

SUPPORTING STATEMENT - PART A

Statement of Intent – OMB No. 0704-0534

Summary of Changes from Previously Approved Collection

- DD Form 2537, “Pre-Award/Post-Award On-Site Review” (formerly DRMS 2006) is no longer used as a part of the award process.
- Due to the removal of DD Form 2537, the labor cost of respondent burden is reduced as well as the labor cost to the Federal government.

1. Need for the Information Collection

This collection allows the Department of Defense (DoD) and its representatives to assess the ability of prospective purchasers to comply with The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), CFR Title 40, Protection of Environment, CFR Title 49, Transportation, and CFR Title 29, Labor before the sale of materiel. Defense Logistics Agency (DLA) Form 2536, “Statement of Intent” (formerly DRMS 1645), are used to identify the nature of the purchaser’s business, where the materials will be stored, and what the buyer’s intentions are with the materiel (i.e., use the materiel as intended, re-sell to others, scrap the materiel for recovery of contents, or re-refine or re-process the materiel).

2. Use of the Information

Information collected on DLA Form 2536 is used by the Defense Logistics Agency (DLA) Disposition Services, Defense Contract Management Agency (DCMA), and the military services for transfers of hazardous and dangerous property to parties outside of DoD control. The form is available on the DLA website ([DLA Forms List](#)). All individuals or business attempting to purchase DoD property are provided DLA Form 2536 (via email). This form serves as a bid for DoD property and are used to ensure the bidder’s eligibility to conduct business with the government.

Once an Apparent High Bidder (AHB) has been identified for a sale, the DLA Disposition Services Sales Contracting Office Sales Officer will send DLA Form 2536 to the AHB through email. The form is filled out electronically as a fillable form and done so to capture, business and contact information for the AHB and business and contact information for the Destination Facility in which the AHB intends to use for processing the awarded commodity.

The DLA Form 2536 is used to identify permitting requirements, processes used by the destination facility, and relationship between the AHB and Destination Facility. Experience with similar sales and requirements of the sale are recorded. The AHB will fill out and return the DLA Form 2536 via email. Once received by Disposition Services Sales Contracting Office, the form will be submitted to the DLA Disposition Services

Environmental Office Vetting Team for review and will be used to conduct an Environmental Responsibility Determination of the AHB and destination facility listed.

The Disposition Services Sales Contracting Officer may use the bidder's failure to provide complete or accurate information on this basis to deny the award. The DLA Sales Contracting Office will use DLA Form 2536 to complete semiannual reporting until the contract has been satisfied or terminated.

3. Use of Information Technology

100% electronic response is required. All responses are sent and received through DLA's Outlook email system. Failure to respond will result in no award of contract.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

This collection of information is provided by respondents on an as-needed basis to facilitate appropriate clearance checks. Release of DoD property without these clearance checks poses a risk to national security, as individuals and countries whose interests counter those of the United States target property for military utility and value. These concerns were established because of both Congressional hearings and numerous investigations which led to seizures conducted by the U.S. Customs Service, Federal Bureau of Investigation, Defense Criminal Investigative Service, and U.S. Attorney General task forces. These forms address Congressional, General Accounting Office, and DoD Inspector General findings.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice for the collection published on Friday, October 11, 2024. The 60-Day FRN citation is 89 FRN 82593.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Friday, January 10, 2025. The 30-Day FRN citation is 90 FR 1985.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is not required for this collection because we are not requesting individuals to furnish personal information for a system of records.

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

The record series and retention for this collection of information is 5000.92, "Hazardous Waste Service Contracts: Contracting Officer Copy." Records are to be destroyed after 50 years.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

[DLA Form 2536]

- a) Number of Respondents: 102
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 102
- d) Response Time: 90 minutes
- e) Respondent Burden Hours 153 hours

2) Total Submission Burden

- a) Total Number of Respondents: 102
- b) Total Number of Annual Responses: 102
- c) Total Respondent Burden Hours: 153 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
[DLA Form 2536]
 - a) Number of Total Annual Responses: 102
 - b) Response Time: 1.5 hours
 - c) Respondent Hourly Wage: \$35.13
 - d) Labor Burden per Response: \$52.70
 - e) Total Labor Burden: \$53,745
- 2) Overall, Labor Burden
 - a) Total Number of Annual Responses: 102
 - b) Total Labor Burden: \$5,375

The Respondent hourly wage was determined by using the U.S. Bureau of Labor Statistics website: https://www.bls.gov/oes/current/oes_nat.htm#11-0000.

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) Collection Instrument(s)
[DLA Form 2536]
 - a) Number of Total Annual Responses: 102
 - b) Processing Time per Response: 1.5 hours
 - c) Hourly Wage of Worker(s) Processing Response: \$36.86
 - d) Cost to Process Each Response: \$55.29
 - e) Total Cost to Process Responses: \$5,640
- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 102
 - b) Total Labor Burden: \$5639.58

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$ 0
 - b) Printing: \$ 0
 - c) Postage: \$ 0
 - d) Software Purchases: \$ 0
 - e) Licensing Costs: \$ 0

- f) Other (Site visits): \$1050.00
- 2) Total Operational and Maintenance Cost: \$ 1050.00

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$5,640
- 2) Total Operational and Maintenance Costs: \$ 1,050
- 3) Total Cost to the Federal Government \$ \$6,690

The Federal Government Hourly Wage was determined using the 2024 OPM GS scale.
https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/GS_h.pdf

15. Reasons for Change in Burden

The burden has decreased since the previous approval due to the removal of the DD 2537.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.