

Attachment G

Consultations conducted for the renewal of the Pesticide Registration Fee Waivers;
OMB Control No.: 2070-0167 EPA ICR No.: 2147.04

Company Name: Walter G. Legge Company, Inc.

Name of person consulted: Liz Bauer

Date: 12/10/09

Q: When preparing your waiver request did you consult the Questions and Answers on the EPA website (<http://www.epa.gov/pesticides/fees/questions/waivers.htm>)?

A: Yes

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

A: Not necessary. Hard to find it on the web and, once found it was hard to understand and was redundant.

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

A: Link directly to small businesses on the pesticides web site. Reduce the number of steps to complete a small business waiver request and provide a direct link to pay.gov. EPA not always prompt in returning phone calls when there are questions.

Q: Are you aware of the industry generated form?

A: could not find it.

Q: Would you use the industry generated form (<http://www.cspa.org/pdf/waiver.pdf>)? If no, why not?

After receiving a copy of the form from EPA, used it.

Labor Rates:

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

\$109.82 /hr management; \$60.39 /hr technical staff; \$35.89 /hr clerical

Management prepares small business waiver request. Approx. \$100/hr

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

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

Prepares application – 3 hours provided EPA does not need to be contacted for questions.

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

No technical support in preparing application.

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

No clerical support used.

Q: Did we miss anything?

Comments:

Attachment G.1

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Company Name: Falcon Lab LLC

Name of person consulted: Terry Pizzarello, COO

Date: December 14, 2009

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

A: Yes

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

A: Yes

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

A: No suggestions at this time.

Q: Are you aware of the industry generated form?

A: yes

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

Yes

Labor Rates:

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

\$109.82 /hr management; \$60.39 /hr technical staff; \$35.89 /hr clerical

Do not know – family owned company.

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

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

Management prepares the small business fee waiver request. 2.0 hours for an initial submission during a maintenance fee cycle. Subsequent application in the same year - 0.75 hours

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

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

Q: Did we miss anything?

No

Comments: