

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

**1 IDENTIFICATION OF THE INFORMATION COLLECTION**

**1(a) Title and Number of the Information Collection**

**TITLE: Safer Detergent Stewardship Initiative (SDSI) Program**

**EPA ICR No.: 2261.03      OMB Control No.: 2070-0171**

**1(b) Short Characterization**

This renewal information collection request (ICR) addresses the submission of applications to EPA for recognition under the Safer Detergent Stewardship Initiative (SDSI) Program. EPA announced the program as part of a *Federal Register* notice (71 FR 9337; February 23, 2006) that announced the availability of the Final Aquatic Life Ambient Water Quality Criteria for Nonylphenol. Nonylphenol ethoxylates (NPEs) and their breakdown products, such as nonylphenol, are toxic to aquatic life. SDSI will complement EPA's Aquatic Life Criteria by encouraging the manufacture and use of safer surfactants, thus reducing the amount of nonylphenol ethoxylate surfactants and nonylphenol in streams and other water bodies. The Design for the Environment (DfE) program has identified safer alternatives to NPE surfactants through its partnership work with industry and environmental advocates; many are comparable in cost and are readily available.

Under SDSI, EPA recognizes environmental leaders who voluntarily commit to the use of safer surfactants. Safer surfactants are surfactants that break down quickly to non-polluting compounds. Surfactants are used in a wide variety of applications and products. Examples include detergents, cleaners, airplane deicers, and fire-fighting foams. SDSI is designed to encourage a shift to safer surfactants by companies unaware of the benefits of such a change. SDSI is also intended to attract companies that see value in the public recognition of corporate product stewardship that SDSI will provide.

There are two categories for recognition under SDSI: Champion and Partner. Champion is the highest level of recognition offered under SDSI. At this level, the participant is listed on the EPA SDSI website as a Champion and may use a special logo in their literature to help explain their participation in the program. The Partner category provides recognition of significant accomplishment towards the use of safer surfactants. Partners will be listed on the EPA SDSI website and may be granted recognition as a Champion in the future, if appropriate.

EPA may also ask respondents with Champion status to make information available to EPA for review to verify that Champion status respondents have not taken action that would disqualify them from continued recognition and use of EPA's SDSI logo in product literature. For example, in confirming continued eligibility for a formulating company, EPA would look to

review information such as production-related records (which are already required by EPA) to ensure that the company used only safer surfactants (i.e., surfactants that break down quickly to non-polluting compounds) in its products.

Candidates post a statement on their website describing the actions that qualify them for recognition under SDSI. Candidates also complete an application that describes the actions taken to qualify for recognition and have it signed by a company authority (e.g., Chief Executive Officer, or vice president with responsibility for product formulation).

## **12. NEED FOR AND USE OF THE COLLECTION**

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

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

SDSI's information collection activities will assist the Agency in meeting the goals of the PPA by providing resources and recognition for businesses committed to promoting and using safer surfactants. In turn, SDSI will help businesses meet their corporate sustainability goals by providing the means to, and an objective measure of, environmental stewardship. Investment analysts and advisers seek these types of measures in evaluating a corporation's sustainability profile and investment worthiness.<sup>1</sup> SDSI is also needed to promote greater use of safer surfactants by companies unaware of the benefits of such a change. EPA has carefully tailored its request for information, and especially the SDSI Application Form (EPA Form 6300-2), to ensure that it only asks for information essential to verifying an applicants' eligibility for award or recognition.

### **1 2(b) Practical Utility/Users of the Data**

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

In addition, EPA and stakeholders will be able to track the progress of the program, both on the level of participation and expected environmental benefits. For environmental benefits, EPA will use its own Chemical Data Reporting Rule<sup>2</sup> to establish a baseline and track changes in the levels of nonylphenol ethoxylate manufactured, imported and used in the U.S. EPA may also

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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

make use of ongoing studies that monitor the level of contaminants, like nonylphenol, in various water bodies and sediment. EPA will review information sources for endpoints such as level of program participation, trends in surfactant use, and levels of toxic surfactant degrades in waters and sediment. Although EPA has not yet evaluated whether there is a correlation between SDSI participation and environmental outcomes, EPA remains committed to measuring the effectiveness of this program over the next three years.

### **13. 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 SDSI program is unique and is not duplicative of previous information collection requests. When developing the program, EPA also checked with trade associations and potential partners to confirm that the information being collected by the SDSI program does not exist elsewhere.

#### **1 3(b) Public Notice Required Prior to ICR Submission to OMB**

1 In proposing to renew this ICR, EPA provided a 60-day public notice and comment period that ended on December 2, 2013 (78 FR 60867, October 2, 2013). EPA received no comments during the comment period.

#### **1 3(c) Consultations**

EPA announced its intentions to develop the SDSI program in February 2006. Since EPA announced the SDSI program in February 2006, EPA has received significant feedback on the SDSI program from stakeholders. EPA continues to work closely with stakeholders that include surfactant manufacturers, cleaning product formulators, environmentalists, water treatment facilities, and cleaning industry trade associations.

On June 12, 2006, DfE held a public meeting to take comments on SDSI. Senior managers from EPA's Office of Science and Technology (Office of Water) and Office of Pollution Prevention and Toxics provided overviews of EPA's Aquatic Life Criteria for Nonylphenol and SDSI. A clear majority of stakeholders representing a broad range of interests – surfactant manufacturers, cleaning product formulators, environmentalists, a water treatment facility, and a cleaning industry trade association – expressed strong support for SDSI. Stakeholders who spoke to express support for the program at the public meeting include:

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<sup>2</sup> The Chemical Data Reporting (CDR) Rule requires companies that manufacture, import or use certain chemicals listed on the TSCA inventory to report to EPA information about these chemicals (e.g., production/use volume) on a periodic basis. CDR reporting occurs every four years. The CDR data for calendar year 2011 was recently released for public use in February 2013.

Paul Anastas, Green Chemistry Institute  
Bill Balek, ISSA  
Bill Greggs, Procter & Gamble  
Cory Hammock, Clean Control  
Marsha Hardin, Reckitt Benckiser  
Lauren Heine, GreenBlue  
Ed Hopkins, Sierra Club  
Jennifer Jackson, East Bay Municipal Utility District  
Jack Linard, Unilever  
Rich Liroff, World Wildlife Fund  
David Long, SC Johnson  
Roger McFadden, Coastwide Chemicals  
Sam Moore, Burlington Chemical

A minority of stakeholders, representing the Alkylphenol Ethoxylate Research Council (APEREC), alkylphenol ethoxylate (APE)<sup>1</sup> and alkylphenol (AP) manufacturers, and two laundry trade associations (large APE users), expressed concerns about SDSI. Their concerns are summarized in the June 12 public meeting notes.<sup>2</sup> EPA has taken steps to ameliorate these concerns. These steps include (1) clarifying that the intent of the program is to encourage the use of safer surfactants; the use of any surfactants (not solely NPE surfactants) that degrade to long-lived and more toxic degradates would disqualify an applicant from recognition; (2) requiring that a company eligible for recognition have a product stewardship strategy to ensure the use of safer surfactants; and (3) limiting the scope of the program to those products whose use routinely results in their discharge to the environment; products such as ink, paint, and oil are not included.

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 several parties via email. The individuals contacted were:

Bill Balek, Director of Legislative Affairs  
ISSA  
bill@issa.com  
800-225-4772

Kathy Stanton, Director, Technical & Regulatory Affairs  
The American Cleaning Institute (ACI)  
KStanton@CleaningInstitute.org  
202-662-2513

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<sup>1</sup> NPEs are part of the APE family of chemicals.

<sup>2</sup> The meeting notes are available in the public docket ([Docket ID No. EPA-HQ-OPPT-2006-0343](#)), which can be accessed online via [Regulations.gov](#).

Beth Law, Assistant General Counsel  
Consumer Specialty Products Association (CSPA)  
Vice President of International Affairs  
blaw@cspa.org  
202-833-730

EPA received one response to its solicitation for consultations, from ISSA. The substance of the response was entirely supportive of the information collection and did not result in any revisions to the supporting statement. Copies of EPA's consultation e-mail to the above potential respondents, and of the single response, are included in Attachment C.

### **1 3(d) Effects of Less Frequent Collection**

The SDSI Application Form is designed to be a one-time information submission for organizations that wish to participate in the SDSI program as either a Partner or Champion. In some instances, an organization that applies for Partner recognition may choose to re-apply at a later date for Champion recognition. Without this information, EPA will not be able effectively to determine whether companies are switching to safer surfactants nor recognize companies who successfully transition to safer surfactants.

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### **3(e) General Guidelines**

The information collection activities discussed in this renewal ICR comply with all regulatory guidelines under 5 CFR 1320.5(d)(2).

### **1 3(f) Confidentiality**

No information collected by EPA under SDSI comprises confidential business information.

### **1 3(g) Sensitive Questions**

The information collection activities discussed in this document do not involve any sensitive questions.

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

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

SDSI seeks partners from establishments engaged in the production or use of surfactants, as well as establishments involved in the purchasing, distribution or use of products containing surfactants, whose use routinely results in their discharge to the environment. Others (e.g., non-profit organizations, unions, academia) may also qualify through active encouragement of the use of safer surfactants.

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

<u>NAICS Code</u>	<u>Affected Industry</u>
3256	Soap, Cleaning Compound, and Toilet Preparation Manufacturing
424490	Other Grocery and Related Products Merchant Wholesalers
424690	Other Chemical and Allied Products Merchant Wholesalers
424990	Other Miscellaneous Nondurable Goods Merchant Wholesalers
4451	Grocery Stores
481	Air Transportation
561210	Facilities Support Services
561720	Janitorial Services
561740	Carpet and Upholstery Cleaning Services
611310	Colleges, Universities, and Professional Schools
7211	Traveler Accommodation
8123	Drycleaning and Laundry Services

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

Once a prospective organization reviews the SDSI materials and decides to apply, it submits a SDSI Application Form (EPA Form 6300-2) (see Attachment B for complete form). Forms are available in hard copy or electronic form. Participants can use the hard copy forms they receive from EPA by mail or download PDF versions of the forms from the SDSI website. Applications will be received on an ongoing basis over the three years covered by this ICR. Champion status respondents maintain information already required by EPA, such as production-related records, that the Agency may review in order to verify that the company used only safer surfactants (i.e., surfactants that break down quickly to non-polluting compounds) in its products thereby confirming that their subsequent surfactant uses have not disqualified them from continued recognition and use of EPA's SDSI logo in product literature.

##### (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;
- Status (partner or champion) for which the candidate is applying;
- Type of organization (e.g. manufacturing, purchasing, retail);
- Description of facility and any relevant affiliations;
- Descriptions of actions taken to qualify for recognition;
- Commitment statement, on the company's website or other public documents, showing one or more of the following (requirements vary by organization type and recognition

level): evidence of a full or intended transition to safer surfactants; a strategy to ensure that only safer surfactants are used or purchased by specified dates; a written commitment to a full transition to safer surfactants within a specific time period; activities taken to date to promote the use of safer surfactants;

- Total production or use volume of surfactants, where applicable; and
- Signature, name, and title of senior company authority (e.g., CEO or vice president for health and environment).

(ii) Respondent activities:

Candidates post a statement on their website describing the actions that qualify them for recognition under SDSI. In addition, candidates conduct the following activities in order to complete and submit the SDSI Application Form (EPA Form 6300-2):

- Review the SDSI information;
- Decide whether to apply for recognition, and whether to apply for partner or champion status;
- Select a primary contact person for the program;
- Complete the SDSI Application Form, including obtaining the signature of a company authority (e.g., CEO or vice president for health and environment);
- Describe how their organization meets the evaluation criteria for the relevant recognition;
- Fax, mail, or scan and e-mail the signed completed form to EPA; and
- Provide relevant documentation to EPA upon request.

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

**5(a) Agency Activities**

Under SDSI, EPA engages in the following activities related to the SDSI Application Form:

- Distribute the SDSI Application Form to potential participants, and maintain a downloadable PDF version on the SDSI website;
- Answer questions posed by potential applicants regarding recognition under the Initiative;
- Receive the completed forms, review for accuracy, and place any necessary follow-up calls; and
- Approve candidates for recognition and notify both successful and unsuccessful applicants of the decisions.

EPA is committed to evaluating whether there is a correlation between SDSI participation and environmental outcomes by using Chemical Data Reporting Rule data to establish a baseline and track changes in the levels of nonylphenol ethoxylate manufactured, imported and used in the U.S. EPA may also make use of ongoing studies that monitor the level of contaminants, like nonylphenol, in various water bodies and sediment. EPA will review information sources for

endpoints such as level of program participation, trends in surfactant use, and levels of toxic surfactant degradates in waters and sediment. EPA may also review a respondent's production-related records to verify that the company used only safer surfactants (i.e., surfactants that break down quickly to non-polluting compounds) in its products thereby confirming that their subsequent surfactant uses have not disqualified them from continued recognition and use of EPA's SDSI logo in product literature.

#### **1 5(b) Collection Methodology and Management**

Respondents can obtain the SDSI Application Form in hard copy from EPA or by downloading it from the SDSI website. The signed, completed forms can be faxed, mailed, or scanned and e-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 the list of ingredients (e.g., bills of lading, invoices) or other relevant documentation at any time to confirm that candidates have achieved the criteria for recognition.

#### **1 5(c) Small Entity Flexibility**

EPA expects that some of the participants in the SDSI 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.

#### **1 5(d) Collection Schedule**

Organizations may submit a one-time application for recognition as Partners or Champions at any time.

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

1Exhibit 6.1 presents the estimated burden hours and costs for all respondents during each of the three years covered under this ICR, assuming 10 hours per respondent. No capital or operations and management costs are incurred by respondents under this ICR.

The data collection mechanism for SDSI is the SDSI Application Form (EPA Form 6300-2). In an effort to minimize burden and cost, the SDSI Application Form was designed with straightforward questions and in a way that one application package will serve all types of participants. The expected participant categories for SDSI are as follows: chemical manufacturers, formulators, retailers / distributors, institutional purchasers, and "others." Among these participant categories, it is expected that the chemical manufacturers, formulators, retailers / distributors, and institutional purchasers will be private sector institutions. Within the participant category "others," it is expected that participants will represent unions, non-profits, or academia.



## 6(a) Estimating Respondent Burden

The average respondent burden is estimated to be 10 hours per respondent. EPA used professional judgment to arrive at a burden estimate and then consulted representatives from the participant categories to evaluate whether the burden estimate was reasonable (see section 3(c)). Burden hours for the SDSI application package are for reporting purposes only and include posting relevant information on the applicant website.

We expect 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 3 hours (1 managerial, 1 technical, 1 clerical). Completing the application form will take about 5 hours (4 technical, 1 clerical) and posting information on a company website will take 1 hour (1 technical). Included in the application form estimate of 5 hours is the potential burden that would be incurred if EPA finds it necessary to verify the information in the application. For purposes of the burden estimate, EPA assumes that it will need to verify information from one organization in each participant category, and each audit will take about 8 hours. This burden, when distributed among all participants, is about 57 minutes per participant ((8 hrs x 5 participants) / 42 total participants).

## 6(b) Estimating Respondent Costs

EPA estimates an average loaded hourly labor rate (base hourly rate plus fringe and overhead) of \$73 for managerial staff, \$65 for technical staff, and \$30 for clerical staff. These three labor rate estimates are based upon manufacturing industry wage data from the Bureau of Labor Statistics (BLS) *Employer Costs for Employee Compensation, Supplementary Tables* from March 2013<sup>1</sup> and are presented in Exhibit 6.2 of the supporting statement. The hourly labor rates include a 17% overhead; this overhead rate is used for consistency with OPPT economic analyses for two major rulemakings: *Wage Rates for Economic Analyses of the Toxics Release Inventory Program*<sup>2</sup> and the *Revised Economic Analysis for the Amended Inventory Update Rule: Final Report*.<sup>3</sup> In addition, the hourly labor rates have been rounded for the purposes of this ICR. The type of staff needed to complete the SDSI Application Form and their associated hourly labor rates were verified during the original information collection approved by OMB by contacting representatives from the participant categories. It is expected that these estimates will remain the same for this renewal.

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<sup>1</sup> BLS, 2013. *Employer Costs for Employee Compensation – December 2006-March 2013, "Table 2: Private Manufacturing Industry Workers, by occupational group, employer costs per hours worked for employee compensation and costs as a percentage of total compensation"*. Available at <http://www.bls.gov/ncs/ect/sp/ecsuhst.pdf>.

<sup>2</sup> EPA, 2002. U.S. EPA, Office of Pollution Prevention and Toxics, Economic and Policy Analysis Branch, *Wage Rates for Economic Analysis of the Toxics Release Inventory Program*. Washington, DC: June 10, 2002.

<sup>3</sup> EPA, 2002. U.S. EPA, Office of Pollution Prevention and Toxics, Economic and Policy Analysis Branch. *Revised Economic Analysis for the Amended Inventory Update Rule: Final Report*. Washington, DC. August 2002.

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

EPA estimates that 42 applications will be submitted over the three-year life of the clearance. This estimate is based on the actual number of SDSI applications submitted over the last three years (84 applications). It is estimated that EPA will receive about one half as many applications (or 42 applications) over the three-year cycle of this ICR, based on the assumption that many companies in the potential universe of respondents have either already applied or have decided not to participate. Over the next three years, EPA expects additional companies will apply that may not have previously heard of SDSI or who have only recently met the criteria for Champion or Partner. Furthermore, based on past experience with SDSI, EPA estimates that the vast majority of participating companies will be formulators, along with a small number of chemical manufacturers, retailers/distributors, institutional purchasers, and others. The total burden hours and labor costs associated with this information collection over the three-year cycle are 420 hours and \$24,696, respectively (see Exhibit 6.1). The annual burden and cost, therefore, are 140 hours and \$8,232. This ICR does not impose capital or O&M costs.

## **1 6(d) Estimating Agency Burden and Costs**

1Exhibit 6.3 presents 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 this information collection and other voluntary programs.

Based on the general schedule (GS) pay schedule, EPA estimates an average hourly labor rate (hourly rate plus the standard government overhead factor of 1.6) of \$77 for managerial staff, \$57 for technical staff, and \$26 for clerical staff.<sup>4</sup> The Agency expects most activities to be performed by managerial staff (25 percent) and technical staff (75 percent).

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<sup>4</sup> EPA labor costs are based on annual federal wage rates published by the Office of Personnel Management for the 2013 General Schedule (Base) Pay Tables. These three labor rates were estimated using the following GS-levels: GS-13 Step-5 for managerial staff (\$48.35/hour), GS-10 Step-10 for technical staff (\$35.42/hour), and GS-5 Step-1 for clerical staff (\$16.33/hour). [http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2013/general-schedule/dcb\\_h.pdf](http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2013/general-schedule/dcb_h.pdf)

### 1Exhibit 6.1. Estimated Burden and Costs to Respondents<sup>0</sup>

1Type of Affected Public	Collection activity		Estimated burden per response (hours)			Total burden (hours)				Hourly labor cost			Total labor cost
			M	T	C	M	T	C	Total	M	T	C	
Private Sector	<b>Chemical Manufacturers</b>	1											
	▪ Review application and program information		0	1	0	0	1	0	1	\$73	\$65	\$30	\$65
	▪ Obtain senior approval		1	1	1	1	1	1	3	\$73	\$65	\$30	\$168
	▪ Complete and submit package <sup>0</sup>		0	4	1	0	4	1	5	\$73	\$65	\$30	\$290
	▪ Post information on website		0	1	0	0	1	0	1	\$73	\$65	\$30	\$65
	<b>Subtotal</b>	<b>1</b>	<b>1</b>	<b>7</b>	<b>2</b>	<b>1</b>	<b>7</b>	<b>2</b>	<b>10</b>	--	--	--	<b>\$588</b>
	<b>Formulators</b>	32											
	▪ Review application and program information		0	1	0	0	32	0	32	\$73	\$65	\$30	\$2,080
	▪ Obtain senior approval		1	1	1	32	32	32	96	\$73	\$65	\$30	\$5,376
	▪ Complete and submit package <sup>6</sup>		0	4	1	0	128	32	160	\$73	\$65	\$30	\$9,280
	▪ Post information on website		0	1	0	0	32	0	32	\$73	\$65	\$30	\$2,080
	<b>Subtotal</b>	<b>32</b>	<b>1</b>	<b>7</b>	<b>2</b>	<b>32</b>	<b>224</b>	<b>64</b>	<b>320</b>	--	--	--	<b>\$18,816</b>
	<b>Institutional Purchasers</b>	4											
	▪ Review application and program information		0	1	0	0	4	0	4	\$73	\$65	\$30	\$260
	▪ Obtain senior approval		1	1	1	4	4	4	12	\$73	\$65	\$30	\$672
	▪ Complete and submit package <sup>6</sup>		0	4	1	0	16	4	20	\$73	\$65	\$30	\$1,160
	▪ Post information on website		0	1	0	0	4	0	4	\$73	\$65	\$30	\$260
	<b>Subtotal</b>	<b>4</b>	<b>1</b>	<b>7</b>	<b>2</b>	<b>4</b>	<b>28</b>	<b>8</b>	<b>40</b>	--	--	--	<b>\$2,352</b>
	<b>Retailers/Distributors</b>	1											
▪ Review application and program information		0	1	0	0	1	0	1	\$73	\$65	\$30	\$65	
▪ Obtain senior approval		1	1	1	1	1	1	3	\$73	\$65	\$30	\$168	
▪ Complete and submit package <sup>6</sup>		0	4	1	0	4	1	5	\$73	\$65	\$30	\$290	
▪ Post information on website		0	1	0	0	1	0	1	\$73	\$65	\$30	\$65	
<b>Subtotal</b>	<b>1</b>	<b>1</b>	<b>7</b>	<b>2</b>	<b>1</b>	<b>7</b>	<b>2</b>	<b>10</b>	--	--	--	<b>\$588</b>	
Private Sector and Local Government	<b>Others (e.g. non-profits, unions, academia)</b>	4											
	▪ Review application and program information		0	1	0	0	4	0	4	\$73	\$65	\$30	\$260
	▪ Obtain senior approval		1	1	1	4	4	4	12	\$73	\$65	\$30	\$672
	▪ Complete and submit package <sup>6</sup>		0	4	1	0	16	4	20	\$73	\$65	\$30	\$1,160
	▪ Post information on website		0	1	0	0	4	0	4	\$73	\$65	\$30	\$260
<b>Subtotal</b>	<b>4</b>	<b>1</b>	<b>7</b>	<b>2</b>	<b>4</b>	<b>28</b>	<b>8</b>	<b>40</b>	--	--	--	<b>\$2,352</b>	
<b>Total (3 years)</b>		<b>42</b>							<b>420</b>				<b>\$24,696</b>

<sup>0</sup> This ICR does not impose capital or OEM costs.

<sup>6</sup> Includes burden of verifying data (about 8 hours), which EPA estimates will only need to be done for 1 organization in each participant category. This burden, when distributed among all participants, is about 57 minutes per participant ((8 hrs x 5 participants) / 42 total participants).

**Exhibit 6.2. Derivation of Respondent Loaded Labor Rates using Q2 2010 Data**

Labor Category	Data Sources <sup>a</sup>	Wage	Fringe Benefit	Fringes as % wage	Over-head % wage <sup>b</sup>	Fringe + overhead factor	Loaded Wages
		(a)	(b)	(c)=(b)/(a)	(d)	(e)=(c)+(d)+1	(f)=(a) × (e)
<b>Managerial</b>	BLS ECEC, Private <b>Manufacturing industries</b> , “Mgt, Business, and Financial”	\$44.24	\$21.62	48.87%	17.00%	1.659	\$73.38
<b>Professional / Technical</b>	BLS ECEC, Private <b>Manufacturing industries</b> , “Professional and related”	\$38.94	\$19.58	50.28%	17.00%	1.673	\$65.14
<b>Clerical</b>	BLS ECEC, Private <b>Manufacturing industries</b> , “Office and Administrative Support”	\$17.82	\$8.97	50.34%	17.00%	1.673	\$29.82

<sup>a</sup> (BLS, 2013). <http://www.bls.gov/ncs/ect/sp/ecsphst.pdf>. Bureau of Labor Statistics, *Employer Costs for Employee Compensation – December 2006-March 2013*, "Table 2: Private Manufacturing Industry Workers, by occupational group, employer costs per hours worked for employee compensation and costs as a percentage of total compensation".

<sup>b</sup> An overhead rate of 17% was used based on assumptions in *Wage Rates for Economic Analyses of the Toxics Release Inventory Program* and the *Revised Economic Analysis for the Amended Inventory Update Rule: Final Report*.

**Exhibit 6.3. Agency Burden/Cost**

Activities	Hours per Labor Category		Labor Cost per Hour 1 <sup>a</sup>		Total Cost per Activity		Total Hours and Cost	
	Mgmt	Tech.	Mgmt	Tech.	Mgmt	Tech.	Hours per Activity	Cost per Activity
SDSI application form								
Distribute forms	7	23	\$77	\$57	\$539	\$1,311	30	\$1,850
Answer questions	7	23	\$77	\$57	\$539	\$1,311	30	\$1,850
Record / enter forms	10	30	\$77	\$57	\$770	\$1,710	40	\$2,480
Verify information; Make awards selection	12	38	\$77	\$57	\$924	\$2,166	50	\$3,090
Notify applicants of decision	3	9	\$77	\$57	\$231	\$513	12	\$744
<b>Total</b>	<b>39</b>	<b>123</b>	<b>--</b>	<b>--</b>	<b>\$3,003</b>	<b>\$7,011</b>	<b>162</b>	<b>\$10,014</b>

<sup>1a</sup> As seen in footnote 8, labor cost per hour is a loaded wage. The General Schedule hourly wage is inflated by an overhead factor of 1.60.

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

a. Respondent Tally

**Exhibit 6.4. Estimated Total Respondent Burden and Cost Summary**

Total Number of Respondents	Total Burden Hours	Total Labor Cost
42 (3 years)	420 (3 years)	\$24,696 <sup>a</sup> (3 years)
14 (annual)	140 (annual)	\$8,232 (annual)

<sup>a</sup>This ICR incurs no capital or OEM costs.

b. Agency Tally

**Exhibit 6.5. Average Estimated Agency Burden and Cost Summary**

Burden Hours	Total Labor Cost
162	\$10,014

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

There is no change in respondent burden from the information collection most recently approved by OMB.

**6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 10 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 numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

The Agency has established a public docket for this ICR under Docket ID No. EPA-HQ-OPPT-2012-0917, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in-person 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 WJC West Building, Room 3334, 1301 Constitution Ave., N.W., 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.

You may submit comments 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. Submit your comments, referencing Docket ID No. EPA-HQ- OPPT-2012-0917 and OMB Control No. 2070-0171, to (1) EPA online using [www.regulations.gov](http://www.regulations.gov) (our preferred method), or by mail to: Pollution Prevention and Toxics Docket, Environmental Protection Agency Docket Center (EPA/DC), Mailcode: 28221T, 1200 Pennsylvania Ave., N.W., Washington, DC 20460, and (2) OMB at [oir\\_submission@omb.eop.gov](mailto:oir_submission@omb.eop.gov).

## **ATTACHMENTS TO THE SUPPORTING STATEMENT**

Attachments to the supporting statement are available in the public docket established for this ICR under docket identification number EPA-HQ-OPPT-2012-0917. These attachments are available for online viewing at [www.regulations.gov](http://www.regulations.gov) or otherwise accessed as described in section 6(f) of the supporting statement.

**Attachment A:**        **42 USC 13103 - Pollution Prevention Act Section 6604.** Also available online at the US House of Representatives' Office of the Law Revision Counsel's [U.S. Code website](#)

**Attachment B:**        **EPA Form 6300-2 - SDSI Application Form**

**Attachment C:**        **Copy of Consultations Message Sent by EPA to Potential Respondents and Copy of Response to Consultations Message**