

Defense Reutilization and Marketing Service (DRMS) Form 1645, DRMS Form 2006, and  
Standard Form (SF) 114A  
SUPPORTING STATEMENT

A. Justification:

1. Need for the Information Collection

This is a request for OMB approval under the Paperwork Reduction Act for collection of data to be submitted by DoD representatives to assess the ability of prospective purchasers to comply with applicable laws and regulations before the DoD Components sell the materiel. The Defense Reutilization and Marketing Service (DRMS) Form 1645, "Statement of Intent," and Standard Form (SF) 114A, "Sale of Government Property – Item Bid Page – Sealed Bid," are used to identify the nature of the purchaser's business, where the materials will be stored, and what their intentions are with the materiel, i.e., use the materiel as intended, re-sell to others, scrap the materiel for recovery of contents, re-refine or reprocess the materiel. The forms are used to determine if the DRMS Form 2006, "Pre-Award/Post-Award On-site Review," will also be needed to determine if the purchaser is capable of meeting environmental and hazardous material handling responsibilities. DoD Components complete the DRMS Form 2006 to determine whether the prospective purchaser meets the responsibility criteria in part 102 of Title 41, Code of Federal Regulations before the DoD Components can make an award of hazardous and dangerous property. The information is provided by the sales customer who is submitting a bid for materiel.

2. Use of the Information

The information is used by the Defense Logistics Agency (DLA) Disposition Services, Defense Contract Management Agency (DCMA), and the Military Services for transfers of hazardous and dangerous property to parties outside DoD control. All individuals or businesses that are attempting to purchase DoD property must submit a DRMS Form 1645 and have a SF114A. The information on the forms serves as a type of bid for DoD property and to ensure recipient's eligibility to conduct business with the government. All individuals or businesses that are attempting to purchase DoD property identified as hazardous and dangerous property must have a DLA Disposition Services representative complete a DRMS Form 2006. This form is used to ensure recipient's eligibility to conduct business with the government. The site survey is performed for the purpose of physically assessing the purchaser's destination facilities and the operation thereof, including competency regarding the management of hazardous property, capacity, storage, processing, use, and transportation.

3. Use of Information Technology

For those individuals or firms who have the capability to access the Internet, they have the option of either downloading and mailing the DRMS Form 2006, DRMS Form 1645 or SF 114A or, submitting the form electronically.

4. Non-Duplication

There is no duplication. This information is not available through any other means.

5. Burden on Small Business

There is no significant impact on small businesses. All recipients of this kind of property undergo a clearance check before the property is transferred. References to record-keeping pertain to those records that a recipient uses and maintains in the normal course of business.

6. Consequences of Not Collecting

The forms described in this information collection request will be used to collect information needed to facilitate appropriate clearance checks. Release of DoD property without these clearance checks poses a risk to national security, because individuals and countries, whose interests are counter to those of the United States, target property for their military utility and value. These concerns were established as a result of Congressional hearings, numerous investigations and seizures conducted by the U.S. Customs Service, Federal Bureau of Investigation, Defense Criminal Investigative Service and U.S. Attorney's General task forces. These forms address Congressional, General Accounting Office, and DoD Inspector General findings.

7. Paperwork Reduction Act Guidelines

There are no special circumstances. This collection is consistent with 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

On December 29, 2014, the Department of Defense published an interim final rule titled "Defense Materiel Disposition" (79 FR 78144-78218). The 60-day public-comment period expired on February 27, 2015. Two public comments were received. One of the comments expressed praise and support for the Defense Materiel Disposition program. The second comment expressed concern about the provision of excess Department of Defense property to law enforcement agencies. Response: The congressionally authorized 1033 program provides property that is excess to the needs of the Department of Defense for use by agencies in law enforcement, counter-drug, and counter-terrorism activities. It enables first responders and others to ensure the public's safety and to save lives.

The Department is co-chairing the Law Enforcement Equipment Working Group established by executive order on January 16, 2015. The purpose of the working group is to identify agency actions that can improve Federal support for the acquisition of controlled equipment by law enforcement agencies (LEAs), including by providing LEAs with controlled equipment that is appropriate to the needs of their community; ensuring that LEAs are properly trained to employ the controlled equipment they acquire; ensuring that LEAs adopt organizational and operational practices and standards that prevent the misuse or abuse of controlled equipment; and ensuring LEA compliance with civil rights requirements resulting from receipt of Federal financial assistance.

9. Gifts or Payment

No payments or gift will be provided to the respondents.

10. Confidentiality

Information will be protected to the extent permitted by law.

11. Sensitive Questions

These forms require recipients to provide, among other things, certain personal information, as well as, the name and address of their business, what they intend to do with the property, that they are not debarred or prohibited from doing business with the government, and that they will comply with federal regulations and laws regarding use, transfers, and exports. In addition, the forms require that the corporate officers, directors, partners or agents separately provide similar personal information.

12. Estimates of Respondent Burden and Annual Costs

The burden to respondent consists of allowing a DLA Disposition Services Environmental Protection Specialist (EPS) to perform the Pre-Award/Post-Award survey while the EPS completes the form. The burden to respondent for the DRMS Form 1645 and SF 114A consists of filling out a statement of intent to be included with their bid to purchase government property. DLA estimates approximately 72 DRMS 2006 forms, 72 DRMS 1645 forms, and 45 SF 114A forms are completed per year.

a. Respondent Burden for DRMS Form 1645.

Number of respondents	72
Responses pre respondent	1
Total Annual Responses	72
Hours per DRMS Form 1645	1.5 hours
Annual Burden	108 hours
(72 annual responses x 1.5/hours = 108 hours)	

b. Estimated cost to the respondents for DRMS Form 1645.

Total annual burden	108 Hours
Average hourly cost	\$25/hr.
Total annual cost to respondent:	\$2,700
(108 hours x \$25/hour = \$2,700)	

c. Respondent Burden for SF 114A.

Number of respondents	45
Responses pre respondent	1
Total Annual Responses	45
Hours per SF 114	.75 hours
Annual Burden	33.75 hours

(45 annual responses x .75/hours = 33.75hours)

d. Estimated cost to the respondents for SF 114A.

Total annual burden	34 Hours
Average hourly cost	\$25/hr.
Total annual cost to respondent:	\$843.75
(33.75 hours x \$25/hour = \$843.75)	

e. Respondent Burden for the DRMS Form 2006.

Number of respondents	72
Responses pre respondent	1
Total Annual Responses	72
Hours per site survey	1.25 hours
Annual Burden	90 hours
(72 annual responses x 1.25/hours = 90 hours)	

f. Estimated cost to the respondents for the DRMS Form 2006.

Total annual burden	90 Hours
Average hourly cost	\$25/hr.
Total annual cost to respondent:	\$2,250
(90 hours x \$25/hour = \$2,250)	

g. TOTALS:

Total Respondents:	189
Average Burden per Response:	1.25 hours
Total Annual Burden Hours:	236.25 hours
(189 respondents x 1.25/hours = 236.25 hours)	
Total Labor Costs:	\$5,906.25
(236.25 hours x \$25/hour=\$5,906.25)	

13. Estimated Respondent Costs Other Than Burden Hour Costs

None. We estimate there are no capital and start-up costs and no operation and maintenance components.

14. Estimated Annual Cost to the Federal Government

Costs to the Government include costs for the Environmental Protection Specialist (EPS) to travel to the Purchasers Facility, Time to fill out paperwork, and Time to complete the survey.

Cost to process DRMS Form 1645	
GS-12, 1 employee, 36 hours/annual @ \$33.30 =	\$1,198.80
<u>Total Estimated Cost for DRMS Form 1645:</u>	<u>\$1,198.80</u>

Cost to process SF 114A  
GS-12, 1 employee, 18 hours/annual @ \$33.30 = \$599.40  
Total Estimated Cost for SF 114A: \$599.40

Transportation Costs for DRMS Form 2006: \$1,680.00  
One GS-12, traveling 2.0 hour @ \$33.30 x 72 times/year = \$4,795.20  
Traveling 100 miles/24miles per gallon x 72 times/year x \$3.50 gallon fuel = \$1,050  
Sub Total for DRMS Form 2006: \$4,795.20 + \$1,050 + \$1,680 = \$7,525.20

Cost to process DRMS Form 2006  
GS-12, 1 employee, 90 hours/annual @ \$33.30 = \$2,997  
Total Estimated Cost for DRMS Form 2006: \$7,525.20 + \$2,997 = \$10,522.20.

TOTAL COST TO GOVERNMENT: \$1,198.80 + \$599.40 + \$10,522.20 = \$12,320.40

15. Reasons to Change in Burden

This is a collection in existence without approval. The burden associated with this is new inventory for DoD.

16. Publication of Results

This information is not for publication.

17. Non-Display of OMB Expiration Date

This approval is not being sought.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

No exceptions.