**Attachment E**

**APPENDIX J**

**AGENCY 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**

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|  | ICs 1 and 2: Annual Burden |  |
| Labor Categories  | Burden Hours | Wage Rate |
| Management  | 215 | $143.95  |
| Technical | 1,631 | $95.49  |
| Clerical | 76 | $53.00  |
| Total Annual Burden Hours: 1,922 |  |  |
| Total Annual Costs: $190,727 |  |  |

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

|  |  |
| --- | --- |
| IC 3: Average Agency Burden Estimates per Submission for EPA Activities related to CBI Substantiation |   |
|   | Burden Hours | Total |
| Activities | Managerial | Technical | Clerical | Burden (hrs) | Costs |
| $143.95 /hr | $95.49 /hr | $53.00 /hr | ($) |
| Consult with Registrant  | 1 | 3 | 0.5 | 4.5 | $457  |
| Record Submissions | 0 | 0.5 | 1 | 1.5 | $101  |
| Review Submissions | 1 | 2 | 0 | 3 | $335  |
| Store the Information | 0 | 0.5 | 1 | 1.5 | $101  |
| Totals | 2 | 6 | 2.5 | 10.5 | $993  |

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|  | IC 3: Annual Agency Burden EPA Activities related to CBI Substantiation |
| Number of Submissions | Burden per Event |  | Total |
|  | Hours | Costs |  |
| 24 | 10.5 |  | 252 hours |
| 24 |  | $993 | $23,840 |

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| --- | --- | --- |
|  | IC 4: Agency Burden per Submission for EPA Activities related to an Adverse Effects Report Submitted for an Exempt Plant-Incorporated Protectant |  |
| Activities | Burden Hours | Totals |
|   | Managerial | Technical | Clerical | Burden | Costs |
|   | $143.95 /hr | $95.49 /hr | $53.00 /hr | (hrs) | ($) |
| Consult with Registrant | 0.5 | 1 | 0.5 | 2 | $194  |
| Record Submissions | 0 | 0.5 | 1 | 1.5 | $101  |
| Review Submissions | 1 | 1 | 0 | 2 | $239  |
| Store the Information | 0 | 0.5 | 0.5 | 1 | $74  |
| Totals | 1.5 | 3 | 2 | 6.5 | $608  |

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|  | IC 4: Annual Agency Burden Activities related to an Adverse Effects Report Submitted for an Exempt Plant-Incorporated Protectant |  |  |  |
| Number of Submissions | Burden per Event |  | Divided over a three-year-period | Total |
|  | Hours | Costs |  |  |
| 1 | 6.5 |  | /3 | 2.2 hours |
| 1 |  | $608 | /3 | $203 |

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|  |  | ICs 3 and 4: Annual Agency Burden |  |
|   | Per Submission Estimates | Total Submissions | Totals |
| Burden | Costs | Expected each year | Burden | Costs |
| (hrs) | ($) |   | (hrs) | ($) |
| CBI Substantiation | 10.5 | $993  | 24 | 252 | $23,840  |
| Adverse Effects Reporting | 6.5 | $608  | 0.3 | 2.2 | $203  |
| Totals |   |   |   | 254.2 | $24,043  |

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

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  |  |  |  | ICs 5, 6, and 7: Distribution of Agency FTEs Supporting FIFRA Section 3 Registration Activities |  |  |  |  |  |
|  Labor categories | BEAD | RD | EFED | HED | AD | BPPD | Total FTEs | Hourly wage | Total Annual Cost |
| Managerial | 1.8 | 8.7 | 3.7 | 5.3 | 3.2 | 1.6 | 24 | $143.95  | $7,185,844  |
| Technical | 8.9 | 49.3 | 14.7 | 28.5 | 20.9 | 24.1 | 146 | $95.49  | $28,999,561  |
| Clerical | 0.5 | 2.4 | 1.1 | 1.1 | 1.1 | 0.7 | 7 | $53.00  | $771,630  |
| Total | 11.2 | 60.4 | 19.4 | 34.9 | 25.2 | 26.4 | 177 |   | $36,957,035  |

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|  | IC 8: Estimated Annual Hours and Cost |
|   | Annual Total |
| Responses | Hours | Costs |
| Data Generation | 790 | 1,440,754 | $108,099,000 |
| New AIs | 28 | 863,910 | $64,424,000  |
| New Products | 762 | 576,844 | $43,675,000  |
| Total Agency Burden |   | 369,127 | $36,957,035 |

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

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| --- | --- | --- | --- | --- | --- | --- |
|  |  |  |  | IC 9: Total Annual Agency Burden for Section 24(c) Activities |  |  |
| Labor categories  | FTEs | Hours / FTE | Total burden hours | Fully loaded wage rates ($/hr.)  | Annual per FTE cost | Total Cost |
| Managerial | 1 | 2080 | 2,080 | $143.95  | $299,410  | $264,306  |
| Technical | 2 | 2080 | 4,160 | $95.49  | $198,627  | $397,254  |
| Clerical | 1 | 2080 | 2,080 | $53.00  | $110,233  | $98,051  |
| Totals | 4 | 2080 | 8,320 |   |   | $759,611  |

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|  |  |  | IC 10: Annual Agency Burden for Section 18 Activities |  |  |  |
| Labor categories  | FTEs  | Hours / FTE | Total burden hours | Fully loaded wage rates ($/hr.)  | Annual per FTE cost | Total Cost |
| Managerial | 1 | 2,080 | 2,080 | $143.95  | $299,410  | $264,306  |
| Technical | 5 | 2,080 | 10,400 | $95.49  | $198,627  | $993,136  |
| Clerical | 1 | 2,080 | 2,080 | $53.00  | $110,233  | $98,051  |
| Totals | 7 | 2,080 | 14,560 |   |   | $1,355,493  |

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

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| --- |
| IC 11: Agency Burden per Submission - Incidents |
| Collection Activities | Burden Hours per Submission by Labor Category | Total |
| Managerial | Technical | Clerical  | Hours | Costs ($) |
| $143.95  | $95.49  | $53.00 |
| Screen Submitted Information | 0 | 0.135 | 0 | 0.135 | $12.89  |
| Record, File and Track Submissions | 0 | 0.023 | 0.033 | 0.056 | $3.95  |
| Communications, Guidance | 0 | 0.025 | 0 | 0.191 | $2.39  |
| Total (per incident) | 0 | 0.183 | 0.033 | 0.216 | $19.22  |

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| IC 11: Annual Agency Burden Estimates - Incidents |
| Labor Category | Burden Hours per Request | Number of Submissions | Total Annual Hours | Labor Rate ($/hr) | Costs ($) |
| Managerial | 0 | 107,798 | 0 | $143.95  | $0  |
| Technical | 0.183 | 107,798 | 19,727 | $95.49  | $1,883,810  |
| Clerical | 0.033 | 107,798 | 3,557 | $53.00  | $188,526  |
| Total (per year) | 0.216 | 107,798 | 23,284 |   | $2,072,336  |

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| IC 12: Agency Burden Estimates per Submission - Studies |
| Collection Activities | Burden Hours per Submission by Labor Category | Total |
| Managerial | Technical | Clerical  | Hours | Costs ($) |
| $143.95  | $95.49  | $53.00  |
| Screen submitted information | 0 | 2 | 0 | 2 | $190.99  |
| Record, file, and track submissions | 0 | 3.6 | 0.9 | 4.5 | $391.47  |
| Total (per study) | 0 | 5.6 | 0.9 | 6.5 | $582.46  |

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| IC 12: Annual Agency Burden Estimates - Studies |
| Labor Category | Burden Hours per Request | Number of Submissions | Total Annual Hours | Labor Rate ($/hr) | Costs ($) |
| Managerial | 0 | 237 | 0 | $143.95  | $0  |
| Technical | 5.6 | 237 | 1327.2 | $95.49  | $126,739  |
| Clerical | 0.9 | 237 | 213.3 | $53.00  | $11,304  |
| Total (per year) | 6.5 | 237 | 1,541 |   | $138,044  |

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| ICs 11 and 12: Annual Agency Burden and Cost Estimates |
|   | Per Submission Estimates | Total Submissions Expected per Year | Totals |
|   | Hours | Costs ($) | Burden Hours | Costs ($) |
| Studies | 6.5 | $582.46  | 237 | 1,541 | $138,044  |
| Incidents | 0.216 | $16.82  | 107,798 | 23,284 | $2,072,336  |
| Total (per year) |   |   | 108,035 | 24,825 | $2,210,380  |

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

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| --- | --- | --- | --- |
|  |  | IC 14: Agency Burden by Response Type |  |
|  Collection activities  | CRP certification with data | CRP certification without data  | Exemption Request |
| Technical $/hr | Clerical $/hr | Technical $/hr | Clerical $/hr | Technical $/hr | Clerical $/hr |
|   |
|   | $95.49  | $53.00  | $95.49  | $53.00  | $95.49  | $53.00  |
| Hours per response, by labor type  | 8 | 3 | 1.5 | 0.5 | 40 | 3 |
| Cost per response, by labor type | $764  | $159  | $143  | $26  | $3,820  | $159  |
| Annual number of responses | 17 | 13 | 1 |
| Cost per response, by response type | $923  | $170  | $3,979  |
| Total Annual Cost | $15,690  | $2,207  | $3,979  |

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| --- | --- | --- |
|  | IC 14: Total Annual Burden |  |
| Agency Burden | Total Burden Hours | Total Cost ($) |
| CRP certification with data | 187 | $15,690  |
| CRP certification without data | 26 | $2,207  |
| CRP Exemption Request | 43 | $3,979  |
| Total Agency Burden and Cost | 256 | $21,875  |

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

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| --- | --- | --- |
|  | IC 15: Estimated Agency Burden per Supplemental Distribution Application |  |
| AGENCY | Burden Hours | Totals |
| Collection Activities | Managerial, $/hr | Technical, $/hr | Clerical, $/hr | Hours | Costs |
| $143.95  | $95.49  | $53.00  |
| If necessary, assign an EPA company number to the supplemental distributor. |   |   | 0.08 | 0.08 | $4.24  |
| Verify, acknowledge receipt |   |   | 0.03 | 0.03 | $1.59  |
| •         Initial product screening |   | 0.36 |   | 0.36 | $34.38  |
| •         Product review meeting | 0.63 |   |   | 0.63 | $90.69  |
| •         Process disapproved product distribution information |   | 0.42 |   | 0.42 | $40.11  |
| Process: Enter form information into electronic file in OPPIN |   | 0.5 |   | 0.5 | $47.75  |
| File and maintain information |   | 0.02 |   | 0.02 | $1.91  |
| Total | 0.63 | 1.3 | 0.11 | 2.04 | $69.18  |

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| IC 15: Total Annual Agency Burden |
| Total |
| Hours | Costs |
| 1260 | $130,399  |

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

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| --- | --- | --- | --- |
|  | IC 16 and 17: Cost per Employee |  |  |
| Labor categories  | Burden Hours | Wage Rate | Total |
| Managerial  | 2,080 | $143.95  | $299,410.16  |
| Technical | 2,080 | $95.49  | $198,627.13  |
| Clerical | 2,080 | $53.00  | $110,232.86  |

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| --- | --- | --- |
|  | IC 16 and 17: Total Agency Costs |  |
| Labor categories  | Burden Hours | Cost per Labor Category  |
| Managerial  | 1.572 | $470,672.77  |
| Technical | 14.256 | $2,831,628.33  |
| Clerical | 0.432 | $47,620.59  |
| Total: $3,349,922 |  |  |

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| --- | --- |
| IC 16 and 17: Total Agency Burden hours |  |
| Labor categories  | Burden Hours | Total Burden Hours |
| Managerial  | 1.572 | 2,080 |
| Technical | 14.256 | 2,080 |
| Clerical | 0.432 | 2,080 |
| Total: 33,821 |  |  |