

**Record of Consultations between the U.S. Environmental Protection Agency and
Respondents to the Information Collection Request:
“Pesticide Environmental Stewardship Program Annual Measures Reporting”**

I. List of Stakeholders Who Agreed to Participate in the Consultations

A. **Gabrielle Sakolsky**
*Assistant Superintendent,
Entomologist :*

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B. **Wayne C. Golden**
*Assistant Vice President,
Government Relations:*

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Rollins Support Center
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C. **Nicholas Halbach**

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II. Consultations Responses

A. Responses from Cape Cod Mosquito Control Project:

(1) Publicly Available Data

§ Is the data that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency?

No, some of the information is available at the state or local level but this is the only national survey.

§ If yes, where can you find the data? (Does your answer indicate a true duplication, or does the input indicate that certain data elements are available, but that they don=t meet our data needs very well?)

(2) Frequency of Collection

§ Can the Agency collect the information less frequently and still produce the same outcome?

No, due to the changing nature of mosquito-borne disease and mosquito control techniques an annual update is appropriate.

(3) Clarity of Instructions

§ The ICR is intended to require that respondents provide certain data so that the Agency can utilize them.

§ Based on the instructions (regulations, PR Notices, etc.), is it clear what you are required to do and how to submit such data? If not, what suggestions do you have to clarify the instructions?

§ Yes. Currently, we are unable to use forms and submit an annual written report. We rely on feedback from our liaison if more information is required.

§ Do you understand that you are required to maintain records?

§ Yes.

§ Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical and easy to complete?

§ We use a past report for our format, but it is difficult to know what might be meaningful to the EPA.

§ Are there forms associated with this process? Do you use them? Are they clear, logical, and easy to complete?

§ Not at this time. We have developed forms for our members to complete when compiling the data.

(4) Electronic Reporting and Record keeping

The Government Paperwork Elimination Act requires agencies make available to the public electronic reporting alternatives to paper-based submissions by 2003, unless there is a strong reason for not doing so. One such reason is that, at the present time, the Agency is unable to ensure the security of CBI that might be transmitted over the Internet.

§ What do you think about electronic alternatives to paper-based records and data submissions? Current electronic reporting alternatives include the use of web forms/XML based submissions via the Agency's Internet site and magnetic media-based submissions, e.g., diskette, CD-ROM, etc. Would you be interested in pursuing electronic reporting?

§

§ Yes

§

§ Are you keeping your records electronically? If yes, in what format?

Yes, in an Excel spreadsheets and Access database.

Although the Agency does not offer an electronic reporting option because of CBI-related security concerns at this time,

§ would you be more inclined to submit CBI on diskette (CD or DVD) than on paper?

Yes. This would simplify the process. Currently we are sending reports as an attachment to an email.

§

§ what benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information?

Reporting would be straight- orward and standardized across the membership.

(5) Burden and Costs

§ Are the labor rates accurate? ??

§ The Agency assumes there is no capital cost associated with this activity. Is that correct?

Yes, to date.

§ Bearing in mind that the burden and cost estimates include only burden hours and costs associated with the paperwork involved with this ICR, e.g., the ICR does not include estimated burden hours and costs for conducting studies, are the estimated burden hours and labor rates accurate? If you provide burden and cost estimates that are substantially different from EPA's, please provide an explanation of how you arrived at your estimates.

I have not seen estimates, but it takes our members time to compile their data for our annual survey and then it takes me about one day to put everything together for submission.

§ Are there other costs that should be accounted for that may have been missed?

B. Responses from Rollins, Inc.

From: [Negash, Lily](#)
To: [Tanner, Lee](#)
Subject: Consultations Responses from Rollins, Inc.
Date: Wednesday, August 10, 2016 6:06:00 PM
Attachments: [image001.png](#)
[image002.png](#)

Hi Lee,

This response from Rollins, Inc., below will be posted to the docket in PDF format.

Lily G. Negash

Coordinator: GHS, NEPA

U.S. Environmental Protection Agency

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From: Kim Kelley Tunis [<mailto:kkelley@rollins.com>]
Sent: Tuesday, July 26, 2016 3:41 PM
To: Tanner, Lee <Tanner.Lee@epa.gov>
Cc: Wayne Golden <wgolden@rollins.com>
Subject: FW: 30 days to complete the PESP Survey - White House Renewal - Can you help?

Lee,

Please see my responses below. Please, let me know if you have any questions or would like to discuss further.

Thanks!

Kim

Kim Kelley-Tunis | Director, Quality Assurance and Claims
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Please consider the environment before printing this email.

From: Kim Kelley Tunis
Sent: Monday, May 02, 2016 3:38 PM
To: Wayne Golden
Subject: RE: 30 days to complete the PESP Survey - White House Renewal - Can you help?

Wayne,

Below are my notes regarding the documents you provided. I know that this is very wordy, but I wanted to be thorough. I understand what the purpose of these documents are, but quantifying IPM through product application rates and customer service records is only capturing a small piece of the picture. The other problem, technology has not caught up with the industry, allowing us to capture the specifics of any given service. With that being said, some of the information that they are requesting for collection may be incredibly difficult to collect, especially for larger companies with multiple locations.

Document 2016_ICR_PESP_Supplement_Draft:

- First page – environmental should be corrected to say environment
- First page, last two sentences - IPM is defined as a more economical method for pest control. As we know, that is not the case. It also states that IPM results in the least hazardous control methods, this too is not always accurate. They may want to look up the formal definition of IPM and go with a more clinical definition that is void of opinion
- Page 2, second paragraph – the last sentence implies that reduced pesticide use will reduce all risks in both agricultural and non-agricultural settings. They may want to be more clear as to the types of risks (pesticide exposure)
- There are also several areas within the document that should be rewritten to provide greater clarity on the objectives and scope of the program

Document EPA-HQ-OPP-2016-0078-003 (PESP Strategy / Progress Reporting Form)

Some of the information required for submission may be difficult to provide by larger companies and requires greater clarification

- Organizational Profile Measures
 - Total Accounts under Management
 - Should these accounts be broken out by service type – Residential, Commercial, or both
 - Depending upon which account types, this number could greatly skew the data
 - Does this number only represent number of active accounts at time of reporting – one-time service or ongoing service
 - Total Service Calls
 - This goes back to the previous bullet point of one-time or ongoing service – These numbers may be vastly different at the time of reporting if a company is only reporting ongoing service
- Measures Reporting – Organizational Profile Measures
 - Total acres under IPM
 - If a company is following an IPM program, all locations serviced would need to be measured. This information is rarely collected, and when it is, it is

- primarily for larger commercial accounts. The total number of acres treated would only really be relevant in an agricultural setting or if lawn care is the primary control method being practiced. This would not be a big issue for commercial pest control companies that are limited in their exterior treatment within 6' of the immediate perimeter of the structure
- Total accounts under IPM
 - Unless IPM has a different definition with the PESP program, this number should be the same as the Total Accounts Managed
 - Total Service Call-backs
 - Need greater clarity as to what type of account is being serviced to determine which calls constitute a call-back
 - Total Non-Chemical Treatments only
 - This may be extremely difficult to quantify since all customer visits generate a service ticket. This particular piece of data may only be able to be quantified by reviewing every ticket that has been completed to determine whether a product was used during the service
 - Use of Spot Treatments
 - This may be a question that can be omitted. Based on most label's current language, the majority of applications made are either going to be a spot or crack and crevice application
 - Formal sanitation / housekeeping protocols in place?
 - This should be changed to read that "Customer provided with pest specific sanitation / housekeeping protocols." How do you ask a residential customer to implement a formal sanitation protocol?
 - Pesticide Risk Reduction and Usage
 - Total amount of pesticides applied or purchased
 - Purchasing numbers are probably easier for a larger company to provide. However, providing the complete list of products purchased may also become somewhat cumbersome, especially when you start pulling in all one-time purchases that may be very situational
 - Total service calls using Biopesticides
 - It may be best to rely on the purchase data provided above, and just identify which of the products are biopesticides. Identifying which accounts have had a service utilizing biopesticides may be extremely difficult
 - Total service calls using no pesticides
 - This, in some regards is a duplicate of the question within "Measures Reporting – Organizational Profile Measures". What is the definition of pesticide? Does the application of a 25b product fall within this category or the previous?
 - Measures Reporting – IPM / PESP Education and Reporting
 - In general, providing the numbers requested in the survey is doable, but difficult for

larger companies. It is relatively easy to provide those hours where training events are provided by the “corporate” office. But when training opportunities are provided on the local level, this becomes very difficult to quantify. This is also the case for training provided to customers. It becomes very difficult to provide a number to all those customers that have received training.

- Total customers following IPM guidance
 - This is a very subjective number. When things within an account are going well, respondents will say their participation is 100%, but when things are going poorly, compliance will be 0%. ☺

Kim Kelley-Tunis
Director, Quality Assurance and Claims
Rollins