Attachment D
Consultation for OPP ICR: "Experimental Use Permits for Pesticides," (OMB No. 2070-0040, EPA No. 0276.16)

I. Representative(s) Consulted:

A. CropLife America
B. J. R. Simplot Company
C. Monsanto Company

II. Consultation Questions

1. Publicly Available Data

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

  A. N/A
  B. No
  C. No

- If yes, where can you find the data?

  A. N/A
  B. N/A
  C. N/A

2. Frequency of Collection

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

  A. N/A
  B. No, as mentioned in the ICR the frequency is one time only.
  C. In our opinion, the frequency of every three years is appropriate.

3. Clarity of Instructions

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

  - Based on the instructions (regulations, PR Notices, etc.), is it clear what you are required to do and how to submit the data?

    A. N/A
    B. Yes
    C. Yes

  - If not, what suggestions do you have to clarify the instructions?

A. N/A
B. N/A
C. N/A

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

  A. N/A
  B. Yes
  C. 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?

  A. N/A
  B. No, the flexibility of the format allows for clarity of presentation regardless of the type of information being submitted.
  C. No

- Regarding the any pesticide registration forms, do you use them? Are they clear, logical, and easy to complete?

  A. N/A
  B. We use the forms and they are clear and easy to complete.
  C. Yes, Monsanto Company uses the appropriate pesticide registration forms which we find clear, logical, and easy to complete.

4. Electronic Reporting and Record keeping

Federal agencies are required under 5 CFR 1320.5(a)(1)(iii)(E), to indicate whether the proposed collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology. In September 2015, OPP debuted a new electronic system for pesticide applications, the Pesticide Submission Portal (PSP). The electronic submission process is a combination of document file uploads and providing information online that is equivalent to existing OMB approved forms that would otherwise be filled out, printed, and mailed to EPA.

The paperwork burdens associated with the submissions of pesticide registration applications through the PSP are covered under the "Application for New and Amended Pesticide Registration" ICR. Additionally, the current PSP leverages the Agency's existing Central Data Exchange (CDX) to provide a secure method of submitting these documents and information within a secure online environment. CDX does require initial user registration for which the paperwork burden estimate is covered under "Cross-Media Electronic Reporting Rule" ICR.

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

  A. N/A
  B. Yes, as Word documents (.docx, .xlsx) and in portable document format (.pdf).
  C. Yes, Monsanto Company maintains electronic records of all PIP submissions in a PDF format.

- Have you used the new Pesticide Submissions Portal to submit the information being collected in this ICR?

  A. N/A
  B. No, but plan to use it for next submission.
  C. Yes

  - If yes, how long did it take you to create a login and a password through the Central Data Exchange (CDX) reporting site? How long did it take you to submit the information related to this ICR in the PSP?

    A. N/A
    B. N/A
    C. In our experience, it took approximately 1.0 hours to establish login and password credentials through CDX. The actual submission was less in time equaling approximately 0.5 hour.

- Since the Agency started offering an electronic reporting option through EPA's CDX reporting site, would you be more inclined to submit the information associated with this ICR in PSP or on diskette than on paper?

  A. N/A
  B. Yes
  C. Yes

- What benefits would electronic submission bring you in terms of burden reduction

or greater efficiency in compiling the information?

A. N/A
B. Electronic submissions would reduce burdens associated with cost and time for printing, compiling, and shipping.
C. The benefit of making electronic submission reduces the burden of time to gather information, review information, and make the submission.

5. Burden and Costs

- Are the labor rates accurate?
  A. N/A
  B. Yes
  C. Yes

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

A. N/A
B. Yes
C. Yes

- 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?

A. N/A
B. Yes
C. Yes

- Have you incurred additional paperwork burden as a result of third party disclosure requirements involving disclosing product specific information to potential users and the general public through the pesticide label?

A. N/A
B. No
C. No

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

A. N/A
B. No
C. No burden and cost estimates were found to be substantially different from EPA's.

  - 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.