

ATTACHMENT E

Calculation of Respondent & Agency Burden Associated with the Certification of Pesticide Applicators (40 CF 171) – Hours and Costs

A. Estimating Respondent Burden

The following tables present the estimated number of respondents and/or responses, by activity, and the burden hours and costs associated with the information collection activities of the Certification of Pesticide Applicators (CPA) program (40 CFR 171).

Respondents, including individuals and entities, for this ICR include

- Certifying authorities with EPA-approved applicator certification plans. There are a total of 66 certifying authorities: 50 states; 5 U.S. territories, including the District of Columbia; 5 tribes, and 5 federal agencies, not including EPA.
- Certified applicators (both private and commercial). Based on data submitted by certifying authorities, EPA estimates there to be 364,291 private applicators and 449,014 commercial applicators. Of which, there are 657 applicators (414 commercial and 243 private applicators) who have applied for certification in Indian Country using a current RUP certification from another jurisdiction, and another 45 private applicators who take the optional private applicator training to become certified under the EPA-administered program in Indian Country.
- Non-certified applicators working under the supervision of certified applicators. EPA estimates that there are 918,892 non-certified applicators working under the supervision of commercial applicators, assuming an average of three per certified applicator. EPA estimates that there are 28,092 non-certified applicators working under the supervision of private applicators based on the number of farms that are likely to employ an applicator considering the type of farm (primarily large fruit and vegetable farms).
- Pesticide dealers. EPA estimates that there are 17,226 retail establishments that sell RUPs, including 39 based in Indian Country.

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 U.S. Bureau of Labor Statistics. The formulas used to estimate the labor rates and formulas used to derive the fully loaded rates are listed in Attachment F.

Methodology	The methodology uses data on each sector and labor type for an Unloaded wage rate (hourly wage rate) and calculates the Loaded wage rate (unloaded wage rate + benefits), and the Fully loaded wage rate (loaded wage rate + overhead). Fully loaded wage rates are used to calculate respondent costs. This renewal uses 2024 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 45.14% 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 Wage Rate	We multiply the loaded wage rate by 50% (EPA guidelines 20-70%) to get overhead costs.

(i) *Burden and Costs Due to Updating Certification Plans and Programs under the 2017 Certification of Pesticide Applicator (CPA) Rule Requirements*

1. *Rule Familiarization*

EPA revised the CPA rule in 2017 and certifying authorities have subsequently been revising programs to meet the new standards. Private and commercial certified applicators and pesticide dealers must also maintain awareness of changes occurring. The estimated average annual burden in terms of hours and cost for respondents to familiarize themselves with the new rule changes varies by respondent. The estimates are reported as 3-year averages; the EPA assumes that the respondents will spend more time in the first year to fully familiarize themselves with the revised requirements for the certification programs. The total annual burden for all respondents to familiarize themselves with the new rule is estimated to be 207,699 hours and the total cost is \$15,187,681 per year (Table 1).

This ICR renewal is now in its third renewal cycle since the 2017 CPA Rule and therefore, the Agency assumes that the three-year average per event burden hour in Table 1 for each respondent group are as follows:

- Certifying authorities with EPA-approved applicator certification plans (includes 50 state, District of Columbia, 5 U.S. territory, 5 tribal, and 5 federal agency plans). In 2022, the Agency estimated that the certifying authorities initially spent 2 hours annually in previous versions of this ICR to familiarize themselves with the revised regulation. EPA now estimates that certifying authorities will spend less time, approximately 1 hour annually, as they become more familiar with the requirements of the regulation.
- Certified applicators (both private and commercial). Certified applicators are assumed to

review only the requirements for certified applicators. In 2022, the Agency estimated that certified applicators initially spent 30 minutes annually in previous versions of this ICR to familiarize themselves with the revised regulation. EPA now estimates that certified applicators will spend less time, approximately 15 minutes annually, as they become more familiar with the requirements of the regulation.

- RUP dealers. RUP dealers are assumed to review only the requirements for dealers. In 2022, the Agency estimated that RUP dealers initially spent 30 minutes annually in previous versions of this ICR to familiarize themselves with the revised regulation. EPA now estimates that RUP dealers will spend less time, approximately 15 minutes annually, as they become more familiar with the requirements of the regulation.

Table 1. Burden of Rule Familiarization for Certifying Authorities, Certified Applicators, and RUP Dealers*

Respondent Group	Respondent Count	Response Count	Fully Loaded Wage Rate ^a	Per Event Average		Totals	
				Burden (hours)	Cost (\$)	Burden (hours)	Cost (\$)
Certifying Authorities ^b	66	66	\$116.93	1	\$116.93	66	\$7,718
Private Applicators ^c	364,291	364,291	\$104.61	0.25	\$26.15	91,073	\$9,527,193
Commercial Applicators ^d	449,014	449,014	\$48.20	0.25	\$12.05	112,254	\$5,410,788
RUP Dealers ^e	17,226	17,226	\$56.19	0.25	\$14.05	4,306	\$241,982
Totals	830,597	830,597				207,699	\$15,187,681

Source: EPA estimates of respondents and responses; wage rates from 2024 (BLS updated 2025).

*The collection activity is rule-familiarization. Estimates may not add due to rounding. Respondents (Certifying Authorities, certified applicators and RUP dealers) are counted only once.

^a Includes benefits and overhead costs per hour. Units are in dollars per hour.

^b State governments, NAICS 999200; SOC Management 11-0000

^c Farmers and Ranchers, NAICS 115000; SOC Agricultural Managers 11-9013

^d Pesticide Handlers and Applicators, NAICS 115000; SOC 37-3012

^e Equipment and Supplies Retailers, NAICS 444200; SOC Sales Managers 41-1011

2. Annual Respondent Burden and Cost Estimates to Revise/Modify and Submit Certification Plans to EPA for Review and Approval

On an as-needed basis, certifying authorities with approved certification plans may need to modify and submit their certification plans to follow the regulations as revised by the CPA regulations.

In order to implement the approved certification plans, the laws and regulations relevant to the certification plans may need to be revised on occasion, and the processes and policies needed to implement certification programs may require modification to plans as certifying authorities progress through the implementation phase. The Agency assumes that all certifying authorities with EPA-approved certification plans will need to make at least one modification per year for the next 3 years. For each state and territory plan (including D.C.), EPA estimates approximately

1,250 hours per year or about the equivalent of a single full-time employee dedicating 60% of their time for a year (2080 hours as full-time for a year) will be necessary to make legislative and regulatory revisions and to develop the modified certification plan. This is an estimated burden reduction of 75% compared to the previous ICR, as the modification paperwork process is expected to be less labor intensive and on a more limited scale compared to the previous phase requiring full certification plan revisions. The Agency estimates that submitting each plan to the EPA for review and approval would take 8 hours per plan. Certifying authorities will also need to update their databases to track the certification status of applicators, which EPA estimates to cost about \$69,000 a year, which is the average annual cost per jurisdiction (Table 2a).

For states, territories, and D.C., the total annual burden is estimated to be 119,560 hours and the total annual cost is \$9,591,542.

State TOTAL ANNUAL BURDEN: 2,135 hours/respondent x 56 respondents = **119,560 hrs.**

State TOTAL ANNUAL COST: \$171,278/respondent x 56 respondents = **\$9,591,542**

Table 2a. Burden per Authority (States and Territories) to Revise Regulations and/or Modify Certification Plans and Update Databases*

Collection Activities	Annual Burden Hours Per Respondent			TOTALS	
	Managerial	Technical	Clerical	Hours	Cost \$
	\$116.93/hr	\$78.44 /hr	\$55.17/hr		
Revise State Regulations and/or Modify Plans	250	750	250	1250	\$101,857
Submit Plans	0	8	0	8	\$628
Update Database	0	877	0	877	\$68,793
TOTAL	250	1,635	250	2,135	\$171,278

Source: EPA estimates; wages from BLS (2024).

*Estimates may not add due to rounding. There is one response per respondent.

Fully loaded wages based on NAICS Code: 999200, State governments, and Standard Occupational Codes

Managerial: 11-0000; Management Occupations

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

Clerical: 43-0000; Office and Administrative Support Occupations

The Agency estimated less burden for the remaining 10 certifying authorities (tribes and federal agencies) to revise their certification plans, because the number of certified applicators in each of them is small. In addition, federal agencies and most tribes will not have to make legislative or regulatory changes, and thus, EPA estimates these certifying authorities will spend on average, 28 hours to modify their certification plans. In terms of the cost to update their databases, these 10 certifying authorities have an average annual burden per respondent of 72 hours at a cost of about \$7,719 a year (Table 2b).

Generally, EPA estimates a burden reduction of 75% to modify federal and tribal agency certification plans compared to the previous ICR, as the modification paperwork process is expected to be less labor intensive and on a more limited scale compared to the previous phase

requiring full certification plan revisions.

For the 10 federal agencies and tribes authorized to certify applicators, the total annual burden is estimated to be 720 hours, and the total annual cost is \$77,195.

Respondent TOTAL ANNUAL BURDEN: 72 hours/respondent x 10 respondents = **720 hrs.**

Respondent TOTAL ANNUAL COST: \$7,719/respondent x 10 respondents = **\$77,194.64**

Table 2b. Burden to Federal Agencies and Tribes Authorized to Certify Applicators to Modify, Submit Certification Plans and Update Databases*

Collection Activities	Annual Burden Hours Per Respondent			TOTALS	
	Managerial	Technical	Clerical	Hours	Cost
	\$160.15/hr	\$106.92/hr	\$59.02/hr		\$
Revise Agency Regulations and Plans	4	12	4	20	\$2,160
Submit Plans	0	8	0	8	\$855
Update Database	0	44	0	44	\$4,704
TOTAL	4	64	4	72	\$7,719

Source: EPA estimates; wages from BLS (2024).

*Estimates may not add due to rounding. Respondents (federal agencies, D.C., territories and tribes) are counted only once.

NAICS Code: 9991000

Management: 11-0000; Management Occupations

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

Clerical: 43-0000; Office and Administrative Support Occupations

(ii) Burden to Certifying Authorities Associated with Reporting on Certification and Training Programs

For annual report activities, the estimated average annual burden and cost per certifying authority is about 77.35 hours and \$5,006. This represents the burden to certifying authorities for complying with reporting requirements associated with certification and training programs. The total annual burden and cost for all certifying authorities is estimated to be 5,105 hours and \$330,409 (Table 3).

TOTAL ANNUAL BURDEN: 77.35 hrs. /respondent x 66 respondents = **5,105 hrs.**

TOTAL ANNUAL COST: \$5,006 /respondent x 66 respondents = **\$330,408.99**

Table 3. Average Annual Respondent Burden and Cost Estimates to Certifying Authorities for Annual Reports on Certification and Training Programs*

Collection Activities	Annual Burden Hours Per Respondent		TOTALS	
	Tech. \$78.44/hr.	Clerical \$55.17/hr.	Hours	Cost \$
Read/hear rule or any collection instrument instruction (incl. compliance determination)	0.25	0.00	0.25	\$20
Create information	5.00	0.00	5	\$392
Gather information	5.00	0.00	5	\$392
Process, compile, review information for accuracy	1.00	0.00	1	\$78
Complete written forms or other instruments	0.50	0.50	1	\$67
Record, disclose, display, or report the information	20.00	45.00	65	\$4,051
Store, file, or maintain the information	0.00	0.10	0.10	\$6
TOTAL	31.75	45.60	77.35	\$5,006

*Estimates may not add due to rounding.

NAICS codes

State government: 999200

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

Clerical, Office and Administrative Support Occupations: 43-0000

(iii) Burden Associated with Certification and/or Training Applicators under EPA-Administered Programs in Indian Country

There are on average 657 applicators who are certified under an EPA-approved certification plan that submit a form to become federally certified under the EPA-Administered plan for Indian Country. The estimated average annual burden and cost for certified applicators (414 certifying commercial and 243 private applicators) to submit forms for certification under the EPA Plan for Indian Country is 10 minutes and \$8 per respondent, with the total annual burden and cost for all certified applicators in this category estimated to be about 111.69 hours and \$5,383.62.

TOTAL ANNUAL BURDEN: 0.17 hrs. /respondent x 657 respondents = **111.69 hrs.**

TOTAL ANNUAL COST: \$8/respondent x 657 respondents = **\$5,383.62**

Table 4a. 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 \$48.20/hr.	Total Hours	Cost \$
Read/hear rule or any collection instrument instruction (incl. compliance determination)	0.07	0.07	\$3
Complete written forms or other instruments	0.10	0.10	\$5
TOTAL	0.17	0.17	\$8

*Estimates may not add due to rounding.

NAICS code: 115000

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

Private applicators have the option to take an EPA-administered training course for private applicators for certification under the EPA Plan for Indian Country. This course is expected to cost \$583 per enrolled private applicator. Based on 45 private applicators opting for the course, the total annual cost estimates for this activity are \$3,499.43 (Table 4b).

TOTAL ANNUAL BURDEN: 12.1 hrs. /respondent x 45 respondents = **72.6 hrs.**

TOTAL ANNUAL COST: \$583/respondent x 45 respondents = **\$3,499.43**

Table 4b. Private Applicator Training Certification Option in the EPA-Administered Plan (Indian Country)*

	Annual Burden and Cost Per Respondent		
	Tech. Hours \$48.20/hr.	Total Hours	Cost \$
Read/hear rule or any collection instrument instruction (incl. compliance determination)	0.07	0.07	\$3
Complete optional EPA-administered training program	12.00	12.00	\$578
Complete written forms or other information	0.03	0.03	\$1
TOTAL	12.10	12.10	\$583

*Estimates may not add due to rounding.

NAICS code: 37-3012

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

(iv) Burden of Certified Applicator Recordkeeping for Restricted Use Pesticide Applications

Consistent with 7 U.S.C. 136i(d)¹, recordkeeping requirements under the EPA Plan for Indian Country are not applicable to private applicators and are therefore only required for commercial applicators. There are, on average, 414 commercial applicators who apply for certification and are subject to RUP recordkeeping requirements under the EPA Plan. The total annual respondent cost for all commercial applicator recordkeeping of RUP applications under the EPA Plan is estimated at \$140,459.10 with an average annual per-respondent cost of \$149 (Table 5).

TOTAL ANNUAL BURDEN: 3.1 hrs. /respondent x 414 respondents = **2,914 hrs.**

TOTAL ANNUAL COST: \$149/respondent x 414 respondents = **\$140,459.10**

¹ <https://www.govinfo.gov/content/pkg/USCODE-2024-title7/pdf/USCODE-2024-title7-chap6-subchapII-sec136i.pdf>

Table 5. 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 \$48.20/hr.	Total Hours	Cost \$
Read/hear rule or any collection instrument instruction (incl. compliance determination)	0.2	0.2	\$10
Create information	2	2	\$96
Store, file, or maintain the information	0.9	0.9	\$43
TOTAL	3.1	3.1	\$149

*Estimates may not add due to rounding.

NAICS code: 37-3012

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

Recordkeeping of applications by all commercial applicators under certifying authorities has an estimated total annual cost of \$67,093,776.22, based on the commercial applicator count of 449,014, with an average annual per-respondent cost of about \$149 (Table 6).

TOTAL ANNUAL BURDEN: 3.1 hrs. /respondent x 449,014 respondents = **1,391,944 hrs.**

TOTAL ANNUAL COST: \$149/respondent x 449,014 respondents = **\$67,093,776.22**

Table 6. Average Annual Respondent Burden and Cost Estimates for Commercial Applicators and Firms under Certifying Authorities' Programs for Recordkeeping for RUP Applications*

Collection Activities	Annual Burden and Cost Per Respondent		
	Tech. Hours \$48.20/hr.	Total Hours	Cost \$
Read/hear rule or any collection instrument instruction (incl. compliance determination)	0.2	0.2	\$10
Create information	2	2	\$96
Store, file, or maintain the information	0.9	0.9	\$43
TOTAL	3.1	3.1	\$149

*Estimates may not add due to rounding.

NAICS code: 37-3012

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

(v) Recordkeeping Burden for RUP Dealers

The EPA estimates that there are approximately 16,226 agricultural retail establishments that sell RUPs and an estimated 1,000 retail establishments that sell RUPs to non-agricultural establishments. The Agency assumes for this estimate that all 17,226 establishments are licensed to sell RUPs. These numbers do not capture RUP dealers that operate within the jurisdiction of Indian country. On average, each RUP dealer is estimated to have approximately 5 RUP sales per week for 9 months of the year, for a total of 195 RUP sales transactions per year. Each transaction requires recordkeeping (i.e., event) that is estimated to take approximately 3 minutes (0.05 hours) and cost about \$2.81 (Table 7). The estimated average annual burden in terms of hours and cost per RUP dealer to comply with new recordkeeping requirements is 9.8 hours and

\$548.

The total annual burden for all RUP dealer respondents is estimated to be 167,954 hours and the total annual cost is \$9,437,561.

TOTAL ANNUAL BURDEN: 9.8 hours/respondent x 17,226 respondents = **167,954 hrs.**

TOTAL ANNUAL COST: \$548/respondent x 17,226 respondents = **\$9,437,561**

Table 7. Recordkeeping for RUP Dealers under Authorized Agency Programs*

Collection Activities	Wage Rate	Per Event Average		Per-Respondent Average (195 responses)	
		Burden (hours)	Cost (\$)	Burden (hours)	Cost (\$)
Create information	\$56.19 ^a	0.02	\$1.12	3.9	\$219
Store, file or maintain the information	\$56.19 ^a	0.03	\$1.69	5.9	\$329
Totals	\$56.19	0.05	\$2.81	9.8	\$548

Source: EPA estimates; wages from BLS (2024). Estimates may not add due to rounding. Respondents (RUP dealers) are counted only once.

*Estimates may not add due to rounding.

^a NAICS 444200; Sales Managers 41-1011.

Source: EPA estimates; wages from BLS (2024). Estimates may not add due to rounding. Respondents (RUP dealers) are counted only once.

The estimated average annual cost per respondent for all RUP dealers in Indian country to record sales and maintain records is \$3, with the total annual cost for all 49 RUP dealers estimated to be approximately \$5,369.10. This assumes 39 RUP sales transactions per dealer per year, with 3 minutes (0.05 hours) required during each transaction, or approximately 95.55 hours per year for the 49 respondents over the course of a year (Table 8a).

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

TOTAL ANNUAL COST: (\$3/respondent x 49 respondents) x 39 responses per respondent = **\$5,369.10**

Table 8a. Dealers in Federal Programs (Indian Country) for RUP Sales Recordkeeping*

Collection Activities	Annual Burden and Cost Per Response		
	Tech. Hours \$56.19/hr.	Total Hours	Cost \$
Read/hear rule or any collection instrument instruction (incl. compliance determination)	0.02	0.02	\$1
Create information	0.02	0.02	\$1
Store, file or maintain the information	0.01	0.01	\$1
TOTAL	0.05	0.05	\$3

*Estimates may not add due to rounding.

NAICS code: 444200

Sales Managers 41-1011

Under the Federal certification plan for Indian country, 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 \$56 (16 dealers x 1 x wage rate), EPA estimates the total annual cost for this activity at \$899.06 (Table 8b).

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

TOTAL ANNUAL COST: \$56 /response x 16 dealers = **\$899.06**

Table 8b. Dealers in Federal Programs (Indian Country) for Reporting Dealerships' Name and Address Changes*

Collection Activities	Annual Burden and Cost Per Response		
	Tech. Hours \$56.19/hr.	Total Hours	Cost \$
Read/hear rule or any collection instrument instruction (incl. compliance determination)	0.2	0.2	\$11
Create information	0.3	0.3	\$17
Report dealership contact information	0.4	0.4	\$22
Store, file or maintain the information	0.1	0.1	\$6
TOTAL	1	1	\$56

*Estimates may not add due to rounding.

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

(vi) Burden for Training Noncertified Applicators

Noncertified applicators that apply RUPs under the direct supervision of certified applicators are required to receive pesticide safety training. This requirement can be fulfilled in 4 ways – by attending special RUP noncertified applicator training, satisfying pesticide safety training requirements for handlers under the Worker Protection Standard (WPS) (40 CFR 170), attending a relevant training program defined by the state/jurisdiction that is at least equivalent, or being a certified applicator (but is applying as a noncertified applicator due to

lacking the certification for the type of application or not certified in the jurisdiction where the use will take place). It is assumed that all noncertified applicators who work as agricultural handlers will have taken the WPS handler training, and therefore, would not take any additional training to meet this requirement. Certified applicators who have not met the certification requirements for the specific application, and therefore, may only use under the RUP supervision of a certified applicator who meets the requirements, are not required to attend the noncertified applicator training. There is also an option to take state/jurisdiction specified equivalent training in jurisdictions where available. Although these alternative options are available, it is assumed that all other noncertified applicators besides agricultural handlers, including the certified applicators who have not met the certification requirements for the specific application type or jurisdiction, would take the noncertified applicator training.

To calculate burden and costs, the respondents are separated into private and commercial applicator categories.

The EPA estimates that there are 929,065 noncertified applicators under the supervision of commercial applicators. Of these, the EPA estimates that 10,174 are employed by firms serving the agricultural sector and will likely receive pesticide handler training under the Worker Protection Standard. Therefore, it is assumed that all other noncertified applicators (918,892) will likely receive one hour of training per year (trainees). The EPA estimates that there are about 449,014 commercial applicators (trainers) providing the training. The total annual estimated respondent burden for commercial applicators to train noncertified applicators and to record and maintain records of the training is 1,397,841 hours at a total cost of \$59,395,828 per year (Table 9a).

Table 9a. Training of Noncertified Applicators under the Supervision of Certified Commercial Applicators*

Activity	Respondent Group	Number of Respondents	Wage Rate	Per Event Average		TOTALS	
				Burden hours	Cost (\$)	Burden hours	Cost (\$)
Train noncertified applicators	Noncertified Applicators	918,892	39.51 ^a	1	39.51	918,892	\$36,309,797
	Commercial Applicators	449,014	48.20 ^b	1	48.20	449,014	\$21,643,154
Record and maintain records of noncertified applicator training	Commercial Applicators	449,014	48.20 ^b	0.067	3.21	29,934	\$1,442,877
TOTALS		1,367,906				1,397,841	\$59,395,828

Source: EPA estimates; wages from BLS (2024).

*Estimates may not add due to rounding. Respondents (noncertified applicators under the supervision of commercial applicators) are counted only once. Only one training is taken and recorded per respondent.

^a NAICS 115000; Agricultural Workers 45-2092^b NAICS 115000; Pesticide Handlers and Applicators 37-3012

For private applicators supervising RUP applications, the EPA estimates there are approximately 28,092 noncertified applicators (trainees) receiving 1 hour of training per year, and that the ratio of trainer to trainee is 1:1. The EPA estimates that there are a total of 80,587 noncertified applicators who apply RUPs under the supervision of private applicators, but the majority (52,495) are employed on farms that produce crops and will receive pesticide handler training under the Worker Protection Standard, thereby satisfying the training requirement. The total annual respondent burden for private applicators to train noncertified applicators applying RUPs under their supervision, is 56,184 hours and total cost of \$4,296,469 per year. For private applicators training noncertified applicators, there is no record keeping requirement under 40 CFR 171 (Table 9b).

Table 9b: Training of Noncertified Applicators under the Supervision of Certified Private Applicators*

Activity	Respondent Group	Number of Respondents	Total Responses Annually (3-year average)	Wage Rate ^a	Per Event Average		TOTALS	
					Burden (hours)	Cost (\$)	Burden (hours)	Cost (\$)
Train noncertified applicators	Private applicators	28,092	28,092	104.74 ^b	1	104.74	28,092	\$2,942,393
Attend noncertified applicator training	Noncertified applicators	28,092	28,092	48.20 ^c	1	48.20	28,092	\$1,354,076
Totals		56,183	56,183				56,184	\$4,296,469

Source: EPA estimates; wages from BLS (2024). Estimates may not add due to rounding. Respondents (noncertified applicators under the supervision of private applicators) are counted only once.

*Estimates may not add due to rounding.

^a Fully loaded, units are in dollars per hour.

^b NAICS Sector 11; Farmers, Ranchers, and Agricultural Managers 11-9013

^c NAICS Sector 11; Pesticide Handlers and Applicators 37-3012

(vii) Applicator training and sales of anthrax-related products

For registrants of anthrax-related products, the estimated average annual cost per registrant for training and examination materials is about \$2,278, with the total annual cost for all registrants estimated to be almost \$4,556.82 (Table 10).

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

TOTAL ANNUAL COST: \$2,278 /respondent x 2 respondents = **\$4,556.82**

Table 10. 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. \$92.85/hr	Clerical \$64.23/hr	Hours	Cost \$
Read/hear PR Notice (guidance)	0.5	0.0	0.5	46
Develop Training & Examination Materials	20.0	0.0	20	1,857
Review information for accuracy	2.0	0.0	2	186
Submit training and exam materials to EPA	1.0	1.0	2	157
Record, store, and file the information	0.0	0.5	0.5	32
TOTAL	23.5	1.5	25	2,278

*Estimates may not add due to rounding.

Standard Occupational Codes: 3250A1

Management: 11-0000, Management Occupations

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

Clerical: 43-0000, Office and Administrative Support Occupations

The estimated average annual cost to these respondents for recordkeeping activities is approximately \$1,718 per registrant, with the total annual cost for all registrants estimated to be about \$3,435.61 (Table 11).

TOTAL ANNUAL BURDEN: 18.5 hrs. /respondent x 2 respondents = **37 hrs.**

TOTAL ANNUAL COST: \$1,718/respondent x 2 respondents = **\$3,435.61**

Table 11. Anthrax-related products: Average Annual Respondent (Registrant) Burden and Cost Estimates for Recordkeeping*

Collection Activities	Annual Burden and Cost Per Respondent		
	Tech. Hours \$92.85/hr.	Total Hours	Cost \$
Read/hear PR Notice (guidance)	0.5	0.5	\$46
Gather and review information	10.0	10.0	\$929
Record, store, and file the information	5.0	5.0	\$464
Submit information, only if requested	3.0	3.0	\$279
TOTAL	18.5	18.5	\$1,718

*Estimates may not add due to rounding.

Standard Occupational Codes: 3250A1

Management: 11-0000, Management Occupations

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

Clerical: 43-0000, Office and Administrative Support Occupations

B. Estimates of annualized cost to the Federal government

The Agency has estimated the annual burden to the EPA to review certification plans and modifications, the submissions of annual reports from certifying authorities, applications for certification in EPA-administered programs, as well as registrants' training material submissions for anthrax-related products. Adjustments to the existing ICR are revisions to burden and cost estimates due to available updates in factors used in their estimation. For example, updated wage rates are available from the Bureau of Labor Statistics. These adjustments are included in this section.

(i) Burden to the Agency for Certification Plan Implementation

1. Burden for the Agency to Review and Approve Certification Plans and Modifications to Plans

The EPA's burden to review and approve the modified certification plans is shown below. There are 66 certifying authorities (50 states plus D.C., 5 territories, 5 tribes and 5 federal agencies) that are required to submit modified plans, as needed, to the EPA for the Agency to review. Assuming each certifying authority submits one modification per year, the burden for the EPA to review and approve modified certification plans submitted by states, D.C., territories, and tribes is estimated at 20 hours per plan. The EPA's burden to review modified federal agency certification plans is estimated at 10 hours because federal plans cover fewer applicators and

have a narrower focus than the state, D.C., territory, or tribal certification plans. This review and approval of certification plans would be a one-time activity, not an annual one. The total Agency burden to review all anticipated modified certification plans is 1,270 hours annually and the total cost is \$135,786 per year (Table 12a).

TOTAL ANNUAL BURDEN: (20 hours/state, D.C., territory or tribal plan x 61 states, D.C., territories and tribes = 1,220 hours) + (10 hours / federal agency plan x 5 federal agencies = 50 hours). Total hourly burden = **1,270 hours**

TOTAL ANNUAL COST: (\$2,138.37/state, D.C., territory or tribal plan x 61 states, D.C., territories and tribes= \$130,441) + (\$1,069.18/federal agency plan x 5 federal agencies = \$5,346). Total cost = **\$135,786**

Table 12a. Agency Burden and Cost Estimates - Burden to EPA for Review and Approval of Certification Plan Modifications Submitted by Certifying Authorities*

Collection Activities	Number of Respondents	Tech. Hours \$106.92/hour ^a	Total Burden Hours	Total Cost (\$)
Review State, D.C., Territory and Tribal Plans	61	20	1,220	\$130,441
Review Federal Agency Plans	5	10	50	\$5,346
TOTAL	66	30	1,270	\$135,786

*Estimates may not add due to rounding.

^a NAICS 999100; Technical 19-0000.

Source: EPA estimates; wages from BLS (2024). Estimates may not add due to rounding

2. Burden to EPA for Revisions of EPA-Administered Certification Plans

Currently there is one EPA-administered certification plan (EPA Plan for Indian Country) that the Agency may need to modify, as needed. The Agency may also need to update its databases to track the certification status of applicators. EPA estimates these activities to take about 79 hours a year for the EPA-Plan. The total annual burden to perform this activity is 158 hours and the cost is approximately \$17,000 per year (Table 12b).

Agency TOTAL ANNUAL BURDEN: 79 hours/response x 1 response = **79 hrs.**

Agency TOTAL ANNUAL COST: \$8,500 /response x 1 response = **\$8,500**

Table 12b. Agency Burden and Cost Estimates – EPA to Modify EPA-Administered Certification Plans and Update Database*

Collection Activities	Annual Burden Hours Per Respondent			TOTALS	
	Managerial \$160.15/hour ^a	Technical \$106.92/hour ^b	Clerical \$59.02/hour ^c	Hours	Cost \$
Modify EPA-Administered Certification Plans	10	12	10	32	\$3,475
Submit Plans	0	8	0	8	\$855
Update Database	0	39	0	39	\$4,170
TOTAL	10	59	10	79	\$8,500

*Estimates may not add due to rounding.

^a NAICS 999100; Management 11-0000

^b NAICS 999100; Technical 19-0000

^c NAICS 999100; Clerical 43-0000

Source: EPA estimates; wages from BLS (2024). Estimates may not add due to rounding. Respondents are counted only once.

(ii) Agency Burden to Implement EPA-Administered Programs in Indian Country

Based on experience, the Agency has estimated the annual burden to the federal government to review the submissions of annual reports from certifying authorities and applications for certifications under Indian country. 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 per quarter. The Agency's total regional annual burden associated with the certification of pesticide applicators program is estimated at 1,998.10 hours. The total regional annual cost to the Agency is estimated at \$214,666 (Table 13a).

Table 13a. Annual Agency Burden and Cost Estimates - Burden to EPA Regional Offices for Indian Country Program and for Processing Annual Reports from Certifying Authorities Prior to Submission to Headquarters*

Collection Activities	Mgmt. hours \$160.15/hr.	Tech. hours \$106.92/hr.	Clerical hours \$59.02/hr.	Total Hours	Cost \$
Prepare Regional Reports - for Federal Programs in Indian Country (including collecting dealer reports) ²	0.0	1040	0	1040.0	\$111,195
Answer respondent questions	7.1	228	0	235.1	\$25,514
Audit/review submissions	15.0	638	0	653.0	\$70,616
Reformat and distribute data	0.0	50	0	50.0	\$5,346
Store, file, or maintain the information	0.0	17	3	20.0	\$1,995
TOTAL	22.1	1,973	3	1,998.10	\$214,666

*Estimates may not add due to rounding.

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

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 **\$28,013** (Table 13b). The cost of burden has increased to reflect the latest wage labor rates (2024), but the total Agency burden remains the same as the last renewal.

Table 13b. Annual Agency Burden and Cost Estimates - Burden to Headquarters for Review of Submitted Annual Reports and Administering Training*

Collection Activities	Tech. Hours \$106.92/hr.	Cost \$
Administer/provide private applicator training	12	\$1,283
Answer respondent questions	116	\$12,403
Audit/review submissions	93	\$9,943
Reformat and distribute data	29	\$3,101
Store, file, or maintain the information	12	\$1,283
TOTAL	262	\$28,013

*Estimates may not add due to rounding.

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(iii) Burden to EPA for 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 **\$8,019** (Table 13c).

² The EPA-administered plan for Indian Country plan is included in the Regions' reports.

Table 13c. 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 \$106.92/hr.	Cost \$
Answer respondent questions	3	\$321
Audit/review submissions	60	\$6,415
Reformat and distribute data	6	\$642
Store, file, or maintain the information	6	\$642
TOTAL	75	\$8,019

*Estimates may not add due to rounding.

NAICS 999100 -Federal Executive Branch Standard Occupational Codes:

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Clerical: 43-0000, Office and Administrative Support Occupations

C. Total Burden Hours and Cost

Table 14. Total Annual Burden and Cost Table*

Respondent		Number of Responde nts	Total Burden Hours	Total Labor Cost (\$)
Rule Familiarization	Sec A.i.1	830,597	207,699.00	\$15,187,681
<i>Certification Plan Modifications by Certifying Authorities (Tables 2a and 2b)</i>				
States, DC, Territories	Sec A.i.2	56	119,560.00	\$9,591,542
Federal Agencies and Tribes	Sec A.i.2	10	720.00	\$77,195
Certifying Authorities' Annual Reporting	Sec A.ii	66	5,105.00	\$330,409
<i>Federal certification program - certified applicators</i>				
EPA Certification Form	Sec A.iii	657	111.69	\$5,384
Private Applicator Training Certification Option	Sec A.iii	45	72.60	\$3,499
Commercial Applicator Recordkeeping				
RUP Application Records under EPA-Administered Programs	Sec A.iv	414	2,914.00	\$140,459
RUP Application Records under Certifying Authorities' Programs	Sec A.iv	449,014	1,391,944.00	\$67,093,776
RUP Dealer Recordkeeping				
RUP Sales – Authorized Agency Programs	Sec A.v	17,226	167,954.00	\$9,437,561
RUP sales for EPA- Administered programs	Sec A.v	49	95.55	\$5,369
RUP dealer burden for reporting informational changes – EPA Administered programs	Sec A.v	16	16.00	\$899
Noncertified Applicator Training				
Noncertified applicators under the supervision of Commercial Applicators	Sec A.vi	1,367,906	1,397,841.00	\$59,395,828
Noncertified applicators under	Sec A.vi	56,183	56,184.00	\$4,296,469

the supervision of Private Applicators				
Anthrax-related products - registrants				
Training and Examination Materials	Sec A.vii	2	50.00	\$4,557
Recordkeeping	Sec A.vii	2	37.00	\$3,436
Respondent Total			3,350,305	\$165,574,064
Agency			Total Burden Hours	Total Labor Cost (\$)
EPA Review/Approval of Authorized Agency Plans	Sec B.i.1		1,270.00	\$135,786
EPA-Administered Certification Plans	Sec B.i.2		79.00	\$8,500
EPA Regional Offices (Table 13a)	Sec B.ii		1,998.10	\$214,666
EPA Headquarters (Table 13b)	Sec B.ii		262.00	\$28,013
EPA Headquarters – review of registrant training materials for anthrax-related products (Table 13c)	Sec B.iii		75.00	\$8,019
Agency Total			3,684.10	\$394,984

*Estimates may not add due to rounding.