

Attachment J

Respondent & Agency Burden

A. Estimating Respondent Burden

Authorized Agencies' Reporting for Certification and Training Programs

Authorized Agencies' reports on certification and training programs: EPA based the respondents' burden hour estimates on experience with and knowledge of the Certification and Training Program; Regional contacts and budget staffing records of the Regional offices; and information obtained from the consultation process, USDA, authorized agencies, and other resources. The total annual burden for EPA's State, Federal, and Tribal partners (authorized agencies) to report on certification and training programs is estimated to be 4,408.95 hours, with an average annual burden of 77.35 hours for each of the 57 participating entities (see Table 1). The average per-State burden was based on several estimates provided to EPA by participating States.

Certification and/or Training Applications under EPA-Administered Programs in Indian Country

EPA now administers two separate programs under the Federal certification plan for Indian Country throughout the US: a Federal plan for Navajo Indian Country, and a national Federal plan for all other Indian Country. The national plan was implemented beginning February 6, 2014. As of October 2017, there were 933 commercial applicators and 285 private applicators certified through the national Federal plan for "all other Indian Country". In 2015 there were 16 commercial applicators and 2 private applicators certified through the Federal plan for Navajo Indian Country. Combined there were a total of 1,242 certified applicators for both the Navajo and other Indian Country certification programs. The burden and associated labor cost estimates below represent a single estimate for both Federal plans in Indian Country throughout the U.S. With an average per-response burden estimate of 0.17 hours (10 minutes), the total annual burden for completing certification application forms for both commercial and private applicators is estimated to be 211.14 hours (see Table 2a).

The optional, EPA-administered course for private applicators in the Federal plan takes 12 hours. Further, 6 private applicators chose optional training in the 2017. The estimated total annual burden for this response is 72.6 hours (Table 2b). In future cycles, EPA anticipates that a total of 6 private applicators on average annually who will choose the optional training, covering applicators seeking initial certification and recertification.

Recordkeeping for RUP Sales and Pesticide Applications

Commercial applicators under the Federal (EPA-administered) program: The total annual burden of recordkeeping for restricted use pesticide applications by commercial

applicators under Federal certification programs (Indian Country throughout the U.S.) is estimated to be 2,914 hours, with an average burden estimate of 3.1 hours per response, for each of an estimated 940 responses (see Table 3).

Commercial applicators under programs administered by “authorized agencies”: Commercial applicators and firms under authorized programs are also required to generate and maintain records of RUP applications immediately after the application. The Agency estimates that 442,464 commercial applicators will be subject to the recordkeeping requirements, for a total annual response burden of 1,371,638 hours. The average per-response burden is 3.1 hours (see Table 4).

Dealer sales of RUP Products under Federal (Indian Country, EPA-administered) programs: RUP dealers are required to record sales of RUPs and maintain these records. In this ICR, only the cost and burden estimates for dealer recordkeeping under federal certification programs are included. All 57 programs administered by authorized agencies have implemented certification programs which they currently administer. States’ certification programs use State authority to require dealers to maintain sales records for RUPs and are not included in the estimates of this ICR.

The Agency estimates that there are 49 RUP dealers in Indian Country. Each RUP dealer has approximately 39 RUP sales transactions per year, which require approximately 3 minutes of dealer burden per transaction. This results in 95.55 hours total annual burden to collect and record information (Table 5a).

RUP Dealership Information Reporting

Dealership information under EPA-administered programs: RUP dealers are required to report the name of the business and each dealership’s names and address to EPA only once. However, updated information must be submitted if the dealership information changes. This may include a new company submitting contact information, and existing company submitting a name change, or contact information change such as an address or telephone number change, or a company that is no longer in business submitting information.

Based on the current number of 49 dealers under the Federal program, the Agency estimates that approximately one third of the 49 respondents require some type of information change over a three-year period, or approximately 16 RUP dealers per year. Each of the dealership information reporting activities is estimated to require approximately 1 hour of dealer burden. This results in an annual total burden of approximately one hour to collect, submit, and maintain information. The approximate number of respondents is 16, therefore the total number of hours resulting from information change is 16 burden hours. (Table 5b).

Applicator training and sales of anthrax-related products

In estimating the average respondent burden related to the information collection components on anthrax-related products, EPA based the burden hour and cost estimates on its experience and information obtained from the consultation process and other resources. The total annual burden for affected registrants for training and examination activities is estimated to be 50 hours, with an average burden of 25 hours each for approximately 2 registrants (see Table 6). The total annual burden for recordkeeping of persons trained and persons/entities to whom anthrax-related products are sold or distributed is estimated to be 37 hours, with an average burden of 18.5 hours for each of 2 registrants (see Table 7).

B. Estimating Respondent Costs

Agency economists revised the estimated wages, benefits and overhead for all labor categories for affected industries, state government, and EPA employees based on publicly available data from the US Bureau of Labor Statistics. The formulas used to estimate the labor rates and formulas used to derive the fully loaded rates and overhead costs for this ICR renewal are listed in **Attachment H**.

Methodology	The methodology uses data on each sector and labor type for an <i>Unloaded wage rate</i> (hourly wage rate), and calculates the <i>Loaded wage rate</i> (unloaded wage rate + benefits), and the <i>Fully loaded wage rate</i> (loaded wage rate + overhead). Fully loaded wage rates are used to calculate respondent costs. This renewal uses 2019 data.
Unloaded Wage Rate	Wages are estimated for labor types (management, technical, and clerical) within applicable sectors. The Agency uses average wage data for the relevant sectors available in the National Industry-Specific Occupational Employment and Wage Estimates from the Bureau of Labor Statistics (BLS) at http://www.bls.gov/oes/current/oes_nat.htm .
Sectors	The specific North American Industry Classification System (NAICS) code and website for each sector is included in that sector's wage rate table (see Attachment H). Within each sector, the wage data are provided by Standard Occupational Classification (SOC). The SOC system is used by Federal statistical agencies to classify workers into occupational categories for the purpose of collecting, calculating, or disseminating data (see http://www.bls.gov/oes/current/oes_stru.htm).
Loaded Wage Rate	Unless stated otherwise, all benefits represent 45% of unloaded wage rates, based on benefits for all civilian nonfarm workers, from http://www.bls.gov/news.release/ecec.t01.htm . However, if other sectors are listed for which 45% is not applicable, the applicable percentage will be stated.
Fully Loaded	We multiply the loaded wage rate by 50% (EPA guidelines 20-70%) to

Wage Rate	get overhead costs.
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The following tables illustrate the estimated burden and costs associated with the information collection activities of this program.¹ For annual report activities, the estimated average annual cost per participating State or other authorized agency is about \$3,998.35, with the total annual cost for all authorized agencies estimated to be \$240,594.66 (Table 1).

The estimated average annual cost for certifying commercial and private applicators in Indian Country is \$7.02 per respondent, with the total annual cost for all certified applicators estimated to be about \$8,722.19 (Table 2a).

The optional, EPA-administered training course for private applicators in the Federal plan is expected to cost \$ 499.85 per response. Based on 6 private applicators opting for the course, the total annual cost estimates for this activity are \$2,999.11 (Table 2b).

The total annual respondent cost for all commercial applicator recordkeeping of RUP applications in Indian Country is estimated at \$120,377.34 with an average annual per-respondent cost of \$ 128.06 (Table 3).

Recordkeeping of applications by all commercial applicators under State authority has an estimated total annual cost of \$56,662,382.30, based on the commercial applicator count of 442,464, with an average annual per-respondent cost of about \$ 128.06 (Table 4).

The estimated average annual cost per respondent for all RUP dealers in Indian Country to record sales and maintain records is \$ 2.47, with the total annual cost for all 49 RUP dealers estimated to be approximately \$4,716.35. This assumes 39 RUP sales transactions per dealer per year, with 3 minutes required during each transaction, or approximately 95.55 hours per year for the 49 respondents over the course of a year (Table 5a).

Under the Federal certification plan, the agency estimates that a third of the current respondents are either new or have had to submit dealership change information every year. Using the same respondent numbers to forecast for the next three years, with a conservative per-activity burden of 1 hour, and a per-response average annual cost of \$ 49.36 ((49 dealers x 1/3 =16) x wage rate), EPA estimates the total annual cost for this activity at \$789.76 (Table 5b).

For registrants of anthrax-related products, the estimated average annual cost per registrant for training and examination materials is about \$ 1,868.64, with the total annual cost for all registrants estimated to be almost \$3,737.28 (Table 6).

The estimated average annual cost to these respondents for recordkeeping activities is approximately \$ 1,412.48 per registrant, with the total annual cost for all registrants estimated to be about \$2,824.95 (Table 7).

¹ Values are rounded to the nearest two decimal places, and actual column totals may be slightly higher or lower.

Table 1. Average Annual Respondent Burden and Cost Estimates to Authorized Agencies for Annual Reports on Certification and Training Programs

Collection Activities	Annual Burden Hours Per Respondent		TOTALS	
	Tech. \$66.82/hr.	Clerical \$46.04/hr.	Hours	Cost \$
Read/hear rule or any collection instrument instruction (incl. compliance determination)	0.25	0	0.25	16.71
Create information	5	0	5	334.10
Gather information	5	0	5	334.10
Process, compile, review information for accuracy	1	0	1	66.82
Complete written forms or other instruments	0.5	0.5	1	56.43
Record, disclose, display, or report the information	20	45	65	3,408.20
Store, file, or maintain the information	0	0.1	0.1	4.60
TOTAL	31.75	45.6	77.35	4,220.96

TOTAL ANNUAL BURDEN: 77.35 hrs. /respondent x 57 respondents = 4,409 hrs.

TOTAL ANNUAL COST: \$4,220.96/respondent x 57 respondents = \$240,594.66

NAICS codes

State government:

999200

Technical, Life, Physical, and Social Science Occupations:

19-0000

Clerical, Office and Administrative Support Occupations:

43-0000

Table 2a. Certified Applicators in Federal Programs (Indian Country) for Completion of EPA Form to Apply for Certification

Collection Activities	Annual Burden and Cost Per Respondent		
	Tech. Hours \$41.31/hr.	Total Hours	Cost \$
Read/hear rule or any collection instrument instruction (incl. compliance determination)	0.07	0.07	2.89
Complete written forms or other instruments	0.10	0.10	4.13
TOTAL	0.17	0.17	7.02

TOTAL ANNUAL BURDEN: 0.17 hrs. /respondent x 1,242 respondents = 211.14

hrs.

TOTAL ANNUAL COST: \$ 7.02/respondent x 1,242 respondents = \$8,722.19

NAICS code: 37-3012

Pesticide Handlers, Sprayers, and Applicators, Vegetation: 37-3012

Table 2b. Optional Private Applicator Training in Federal Programs (Indian Country)

Collection Activities	Annual Burden and Cost Per Respondent		
	Tech. Hours \$41.31/hr.	Total Hours	Cost \$
Read/hear rule or any collection instrument instruction (incl. compliance determination)	0.07	0.07	2.89
Complete optional EPA-administered training program	12	12	495.72
Complete written forms or other information	0.03	0.03	1.24
TOTAL	12.1	12.1	499.85

TOTAL ANNUAL BURDEN: 12.1 hrs. /respondent x 6 respondents = 72.6 hrs.

TOTAL ANNUAL COST: \$499.85/respondent x 6 respondents = \$2,999.11

NAICS code: 37-3012 Pesticide Handlers, Sprayers, and Applicators, Vegetation

Table 3. Average Annual Respondent Burden and Cost Estimates for Commercial Applicators in Federal Programs (Indian Country) for Recordkeeping for RUP Applications

Collection Activities	Annual Burden and Cost Per Respondent		
	Tech. Hours \$41.31/hr.	Total Hours	Cost \$
Read/hear rule or any collection instrument instruction (incl. compliance determination)	0.2	0.2	8.26
Create information	2	2	82.62
Store, file, or maintain the information	0.9	0.9	37.18
TOTAL	3.1	3.1	128.06

TOTAL ANNUAL BURDEN: 3.1 hrs. /respondent x 940 respondents = 2,914 hrs.

TOTAL ANNUAL COST: \$128.06/respondent x 940 respondents = \$120,377.34

NAICS code: 37-3012 Pesticide Handlers, Sprayers, and Applicators, Vegetation

Table 4. Average Annual Respondent Burden and Cost Estimates for Commercial Applicators and Firms under Authorized Agency Programs for Recordkeeping for RUP Applications

Collection Activities	Annual Burden and Cost Per Respondent		
	Tech. Hours \$41.31/hr.	Total Hours	Cost \$
Read/hear rule or any collection instrument instruction (incl. compliance determination)	0.2	0.2	8.26
Create information	2	2	82.62
Store, file, or maintain the information	0.9	0.9	37.18
TOTAL	3.1	3.1	128.06

TOTAL ANNUAL BURDEN: 3.1 hrs. /respondent x 442,464 respondents = 1,371,638 hrs.

TOTAL ANNUAL COST: \$128.06/respondent x 442,464 respondents = \$56,662,382.30

NAICS code: 37-3012 Pesticide Handlers, Sprayers, and Applicators, Vegetation

Table 5a. Dealers in Federal Programs (Indian Country) for RUP Sales Recordkeeping

Collection Activities	Annual Burden and Cost Per Respondent		
	Tech. Hours \$49.36/hr.	Total Hours	Cost \$
Read/hear rule or any collection instrument instruction (incl. compliance determination)	0.02	0.02	0.99
Create information	0.02	0.02	0.99
Store, file or maintain the information	0.01	0.01	0.49
TOTAL	0.05	0.05	2.47

TOTAL ANNUAL BURDEN: (.05 hrs. /respondent x 49 respondents) x 39 responses per respondent = 95.55 hrs.

TOTAL ANNUAL COST: (\$2.47/respondent x 49 respondents) x 39 responses per respondent = \$4,716.35

NAICS code: 444200 Retail Nursery, Lawn and Garden Supply Stores.

Table 5b. Dealers in Federal Programs (Indian Country) for Reporting Dealerships' Name and Address Changes

Collection Activities	Annual Burden and Cost Per Respondent		
	Tech. Hours \$49.36/hr.	Total Hours	Cost \$
Read/hear rule or any collection instrument instruction (incl. compliance determination)	0.2	0.2	9.87
Create information	0.3	0.3	14.81

Report dealership contact information	0.4	0.4	19.74
Store, file or maintain the information	0.1	0.1	4.94
TOTAL	1	1	49.36

TOTAL ANNUAL BURDEN: 1 hrs. /response x 16 dealers = 16 hrs.

TOTAL ANNUAL COST: \$49.36 /response x 16 respondents = \$789.76

NAICS code: 444200 Retail Nursery, Lawn and Garden Supply Stores.

Anthrax Related Activities

Table 6. Anthrax-related products: Average Annual Respondent (Registrant) Burden and Cost Estimates for Training and Examination Materials

Collection Activities	Annual Burden Hours Per Respondent		TOTALS	
	Tech. \$76.35/ hr.	Clerical \$49.61/hr.	Hours	Cost \$
Read/hear PR Notice (guidance)	0.5	0	0.5	38.18
Develop Training & Examination Materials	20	0	20	1527.00
Review information for accuracy	2	0	2	152.70
Submit training and exam materials to EPA	1	1	2	125.96
Record, store, and file the information	0	0.5	0.5	24.81
TOTAL	23.5	1.5	25	1,868.64

TOTAL ANNUAL BURDEN: 25 hrs. /respondent x 2 respondents = 50 hrs.

TOTAL ANNUAL COST: \$1,868.64 /respondent x 2 respondents = \$3,737.28

Standard Occupational Codes: 325300

Management: 11-0000, Management Occupations

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

Clerical: 43-0000, Office and Administrative Support Occupations

Table 7. Anthrax-related products: Average Annual Respondent (Registrant) Burden and Cost Estimates for Recordkeeping

Collection Activities	Annual Burden and Cost Per Respondent		
	Tech. Hours \$76.35/hr.	Total Hours	Cost \$
Read/hear PR Notice (guidance)	0.5	0.5	38.18
Gather and review information	10	10	763.50
Record, store, and file the information	5	5	381.75
Submit information, only if requested	3	3	229.05
TOTAL	18.5	18.5	1,412.48

TOTAL ANNUAL BURDEN: 18.5 hrs. /respondent x 2 respondents = 37 hrs.
 TOTAL ANNUAL COST: \$1,412.48/respondent x 2 respondents = \$2,824.95

Standard Occupational Codes: 325300
 Management: 11-0000, Management Occupations
 Technical: 19-0000, Life, Physical, and Social Science Occupations
 Clerical: 43-0000, Office and Administrative Support Occupations

C. Estimates of annualized cost to the Federal government

Certification Programs: Based on experience, the Agency has estimated the annual burden to the federal government to review the submissions of annual reports and applications for certification. In addition, starting in February 2014, an optional certification training for private applicators in Indian Country has been provided through EPA-affiliated employees, currently running once a quarter. Each training module takes 12 hours to provide. The Agency’s total regional annual burden associated with the certification of pesticide applicators program is estimated at 1,998.10. The total regional annual cost to the Agency is estimated at \$187,560.21 (Table 8a). The Agency’s total Headquarters annual burden associated with the certification of pesticide applicators program is estimated at 262 hours and the total regional annual cost to the Agency is estimated at \$24,497.00 (Table 8b). The cost of burden has increased to reflect the latest wage labor rates (2019), and the total Agency burden remains the same as the last renewal.

Anthrax-related products: The Agency estimates the annual burden to the Federal government to review the registrants’ training material submissions to be 75 hours. The total annual cost to the Agency for anthrax-related products is estimated at \$7,012.50 (Table 8c).

Total Agency burden: The Agency estimates the total annual burden to the Federal government associated with the certification of pesticide applicators program and anthrax-related products training materials to be 2,335.10. The total annual cost to the Agency for these reviews is \$219,069.71.

Table 8a. Annual Agency Burden and Cost Estimates - Burden to EPA Regional Offices for Indian Country Program and for Processing Annual Reports from Authorized Agencies Prior to Submission to Headquarters

Collection Activities	Mgmt. hours \$132.92/hr.	Tech. hours \$93.50/hr.	Clerical hours \$49.06/hr.	Total Hours	Cost \$
Prepare Regional Reports - for Federal Programs in Indian Country (including collecting	0	1040	0	1040	97,240.00

dealer reports) ²					
Answer respondent questions	7.1	22 8	0	235.1	22,261.73
Audit/review submissions	15	63 8	0	653	61,646.80
Reformat and distribute data	0	5 0	0	50	4,675.00
Store, file, or maintain the information	0	1 7	3	20	1,736.68
TOTAL	22.1	1,97 3	3	1998.1 0	187,560.2 1

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

Table 8b. Annual Agency Burden and Cost Estimates - Burden to Headquarters for Review of Submitted Annual Reports and Administering Training

Collection Activities	Tech. Hours \$93.50/hr.	Cost \$
Administer/provide private applicator training	12	1,122.00
Answer respondent questions	116	10,846.00
Audit/review submissions	93	8,695.50
Reformat and distribute data	29	2,711.50
Store, file, or maintain the information	12	1,122.00
TOTAL	262	24,497.00

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

Table 8c. Annual Agency Burden and Cost Estimates - Burden to Headquarters for Review of Submitted Training and Examination Materials for Anthrax-related Products

Collection Activities	Tech. Hours \$93.50/hr.	Cost \$
Answer respondent questions	3	280. 50
Audit/review submissions	60	5,610.

² The EPA-administered plan for Navajo Country and for the National Indian Country plans are included in Regions' reports.

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Reformat and distribute data	6	561.00
Store, file, or maintain the information	6	561.00
TOTAL	75	7,012.50

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

D. Bottom Line Burden Hours and Cost Table

Table 9. Bottom Line Annual Burden and Cost Table

Respondent		Total Burden Hours	Total Labor Cost (\$)
States (Table 1)		4,408.95	240,594.66
Federal program - certified applicators (Tables 2 and 3)			
	Table 2a	211.14	8,722.19
	Table 2b	72.6	2,999.11
	Table 3	2,914	120,377.34
State-administered programs - commercial applicators (Table 4)		1,371,638	56,662,382.30
RUP dealer burden for recordkeeping of RUP sales (Table 5a)		95.55	4,716.35
RUP dealer burden for reporting informational changes (Table 5b)		16.17	789.76
Anthrax-related products - registrants (Tables 6 and 7)			
	Table 6	50	3,737.28
	Table 7	37	2,824.95
Respondent Total		1,379,443.81	57,047,143.94
Agency		Total Burden Hours	Total Labor Cost (\$)
EPA Regional Offices (Table 8a)		1,998.10	187,560.21
EPA Headquarters (Table 8b)		262	24,497.00
EPA Headquarters – review of registrant training materials for anthrax-related products (Table 8c)		75	7,012.50

Agency Total	2,335.10	219,069.71
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