

**SUPPORTING STATEMENT FOR
AN INFORMATION COLLECTION REQUEST (ICR)**

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

Pesticide Environmental Stewardship Program Annual Measures Reporting

EPA ICR No.: 2415.01

OMB Control No.: 2070-NEW

1(b) Short Characterization

This new information collection request (ICR) enables EPA to run the Pesticide Environmental Stewardship Program (PESP)¹. The program uses the information collected to establish partner membership, develop stewardship strategies, measure progress towards stewardship goals, and award incentives. PESP is an EPA voluntary program implemented by the Office of Pesticide Programs (OPP). Its goal is to promote environmental stewardship to protect human health and the environment. PESP encourages the use of integrated pest management (IPM) strategies to reduce pests and pesticide risks through partnerships with entities among the pesticide user community. IPM is an approach that involves making the best choices from among a series of pest management practices. It allows for economical pest management, and does so with the least possible hazard to people, property, and the environment.

PESP was established in 1994 with six member organizations and has grown to 314. While most PESP members are entities that are pesticide end-users, several others are organizations which focus on training, educating, or influencing pesticide users. To become a PESP member, a pesticide user entity or an organization submits an application and a five-year strategy. The strategy outlines how environmental and human health risk reduction goals will be achieved through the implementation of IPM, or through educating others on IPM. The program encourages PESP members to track progress towards IPM goals: reduced use of unnecessary pesticides, cost reductions, and knowledge shared about IPM methodologies. Entities in the PESP program benefit through technical assistance, and through incentives for achievements at different levels.

PESP provides incentives for advancing IPM and pesticide risk reduction through awards programs and public recognition. EPA recognized the performance of outstanding members by rewarding *PESP Champions*.² This award, first given in 2002, distinguished members by publicizing their outstanding efforts for promoting IPM, reducing pesticide risk, and for their extraordinary level of commitment to the PESP mission and objectives. In 2011, the *PestWise Awards* program broadened the existing *PESP Champion Award* program to foster collaborative

¹ The Pesticide Environmental Stewardship Program website can be found at <http://www.epa.gov/pestp/>

² PESP Champions Awards, *PESP Handbook* (2011, p. 6): <http://www.epa.gov/pestwise/pestp/documents/pestp-handbook.pdf>

innovations that highlight IPM solutions to pest management problems.³ As of November, 2012, the *PestWise* program has not started conferring awards.

The incentive structure of PESP is dependent upon members' submission to EPA of IPM use information and reports on the resulting environmental outcomes. For example, members may qualify to advance to one of three membership tiers (bronze, silver, and gold) based on sustained reduction of pesticide risks and an independent measure of IPM implementation.⁴ The data needed to quality is collected through the annual PESP reports. In addition, annual progress reports (also referred to as 'surveys' in the PESP program) enable EPA and PESP members to track measure the progress being made in adopting IPM activities and reductions in risks to human health and the environmental. Attachment A is a flow chart that demonstrates the PESP membership level advancement process.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

Section 2(b) of the Pollution Prevention Act of 1990, 42 U.S.C. 13101(b), sets forth "the national policy of the United States that pollution should be prevented or reduced at the source whenever feasible." Section 3 defines source reduction as any practice that "reduces the amount of any hazardous substance ... released into the environment" and "reduces the hazards to public health and the environment associated with the release of such substances." To implement this policy, Section 4(b) of the Act directs the Administrator of EPA to, among other things, "facilitate the adoption of source reduction techniques by business" (see Attachment B).

Section 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) requires EPA to regulate pesticides to prevent "unreasonable adverse effects" on human health and the environment (Attachment C). IPM strategies such as decreasing pesticide use and targeted pesticide treatment reduce the likelihood of pesticides causing unreasonable adverse effects. The Food Quality Protection Act (FQPA) of 1996 (7 USC 136r-1) requires the U.S. Department of Agriculture and EPA to implement programs in research, demonstration, and education to support the adoption of IPM, make information on IPM widely available to pesticide users, use IPM techniques in carrying out pest management activities, as well as promote IPM through procurement, regulatory policies and other activities (Attachment D). PESP is EPA's non-regulatory approach to meeting the goals of the Pollution Prevention Act, FIFRA and FQPA to reduce pesticide use and risks in agricultural and non-agricultural settings.

The collection of information which documents and measures member accomplishments enables EPA to fairly and accurately assess program effectiveness and award benefits. Completed PESP applications, including contact information, are preliminary to EPA's formal acceptance of members. Annual progress reports allow EPA to understand and assist each member's efforts. In addition, such reports track and measure individual and overall program

³ *PestWise Awards* program information: <http://www.epa.gov/pestwise/awards/index.html>

⁴ The PESP Member Directory website details how members can receive recognition for their achievements by qualifying for Bronze, Silver, and Gold tiers: <http://www.epa.gov/pestwise/peps/members/>

progress in adopting IPM, and the resulting reductions in risks to human health and environmental.

2(b) Practical Utility/Users of the Data

The information collected by PESP is not designed or intended to support EPA regulatory decision-making. EPA intends to use the information collected in the PESP Membership Application and the Strategy/Reporting Form to:

- (1) Identify the member's commitment to promoting and implementing IPM practices;
- (2) Verify the member's involvement in promoting and implementing IPM practices;
- (3) Measure environmental outcomes resulting from the member's activities toward promotion and implementation of IPM, and
- (4) Determine the member's eligibility for award or recognition under PESP.

In addition, to the extent possible, EPA will analyze the data to look for environmental trends and highlight program successes by posting information on the PESP website (<http://www.epa.gov/pestwise/pestwise>).

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 PESP is unique and is not duplicative of previous ICRs. EPA consulted with trade associations and potential partners to confirm that the information being collected by the PESP does not exist elsewhere.

3(b) Public Notice Required Prior to ICR Submission to OMB

Pursuant to 5 CFR 1320.8(d), EPA published a Federal Register notice (75 FR 66084, October 27, 2010) announcing this proposed information collection activity and provided a 60-day public comment period. Ten comments were submitted on this proposal. Public comments for this action and stakeholder comments other comments received regarding this ICR have been posted in the docket at <http://www.regulations.gov> and may be accessed using the docket identifier EPA-HQ-OPP-2010-0793. EPA's response to the comments document addresses the comments received during the public comment period (ATTACHMENT E).

3(c) Consultations

Stakeholder Meetings

During the development of this ICR, the Agency consulted with PESP members and stakeholders who actively interact with the Agency through PESP. EPA engaged in a stakeholder

consultation process during the PESP National Conference in November 2009.⁵ Following the presentation of a proposed list of performance measures to members in attendance, EPA facilitated an extensive, one-and-a-half day dialogue. In January and February of 2010, EPA conducted a pilot exercise to assess the burden on members of submitting annual PESP progress reports. During this pilot, EPA asked 10 PESP members to submit an annual progress report. The results from this pilot exercise have informed the burden estimates of this information collection as reported in Section 6 of this document.

Notice and Comments

Following the publication of the first Federal Register Notice for this ICR, eight PESP member organizations submitted comments. Four of the comments received were in support of the proposed information collection activities. National Pest Management Association and Audubon International provided comments to the public docket in support of the measures proposed in the ICR. One commenter, Fischer Environmental Services, stated that the actual burden should be much lower than shown in the proposed ICR because the information required in the reporting form is already tracked in the pest control industry, and would require no extra work to submit over 95% of the requested data.

Three commenters expressed some concern over the specificity and the nature of the measurement data, asking for more flexibility to submit approximate figures and alternative measurement data. EPA revised some of the measures to allow for more flexibility in options as a result of such comments. The Agency's responses to public comments are included in the docket as well as in ATTACHMENT E of this final ICR.

Consultation Responses

In July and August of 2012, EPA consulted with representative members from each of the three membership categories: IPM users, National IPM users, and IPM promoters. Three PESP members were provided feedback on the burden estimates associated with this ICR as well as comment on the reporting requirements and processes. The questions asked and responses have been posted in the docket and as ATTACHMENT F of the final ICR.

List of Representatives Consulted

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⁵ PESP National Conference Report (2009): <http://www.epa.gov/pestwise/publications/pesp/2009-conference-report.pdf>

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Two of the entities consulted, Audubon International and National Pest Management Association, agreed with the burden and cost estimates in this ICR for preparing and submitting the information required. A third respondent, Terminix International, stated that the labor rates are low, and that capital costs that may be incurred for software development and implementation to provide required data in annual surveys need to be included.

Terminix specified two questions about the Strategy-Progress Reporting Form for Commercial-Residential Pest Control Services (see Section 4(b) of this ICR for a description of the form, ATTACHMENT I) for which they cannot currently produce data in their system to able to respond. These questions seek information on risk reduction in terms of total amount of pesticide applied (or purchased, if amount applied is not available), and on organizational profile measures in terms of the total number of non-chemical treatments in the reporting period.

Terminix' estimate for adding data fields in their system to respond to these two questions is between \$10,000 and \$15,000. Even if those two data items were not required, Terminix estimates that it would cost them between \$1,000 and \$1,500 to completely answer all of the questions in the Strategy-Reporting form because they do not currently collect the data required. EPA has included the initial cost of the first year's strategy and data collection setup in its estimates. This cost is reflected in Section 6 of this ICR in the burden and cost estimates, in Tables 1-3, within the line item "Plan, prepare, and setup for annual PESP surveys." This cost is \$2,130 for IPM Promoters, \$5,788 for IPM Users, and \$18,347 for National IPM Users. To clarify that such a cost has been included, the Agency has changed the description of this line item from "Prepare and submit annual PESP progress report," which is how it appears in the proposed ICR.

In response to Terminix' comment regarding the organization profile measures asking for the number of non-chemical treatments, the PESP program is considering alternatives, including offering the non-chemical treatment measures field as an optional one. PESP recognizes that defining and separately tracking the wide range of treatments that might fall under the non-chemical treatments category may be difficult for some entities, and is looking for strategies that can provide measurable results in this area.

Other Comments

Outside of public comments and consultations, over the course of preparing this ICR, EPA has received multiple verbal comments during conferences and consultations that suggest ways to improve the data collection method and to make some of the data measures less burdensome. Central Coast Vineyard Team, a PESP member, communicated to EPA staff its support for the reporting of measures requested in this ICR and its recognition of the benefit of documenting IPM implementation in agriculture. Again, as a result of these comments, EPA changed the proposed performance measures to align with several of the PESP member's suggestions.

3(d) Effects of Less Frequent Collection

EPA requests that PESP members submit a progress report on certain environmental performance measures on an annual basis. The one year timeframe will enable EPA to develop a good understanding of each member's progress over time. Asking members to report less frequently would pose a greater burden on them, as members would then have to track their pesticide usage and other data over a longer period of time and, subsequently, provide a larger overall report to EPA. It would also delay recognition of members' accomplishments, potentially depriving them of significant benefits of participation in PESP.

3(e) General Guidelines

The information collection activities discussed in this ICR comply with all regulatory guidelines under 5 CFR 1320.5(d)(2). PESP members will not need to retain records for this program for more than one year. PESP progress reports will be submitted annually.

3(f) Confidentiality

EPA has implemented procedures to protect any confidential, trade secret or proprietary information from disclosure that provide strict instructions regarding access to and contact with documents confidential business information (CBI). These procedures comply with EPA's CBI regulations at 40 CFR Part 2, Subpart B.

3(g) Sensitive Questions

This information collection activity complies with the provisions of the Privacy Act of 1974 and OMB Circular A-108. No information of a sensitive or private nature is requested in conjunction with this information collection activity. EPA aggregates data before sharing it with any party outside of the Agency. PESP data sharing activities protect an organization's data by presenting them in a general and unidentifiable manner.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and NAICS codes

PESP seeks members from among pesticide user companies and organizations, or entities that represent them, that are committed to reducing risks from pests and pesticides by practicing IPM. PESP members can also be companies or organizations that promote the use of IPM through education and training.

PESP offers three basic membership categories, and four program categories (Live, Work, Play, or Farm) based on possible sites where IPM will be implemented. Membership categories are IPM promoters, IPM users, and national IPM users. An example of an IPM promoter is a trade or research organization. IPM users are those PESP members that would have their pesticide use records centrally located, and national IPM users are those PESP members that would have their pesticide use records spread across several company sites, regionally and/or nationally.

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 PESP. However, EPA expects that most applications will come from the following industries:

NAICS Code	Affected Industry
11	Agriculture, Forestry, Fishing and Hunting
111	Crop Production
11142	Nursery and Floriculture Production
111421	Nursery and Tree Production
113	Forestry and Logging
22	Utilities
2211	Electric Power Generation, Transmission and Distribution
5617	Services to Buildings and Dwellings
56171	Exterminating and Pest Control Services
56172	Janitorial Services
56173	Landscaping Services
6111	Elementary and Secondary Schools
6112	Junior Colleges
6113	Colleges, Universities, and Professional Schools
622	Hospitals
6244	Child Day Care Services
71391	Golf Courses and Country Clubs
813312	Environment, Conservation and Wildlife Organizations

4(b) Information Requested

A prospective member completes two forms: The PESP Membership Application Form (EPA Form 9600-02, Attachment G) and one of the two PESP Strategy/Progress Reporting forms described below, as applicable, with a list of IPM measures that the member has selected to commit to and track over time. The two PESP strategy/progress reporting forms are

- All applicants who are not commercial or residential pest control service providers use the Strategy/Progress Reporting Form for PESP Members that are Not Commercial/Residential Pest Control Services (EPA Form No. 9600-01, ATTACHMENT H);
- Applicants from Commercial/Residential Pest Control companies use the PESP Strategy/Progress Reporting Form for Residential/Commercial Pest Control Service Providers (EPA Form No. 9600-03, ATTACHMENT I).

The PESP Strategy/Progress Reporting Forms are multi-purposed. Members use whichever form applies to them (either ATTACHMENT H or I) for submitting their initial PESP member strategy, the annual IPM performance report, or the five-year IPM strategy update.

By January 1st of each year, each member reports on a common set of measures to document progress towards their goals. The set of measures any member reports on is determined by the program category into which the member belongs (Live, Work, Play, or Farm) and whether the member is a commercial/residential pest control company. The PESP strategy process keeps all members—members and EPA—focused on the goal of pesticide risk reduction. Only those members who submit annual PESP Strategy/Progress Reporting Forms will be eligible for *PESP Champions*' awards.

(i) Data Items

The following data items may be reported:

- Organization name
- Name, title, address, phone number, fax number, and email address of primary and secondary contacts
- Member group for which the candidate is applying (Live, Work, Play, or Farm)
- Type of organization (e.g. grower, pest management professional, promotional organization)
- If a membership organization, such as a trade association, the approximate number of members
- PESP strategy, which is a description of actions taken to qualify for membership, as well as selection of the IPM measures on which the candidate plans to report
- Annual report of progress with regard to certain measures of IPM implementation such as pesticide use and risk reduction, and organizational profile

(ii) Respondent Activities

Candidates conduct the following activities to apply for membership in PESP:

- Review PESP material, including criteria for membership tiers (Member Handbook⁶, PESP website)
- Select a primary and secondary contact person for the program
- Complete the PESP Membership Application, including affirming the endorsement of a company authority (e.g., CEO or vice president for health and environment)
- Complete the member's strategy in the PESP Strategy/Progress Reporting form describing actions taken to qualify for membership, as well as selection of the IPM measures which anticipate and plan for a span of five years, and on which the applicant plans to report
- Submit completed form to EPA through the PESP Website, or by fax, mail, or e-mail

⁶ Pesticide Environmental Stewardship Program: Member Handbook (April, 2011)
<http://www.epa.gov/pestwise/peps/documents/peps-handbook.pdf>

Candidates conduct the following activities to continue membership in PESP, to advance in membership levels, pass Agency environmental and criminal compliance screening, and to qualify for awards:

- 1) Submission of Annual Survey (Reporting):
 - Provide an annual progress report on the selected IPM measures using the appropriate PESP Strategy/Progress Reporting Form
 - Upon request, provide relevant documentation to EPA
- 2) Strategy Update:
 - Every five years, submit an updated IPM strategy reflecting the organization's current business practices and IPM strategy. The Agency does not require special or additional standards with strategy updates to continue participating in the PESP program. However, to receive incentives and awards, a PESP member may need to sustain their own performance and stay competitive with pesticide environmental stewardship achievements.

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

5(a) Agency Activities

Under PESP, EPA engages in the following activities:

PESP Membership Application

- Distribute the PESP Membership Application Form to potential members, and maintain an online and downloadable (PDF) version of the form on the PESP Website;
- Answer questions posed by potential members regarding membership;
- Receive completed forms, review to make sure the activities of the prospective member are in line with PESP goals, and place any necessary follow-up calls; and
- Approve candidates for membership and notify both successful and unsuccessful applicants of the decisions.

Annual PESP Progress Report

- Answer questions posed by members regarding annual reporting;
- Receive completed annual progress reports, review for accuracy, and conduct any necessary follow-up communication;
- Perform analyses of the data received in the annual progress reports as necessary.

Five-Year PESP Strategy Update

- Answer questions posed by members regarding 5-year strategy updates;
- Receive updated strategy, review for accuracy, and conduct any necessary follow-up communication;
- Approve or request further development of strategy updates.

PESP Award and Incentives

- Review performance
- Nominate awardee(s)
- Hold award ceremony; give awards

In addition to the above listed activities the Agency also performs an environmental and criminal compliance screening to ensure that all members are good actors. We perform this task by checking Agency data bases both at headquarters and the regions.

5(b) Collection Methodology and Management

Prospective members will be able to obtain the PESP Membership Application and PESP Strategy/Progress Reporting Forms online. In collecting and analyzing the information associated with this ICR, EPA will use a telephone system, personal computers, and applicable database software.

All forms were designed to have a minimum burden on the user. The technology in the PESP Strategy/Progress Reporting Forms provides users with the option of partially completing a form, saving the unfinished form, then returning later to complete the form. Once complete, the form is submitted online. Upon submission, the measurement data are transmitted into an EPA-managed Customer Relationship Management system. This technology can aggregate measures and display data in a variety of graphical and tabular forms. The Agency will leverage this data and technology to achieve the following key goals:

1. Develop case studies to demonstrate the economic value of implementing IPM
2. Reduce burden on members who are promoting IPM to users and collecting IPM implementation data (especially those collecting data on pesticide usage). EPA maintains the current list of registered products. To analyze the pesticide usage one must have the capacity to assess a constantly changing list of registered pesticides for a particular industry. It is easier for EPA to provide this service because we already maintain this information
3. Provide farmers and grower associations with data on effective IPM techniques and pesticide usage (combat resistance, pest issues, and invasive species)
4. Prevent access to and distribution of business information reported by PESP members. Data will only be shared publicly in aggregate form unless otherwise specified and agreed to by the affected PESP member(s).

5(c) Small Entity Flexibility

EPA expects that many of the members in PESP will be small entities. EPA has designed its forms to minimize respondent burden while obtaining sufficient and accurate information. PESP is a flexible program, particularly with regard to the PESP strategy. Although a

comprehensive strategy outline is provided to prospective members, not all of the points in this outline will apply to every prospective member. For example, prospective members who are primarily educational organizations would not complete the portion of the PESP Strategy/Progress Reporting Form having to do with pesticide use. Likewise, some members will elect to not address every point in the PESP strategy outline, due to a lack of resources to collect the necessary information. For these reasons, EPA will review members' annual progress reports, making allowances on a case-by-case basis for the inapplicability of certain elements and the members' abilities to provide the information. Since membership in PESP is voluntary, members may also elect to withdraw from the program, at any time, if they do not wish to submit the annual reporting data needed to maintain membership in the voluntary program and assess eligibility for membership tier.

5(d) Collection Schedule

Organizations may submit the one-time PESP Application Form and PESP strategy package at any time. PESP progress reports are due to EPA by October 1st of each year.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

Respondent paperwork burden of participating in the PESP consists primarily of the administrative burden associated with filling in and submitting a PESP Membership Application, preparing and submitting a PESP strategy (using the PESP Strategy/Progress Reporting Form), and preparing and submitting an annual PESP progress report (using the PESP Strategy/Progress Reporting Form). Only new members fill out and submit the PESP Membership Application (one time). All members prepare and submit an annual PESP progress report using the PESP Strategy/Progress Reporting Form. Each member's IPM strategy is updated once every five years.

Burden estimates were prepared for the average time necessary to perform each activity for each member category. Member categories are IPM promoters, IPM users, and national IPM users. An example of an IPM promoter would be a trade or research organization. IPM users are those PESP members that would have their pesticide use records centrally located, and national IPM users are those PESP members that would have their pesticide use records spread across several company sites, regionally and/or nationally, and thus have a larger burden associated with annual reporting. Burden estimates are based on interviews conducted with current PESP members and Agency experience interacting with PESP members.

As shown in Tables 1 through 3, EPA estimates the paperwork burden to prepare and submit the five year PESP strategy (using the applicable PESP Strategy/Progress Reporting Form) to be 10 managerial hours; the burden to prepare and submit the PESP Membership Application for all members is estimated to be 2 managerial hours.

The burden hours for the annual progress report, however, vary by type of member. The

total annual burden hours to prepare and submit the annual progress report or survey are 25, 100, and 300 for IPM promoters, IPM users, and national IPM users, respectively. For each type of member 20% of the hours are managerial, 70% technical, and 10% clerical. In the first year, these hours are used to plan, prepare, and setup to submit the annual PESP surveys. For subsequent years, the paperwork burden estimates are to prepare and submit the survey.

As shown in Table 4, EPA estimates that an average of 424 entities will participate in the PESP per year for the three year ICR period (369 in year one, 424 in year two, and 479 in year three). The yearly increase in the number of members is based on the estimate that an average of 55 new members will join per year in all membership categories, combined. Based on existing PESP data, 181 members are IPM promoters, 179 are IPM users, and 64 are national IPM users. EPA estimates an average of 43,000 annual hours for all members at a cost of \$2.76 million per year.

6(b) Estimating Respondent Costs

Consistent with recent ICR renewals, OPP is using labor cost estimates from Agency economists with respect to wages, benefits and overhead for all labor categories for affected industries, state government, and EPA employees. This approach uses a transparent and consistent methodology and current publicly available data to provide more accurate estimates and allow easy replication of the estimates.

Methodology: The methodology uses data on each sector and labor type for an *Unloaded wage rate* (hourly wage rate), and calculates the *Loaded wage rate* (unloaded wage rate + benefits), and the *fully loaded wage rate* (loaded wage rate + overhead). Fully loaded wage rates are used to calculate respondent costs. Costs are indexed to 2009 dollars.

Unloaded Wage Rate: Wages are estimated for occupations (management, technical, and clerical) within applicable sectors. The Agency uses average wage data for the relevant sectors available in the National Industry-Specific Occupational Employment and Wage Estimates from the Bureau of Labor Statistics (BLS) at <http://www.bls.gov/oes/current/oesrci.htm>.

Sectors: The specific NAICS code and website for each sector is included in that sector's wage rate table. Within each sector, the wage data are provided by Standard Occupational Classification (SOC). The SOC system is used by Federal statistical agencies to classify workers into occupational categories for the purpose of collecting, calculating, or disseminating data (see http://www.bls.gov/oes/current/oes_stru.htm). The managerial labor rate is based on the SOC for management occupations, and the clerical labor rate is based on the SOC for office and administrative support occupations. The technical labor rate is based on the SOC for life, physical and social science occupations for IPM promoters and National IPM users. For IPM users the technical rate is based on first-line supervisors/managers of landscaping, lawn service, and grounds keeping workers.

Loaded Wage Rate: Benefits represent 44% of unloaded wage rates, based on benefits for all civilian non-farm workers, from <http://www.bls.gov/news.release/ecec.t01.htm>.

Fully Loaded Wage Rate: The loaded wage rate is multiplied by 50% (EPA guidelines 20-70%) to get overhead costs.

A copy of the formula work sheets used to estimate the labor rates based on 2011 data and to derive the fully loaded rates and overhead costs for this new ICR are listed in ATTACHMENT J. Tables 1, 2, and 3 below provide member burden and cost estimates by activity for IPM promoters, IPM users, and national IPM users, respectively.

Table 1: Average Annual Burden and Cost Estimates for IPM Promoters

Collection Activities per IPM Promoter	Burden Hours			Total	
	Management	Technical	Clerical	Hours	Costs
	\$141.39 per hour	\$75.73 per hour	\$38.90 per hour		
Activities for current members					
Prepare and submit PESP strategy ²	2.0	0.0	0.0	2.0	\$283
Prepare and submit PESP annual Survey ³	5.0	17.5	2.5	25.0	\$2,130
TOTAL BURDEN per member	7.0	17.5	2.5	27.0	\$2,412
Activities for new members					
Complete and submit application form ¹	2.0	0.0	0.0	2.0	\$283
Prepare and submit PESP strategy ²	10.0	0.0	0.0	10.0	\$1,414
Plan, prepare, and setup for annual PESP surveys ³	5.0	17.5	2.5	25.0	\$2,130
TOTAL BURDEN per member	17.0	17.5	2.5	37.0	\$3,826
All IPM Promoters					
	Existing members	Hours per member	Total hours	Cost per member	Total cost
Current members – 3 year annual average	166	27	4,482	\$2,412	\$400,444
New members per year	15	37	555	\$3,826	\$57,393
TOTAL 3 year annual average for all members	181		5,037		\$457,837

Wage rate source: BLS for NAICS 541600 - Management, Scientific, and Technical Consulting Services.

1. Only new members fill out and submit a PESP Membership Application.
2. All members prepare and submit PESP strategy once every five years. For current members: 10 hours per strategy / 5 years = 2 hours per year.
3. New members plan, prepare, and setup for the PESP survey during the first year. After the first year current members submit the annual PESP survey.

Table 2: Average Annual Burden and Cost Estimates for IPM Users

Collection Activities per IPM User	Burden Hours			Total	
	Management	Technical (1 st Line Supervisor)	Clerical	Hours	Costs
	\$93.97	\$51.55	\$30.06		
	per hour	per hour	per hour		
Activities for current members					
Prepare and submit PESP strategy ²	2	0	0	2	\$188
Prepare and submit PESP annual Survey ³	20	70	10	100	\$5,788
TOTAL BURDEN per member	22	70	10	102	\$5,976
Activities for new members					
Fill out and submit application form ¹	2	0	0	2.	\$188
Prepare and submit PESP strategy ²	10	0	0	10	\$940
Plan, prepare, and setup for annual PESP surveys ³	20	70	10	100	\$5,788
TOTAL BURDEN per member	32	70	10	112	\$6,916
All IPM Users					
	Existing members	Hours per member	Total hours	Cost per member	Total cost
Current members - 3 year annual average	154	102	15,708	\$5,976	\$920,356
New members per year	25	112	2,800	\$6,916	\$172,902
TOTAL 3 year annual average for all members	179		18,508		\$1,093,257

Wage rate source: BLS for NAICS 561710 - Exterminating and Pest Control Services.

1. Only new members fill out and submit a PESP Membership Application.

2. All members prepare and submit PESP strategy once every five years. For current members: 10 hours per strategy / 5 years = 2 hours per year.

3. New members plan, prepare, and setup for the PESP survey during the first year. After the first year current members submit the annual PESP survey.

Table 3: Average Annual Burden and Cost Estimates for National IPM Users.

Collection Activities per National IPM User	Burden Hours			Total	
	Management	Technical	Clerical	Hours	Costs
	\$108.17 per hour	\$51.50 per hour	\$34.69 per hour		
Activities for current members					
Prepare and submit PESP strategy ²	2	-	-	2	\$216
Prepare and submit PESP annual Survey ³	60	210	30	300	\$18,347
TOTAL BURDEN per member	62	210	30	302	\$18,563
Activities for new members					
Fill out and submit application form ¹	2	-	-	2	\$216
Prepare and submit PESP strategy ²	10	-	-	10	\$1,082
Plan, prepare, and setup for annual PESP surveys ³	60	210	30	300	\$18,347
TOTAL BURDEN per member	72	210	30	312	\$19,645
All National IPM Users					
	Existing members	Hours per member	Total hours	Cost per member	Total cost
Current members - 3 year annual average	49	302	14,798	\$18,563	\$909,595
New members per year	15	312	4,680	\$19,645	\$294,674
TOTAL 3 year annual average for all members	64		19,478		\$1,204,269

Wage rate source: BLS for NAICS 311000 - Food Manufacturing.

1. Only new members fill out and submit a PESP Membership Application.
2. All members prepare and submit PESP strategy once every five years. For current members: 10 hours per strategy / 5 years = 2 hours per year.
3. New members plan, prepare, and setup for the PESP survey during the first year. After the first year current members submit the annual PESP survey.

Table 4 summarizes the number of members and the average annual burden and cost over a three year period for both existing and new members.

Table 4: Three-year Average Total Annual Burden Hours and Cost for all Members

	Members	Total hours	Total cost
IPM Promoters	181	5,037	\$457,837
IPM Users	179	18,508	\$1,093,257
National IPM Users	64	19,478	\$1,204,269
All Members	424	43,023	\$2,755,363

6(c) Estimating Agency Burden and Cost

For this ICR, the Agency is using internal data from OPP Divisions that provide significant support and analysis for PESP. These data are taken from the Time and Attendance Information System (TAIS), which archives the Agency's Full Time Equivalents (FTEs) for most OPP program activities. The ICR contains appropriate FTE activity data from the Antimicrobials Division (AD), Biological and Economic Analysis Division (BEAD), Biopesticide and Pollution Prevention Division (BPPD), Environmental Fate and Effects Division (EFED), Health Effects Division (HED), Registration Division (RD), and the Pesticide Reevaluation Division (PRD). The Agency believes that using data from the TAIS reflects internal operations for implementing and administering PESP activities.

Table 5 shows the FTEs by division and type of labor and summarizes the total burden hours and cost.

Table 5: Average Annual Agency Burden and Cost

Division	FTEs (full time equivalent person years)								Total burden hours	Wage per hour	Total Cost \$1000s
	BEAD	RD	EFED	PRD	HED	AD	BPPD	Total			
Managerial	<0.01	<0.01	<0.01	0.00	0.01	0.01	0.77	0.79	1,641	\$120.32	\$197
Technical	0.01	<0.01	0.02	0.00	0.07	0.07	6.96	7.13	14,836	\$77.85	\$1,155
Clerical	<0.01	<0.01	<0.01	0.00	<0.01	<0.01	0.31	0.31	650	\$44.05	\$29
Total	0.02	<0.01	0.03	0.00	0.08	0.08	8.03	8.23	17,127		\$1,381

Annual Agency burden hours, 17,127 were calculated by multiplying the number of hours per FTE (2080) by the number of FTE's, 8.23. The annual Agency costs, \$1.38 million were calculated by multiplying the burden hours for each type of labor by their loaded wage rates, and summing the costs for all types of labor.

To determine Agency costs, the Agency used the Bureau of Labor Statistics estimates of labor rates for 2011 for the NAICS code for the Federal Executive Branch (NAICS 999100). The managerial labor rate is based on the SOC (Standard Occupational Classification) for management occupations; the technical labor rate is based on the SOC for life, physical and social science occupations; and the clerical labor rate is based on the SOC for office and administrative support occupations. The labor rates are fully loaded and include benefits and overhead.

6(d) Bottom Line Burden Hours and Costs

Table 6: Total Annual Burden and Cost Summary

	Total hours	Total cost
Respondents	43,023	\$2,755,363
IPM Promoters	5,037	\$457,837
IPM Users	18,508	\$1,093,257
National IPM Users	19,478	\$1,204,269
Agency	17,127	\$1,381,050

6(e) Reasons For Changes in Burden

This is a new ICR.

6(f) Burden Statement

The annual respondent burden for this ICR is estimated to average 43,023 hours (5,037 for IPM promoters, 18,508 hours for IPM users, and 19,478 hours for national IPM users). This includes time to fill out and submit the PESP Membership Application, prepare and submit the PESP strategy, and plan, setup, prepare and submit the annual PESP progress report.

The Agency has established a public docket for this ICR under Docket ID No. EPA-HQ-OPP-2010-0793, which is available for online viewing at <http://www.regulations.gov>, or in person viewing at the OPP Regulatory Public Docket in Rm. S-4400, One Potomac Yard (South Building), 2777 S. Crystal Drive, Arlington, VA. This docket facility is open from 8:30 a.m. to 4 p.m., Monday through Friday, excluding legal holidays. The docket telephone number is (703) 305-5805. Comments are accepted regarding 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.

Comments may be submitted to EPA electronically through <http://www.regulations.gov> or by mail addressed to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. You can also send comments to the Office of Information and Regulatory Affairs, of the Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Include docket ID No. EPA-HQ-OPP-2010-0793 and OMB control number 2070-NEW in any correspondence

LIST OF ATTACHMENTS

All of the attachments listed below can be found in the docket for this ICR or a hyperlink is provided for the source documentation. The docket for the action is accessible electronically through <http://www.regulations.gov> using the docket identifier EPA-HQ-OPP-2010-0793.

- ATTACHMENT A: PESP Membership Levels Flow Chart
- ATTACHMENT B: 42 UCS 133 Pollution Prevention Act of 1990, available at <http://www.gpo.gov/fdsys/pkg/USCODE-2009-title42/pdf/USCODE-2009-title42-chap133.pdf>
- ATTACHMENT C: 7 USC 136a_Registration of Pesticides
- ATTACHMENT D: USC 136r-1, The Food Quality Protection Act, available at <http://www.gpo.gov/fdsys/pkg/USCODE-2010-title7/pdf/USCODE-2010-title7-chap6-subchapII-sec136r-1.pdf>.
- ATTACHMENT E: Response to Public Comments on the Pesticide Environmental Stewardship Program Annual measures Reporting Information Collection Request
- ATTACHMENT F: EPA Response to PESP ICR Comments Posted 3-20-12
- ATTACHMENT G: PESP Membership Application (EPA Form No. 9600-02)
- ATTACHMENT H: Strategy/Reporting Form for PESP Members that are Not Commercial/Residential Pest Control Services (EPA Form No. 9600-01).
- ATTACHMENT I: PESP Strategy/Progress Reporting Form for Residential/Commercial Pest Control Service Providers (EPA Form No. 9600-03)
- ATTACHMENT J: Worksheets Used to Calculate Labor Costs for IPM Promoters, IPM Users, National IPM Users, and EPA