#### Attachment D

#### APPENDIX I RESPONDENT BURDEN TABLES

It is important note that the numbers in all burden graphs part of this attachment may not sum due to rounding and that the collection activities vary from each information collection (IC). The ICs are grouped based off the previously approved ICR from which they were a part of for the purpose of this consolidation.

#### OMB No. 2070-0040; Experimental Use Permits (EUPs) for Pesticides

IC 1: Respon	IC 1: Response Burden Estimates per EUP Application for Chemical Pesticides						
Collection Activities	Burden Hours		-	Total			
	Management	Technical	Clerical	Harris Casta			
	\$153.45 /hr	\$83.10 /hr	\$57.74 /hr	Hours	Costs		
Read regulations	1.3	1.3		2.5	\$308		
Plan activities		2.5		2.5	\$208		
Create information		3	2	5	\$365		
Gather information		4.3	4	8.3	\$588		
Compile and review	2	6	2	10	\$921		
Complete paperwork	0.3	0.8	2	3.1	\$228		
Store/maintain data		0.5	1	1.5	\$99		
TOTAL BURDEN	3.6	18.3	11	32.8	\$2,717		

Annual Burden IC 1							
Labor categories	Burden Hours	Wage Rate	Number of Submissions				
Management	3.6	\$153.45	8.3				
Technical	18.3	\$83.10	8.3				
Clerical	11	\$57.74	8.3				
Total Annual Costs: \$22,479							

IC 2: Response Burden Estimates per EUP Application for Plant-Incorporated Protectants							
<b>Collection Activities</b>	Burden Hours			Total			
	Management	Technical	Clerical	Hours	Costs		
	\$153.45 /hr	\$83.10 /hr	\$57.74 /hr	nouis	Costs		
Read regulations	2	4	0	6	\$639		
Plan activities	0	20	0	20	\$1,662		
Create information	0	40	4	44	\$3,555		
Gather information	0	6	8	14	\$961		
Compile and review	4	40	4	48	\$4,169		
Complete paperwork	1	8	4	13	\$1,049		
Store/maintain data	0	1	1	2	\$141		
TOTAL BURDEN	7	119	21	147	\$12,176		

	IC 2: Annual Burden		
Labor categories	Burden Hours	Wage Rate	Number of Submitters

Management	7	\$153.45	2
Technical	119	\$83.10	2
Clerical	21	\$57.74	2
Total Annual Costs: \$24,352			

### OMB No. 2070-0142; Plant-Incorporated Protectants; CBI Substantiation and Adverse Effects Reporting

IC 3: Respondent Burden Estimates per Submission for Substantiation of CBI Claims Made in a Plant-Incorporated Protectant Registration Application							
	Burden	and Cost Es	timates	Tota	als		
C-Bestien Asticities	Mgmt.	Tech.	Clerical	Burden	Costs		
Collection Activities	\$153.45/hr	\$83.10/hr	\$57.74 /hr	(hrs)	(\$)		
Read Regulations	1	2	0	3	\$320		
Plan Activities	2	4	0	6	\$639		
Gather Information	0	4	0	4	\$332		
Review Information	2	1	1	4	\$448		
Complete Paperwork	0	1	2	3	\$199		
Submit Information	0.5	0.5	0.5	1.5	\$147		
Totals	5.5	12.5	3.5	21.5	2,085		

IC 3: Annual Burden						
Number of Submissions	Cost per Submission	Total Annual Costs				
24	\$2,085	\$50,036				

IC 4: Average Respondent Burden and Cost Estimates per Submission for Submitting an Adverse Effects Report for an Exempt Plant-Incorporated Protectant							
	Burden and	Cost Estimat	es	Totals			
Collection esticities	Mgmt.	Tech.	Clerical	Burden	Costs		
Collection activities	\$153.45 /hr	\$83.10 /hr	\$57.74 /hr	(hrs)	(\$)		
Read Regulations	0.5	1	0	1.5	\$160		
Plan Activities	0.5	0.5	0	1	\$118		
Gather Information	0	1	0	1	\$83		
Review Information	0.5	0.5	0	1	\$118		
Complete Paperwork	0	0.5	1	1.5	\$99		
Submit Information	0	0.5	0.5	1	\$70		
Cost for Mailing	0	0	0	0	\$0		
Totals	1.5	4	1.5	7	\$649		

IC 4: Annual Burden							
Number of	Burden per Event		Divided over a three-year-period	Total			
Submissions	_						
	Hours	Costs					
1	7		/3	2.3 hours			
1		\$649	/3	\$216			

OMB No. 2070-0060; Application for New and Amended Pesticide Registration

IC 5: Estimated Burden per "Type A" Registration Application						
Collection Activities,		Burden Hours			Total	
Туре А	Mgmt.	Technical	Clerical	Hours	Costs	
	\$153.45/hr	\$83.10/hr	\$57.74/hr	nouis	Costs	
Read Instructions	18	0	0	18	\$2,762	
Plan activities	4	0	0	4	\$614	
Gather/create information	0	120	0	120	\$9,972	
Compile and review	4	8	0	12	\$1,279	
Complete paperwork	0	0	30	30	\$1,732	
Submit information					\$0	
Store/maintain data	0	0	10	10	\$577	
Third party disclosure						
TOTAL	26	128	40	194	\$16,936	

IC 5: Annual Burden by Division for "Type A" Registration Applications								
Labor	AD		AD BPPD		RD		Total	
Category	Hrs.	Cost	Hrs.	Cost	Hours	Cost	Hours	Cost
Management	286	\$43,886	624	\$95,751	4,654	\$714,140	5,564	\$853,777
Technical	1,408	\$117,009	3,072	\$255,293	22,912	\$1,904,063	27,392	\$2,276,366
Clerical	440	\$25,404	960	\$55,426	7,160	\$413,385	8,560	\$494,215
TOTAL	2,134	\$186,299	4,656	\$406,470	34,726	\$3,031,589	41,516	\$3,624,358

IC 6: Estimated Burden per "Type B" Registration Application/Notification							
Collection Activities,	Burden Hours			Total			
Туре В	Mgmt.	Technical	Clerical	Hours	Costs		
	\$153.45/hr	\$83.10/hr	\$57.74/hr	nouis	Costs		
Read Instructions	7	0	0	7	\$1,074		
Plan activities	0.5	0	0	0.5	\$77		
Gather/create information	0	1.5	0	1.5	\$125		
Compile and review	0.5	0.5	0	1	\$118		
Complete paperwork	0	0	3	3	\$173		
Submit information							
Store/maintain data	0	0	1	1	\$58		
Third party disclosure							
TOTAL	8	2	4	14	\$1,625		

IC 6: Annual Burden by Division for "Type B" Registration Applications							
Labor	AD	BPPD	RD	Total			

Category <sup>2</sup>	Hrs.	Cost	Hrs.	Cost	Hrs.	Cost	Hours	Cost
Management	21,360	\$3,277,619	5,304	\$813,881	31,104	\$4,772,802	57,768	\$8,864,302
Technical	5,340	\$443,772	1,326	\$110,195	7,776	\$646,211	14,442	\$1,200,178
Clerical	10,680	\$616,614	2,652	\$153,114	15,552	\$897,901	28,884	\$1,667,629
Total	37,380	\$4,338,005	9,282	\$1,077,19 0	54,432	\$6,316,914	101,094	\$11,732,109

IC 7: Estimated Burden per "Type C" Reduced Risk Registration Application								
Collection Activities,		Burden Hours		7	Total			
Туре С	Mgmt.	Technical	Clerical	Hours	Costs			
	\$153.45/hr	\$83.10/hr	\$57.74/hr	Hours	Costs			
Read Instructions	22	0	0	22	\$3,376			
Gather Information	0	368	0	368	\$30,582			
Process, Compile, and Review Info	80	80	0	160	\$18,924			
Record and Report Info	0	0	72	72	\$4,157			
Store, File, and Maintain Info	0	0	24	24	\$1,386			
TOTAL	102	448	96	646	\$58,424			

IC 7: Annual Burden for "Type C" Reduced Risk Registration Applications							
Labor Catagory <sup>2</sup>		RD					
Labor Category <sup>2</sup>	Hours	Cost					
Management	510	\$78,258					
Technical	2,240	\$186,151					
Clerical	480	\$27,713					
Total	3,230	\$292,122					

	IC 8: Paperwork Burden Hour Estimates from Data Generation for New AIs										
Division Data Cost (\$000s)		Paperwork Cost	Mana	gerial	Tech	nical	Cler	ical	То	tal	
	(\$000S)	(\$000s)	Hours	FTEs	Hours	FTEs	Hours	FTEs	Hours	FTEs	
AD	\$9,382,000	\$3,284,000	4,654	2.2	28,916	13.9	10,467	5	44,038	21.2	
BPPD	\$5,097,000	\$1,784,000	2,528	1.2	15,708	7.6	5,686	2.7	23,923	11.5	
RD	\$9,847,000	\$3,446,000	4,883	2.3	30,343	14.6	10,984	5.3	46,210	22.2	

IC 8: Annual Paperwork Burden Estimates from Data Generation for New AIs						
	Burden per Registration <sup>1</sup>	Average Annual	Average Annual Burden Hours	Average Annual Cost		

		Responses		
Antimicrobial	44,038	3	132,113	\$9,852,000
Biochemical	23,923	18	430,614	\$32,112,000
Conventional	46,210	6	277,260	\$20,676,000
Total	38,057	27	839,987	\$62,640,000

	IC 8: Estimates of Paperwork Burden Hours from Data Generation for New Products									
Districtory	Data	Paperwork	Mana	gerial	Tech	nical	Cler	ical	To	tal
Division	Cost <sup>1</sup>	Cost <sup>1</sup>	Hours	FTEs	Hours	FTEs	Hours	FTEs	Hours	FTEs
AD	\$113,900	\$39,900	56	0.03	346	0.17	125	0.06	527	0.25
BPPD	\$126,700	\$44,300	62	0.03	384	0.18	139	0.07	585	0.28
RD	\$210,700	\$73,700	103	0.05	639	0.31	231	0.11	973	0.47

IC 8:	IC 8: Annual Paperwork Burden Cost Estimates from Data Generation for New Products									
	Burden per Registration Average Annual Responses Hours									
Antimicrobial	527	325	171,270	\$12,967,500						
Biochemical	585	51	29,840	\$2,259,300						
Conventional	973	386	375,734	\$28,448,200						
Total	695	762	576,844	\$43,675,000						

## OMB No. 2070-0182; Pesticide Program Public Sector Collections (FIFRA §18/24(c))

IC 9: FIFRA	IC 9: FIFRA §24(c) Applicant Burden Estimates per Application									
Collection Activities	Burden per Applica	tion (hours)		Total						
	Managerial Technical Clerical		Clerical	Hours	Costs					
	\$153.45 /hr	\$83.10 /hr	\$57.74 /hr							
Gather data	5	12.5	0	17.5	\$1,806					
Submit materials to state	9	5.5	1	15.5	\$1,896					
Store/file/maintain the data	0	1	5	6	\$372					
Totals	14	19	6	39	\$4,074					

IC 9: FIFRA §24(c) Annual Applicant Burden Estimates								
Labor	Burden Hours per	Number of	Total Annual	Labor Rate	Total Annual			
Category	Application	Applications	Hours	(\$/hr.)	Costs			
Managerial	14	223	3,122	\$153.45	\$479,060			
Technical	19	223	4,237	\$83.10	\$352,109			

Clerical	6	223	1,338	\$57.74	\$77,250
Totals	39	223	8,697		\$908,419

IC 9: FIFRA §24(c) Applicant (State Agency) Burden Estimates per Application									
	Burden per Appli	Burden per Application (hours)							
Collection activities	Managerial	Technical	Clerical	Hours	Costs				
	\$105.10	\$71.00	\$49.19						
Compile information	0	1	0	1	\$71				
Review submission information	0	5.5	0	5.5	\$390				
Complete and transmit paperwork to EPA <sup>2</sup>	0	5.4	0.4	5.8	\$403				
Store/file/maintain the data	0	0	0.1	0.1	\$5				
Respond to registrant (if necessary)	0 0.4 0.2		0.2	0.6	\$38				
Totals	0	12.3	0.7	13	\$908				

	IC 9: FIFRA §24(c) Annual Applicant (State Agency) Burden Estimates									
Labor	Burden Hours per	Number of	Total Annual	Labor Rate	Total Annual					
Category	Application	Applications	Hours	(\$/hr.)	Costs					
Managerial	0	223	0	\$105.10	\$0					
Technical	12.3	223	2,743	\$71.00	\$194,740					
Clerical	0.7	223	156	\$49.19	\$7,674					
Totals	13	223	2,899		\$202,414					

	IC 9: FIFRA §24(c) Annual Applicant (Registrant and State Agency) Burden Estimates									
Applicant	Burden Hours per Number of Total Annual Cost per Total An									
	Application	Applications	Hours	Application	Costs					
Registrant	39	223	8,697	\$4,074	\$908,419					
State	13	223	2,899	\$908	\$202,414					
Totals	52	223	11,596	\$4,981	\$1,110,833					

IC 10: FIFRA §18 – Applicant (State Government) Burden Hours and Labor Cost Estimates per Emergency									
Exemption Request									
Collection activities	Collection activities Burden per Application (hours) Total								
	Managerial Technical Clerical				Costs (\$)				
	\$105.10 /hr	\$71.00 /hr	\$49.19 /hr						
Read FIFRA and FQPA requirements and CFR regulations	4	4	0	8	\$704				
Process, compile, and review the	0	74	0	74	\$5,254				

requested data for accuracy and appropriateness					
Generate application correspondence and follow-up summary report	0	15	0	15	\$1,065
Store/maintain/submit information	0	0	2	2	\$98
Totals	4	93	2	99	\$7,121

IC 10: FIFRA	IC 10: FIFRA §18 Annual Applicant (State Government) Burden Hours and Labor Cost Estimates								
Labor Category	Burden Hours per Application	Number of Applications	Total Annual Hours	Labor Rate (\$/hr.)	Total Annual Costs				
Managerial	4	143	572	\$105.10	\$60,118				
Technical	93	143	13299	\$71.00	\$944,168				
Clerical	2	143	286	\$49.19	\$14,069				
Totals	99	143	14,157		\$1,018,355				

### OMB No. 2070-0039; Submission of Unreasonable Adverse Effects Information Under FIFRA 6(a)(2)

I	IC 11: Respondent Burden and Cost Estimates per Submission - Incidents										
	Burden Hours (per	study) by Labor Categ	ory	Total							
Collection Activities	Managerial	Technical	Clerical	Hours	Costs (\$)						
	\$153.45 /hr	\$83.10 /hr	\$57.74 /hr								
Read Instructions	0	0.1	0	0.1	\$8.31						
Create Information	0	0.55	0	0.55	\$45.71						
Compile and Review	0.25	0.6	0	0.85	\$88.22						
Complete Paperwork	0	0	0.55	0.55	\$31.75						
Store and Maintain Data	0	0.12	0.2	0.32	\$21.52						
Total (per incident)	0.25	1.37	0.75	2.37	\$195.51						

IC 11: Annual Respondent Burden and Cost Estimates – Incidents									
Labor Category	Burden	Number of	Total	Labor Rate	Costs (\$)				
	Hours per	Submissions	Annual	(\$/hr)					
	Request		Hours						
Managerial	0.25	107,798	26,950	\$153.45	\$4,135,309				
Technical	1.37	107,798	147,683	\$83.10	\$12,272,968				
Clerical	0.75	107,798	80,849	\$57.74	\$4,667,820				
Total (per year)	2.37	107,798	255,481		\$21,076,096				

IC 12: Respondent Burden Estimates per Submission – Studies									
	Burden Hours (pe	er study) by Labor T	ype	Total					
Collection Activities	Managerial	Technical	Clerical	Hours	Costs (\$)				
	\$153.45	\$83.10	\$57.74						
Read Instructions	0.1	0.2	0	0.3	\$31.97				
Create Information	0	1	0	1	\$83.10				
Compile and Review	0.1	0.55	0	0.65	\$61.05				
Complete Paperwork	0	0.1	0.5	0.6	\$37.18				

Store and Maintain Data	0	0.2	0.5	0.7	\$45.49
Total (per study)	0.2	2.05	1	3.25	\$258.79

IC 12: Annual Respondent Burden Estimates – Studies								
Labor Category	Burden	Number of	Total Annual	Labor Rate (\$/hr)	Costs (\$)			
	Hours per	Submissions	Hours					
	Request							
Managerial	0.2	237	47.4	\$153.45	\$7,273			
Technical	2.05	237	485.85	\$83.10	\$40,376			
Clerical	1	237	237	\$57.74	\$13,683			
Total (per year)	3.25	237	770.25		\$61,332			

	ICs 11 and 12: Annual Respondent Burden Estimates for Studies and Incidents									
	Per Submission Estimates				Totals					
	Burden Hours	Costs (\$)	Expected per Year	Burden Hours	Costs (\$)					
Studies	3.25	\$258.79	237	770.25	\$61,332					
Incidents	2.37	\$195.51	107,798	255,481	\$21,076,096					
Total			108,035	256,252	\$21,137,428					

	IC 13: Registrant Burden Estimates for Training Activities							
	Burden Hou	rs by Labor (	Category	Total (per		Expected	Total Annual Burden and	
			-	activity	<u>(</u> )	Activities	Costs	
Training Activity	Managerial	Technical	Clerica	Hours	Costs	each	Hours	Costs (\$)
			1		(\$)	Year		
	\$153.45	\$83.10	\$57.74					
Plan Training	0.5	0.1	0	0.6	\$85.03	1,452	871	\$123,469
Conduct Employee	0.5	1.5	1	3	\$259.11	14,520	43,560	\$3,762,330
Training					\$259,11		45,500	\$5,702,550
Follow-up,	0	0.1	0.2	0.3	\$19.86	1,452	436	\$28,833
Tracking					\$19.00		430	\$20,033
Total (per year)						17,424	44,867	\$3,914,632

ICs 11, 12, and 13: Studies, Incidents, and Training Annual Respondent Burden				
Collection activities	Total Submissions or Activities	Totals		
	each Year	Hours	Costs (\$)	
Studies	237	770.25	\$61,332	
Incidents	107,798	255,481	\$21,076,096	
Training Activities	17,424	44,867	\$3,914,632	
Total (per year)	125,459	301,118	\$25,052,060	

#### OMB No. 2070-0052; Compliance Requirement for Child Resistant Packaging

IC 14: CRP Certification with Data, Estimated Respondent Burden					
	Burden Hours			Totals	
Collection activities	Managerial	Technical	Clerical	Burden	Cost
	\$153.45 /hr	\$83.10 /hr	\$57.74 /hr	Hours	
Read instructions	0	0.25	0	0.25	\$20.78
Plan activities	0	0.5	0	0.5	\$41.55
Gather CRP certification	0	0.25	0	0.25	\$20.78

information					
Generate & gather CRE/SAUE	13	72	28	113	\$9,594.83
study data & prepare final report					\$9,394.05
Process, compile, and complete	0	1.5	0.5	2	\$153.52
certification package					\$155.52
Review submission	0	0.5	0.5	1	\$70.42
Submit, file, or maintain CRP	0	0	1	1	
certification package and					\$57.74
CRE/SAUE study final report					J0/./4
with data					
TOTAL	13	75	30	118	\$9,960

IC 14: Annual Burden CRP Certification with Data				
Burden Number of responses Total				
118 Hours	17	2,006 hours		
\$9,960 \$169,313				

IC 14: CRP Certification Without Data, Estimated Respondent Burden					
	Burden Hours			Totals	
Collection activities	Managerial	Technical	Clerical	Burden Hours	Cost
	\$153.45 /hr	\$83.10 /hr	\$57.74 /hr		
Read instructions	0	0.25	0	0.25	\$20.78
Plan activities	0	0.5	0	0.5	\$41.55
Gather CRP certification information	0	0.25	0	0.25	\$20.78
Generate or obtain CRE/SAUE study data & final report	13	72	28	113	\$9,594.83
Process, compile, and complete certification package	0	1.5	0	1.5	\$124.65
Review submission	0	0.5	0.5	1	\$70.42
Submit CRP certification package; file or maintain package and CRE/SAUE study final report with data	0	0	0.5	0.5	\$28.87
TOTAL	13	75	29	117	\$9,902

IC 14: Annual Burden CRP Certification without Data			
Burden	Number of responses	Total	
117 Hours	13	1,521 hours	
9,902 \$128,724			

IC 14: CRP Exemption Request, Estimated Respondent Burden				
Burden Hours Totals				
Collection activities	Technical	Clerical	Burden	Cost
	\$83.10 /hr	\$57.74 /hr	Hours	-
Read instructions	0.25	0	0.25	\$20.78
Plan activities	0.5	0	0.5	\$41.55
Create information including electronic format of data	0.25	0	0.25	\$20.78

Gather Data to support Exemption	2.5	0	2.5	\$207.76
Process, compile, and complete written compliance document	2	0.5	2.5	\$195.07
Review submission	0.5	0.5	1	\$70.42
Store, submit, file, or maintain data	0	1	1	\$57.74
TOTAL	6	2	8	\$614.09

IC 14: Annual Burden CRP Exemption Request				
Burden	Number of responses	Total		
8 Hours	1	8 hours		
\$614 \$614				

IC 14: Estimated Annual Respondent Burden				
Type of Response	Total Annual Burden Hours	Total Annual Cost		
CRP certification with data	2,006	\$169,313		
CRP certification without data	1,521	\$128,724		
CRP exemption request	8	\$614		
Total	3,535	\$298,652		

IC 14: Average Burden per Response				
Total BurdenNumber of responsesBurden per Response				
3,535 hours 31		114 hours		
\$298,652 \$9,634				

# OMB No. 2070-0044; Notice of Supplemental Distribution of a Registered Pesticide Product

IC 15: Estimated Respondent Burden per Supplemental Distribution Application						
	Burden Hours	Total				
Collection Activities	Managerial, \$/hr Technical, \$/hr Clerical, \$/hr				Costs	
	\$153.45	\$83.10	\$57.74			
Read instructions	0.08			0.08	\$12.28	
Process, compile, review information for accuracy and appropriateness	0.05			0.05	\$7.67	

If necessary, obtain an EPA company number for the supplemental distributor			0.08	0.08	\$4.62
Complete and submit EPA Form 8570- 5	0.03			0.03	\$4.60
Store, file, or maintain information			0.08	0.08	\$4.62
Total	0.16	0	0.16	0.32	\$33.79

IC 15: Average Annual Burden				
Burden	Number of responses	Total		
0.32 hours	1,885	603 hours		
\$33.74		\$63,692		

### OMB No. 2070-0024; Tolerance Petitions for Pesticides on Food/Feed Crops and New Inert Ingredients

IC 16: Petitioner Burden Estimates Per Response						
Collection activities	Burden Hours				Costs	
					(per petition)	
	Managerial, \$/hr	Technical, \$/hr	Clerical , \$/hr	Total Hours		
	\$209.90	\$107.54	\$66.10		Total Costs	
Review FFDCA regulations CFR citation; PRN 97-1	25	48	24	97	\$11,996	
Conduct Field Trial	252	1,080	25	1357	\$170,687	
Prepare Petition	42	30	116	188	\$19,710	
Read Notice of any petition deficiency	1	1	1	3	\$384	
Prepare response	2	44	12	58	\$5,945	
Maintain information	1	8	14	23	\$1,996	
TOTAL BURDEN	323	1,211	192	1,726	\$210,716.28	

IC 16: Annual Burden					
Labor categories	Burden Hours	Wage Rate	Number of Submitters	Total	
Management	323	\$209.90	139	\$9,423,855	
Technical	1,211	\$107.54	139	\$18,101,513	
Clerical	192	\$66.10	139	\$1,764,195	
Total Annual Costs: \$29,289,563					

IC 17: IR-4 Burden Estimates Per Petition Per Response						
Collection activities	Burden Hours				Costs	
					(per petition)	
	Managerial, \$/hr	Technical, \$/hr	Clerical,	Total		
			\$/hr	Hours		
	\$172.16	\$91.02	\$49.87		Total Costs	
Review FFDCA regulations CFR citation; PRN 97-1	25	48	24	97	\$9,870	
Conduct Field Trial	252	1,080	25	1357	\$142,929	
Prepare Petition	55	30	116	201	\$17,984	
Read Notice of any petition	1	1	1	3	\$313	

deficiency					
Prepare response	2	44	12	58	\$4,947
Maintain information	1	8	14	23	\$1,598
TOTAL BURDEN	336	1,211	192	1,739	\$177,641

IC 17: Annual Burden						
Labor categories	Burden Hours	Wage Rate	Number of Submitters	Total		
Management	336	\$150.08	26	\$1,504,014		
Technical	1,211	\$75.75	26	\$2,865,725		
Clerical	192	\$41.52	26	\$248,933		
Total Annual Costs: \$4,618,671						