

# **The Supporting Statement for OMB 0596-0182**

## **Qualified Product List for Wildland Fire Chemicals**

**(Formerly: Qualified Products List for Water Enhancers (Gels) for Wildland Firefighting)**  
**November 2011**

**PLEASE NOTE:** This renewal submission for 0596-0182, includes the merging of information collection 0596-0183, "Qualified Products List for Class A Foams for Wildland Firefighting", and 0596-0184, "Qualified Products List for Long-Term Retardants for Wildland Firefighting". The burden and forms associated with all three OMB approved Information Collections are represented in this Supporting Statement and ROCIS submission. Upon approval of this consolidation, control numbers 0596-0183 and 0596-0184 will be discontinued.

### **A. Justification**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

#### **Laws, Statutes, and Regulations**

- Forest Service Manual (FSM) 5162 – Fire Management Equipment and Supplies

The policy of the Forest Service is stated in Forest Service Manual (FSM 5162.03), "Use only evaluated, approved and qualified fire chemicals." This policy requires the Agency to evaluate all wildland fire chemicals before use in fire management activities on lands managed by the FS. Additionally, the Agency needs "to have available and utilize adequate types and quantities of qualified fire chemical products to accomplish fire management activities safely, efficiently, and effectively." To accomplish this objective, the Forest Service evaluates fire chemical products available for use in direct wildland-fire management operations prior to such use on lands managed by the Agency. (FSM 5162.02, 5162.03)

Safe products do not contain ingredients that create an increased risk to firefighters or the public in typical use. The basis for decisions regarding product effects is acute toxicity determinations of the products, as well as a review of lists of known and suspected carcinogens. The safety of firefighters' equipment, either ground-based or aircraft, is also considered (i.e., uniform and intergranular corrosion tests, effects on non-metallic materials, etc.).

Safety to the environment in terms of aquatic (fish, clean water) and terrestrial environments (wildlife, plants) is also considered. Acute toxicity tests identify potential acute toxicity concerns. Risk-determinations assist in identifying products that with typical use do not increase danger to the environment.

Effectiveness tests for long-term fire retardants measure a product's ability to reduce fire spread and intensity even after the water has evaporated.

Effectiveness tests for Class A foams include measure the relationships between the amount of the foam concentrate in water and the resulting wetting and foaming ability and the stability of the resulting foam.

Effectiveness tests for water enhancers (gels) include measure the relationships between the amount of the concentrate in water and the resulting viscosity and

cohesiveness and the stability of these characteristics.

The product concentrate and mixtures of product concentrates and water are assessed to determine whether the product can be stored, mixed, and used with readily existing facilities and equipment as typical in wildland fire operations.

Finally, evaluation and qualification of products is based upon meeting the standards identified in the appropriate fire chemical specification.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

**a. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)**

The following information is collected:

**1) The Manufacturer's Safety Data Sheet (MSDS)** for the product(s) submitted for testing as well as the manufacturer's MSDSs for each of the individual ingredients incorporated in the product (available from the ingredient supplier/manufacturer), shall be provided by the individual or company submitting a product(s) for evaluation.

**2) Form FS-5100-32, Water Enhancer (Gel) Formulation Disclosure Sheet**

- Product name
- Formulation identification
- Submitting company
- Date submitted
- Submitted by (name and signature)
- Title of submitter
- Recommended mix ratio range
- Formulation ingredients (including water, and using common chemical name)
- Whether the ingredient or supplier is proprietary (if proprietary, explanation is required)
- Manufacturer, process, and quality/grade
- Chemical Abstract Services (CAS) number or other technical identification (must be accepted industry standard)
- Percent by weight in wet or dry concentrate
- Percent by weight in solution across the recommended use-level range
- Patent or Trade Mark number (and copy of the patent)
- Remarks

**3) FS-5100-33, Water Enhancer (Gel) Technical Data Sheet**

- Product name
- Submitting company
- Formulation identification
- Mix ratio range
- Physical properties of the concentrate (if liquid) and mixed product
- Recommended method for the laboratory preparation of the product

(including equipment, techniques, and precautions), attach laboratory bulletin if needed

- Recommended methods for field mixing, handling, package, and proposed hardware; attach equipment bulletin if available.

**4) FS-5100-34, Water Enhancer (Gel) Technical Data Sheet - Thickened Products**

- Product name
- Submitting company
- Formulation identification
- Mix ratio range
- If submitted product is result of a chemical reaction, provide information explaining the reaction process and typical residual quantities of the reaction ingredients.
- Data, graphs or tables (as indicated) for each mix ratio being evaluated:
  - o Water-enhancer mixture viscosity versus time since mixing, at a temperature of 70 degrees Fahrenheit;
  - o A table of enhanced water mixture viscosity versus temperature of water used for mixing: Viscosity shall be measured at 10 minutes, 30 minutes, 1 hour, and 24 hours following mixing;
  - o A table of enhanced water mixture viscosity at 70 degrees Fahrenheit, 1 hour and 24 hours following mixing, versus the mix ratio from 0.25 percent below the lowest concentration to 0.25 percent above the highest concentration; and
  - o A table of hardness and conductivity versus viscosity of the enhanced water mixture at 70 degrees Fahrenheit for 10 minutes, 30 minutes, 45 minutes, and 1 hour after mixing.
  - o Other data the submitter considers relevant and useful to the evaluation.
- Information regarding the residual content of potentially toxic substances remaining after the reaction process that created the ingredient: Water enhancers are unique in utilizing such “reacted” ingredients. The information is normally available to water enhancer product manufacturers from the ingredient manufacturer and can be forwarded to the Forest Service via letter or copies of documentation

**5) Form FS-5100-35, Class A Foam Formulation Disclosure Sheet**

- Product name
- Formulation identification
- Submitting company
- Date submitted
- Submitted by (name and signature)
- Title of submitter
- Recommended mix ratio range
- Formulation ingredients (including water, and using common chemical name)
- Whether the ingredient or supplier is proprietary (if proprietary, explanation is required)
- Manufacturer, process, and quality/grade

- Chemical Abstract Services (CAS) number or other technical identification (must be accepted industry standard)
- Percent by weight in wet concentrate
- Percent by weight in solution across the recommended use-level range
- Patent or Trade Mark number (and copy of the patent)
- Remarks

**6) FS-5100-36, Class A Foam Technical Data Sheet**

- Product name
- Submitting company
- Formulation identification
- Mix ratio range
- Physical properties of the concentrate (if liquid) and mixed product
- Recommended method for the laboratory preparation of the product (including equipment, techniques, and precautions), attach laboratory bulletin if needed
- Recommended methods for field mixing, handling, packaging, and proposed hardware; attach equipment bulletin if available.

**7) Form FS-5100-37, Long-Term Retardant Formulation Disclosure Sheet**

- Product name
- Formulation identification
- Submitting company
- Date submitted
- Submitted by (name and signature)
- Title of submitter
- Recommended mix ratio
- Formulation ingredients (including water, and using common chemical name)
- Whether the ingredient or supplier is proprietary (if proprietary, explanation is required)
- Manufacturer, process, and quality/grade
- Chemical Abstract Services (CAS) number or other technical identification (must be accepted industry standard)
- Percent by weight in wet or dry concentrate
- Percent by weight in solution at recommended use-level
- Patent or Trade Mark number (and copy of the patent)
- Remarks

**8) FS-5100-38, Long-Term Retardant Technical Data Sheet**

- Product name
- Submitting company
- Formulation identification
- Mix ratio
- Physical properties of the concentrate (if liquid) and mixed product
- Recommended method for the laboratory preparation of the product (including equipment, techniques, and precautions), attach laboratory bulletin if needed
- Recommended methods for field mixing, handling, packaging, and

proposed hardware; attach equipment bulletin if available.

**9) FS-5100-39, Long-Term Retardant, Hydration - Viscosity Curves, Technical Data Sheet**

- Product name
- Submitting company
- Formulation identification
- Mix ratio
- Data, graphs or tables (as indicated) for a mixture of concentrate and water at the ratio being evaluated:
  - o Mixed retardant viscosity versus time since mixing, at a temperature of 70 degrees Fahrenheit;
  - o A table of mixed retardant viscosity versus temperature of water used for mixing: Viscosity shall be measured at 10 minutes, 30 minutes, 1 hour, and 24 hours following mixing;
  - o A table of mixed retardant viscosity at 70 degrees Fahrenheit, 1 hour and 24 hours following mixing, versus the mix ratio from 0.25 percent below the lowest concentration to 0.25 percent above the highest concentration; and
  - o Other data the submitter considers relevant and useful to the evaluation.

**b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.**

Table 1 - Respondents

Information Collected	Description	Information Provided to:	Prepared by
Material Safety Data Sheet	Material Safety Data Sheet for the submitted Wildfire Chemical Product	FS, Wildland Fire Chemical Systems	Wildfire Chemical Product manufacturer (respondent)
Material Safety Data Sheets	Material Safety Data Sheets for each individual ingredient, provided by ingredient manufacturer/supplier		Individual ingredient manufacturer/supplier to the respondent; submitted to FS by the Wildfire Chemical Product manufacturer (respondent)
FS-5100-32	Water Enhancer (Gel) Formulation Disclosure Sheet		Wildfire Chemical Product manufacturer (respondent)
FS-5100-33	Water Enhancer (Gel) Technical Data Sheet		
FS-5100-34	Water Enhancer (Gel) Technical Data Sheet; Part 2		
FS-5100-35	Class A Foam Formulation Disclosure Sheet		
FS-5100-36	Class A Foam Technical Data Sheet		
FS-5100-37	Long-Term Retardant Formulation Disclosure		

	Sheet		
FS-5100-38	Long-Term Retardant Technical Data Sheet		
FS-5100-39	Long-Term Retardant Technical Data Sheet; Part 2		

**c. What will this information be used for - provide ALL uses?**

The information provided will allow the Forest Service to search and determine if any of the ingredients are on the:

- List of unacceptable ingredients as defined in US Forest Service Specification 5100-304c, section 2.2 and amendments
- List of unacceptable ingredients as defined in US Forest Service Specification 5100-306a, section 2.2 and amendments
- List of unacceptable ingredients as defined in US Forest Service Specification 5100-307a, section 2.2 and amendments
- List of Known and Suspected Carcinogens, or
- The U.S. Environmental Protection Agency’s List of Extremely Hazardous Materials

If an ingredient does occur in sufficient quantity for concern, it may trigger an additional risk analysis to determine risk to human/environmental health by typical use of the product or to Forest Service employees evaluating the product.

Should a risk analysis be necessary, the submitter may be asked to provide funding to cover any associated costs. The Forest Service may require that the risk analysis be completed prior to performing the product evaluation in order to identify risks to the people doing the evaluation.

**d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?**

Forms FS-5100-32, FS-5100-33, FS-5100-34, FS-5100-35, FS-5100-36, FS-5100-37, FS-5100-38, and FS-5100-39 are all available in either electronic form via e-mail or in hardcopy provided by the Forest Service, as the respondent prefers. All forms may be completed by hand or typewriter, or electronically. Material Safety Data Sheets are typically available in hard copy and/or electronically. Responses can be submitted by e-mail, USPS, fax, or by other standard business methods.

**e. How frequently will the information be collected?**

Information is collected for each formulation or reformulation once, upon the respondent’s initial request for evaluation. For the purposes of this information collection, it is anticipated on average five respondents will submit thirty five new responses during a twelve-month period.

**f. Will the information be shared with any other organizations inside**

**or outside USDA or the government?**

Any proprietary information submitted to the Forest Service will be kept in locked files. All available information may be shared and discussed with representative of US Fish and Wildlife Service and NOAA-Fisheries as part of Forest Service consultation with these agencies as required by the National Environmental Protection Act, Endangered Species Act, and the Notice of Decision under the Environmental Impact Statement on the use of Long-Term Retardant. Basic information on product performance and characteristics will be provided to potential users such as the Department of the Interior's wildland fire agencies, state wildland fire agencies, and international wildland fire cooperators (i.e., Canada and Australia) if the product successfully completes the evaluation.

**g. If this is an ongoing collection, how have the collection requirements changed over time?**

As the product specification has evolved, the Forest Service has reduced the amount of information collected. The Agency has identified what information is necessary to evaluate the products. In the case of potentially hazardous residual content created in development of an ingredient, the Agency asks for additional information necessary to address the potential risk to either the environment or human health.

The basic collection of specific information has not changed.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

The Forest Service forms used to collect information from respondents are available electronically. The Agency accepts electronic and hard copy submissions of required information. Nearly all respondents submit information electronically, although some pre-printed manufacturer/supplier's individual ingredient Material Safety Data Sheets are submitted in hardcopy.

The data collected is unique to each formulation and is the minimum necessary to determine potential hazardous effects. Generally, a portion of the data collected is proprietary and therefore may not be appropriate for a fully automated collection process. When several similar products are submitted at the same time, submitters may send a single copy of an individual ingredient Material Safety Data Sheet rather than one for each formulation.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The Forest Service is unaware of any other information source. The data collected is often proprietary in nature and not available through any other

source within the Agency, USDA, other government source, or outside of government. Although the MSDSs for the ingredients may be available from the respondent's supplier, to ensure the FS receives the correct MSDS for the specific ingredient it is best for the respondent to provide them.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

All potential respondents are from the private sector. Small businesses typically submit a single formulation for evaluation, while large businesses typically submit several formulations, and thus responses, at a time. Out of the 5 respondents, 2 are small businesses.

The Agency has attempted to reduce the burden for all entities by limiting the collected information to the minimum necessary for Forest Service scientists to make informed decisions on human health and environmental risk; or that necessary to correctly mix and handle the product to provide a fair evaluation.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Without this information, the Forest Service would not be able to assess the safety of wildland fire chemicals used to manage fires on Agency lands because specific ingredients and the quantity of each are not public information. This would result in the Agency failing to meet Forest Service Manual direction (FSM 5162.02) to utilize, "...fire chemical products to accomplish fire management activities **safely**, efficiently, and effectively." *[Emphasis added.]* The information provided to agency personnel allows them to determine whether formulations contain hazardous ingredients in sufficient quantity to increase the risk to human health or to natural ecosystems to unacceptable levels.

The first safety item that must be addressed by the Agency is to determine whether there are ingredients in the formulation that could be hazardous to the laboratory personnel doing the evaluation. The next concern is the use of the product in wildland fire fighting and the potential exposure to the firefighters, the public at large, and to the environment. Knowledge of specific ingredients and their respective quantity in a product allows the Forest Service to make informed decisions regarding the human health and environmental risk of these products.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **Requiring respondents to report information to the agency more often than quarterly;**

Submission information is required once for each formulation, at the time of submission. Respondents would report information more often than quarterly only if respondent wishes to change the formulation more often than quarterly. We request that the submitter notify us of revisions to the product Material Safety Data Sheet that may occur as part of the regular



information review as required by the Occupational Safety & Health Administration, but this is not required.

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

A Federal Register Notice notifying the public of the 60-day comment period for this information collection renewal was published in Volume 76 page 58462 on September 21, 2011. No public comments were received.

A subsequent Federal Register Notice notifying the public of the 30 day comment period was published. The Forest Service received one comment from Dr. Michael Payne stating that obtaining the information we required from our suppliers was, in his experience, very difficult. In our response, we briefly detailed our requirements and stated that we had very little trouble getting the information we requested as that was part of our routine evaluation process and that we did not accept products for testing until that information was received and reviewed for completeness and that there were no areas of concern based on the published requirements found in our specification.

The Forest Service continually seeks comments on specifications and includes the information collection forms in the packages sent to manufacturers that express an interest in submitting a product for evaluation. Notices are placed in FedBizOps every other year requesting additional products and at least every three years requesting comments to assist the Agency to improve the specifications. All comments are reviewed by representatives of the Forest Service and other Federal and state wildland firefighting agencies. The Forest Service consults individually with company representatives who wish to comment on the requirements of the specification or submission procedures, submit a product for evaluation, to obtain clarification of the information requested.

The following businesses (and their listed representatives) have responded to this information collection and were contacted in that regard. Their comments have been collected, as described in the paragraph above and during one-on-one discussion.

- ICL Performance Products, L.P.  
Edward Goldberg  
428 Buttonwood Road  
Landenburg, PA 19350  
215-280-3864
- Gel Tech Solutions, Inc.  
Rob Rosovich  
1460 Park Lane S. Suite 1  
Jupiter, FL 33458  
800-924-4874
- Thermo-Gel  
Jay Simmons  
400 E. Broadway, Suite 50  
Bismark, ND 58501  
701-258-8208
- Ansul/Tyco  
Ms. Alison Gude  
One Stanton Street  
Marinette, WI 54143  
715-732-3635
- Chemguard, Inc.  
Randy Hendrickson  
204 S. 6<sup>th</sup> Avenue  
Mansfield, TX 76063  
817-473-9964
- X'AAN Innovations, Inc.  
Andy Garner  
3717 Devonshire Drive  
Surrey, BC V3S 0H8  
604-264-8573



**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

The information required from the respondents does not include any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other personal matters commonly considered private.

**12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form.**

- a) Description of the collection activity**
- b) Corresponding form number (if applicable)**
- c) Number of respondents**
- d) Number of responses annually per respondent,**
- e) Total annual responses (columns c x d)**
- f) Estimated hours per response**
- g) Total annual burden hours (columns e x f)**

Table 2 – Estimated Burden Hours

<b>(a) Description of the Collection Activity</b>	<b>(b) Form Number</b>	<b>(c) Number of Responden ts</b>	<b>(d) Number of responses annually per Responden t</b>	<b>(e) Total annual respons es (c x d)</b>	<b>(f) Estimate of Burden Hours per respons e</b>	<b>(g) Total Annu al Burde n Hours (e x f)</b>
Water Enhancer (Gel) Formulation Disclosure Sheet	FS-5100-32	2	1	2	1.0	2.0
Water Enhancer (Gel) Mixing & Handling Requirements	FS-5100-33		1	2	1.5	3.0
Water Enhancer (Gel) Viscosity-Hydration Curves & Viscosity-Water Quality Curves	FS-5100-34		1	2	2.0	4.0
MSDSs for Water Enhancer (Gel) & each ingredient (provided by ingredient manufacturer)	N/A		1	2	1.0	2.0

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(a) Description of the Collection Activity	(b) Form Number	(c) Number of Responden ts	(d) Number of responses annually per Responden t	(e) Total annual respons es (c x d)	(f) Estimate of Burden Hours per respons e	(g) Total Annua l Burde n Hours (e x f)
Totals for Gels	---	<b>2</b>	---	<b>8</b>	---	<b>11</b>
<b>Merging of 0596-0183</b>						
Class A Foam Formulation Disclosure Sheet	FS-5100-35	1	1	1	1.0	1.0
Class A Foam Mixing & Handling Requirements	FS-5100-36		1	1	1.5	1.5
MSDSs for Class A Foam & each ingredient (provided by ingredient manufacturer)	N/A		1	1	1.0	1.0
Totals for Class A Foams	---	<b>1</b>	---	<b>3</b>	---	<b>3.5</b>
<b>Merging of 0596-0184</b>						
Long-term Retardant Formulation Disclosure Sheet	FS-5100-37	2	3	6	0.75	4.5
Long-Term Retardant - Mixing and Handling Requirements Technical Data Sheet	FS-5100-38		3	6	1.0	6
Long-term Retardant, Hydration - Viscosity Curves, Technical Data Sheet	FS-5100-39		3	6	1.75	10.5
MSDSs for Long-Term Retardant & each ingredient (provided by ingredient manufacturer)	N/A		3	6	0.5	3
Totals for Long-Term Retardants	---	<b>2</b>	---	<b>24</b>	---	<b>24</b>
<b>Totals For all Products</b>			<b>35</b>			<b>38.5</b>

- **Record keeping burden should be addressed separately and should include columns for:**
  - a) Description of record keeping activity:**
  - b) Number of record keepers:**
  - c) Annual hours per record keeper:**
  - d) Total annual record keeping hours (columns b x c):**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Table 3 – Estimated Annual Cost to Respondents

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(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c) Estimated Average Income per Hour	(d) Estimated Cost to Respondents
FS-5100-32	2	\$ 38.50	\$ 77.00
FS-5100-33	3	\$ 38.50	\$ 115.50
FS-5100-34	4	\$ 38.50	\$ 154.00
Copies of MSDSs for Water Enhancer (Gel) & ingredients	2	\$ 18.06	\$ 36.12
Sub Total for Gels	11	---	\$ 382.62
FS-5100-35	1	\$38.50	\$ 38.50
FS-5100-36	1.5	\$38.50	\$ 57.75
Copies of MSDSs for Class A Foam & ingredients	1	\$18.06	\$ 18.06
Sub Total for Class A Foam	3.5	---	\$114.31
FS-5100-37	4.5	\$38.50	\$ 173.25
FS-5100-38	6	\$38.50	\$ 231.00
FS-5100-39	10.5	\$38.50	\$ 404.25
Copies of MSDSs for Long-Term Retardant & each ingredient	3	\$18.06	\$ 54.18
Sub Total for Long-Term Retardants	24	---	\$ 862.68
Combined Total for All Product Types	38.5	---	\$1,359.61

The estimate of \$38.50/hr to accomplish the collection activity for the forms assumes a chemist is performing these duties, based upon a review of their development work. The salary was determined by asking a respondent if an annualized salary of approximately \$80,000 was appropriate for the individuals preparing the collection forms. The response was that this was a correct approximation, considering the cost to the company per year (including benefit package). The average daily cost was calculated by dividing the annual salary of \$80,000 by 261 workdays per year<sup>1</sup>. The daily cost was divided by 8 (number of hours in an average workday) to determine an hourly cost (increased to the nearest half dollar for estimation purposes).

To determine the estimated average income for a clerical employee to collect the Material Safety Data Sheets from individual ingredient manufacturers, the proponents of this information collection accessed the "INFORMATION CATEGORY" found on page 4 of "Bureau of Labor News Release" to obtain estimated average income per hour for a manufacturing employee based upon the May 2010 value, \$18.06 (<http://www.bls.gov/oes>).

**13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital**

<sup>1</sup> Average number of workdays in a calendar year

**and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

There are no capital operation and maintenance costs.

**14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

**The response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:**

- Employee labor and materials for developing, printing, storing forms**
- Employee labor and materials for developing computer systems, screens, or reports to support the collection**
- Employee travel costs**
- Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information**
- Employee labor and materials for collecting the information**
- Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information**

Table 4: Estimated Annual Cost to the Government

<b>ACTION ITEM</b>	<b>PERSONNEL</b>	<b>GS LEVEL</b>	<b>HOURLY RATE*</b>	<b>HOURS</b>	<b>SALARY</b>
Employee labor and materials for collecting information	Physical Scientist	GS-11/5	\$38.47	11	\$ 423.17
Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information	Chemist	GS-12/9	\$54.29	11	\$ 597.19
Total annual cost					\$1,020.36

\* Taken from: <http://www.opm.gov/oca/11tables/index.asp>, Cost to Government calculated at hourly wage multiplied by 1.3

**15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-I.**

By combining approved Information Collections 0596-0183, & 0596-0184 into the renewal of 0596-0182, the total number of responses has decreased from 76 to 19, and total burden hours decreased from a total 86 hours to 38.5. Estimates were changed based on discussions with respondents regarding their future plans for reformulation of their products. This renewal requests approval for a combined total of 35 responses and 39 burden hours.

**16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

There are no plans for the Forest Service to publish the results of this information collection activity.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The Forest Service requests approval to omit the expiration date for OMB approval from the forms associated with this information collection. The forms are used rarely, are not expected to change, and are usually collected one time only for each formulation. An expiration date may cause respondents confusion, as they may interpret this as an expiration date for the information provided, which is not the case.

**18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."**

The Forest Service is able to certify compliance with all provisions under item 19.

## **B. Collections of Information Employing Statistical Methods**

This information collection does not employ statistical methods.