### Table 6.1 Average Annual Burden Estimates per Registrant ResponderComply with the Requirements for Nonrefillable Containers

		w Formulations and ply (All Registrants)	Preparing and (1 <sup>c</sup>
Activity	Burden Hours (per Year)		Burden Hours (per Year)
	Administrative	Costs (\$ per Year)	Professional
1. Read instructions	0	0	0.5
2. Plan activities	0	0	0.5
3. Gather information	1	48	2
4. Record information	1	48	0.5
5. Store/maintain data	1	48	0.5
Total Burden	3	144	4

#### ANNUAL BURDEN:

(3 hours per registrant X 1,804 registrants) + (4 h

#### ANNUAL COST:

(3 hours per registrant X \$47.78/hour X 1,804 reg

258,585	
10,340	5484.16
268,925	

Processing Waiver Requests % of Registrants)	
Costs (\$ per Year)	
72	
72	
286	
72	
72	
572	
	-

-

47.78 143.29

iours per registrant X (1,804 registrants X 1% of registrants)) = 5,412 hours + 72 hours = 5

jistrants) + (4 hours per registrant X \$143.29/hour X (1,804 registrant X 1% of registrants))

#### າt to

,484 hours per year

) = \$258,585 + \$10,340 = \$268,925

# Table 6.2 Average Annual Burden Estimates per Registrant Respondent toComply with the Requirements for Refillable Containers and DistributingPesticide to Refillers for Repackaging

	Burden Hours (per	Year)	Costs (\$ per Year)	
Activity	Administrative	Total Hours	(\$47.78 per hour)	
1. Read instructions	0	0	0	
2. Plan activities	0	0	0	
3. Record information	1.75	1.75	84	
4 Store/maintain data	1.25	1.25	60	
Total Burden	3	3	143.34	144 used

#### ANNUAL BURDEN:

3 hours per registrant X 1,804 registrants =5,412 hours per year

5,412

#### ANNUAL COST:

3 hours per registrant X \$47.78/hour X 1,804 registrants = \$172,390 258,585.36

258,585.36

n the table

### Table 6.3 Average Annual Burden Estimates per Registrant Respondent forRegistrants that Repackage Directly into Refillable Containers

	Burden Hours	(per Year)	Costs (\$ per Year)	
Activity	Administrative	Total Hours	(\$47.78 per hour)	
1. Read instructions	0.5	0.5	24	24
2. Plan activities	0.5	0.5	24	24
2. Gather Information	1	1	48	48
3. Record information	1.5	1.5	72	72
4. Enforce & Monitor	4	4	191	192
5. Store/maintain data	0.5	0.5	24	24
Total Burden	8	8	382	384
	8	8	382	382

192

#### ANNUAL BURDEN:

7.5 hours per registrant X 1,804 facilities = 13,530 hours per year 14,432.00 Nancy used 8 hours

#### ANNUAL COST:

7.5 hours per registrant X \$47.78/hour X 1,804 facilities = \$646,463

689,560.96 689,561

#### TOTAL ANNUAL BURDEN:

5,484 + 5,412 + 14,432 = 25,328 hours per year

#### TOTAL ANNUAL COSTS:

\$268,925+ \$258,585 + \$689,561 = \$1,217,071

8 hours per registrant X 1,804 facilities = 14,432 hours per year

8 hours per registrant X \$47.78/hour X 1,804 facilities = \$689,561

## Table 6.4 Average Annual Burden Estimates per Agricultural Pesticide RefillerRespondent for Repackaging Directly into Refillable Containers

Activity	Burden H	ours (per Year)	Costs (\$ per Year) (\$47.78
	Administrative	Total Hours	per hour)
1. Read instructions	0.5	0.5	24
2. Plan activities	0.5	0.5	24
3. Gather Information	1	1	48
4. Record information	1.5	1.5	72
5. Enforce and Monitor	4	4	192
6. Store/maintain data	0.5	0.5	24
Total Burden	8	8	382

#### ANNUAL BURDEN:

8 hours per refiller X 16,795 refillers = 134,360 hours per year

#### ANNUAL COST:

8 hours per refiller X \$47.78/hour X 16,795 refillers = \$6,419,721 per year

6,419,720.80 6,419,721 335,900

6,755,621

383 rounded up to 384

Table 6.5 Average Annual Burden Estimates per Swimming Pool Supply Companyfor Repackaging Directly into Refillable Containers

	Burden Hours	(per Year)	Costs (\$ per Year)
Activity	Administrative	Total Hours	(\$47.78 per hour)
1. Read instructions	0.5	0.5	24
2. Plan activities	0.5	0.5	24
3. Gather Information	1	1	48
4. Record information	1	1	48
5. Enforce and Monitor	4	4	192
6. Store/maintain data	0.5	0.5	24
Total Burden	7.5	7.5	358

359.23 rounded up to 360

#### ANNUAL BURDEN:

8 hours per company x 322 companies = 2,415 hours per year

#### ANNUAL COST:

7.5 hours per company X \$47.78/hour X 322 companies = \$115,389 115,388.70

Collection Activity	Annua	al Burden	
	Hours	Cost	
Respondent Burden and Costs			
Registrants (see 6(a)(i)(1))	25,328	1,271,071	1,271,071
Ag Refillers (see 6(a)(i)(2)	134,360	6,755,621	6,419,721
Swimming Pool Suppliers (see 6(a)(i)(3)	2,415	\$115,389	115,389
Total:	162,103	\$8,142,081	7,806,181

\$18,441

232

Annual Agency Burden and Costs

Agency Total (See Table 6.8)

#### Table 6.6 Annual Bottom Line Burden and Costs for Container Regulations

1,271,071 6,755,621 have to add additional \$335,900 115,389 8,142,081

### Table 6.7 Annual Average Burden Estimates per Respondent to Comply with theContainment Regulations

	Burden Hours	(per Year)	Costs (\$ per Year)
Activity	Administrative	Total Hours	(\$47.78 per hour)
1. Read instructions	0	0	0
2. Plan activities	0	0	0
3. Record information	3	3	144
4. Monitor & enforce	1	1	48
Total Burden	4	4	192

#### ANNUAL BURDEN:

4 hours per facility x 4,665 facilities = 18,660 hours per year

#### ANNUAL COSTS:

4 hours X \$47.78/hour X 4,665 facilities = \$891,575 891575

# Table 6.8 Average Annual EPA Burden Estimates for EPA to Implement theContainer and Containment Regulations

COLLECTION ACTIVITIES	BURD	EN HOURS	(per year)		COSTS (\$ per year)
	Management \$132/hr.	Technical \$87/hr.	Clerical \$49/hr.	Total Hours	Total Costs
1) Receive notifications, waiver requests and inquiries	2	90	10	102	8,584
2) Plan activities	5	20	5	30	2,645
3) Record information	0	20	10	30	2,230
4) Complete paperwork	0	30	15	45	3,345
5) Monitor DOT regulatory actions and publish FRNs	0	10	5	15	1,115
6) Store/maintain data	0	0	10	10	490
TOTAL BURDEN	7	170	55	232	18,409

(a) Management - 7 hours X \$132	924
(b) Technical - 170 hours x \$87	14,790
(c) Clerical - 55 hours x \$49	2,695
TOTAL	18,409

18,409

### Table 6.9 Annual Bottom Line Hours and Costs / Master Table

#### **Collection Activity**

#### Respondent (Regulated Community) Burden and Costs

Container Design and Residue Removal (Table 6.6)

Containment Structures (Table 6.7):

Total Respondent Burden and Cost for Container and Containment Regulations Combined

Annual Agency Burden and Costs – Container Design and Residue Removal

Container Design and Residue Removal (See Table 6.8)

Containment Structures (See Subsection 6(b))

Total Agency Burden and Cost for Container and Containment Regulations Combined

Annual B	Annual Burden	
Hours	Cost	
162,103	\$8,142,081	
18,660	\$891,575	
180,763	\$9,033,656	
232	\$18,409	
0	0	
232	\$18,409	

updated June 26, 2019

#### Chemical Manufacturing (3251, 3252, 3253, and 3259 only)

Labor Category:	Formula	Managerial
Unloaded Hourly Rate <sup>1</sup>	= W	\$65.52
Benefits Percentage <sup>2</sup>	Lb = B/W	45.8%
Benefits per hour	B = W*Lb	\$ 30.01
Loaded Hourly Rate	Wb = W + B = W(1+Lb)	\$95.53
Overhead Percentage <sup>3</sup>	Lo = OH/Wb	50%
Overhead per hour	OH = Wb*Lo	\$ 47.76
Fully Loaded Hourly Rate	Wf = Wb + OH = W + B + OH	\$143.29

1. Data Source: BLS <u>https://www.bls.</u>

NAICS: 3250A1

https://www.bls.gov/oes/current/naics4\_3250A1.htm

NAICS 3250A1 - Chemical Manufacturing (3251, 3252, 3253, and 3259 only) Standard Occupational Codes:

Management:11-0000, Management OccupationsTechnical:19-0000, Life, Physical, and Social Science OccupationsClerical:43-0000, Office and Administrative Support Occupations

2. Fringe benefits/wage per hour. The average for non farm, non federal civilian workers. indirect costs is within the range of 20-70% of the load labor rate (wage + benefits) suggested in EI

Technical		C	lerical	
\$34.27		\$2	21.85	
45.8%		4	5.8%	
\$	15.69	\$		10.01
\$49.96		\$3	31.86	
50%			50%	
\$	24.98	\$		15.93
\$74.95		\$4	47.78	

#### May 2018 data

Last Modified Date: April 2, 2019

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PA guidance.

NOTE: NAICS code changed from 325300 to 3250A1 from Sept 2017 update to May 2018 update Pesticide Registrants now lies within Chemical Manufacturing (3251, 3252, 3253, and 3259 only)

### NAICS: 999100 updated June 28, 2019

Labor Category:	Formula	Managerial		Technica	1
Unloaded Hourly Rate <sup>1</sup>	= W	\$ 60.	.42	\$	39.89
Benefits Percentage <sup>2</sup>	Lb = B/W	45.8%		45.8%	
Benefits per hour	B = W*Lb	\$ 27.	.67	\$	18.27
Loaded Hourly Rate	Wb = W + B = W(1+Lb)	\$88.09		\$58.16	
Overhead Percentage <sup>3</sup>	Lo = OH/Wb	50%		50%	
Overhead per hour	OH = Wb*Lo	\$ 44.	.05	\$	29.08
Fully Loaded Hourly Rate	Wf = Wb + OH $= W + B + OH$	\$132.14		\$87.24	

#### **EPA or Federal Government**

1. Data Source: BLS <u>http://www.bls.gov/oes/current/naics4\_999100.htm</u>

NAICS 999100 - Federal Executive Branch

Standard Occupational Codes:

Management: 11-0000, Management Occupations

Technical: 19-0000, Life, Physical, and Social Science Occupations

Clerical: 43-0000, Office and Administrative Support Occupations

2. Fringe benefits/wage per hour. The average for non farm, non federal civilian workers. benefits) suggested in EPA guidance.

Clerical	
\$	22.33
45.8%	
\$	10.23
\$32.56	
50%	
\$	16.28
\$48.83	

#### May 2018 data

Last Modified Date: April 2, 2019

updated 4/08/2014

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