

ATTACHMENT E

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

1. Ples Spradley, Associate Professor – Pesticide Safety Education, University of Arkansas, Division of Agriculture
2. Gary Fish, Program Manager, State of Maine, Department of Agriculture, Board of Pesticides Control
3. Adolfo R. Gallo, Program Specialist, Program Specialist
California Department of Pesticide Regulation (DPR), Licensing and Certification Program

For anthrax-related products:

4. Stanley Trout, Director of Mfg. Operations, sBioMed LLC

Consultation Questions

EPA/OPP ICR - Certification of Pesticide Applicators

OMB No: 2070-0029; EPA No: 0155.09

Contact information

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

Name: Ples Spradley

Title: Associate Professor – Pesticide Safety Education

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Questions regarding the ICR document

(1) Publicly Available Data

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

Not that I am aware of.

If yes, where can one find the data?

(2) Frequency of collection

Can the Agency collect the information less frequently and still produce the same outcome?

In my opinion, no.

(3) Clarity of Instructions

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

Yes.

Do you understand what records need to be kept?

Yes.

Are submission formats clear and logical?

Yes.

(4) Electronic Reporting and Record keeping

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

Yes, based on my knowledge of CPARD.

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

Not applicable to my position.

(5) Burden and Costs

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

The estimates seem realistic to me.

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

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

Yes.

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

No.

Consultation Questions
EPA/OPP ICR - Certification of Pesticide Applicators

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Questions regarding the ICR document

(1) Publicly Available Data

Is the information that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency? Not that I know of

If yes, where can one find the data?

(2) Frequency of collection

Can the Agency collect the information less frequently and still produce the same outcome? Possibly, but it would not provide the same picture and it would become outdated faster

(3) Clarity of Instructions

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

Do you understand what records need to be kept? yes

Are submission formats clear and logical? yes

(4) Electronic Reporting and Record keeping

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

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

(5) Burden and Costs

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

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

The Agency has assumed there is no capital cost associated with this activity. Is that correct? No, unless the agency/organization is extremely small

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

Contact information

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

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Questions regarding the ICR document

(6) Publicly Available Data

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

A) Yes, the agencies that provide information to DPR for reporting via CPARD could also provide that same information upon request to any interested person or government agency.

Q) If yes, where can one find the data?

A) It can be requested from each agency that provides the information to DPR.

(7) Frequency of collection

Q) Can the Agency collect the information less frequently and still produce the same outcome?

A) Yes; the state reporting agencies can provide accurate and timely information biannually to US EPA. US EPA could stagger reporting deadlines within the regions to ease reviewing and assessment burdens. Biannual reporting and analysis would have minimal impact on decisions and actions regarding states' programs. We assume that collecting the information less frequently would not adversely impact the funding formula, reduce the cooperative agreement reimbursement level, or disrupt the cooperative agreement funding process.

(8) Clarity of Instructions

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

A) Yes, for the most part, over the years the written instructions and guidelines have become clearer to understand. However, any annual changes to the CPARD template should be identified and summarized in a written document and online at the CPARD log in page.

Q) Do you understand what records need to be kept?

A) Yes

Are submission formats clear and logical?

Q) Mostly, yes.

(9) Electronic Reporting and Record keeping

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

A) Yes, for the most part. However, any changes to the CPARD template should be identified and summarized in a written document sent to each SLA CPARD/State Plan manager and also posted online at the CPARD log in page. These changes would include different or additional reporting requirements, revised information formats, additional check/mark boxes, more detailed requested information, etc.

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

A) The CPARD system saves time and effort, especially with standardized information format, saves time over the narrative report format, and time is saved with the “copy and transfer to the next year report” feature, which is pretty sweet.

(10) Burden and Costs

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

A) Close, but not accurate; our data is presented in Table DPR-1 that follows.

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

A) Estimate costs are based on estimated staff time and accurate staff costs.

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

A) Correct.

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

A) None to suggest at this time.

Table DPR-1 – DPR Burden and Cost Estimates for Annual Information Reporting and Maintaining Certification and Training Program State Plan on CPARD

Collection Activities	Annual Burden Hours Per Respondent		TOTALS
	Program Specialist \$44.05/hr	Staff Services Analyst \$32.83/hr	
Read/hear rule or any collective instrument instruction (incl. compliance determination)	2	0	2
Create information	1	0	1
Gather information	8	4	12
Process, compile, review info for accuracy	4	1	5
Complete written forms or other instruments	2	0	2
Record, disclose, display, or report the information	24	1	25
Store, file, or maintain the information	2	0	2
DPR TOTAL HOURS reporting on CPARD	43 X 44.05 = \$1,894.15	6 X 32.83 = \$196.98	(43 X 44.05) + (6 X 32.83) = \$2,091.13
DPR TOTAL COSTS reporting on CPARD	\$1,894.15	\$196.98	\$2,091.13

Consultation Questions
EPA/OPP ICR - Certification of Pesticide Applicators
Anthrax-Related Products

OMB No: 2070-0029; EPA No: 0155.09

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Questions regarding the ICR document

(11) Publicly Available Data

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

NO. The information that is required of a registrant for an anthrax decontamination product will only be maintained by the registrant.

If yes, where can one find the data?

(12) Frequency of collection

Can the Agency collect the information less frequently and still produce the same outcome? **There is no collection schedule with anthrax decontamination products. Data should be current at any given time. Names of those trained as well as those that product is sold to should be available at any given notice.**

(13) Clarity of Instructions

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

Do you understand what records need to be kept? **Yes, it is quite clear on what information is required from a registrant for an anthrax decontamination product. Basically those that are trained and those that buy the product. Those should almost always be one in the same.**

Are submission formats clear and logical?

(14) Electronic Reporting and Record keeping

Are the Agency web-based reporting tools working well? What improvements would you suggest for the reporting templates? **I believe there are no web based tools for registrants selling anthrax decontamination products.**

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

(15) Burden and Costs

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

Labor rates and burden hours have accurately been defined with respect to registrants training and keeping records for those that receive training as well as those that purchase product.

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

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

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