

**Supporting Statement for a Request for OMB Review under  
The Paperwork Reduction Act**

**1 IDENTIFICATION OF THE INFORMATION COLLECTION**

**1(a) Title of the Information Collection:**

**EPA's Design for the Environment (DfE) Partner of the Year Awards Program**

**ICR Numbers: EPA ICR No. 2450.01 OMB Control No.: 2070-NEW**

**1(b) Short Characterization / Abstract**

This new information collection request (ICR) addresses the submission of applications to EPA for recognition under the Partner of the Year (PY) Awards Program.

EPA developed The PY Awards to recognize DfE stakeholders who have furthered DfE's safer chemistry goals through their active and exemplary participation in and promotion of the Program. Making DfE's mission known to the widest possible audience, through its safer product label and in other forms of communication, is critical to fully realizing the program's goals of protecting human health and the environment, promoting a sustainable economy, and creating green jobs, especially in the small business sector.

The PY Awards will be an annual event, with recognition for DfE stakeholder organizations from five broad categories: (1) Formulators/Product Manufacturers (of both consumer and Institutional/Industrial (I/I) products), (2) Purchasers and Distributors, (3) Retailers, (4) Supporters (e.g., non-governmental organizations, including environmental and health advocates, trade associations, academia, sports teams, and others), and (5) Innovators (e.g., chemical manufacturers, technology developers, and others). Within these categories and based on the criteria, DfE may elect to give an additional award in the subcategories of "small business" and "sustained excellence."

Candidates will complete an application that describes the actions taken to qualify for recognition and have it signed by a company or organization authority (e.g., CEO, vice president for governmental affairs, division head, or other authorized signatory).

**2. NEED FOR AND USE OF THE COLLECTION**

**2(a) Need/Authority for the Collection**

Authority for PY 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 PY in recognition of these directives and through consultation with a broad range of stakeholders.

The information collection activities for PY will assist the Agency in meeting the goals of the PPA by providing recognition for organizations committed to promoting and using safer chemicals. In turn, PY will help organizations meet their sustainability goals by providing the means to, and an objective measure of, environmental stewardship. Investment analysts and advisers often seek these types of measures in evaluating a corporation's sustainability profile and investment worthiness.<sup>1</sup> PY is also an incentive for promoting the greater use of safer chemicals by organizations EPA has carefully tailored its request for information, especially the PY Application Form, to ensure that it only asks for information essential to verifying an applicant's eligibility for award or recognition.

## **2(b) Practical Utility/Users of the Data**

The information collected by the PY Awards Program is not designed or intended to support regulatory decision-making by EPA. EPA uses the information collected in the PY Application Form to: (1) identify the candidate's commitment to promoting and using safer chemicals; (2) verify the candidate's involvement in promoting and using safer chemicals; and (3) determine the candidate's eligibility for PY award or recognition.

## **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 PY Awards Program is unique and is not duplicative of previous information collection requests. EPA also checked with potential respondents (e.g., trade associations) to confirm that the information being collected by the PY Awards 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 March 13, 2012 (77 FR 2058, January 13, 2012). EPA received no comments during the comment period.

### **3(c) Consultations**

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 three parties via e-mail. The individuals contacted were:

Bill Balek, Director  
Environmental Services  
ISSA -- The Worldwide Cleaning Industry Association  
Lincolnwood, IL 60712  
[bill@issa.com](mailto:bill@issa.com)

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<sup>1</sup>"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

Beth Law  
Assistant General Counsel and Vice President of International Affairs  
Consumer Specialty Products Association (CSPA)  
Washington, DC 20006  
[blaw@cspa.org](mailto:blaw@cspa.org)

Kathleen Stanton, Director  
Technical and Regulatory Affairs  
The American Cleaning Institute  
Washington, DC 20005  
[KStanton@cleaninginstitute.org](mailto:KStanton@cleaninginstitute.org)

EPA received one supportive response to its solicitation for consultations, from Ms. Beth Law, Consumer Specialty Products Association. Copies of EPA's consultation e-mail to the above potential respondents, and of the response that EPA received, are included in Attachment C.

### **3(d) Effects of Less Frequent Collection**

The PY Application Form is designed to be an annual information submission for organizations that wish to apply for recognition. Without this information, EPA will not be able to effectively determine and formally recognize the extent to which organizations are engaged in activities to promote the use of DfE-labeled products and actions to advance the program.

### **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**

No information collected by EPA under PY comprises confidential business information as defined by EPA's confidentiality regulations (40 CFR 2.201 et seq.).

### **3(g) Sensitive Questions**

The information collection activities discussed in this document do not involve any sensitive questions involving sexuality, religious beliefs, political affiliation, or other matters considered private, as described in the document "The Paperwork Reduction Act of 1995: Implementing Guidance for OMB Review of Agency Information Collection," from June 2, 1999.

## **4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

### **4(a) Respondents and NAICS Codes**

Under the PY awards program, EPA seeks applicants from establishments engaged in the production, use, and/or advancement of safer chemicals and who have furthered the goals of DfE through their active and exemplary participation in and promotion of the program.

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 for PY awards. However, EPA expects that most applications will come from the following industries:

<u>NAICS Code</u>	<u>Affected Industry</u>
325510	Paint and Coating Manufacturing
325611	Soap and Other Detergent Manufacturing
325612	Polish and Other Sanitation Good Manufacturing
325910	Printing Ink Manufacturing
325992	Photographic Film, Paper, Plate, and Chemical Manufacturing
325998	All Other Miscellaneous Chemical Product and Preparation Manufacturing
561210	Facilities Support Services
561720	Janitorial Services
561740	Carpet and Upholstery Cleaning Services
611310	Colleges, Universities, and Professional Schools
8123	Drycleaning and Laundry Services
921190	Other General Government Support

#### **4(b) Information Requested**

Once a prospective organization reviews the PY materials and decides to apply, it should submit a PY Application Form (see Attachment B for complete form). All forms will be available in hard copy and electronic format. Participants can use the hard copy forms they receive from EPA by mail or download PDF versions of the forms from the DfE website at [www.epa.gov/dfe](http://www.epa.gov/dfe).

##### (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;
- Recognition category (or categories) for which the candidate is applying;
- Descriptions of activities taken to qualify for recognition;
- Signature, name, and title of senior company or organization authority (e.g., CEO, vice president for governmental affairs, division head, or other authorized signatory).

##### a. Respondent activities:

Candidates will conduct the following activities in order to complete and submit the PY Application Form:

- Review the PY information;
- Decide whether to apply for recognition, and in what recognition category or categories;
- Select a primary contact person for the program;

- Complete the PY Application Form, including obtaining the signature of a company or organization authority (e.g., CEO, vice president for governmental affairs, division head, or other authorized signatory);
- Describe how their organization meets the evaluation criteria for the relevant recognition;
- Fax, e-mail, or mail the form to EPA;
- Provide relevant documentation to EPA upon request.

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

**5(a) Agency Activities**

EPA engages in the following activities related to the PY Application Form:

- Distribute the PY Application Form to potential participants, and maintain a downloadable PDF version on the DfE website;
- Answer questions posed by potential applicants regarding PY recognition;
- Receive the completed forms, review for completeness and place any necessary follow-up calls;
- Screen applicants to determine their history of civil or criminal EPA enforcement actions; and
- Approve candidates for PY recognition based on evaluation criteria (see Attachment B, Section 2) and notify both successful and unsuccessful applicants of the decisions.

**5(b) Collection Methodology and Management**

Respondents will be able to obtain the PY Application Form in hard copy from EPA or by downloading it from the DfE website. The completed forms can be faxed, e-mailed, or 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 relevant documentation at any time to confirm that candidates have achieved the criteria for recognition. Based on its experience with the Safer Detergents Stewardship Initiative (SDSI) Awards Program, EPA anticipates needing to exercise this right for no more than one candidate per participant category and has incorporated the associated burden into section 6 below.

**5(c) Small Entity Flexibility**

EPA expects that a small number of participants in the PY Awards 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 an application for this annual awards program each of the three years covered by this ICR.

## **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

The data collection mechanism for the PY awards is the PY Application Form. In an effort to minimize burden and cost, the PY Application Form was designed to contain straightforward questions. In addition, one application package will serve all types of participants. The expected participant categories for PY are as follows:

- (1) Formulators/Product Manufacturers (of both consumer and Institutional/Industrial (I/I) products),
- (2) Purchasers and Distributors,
- (3) Retailers,
- (4) Supporters (e.g., non-governmental organizations, including environmental and health advocates, trade associations, academia, sports teams, and others) and
- (5) Innovators (e.g., chemical manufacturers, technology developers, and others).

Within these participant categories, it is expected that participants will be private sector institutions. Within the participant category Purchasers and Distributors, about five local or state governments are likely to participate, with the remaining participants being private sector institutions.

### **6(a) Estimating Respondent Burden**

The average respondent burden is estimated to be 15 hours for all participant types. EPA used professional judgment to arrive at a burden estimate, as well as its experience with administering the Safer Detergents Stewardship Initiative (SDSI). Burden hours for the PY application package are for reporting purposes only.

EPA expects that for a typical entity, program and application review will take about one hour (technical staff). Obtaining approval, which is likely to involve verifying assumptions with staff and ensuring support from multiple levels of management, will take about three hours (1 managerial, 1 technical, 1 clerical). Completing the application form will take about 11 hours (10 technical, 1 clerical). Included in the application form estimate of 11 hours is the potential applicant burden that would be incurred if EPA finds it necessary to verify the accuracy and/or completeness of information in an application. For purposes of the burden estimate, EPA assumes that it will need to verify information from one organization in each participant category.

### **6(b) Estimating Respondent Costs**

EPA estimates an average loaded hourly labor rate (base hourly rate plus fringe and overhead) of \$58.22 for managerial staff, \$55.43 for technical staff, and \$26.03 for clerical staff. These three labor rate estimates are based upon manufacturing industry wage data from *Employer Costs for Employee Compensation Supplementary Tables December 2010 (Supplementary Table 2)*. In addition, the hourly labor rates have been rounded, to the nearest cent, for the purposes of this ICR. The derivation of labor rates for managerial, technical, and clerical staff are shown in Exhibit 6.1.

**Exhibit 6.1. Derivation of Total Compensation**

	Total compensation	Wages and Salaries	Benefit costs					
			Total	Paid leave	Supplemental pay	Insurance	Retirement and Savings	Legally Required Benefits
<b>Managerial</b>	\$58.22	\$39.27	\$18.95	\$5.40	\$2.03	\$4.47	\$3.14	\$3.91
<b>Technical</b>	\$55.43	\$36.93	\$18.50	\$5.10	\$2.00	\$4.42	\$3.22	\$3.77
<b>Clerical</b>	\$26.03	\$17.36	\$8.67	\$1.90	\$0.68	\$3.16	\$0.87	\$2.06

Exhibit 6.2 presents the estimated burden hours and costs for all respondents during each of the three years covered under this ICR assuming 15 hours for all participant categories. No capital or operations and management costs are incurred by respondents under this ICR, with the possible exception of postage and photocopy costs.

**Exhibit 6.2. Estimated Annual Burden and Costs to Respondents**

Type of Affected Public	Collection activity	Estimated # of applicants	Estimated response time (hours)			Total burden (hours)				Hourly labor cost*			Total cost
			Mgr.	Tech.	Cler.	Mgr.	Tech.	Cler.	Total	Mgr.	Tech.	Cler.	
Private Sector	<b>Formulators/Product Manufacturers</b>	<b>50</b>											
	Review application and program information		0	1	0	0	50	0	50	58.22	55.43	26.03	\$2,772
	Obtain senior approval		1	1	1	50	50	50	150	58.22	55.43	26.03	\$6,984
	Complete and submit package		0	10	1	0	500	50	550	58.22	55.43	26.03	\$29,017
	<b>Subtotal</b>	<b>50</b>	<b>1</b>	<b>12</b>	<b>2</b>	<b>50</b>	<b>600</b>	<b>100</b>	<b>750</b>	--	--	--	<b>\$38,772</b>
	<b>Innovators</b>	<b>20</b>											
	Review application and program information		0	1	0	0	20	0	20	58.22	55.43	26.03	\$1,109
	Obtain senior approval		1	1	1	20	20	20	60	58.22	55.43	26.03	\$2,794
	Complete and submit package <sup>1</sup>		0	10	1	0	200	20	220	58.22	55.43	26.03	\$11,607
	<b>Subtotal</b>	<b>20</b>	<b>1</b>	<b>12</b>	<b>2</b>	<b>20</b>	<b>240</b>	<b>40</b>	<b>300</b>	--	--	--	<b>\$15,509</b>
	<b>Retailers</b>	<b>10</b>											
	Review application and program information		0	1	0	0	10	0	10	58.22	55.43	26.03	\$554
	Obtain senior approval		1	1	1	10	10	10	30	58.22	55.43	26.03	\$1,397
	Complete and submit package		0	10	1	0	100	10	110	58.22	55.43	26.03	\$5,803
	<b>Subtotal</b>	<b>10</b>	<b>1</b>	<b>12</b>	<b>2</b>	<b>10</b>	<b>120</b>	<b>20</b>	<b>150</b>	--	--	--	<b>\$7,754</b>
	<b>Supporters</b>	<b>20</b>											
	Review application and program information		0	1	0	0	20	0	20	58.22	55.43	26.03	\$1,109
	Obtain senior approval		1	1	1	20	20	20	60	58.22	55.43	26.03	\$2,794
Complete and submit package		0	10	1	0	200	20	220	58.22	55.43	26.03	\$11,607	
<b>Subtotal</b>	<b>20</b>	<b>1</b>	<b>12</b>	<b>2</b>	<b>20</b>	<b>240</b>	<b>40</b>	<b>300</b>	--	--	--	<b>\$15,509</b>	
Private Sector and Local/State Governments	<b>Purchasers and Distributors</b>	<b>10</b>											
	Review application and program information		0	1	0	0	10	0	10	58.22	55.43	26.03	\$554
	Obtain senior approval		1	1	1	10	10	10	30	58.22	55.43	26.03	\$1,397
	Complete and submit package		0	10	1	0	100	10	110	58.22	55.43	26.03	\$5,803
	<b>Subtotal</b>	<b>10</b>	<b>1</b>	<b>12</b>	<b>2</b>	<b>10</b>	<b>120</b>	<b>20</b>	<b>150</b>	--	--	--	<b>\$7,754</b>
<b>Total</b>	<b>110</b>							<b>1650</b>				<b>\$69,790</b>	



### 6(c) Estimating Agency Burden and Costs

Exhibit 6.3 presents the total compensation for Agency employees, and Exhibit 6.4 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 SDSI and other voluntary programs.

Agency labor costs are calculated based on hourly basic rates for federal employees in the Washington-Baltimore area published by the Office of Personnel Management for 2011, frozen at January 2010 levels. The average hourly labor rate for managerial staff is estimated as the rate for a GS-13 Step 5 employee, for technical staff as a GS-10 Step 10 employee, and for clerical staff as GS-5 Step 1. These GS-level assumptions are consistent with those used in past EPA OPPT ICRs. The hourly rates were multiplied by an assumed loading factor of 1.6 to reflect Federal fringe benefits and overhead. This loading factor is from an EPA guide, Instructions for Preparing Information Collection Requests (ICRs) (OPPE, 1992, page 30, footnote 9).

#### Exhibit 6.3. Total compensation for Agency Employees

Agency Employee Function	2011 pay grade	Hourly rate
Managerial	GS-13 Step 5	\$48.35
Technical	GS-10 Step 10	\$35.32

Taken from [http://www.opm.gov/oaca/11tables/pdf/dcb\\_h.pdf](http://www.opm.gov/oaca/11tables/pdf/dcb_h.pdf)

#### Exhibit 6.4. Estimated Annual Agency Burden and Costs

Activities	Hours per Labor Category		Labor Cost per Hour		Total Cost per Activity		Total Hours and Cost	
	EPA managerial	EPA technical	EPA managerial	EPA technical	EPA managerial	EPA technical	Total Hours per Activity	Total Cost per Activity
Distribute forms	7	23	\$48.35	\$35.52	\$338	\$817	30	\$1,155
Answer questions	7	23	\$48.35	\$35.52	\$338	\$817	30	\$1,155
Record / enter forms	10	30	\$48.35	\$35.52	\$484	\$1,066	40	\$1,549
Verify information; Make awards selection	12	38	48.35	35.52	\$580	\$1,350	50	\$1,930
Notify applicants of decision	3	9	48.35	35.52	\$145	\$320	12	\$561

**6(d) Estimating the Respondent Universe and Total Burden and Costs**

EPA estimates that 110 applications will be submitted each year over the three-year life of the clearance. Furthermore, due to the nature of the PY awards and the demographic of interested parties, EPA estimates that about nearly half of participating companies will be product formulators/manufacturers. The total annual burden hours and cost associated with this information collection are 1,650 hours and \$69,790, respectively.

**6(e) Bottom Line Burden Hours and Cost Tables**

a. Respondent Tally

Exhibit 6.5 below summarizes the total annual estimated respondent burden and cost. These estimates represent the average burden in any given year over the three years covered by this ICR.

**Exhibit 6.5. Total Annual Estimated Respondent Burden and Cost Summary**

<b>Total # of Respondents</b>	<b>Average Burden Hours</b>	<b>Capital and O&amp;M Cost</b>	<b>Annual Labor Cost</b>
110	1,650	\$0	\$69,790

b. Agency Tally

Exhibit 6.6 below summarizes the total annual estimated agency burden and cost. These estimates represent the average burden in any given year over the three years covered by this ICR.

**Exhibit 6.6. Total Annual Estimated Agency Burden and Cost Summary**

<b>Burden Hours</b>	<b>Annual Labor Cost</b>
162	\$6,350

**6(f) Reasons for Change in Burden**

Since this is a new ICR, change in respondent burden is not applicable.

**6(g) Burden Statement**

The annual public burden for this collection of information is estimated at 15 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, 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 information collection appears above. 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-2011-0858. 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 through the Federal Docket Management System (FDMS) at [www.regulations.gov](http://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 No. EPA-HQ-OPPT-2011-0858 and OMB control number 2070-NEW 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 ID No. EPA-HQ-OPPT-2011-0858. These attachments are available for online viewing at [www.regulations.gov](http://www.regulations.gov) or otherwise accessed as described in section 6(g) of the supporting statement.

- Attachment A:**        **42 USC 13103 - Pollution Prevention Act Section 6604.** An authenticated electronic version is available online at the Government Printing Office's Federal Digital System (FDsys) website.
- Attachment B:**        **Design for the Environment Safer Product Labeling Program Partner of the Year Application Form**
- Attachment C:**        **Copy of Consultations Message Sent by EPA to Potential Respondents and Copy of Response**