

## Attachment F

### Calculations Regarding Small Entities that Participate in this ICR

EPA estimated the number of small entities that participate under this ICR using information on company revenue and employment from Dun and Bradstreet database reported for the year 2010. The Dun and Bradstreet database is a comprehensive source of financial information on entities, including firm locations, sales, number of employees, and primary business classifications under North American Industrial Classification System code (NAICS). EPA assumed the majority of respondents are individual companies with a NAICS code 325320 (Pesticide and Other Agricultural Chemical Manufacturing).

The number of companies in the Dun and Bradstreet 2010 database using this code was 892. EPA was able to determine the size of 882 of these individual companies. The parent company of the 10 remaining un-sized companies did not report enough sales or employee data to allow a proper analysis based on the SBA size classifications. Of the sized firms, 26.3% (232) are large firms or are subsidiaries of large firms, and 73.7% (650) are small firms or subsidiaries of small firms. Currently, 1733 companies are listed in EPA's registration tracking database discussed in section 5(b). Assuming that the distribution of large and small firms is independent of NAICS code, EPA estimates that there are 456 (26.3% of 1733) large firms and 1277 (73.7 % of 1733) small firms that are potential respondents to this ICR.

EPA also estimated the impact of this ICR on small entities by calculating the annual company burden as a percentage of average annual revenue. Child Resistant Packaging applications were submitted to the Agency by 49 parent firms between 2006 and 2009. EPA determined that 27 of the submitting companies were large and 21 were small based on information from the Dun and Bradstreet 2010 database. Table F.1 exhibits list of small entities that submitted CRP applications between 2006 and 2009. Companies are listed at the parent level. The table includes company NAICS code, annual sales, employment, US Small Business Administration (SBA) small business definition, and SBA size threshold. EPA was unable to size one company.

Table F.1

<b>Parent Company</b>	<b>NAICS Code</b>	<b>Annual Sales (\$)</b>	<b>Employees</b>	<b>SBA Definition<sup>1</sup></b>	<b>SBA Size Threshold<sup>1</sup></b>
Alden - Leeds, Inc.	325998		75	E	500
American Vanguard Corporation	325320	237,538,000	320	E	500
Aqua Tri	424690	2,000,000	24	E	100
Biosensory Insect Control	561710	130,000	3	R	6,000,000
Bonide Products, Inc.	325998	35,700,000	200	E	500
Bug Stompers Inc	561710	200,000	3	R	6,000,000
Clarke Mosquito Control Products, Inc.-	325320	35,000,000	40	E	500
Control Solutions, Inc.	325320		50	E	500
Db Square LLC	561990	100,000	2	R	6,000,000

Envirosafe Technologies, Inc.	334112	2,200,000	18	E	1,000
Gil Manufacturing Inc	453998	1,100,000	11	R	6,000,000
Haco Group Inc	423610	250,000	2	E	100
McLaughlin Gormley King Company	325320	1,000,000	90	E	500
Pbi/Gordon Corporation	325320		300	E	500
Pic Corporation (inc)	325320	5,400,000	30	E	500
Porpoise Pool & Patio, Inc.	533110	1,000,000	280	R	6,000,000
Share Corporation	325612	16,900,000	172	E	500
Southeast Laboratories, Inc.	335314	250,000	3	E	750
Spurrier Chemical Companies, Inc.	325199	20,900,000	67	E	1,000
Vertex Chemical Corp	325188	52,000,000	45	E	1,000
Vetsource, Inc.	423390	3,000,000	2	E	100

1. An “E” indicates that the SBA small business definition is based on employment and an “R” indicates that the SBA small business definition is based on revenue from annual sales. Definitions and SBA size thresholds are based on the US Small Business Administration’s 2008 “Table of Small Business Size Standards Matched to North American Industry Classification System Codes” available online at:

[http://www.sba.gov/idc/groups/public/documents/sba\\_homepage/serv\\_sstd\\_tablepdf.pdf](http://www.sba.gov/idc/groups/public/documents/sba_homepage/serv_sstd_tablepdf.pdf)

Table F.2 below presents the total and average revenue and employment for small companies, large companies, and all companies combined. As shown below in Section 6, the burden cost per CRP submission is estimated to be approximately \$439 (Table 2, section 6). Assuming that CRP submissions are evenly distributed across small and large companies, an average firm would submit approximately 14 CRP applications per year, assuming 50 companies are responsible for the 685 (see Table 1, section 6) CRP submissions in a given year. This would result in an average annual company burden of \$6,146, or 0.03% of small firm’s annual revenue, on average.

Table F.2

	<b>Total Number of Firms</b>	<b>Total Revenue (\$)</b>	<b>Total Employee Size</b>	<b>Average Revenue<sup>1</sup> (\$)</b>	<b>Average Employment<sup>1</sup></b>
Small Firms	21	414,668,000	1,737	23,037,111	73
Large Firms	27	312,730,280,167	598,975	12,028,087,699	23,031
<b>All Firms</b>	<b>48</b>	<b>313,144,948,167</b>	<b>600,712</b>	<b>7,116,930,640</b>	<b>13,639</b>

<sup>1</sup> Only based on firms that report sales on D&B.