

**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.: 2261.02 OMB Control No.: 2070-0171

1(b) Short Characterization

This renewal 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 recognizes 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 is also intended to 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 website 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 website 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 post a statement on their website describing the actions that qualify them for recognition under SDSI. Candidates 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. For environmental benefits, EPA will use Inventory Update Rule¹ 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

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

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 degrades in waters and sediment. Although EPA has not yet evaluated whether there is a correlation between SDSI participation and environmental outcomes, EPA remains committed to measuring the effectiveness of this program over the next three years.

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. When developing the program, 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 to renew this ICR, EPA provided a 60-day public notice and comment period that ended on January 21, 2011 (75 FR 71123, November 22, 2010). EPA received no comments during the comment period.

3(c) Consultations

EPA announced its intentions to develop the SDSI program in February 2006. Since EPA announced the SDSI program in February 2006, 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 included:

Paul Anastas, Green Chemistry Institute

¹ 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.

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 (APEREC), 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 steps 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.

Additionally, under 5 CFR 1320.8(d)(1), OMB requires agencies to consult with potential ICR respondents and data users about specific aspects of ICRs before submitting an ICR to OMB for review and approval. In accordance with this regulation, EPA submitted questions to several parties via email. The individuals contacted were:

Bill Balek
ISSA
bill@issa.com

Beth Law
Consumer Specialty Products Association (CSPA)
blaw@cspa.org

Kathleen Stanton
The American Cleaning Institute
KStanton@cleaninginstitute.org

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](#)

EPA received responses to its solicitation for consultations from Mr. Balek and Ms. Law. A copy of EPA's consultation e-mail to the above nine potential respondents, and the two responses, are included in Attachment C.

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 that 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

This information collection does not include questions of a confidential nature.

3(g) Sensitive Questions

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

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:

NAICS Code Affected Industry

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 submits a SDSI Application Form (EPA Form 6300-2) (see Attachment B for complete form). Forms are 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 website. Applications will be received on an ongoing basis over the three years covered by this ICR. Champion status respondents 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 website 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;
- Commitment statement, on the company's website or other public documents, showing one or more of the following (requirements vary by organization type and 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;
- Total production or use volume of surfactants, where applicable; and
- Signature, name, and title of senior company authority (e.g., CEO or vice president for health and environment).

(ii) Respondent activities:

Candidates post a statement on their website 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; and
- 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 website;
- 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 is committed to evaluating 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 can obtain the SDSI Application Form in hard copy from EPA or by downloading it from the SDSI website. 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 per respondent. 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 with straightforward questions and 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.” Among 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,” it is expected that participants will represent unions, non-profits, or academia.

6(a) Estimating Respondent Burden

The average respondent burden is estimated to be 10 hours per respondent. EPA used professional judgment to arrive at a burden estimate and then consulted representatives from the participant categories to evaluate whether 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, the 10 hours of respondent burden will be distributed as follows:

- 1 hour - program and application review (technical staff)
- 3 hours - Obtain approval, which is likely to involve verifying assumptions with staff and ensuring support from multiple levels of management
 - 1 hr. managerial time, 1 hr. technical staff time, 1 hr. clerical staff time.
- 5 hours - Complete the application form
 - 4 hrs. technical staff time, 1 hr. clerical staff time)
- 1 hour - Post information on a company website (technical staff).

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, and each audit will take about 8 hours. This burden, when distributed among all participants, is about 57 minutes per participant ((8 hrs x 5 participants) / 42 total participants).

6(b) Estimating Respondent Costs

EPA estimates an average hourly labor rate (base hourly rate plus fringe and overhead) of \$70 for managerial staff, \$61 for technical staff, and \$29 for clerical staff. These three labor rate estimates are taken from the Office of Personnel Management 2010 General Schedule salary table¹ 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 42 applications will be submitted over the three-year life of the clearance. This estimate is based on the actual number of SDSI applications submitted over the last three years (84 applications). It is estimated that EPA will receive about one half as many applications (or 42 applications) over the three-year cycle of this ICR, based on the assumption that many companies in the potential universe of respondents have either already applied or have decided not to participate. Over the next three years, EPA expects additional companies will apply that may not have previously heard of SDSI or who have only recently met the criteria for Champion or Partner. Furthermore, based on past experience with SDSI, EPA estimates that the vast majority of participants will be formulators, along with a small number of chemical manufacturers, retailers / distributors, institutional purchasers, and others. The total burden hours and labor costs associated with this information collection over the three-year cycle are 420 hours and \$23,310, respectively (see Exhibit 6.1). The annual burden and costs, therefore, are 140 hours and \$7,770. This ICR does not impose capital or O&M costs.

¹ OPM 2010 General Schedule Salary Table, available at http://www.opm.gov/oca/10tables/pdf/g_s_h.pdf

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 this collection and 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 \$62 for managerial staff, \$46 for technical staff, and \$21 for clerical staff.⁹ The Agency expects most activities to be performed by managerial staff (25 percent) and technical staff (75 percent).

⁹ EPA labor costs are based on annual federal wage rates published by the Office of Personnel Management for the 2010 General Schedule (Base) Pay Tables. These three labor rates were estimated using the following GS-levels: GS-13 Step-5 for managerial staff (\$38.92/hour), GS-10 Step-10 for technical staff (\$28.51/hour), and GS-5 Step-1 for clerical staff (\$13.10/hour). http://www.opm.gov/oca/10tables/pdf/g_s_h.pdf

Exhibit 6.1. Estimated Burden and Costs to Respondents²

Type of Affected Public	Collection activity		Estimated burden per response (hours)			Total burden (hours)				Hourly labor cost			Total labor cost
			M	T	C	M	T	C	Total	M	T	C	
Private Sector	Chemical Manufacturers	1											
	▪ Review application and program information		0	1	0	0	1	0	1	\$70	\$61	\$29	\$61
	▪ Obtain senior approval		1	1	1	1	1	1	3	\$70	\$61	\$29	\$160
	▪ Complete and submit package ³		0	4	1	0	4	1	5	\$70	\$61	\$29	\$273
	▪ Post information on website		0	1	0	0	1	0	1	\$70	\$61	\$29	\$61
	Subtotal	1	1	7	2	1	7	2	10	--	--	--	\$555
	Formulators	32											
	▪ Review application and program information		0	1	0	0	32	0	32	\$70	\$61	\$29	\$1,952
	▪ Obtain senior approval		1	1	1	32	32	32	96	\$70	\$61	\$29	\$5,120
	▪ Complete and submit package ⁶		0	4	1	0	128	32	160	\$70	\$61	\$29	\$8,736
	▪ Post information on website		0	1	0	0	32	0	32	\$70	\$61	\$29	\$1,952
	Subtotal	32	1	7	2	32	224	64	320	--	--	--	\$17,760
	Institutional Purchasers	4											
	▪ Review application and program information		0	1	0	0	4	0	4	\$70	\$61	\$29	\$244
	▪ Obtain senior approval		1	1	1	4	4	4	12	\$70	\$61	\$29	\$640
	▪ Complete and submit package ⁶		0	4	1	0	16	4	20	\$70	\$61	\$29	\$1,092
	▪ Post information on website		0	1	0	0	4	0	4	\$70	\$61	\$29	\$244
	Subtotal	4	1	7	2	4	28	8	40	--	--	--	\$2,220
	Retailers/Distributors	1											
	▪ Review application and program information		0	1	0	0	1	0	1	\$70	\$61	\$29	\$61
▪ Obtain senior approval		1	1	1	1	1	1	3	\$70	\$61	\$29	\$160	
▪ Complete and submit package ⁶		0	4	1	0	4	1	5	\$70	\$61	\$29	\$273	
▪ Post information on website		0	1	0	0	1	0	1	\$70	\$61	\$29	\$61	
Subtotal	1	1	7	2	1	7	2	10	--	--	--	\$555	
Private Sector and Local Government	Others (e.g. non-profits, unions, academia)	4											
	▪ Review application and program information		0	1	0	0	4	0	4	\$70	\$61	\$29	\$244
	▪ Obtain senior approval		1	1	1	4	4	4	12	\$70	\$61	\$29	\$640
	▪ Complete and submit package ⁶		0	4	1	0	16	4	20	\$70	\$61	\$29	\$1,092
	▪ Post information on website		0	1	0	0	4	0	4	\$70	\$61	\$29	\$244
	Subtotal	4	1	7	2	4	28	8	40	--	--	--	\$2,220
Total (3 years)	42							420				\$23,310	

² This ICR does not impose capital or OEM costs.

³ Includes burden of verifying data (about 8 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 57 minutes per participant ((8 hrs x 5 participants) / 42 total participants).

Exhibit 6.2. Derivation of Respondent Loaded Labor Rates using Q2 2010 Data

Labor Category	Data Sources ^a	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”	\$43.06	\$19.31	44.84%	17.00%	1.618	\$69.69
Professional/ Technical	BLS ECEC, Private Manufacturing industries , “Professional and related”	\$36.31	\$18.08	49.79%	17.00%	1.668	\$60.56
Clerical	BLS ECEC, Private Manufacturing industries , “Office and Administrative Support”	\$17.27	\$8.48	49.10%	17.00%	1.661	\$28.69

Notes:

^a (BLS, 2010). <http://www.bls.gov/ncs/ect/sp/ecsuptst.pdf> Bureau of Labor Statistics, *Employer Costs for Employee Compensation – December 2006-June 2010*, "Table 2: Private Manufacturing Industry Workers, by occupational group, employer costs per hours worked for employee compensation and costs as a percentage of total compensation"

^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 ^a		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	\$62	\$46	\$434	\$1,058	30	\$1,492
Answer questions	7	23	\$62	\$46	\$434	\$1,058	30	\$1,492
Record / enter forms	10	30	\$62	\$46	\$620	\$1,380	40	\$2,000
Verify information; Make awards selection	12	38	\$62	\$46	\$744	\$1,748	50	\$2,492
Notify applicants of decision	3	9	\$62	\$46	\$186	\$414	12	\$600
Total	39	123	--	--	\$2,418	\$5,658	162	\$8,076

^a As seen in footnote 9, labor cost per hour is a loaded wage. The General Schedule hourly wage is inflated by an overhead factor of 1.60.

6(e) Bottom Line Burden Hours and Cost Tables

a. Respondent Tally

Exhibit 6.4. Estimated Total Respondent Burden and Cost Summary

Total Number of Respondents	Total Burden Hours	Total Labor Cost
42 (3 years)	420 (3 years)	\$23,310 ^a (3 years)
14 (annual)	140 (annual)	\$7,770 (annual)

^aThis ICR incurs no capital or O&M costs.

b. Agency Tally

Exhibit 6.5. Average Estimated Agency Burden and Cost Summary

Burden Hours	Total Labor Cost
162	\$8,076

6(f) Reasons for Change in Burden

There is a decrease of 3,610 hours (from 3,750 hours to 140 hours) in the total estimated annual respondent burden compared with that identified in the information collection most recently approved by OMB. This decrease reflects improved estimates of the number of applications EPA expects to receive, based on actual experience in administering the SDSI program. The change is an adjustment.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 10 hours per response, including time for reviewing instructions, gathering information, and completing and reviewing the application. Burden is defined in 5 CFR 1320.3(b). An Agency may not conduct or sponsor such a request and a person or facility is not required to respond to a collection of information unless it displays a currently valid OMB control number. 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.

To comment on 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, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OPPT-2010-0874. The docket is available for public viewing at the Pollution Prevention and Toxics Docket in the EPA Docket Center (EPA/DC). The EPA/DC Public Reading Room is located in the EPA West Building, Room 3334, 1301 Constitution Ave., NW., Washington, DC. The EPA/DC 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 EPA/DC Public Reading Room is (202) 566-1744, and the telephone number for the Pollution Prevention and Toxics Docket is (202) 566-0280. An electronic version of the public docket is available at www.regulations.gov. Use FDMS to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OPPT-2010-0874 and OMB Control Number 2070-0171 in any correspondence.

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-2010-0874. 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 online at the U.S. House of Representatives' Office of the Law Revision Counsel's [U.S. Code website](#)

Attachment B: **EPA Form 6300-2 – Safer Detergent Stewardship Initiative Application Form and Instructions**

Attachment C: **Copy of Consultations Message Sent to Potential Respondents Responses to Consultations Message**

February 7, 2011

OMB Control Number 2070-171; EPA ICR Number 2261.02

ATTACHMENT A

**Pollution Prevention Act Section 6604
42 U.S.C. 13103**

SEC. 6604. EPA ACTIVITIES.

(a) **AUTHORITIES.**—The Administrator shall establish in the Agency an office to carry out the functions of the Administrator

under this subtitle. The office shall be independent of the Agency’s single-medium program offices but shall have the authority to review and advise such offices on their activities to promote a multimedia approach to source reduction. The office shall be under the direction of such officer of the Agency as the Administrator shall designate.

(b) **FUNCTIONS.**—The Administrator shall develop and implement a strategy to promote source reduction. As part of the strategy, the Administrator shall—

- (1) establish standard methods of measurement of source reduction;
- (2) ensure that the Agency considers the effect of its existing and proposed programs on source reduction efforts and shall review regulations of the Agency prior and subsequent to their proposal to determine their effect on source reduction;
- (3) coordinate source reduction activities in each Agency Office and coordinate with appropriate offices to promote source reduction practices in other Federal agencies, and generic research and development on techniques and processes which have broad applicability;
- (4) develop improved methods of coordinating, streamlining and assuring public access to data collected under Federal environmental statutes;
- (5) facilitate the adoption of source reduction techniques by businesses. This strategy shall include the use of the Source Reduction Clearinghouse and State matching grants provided in this subtitle to foster the exchange of information regarding source reduction techniques, the dissemination of such information to businesses, and the provision of technical assistance to businesses. The strategy shall also consider the capabilities of various businesses to make use of source reduction techniques;
- (6) identify, where appropriate, measurable goals which reflect the policy of this subtitle, the tasks necessary to achieve the goals, dates at which the principal tasks are to be accomplished, required resources, organizational responsibilities, and the means by which progress in meeting the goals will be measured;
- (8) 1 establish an advisory panel of technical experts comprised of representatives from industry, the States, and public interest groups, to advise the Administrator on ways to improve collection and dissemination of data;
- (9) establish a training program on source reduction opportunities, including workshops and guidance documents, for State and Federal permit issuance, enforcement, and inspection officials working within all agency program
- (10) identify and make recommendations to Congress to eliminate barriers to source reduction including the use of incentives and disincentives;
- (11) identify opportunities to use Federal procurement to encourage source reduction;
- (12) develop, test and disseminate model source reduction auditing procedures designed to highlight source reduction opportunities; and
- (13) establish an annual award program to recognize a company or companies which operate outstanding or innovative source reduction programs.

February 7, 2011

OMB Control Number 2070-0171; EPA ICR Number 2261.02

ATTACHMENT B

**Safer Detergent Stewardship Initiative
Application Form and Instructions**



Safer Detergents Stewardship Initiative Instructions for Application Form

EPA developed the Safer Detergents Stewardship Initiative (SDSI) to recognize environmental leaders who voluntarily commit to the use of safer surfactants. Leading product manufacturers have made great progress in developing safer, highly effective cleaners. These manufacturers believe that producing the safest products possible is important to their role as stewards of the environment and public health. A number of U.S. corporations have acted in advance of SDSI to use safer surfactants in their entire product lines.

Safer surfactants are surfactants that break down quickly to non-polluting compounds⁴. CleanGredients™ is a resource for information on safer surfactants (www.cleangredients.org).

To be eligible for recognition under SDSI, candidates should do the following:

- o Complete this application and have it signed by a company authority (e.g., CEO or vice president for health and environment).
- o Post a statement on their website describing the actions that qualify them for recognition under SDSI.

EPA reserves the right to request at any time, on a confidential basis, appropriate documentation (including but not limited to bills of lading, invoices, material safety data sheets, and list of ingredients) to confirm that candidates have achieved the appropriate criteria for recognition. If documentation is requested but not received within a reasonable time, EPA may deny or withdraw recognition from that candidate.

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 the SDSI Awards ceremony, listed on the EPA SDSI website 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 website and may be granted recognition as a Champion in the future, if appropriate. Partner recognition will sunset on the commitment date provided in Section 3 of the Application.

Guidelines for achieving Champion or Partner Status are provided in Table 1. Both Champions and Partners will receive a certificate of recognition from DfE.

Application Process: The application is available online and may be filled out and submitted in hard copy by mail or scanned and emailed to SDSI@epa.gov. Unless you claim information as confidential, all applications received will be considered public information and no materials submitted will be returned. For security purposes, confidential information should not be submitted electronically. If you choose to send the application

⁴ An example of a class of safer surfactants is linear alcohol ethoxylates (LAE). LAEs are toxic to aquatic life, but break down quickly to non-polluting compounds. Nonylphenol ethoxylates, commonly referred to as NPEs, are a surfactant class that does not meet the definition of a safer surfactant. Both NPEs and their breakdown products, such as nonylphenol, are toxic to aquatic life.

February 7, 2011

electronically, the application and signed signature page must be scanned and sent to SDSI@epa.gov.

If you choose to submit a hard copy application, send your completed application via regular / certified mail or overnight mail to the following address:

Safer Detergent Stewardship Initiative
Attn: Emily Connor
4550 Montgomery Avenue, Suite 800
North
Bethesda, MD 20814-5341
301-347-5197

Confirmation of Receipt: EPA will confirm receipt of applications, usually by email. If you have not received an acknowledgment within two weeks of sending your applications, please contact David Difiore at SDSI@epa.gov or 202-564-8786

Notification: Winners will be notified prior to the official public announcement. Awards will be presented to the primary sponsor of the application.

Questions: Questions about eligibility, nomination procedures, or the Safer Detergent Stewardship Initiative should be directed to David Difiore of EPA's Design for the Environment Program at SDSI@epa.gov or 202-564-8796

Paperwork Burden Estimate

The public reporting and recordkeeping burden for this collection of information is estimated to average 10 hours per response, including the time for reviewing instructions, gathering information, posting information to the internet, and reviewing and completing the application. 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 collection is 2070-0171. Approval expires on 03/31/2011.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence.

Do not send the completed application to this address.

Participant Type	Table 1: Guidelines for Achieving:	
	Champion Status	Partner Status
Chemical Manufacturers	<ul style="list-style-type: none"> ▪ Demonstrate that you only manufacture safer surfactants ▪ Document a strategy for ensuring that you manufacture only safer surfactants 	<ul style="list-style-type: none"> ▪ Commit to manufacturing only safer surfactants by a date that is reasonable for your circumstances ▪ Document a strategy for ensuring that you will manufacture only safer surfactants
Formulators	<ul style="list-style-type: none"> ▪ Demonstrate that you only use safer surfactants in products ▪ Document a strategy for ensuring that only safer surfactants are used in products 	<ul style="list-style-type: none"> ▪ Commit to using only safer surfactants in your products by a date that is reasonable for your circumstances ▪ Document a strategy for ensuring that only safer surfactants will be used in products
Retailers / Distributors	<ul style="list-style-type: none"> ▪ Demonstrate that only safer surfactants are included in products intended for sale ▪ Document a strategy for ensuring that only safer surfactants are included in products intended for sale 	<ul style="list-style-type: none"> ▪ Commit to sell only products containing safer surfactants by a date that is reasonable for your circumstances ▪ Document your active encouragement of the use of safer surfactants
Institutional Purchasers	<ul style="list-style-type: none"> ▪ Demonstrate that you only purchase products containing safer surfactants ▪ Document a strategy for ensuring that purchased products only contain safer surfactants 	<ul style="list-style-type: none"> ▪ Commit to only use products that only contain safer surfactants by a date that is reasonable for your circumstances ▪ Document your active encouragement of the use of safer surfactants
Others (e.g., non-profits, unions, academia)	<ul style="list-style-type: none"> ▪ Demonstrate outstanding efforts to encourage the use of safer surfactants 	<ul style="list-style-type: none"> ▪ Document your active encouragement of the use of safer surfactants

Additional notes about Table 1 guidelines:

- CleanGredients™ is a resource for information on safer surfactants.
- The SDSI participation deadline for using only safer surfactants in third-party finished goods and Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)-registered products is May 30, 2009.
- Products include those whose use routinely results in their discharge to the environment (e.g., all-purpose cleaners, laundry detergents, pesticides, airplane de-icers, fire-fighting foams and gels).
- An example of a strategy is a letter that is sent to suppliers requiring them to provide products with only safer surfactants. The retailer/distributor or institutional purchaser will not be eligible for Champion recognition until only safer surfactants are sold or purchased.
- Examples of efforts that would qualify include developing means for surfactant users to identify safer surfactants, taking action to educate industry or the public about safer surfactants, and encouraging business to move toward safer surfactants.



United States
Environmental Protection
Agency

SECTION 1a:
Enter requested
information for the
authorized
representative

Organization Name	
Contact Name	
Address	
Address	
Phone	Fax
Email	
Website	

SECTION 1b:
Indicate your type
of organization

<input type="checkbox"/>	Chemical Manufacturer - Manufactures surfactants
<input type="checkbox"/>	Formulator - Purchases and blends chemicals (including surfactants) to create an end-use product for retailers and/or distributors
<input type="checkbox"/>	Retailer / Distributor - Sells products containing surfactants
<input type="checkbox"/>	Institutional Purchaser - Purchases or specifies cleaning products for use in multiple facilities (e.g., janitorial service provider)
<input type="checkbox"/>	Other - Influences use of surfactants (e.g., non-profit, trade association, academia)

SECTION 1c:
Indicate the level
of recognition for
which you are
applying (refer to
the instructions for
a description of
Champion and
Partner status for
each organization
type)

<input type="checkbox"/>	Champion (go to Section 2)
<input type="checkbox"/>	Partner (go to Section 3)

SECTION 2:
Fill out this section if
you are applying for
recognition as a
Champion

If you are a...	Demonstrate in SECTION 2a that...	And then go to...
Chemical Manufacturer	You only manufacture safer surfactants	Section 2b
Formulator	You only use safer surfactants in products	Section 2b
Retailer / Distributor	Only safer surfactants are included in products intended for sale	Section 2c
Institutional Purchasers	All the products you purchase contain only safer surfactants	Section 2c
Other	You have made outstanding efforts to encourage the use of safer surfactants	Go to Section 4

SECTION 2a:
Use this space to
explain how you meet
the above
requirements.
Please include
supporting documents
when appropriate and
note these documents
in your statement. You
may attach extra
sheets as needed.

To be eligible for
recognition,
candidates should post
a statement on their
website stating that
they manufacture,
use, or purchase
products containing
only safer surfactants.
Use this space to
provide the URL for
that section of your
website describing the
actions that qualify
you for recognition:

SECTION 2b (Chemical Manufacturers and Formulators only):
Indicate or describe your product stewardship strategy for ensuring the manufacture or use of safer surfactants

- Use CleanGredients to choose surfactants
- Other, please describe⁵:

SECTION 2c (Retailers/ Distributors and Institutional Purchasers only):
Document your strategy for ensuring that all of your purchased products contain only safer surfactants. You may attach extra sheets as needed.*

If you are a...	Document a strategy for ensuring that...
Retailer / Distributor	Only safer surfactants are included in products intended for sale
Institutional Purchaser	Purchased products contain only safer surfactants

* An example of a strategy would be the establishment of a policy that requires suppliers to provide products that contain only safer surfactants. This strategy may be evidenced by a letter that is sent to suppliers requiring them to provide products with only safer surfactants, or a comparable statement posted on a company's website. The retailer / distributor will not be eligible for Champion recognition until it sells products with only safer surfactants.

⁵ For SDSI recognition, your strategy description should include an explanation of your due diligence in selecting safer surfactants. Along with the non-use of NPE surfactants, examples of due diligence include: Only using surfactants from CleanGredients (www.cleangredients.org); only using surfactants that meet the DfE or CleanGredients surfactant screens (see DfE screen at <http://www.epa.gov/dfe/pubs/projects/gfcp/index.htm>); or only using surfactants that meet criteria similar to the DfE or CleanGredients screens (e.g., the EU Detergents Directive). In addition, a description of in-house criteria that ensures the use of safer surfactants may also qualify as due diligence.

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SECTION 3:
Fill out this section if you are applying for recognition as a Partner

If you are a...	Document in SECTION 3a your commitment to...
Chemical Manufacturer	Produce only safer surfactants
Formulator	Use only safer surfactants in your products
Retailer / Distributor	Only sell products that only contain safer surfactants
Institutional Purchasers	Only purchase products that only contain safer surfactants
Other (e.g., trade association, NGO, etc.)	encouragement of safer surfactants

SECTION 3a:
Use this space to describe how you meet the above requirements.*

To be eligible for recognition, candidates should post a statement on their website stating their commitment to completely transitioning to safer surfactants. Use this space to provide the URL for that section of your website describing the actions that qualify you for recognition:

* You should describe your commitment to a complete transition to safer surfactants by a date that is reasonable for your circumstances. Please state this date explicitly and explain briefly why it is a reasonable date for your circumstances.⁶ Include supporting materials when appropriate and note these materials in your statement. You may attach extra sheets as needed.

⁶ Please note that Partner recognition will sunset on the commitment date. After this date, companies will need to apply for Champion recognition.

SECTION 4:
Certification of
Application

Please have the appropriate company authority (e.g., CEO, vice president for health and environment, division head, or other authorized signatory) sign here to verify the accuracy of the application's content.

Signature of Authorizing Entity	Date
Printed Name and Title	Date

I hereby affirm that the contents of this application are true and accurate to the best of my knowledge, and that I am an authorized representative of the company or organization named above and am duly authorized to sign this application.

OMB Control Number 2070-171; EPA ICR Number 2261.02

ATTACHMENT C

**Copy of Consultations Message Sent by EPA to Potential Respondents
Responses to Consultations Message**

January 10, 2010

Hello,

I'm writing from Abt Associates on behalf of the U.S. Environmental Protection Agency's Design for the Environment (DfE) Program. We're currently supporting DfE in conducting research on the burden associated with its Safer Detergents Stewardship Initiative (SDSI). The Paperwork Reduction Act requires that federal agencies re-evaluate every three years the recordkeeping and reporting burden associated with information collection requests of this nature.

As a potential respondent, we would value your feedback about the burden associated with SDSI to ensure that our estimates are reasonable.

Attached below is a copy of the Information Collection Request (ICR) for SDSI. For your reference, here is a link to the federal register notice:
<http://www.federalregister.gov/articles/2010/11/22/2010-29393/agency-information-collection-activities-proposed-collection-comment-request-safer-deterg>

Please give particular attention to Section 6 of the ICR, which includes burden estimates associated with SDSI participation. When reviewing, please consider the following questions:

(i) is the proposed collection of information necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility?

(ii) are the Agency's estimates of the burden of the proposed collection of information, including the validity of the methodology and assumptions used, reasonable and accurate?

(iii) could the quality, utility, and clarity of the information to be collected be improved?

We would greatly appreciate your feedback on the above items and also value your suggestions for future improvements to SDSI. Please send me any comments or feedback by Friday, January 21.

Thanks in advance for your time and assistance!

Sincerely,

Emily Connor
Environment and Resources Division
Abt Associates, Inc.
4550 Montgomery Avenue, Suite 800 North
Bethesda, MD 20814
301.347.5197

From: "Bill Balek" <BILL@issa.com>
To: "Emily Connor" <Emily_Connor@abtassoc.com>
Cc: difiore.david@epa.gov, davies.clive@epa.gov>
Subject: RE: Request for feedback on DfE's Safer Detergents Stewardship Initiative
Date: January 21, 2010 11:39 AM

Dear Ms. Connor:

Thank you for the reminder. ISSA has reviewed the ICR and our response is as follows.

As a preface, ISSA is a non-profit trade association that represents the commercial and institutional cleaning industry. Our membership consists of 5,500 member companies including manufacturers and distributors of cleaning products as well as those who provide cleaning services. ISSA and a number of our member companies participated in SDSI a few years ago when DfE first launched this initiative. Our answers below are based on this prior experience as well as our understanding of the industry in general.

1. The proposed collection of information is critical to the operation of the SDSI program. The information collected is essential in determining the extent to which manufacturers and other companies transition to the use of safer surfactants. Consequently, the contemplated information is pivotal in measuring the overall effectiveness and success of the SDSI program.

2. ISSA believes that the estimates set forth in the ICR regarding the burden of the proposed collection of information are reasonable and accurate. Based on ISSA's own experience in participating in SDSI and that of our member companies, the estimates are reasonable in terms of the assumptions made, estimated costs, time and other resources that would be expended by participants in SDSI.

3. At the present, we cannot think of any way to improve the quality, utility or clarity of the information that is to be collected. However, ISSA looks forward to the opportunity to work with DfE and other stakeholders to implement the next phase of SDSI in a manner that maximizes its impact on helping companies and others transition to safer surfactants.

If you require any clarification regarding the above information, please do not hesitate to contact me.

Sincerely,
Bill Balek, ISSA
800.225.4772

From: "Beth Law" <BLaw@cspa.org>
To: "Emily Connor" <Emily_Connor@abtassoc.com>
Cc: Difiore.David@epamail.epa.gov
Subject: CSPA Feedback on DfE's SDSI Program
Date: January 31, 2011 04:09 PM

Ms. Connor, the Consumer Specialty Products Association (CSPA) is the premier trade association representing the interests of approximately 240 companies engaged in the manufacture, formulation, distribution and sale of approximately \$80 billion annually in the U.S. of hundreds of familiar consumer products that help household and institutional customers create cleaner and healthier environments. Our products include disinfectants that kill germs in homes, hospitals and restaurants; candles, and fragrances and air fresheners that eliminate odors; pest management products for home, garden and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day. Given this broad array of products, we are very interested in the programs administered by the U.S. EPA Design for the Environment and are pleased to provide feedback on the SDSI program.

CSPA believes that the estimates in the ICR regarding the burden of the proposed collection of information and the assumptions upon which they are based are reasonable and accurate. If additional information would be helpful, I would be pleased to provide it.

Beth Law
Assistant General Counsel/Vice President,
International Affairs

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Washington, DC 20006

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