

**SUPPORTING STATEMENT FOR AN
INFORMATION COLLECTION REQUEST (ICR)**

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Numbers of the Information Collection

Title: Pesticide Registration Fees Program

OMB No.: 2070-new

EPA No.: 2330.01

1(b) Short Characterization/Abstract

This Information Collection Requests (ICR) covers the paperwork burden hours and costs associated with the information collection activities under the pesticide registration fee programs. Pesticide registrants are required by statute to pay an annual registration maintenance fee for all products registered under Section 3 and Section 24(c) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). In addition, the Pesticide Registration Improvement Act (PRIA) amended FIFRA in 2004 to create a registration service fee system for applications for specific pesticide registration, amended registration, and associated tolerance actions (Section 33). This ICR specifically covers the activities related to both the collection of the pesticide registration fees and the submission and processing requests for the fees to be waived.

These activities are ongoing and this ICR will combine the following currently approved ICRs: "Pesticide Registration Maintenance Fees" (EPA No. 1214.07, OMB No. 2070-0100), and "Pesticide Registration Fee Waivers (PRIA)" (EPA No. 2147.03, OMB No. 2070-0167). These two information collections are being combined into one ICR because the programs they represent share similar respondent populations and activities. The Agency believes that combining these information collections into one ICR will increase the efficiency and simplify the review of the paperwork activities and related burden estimates of these programs for both the public and EPA. Since this is the first ICR in which these activities are being combined, to simplify comparisons to the existing ICRs the Agency is presenting the activities separately.

Pesticide Product Registration Maintenance Fees

Respondents complete and submit EPA Form 8570-30 (Attachment A) indicating the respondent's liability for the registration maintenance fee. The first Registration Maintenance Fee filing form was sent to approximately 5,000 pesticide registrant firms in 1989. Since then, the number of respondents has slowly declined from approximately 2800 firms in 1990 to 2500 in 1991, 2350 in 1992, 2250 in 1993, and 2200 in 1994. Since 1994, the number of registrants to which these forms are sent has declined steadily to a total of 1,720 in January, 2009. Each affected firm is required to complete the filing form and submit their fee payment by January 15 of each year.

Annually, the Agency provides registrants with a list of their products currently

registered with the Agency. Registrants are provided the opportunity to review the list, determine its accuracy, and remit payment of the maintenance fee. The list of products has space identified for marking those products to be supported and those products that are to be canceled. The registrants are also instructed to identify any products on the list which they believe are transferred to another company, and to add to the list any products which the company believes are registered that are not on the Agency-provided list. The failure to pay the required fee for a product will result in cancellation of that product's registration.

Pesticide Registration Fee Waivers

This Information Collection is a proposed renewal of an existing ICR that is currently approved by OMB and is due to expire October 31, 2010. This information collection allows the EPA to process requests for waivers and exemptions of fees under Section 33 of FIFRA. The ICR covers the collection activities associated with requesting a fee waiver or exemption and involves requesters submitting a waiver or exemption request, information to demonstrate eligibility for the waiver or exemption, and certification of eligibility. Waivers are available for small businesses and minor uses and exemptions are available for minor uses and actions solely associated with the Inter-Regional Research Project Number 4 (IR-4). State and federal agencies are exempt from the payment of fees. This ICR provides burden hour and labor cost estimates for both applicants for fee waivers and EPA employees who process and approve or deny waiver requests.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

Under FIFRA, EPA must evaluate pesticides thoroughly, before they can be marketed and used in the United States, to ensure that they will not pose unreasonable adverse effects to human health and the environment. Pesticides that meet this test are granted a license or "registration" which permits their distribution, sale and use according to requirements set by EPA to protect human health and the environment.

Pesticide Product Registration Maintenance Fees

Section 4(i)(5) of FIFRA (Attachment B) requires registration maintenance fees to be applied to all products registered under Section 3 and Section 24(c) of FIFRA. The fees are to be paid annually for each product registered and payable on January 15 of each year. The authority to collect fees under the 1988 amendments would have terminated on September 30, 1997. However, the Food Quality Protection Act (FQPA) amended FIFRA and extended the authority to collect these fees until September 30, 2001. The EPA Appropriation Bills of FY 2002 and FY 2003 also extended the authority to collect maintenance fees. PRIA, which became effective on March 23, 2004, further extended the authority to collect maintenance fees through fiscal year 2012.

Pesticide Registration Fee Waivers

Section 33 of FIFRA requires the collection of fees in order to enhance the review of

covered pesticide products (see Attachment E and Attachment J for information on the current fee schedule). Fees collected under this program will help to reduce time frames for registration decisions; provide greater predictability and more accountability for those decisions; ensure that FQPA deadlines are met; and result in more predictable and augmented funding for the pesticide program. Section 33 also established provisions that allow these fees to be exempted entirely. The registration service fee system was reauthorized by the [Pesticide Registration Improvement Renewal Act \(PRIA 2\)](#) until September 30, 2014, although the decision times or the timeframe or amount of time that the Agency has to make a decision under the system do not apply to applications received after September 30, 2012.

A registration applicant may seek a waiver as a small business, defined by the PRIA as a business with fewer than 500 employees and on average, annual global gross revenue from pesticides of no more than \$60 million over the most recent three-year maintenance fee billing cycle. For a business entity with one or more affiliates, the gross revenue limit includes total global revenues from pesticides for the entity and all of its affiliates, including parent and subsidiary entities.

A registration applicant qualifying as a small business under the PRIA will be entitled to a waiver of fifty percent (50%) of its fees. In addition, 75% of a fee will be waived for small businesses with, on average, annual gross global revenues from pesticides over the most recent three-year maintenance fee billing cycle, including affiliates, of no more than \$10 million. Small business applicants requesting waivers must provide EPA with appropriate documentation demonstrating that they meet these criteria.

A registration applicant may also request a minor use waiver or fee reduction if the applicant can demonstrate that anticipated revenues from the uses described in the registration application would be insufficient to justify the imposition of the full application fee. The Agency may grant a full exemption or a partial reduction in the fee based upon its consideration of the supporting documentation provided.

In addition, the statute states that the Agency shall exemption the registration service fee for an application if the Administrator determines that two criteria are met: that the application is solely associated with IR-4 tolerance petition and that the exemption is in the public interest. The Agency anticipates that most applications submitted by the IR-4 program would qualify for the exemption. Finally, the statute exempts agencies of the Federal Government or a State from fees.

The program is expected to generate in excess of \$10 million in new registration service fees annually over five years and allows applicants for pesticide registrations submitted prior to March 23, 2004 to pay a portion of the fee voluntarily.

2(b) Practical Utility/Users of the Data

Pesticide Product Registration Maintenance Fees

In order to provide an efficient system to bill, collect, and account for registration maintenance fees, the Agency has used a filing form which is sent to all registrants of currently

active products. The information is used by the Agency to ensure that the fees prescribed by FIFRA have been paid by each registrant. The information is also used to adjust OPP's computer files to reflect changes in the status of registrations resulting from registrant responses.

Pesticide Registration Fee Waivers

EPA is the sole intended user of the information collected. This collection of information is critical for the proper performance of Agency functions because the information collected will allow EPA to properly review a request for a waiver or exemption of fees under the PRIA without delay. The actual usefulness of the information to the Agency is that the information collected will be used to determine if the applicant qualifies for a fee waiver or fee reduction or exemption. Statutorily, in instances where the applicant requests a fee waiver or fee reduction or exemption, the decision review time period does not begin until either the Agency grants the waiver or exemption or until the registrant has paid the appropriate registration service fee (or, in the case of a partial waiver or fee reduction, the balance of the appropriate registration service fee). Processing of the application, therefore, will be delayed until the Agency can render a decision on the fee waiver or fee reduction or exemption request. With the submission of this data by the registrant, the Agency will be able to meet its statutory obligation to grant or deny a waiver request within 60 days and, potentially, earlier than the maximum 60 day period.

3. NON DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non duplication

For pesticide product registration, the specific information required under this ICR (i.e., the number of registrations that a given registrant wishes to maintain and, thus, the fee amount that will be remitted to EPA) does not exist in data bases at EPA or any other agency. To determine the amount of maintenance fees accurately, the Agency and the registrant must have a joint understanding concerning the number of products currently registered. An alternative approach considered prior to seeking approval for the original maintenance fee filing form (ICR) was to simply notify registrants that fees were due for each of their products according to a fee schedule. The registrant would submit payment according to their best information concerning the number of registrations that they wanted to support. However, if a registrant submitted payment that did not correspond to the fee schedule, the Agency would be in a position of either unilaterally determining which registrations to cancel, or contacting each registrant to determine that registrant's intentions. This option was considered to be inefficient, and not in the best interest of the Agency or the registrants.

For pesticide registration fee waivers, no other federal agency or EPA program is collecting fees for the processing of applications for pesticide registration or, therefore, information for the waiver or exemption of such fees. As such, this information collection activity does not duplicate any other collection of information by the federal government.

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

Pursuant to 5 CFR 1320.8(d), EPA will publish a Federal Register (FR) Notice announcing this proposed information collection activity and provide a 60-day public comment period.

3(c) Consultations

Pesticide Product Registration Maintenance Fees

Consultation and/or dialogue between respondents and the Agency is frequent and on-going. In addition to phone conversations, e-mails, and letters, Agency personnel participate in meetings with individual registrants as well as gatherings of large groups of registrants from time to time. These communications permit an exchange of issues, problems, and solutions on many issues.

During the preparation of this ICR renewal, EPA staff contacted the following representatives of pesticide registrants by phone or e-mail and asked them for their assessment of the burden estimates for pesticide product registration in the ICR:

Kim Davis, RegWest Company, LLC 30856 Rocky Road Greeley, CO 80631 (970) 353-0611 Kim@regwest.com (Consultant representing 36 companies holding 1 to 16 registrations)	Bob Werdig, Pesticide Registration Association 715 8 th Street S.E. Washington DC 20003 (202) 546-3260 (Consultant representing 4 companies holding 1 to 4 registrations)
Donna Leventhal, Delta Analytical 7910 Woodmont Avenue Bethesda, MD 20814 (301) 652-5495 (Consultant representing 22 companies holding 1 to 16 registrations)	William Mahrlburg, Nufarm 2300 Frederick Avenue Suite 208 St. Joseph, MO 64504 (816) 676-9000 (Company holds 393 registrations)

All four of the above respondent representatives provided feedback to a questionnaire about the collection process (see Attachment D). As is the case with pesticide registrant companies, the above respondents vary widely in company size and structure. This variability among companies included in this consultation resulted in variable responses. The average time required to complete the maintenance fee filing form depends upon the number of registrations held by the registrant. Larger companies with more registered pesticide products will take longer to complete the form, on average, than companies with fewer registrations. The time required to complete the form estimated by the above respondents ranged from 10 minutes to half an hour, all less than the estimated 0.96 hours used in this ICR renewal. In general, it appears that the Agency's burden estimates used are equal to or higher than those actually incurred, and have not been revised.

The four respondent representatives were also asked their opinion of and desire for

electronic reporting. Again, responses varied but they indicated some concern over security and electronic signatures. One respondent indicated that electronic reporting would not change the burden relative to paper responses, one said it would actually increase the burden, and the other two said it could increase the burden for some and decrease it for others. Two of the respondents said that they would still need to send a check to EPA, even if the form were submitted electronically, thereby undermining the benefit of electronic reporting.

Due to these responses, and similar feedback received informally from other registrants, it is apparent that at least some may prefer electronic reporting and payment and that some burden reduction may be realized. EPA will work with the Treasury Department to implement electronic payment of maintenance fees via <http://www.pay.gov>. This capability was in place beginning with the FY08 collection cycle. Since then about 20% of maintenance fee payment have been received electronically.

Pesticide Registration Fee Waivers

Prior to passage, the PRIA had been developed over a multi-year period based upon input from the pesticide industry, industry trade associations, public interest groups, and the Agency. The legislation to reauthorize the Pesticide Registration Improvement Act (PRIA) that was introduced into Congress known as PRIA 2 was based upon the past experience in implementing PRIA and a consensus reached by stakeholders, informed by technical information provided by the Agency. These stakeholders included CropLife America, the Consumer Specialty Products Association, the Chemical Producers and Distributors Association, the American Chemistry Council, the Natural Resources Defense Council, and Consumers Union, among other parties.

Consultation and/or dialogue between respondents and the Agency on the PRIA waivers and exemptions process, content, definitions, format, and timing is frequent and ongoing. In addition to phone conversations, e-mails, and letters, Agency personnel participate in meetings with individual registrants as well as gatherings of large groups of registrants from time to time. These communications permit an exchange of issues, problems, and solutions on many issues.

On March 1, 2009, the Agency published the fifth annual report providing an update on "Implementing the Pesticide Registration Improvement Act -- Fiscal Year 2008."¹ The report discusses in detail the processes that have been streamlined and the stakeholder involvement during FY 2008, the first year of PRIA 2 (Attachment F).

During the preparation of this ICR renewal, EPA staff contacted the following representatives of pesticide registrants by phone or e-mail and asked them for their assessment of the burden estimates for pesticide registration fee waivers in the ICR:

- Liz Bauer, Walter G. Legge Company, Inc., 800-345-3443, liz@leggesystems.com
- Terry Pizzarello, Falcon Lab LLC, 917-886-4687, tjpizza@optonline.net
- Elizabeth Tannehill, Mason Chemical Company, 800-362-1855, liz@maquat.com
- Sherry Hutcheson, Phoenix Environmental Care LLC, 229-245-8856,

1 http://www.epa.gov/pesticides/fees/2008annual_report/pria_annual_report_2008.html

sherry.hutcheson@phoenixenvcare.com

- William Stoneman, W.F. Stoneman Company, LLC on behalf of Canada Inc., 608-268-7040, billstoneman@charter.net

All five of the above respondent representatives provided feedback to a questionnaire about the collection process and the burden and labor rate estimates used by EPA (see Attachments G – G.4). As is the case with pesticide registrant companies, the above respondents vary widely in company size and structure. This variability among companies included in this consultation resulted in variable responses. Four out of the five agreed with the labor rates for management with one respondent a family member of a family owned company. Four out of the five respondents reported that the fee waiver requests were prepared by management and only one responded that technical and clerical staff was involved in preparing a request. This later respondent did agree with the Agency labor rate estimates for all labor categories. Overall, it appears that the labor rate estimates used by EPA are reasonable, and these consultations did not provide sufficient basis to amend them.

With respect to respondent burden, if management developed the requests, the Agency estimate was higher than that reported. Managers reported spending an average of three hours preparing a request. Whether managers commonly prepare fee waiver requests can not be estimated from this small sample. The one company that reported having managers, technical staff and clerical staff involved in the preparation of a request reported that the burden was close to the Agency's estimate. Consequently, the Agency did not revise its estimates.

3(d) Effects of Less Frequent Collection

The payment of maintenance fees for all pesticide products is mandated in FIFRA amendments to occur annually. Thus, there can be no option other than to require a minimum submission of the filing form once a year. Less frequent information collection in this area would violate the statute.

There is no set collection schedule, per se. Rather, the registration service fee is collected each time a registrant submits a registration application. The applicant must either pay a fee or request and be granted a waiver or exemption for each registration application submitted. Therefore, the frequency of collection depends entirely on the frequency with which an applicant submits registration applications for which they are eligible for a fee waiver or exemption. EPA cannot grant a waiver or exemption when one has not been requested and documented. Therefore, less frequent collection is not an option.

3(e) General Guidelines

With respect to the PRA imposed guidelines contained in 5 CFR 1320.6, the information collection activity for pesticide product registration has the following features:

- The respondents are required to respond on an annual basis and hence the quarterly response limitation is not applicable
- The respondents are not required to keep records relating to this information collection

for a period of more than 3 years.

- This information collection activity does not utilize a statistical survey. The requirement to collect maintenance fees for all products means that all pesticide registrants submit replies.
- The respondents are given at least 30 days to respond.
- The information collection under this ICR can be held confidential under long established procedures for properly handling Confidential Business Information. Confidentiality is discussed in more detail below.
- The respondents are not required to submit more than an original and two copies of any document.
- The ICR is for processing of fees mandated by Congress. No provision in the law allows for remuneration of respondents.
- This information collection activity has used automation to the extent practicable without electronic reporting and payment. For example, the name and address of each respondent is pre-printed by computer, alleviating the registrant of the burden of writing it in. A computer generated listing of products is also provided, and the registrant must only circle an appropriate keyword (CAN, PAY) etc. Because the regulated community runs the gamut from large multinational corporations to small sole proprietor firms, some with limited technological capabilities, the Agency makes available a simple filing form and the ability to make electronic reporting and payment (see section 3(c), above).
- As discussed in Section 4(c), this form requires the minimum amount of information from all firms.
- This collection activity does not apply to grantees.

The collection activities for pesticide registration fee waivers comply with the guidelines for information collections under the PRA. There is no record keeping requirement for information submitted under this information collection.

A registration applicant eligible for a fee waiver or exemption must submit their signed request for the waiver, certification of eligibility, and required documentation demonstrating eligibility. The industry has developed a form for the small business fee waiver request. Many requesters use this form, although the Agency does not require it. Most waivers are granted based on the small business status of the applicant, and Confidential Business Information is included in their submission (e.g., gross global revenues, business structures and employment levels). Although EPA would accept waiver requests sent in Adobe PDF format on CD-ROM, the Agency's expectation based on experience is that the majority of registrants want to send their requests in writing with ink signatures. In the future, if it appears that electronic submission of waiver requests by e-mail is beneficial and feasible for respondents and EPA, we

will seek to facilitate such submissions.

3(f) Confidentiality

Product registration maintenance fee information submitted by pesticide registrants under this ICR is considered by OPP to contain no confidential business information (CBI). If, however, registrants submit data that contains CBI or relates to trade secrets or commercial or financial information, such information is protected from disclosure under section 10 of FIFRA.

The information requested to document fee waiver or exemption requests may contain CBI. However, data and/or information submitted to the Agency in conjunction with service fee waiver or exemption requests may be claimed as trade secret or commercial or financial information and will be protected from disclosure under FIFRA section 10 and the associated regulation as contained in 40 CFR Part 2, Subpart B. Information claimed as CBI is protected from public disclosure unless the Administrator determines that disclosure is in the public interest. OPP routinely handles CBI data, and personnel are familiar with security procedures in accordance with provisions of the FIFRA Confidential Business Security Manual to ensure confidentiality. If any information is submitted that applicants claim as confidential, the Agency will employ the established procedures for handling such material.

3(g) Sensitive Questions

No information of a sensitive or private nature is requested in conjunction with this collection activity. Further, this information collection activity complies with the provisions of the Privacy Act of 1974 and OMB circular A-108.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/NAICS Codes

The North American Industrial Classification System (NAICS) codes assigned to the parties responding to this information collection are as follows:

<u>NAICS Code</u>	<u>Category</u>	<u>Description</u>
32532	Pesticide and other agricultural chemical manufacturing	individuals or entities engaged in activities related to the registration of a pesticide product
32518	Other Basic Inorganic Chemical Manufacturing	manufacturers of inorganic chemicals used as inert ingredients in pesticide products
32519	Other Basic Organic Chemical Manufacturing	manufacturers of organic chemicals used as inert ingredients in pesticide products.
9641	Regulation of Agricultural	Includes government establishments

Marketing and Commodities responsible for agricultural pest and weed regulation.

4(b) Information Requested

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

Pesticide Product Registration Maintenance Fees

Data Item A -- Registrant Identification	Registrant Name and Address are pre-printed. The registrant needs to complete this section only to indicate a name and/or address change.
Data Item B -- EPA Company Numbers	If a firm has been assigned more than one company number, the firm may combine its fee payments under a single number by writing in all of the company numbers for which the firm is paying.
Data Item C -- Maintenance Fee Calculation	The respondent must fill in the number of registrations for which he is paying the fee, number of registrations which he believes to be transferred, number of registrations to be canceled, number of registrations which he believes to be in error, total fee amount due, and check number.
Data Item D -- Authorized Company Representative or Agent	The respondent must print the name and title of the company representative or agent. The respondent must sign and date the form, and provide the telephone number of the respondent.

Pesticide Registration Fee Waivers

A registration applicant who seeks a small business waiver must submit a waiver request with appropriate documentation demonstrating that he meets the criteria established in the PRIA, i.e., that he has fewer than 500 employees and has no more than \$60 million in annual global gross revenue from pesticides, averaged over the most recent three maintenance fee billing cycles, including any such revenue from affiliates. For this purpose, the applicant may be required to submit documentation regarding numbers of employees and, on behalf of itself and its affiliates, gross revenue figures, and information on revenue from pesticides over a three-year period.

A registration applicant who seeks a minor use waiver or exemption must provide supporting documentation that anticipated revenues from the uses that are the subject of the application would be insufficient to justify imposition of the full registration fee.

A registration applicant seeking an IR-4 exemption must merely request the waiver on Form 8570-1 (*Application for Pesticide Registration*, approved under OMB Control #2070-0060) and submit the application at the same time that the IR-4 tolerance petition is submitted. The Agency will, in turn, determine whether the application is solely associated with a tolerance petition submitted by IR-4 and that the waiver is in the public interest (see Attachment I).

Although there is no record keeping requirement, PRIA provides that an application shall be subject to a registration service fee if, at any time, EPA determines that (i) the documentation supporting the waiver request is not accurate or (ii) based on the documentation or any other information, the waiver or reduction should not have been granted. Therefore, it is anticipated that applicants will retain copies of their submissions as well as documents demonstrating that the applicant is eligible for the waiver or reduction.

There are currently no EPA forms associated with this information collection activity. However, an industry workgroup comprised of representatives of registrant companies and trade associations designed a form for assisting pesticide registrants when they submit small business waiver requests under PRIA. The form is available electronically through the Consumer Specialty Products Association’s web site (http://www.cspa.org/public/news/fees_document.pdf). EPA does not sponsor this form and its use is strictly voluntary. The Agency will accept information that is submitted via the industry form as well as any other format that meets the requirements of the statute.

4(b)(ii) Respondent Activities

Pesticide Product Registration Maintenance Fees

Activities in which a registrant must engage in order to comply with this collection include the following:

Read instructions	Read accompanying instructions to understand how to fill out form, annotate list of registrations, and calculate fee due.
Plan Activities	Plan the activities necessary to respond to the billing.
Review Information	Review the attached listing of registrations and compare to the firm's records.
Complete Paperwork	Annotate attached listing of registrations to indicate which products the respondent is paying and which products are to be canceled or transferred.
File Information	Maintain a copy of the form in company files. Although this is not required, the Agency assumes that most companies will retain this information as a common business practice.

The existing paper version form is printed on 3 part NCR paper. The respondent sends one copy along with payment to the Headquarters Accounting Operations Branch Lock Box in St. Louis and the second copy together with the annotated list of products to OPP via a designated Washington D.C. area mail box. The third copy is retained by the respondent for his own records. Information contained on the forms returned to OPP is used to check and ensure that the proper amount of fees have been submitted by each registrant. In the past there has been a need for follow-up with some registrants when the information provided indicates that there has been a misunderstanding of the requirements. For the most part these have been handled by telephone. There is also a toll free information line available which registrants may use to ask questions and resolve problems regarding their maintenance fee payments. The information provided also serves as an update for pesticide product information files. Updates of the Agency’s files are an ongoing process.

Pesticide Registration Fee Waivers

Guidance on the content and submission of fee waiver requests is available on EPA’s website at <http://www.epa.gov/pesticides/fees/questions/waivers.htm> (also, see Attachment H). If a registration applicant wishes to request a fee waiver or exemption, at a minimum, it must undertake the following activities:

- Generate and submit the necessary materials to support the request.
- Indicate that a waiver or exemption is requested and that the appropriate documentation supporting the request is enclosed or has been otherwise submitted to the Agency.

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

5(a) Agency Activities

Pesticide Product Registration Maintenance Fees

The following activities are necessary to conduct the information request:

Develop Letter	Prepare a cover/transmittal letter to be included in the package.
Answer Questions	Staff a toll free information line to respond to any questions that respondents have regarding payment requirements.
Review Submissions	Review submitted forms and annotated listings for completeness.
Record Submissions	Record information provided by respondents into a tracking system. Make adjustments to Product Information Master Files as required.
Verify Payments	Cross check payment information from Financial Management Division to ensure that payment has been received.
Store Data	Image all forms, listings, and telephone conversation logs for archiving.

Pesticide Registration Fee Waivers

The Agency is expected to engage in the following activities:

- **Review and evaluate fee waiver requests.** Notify applicant of decision.
- **Verify payments.** Cross check payment information from Financial Management Division.
- **Store the data.** Image all forms, listings, telephone conversations, etc., for archiving.

5(b) Collection Methodology and Management

Pesticide Product Registration Maintenance Fees

For the past 17 years, the Agency has employed the same method of collecting maintenance fees. This method involves using OPP master files of product information to identify the firms to which the billing information is to be sent. Computer generated listings of products are mailed to each firm along with the Maintenance Fee Filing Form. The registrant is instructed to circle the word PAY, CAN, XFR, ERR, next to each Registration Number to indicate if he wants to pay for the registration, cancel the registration, indicate if he believes that the registration was transferred, or if the registration is listed in error.

The list of registrations is pre-loaded into a tracking file, and only the PAY, CAN, XFR, ERR indicator is keyed manually for each product. Company name and address information is also pre-loaded reducing the data entry burden for the maintenance fee filing forms. The total number of products for each company is calculated by computer, and totals entered from the filing form are verified by computer to ensure that all items balance. In addition, data entry for all forms is quality checked visually.

Receipt of payment is entered by the Financial Management Division into the Integrated Financial Management System (IFMS). This information is then extracted and posted to the maintenance fee tracking system to close out each record. Results are made available to OPP staff on request as soon as the information is entered into the tracking system.

Pesticide Registration Fee Waivers

Fee payments are sent to the Financial Management Division in St. Louis, MO and entered in to the Agency's Integrated Financial Management System (IFMS). Payment information is extracted from IFMS and loaded into OPP's tracking system (OPPIN). Payment is due at time of application. If additional payment is required, invoices are generated and sent both electronically and in paper. All payments and invoices are generated electronically and tracked in OPPIN. Incoming letters, fee waiver and exemption applications, mail receipts, petitions, and other types of correspondence from registrants will be retained in hard copy for a period of time and then imaged for long term electronic storage.

Procedures for evaluating fee waiver and exemption requests will not change. Information and materials submitted to justify a fee waiver are screened for completeness by the receiving division. Economic data are sent to OPP's Biological and Economic Analysis Division for analysis. The Agency will keep applicants informed of the status of the waiver application throughout the process by telephone and by mail.

5(c) Small Entity Flexibility

The Agency's filing form for the submission of maintenance fees requires the minimum amount of information that is needed to provide adequate communication between pesticide product registrants and the Agency. The needs of small businesses were of primary concern in designing the filing form. The respondents are asked to provide only readily available information. Experience indicates that there is no need for more involved reporting by large business concerns to meet Agency needs. Hence, there is no separate requirement for small businesses versus large business. Only the basic requirement to identify products that firms wish to continue to support is imposed on all registrants. In 1990 the fee structure was

changed to provide a 50% discount on the first product supported. Therefore, companies with only one registered product received the greatest benefit from the discount.

Small businesses may request a waiver of the registration service fee. A waiver applicant must demonstrate that it meets the criteria as outlined in the PRIA. The information that needs to be compiled in order to make this determination is information that companies routinely collect and maintain in the normal course of business.

5(d) Collection Schedule

The payment of maintenance fees for all pesticide products is mandated in FIFRA to occur annually. Thus, there can be no option other than to require a minimum submission of the filing form once a year. Less frequent information collection in this area would violate the statute.

The registration service fee is collected each time a registrant submits a registration application. The applicant must either pay a fee or request and be granted a waiver or exemption for each registration application submitted if the application is within the scope of one of the 140 fee categories.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

Pesticide Product Registration Maintenance Fees

Experience has shown that the average burden per respondent has remained at approximately 1 hour. The agency believes that the number of actual burden hours has remained steady due to the fact that registrants now have 20 years of experience. In 2009, 1,720 firms responded to the collection request. A summary of firms and their number of registrations is provided below.

Table 1. Number of Registrations Held by Registrants (Summary)

Number of Products	Number of Registrants	Registrants Cumulative total	Cumulative %
1 – 10	1,477	1,477	86%
11 – 20	95	1,572	91%
21 – 50	78	1,650	96%
50 - 100	32	1,682	98%
> 100	38	1,720	100%

Based on consultations with several respondents, both in the past and for this ICR renewal, we believe that the average time required to complete the maintenance fee filing form depends upon the number of registrations held by the registrant. Below is the breakdown of the burden associated with the 2009 maintenance fee filing based on registrant-supplied information.

Table 2. Respondent Burden, by Number of Registrations Held

Number of Products	Average Hours	Number of Registrants	Total Hours
1 – 10	0.75	1,477	1108
11 – 20	1.0	95	95
21 – 50	2.0	78	156
51 – 100	3.0	32	96
> 100	5.0	38	190
Totals		1,720	1,645

PAPERWORK BURDEN: 1,645 (total hours) / 1720 (number of respondents) = 0.956 hours per response (rounded to two digits).

These calculations were made using the average case scenario. The average case burden was developed from the above table.

Table 2a. Average Respondent Burden

Collection Activities	Management	Technical	Clerical	Total Hours
Read Instructions		0.25		0.25
Plan Activities	0.20			0.20
Review Information	0.20			0.20
Complete Paperwork		0.20		0.20
File Information			0.11	0.11
Total	0.40	0.45	0.11	0.96

TOTAL ANNUAL BURDEN: average hours per form (0.96) X number of respondents (1,720) = 1,645 hours.

Pesticide Registration Fee Waivers

In calculating the potential respondent burden, the Agency estimated 293 responses per year for requesting fee waivers or reductions or exemptions, based on the numbers of fee waiver or exemption applications during the maintenance fee cycle for the year of 2008.

IR-4 waiver requests are not accounted for in this burden estimation. To be eligible for the IR-4 exemption under PRIA 2, the application must be solely associated with a tolerance petition submitted by the IR-4 program and the exemption must be in the public interest. To facilitate this request, the applicant may simply include the statement "This application is being submitted with a tolerance petition submitted in connection with IR-4. I request EPA to exemption the registration service fee for this application under the IR-4 waiver provisions of FIFRA Section 33(b)(7)(E)." on Form 8570-1 (Application for Pesticide Registration). Burden hours associated with completing this form are already covered by the ICR entitled "Application for New or Amended Registration" approved under OMB Control Number 2070-0060. EPA is not requiring that registrants submit additional information. The Agency will determine whether the application is solely associated with a tolerance petition submitted by

IR-4 and whether the exemption is in the public interest.

Minor use waiver or exemption requests are not considered in estimating respondent burden because since March 23, 2004, only thirteen requests have been received out of several thousand applications.

There are three types of small business waiver applications. The first type, Type A, is a first-time applicant requesting fee waiver or reduction. The second type, Type B, is an application requesting another fee waiver or reduction within the same maintenance fee billing cycle. The third type, Type C, is from an applicant who has applied for a fee waiver in a prior maintenance fee billing cycle but not in the current cycle. EPA assumes that the respondent burden and cost for the Type B application is the lowest because Type B applicants will only need to certify that there have been no changes to the information previously submitted or, in the alternative, only provide documentation with respect to those elements that have changed. Type C applications, on the other hand, will need to submit all the documentation supporting the waiver request, providing updated financial and employee information. EPA assumes, however, that the cost and burden on most Type C applicants will be less than first time applicants because applicants will already be familiar with the waiver requirements and, in many cases, should have a portion of the supporting financial and business affiliation documentation readily available. The cost and burden on the Type A applicants will be the same as those for the first-year applicants. EPA assumes that every new applicant seeking a waiver of the registration service fee will want to familiarize him/herself with the criteria from the outset, thus this burden is considered a one-time burden that will occur the first time the applicant submits a registration application under the PRIA.

Based on the number of waiver requests EPA actually received during the first full year of PRIA 2, the maintenance billing cycle for 2008, EPA estimates that 1800 requests for registration actions will be received per year, of which 293 will request fee waivers or reductions. Of the 293 responses EPA estimates that 11% (31 out of 293) will be the first-time applicants (Type A), 59% (174 out of 293) will be the Type B applications, and 30% (88 out of 293) will be Type C applications each year. EPA estimates of respondent burden hours per response, for each of the three response types, were corroborated by representative respondents in consultations (see section 3(c) of this supporting statement) and have not been revised for this ICR renewal. The burden per response, number of responses, and total burden for each of the three response types are presented in Tables 4,5,6, and 10.

6(b) Estimating Respondent Costs

Pesticide Product Registration Maintenance Fees

As in 2006, the Agency estimates wages, benefits, and overhead for all labor categories for the pesticide industry and Agency employees using 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 C.

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 respondent costs for this renewal for managerial, technical and clerical rates are estimated at \$109.82, \$60.39, and \$35.89 per hour, respectively. These labor rates are fully loaded and include benefits and overhead costs.

The table below describes the average costs for completing one maintenance fee filing form. The average hourly burden was derived from consultation with a selected group of respondents, and is described above.

Table 3. Average Respondent Paperwork Costs

Collection Activities	Burden Hours			Total	
	Managerial \$109.82/hr.	Technical \$60.39/hr.	Clerical \$35.89/hr	Burden Hours	Cost
Read instructions		0.25		0.25	\$37.06
Plan activities	0.20			0.2	\$21.96
Review information	0.20			0.2	\$21.96
Complete Paperwork		0.20		0.2	\$12.08
File Information			0.11	0.11	\$3.95
TOTAL	0.4	0.45	0.11	0.96	\$97.02

ANNUAL PAPERWORK BURDEN: 0.96 hours X 1720 respondents = 1,651 hours.

ANNUAL PAPERWORK COSTS:

Management: 0.40 hrs. X \$109.82/hr. X 1720 respondents = \$75,556

Technical: 0.45 hrs. X \$60.39/hr. X 1720 respondents = \$46,742

Clerical: 0.11 hrs. X \$35.89/hr. X 1720 respondents = \$6,790

TOTAL = \$129,088

Pesticide Registration Fee Waivers

Consistent with recent ICR renewals, OPP is using labor cost estimates from Agency economists with respect to wages, benefits and overhead for all labor categories for affected industries, state government, and EPA employees. This approach uses a transparent and consistent methodology and current publicly-available data to provide more accurate estimates and allow easy replication of the estimates.

Methodology: The methodology uses data on each sector and labor type for an *Unloaded wage rate* (hourly wage rate), and calculates the *Loaded wage rate* (unloaded wage rate + benefits), and the *Fully loaded wage rate* (loaded wage rate + overhead). Fully loaded wage rates are used to calculate the Agency's staffing costs.

Unloaded Wage Rate: Wages are estimated for labor types (management, technical, and clerical) within applicable sectors. The Agency uses average wage data for the relevant sectors available in the National Industry-Specific Occupational Employment and Wage

Estimates from the Bureau of Labor Statistics (BLS) at http://www.bls.gov/oes/current/oes_nat.htm.

Sectors: The specific North American Industry Classification System (NAICS) code and website for each sector is included in that sector's wage rate table. Within each sector, the wage data are provided by Standard Occupational Classification (SOC). The SOC system is used by Federal statistical agencies to classify workers into occupational categories for the purpose of collecting, calculating, or disseminating data (see http://www.bls.gov/oes/current/oes_stru.htm).

Loaded Wage Rate: Unless stated otherwise, all benefits represent 43% of unloaded wage rates, based on benefits for all civilian non-farm workers, from <http://www.bls.gov/news.release/ecec.t01.htm>. However, if other sectors are listed for which 43% is not applicable; the applicable percentage will be stated.

Fully Loaded Wage Rate: We multiply the loaded wage rate by 50% (EPA guidelines 20-70%) to get overhead costs.

Attachments K – K.1 contain worksheets providing the breakout of these costs. Costs are indexed to 2008 data.

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 respondent costs for this renewal for managerial, technical and clerical rates are estimated at \$109.82, \$60.39, and \$35.89 per hour, respectively. These labor rates are fully loaded and include benefits and overhead costs.

EPA expects that applicants will incur minor expenses that are not directly related to paperwork activities, such as the costs of producing photocopies and postage costs. EPA estimates that these costs will average about \$10 per applicant and has factored these costs into the estimated total cost figures. Annual respondent burden and costs could vary with such factors as business structure of waiver applicants and types of information submitted. Therefore, the actual respondent burden and costs to a respondent could be higher or lower than the estimated respondent burden and costs reflected in tables 4,5, and 6.²

Table 4. Annual Respondent Burden and Cost Estimates (Type A)

COLLECTION ACTIVITY	Burden Hours (per year)			Total	
	Management \$109.82/hr	Technical \$60.39/hr	Clerical \$35.89/hr	Hours	Costs (\$)
Read regulation and plan activities	7	0	0	7	769
Generate materials for waiver request for submission to EPA	0	24	0	24	1,449
Store/maintain/submit and	0	0	6	6	215

² All table totals have been rounded to the nearest dollar or hour after all computations were made; in 2008 dollars.

produce information					
Totals	7	24	6	37	2,433

PAPERWORK BURDEN AND COST:

37 hours/response x 31 responses = 1,147 total hours

\$2,433/response x 31 responses = \$75,423

NON-PAPERWORK COSTS:

\$10 (postage and paper copies) x 31 responses = \$310

TOTAL ANNUAL RESPONDENT COST (TYPE A):

\$75,423 (paperwork) + \$310 (non-paperwork) = \$75,733

Table 5. Annual Respondent Burden and Cost Estimates (Type B)

COLLECTION ACTIVITY	Burden Hours (per year)			Total	
	Management \$109.82/hr	Technical \$60.39/hr	Clerical \$35.89/hr	Hours	Costs (\$)
Read regulation and plan activities	2	0	0	2	220
Generate materials for waiver request for submission to EPA	0	4	0	4	242
Store/maintain/submit and produce information	0	0	6	6	215
Totals	2	4	6	12	677

PAPERWORK BURDEN AND COST:

12 hours/response x 174 responses = 2,088 total hours

\$659/response x 174 responses = \$114,666

NON-PAPERWORK COSTS:

\$10 (postage and paper copies) x 174 responses = \$1,740

TOTAL ANNUAL RESPONDENT COST (TYPE B):

\$114,666 (paperwork) + \$1,740 (non-paperwork) = \$116,406

Table 6. Annual Respondent Burden and Cost Estimates (Type C)

COLLECTION ACTIVITY	Burden Hours (per year)			Total	
	Management \$109.82/hr	Technical \$60.39/hr	Clerical \$35.89/hr	Hours	Costs (\$)
Read regulation and plan activities	2	0	0	2	220
Generate materials for waiver request for submission to EPA	0	19	0	19	1,147
Store/maintain/submit and produce information	0	0	6	6	215
Totals	2	19	6	27	1,582

PAPERWORK BURDEN AND COST:

27 hours/response x 88 responses = 2,376 total hours
 \$1631/response x 88 responses = \$143,528

NON-PAPERWORK COSTS:

\$10 (postage and paper copies) x 88 responses = \$880

TOTAL ANNUAL RESPONDENT COST (TYPE C):

\$143,528 (paperwork) + \$880 (non-paperwork) = \$144,408

6(c) Estimating Agency Burden and Cost

Pesticide Product Registration Maintenance Fees

Agency labor rates were estimated for the relevant technical, and clerical staff using the methodology cited above. Technical and clerical rates are estimated at \$71.58 and \$41.21 per hour, respectively. The Agency expends no management hours in processing submissions. Labor rates are fully loaded and include benefits and overhead costs.

The cost to the Federal Government for this ICR is estimated to be \$82,987. This estimate has two components. The first is the annual costs of generating listings and conducting mass mailings as well as pre-loading tracking data. The Agency estimates that these activities cost \$1,518. The second component is the per submission costs totaling \$81,468, which are required on a per submission basis (see annual number of actions in Table 4).

Table 7. Agency Burden Hours per filing form and Total Cost

Collection Activities	Annual Number of Actions	Burden Hours		Total	
		Technical (\$71.58/hr)	Clerical (\$41.21/hr)	Burden Hours	Cost
Generate Listings/Mass Mailing	1	8	16	24	\$1,232.00
Pre-load Tracking Data	1	4		4	\$286.32
Receive/Review Submissions	1,720		0.2	344	\$14,176.24
Enter Data into Tracking Sys.	1,720		0.2	344	\$14,176.24
Reconcile Discrepancies	100	0.5		50	\$3,579.00
Respond to Questions	300	0.5		150	\$10,737.00
Verify Payment	1,720	0.2		344	\$24,623.52
File Documents	1,720		0.2	344	\$14,176.24
TOTAL	NA	NA	NA	1,604	\$82,986.56

Pesticide Registration Fee Waivers

The Agency's burden consists of reviewing, evaluating, and notifying applicants of the

Agency's decision to grant or deny fee waiver requests; entering data into tracking systems; verifying fee payment; and storing/maintaining this information. Table 8 estimates EPA's burden for performing these activities.³ Agency labor costs for this renewal for managerial, technical and clerical rates are estimated at \$107.56, \$71.58, and \$41.21 per hour, respectively. These labor rates are fully loaded and include benefits and overhead costs.

Table 8. Annual Agency Burden and Cost Estimates

COLLECTION ACTIVITY	Burden Hours (per year)			Total	
	Management \$107.56/hr	Technical \$71.58/hr	Clerical \$41.21/hr	Hours	Costs (\$)
Review submitted waiver request and notify requestor of decision	1	20	2	23	1,622
Enter data into tracking systems	0	0	0.5	0.5	21
Verify payment	0	0	0.5	0.5	21
Store/maintain/submit information	0	0	1	1	41
Totals	1	20	4	25	1,704

ANNUAL BURDEN: 25 hours/response x 293 responses = 7,325 Hours

ANNUAL COSTS: \$1610/response x 293 responses = \$471,730

6(d) Bottom Line Burden Hours and Cost Tables

Table 9. Total Annual Respondent and Agency Burden and Costs for Pesticide Product Registration Maintenance Fees

	TOTAL ESTIMATES	
	Burden Hours	Costs
Respondent Burden	1,651	\$129,088
Agency Burden	1,604	\$82,987

Table 10. Total Annual Burden and Cost Estimates for Pesticide Registration Fee Waivers

	TOTAL ESTIMATES	
	Burden Hours	Costs
Type A	1,147	75,733
Type B	2,088	116,406
Type C	2,376	144,408
Total Applicant -Annual (Type A + Type B + Type C)	5,611	336,547
Agency - Annual	7,325	\$471,730

³ All table totals have been rounded to the nearest dollar or hour after all computations were made; in 2008 dollars.

Table 11. Combined Burden for the Pesticide Registration Fees Program ICR

PROGRAMS	TOTAL ESTIMATES	
	Burden Hours	Costs
Pesticide Product Registration Maintenance Fee	1,651	\$129,088
Pesticide Registration Fee Waivers	5,611	\$336,547
Total	7,262	\$465,635

6(e) Reasons for Change in Burden

This is a new ICR, so there are no changes from a previous version of this new ICR. However, the burden for pesticide product registration is the same as in the previous ICR, and there is a decrease in burden from the previous pesticide registration fee waivers ICR.

The total annual burden for respondents associated with pesticide product registration is 1,651 hours. This is the same burden estimate as in the previous ICR renewal. The average time required to complete the maintenance fee filing form depends upon the number of registrants holding product registrations and the number of registrations held by registrants. The number of registrants and the average number of registrations held by registrant has not changed since the previous ICR, thus no shift in the average burden hours was required. Cost increased since the last renewal merely because of labor cost increase.

The total estimated annual respondent burden for the pesticide registration fee waivers information collection has decreased by 2,757 hours, from 8,368 hours in the existing ICR, to 5,611 hours for this renewal. The average estimated burden per response for each of the three types of applications has not changed: 37 hours for Type A, 12 hours for Type B, and 27 hours for Type C. These estimates of burden per response were corroborated by consultations with respondents (see section 3(c) of this supporting statement). However, the total number of responses per year decreased from 389 to 293, and the percentage of the total received for each type changed significantly. Both the total number of waiver requests received, and the number (or percentage) of each of the three types of responses, were based on EPA estimates in the current ICR, as the program was still very new and a year's worth of observations were not available. However in this renewal request, the annual number and distribution of responses among the three types are based on actual responses received. The major shift in the distribution of responses to the least-burdensome type (Type B), resulted in the lower total estimated burden.

6(f) Burden Statement

The annual "respondent" (applicant) burden for the **Pesticide Product Registration Maintenance Fee** program is estimated to average 0.96 hours per form, or per respondent, as there is one form per respondent. The annual public reporting and recordkeeping burden for the collection of information for **Pesticide Registration Fee Waivers** is estimated to average 37, 12, and 27 hours per response, for the three different types of applications. Under PRA,

“burden” is defined at 5 CFR 1320.3(b).

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information that is subject to the PRIA unless the Agency displays a currently valid OMB control number. The OMB control numbers for EPA's regulations in title 40 of the CFR, after initial display in the final rule, are listed in 40 CFR part 9. Since the collection activities in this ICR are contained in the statute and not a current regulation, the OMB control number for this collection activity appeared in the Federal Register, and on the collection instruments.

The Agency has established a public docket for this ICR under Docket ID No. EPA-HQ-OPP-2008-0480, which is available for online viewing at <http://www.regulations.gov>, or in person viewing at the OPP Regulatory Public Docket in Rm. S-4400, One Potomac Yard (South Building), 2777 S. Crystal Drive, Arlington, VA. This docket facility is open from 8:30 a.m. to 4 p.m., Monday through Friday, excluding legal holidays. The docket telephone number is (703) 305-5805. 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-OPP-2008-0480 to (1) EPA online using 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. Since an OMB Control Number has not yet been assigned to this ICR, please include docket ID No. EPA-HQ-OPP-2008-0480 in any correspondence but do not submit any fees or fee waiver requests to these addresses.

ATTACHMENTS TO THE SUPPORTING STATEMENT

All of the attachments listed below can be either found in the docket for this ICR, or a link to the source is provided (unless otherwise noted); accessible electronically through <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-2008-0480** 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: EPA Form 8570-30 - Pesticide Registration Maintenance Fee Filing Form.

Also available electronically at
<http://www.epa.gov/opprd001/forms/8570-30.pdf>

Attachment B The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 4(i)(5). Also available electronically at

<http://www.epa.gov/opp00001/regulating/fifra.pdf>

Attachment C: Worksheet for Estimating OPP ICR Wage Rates for Industry, State and EPA Labor. Attached as part of the public docket identification number

- EPA-HQ-OPP-2010-0049
- Attachment D:** Record of Consultations Between US Environmental Protection Agency and Respondents to the Information Collection Request: “Pesticide Registration Maintenance Fee”
- Attachment E:** Pesticide Registration Improvement Renewal Act of 2007 – Available electronically at
<http://www.epa.gov/pesticides/regulating/fees/index.htm>
- Attachment F:** Implementing the Pesticide Registration Improvement Act – Fiscal Year 2008. Available electronically at
http://www.epa.gov/pesticides/fees/2008annual_report/pria_annual_report_2008.html
- Attachment G:** Record of Consultations Between the U.S. Environmental Protection Agency and Respondents to the Information Collection Request: “Pesticide Registration Fee Waivers”
- Attachment H:** Guidance on How to Request Small Business Fee Waivers. Available electronically at
<http://www.epa.gov/pesticides/fees/questions/waivers.htm>
- Attachment I:** Guidance on IR-4 Exemptions. Available electronically at
http://www.epa.gov/pesticides/fees/questions/guidance_ir-4.htm
- Attachment J:** PRIA 2 fees. Available electronically at
<http://www.epa.gov/pesticides/regulating/fees/tool/category-table.html> and the Federal Register announcement of the current fee schedule is available on <http://www.epa.gov/fedrgstr/EPA-PEST/2008/August/Day-05/p17936.htm>
- Attachment K:** Worksheet for Estimating OPP ICR Wage Rates for Industry, State and EPA Labor is attached below.