

Table 6.1 Average Annual Burden Estimates per Registrant Responder Comply with the Requirements for Nonrefillable Containers

Activity	Ensuring that New Formulations and Containers Comply (All Registrants)		Preparing and (19
	Burden Hours (per Year)	Costs (\$ per Year)	Burden Hours (per Year)
	Administrative		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

268,925

5484.16

It to

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

47.78

143.29

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

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

5,484 hours per year

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

Table 6.2 Average Annual Burden Estimates per Registrant Respondent to Comply with the Requirements for Refillable Containers and Distributing Pesticide to Refillers for Repackaging

Activity	Burden Hours (per Year)		Costs (\$ per Year) (\$47.78 per hour)
	Administrative	Total Hours	
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 i

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 for Registrants that Repackage Directly into Refillable Containers

Activity	Burden Hours (per Year)		Costs (\$ per Year) (\$47.78 per hour)		
	Administrative	Total Hours			
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	192
5. Store/maintain data	0.5	0.5	24	24	
Total Burden	8	8	382	384	
	8	8	382	382	

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 Refiller Respondent for Repackaging Directly into Refillable Containers

Activity	Burden Hours (per Year)		Costs (\$ per Year) (\$47.78 per hour)
	Administrative	Total Hours	
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 Company for Repackaging Directly into Refillable Containers

Activity	Burden Hours (per Year)		Costs (\$ per Year) (\$47.78 per hour)
	Administrative	Total Hours	
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

Table 6.6 Annual Bottom Line Burden and Costs for Container Regulations

Collection Activity	Annual Burden		
	Hours	Cost	
<i>Respondent Burden and Costs</i>			
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
<i>Annual Agency Burden and Costs</i>			
Agency Total (See Table 6.8)	232	\$18,441	

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 the Containment Regulations

Activity	Burden Hours (per Year)		Costs (\$ per Year) (\$47.78 per hour)
	Administrative	Total Hours	
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 the Container and Containment Regulations

COLLECTION ACTIVITIES	BURDEN 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

8584

2645

2230

3345

1115

490

18,409

Table 6.9 Annual Bottom Line Hours and Costs / Master Table

Collection Activity
<i>Respondent (Regulated Community) Burden and Costs</i>
Container Design and Residue Removal (Table 6.6)
Containment Structures (Table 6.7):
Total Respondent Burden and Cost for Container and Containment Regulations Combined
<i>Annual Agency Burden and Costs – Container Design and Residue Removal</i>
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 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

NAICS: 3250A1

updated June 26, 2019

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

Labor Category:	Formula	Managerial
Unloaded Hourly Rate ¹	= W	\$65.52
Benefits Percentage ²	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 ³	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

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 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.

3. U. S. Environmental Protection Agency, *EPA Air Pollution Control Cost Manual, Sixth Edition*, indirect costs is within the range of 20-70% of the load labor rate (wage + benefits) suggested in EI

Technical		Clerical	
\$34.27		\$21.85	
45.8%		45.8%	
\$	15.69	\$	10.01
\$49.96		\$31.86	
50%		50%	
\$	24.98	\$	15.93
\$74.95		\$47.78	

May 2018 data

Last Modified Date: April 2, 2019

EPA-452-02-001, January 2002, pg. 2-34. The loading for
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

EPA or Federal Government

Labor Category:	Formula	Managerial	Technical
Unloaded Hourly Rate ¹	= W	\$ 60.42	\$ 39.89
Benefits Percentage ²	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 ³	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

1. Data Source: BLS http://www.bls.gov/oes/current/naics4_999100.htm

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.

3. U. S. Environmental Protection Agency, *EPA Air Pollution Control Cost Manual, Sixth Edition*, January 2002, pg. 2-34. The loading for indirect costs is within the range of 20-70% of the load (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

tion, EPA-452-02-001,
 id labor rate (wage +