U.S.C. 13103; see Attachment A). Section 6604(b)(5) of the PPA directs EPA to facilitate the adoption of source-reduction techniques by businesses. Also, Section 6604(b)(13) directs EPA to establish an annual awards program to recognize a company or companies that operate outstanding or innovative source reduction programs. EPA developed SDSI in recognition of these directives and through consultation with a broad range of stakeholders.

SDSI's information collection activities will assist the Agency in meeting the goals of the PPA by providing resources and recognition for businesses committed to promoting and using safer surfactants. In turn, SDSI will help businesses meet their corporate sustainability goals by providing the means to, and an objective measure of, environmental stewardship. Investment analysts and advisers seek these types of measures in evaluating a corporation's sustainability profile and investment worthiness.¹ SDSI is also needed to promote greater use of safer surfactants by companies unaware of the benefits of such a change. EPA has carefully tailored its request for information, and especially the SDSI Application Form (EPA Form 6300-2), to ensure that it only asks for information essential to verifying an applicants' eligibility for award or recognition.

2(b) Practical Utility/Users of the Data

The information collected by the SDSI Program is not designed or intended to support regulatory decision-making by EPA. EPA uses the information collected in the SDSI Application Form to: (1) identify the candidate's commitment to promoting and using safer surfactants; (2) verify the candidate's involvement in promoting and using safer surfactants; and (3) determine the candidate's eligibility for award or recognition under SDSI.

In addition, EPA and stakeholders will be able to track the progress of the program, both on the level of participation and expected environmental benefits. As part of their application for recognition as a Champion under the program, the ISSA¹ plans to collect information from their

¹ "Green to Gold: How Smart Companies Use Environmental Strategy to Innovate, Create Value, and Build Competitive Advantage;" Daniel Esty and Andrew Winston; Yale University Press, New Haven, CT; 2006

¹ ISSA is a leading international trade association for the cleaning industry. It has more than 4800 members, including approximately 300 cleaning product manufacturers.

SDSI-participating members. ISSA will track and report annually to EPA the number of its members participating, and the percentage of the industry that they represent. ISSA is uniquely positioned to use their in-depth information on each member company and industry trends to authoritatively report this type of information and contribute to program measures. As a result, EPA and the public will better understand the success of program. For environmental benefits, EPA will use its own Inventory Update Rule² to establish a baseline and track changes in the levels of nonylphenol ethoxylate manufactured, imported and used in the U.S. EPA may also make use of ongoing studies that monitor the level of contaminants, like nonylphenol, in various water bodies and sediment. EPA will review information sources for endpoints such as level of program participation, trends in surfactant use, and levels of toxic surfactant degradates in waters and sediment. EPA will evaluate whether there is a correlation between SDSI participation and environmental outcomes.

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-Duplication

Respondents will not be asked to provide information that has been or is currently being collected by EPA, other federal or state agencies or proprietary sources. The information collected by the SDSI Program is unique and is not duplicative of previous information collection requests. As due diligence, EPA also checked with trade associations and potential partners to confirm that the information being collected by the SDSI Program does not exist elsewhere.

3(b) Public Notice Required Prior to ICR Submission to OMB

In proposing this new ICR, EPA provided a 60-day public notice and comment period that ended on July 9, 2007 (72 FR 26357, May 9, 2007). In total, 13 comments were submitted to the docket during the 60-day public notice and comment period. See Attachment C to this supporting statement for EPA's response to the comments. The comments are summarized as follows.

Necessity of the proposed ICR

Nine commenters expressed support of SDSI and the proposed ICR, citing that SDSI is a critical program in moving industry toward environmentally preferable detergents and that the ICR is an essential component of the program. These comments are consistent with EPA's consultations with a number of potential respondents, as referenced in Section 3(c).

Two commenters questioned the need for SDSI, stating that (1) SDSI is redundant of private recognition programs and current preferential purchasing incentives and that (2) EPA has

² The Inventory Update Rule (IUR) requires companies that manufacture, import or use certain chemicals listed on the TSCA inventory to report to EPA information about these chemicals (e.g., production/use volume) on a periodic basis. IUR reporting occurs every five years. Companies are currently providing information for calendar year 2005.

not demonstrated that the use of detergents or surfactants poses a risk to human health or the environment. As stated in Section 3(a), the scope and reach of SDSI are distinct from those of other programs. Moreover, as explained in Section 1(b), NPEs and their breakdown products, such as nonylphenol, are toxic to aquatic life.

Accuracy of the Agency's estimates of the burden of the proposed ICR

One commenter stated that EPA has underestimated the burden/cost, both to potential participants and the Agency, but did not suggest alternative assumptions. Based on its consultations with potential respondents, its experience with similar programs, and a lack of alternative assumptions, EPA believes that the burden and cost estimates are reasonable and has not made changes to the estimates in Section 6.

Quality, utility, and clarity of the information to be collected

One commenter recommended that the scope of SDSI be modified to exclude registered pesticides, or allow an additional one-year period for pesticide products to transition to safer surfactants. As detailed in the application package, EPA is allowing formulators of pesticide products an extra year to incorporate only safer surfactants in third-party finished goods and Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)-registered products. In addition, one commenter recommended that EPA provide a better definition for the term "safer detergent" since it may be unclear what constitutes an unsafe detergent. Based on our consultations, EPA believes that the current definition is clear that NPEs are not allowed for recognition under SDSI. Also, resources, including CleanGredients, are available to aid companies as they continuously improve the ingredients in all their products. Another commenter suggested several editorial changes to the application package which EPA agreed with and incorporated.

Ways to minimize the burden on potential respondents

As stated above, several editorial changes to the application package were recommended to make it clearer and easier to submit; EPA incorporated these changes. In addition, one commenter recommended that EPA accept electronic submissions to increase efficiency and reduce paper use. In response to this comment and to minimize the paper use, EPA will accept electronic copies of the application that include a scanned signature.

3(c) Consultations

Although the recognition program covered by this ICR has not started, EPA announced its intentions to develop the SDSI Program in February 2006. Since that time, EPA has received significant feedback on the SDSI Program from stakeholders. EPA continues to work closely with stakeholders that include surfactant manufacturers, cleaning product formulators, environmentalists, water treatment facilities, and cleaning industry trade associations.

On June 12, 2006, DfE held a public meeting to take comments on SDSI. Senior managers from EPA's Office of Science and Technology (Office of Water) and Office of Pollution Prevention and Toxics provided overviews of EPA's Aquatic Life Criteria for Nonylphenol and SDSI. A clear majority of stakeholders representing a broad range of interests – surfactant manufacturers, cleaning product formulators, environmentalists, a water treatment facility, and a cleaning industry trade association – expressed strong support for SDSI. Stakeholders who spoke to express support for the program at the public meeting include:

Paul Anastas, Green Chemistry Institute
Bill Balek, ISSA
Bill Greggs, Procter & Gamble
Cory Hammock, Clean Control
Marsha Hardin, Reckitt Benckiser
Lauren Heine, GreenBlue
Ed Hopkins, Sierra Club
Jennifer Jackson, East Bay Municipal Utility District
Jack Linard, Unilever
Rich Liroff, World Wildlife Fund
David Long, SC Johnson
Roger McFadden, Coastwide Chemicals
Sam Moore, Burlington Chemical

A minority of stakeholders, representing the Alkylphenol Ethoxylate Research Council (APERC), alkylphenol ethoxylate (APE)¹ and alkylphenol (AP) manufacturers, and two laundry trade associations (large APE users), expressed concerns about SDSI. Their concerns are summarized in the June 12 public meeting notes.² EPA has taken steps to ameliorate these concerns. These include (1) clarifying that the intent of the program is to encourage the use of safer surfactants; the use of any surfactants (not solely NPE surfactants) that degrade to long-lived and more toxic degradates would disqualify an applicant from recognition; (2) requiring that a company eligible for recognition have a product stewardship strategy to ensure the use of safer surfactants; and (3) limiting the scope of the program to those products whose use routinely results in their discharge to the environment; products such as ink, paint, and oil are not included.

In addition to these stakeholder consultation and outreach efforts, under, OMB regulations require agencies to consult with potential ICR respondents and data users about specific aspects of ICRs (5 CFR 1320.8(d)(1)). In accordance with this regulation, EPA consulted with six potential respondents by telephone to get feedback on the following questions:

- Please provide your best estimate regarding how long it would take to complete the application in terms of total hours.
- We are also interested in how many personnel (i.e., clerical, technical, and managerial) it would take for applicants to review the program information, obtain approval from senior management and complete the form.

¹ NPEs are part of the APE family of chemicals.

² The meeting notes are available in the public docket ([Docket ID No. EPA-HQ-OPPT-2006-0343](#)), which can be accessed online via [Regulations.gov](#)

- In addition, please provide us with any constructive criticism / comments you might have regarding the application itself, questions posed, instructions, description of the program, etc. Please note that the SDSI program has changed somewhat. When we first discussed SDSI it was focused exclusively on NPEs. Now the program is more generally focused on encouraging companies to move towards "safer surfactants." We would greatly appreciate your comments on this change in focus also.

EPA received direct feedback from the following individuals; a few of these individuals also provided input through the public comment process.

- Bill Balek, ISSA (a trade association for the cleaning industry), 1-800-225-4772
- Cory Hammock, Clean Control, 478-922-5340
- Roger McFadden, Coastwide Laboratories, 503-218-4900
- Lauren Heine, Lauren Heine Group LLC, and Green Blue Institute, 360-738-4643
- John Bartlett, Barricade International, 800-201-3927
- Robert Israel, JohnsonDiversey, 262-631-4437

Bill Balek -- a representative from ISSA (a trade association for the cleaning industry) -- independently solicited feedback from the following members of ISSA and forwarded it to EPA.

- Candice Rushton, Betco, 419-725-3833
- Carol Chapin, Simple Green, 562-795-6000
- Barbara Whitstone, CleanPower, 414-302-3000
- John Barrett, KIMCO Corporation, 708-583-9800
- Jon Scoles, Scoles Floorshine Industries, 732-681-4545
- Linda Silverman, Maintex, 626-961-1988

See Attachment D for a summary of all the responses received through the consultations. In general, the individuals were supportive of the ICR and said the burden estimates appeared reasonable. Therefore, EPA made no changes to the burden estimates in this supporting statement.

3(d) Effects of Less Frequent Collection

The SDSI Application Form is designed to be a one-time information submission for organizations that wish to participate in the SDSI Program as either a Partner or Champion. In some instances, an organization that applies for Partner recognition may choose to re-apply at a later date for Champion recognition. Without this information, EPA will not be able to effectively determine whether companies are switching to safer surfactants nor recognize companies who successfully transition to safer surfactants.

3(e) General Guidelines

The information collection activities discussed in this ICR comply with all regulatory guidelines under 5 CFR 1320.5(d)(2).

3(f) Confidentiality

No information collected by EPA under SDSI comprises confidential business information.

3(g) Sensitive Questions

The information collection activities discussed in this document do not involve any sensitive questions.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and NAICS Codes

SDSI seeks partners from establishments engaged in the production or use of surfactants, as well as establishments involved in the purchasing, distribution or use of products containing surfactants, whose use routinely results in their discharge to the environment. Others (e.g., non-profit organizations, unions, academia) may also qualify through active encouragement of the use of safer surfactants.

Below is a list of North American Industry Classification System (NAICS) codes and associated industries that may be affected by information collection requirements covered under this ICR. This list is intended to be illustrative; entities from other industries may elect to apply for recognition through SDSI. However, EPA expects that most applications will come from the following industries:

<u>NAICS Code</u>	<u>Affected Industry</u>
3256	Soap, Cleaning Compound, and Toilet Preparation Manufacturing
424490	Other Grocery and Related Products Merchant Wholesalers
424690	Other Chemical and Allied Products Merchant Wholesalers
424990	Other Miscellaneous Nondurable Goods Merchant Wholesalers
4451	Grocery Stores
481	Air Transportation
561210	Facilities Support Services
561720	Janitorial Services
561740	Carpet and Upholstery Cleaning Services
611310	Colleges, Universities, and Professional Schools
7211	Traveler Accommodation
8123	Drycleaning and Laundry Services

4(b) Information Requested

Once a prospective organization reviews the SDSI materials and decides to apply, it should submit a SDSI Application Form (EPA Form 6300-2) (see Attachment B for complete form). All forms will be available in hard copy or electronic form. Participants can use the hard

copy forms they receive from EPA by mail or download PDF versions of the forms from the SDSI Web site. Applications will be received on an ongoing basis over the three years covered by this ICR. Only candidates for recognition at the champion level are eligible for the awards ceremony. Champion status respondents also maintain information already required by EPA, such as production-related records, that the Agency may review in order to verify that the company used only safer surfactants (i.e., surfactants that break down quickly to non-polluting compounds) in its products thereby confirming that their subsequent surfactant uses have not disqualified them from continued recognition and use of EPA's SDSI logo in product literature.

(i) Data items:

The reporting items include:

- Facility name and Web site URL;
- Name, title, address, phone number, fax number, and e-mail address of the candidate's primary contact person;
- Status (partner or champion) for which the candidate is applying;
- Type of organization (e.g. manufacturing, purchasing, retail);
- Description of facility and any relevant affiliations;
- Descriptions of actions taken to qualify for recognition;
- Relevant supporting documentation showing one or more of the following (requirements vary by organization type / recognition level): evidence of a full or intended transition to safer surfactants; a strategy to ensure that only safer surfactants are used or purchased by specified dates; a written commitment to a full transition to safer surfactants within a specific time period; activities taken to date to promote the use of safer surfactants
- Where applicable, total production or use volume of surfactants
- Signature, name, and title of senior company authority (e.g., CEO, or vice president for health and environment).

a. Respondent activities:

Candidates should post a statement on their Web site describing the actions that qualify them for recognition under SDSI. In addition, candidates conduct the following activities in order to complete and submit the SDSI Application Form (EPA Form 6300-2):

- Review the SDSI information;
- Decide whether to apply for recognition, and whether to apply for partner or champion status;
- Select a primary contact person for the program;
- Complete the SDSI Application Form, including obtaining the signature of a company authority (e.g., CEO or vice president for health and environment);
- Describe how their organization meets the evaluation criteria for the relevant recognition;
- Fax, mail, or scan and e-mail the signed completed form to EPA;
- Provide relevant documentation to EPA upon request.

5. THE INFORMATION COLLECTED – AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

Under SDSI, EPA engages in the following activities related to the SDSI Application Form:

- Distribute the SDSI Application Form to potential participants, and maintain a downloadable PDF version on the SDSI Web site;
- Answer questions posed by potential applicants regarding recognition under the Initiative;
- Receive the completed forms, review for accuracy, and place any necessary follow-up calls; and
- Approve candidates for recognition and notify both successful and unsuccessful applicants of the decisions.

EPA will also evaluate whether there is a correlation between SDSI participation and environmental outcomes by using Inventory Update Rule data to establish a baseline and track changes in the levels of nonylphenol ethoxylate manufactured, imported and used in the U.S. EPA may also make use of ongoing studies that monitor the level of contaminants, like nonylphenol, in various water bodies and sediment. EPA will review information sources for endpoints such as level of program participation, trends in surfactant use, and levels of toxic surfactant degradates in waters and sediment. EPA may also review a respondent's production-related records to verify that the company used only safer surfactants (i.e., surfactants that break down quickly to non-polluting compounds) in its products thereby confirming that their subsequent surfactant uses have not disqualified them from continued recognition and use of EPA's SDSI logo in product literature.

5(b) Collection Methodology and Management

Respondents will be able to obtain the SDSI Application Form in hard copy from EPA or by downloading it from the SDSI Web site. The signed, completed forms can be faxed, mailed, or scanned and e-mailed to EPA. In collecting and analyzing the information associated with this ICR, EPA will use a telephone system, personal computers, and applicable database software. EPA will ensure the accuracy and completeness of collected information by reserving the right to request the list of ingredients (e.g., bills of lading, invoices) or other relevant documentation at any time to confirm that candidates have achieved the criteria for recognition.

5(c) Small Entity Flexibility

EPA expects that some of the participants in the SDSI program will be small entities. EPA has designed its application form to minimize respondent burden while obtaining sufficient and accurate information. In addition, given the voluntary nature of the collection, EPA expects

that respondents will participate only if the benefits of participation outweigh the information collection burden.

5(d) Collection Schedule

Organizations may submit a one-time application for recognition as Partners or Champions at any time.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

Exhibit 6.1 presents the estimated burden hours and costs for all respondents during each of the three years covered under this ICR assuming 10 hours for all participant categories. No capital or operations and management costs are incurred by respondents under this ICR.

The data collection mechanism for SDSI is the SDSI Application Form (EPA Form 6300-2). In an effort to minimize burden and cost, the SDSI Application Form was designed to contain straightforward questions. It was also designed in a way that one application package will serve all types of participants. The expected participant categories for SDSI are as follows: chemical manufacturers, formulators, retailers / distributors, institutional purchasers, and “others” (e.g., non-profits, unions, and academia). Within these participant categories, it is expected that the chemical manufacturers, formulators, retailers / distributors, and institutional purchasers will be private sector institutions. Within the participant category “others,” about ten local governments (e.g., municipal water supply systems) are likely to participate, with the remaining participants being private sector institutions.

6(a) Estimating Respondent Burden

The average respondent burden is estimated to be 10 hours for all participant types. EPA used professional judgment to arrive at a burden estimate and then consulted representatives from the participant categories to make sure the burden estimate was reasonable (see section 3(c)). Burden hours for the SDSI application package are for reporting purposes only and include posting relevant information on the applicant website.

We expect that for a typical entity, program and application review will take about one hour (technical staff). Obtaining approval, which is likely to involve verifying assumptions with staff and ensuring support from multiple levels of management, will take about three hours (1 managerial, 1 technical, 1 clerical). Completing the application form will take about 5 hours (4 technical, 1 clerical) and posting information on company websites will take 1 hour (1 technical) given the data reporting requirements. Included in the application form estimate of 5 hours is the potential burden that would be incurred if EPA finds it necessary to verify the information in the application. For purposes of the burden estimate, EPA assumes that it will need to verify information from one organization in each participant category. This burden, when distributed among all participants, is about 32 minutes per participant ((40 hrs x 5 participants) / 375 total participants).

6(b) Estimating Respondent Costs

EPA estimates an average hourly labor rate (base hourly rate plus fringe and overhead) of \$64 for managerial staff, \$53 for technical staff, and \$26 for clerical staff. These three labor rate estimates are taken from manufacturing industry data in “[Economic Analysis of Expedited Significant New Use Rules for 66 Chemical Substances](#),” (December 2006) and are presented in Exhibit 6.2 of this supporting statement. The type of staff needed to complete the SDSI Application Form and their associated hourly labor rates were verified by contacting representatives from the participant categories.

6(c) Estimating the Respondent Universe and Total Burden and Costs Burden

EPA estimates that 375 applications will be submitted over the three-year life of the clearance. This estimate is based on the assumption that about 300 participants will apply for recognition under SDSI – 150 for Partner recognition and 150 for Champion recognition – and that roughly half of the 150 participants who apply for Partner recognition (or 75) will apply at a later time for Champion recognition. The estimate of 300 participants assumes that twice the number of organizations that have expressed interest in SDSI will ultimately participate (to date, 140⁷ different organizations have expressed interest). Furthermore, due to the nature of SDSI and the demographic of interested parties, EPA estimates that about 55% of participating companies⁸ will be formulators, 10% chemical manufacturers, 6% retailers / distributors, 6% institutional purchasers, and 23% others. The total burden hours and cost associated with this information collection are 3,750 hours and \$182,625, respectively.

6(d) Estimating Agency Burden and Costs

Exhibit 6.3 presents the estimated Agency burden hours and costs associated with the information collection activities under this ICR. Other direct costs (copying, printing, telephone, and mailing expenses) are also included. EPA based its burden estimates on its experience managing other voluntary programs.

Based on the general schedule (GS) pay schedule, EPA estimates an average hourly labor rate (hourly rate plus the standard government overhead factor of 1.6) of \$58⁹ for managerial staff, \$43 for technical staff, and \$20 for clerical staff. The Agency expects most activities to be performed by managerial staff (25 percent) and technical staff (75 percent).

⁷ This includes all companies in the interest list as of December 2006, excluding EPA and EPA contractors, and counting similar entities such as “The Dow Chemical Company” and “The Dow Chemical Company, Larkin Labs” as one company.

⁸ Based on the list of interested parties as of December 2006.

⁹ These three labor rates were estimated using the following GS-levels: GS-13 Step-5 for managerial staff, GS-10 Step-10 for technical staff, and GS-5 Step-1 for clerical staff.

Exhibit 6.1. Estimated Burden and Costs to Respondents

Type of Affected Public	Collection activity		Estimated response time (hours)			Total burden (hours)				Hourly labor cost			Total cost
			M	T	C	M	T	C	Total	M	T	C	
Private Sector	Chemical Manufacturers	37											
	▪ Review application and program information		0	1	0	0	37	0	37	\$64	\$53	\$26	\$1,961
	▪ Obtain senior approval		1	1	1	37	37	37	111	\$64	\$53	\$26	\$5,291
	▪ Complete and submit package ¹		0	4	1	0	148	37	185	\$64	\$53	\$26	\$8,806
	▪ Post information on website		0	1	0	0	37	0	37	\$64	\$53	\$26	\$1,961
	<i>Subtotal</i>	37	1	7	2	37	259	74	370	--	--	--	\$18,019
	Formulators	206											
	▪ Review application and program information		0	1	0	0	206	0	206	\$64	\$53	\$26	\$10,918
	▪ Obtain senior approval		1	1	1	206	206	206	618	\$64	\$53	\$26	\$29,458
	▪ Complete and submit package ⁶		0	4	1	0	824	206	1030	\$64	\$53	\$26	\$49,028
Private Sector and Local Government	▪ Post information on website		0	1	0	0	206	0	206	\$64	\$53	\$26	\$10,918
	<i>Subtotal</i>	206	1	7	2	206	1442	412	2060	--	--	--	\$100,322
	Retailers / Distributors	23											
	▪ Review application and program information		0	1	0	0	23	0	23	\$64	\$53	\$26	\$1,219
	▪ Obtain senior approval		1	1	1	23	23	23	69	\$64	\$53	\$26	\$3,289
	▪ Complete and submit package ⁶		0	4	1	0	92	23	115	\$64	\$53	\$26	\$5,474
	▪ Post information on website		0	1	0	0	23	0	23	\$64	\$53	\$26	\$1,219
	<i>Subtotal</i>	23	1	7	2	23	161	46	230	--	--	--	\$11,201
	Institutional Purchasers	23											
	▪ Review application and program information		0	1	0	0	23	0	23	\$64	\$53	\$26	\$1,219
	▪ Obtain senior approval		1	1	1	23	23	23	69	\$64	\$53	\$26	\$3,289
	▪ Complete and submit package ⁶		0	4	1	0	92	23	115	\$64	\$53	\$26	\$5,474
	▪ Post information on website		0	1	0	0	23	0	23	\$64	\$53	\$26	\$1,219
	<i>Subtotal</i>	23	1	7	2	23	161	46	230	--	--	--	\$11,201
Others (e.g. non-profits, unions, academia)	Others (e.g. non-profits, unions, academia)	86											
	▪ Review application and program information		0	1	0	0	86	0	86	\$64	\$53	\$26	\$4,558
	▪ Obtain senior approval		1	1	1	86	86	86	258	\$64	\$53	\$26	\$12,298
	▪ Complete and submit package ⁶		0	4	1	0	344	86	430	\$64	\$53	\$26	\$20,468
	▪ Post information on website		0	1	0	0	86	0	86	\$64	\$53	\$26	\$4,558
	<i>Subtotal</i>	86	1	7	2	86	602	172	860	--	--	--	\$41,882
	Total	375								3750			\$182,625

¹ Includes burden of verifying data (about 40 hours), which EPA estimates will only need to be done for 1 organization in each participant category. This burden, when distributed among all participants, is about 32 minutes per participant ((40 hrs x 5 participants) / 375 total participants).

Exhibit 6.2. Derivation of Respondent Loaded Labor Rates

Labor Category	Data Sources ^a	Date	Wage	Fringe Benefit	Fringes as % wage	Overhead % wage ^b	Fringe + overhead factor	Loaded Wages
			(a)	(b)	(c)=(b)/(a)	(d)	(e)=(c)+(d)+1	(f)=(a) × (e)
Managerial	BLS ECEC, Private Manufacturing industries, "Mgt, Business, and Financial"	Dec. 2005	\$38.22	\$18.89	49.42%	17%	1.66	\$63.61
Professional/Technical	BLS ECEC, Private Manufacturing industries, "Professional and related"	Dec. 2005	\$31.02	\$16.73	53.93%	17%	1.71	\$53.02
Clerical	BLS ECEC, Private Manufacturing industries, "Office and Administrative Support"	Dec. 2005	\$15.73	\$7.97	50.67%	17%	1.68	\$26.37

Notes:

^a Unpublished *Employer Costs for Employee Compensation: Private Manufacturing Industry by Occupation, December 2005*. Data received by Carol Rawie, US EPA, from Raphael Branch, US Bureau of Labor Statistics, May 10, 2006 (BLS, 2006c). The data is not seasonally adjusted (email from Raphael Branch to Carol Rawie, November 17, 2005).

^b An overhead rate of 17% was used based on assumptions in *Wage Rates for Economic Analyses of the Toxics Release Inventory Program* (Rice, 2002), and the *Revised Economic Analysis for the Amended Inventory Update Rule: Final Report* (EPAB, 2002).

Exhibit 6.3. Agency Burden/Cost

Activities	Hours per Labor Category		Labor Cost per Hour		Total Cost per Activity		Total Hours and Cost	
	Mgmt	Tech.	Mgmt	Tech.	Mgmt	Tech.	Hours per Activity	Cost per Activity
SDSI application form								
Distribute forms	7	23	\$58	\$43	\$406	\$989	30	\$1,395
Answer questions	7	23	\$58	\$43	\$406	\$989	30	\$1,395
Record / enter forms	10	30	\$58	\$43	\$580	\$1,290	40	\$1,870
Verify information; Make awards selection	12	38	\$58	\$43	\$696	\$1,634	50	\$2,330
Notify applicants of decision	3	9	\$58	\$43	\$174	\$387	12	\$561
Total	39	123	--	--	\$2,262	\$5,289	162	\$7,551

6(e) Bottom Line Burden Hours and Cost Tables

a. Respondent Tally

Exhibit 6.4. Average Estimated Respondent Burden and Cost Summary

Average # of Respondents	Average Burden Hours	Average Cost
375	3,750	\$182,625

b. Agency Tally

Exhibit 6.5. Average Estimated Agency Burden and Cost Summary

Burden Hours	Annual Cost
162	\$7,551

6(f) Reasons for Change in Burden

Since this is a new ICR, change in respondent burden is not applicable.

6(g) Burden Statement

The annual public burden for this collection of information is estimated at 10 hours per response, including time for reviewing instructions, gathering information, and completing and reviewing the application. 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 includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An 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 above. The OMB control numbers for EPA's regulations in title 40 of the CFR, after appearing in the Federal Register, are listed in 40 CFR part 9 and included on the related collection instrument or form, if applicable.

The Agency has established a public docket for this ICR under Docket ID No. EPA-HQ-OPPT-2007-0274, which is available for online viewing at www.regulations.gov, or in person viewing at the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Pollution Prevention and Toxics Docket is (202) 566-0280. You may submit comments regarding the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden, including the use of automated collection techniques.

Submit your comments, referencing Docket ID No. EPA-HQ-OPPT-2007-0274 and OMB Control No. 2070-NEW, to (1) EPA online using www.regulations.gov (our preferred method), or by mail to: Document Control Office (DCO), Office of Pollution Prevention and Toxics (OPPT), Environmental Protection Agency, Mail Code: 7407T, 1200 Pennsylvania Ave., NW, Washington, D.C. 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.

ATTACHMENTS TO THE SUPPORTING STATEMENT

Attachments to the supporting statement are available in the public docket established for this ICR under docket identification number EPA-HQ-OPPT-2007-0274. These attachments are available for online viewing at www.regulations.gov or otherwise accessed as described in section 6(f) of the supporting statement.

Attachment A: **42 USC 13103 - Pollution Prevention Act Section 6604.** Also available at online at the US House of Representatives' Office of the Law Revision Counsel's [US Code website](http://uscode.house.gov)

Attachment B: **EPA Form 6300-2 - SDSI Application Form**

Attachment C: **Response to Public Comments**

Attachment D: **Summary of Consultations with Potential Respondents**