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

EPA's Safer Choice Product Recognition Program

ICR Numbers: EPA ICR No. 2302.03 OMB Control No. 2070-0178

1(b) Short Characterization / Abstract

This information collection request (ICR) addresses the submission of applications to EPA for recognition under the Safer Choice Product Recognition Program (Safer Choice program), formerly known as the Design for the Environment Program. The Safer Choice program recognizes products where all ingredients meet EPA's stringent requirements for human health and the environment as found in the Safer Choice Standard. Under the encouragement of the current program, leading companies have already made great progress in developing safer, highly effective chemical products. Since the program's inception in 1997, formulators have been using the program as a portal to OPPT's unique chemical expertise, information resources, and guidance on greener chemistry. Safer Choice partners enjoy Agency recognition, including the use of the Safer Choice label on qualifying products. This ICR would enable Safer Choice to accommodate participation by more than nine formulators each year, enhance program transparency, and further promote chemical safety.

Safer Choice participates in the development of CleanGredients™, a database of safer cleaning product ingredients, which identifies safer formulations and makes forming partnerships easier. Organized by product functional use class (e.g., surfactants, solvents, etc.), CleanGredients™ facilitates a green marketplace where formulators can select functionally appropriate and safer ingredients.

The redesign of chemical products offers opportunities to:

- Remove hazardous chemicals from formulations before they can enter the workplace, home, or environment.
- Advance energy and water efficiency, resource conservation, and innovative technologies.
- Qualify for environmentally preferred product status, increasingly sought by government, retailer and consumer purchasers.

Companies formulate products from a broad range of chemicals with a variety of applications. The Safer Choice program labels cleaning and other chemical-based products such as dish detergents, laundry detergents, hand soaps, and all-purpose cleaners for consumer and industrial use. Cleaning products make up the majority of partnership products, and cleaning product manufacturers have the greatest demand for program participation by potential partners. Third-party profilers review all product applications prior to Safer Choice submission.

The review team carefully reviews each product component. A literature review, and when appropriate, structural activity relationships, are used to understand each chemical's health and

environmental characteristics. The review includes all chemicals, including those in proprietary raw material blends, which ingredient suppliers share with Safer Choice and the third-party profilers in confidentiality. The review team then compares an ingredient's characteristics to other chemicals in the same use class, considers possible negative synergies between ingredients, and places the ingredient on a continuum of improvement relative to other similar chemicals. By means of its review team and methodology, Safer Choice provides information to formulators that helps them select from among the safest chemicals in an ingredient class. Only formulations containing exclusively safer ingredients are recognized by Safer Choice.

12. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

Authority for the Safer Choice program derives from Section 6604(b)(5) of the Pollution Prevention Act (PPA), 42 U.S.C. 13103(b)(5) (see Attachment A), which directs EPA to facilitate the adoption of source-reduction techniques by businesses, and the Toxic Substances Control Act (15 U.S.C. 2601 et seq.), which encourages safety in technological innovation in chemistry. In recognition of this statutory directive, and through consultation with a broad range of stakeholders, EPA developed the Safer Choice program.

Safer Choice program 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 chemical products. In turn, the Safer Choice program will help businesses meet 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.[1] It is not surprising then that EPA has heard from many organizations that Safer Choice program partnership is an important impetus for prioritizing and completing the transition to safer chemical products. The Safer Choice program is also needed to promote greater use of safer chemical products by companies unaware of the benefits of such a change.

Safer Choice has carefully tailored its request for information, and especially the Safer Choice program application forms, to ensure that it only asks for information essential to verifying applicants' eligibility for recognition.

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

The information collected by the Safer Choice program is not designed or intended to support regulatory decision-making by EPA. EPA uses the information collected in the Safer Choice program application to: (1) review products and their components; (2) complete chemical profiles for each product component to determine its key health and environmental characteristics; and (3) establish a partnership agreement with the company outlining how the company and EPA/Safer Choice will work together to continually improve the health and environmental profile of the product(s).

[1] "Green to Gold: How Smart Companies use environmental strategy to innovate, create value, and build competitive advantage" by Daniel Esty and Andrew Winston, Yale University Press, New Haven, 2006

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 Safer Choice program is unique and is not duplicative of previous information collection requests. As due diligence, EPA also checked with trade associations and potential partners to confirm that the information being collected by the Safer Choice program does not exist elsewhere.

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

EPA provided a 60-day public notice and comment period that ended on May 9, 2016 (81 FR 12097, March 8, 2016). EPA received no comments during the comment period.

1 3(c) Consultations

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 three parties via e-mail. The individuals contacted were:

Kathleen Stanton, Director
Technical and Regulatory Affairs
American Cleaning Institute
KStanton@cleaninginstitute.org

Beth L. Law, Assistant General Counsel
Vice President, Stewardship & Sustainability
Consumer Specialty Products Association
BLaw@cspa.org

Bill Balek, Director
Legislative & Environmental Services
ISSA - The Worldwide Cleaning Industry Association
bill@issa.com

EPA received no responses to its solicitation for consultations. A copy of EPA's consultation e-mail to the above potential respondents is included in Attachment E.

1 3(d) Effects of Less Frequent Collection

Safer Choice program applications will be received on an ongoing basis over the three years covered by this ICR. The applications are designed to be one-time information submissions for organizations that wish to participate in the Safer Choice program, with the opportunity to renew the partnership agreement at the end of the three-year partnership period. This means that once every three years, the organization will submit a renewal application to confirm that no changes have been made to ingredients; this step is done in response to correspondence from Safer Choice that reminds organizations of the terms of their partnership agreements. Without this information collection

mechanism, Safer Choice will not have the ability to assist formulators in developing safer, highly effective chemical products or to formally recognize formulators who have successfully done so.

1 3(e) General Guidelines

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

1 3(f) Confidentiality

Some information collected by EPA under the Safer Choice program involves confidential business (CBI) or trade secret information. The Safer Choice program handles all information claimed as confidential business information in accordance with Agency confidentiality procedures (see 40 CFR part 2, subpart B). The Safer Choice program uses information provided by formulators solely for purposes related to forming the partnership and discloses the information only to EPA employees and EPA contractors cleared for confidential information with a specific need to know.

1 3(g) Sensitive Questions

The information collection activities does not involve any sensitive questions.

14. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and NAICS Codes

The Safer Choice program seeks partners from establishments engaged in the formulation of end-use, for-sale chemical products.

Below is a list of representative 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 the Safer Choice program. However, EPA expects that most applications will come from the following industries:

NAICS Code	Affected Industry
325510	Paint and Coating Manufacturing
325611	Soap and Other Detergent Manufacturing
325612	Polish and Other Sanitation Good Manufacturing
325910	Printing Ink Manufacturing
325992	Photographic Film, Paper, Plate, and Chemical Manufacturing
325998	All Other Miscellaneous Chemical Product and Preparation Manufacturing

4(b) Information Requested

Once a company with an interest in partnership with the Safer Choice program reviews the program materials and decides to apply, the next step for the organization is to submit the appropriate application.

(i) Data items:

Applicants for this voluntary program submit information items that vary depending upon the class of product. The items include:

Partnership Applications

Product manufacturers will submit ingredient information, as described here, through a cloud-based Salesforce system, to a qualified third-party profiler before submittal to EPA (see Attachment B).

Information submitted to third-party profilers:

- Company name and Web site URL;
- Number of employees;
- Company headquarters address and manufacturing address;
- Name, title, phone number, and e-mail address of the candidate's signatory contact person (e.g., CEO, or vice president for health and environment);
- Name, title, phone number, and e-mail address of candidate's technical contact person;
- Name, title, phone number, and e-mail address of candidate's marketing/outreach contact person;
- Product information (name(s), UPC, GSA number, sector, production volume, pH, flashpoint, product form, product use);
- Product characteristics on whether or not the product is:
    - An EPA registered pesticide;
    - A direct release product;
    - A concentrate;
    - Contains enzymes, fragrance, or VOCs;
    - Requires hazard labeling;
    - Ingredient disclosure and performance data submitted;
- Packaging information:
    - Container size and shapes;
    - Material;
    - Supplier;
- Description of all chemical ingredients, including raw materials and alternative ingredients, in product:
    - CAS number;
    - Chemical name;
    - Trade name;
    - Percent composition;
    - Ingredient class;
    - Supplier name;
- An SDS for the product and each ingredient;
- Product performance testing (any method of demonstrating product performance is acceptable as long as it is a commonly used industry standard);
- Other product information specific to particular product classes, such as flushability / compostability for disposable cleaning wipes;
- If available, any supplemental product or ingredient environmental health and safety information, such as:
    - Biodegradation tests on individual ingredients;

- Acute aquatic toxicity tests on product as a whole or individual ingredients;
- Human health and safety tests;

- Description of the type of training the company provides to customers on environmental and worker safety matters.

Information submitted to EPA:
- Summary report, containing same data items as above.

Adding Third-Party Partners and Products

Cleaning product manufacturers will submit information about third-party additions to Safer Choice through their third-party profiler. The three types of third-party partners and products are private labels, licensees, and toll manufacturers. To be label-eligible, third-party products must contain ingredients identical to those in a Safer Choice-labeled product.

Information submitted to EPA:
- Safer Choice Form for Adding Third-Party Partners and Products (Private Label Companies, Licensees, or Toll Manufacturers) (EPA Form XXXX-X) (See Attachment C)

(ii) Respondent activities:

Applicants for Cleaning and Non-Cleaning Product Formulation Partnerships
- Review program information, including instructions on submitting information to third-party profilers (note: third-party profilers are separate and distinct from third-party partners and products; a third-party profiler is an organization that has partnered with the Safer Choice Program to assist in the evaluation of product formulations against the Safer Choice Standard. To become a third-party profiler, the organization must meet stringent requirements as laid out in Section 7 of the Safer Choice Standard.)
- Submit information described in section 4(b)(i) of this supporting statement to third-party profiler;
- Establish agreement with third-party profiler;
- Submit summary report to Safer Choice;
- Negotiate / establish Partnership Agreement with Safer Choice;
- Renew partnership, with no changes needed;
- Site audit (See Attachment D).

Adding Third-Party Partners and Products
- Review program information;
- Fill out and submit Safer Choice Program Form for Adding Third-Party Partners and Products (Private Label Companies, Licensees, or Toll Manufacturers).

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

5(a) Agency Activities

Under the Safer Choice program, EPA engages in the following activities related to the Formulator application and decision process:

- Provide applications via Salesforce for potential participants;
- Answer questions posed by potential applicants regarding recognition under the program;
- Receive the completed applications, review for accuracy, and place any necessary follow-up calls;
- Apply EPA's chemical tools and expertise to understand toxicological characteristics of chemical ingredients and to ensure that they are the safest within their functional use class;
- Approve candidates for recognition and notify both successful and unsuccessful applicants of the decisions; and
- Make final decisions about which products may carry the Safer Choice label.

1 5(b) Collection Methodology and Management

Product manufacturers may obtain applications for providing ingredient information by contacting a third-party profiler. The third-party profiler will then coordinate with EPA to direct the potential applicant to a link via Salesforce to complete the application online. If a product manufacturer would like to submit information that they believe is Confidential Business Information as defined under the Toxic Substances Control Act, the applicant should contact EPA by phone.

In collecting and analyzing the information associated with this ICR, EPA will use a telephone system, personal computers, and applicable database software such as Salesforce. EPA will ensure the accuracy and completeness of collected information by reserving the right to request proof of the list of ingredients (e.g., bills of lading, invoices) or other relevant documentation at any time to confirm that candidates have the achieved the criteria for recognition. The cloud-based Salesforce system, which houses applications and other information related to the Safer Choice program, is designed to reduce the public and Agency burden related to the application and decision process. However, if a product manufacturer would like to submit information as a hard copy rather than using the Salesforce system, the applicant should contact EPA for the appropriate forms.

1 5(c) Small Entity Flexibility

EPA expects that some of the participants in the Safer Choice 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 an application for recognition at any time.

16. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

The average respondent burden is estimated to be 16 hours for new product formulators and 8 hours for product formulators wishing to add third-party partners and products (see Exhibit 6.2). EPA used professional judgment to arrive at a burden estimate and then consulted representatives from the participant categories to make sure the burden estimates were reasonable (see section 3(c)).

EPA expects that for a typical product formulator, program and application review will take about 2 hours (1 managerial, 1 technical). Filling out and submitting third-party profiler information request forms will take about 6 hours (5 technical, 1 clerical), and then establishing an agreement with the third-party profiler will take about 3 hours (1 managerial, 1 technical, 1 clerical). Submitting a summary report to Safer Choice will take about 2 hours (1 managerial, 1 technical). Finally, establishing a Partnership Agreement with Safer Choice will take 3 hours (1 managerial, 2 technical).

For a typical addition of a third-party partner and products, program and application review will take about 2 hours (1 managerial, 1 technical). Filling out and submitting one Safer Choice Program Form for Adding Third-Party Partners and Products (Private Label Companies, Licensees, or Toll Manufacturers) is estimated to take about 2 hours (1.5 technical, 0.5 clerical). On average, a partner will fill out 3 third-party partners and products forms annually. Therefore, it is estimated that it will take one respondent 6 hours (4.5 technical, 1.5 clerical) to add third-party partners and products.

In addition to the burden associated with first-time submission of applications, each formulator has the opportunity to renew its Partnership Agreement at the end of the three-year partnership period. This means that once every three years, the formulator re-submits its application for each partnership product to confirm that no changes have been made to ingredients. EPA then evaluates the application. EPA estimates that the partnership renewal process will take 4 hours (3 technical, 1 clerical) for cleaning and non-cleaning product formulators.

For purposes of this ICR, EPA expects that 108 (see Section 6(e) on estimating the respondent universe) product formulators will choose to renew their partnerships. Furthermore, EPA anticipates that one in ten product formulators (i.e., 12) over the three-year period of this ICR will need to make improvements to their formulations so that they contain the safest ingredients within each functional use class; in these cases, a new partnership approval process, as described above, will be triggered. The associated burden for completing the new partnership approval process is assumed to be the same as first-time submission.

As part of the application process, the third-party profiler will also reserve the right to conduct site audits and desk audits. The purpose of site visits to facilities is to verify that each partnership product contains the same ingredients, in the same volumes, that are reported by the company as part of the Safer Choice recognition process. The site auditor will review batch tickets associated with each recognized product to ensure that ingredient claims are accurate. Additional audit procedures are listed in Attachment D of this document. For purposes of estimating annual cost and burden in Exhibit 6.2, it is assumed that about 33% of formulators will get audited on-site each year over the three-year period of this ICR. Each site audit is estimated to require two hours of a technical person’s time and one hour of a clerical person’s time. Desk audits will also be conducted by third-party profilers. Prior to the desk audit, formulators will be responsible for providing a list of all ingredients for each recognized product, product labels displaying the Safer Choice logo, private label information (where applicable), and various other materials. For the purposes of estimating annual cost and burden in Exhibit 6.2, it is assumed that 66% of formulators will be subject to a desk audit each year over the three-year period of this ICR. Each desk audit is estimated to require two hours of a technical person’s time and two hours

of a clerical person's time. As with the site audits, additional information on desk audits can be found in Attachment D of this document.

6(b) Estimating Respondent Costs

EPA estimates an average loaded hourly labor rate (base hourly rate plus fringe and overhead) of $83 for managerial staff, $73 for technical staff, and $32 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 September 2015. 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*[1] and the *Revised Economic Analysis for the Amended Inventory Update Rule: Final Report*.[2] In addition, the hourly labor rates have been rounded for the purposes of this ICR. The type of staff needed to complete the Formulator's applications and their associated hourly labor rates were verified by contacting representatives from the participant categories.

The derivation of labor rates for managerial, technical, and clerical staff appears in Exhibit 6.1.

1**Exhibit 6.1. Derivation of Loaded Wage Rates in 2015$**

Labor category	Wage	Fringe Benefit	Fringes as % wage	Overhead % wage	Fringe + overhead factor	Loaded Wages	Loaded Wages (rounded)
	(a)	(b)	(c)=(b)/(a)	(d)	(e)=(c)+(d)+1	(f)=(a) × (e)	
Managerial[3]	$49.78	$24.70	49.62%	17%	1.67	$82.94	$83.00
Professional/ Technical[2]	$42.76	$23.07	53.95%	17%	1.71	$73.10	$73.00
Clerical[2]	$19.04	$9.61	50.47%	17%	1.67	$31.89	$32.00

In exhibit 6.2 is the breakdown of burden costs, assuming 16 hours for completing the partnership agreement, 11 hours for renewals and associated audits, and 8 hours for cleaning product formulators wishing to add third-party partners and products. The third-party profiler verification process for cleaning products also adds an operating and management (O&M) cost of about $12,400 per company per application. This cost estimate is from NSF International, which has experience as a third-party profiler of ingredient characteristics. For this ICR, it is assumed that typical product manufacturers will submit four products in an application. Each product is assumed to contain 2 ingredients at $650 each, 1 proprietary ingredient at $1,300 each, and 3 CleanGredients™ ingredient at no charge, for a total of $2,600 per product. In addition, a $500 administrative fee per product is assumed. The total will be $12,400 per company per application. No additional capital or O&M costs are incurred by respondents under this ICR.

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1 EPA, 2002b. 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.

2 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.

3 Bureau of Labor Statistics (BLS) *Employer Costs for Employee Compensation, Supplementary Tables.* From Supplementary Table 2, Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Private industry workers in manufacturing industries, by occupational group, establishment size and bargaining status, September 2015. Available at: http://www.bls.gov/ncs/ect/sp/ecsuptc36.pdf

1**Exhibit 6.2. Estimated Annual Burden and Costs to Respondents**

Collection activity	Hours and Costs Per Respondent							Total Hours and Costs		
	Managerial $83/Hour	Technical $73/Hour	Clerical $32/Hour	Response Hours/Year	Labor Cost/Year	Capital Cost	O & M Cost*	Number of Respon.**	Total Hours/Year	Total Cost/Year
Partnership Agreements										
Review program information	1.0	1.0	-	2.0	$156	$0	$0	44	88	$6,864
Fill out and submit third-party information request form	-	5.0	1.0	6.0	$397	$0	$0	44	264	$17,468
Establish agreement with third-party profiler	1.0	1.0	1.0	3.0	$188	$0	$12,400	44	132	$553,872
Submit summary report to Safer Choice	1.0	1.0	-	2.0	$156	$0	$0	44	88	$6,684
Negotiate / establish Partnership Agreement with Safer Choice	1.0	2.0	-	3.0	$229	$0	$0	44	132	$10,076
Subtotal	*4.0*	*10.0*	*2.0*	*16.0*	*$1,126*	*$0*	*$12,400*	*44*	*704*	*$595,144*
Renewals and Audits										
Renew partnership, with no changes needed	-	3.0	1.0	4.0	$251	$0	$0	36	144	$9,036
Desk audit	-	2.0	2.0	4.0	$210	$0	$0	24	96	$5,040
Site audit	-	2.0	1.0	3.0	$178	$0	$0	12	36	$2,136
Subtotal	-	*7.0*	*4.0*	*11.0*	*$639*	*$0*	*$0*	*36*	*276*	*$16,212*
Adding Third-Party Partners and Products										
Review program information	1.0	1.0	-	2.0	$156	$0	$0	77	154	$12,012
Fill out and submit form for adding third-party partners and products	-	4.5	1.5	6.0	$377	$0	$0	77	462	$28,991
Subtotal	*1.0*	*5.5*	*1.5*	*8.0*	*$533*	*$0*	*$0*	*77*	*616*	*$41,003*
TOTAL								***157***	***1,596***	***$652,359***

* The cost for third-party profiler review and verification assumes that the typical application submitted by a cleaning product manufacturer will contain four products, each with 2 ingredients ($650 each), 1 proprietary ingredient ($1,300), and a $500 administrative fee. The total cost per product is $3,100. The total will be $12,400 per company per application.
**This column reports the number of annual respondents after accounting for the partnership renewal process. Assumes that one in ten formulators over the three-year period will need to make changes to their formulations and go through a new partnership process which includes same collection steps. On an annual basis, this translates to 4 product formulators (for a total of 44 partnership agreements). Also assumes that about 33% of the remaining product formulators will be subject to site audits each year (i.e., 12) and that about 66% (i.e., 24) will be subject to desk audits each year. See Section 6(a) for additional explanation. Assumes that 77 partners will fill out third-party partners and products forms based on historical data. See Section 6(e) for additional explanation.

6(c) Estimating Agency Burden

1Exhibit 6.3 presents the estimated Agency burden hours and costs associated with the information collection activities under this ICR. EPA based its burden estimates on its experience managing other voluntary programs.

EPA expects that review of the program application forms for a typical product formulator will take about 1 hour (1 technical). Reviewing the third-party profiler information summary report will take about 5 hours (5 technical). Establishing a Partnership Agreement with the formulator will take about 3 hours (1 managerial, 2 technical). Reviewing the partnership renewal and assuming that no changes are needed is estimated at 2 hours (1 managerial, 1 technical), and reviewing audit summaries is estimated at 1 hour (1 technical).

The burden for reviewing the Safer Choice Form for adding third-party partners and products is estimated to take about 2 hours (2 technical).

6(d) Estimating Agency Costs

Agency labor costs are calculated based on hourly basic rates for federal employees in the Washington-Baltimore area published by the Office of Personnel Management effective January 2016[0]. The average hourly labor rate for managerial staff is estimated as the rate for a GS-13 Step 5 employee, for technical staff as a GS-10 Step 10 employee, and for clerical staff as GS-5 Step 1. These GS-level assumptions are consistent with those used in past EPA OPPT ICRs. The hourly rates were multiplied by an assumed loading factor of 1.6 to reflect Federal fringe benefits and overhead. This loading factor is from an EPA guide, *Instructions for Preparing Information Collection Requests (ICRs)* (OPPE, 1992, page 30, footnote 9).

The resulting average hourly labor rates, rounded to the nearest dollar amount, are $80 for managerial staff, $59 for technical staff, and $27 for clerical staff. The Agency expects most activities related to this ICR to be performed by managerial staff (14 percent) and technical staff (86 percent).

[0] OPM, 2016. Salary Table 2016-DCB, *Washington Baltimore Northern Virginia, DC-MD-PA-VA-WV*. Available at http://www.opm.gov/oca/16tables/pdf/dcb_h.pdf

Exhibit 6.3. Annual Agency Burden/Cost

Collection activity	Hours and Costs Per Respondent						Total Hours and Costs		
	Managerial $80/Hour	Technical $59/Hour	Agency Hours/Year	Labor Cost/Year	Capital/ Startup Cost	O & M Cost	Number of Respon.*	Total Hours/Year	Total Cost/Year
Cleaning and Non-Cleaning Products									
Review program application forms	-	1.0	1.0	$59	$0	$0	44	44	$2,596
Review third-party profiler summary	-	5.0	5.0	$295	$0	$0	44	220	$12,980
Negotiate / establish Partnership Agreement with formulator	1.0	2.0	3.0	$198	$0	$0	44	132	$8,712
Review partnership renewal, with no changes needed	1.0	1.0	2.0	$139	$0	$0	36	72	$5,004
Review audit summaries	-	1.0	1.0	$59	$0	$0	36	36	$2,124
Subtotal	*2.0*	*10.0*	*12.0*	*$750*	*$0*	*$0*	*80*	*504*	*$31,416*
Adding Third-Party Partners and Products									
Review Safer Choice form for adding third-party partners and products	-	2.0	2.0	$118	$0	$0	77	154	$9,086
Subtotal	-	*2.0*	*2.0*	*$118*	*$0*	*$0*	*77*	*154*	*$9,086*
TOTAL							***157***	***658***	***$40,502***

*This column reports the number of respondents after accounting for the partnership renewal process. Assumes that one in ten formulators will need to make changes to their formulations and go through a new partnership process which includes same collection steps, i.e. 4, for a total of 44 annually. Assumes that 77 partners will fill out third-party partners and products forms based on historical data.

16(e) Estimating the Respondent Universe and Total Burden and Costs

EPA estimates that 120 formulators will submit applications over the three-year life of the clearance. EPA expects the participation will ramp up over the three year period but, for the purposes of estimating annual cost and burden in Exhibit 6.2, it is assumed that 40 product formulator applications will be submitted each year. This estimate is based on historical data and the assumption that participation will increase over the next three years in response to greater consumer demand for safer products and increased awareness of the Safer Choice label. EPA also expects 40 renewals per year, 10% of which will need to make changes to formulations and go through a new partnership process. Additionally, EPA estimates that 77 applications will be received annually to add third-party partners and products. This estimate is based on the average number of partners that submitted third-party partners and products applications over the past five years (62) and is expected to increase over the course of this ICR period due to the new label (25%). Therefore, it is estimated that a total of 157 respondents will submit applications under the Formulator program each year. The annual burden hours and cost associated with this information collection are 1,596 hours and $652,359 respectively.

1 6(f) Bottom Line Burden Hours and Cost Tables

a. Respondent Tally

Exhibit 6.4 below summarizes the total annual estimated respondent burden and cost. These estimates represent the average burden in any given year over the three years covered by this ICR.

Exhibit 6.4. Total Annual Estimated Respondent Burden and Cost Summary

Total # of Respondents	Total Burden Hours	Annual Cost
157	1,596	$652,359

b. Agency Tally

Exhibit 6.5 below summarizes the total annual estimated agency burden and cost. These estimates represent the average burden in any given year over the three years covered by this ICR.

Exhibit 6.5. Total Annual Estimated Agency Burden and Cost Summary

Burden Hours	Annual Cost
658	$40,502

6(g) Reasons for Change in Burden

This request reflects an increase in the estimated annual burden of 362 hours (from 1,234 hours to 1,596 hours) from that currently in the OMB inventory. EPA reduced per-response burden estimates compared to those in the previous ICR based on expected efficiencies created by using the Salesforce-based Safer Choice Community on the part of respondents. However, the

number of respondents increased, compared to the prior ICR, due to historical experience and increases in the expected future number of responses due to greater consumer awareness and demand for products with the Safer Choice label. This change is an adjustment.

6(h) Burden Statement

The annual public burden for this collection of information is estimated at 16 hours per response for formulators, 11 hours for formulators renewing a partnership that requires changes, and 8 hours for cleaning product formulators wishing to add third-party partners and products, 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 in title 40 of the CFR, after appearing in the Federal Register, are listed in 40 CFR part 9 and included on the related collection instrument or form, if applicable.

The Agency has established a public docket for this ICR under Docket ID No. EPA-HQ-OPPT-2015-0437, which is available for online viewing at www.regulations.gov, or in person viewing at the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center 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 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-2015-0437 and OMB Control No. 2070-0178, to (1) EPA online using www.regulations.gov (our preferred method), or by mail to: Document Control Office (DCO), Office of Pollution Prevention and Toxics (OPPT), Environmental Protection Agency, Mail Code: 7407T, 1200 Pennsylvania Ave., NW, Washington, D.C. 20460, and (2) OMB by mail to: Office of Information and Regulatory Affairs, Office of Management and Budget (OMB), Attention: Desk Officer for EPA, 725 17th Street, NW, Washington, DC 20503.

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-2015-0437. These attachments are available for online viewing at www.regulations.gov or otherwise accessed as described above in Section 6(h) of the Supporting Statement.

Attachment A: **42 USC 13103 - Pollution Prevention Act Section 6604**

Attachment B: **Safer Choice Program: Product and Ingredient Submissions in Salesforce**

Attachment C: **Safer Choice Program: Form for Adding Third-Party Partners and Products (Private Label Companies, Licensees, or Toll Manufacturers)**

Attachment D: **Safer Choice Program: Audit Process Guidance**

Attachment E: **Copy of Consultations Message Sent by EPA to Potential Respondents**

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