

**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.: 2415.03

OMB Control No.: 2070-0188

1(b) Short Characterization

This information collection request (ICR) seeks renewed approval for EPA to offer voluntary participation in 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 partnership program that encourages the use of integrated pest management (IPM) strategies to reduce pests and pesticide risks. IPM is an approach that involves making the best choices from among a series of pest management practices that are both economical and pose the least possible hazard to people, property, and the environment.

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 IPM implementation or education. The program encourages PESP members to track progress towards IPM goals such as: reductions in unnecessary use of pesticides, cost reductions, and knowledge shared about IPM methodologies. Entities participating in PESP also benefit from technical assistance, and through incentives for achievements at different levels.

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 progressively higher membership tiers (bronze, silver, and gold) based on sustained reduction of pesticide risks and an independent measure of IPM implementation.² The data needed to qualify is collected through the annual PESP reports. In addition, annual progress reports (also referred to as 'surveys' in the 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 environment. **Attachment A** is a flow chart that demonstrates PESP membership level advancement process.

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

² PESP Member Performance Measures website details how members can receive recognition for their achievements by qualifying for Bronze, Silver, and Gold tiers: <https://www.epa.gov/pestp/membership-eligibility-and-performance-measures-pestp#performance>

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

PESP is EPA's non-regulatory approach to meeting the goals of the Pollution Prevention Act (PPA), the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and the Food Quality Protection Act (FQPA) to reduce pesticide risks in agricultural and non-agricultural settings. Section 2(b) of the PPA 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" (**Attachment B-1**).

Section 3 of FIFRA requires EPA to regulate pesticides to prevent "unreasonable adverse effects" on human health and the environment (**Attachment B-2**). IPM strategies, such as decreasing pesticide use and targeted pesticide treatment, reduce the likelihood of pesticides causing unreasonable adverse effects. 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 B-3**).

EPA collects information about PESP member accomplishments and measures 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 progress in adopting IPM, and the resulting reductions in risks to human health and the environment.

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 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 PESP website (<http://www.epa.gov/pestwise/pepsp>).

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 PESP does not exist elsewhere.

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

Pursuant to 5 CFR 1320.8(d), in proposing to renew this ICR, EPA published a Federal Register notice (81 FR 15105, March 21, 2016) announcing this proposed information collection activity and provided a 60-day public comment period. No comments were received.

3(c) Consultations

As required under 5 CFR 1320.8(d)(1), in addition to the public notice that EPA published in the Federal Register concerning the renewal of this ICR, the Agency contacted the following stakeholders to seek feedback on the burden estimates in this ICR, and on the clarity of the information collection process (see **Attachments C & D** for the consultations questions and stakeholders' responses, respectively):

1. *Gabrielle Sakolsky*,
Entomologist Assistant Superintendent:

Cape Cod Mosquito Control Project
259 Willow Street, Suite 3
Yarmouth Port, MA 02675
508-775-1510
2. *Wayne C. Golden*,
Assistant Vice President,
Government Relations:

Rollins, Inc.
Rollins Support Center
2170 Piedmont Road NE
Atlanta, GA 30324
(O) 404-888-2146
wgolden@rollins.com
3. *Nicholas Halbach*

San Lorenzo Veterinary Hospital
17500 Hesperian Blvd
San Lorenzo, CA 94580
510-276-7234

Cape Cod Mosquito Control Project and Rollins Support Center provided responses. While neither respondent disagreed with the burden estimates, comments by Cape Cod Mosquito Control suggest that the Agency's estimates for the National IPM User stakeholder category in Table 4 of this ICR may represent the upper bound of the paperwork burden. EPA has not made

changes to the burden estimates.

The feedback provided by Rollins, Inc. about the Pesticide Environmental Stewardship Program (PESP) Strategy / Progress Reporting offers insights into information gathering from the perspective of a larger company. EPA has yet to collect data using this form, and cannot determine if other PESP members will have similar experiences providing the requested information. The Agency has also taken into account that Rollins, Inc. is a very large company and reporting on each pest management account may present challenges. As PESP members include pest management firms of varying size, small to mid-size firms may find it easier to report. During the next ICR renewal cycle, EPA will review in detail all PESP member responses, re-evaluate the strength, clarity, and validity of the survey instrument, and propose adjustments, as needed.

3(d) Effects of Less Frequent Collection

EPA requests that PESP members each submit an annual progress report on certain environmental performance measures. EPA estimates that it will take the Agency one year to develop a good understanding of each member's progress over time. The Agency also believes that less frequent reporting would place a greater burden on members. This is because PESP members would then have to track their pesticide usage and other data over a longer period of time, and compile a larger overall report to EPA. It would also delay recognition of members' accomplishments, potentially excluding them from qualifying for 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 progress reports will be submitted annually. PESP members will not need to retain records for this program for more than one year.

3(f) Confidentiality

EPA has implemented procedures to protect any confidential, trade secret or proprietary information from disclosure by providing strict instructions regarding access to 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. Members can also be companies or organizations that promote the use of IPM through education and training.

The stewardship program 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:

1. The PESP Membership Application Form (EPA Form 9600-02, **Attachment E**), and
2. A list of one of IPM measures that the member has selected to commit to and track over time using one of the following two PESP Strategy/Progress Reporting forms, as applicable:
 - Non-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 F**);
 - Commercial/Residential Pest Control companies use the Strategy/Progress Reporting Form for Residential/Commercial Pest Control Service Providers (EPA Form No. 9600-03, **ATTACHMENT G**).

PESP Strategy/Progress Reporting Forms are multi-purposed. Members use whichever form applies to them (either **ATTACHMENT F** or **G**) 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. PESP strategy process keeps all 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 Champion* 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 Handbook³, PESP website)
- Select a primary and secondary contact person for the program
- Complete 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 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 PESP Website, or by fax, mail, or e-mail

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 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 PESP Membership Application Form to potential members, and maintain an

³ Pesticide Environmental Stewardship Program: Member Handbook (April, 2011)
<https://www.epa.gov/sites/production/files/2016-01/documents/pesp-handbook.pdf>

- online and downloadable (PDF) version of the form on 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 by checking EPA's databases both at headquarters and the regional offices.

5(b) Collection Methodology and Management

Prospective members will be able to obtain 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 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 a 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 the Agency already maintain this information.

3. Provide growers 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. The Agency has designed its forms to minimize respondent burden while obtaining sufficient and accurate information. PESP is a flexible program, particularly with regard to the 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 Strategy/Progress Reporting Form having to do with pesticide use. Likewise, some members will elect to not address every point in 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 participation 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. The progress reports are due to the Agency by October 1st of each year.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

The PESP participation paperwork burden consists primarily of the administrative activities associated with filling in and submitting a Membership Application, preparing and submitting a strategy (using PESP Strategy/Progress Reporting Form), as well as preparing and submitting an annual progress report (using PESP Strategy/Progress Reporting Form). Only new members fill out and submit the Membership Application, and this is a one-time activity. All members prepare and submit an annual progress report using 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 2 through 4, EPA estimates the paperwork burden to prepare and submit the five-year strategy (using the applicable PESP Strategy/Progress Reporting Form) to be 10 managerial hours; the burden to prepare and submit 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. This activity also represents the majority of burden hours for all types of members. The total annual burden hours to prepare and submit the annual progress report (or annual survey) are 25, 100, and 300 for IPM promoters, IPM users, and national IPM users respectively, as shown in Table 1 below. 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.

Table 1: Total Burden Hours for Submitting Annual PESP Surveys

	Management 20%	Technical 70%	Clerical 10%	Total Hours
IPM Promoters	5	17.5	2.5	25
IPM Users	20	70	10	100
National IPM Users	60	210	30	300

As shown below in Table 5, EPA estimates that an average of 419 entities will participate in PESP per year during the next three year ICR period. That estimate is based on the current number of existing members and average number of new members joining during the last three years. As of January 2016, PESP had 396 existing members. On average, 23 new members joined each year during the previous three years in all membership categories, combined. The number 419 assumes that each year, for the next three years, 23 new members will join. Based on existing PESP data, 109 members are IPM promoters, 224 are IPM users, and 64 are national IPM users. EPA estimates an average of 47,665 annual hours for all members at a cost of \$3.13 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.

Unloaded Wage Rate: Wages are estimated for occupations (management, technical, and clerical) within applicable sectors. The Agency updated this final version of the ICR using the average wage data for 20152015 (published in May, 2016). This data is available 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 46% 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 20152015 data and to derive the fully loaded rates and overhead costs for this new ICR are listed in **Attachment H**. Tables 2, 3, and 4 below provide member burden and cost estimates by activity for IPM promoters, IPM users, and national IPM users, respectively.

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

Collection Activities per Promoter	Burden Hours			Total	
	Management	Technical	Clerical	Hours	Costs
	\$153.32 per hour	\$78.94 per hour	\$42.43 per hour		
Activities for current participants					
Prepare and submit PESP strategy	2	0	0	2	\$307
Prepare and submit PESP annual Survey	5	17.5	2.5	25	\$2,254
TOTAL BURDEN	7	17.5	2.5	27	\$2,561
Activities for new participants					
Fill out and submit application form	2	0	0	2	\$307
Prepare and submit PESP strategy	10	0	0	10	\$1,533
Plan, prepare, and setup for annual PESP surveys	5	17.5	2.5	25	\$2,254
TOTAL BURDEN	17	17.5	2.5	37	\$4,094
Current participants	108				
Participants joining per year	1				
All Promoters	Existing participants	Hours per participant	Total hours	Cost per participant	Total cost
Current participants - 3 years average	109	27	2,934	\$2,561	\$278,269
New participants per year	1	37	25	\$4,094	\$2,729
Total - 3 year average	109		2,959		\$280,999

Data Source: BLS http://www.bls.gov/oes/current/naics4_541600.htm, May 2015 data
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 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 IPM Users

Collection Activities per IPM User	Burden Hours			Total	
	Management	1st Line Supervisor	Clerical	Hours	Costs
	\$98.78 per hour	\$53.95 per hour	\$33.16 per hour		
Activities for current participants					
Prepare and submit PESP strategy	2		0	2	\$198
Prepare and submit PESP annual Survey	20	70	10	100	\$6,084
TOTAL BURDEN	22	70	10	102	\$6,281
Activities for new participants					
Fill out and submit application form	2		0	2	\$198
Prepare and submit PESP strategy	10		0	10	\$988
Plan, prepare, and setup for annual PESP surveys	20	70	10	100	\$6,084
TOTAL BURDEN	32	70	10	112	\$7,269
Current participants	203				
Participants joining per year	21				
All IPM Users	Existing participants	Hours per participant	Total hours	Cost per participant	Total cost
Current participants - 3 years average	224	102	22,882	\$6,281	\$1,409,080
New participants per year	21	112	2,389	\$7,269	\$155,073
Total - 3 year average	246		25,271		\$1,564,152

Data Source: BLS http://www.bls.gov/oes/current/naics5_561710.htm, May 2015 data

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 PESP survey during the first year. After the first year current members submit the annual PESP survey.

*Estimates may not add due to rounding, $224.3 + 21.3 = 245.7$

Table 4: Average Annual Burden and Cost Estimates for National IPM Users.

Collection Activities per National IPM User	Burden Hours			Total	
	Management	Technical	Clerical	Hours	Costs
	\$116.74	\$55.04	\$37.17		
	per hour	per hour	per hour		
Activities for current participants					
Prepare and submit PESP strategy	2	-	-	2	\$233
Prepare and submit PESP annual Survey	60	210	30	300	\$19,679
TOTAL BURDEN	62	210	30	302	\$19,912
Activities for new participants					
Fill out and submit application form	2	-	-	2	\$233
Prepare and submit PESP strategy	10	-	-	10	\$1,167
Plan, prepare, and setup for annual PESP surveys	60	210	30	300	\$19,679
TOTAL BURDEN	72	210	30	312	\$21,080
Current participants	63				
Participants joining per year	1				
All National IPM Users	Existing participants	Hours per participant	Total hours	Cost per participant	Total cost
Current participants - 3 years average	64	302	19,227	\$19,912	\$1,267,745
New participants per year	1	312	208	\$21,080	\$14,053
Total - 3 year average	64		19,435		\$1,281,798

Data Source: BLS http://www.bls.gov/oes/current/naics3_311000.htm, May 2015 data
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 PESP survey during the first year. After the first year current members submit the annual PESP survey.

Table 5 summarizes the number of members and the average annual burden and cost over a three year period for both existing and new members.

Table 5: Three-year Average Total Annual Burden Hours and Cost for all Members

	Members	Total hours	Total cost
IPM Promoters	109	2,959	\$280,999
IPM Users	246	25,271	\$1,564,152
National IPM Users	64	19,435	\$1,281,798
All Members	419	47,665	\$3,126,949

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

Table 6: 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	0.00	0.00	0.00	0.00	0.00	0.00	0.63	0.63	1,310	\$124.89	\$164
Technical	0.01	0.00	0.00	0.01	0.00	0.00	5.69	5.71	11,884	\$81.37	\$967
Clerical	0.00	0.00	0.00	0.00	0.00	0.00	0.25	0.25	523	\$46.41	\$24
Total	0.02	0.00	0.00	0.01	0.00	0.00	6.56	6.59	13,717		\$1,155

Annual Agency burden hours, 13,717, were calculated by multiplying the number of hours per FTE (2,080) by the number of FTE's (6.59). The annual Agency costs, \$1.15 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 2015 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 7: Total Annual Burden and Cost Summary

	Total hours	Total cost
Respondents		
IPM Promoters	2,959	\$280,999
IPM Users	25,271	\$1,564,152
National IPM Users	19,435	\$1,281,798
Total	47,665	\$3,126,949
Agency		
Total	13,717	\$1,154,906

6(e) Reasons For Changes in Burden

There is an increase of 4,642 hours in the total estimated respondent burden compared with that identified in the ICR currently approved by OMB. This increase reflects EPA's updating of burden estimates for this collection based upon historical information on the number of PESP members. Members are classified as IMP Promoters, IMP Users, and National IMP Users. Based on revised estimates, the number of IMP Promoters has decreased, while the number of IMP users has increased, and the number of National IMP users has not changed since the last ICR renewal. Although the estimated burden per response has not changed for any category, the shift in membership types has resulted in a net increase in the overall burden. This change is an adjustment

6(f) Burden Statement

The annual respondent burden for this ICR is estimated to average 47,665 hours (2,959 for IPM promoters, 25,271 hours for IPM users, and 19,435 hours for national IPM users). This includes time to fill out and submit PESP Membership Application, prepare and submit PESP strategy, and plan, setup, prepare and submit the annual PESP progress report.

According to the Paperwork Reduction Act, "burden" means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose, or provide

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information to or for a Federal agency. For this collection, it is the time reading the regulations, planning the necessary data collection activities, analyzing data, generating reports and completing other required paperwork, and storing, filing, and maintaining the data. The agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control number for this information collection appears at the beginning and end of this document. In addition OMB control numbers for EPA's regulations, after initial display in the final rule, are listed in 40 CFR Part 9.

The Agency has established a public docket for this ICR under Docket ID No. EPA-HQ-OPP-2016-0078, which is available for online viewing at <http://www.regulations.gov>, or in person viewing at EPA Docket Center Public Reading Room, William Jefferson Clinton West Building, Room 3334, 1301 Constitution Avenue, NW, Washington, DC 20004. EPA Docket Center is open from 8:30 a.m. to 4 p.m., Monday through Friday, excluding federal holidays. The docket center telephone number is (202) 566-1744.

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. 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-2016-07078 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-2016-0078.

ATTACHMENT A: PESP Membership Levels Flow Chart

ATTACHMENT B-1: 42 USC 133 Pollution Prevention Act of 1990, available at <http://www.gpo.gov/fdsys/pkg/USCODE-2009-title42/pdf/USCODE-2009-title42-chap133.pdf>

ATTACHMENT B-2: 7 USC 136a_Registration of Pesticides

ATTACHMENT B-3: 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 C: Consultations: List of Standard Questions

ATTACHMENT D: Consultations: Industry Responses

ATTACHMENT E: PESP Membership Application (EPA Form No. 9600-02)

ATTACHMENT F: Strategy/Reporting Form for PESP Members that are Not Commercial/Residential Pest Control Services (EPA Form No. 9600-01).

ATTACHMENT G: PESP Strategy/Progress Reporting Form for Residential/Commercial Pest Control Service Providers (EPA Form No. 9600-03)

ATTACHMENT H: Worksheets Used to Calculate Labor Costs for IPM Promoters, IPM Users, National IPM Users, and EPA