

OMB Control Number 2070-0029; EPA ICR Number 0155.09

ICR ATTACHMENT E

**Record of Consultations Between the U.S. Environmental Protection Agency and
Respondents to the Information Collection Request:
“Certification of Pesticide Applicators”**

1. Dale W. Dubberly; Florida Department of Agriculture and Consumer Services
2. Larry G. Olsen; U.S. Department of Agriculture, Cooperative Extension Service;
Michigan State University
3. Jack Peterson; Arizona Department of Agriculture

Consultation Questions
OPP ICR - Certification of Pesticide Applicators

OMB No: 2070-0029; EPA No: 0155.09

Contact information

Please fill in your name, title and contact information (at least e-mail or phone number) where you prefer to be contacted. We are required to include your name and contact information in the next Federal Register notice on this information collection request (ICR).

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Questions regarding the ICR document

(1) Publicly Available Data

Is the information that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency? **No.**

If yes, where can one find the data?

(2) Frequency of collection

Can the Agency collect the information less frequently and still produce the same outcome? **No.**

(3) Clarity of Instructions

Based on the regulations and Agency guidance, is it clear what you are required to do and how to submit data? **Yes.** If not, what suggestions do you have to clarify instructions?

Do you understand what records need to be kept? **Yes.**

Are submission formats clear and logical? **Yes.**

(4) Electronic Reporting and Record keeping

Are the Agency web-based reporting tools working well? **Yes.** What improvements would you suggest for the reporting templates?

What benefits have electronic reporting brought you in terms of burden reduction or greater efficiency in reporting? **The primary benefit is the amount of time preparing written reports vs. entering the data on-line. A savings of staff and clerical time assembling the data.**

(5) Burden and Costs

Are the labor rates and burden hour estimates in the ICR supporting statement accurate? **Yes.** Bear in mind that the estimates include only burden hours and costs associated with the paperwork involved with this ICR.

If you provide burden and cost estimates that are substantially different from EPA's, please provide an explanation of how you arrived at your estimates.

The Agency has assumed there is no capital cost associated with this activity. Is that correct? **I would suggest that IT be included as a capital cost.**

Are there other costs that should be accounted for that may have been omitted? **No.**

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Questions regarding the ICR document

(1) Publicly Available Data

Is the information that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency?

I am not aware of any other source of the certification information requested by this notice. Restricted pesticide use records are required to be generated by rule for the USDA Agricultural Marketing Service - Recordkeeping Branch. However, these data are not required to be submitted and therefore are not summarized nor publicly available.

If yes, where can one find the data?

The USDA National Agriculture Statistic Service conducts surveys of chemical use including both restricted and general use pesticides and makes them available in both printed and electronic formats.

Both sources of pesticide use information are more detailed than required by EPA, so no additional burden is required by applicators as proposed in this rule.

There are also reports of pesticide use records available from private sources at a cost.

(2) Frequency of collection

Can the Agency collect the information less frequently and still produce the same outcome?
This data needs to be collected at least annually as proposed in this ICR. The data reports are necessary to justify the grant allocations through the Cooperative Agreements.

(3) Clarity of Instructions

Based on the regulations and Agency guidance, is it clear what you are required to do and how to submit data? If not, what suggestions do you have to clarify instructions?

The table on page 7 is not clear when it refers to "Respondent Activities". The respondents participating in the data collection activity listed on page 5 in the NAICS codes are numerous, and most of them do not need to report on all the individual items listed in the table. Another column listing who has to report which item would be helpful and clarify the intent of the ICR.

Section 5 "Information Collected....." Agency Activities is misleading. Does this refer to EPA or the State Lead Agencies for pesticide regulation?

The remainder of the ICR appears to be very clear in it's directions.

Do you understand what records need to be kept?

Once the clarification is made relative to who needs to report what, the ICR is clear on what data needs to be generated and reported.

Are submission formats clear and logical?

Not having to report any of this information, I am not sure how practical, clear and user friendly the submission formats are.

(4) Electronic Reporting and Record keeping

Are the Agency web-based reporting tools working well? What improvements would you suggest for the reporting templates?

Not having to report any of this information, I am not sure how practical, clear and user friendly the reporting system is. However, according to our State Lead Agency Pesticide Section manager, the electronic reporting system works great and gets easier each year as only updates are needed from previous year reports.

What benefits have electronic reporting brought you in terms of burden reduction or greater efficiency in reporting?

Not having to report any of this information, the electronic reporting has no bearing on the USDA Cooperative Extension Service where I work.

(5) Burden and Costs

Are the labor rates and burden hour estimates in the ICR supporting statement accurate?

Bear in mind that the estimates include only burden hours and costs associated with the paperwork involved with this ICR.

The numbers presented look to be reasonable.

If you provide burden and cost estimates that are substantially different from EPA's, please provide an explanation of how you arrived at your estimates.

Not needed.

The Agency has assumed there is no capital cost associated with this activity. Is that correct?

Yes.

Are there other costs that should be accounted for that may have been omitted?

No.

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Questions regarding the ICR document

(1) Publicly Available Data

Is the information that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency?

I am uncertain I understand this question. State's do record checks on both commercial and private applicators. USDA pays some states to do this. States or the EPA in Navajo country are the only ones who track certified applicators renewals or initial.

If yes, where can one find the data?

(2) Frequency of collection

Can the Agency collect the information less frequently and still produce the same outcome? I believe once a year reporting would suffice if it were timed with when the various information is used by the EPA. It currently is reported twice per year.

(3) Clarity of Instructions

Based on the regulations and Agency guidance, is it clear what you are required to do and how to submit data? If not, what suggestions do you have to clarify instructions? For tracking certified applicators – yes.

Do you understand what records need to be kept?

Yes

Are submission formats clear and logical?

Yes for us using the CPARD system it is.

(4) Electronic Reporting and Record keeping

Are the Agency web-based reporting tools working well? What improvements would you suggest for the reporting templates?

At this point nothing, however, should an issue arrive I would hope that changes could be made without some sort of immense movement of the earth.

We use the CPARD database and it is easy to use and I find it very useful in looking into other state's programs. This is a help in dealing with reciprocal certifications.

What benefits have electronic reporting brought you in terms of burden reduction or greater efficiency in reporting? See above. This has made reporting very easy.

(5) Burden and Costs

Are the labor rates and burden hour estimates in the ICR supporting statement accurate? Bear in mind that the estimates include only burden hours and costs associated with the paperwork involved with this ICR.

Yes, the entire discussion seemed on the mark.

If you provide burden and cost estimates that are substantially different from EPA's, please provide an explanation of how you arrived at your estimates.

The Agency has assumed there is no capital cost associated with this activity. Is that correct?

Yes – a person may choose to purchase computer software to make these records

Are there other costs that should be accounted for that may have been omitted?

No, I thought the cost review was very adequate