

**Supporting Statement for a Request for OMB Review under
The Paperwork Reduction Act**

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

TITLE: **Chemical-Specific Rules, Toxic Substances Control Act Section 8(a)**

EPA ICR No.: **1198.08** **OMB Control No:** **2070-0067**

1(b) Short Characterization

This information collection request requires OMB's approval for the continued collection of chemical-specific information under section 8(a) of the Toxic Substance Control Act (TSCA, 15 U.S.C. 2607); see Attachment 1. TSCA section 8(a) authorizes the Administrator of the EPA to promulgate rules that require persons who manufacture, import or process chemical substances and mixtures, or who propose to manufacture, import, or process chemical substances and mixtures, to maintain such records and submit such reports to EPA as may be reasonably required. Information that may be collected under TSCA section 8(a) includes, but is not limited to, chemical names, categories of use, production volume, byproducts of chemical production, existing data on deaths and environmental effects, exposure data, and disposal information. These data are collected by the Office of Pollution Prevention and Toxics (OPPT) and may be used by other EPA offices and/or Federal agencies to ensure knowledge of specific practices that may affect human health and the environment.

There may be circumstances when EPA may require different information than is readily available or information that is different from that available through existing regulatory information collection tools, like the TSCA section 8(a) Preliminary Assessment Information Rule (PAIR) which is discussed in another ICR under a different OMB control number. EPA promulgated PAIR on June 22, 1982 (see 40 CFR Part 712). Whenever a substance is added to the PAIR, manufacturers and importers of the substance are required to complete a PAIR report form. The PAIR report requests a very limited amount of information on listed chemicals regarding activities occurring over a specific time period.

Any chemical covered by TSCA for which OPPT, other EPA Offices or another Federal agency has a reasonable need for information, and which cannot be satisfied via readily available sources or by use of PAIR, is a proper potential subject for a chemical-specific TSCA section 8(a) rulemaking. For instance EPA may wish to ask detailed questions in regard to how industry oversees the use and production of a chemical. These specific monitoring capabilities could allow EPA to react to change in market conditions that may warrant a change in EPA's regulatory strategy. Therefore, EPA could promulgate a TSCA section 8(a) rule to gather this information by requesting that current or potential manufacturers, importers or processors of the substance provide chemical-specific information.

EPA's OPPT, other EPA Offices and/or other Federal agencies will generally be the primary groups for which information will be collected. However, to the extent that reported information is not considered to be confidential business information (CBI), environmental groups, environmental justice advocates, state and local government entities and other members of the public will have access to this information for their own use.

Rather than requiring respondents to submit information on reporting forms such as those used for PAIR, EPA has in the past allowed individual firms to choose the reporting means and format that is best suited to their recordkeeping resources. EPA believes that for TSCA section 8(a) chemical-specific rules, this allowance keeps reporting costs low.

Total annual cost of a rule varies depending upon the number of chemicals per rule and the number of respondents per chemical. Based on the recent past usage of chemical-specific TSCA section 8(a) rules and expected future usage, EPA assumes that it will promulgate one TSCA section 8(a) chemical-specific rule with four respondents (notices) per year for the three-year duration of the ICR (see Section 6(b), below). The maximum total annual number of burden hours for respondents range from 134 hours to 594 hours per TSCA section 8(a) chemical-specific rule. The maximum cost associated with the promulgation of a TSCA section 8(a) chemical-specific rule is \$6,868 to \$30,504. However, the cost per respondent varies with the type of chemical-specific information requested, and subsequently, the tasks required to comply with a TSCA section 8(a) chemical-specific rule. Because all respondents may not have to provide information on all data items listed (see Sections 3 and 6(b), below), the ranges presented above are maximums. Assuming that all respondents do not have to complete all tasks identified to comply with a TSCA section 8(a) chemical-specific rule, total annual reporting costs to all respondents range from \$3,375 to \$14,080 per rule.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

Generally, EPA may need chemical-specific information under TSCA section 8(a) to evaluate the potential for adverse human health and environmental effects caused by the manufacture, importation, processing, use or disposal of identified chemical substances and mixtures. Additionally, EPA may use TSCA section 8(a) information to assess the need or set priorities for testing and/or further regulatory action.

The information required in TSCA section 8(a) chemical-specific rules can be custom-tailored to aid in achieving EPA's goals of protecting human health and the environment. Information collected may vary depending on the substance, its current and potential uses and EPA's concerns about potential human or environmental risks caused by exposures to the substance. Promulgated TSCA section 8(a) rules may require persons manufacturing, importing or processing the chemical substance to report to EPA on specific information such as: a chemical's composition, byproducts, quantity produced, employee exposure and environmental release. Persons have in the past also been required to notify EPA of a management decision to initiate the manufacturing, importing, or processing of a chemical substance or mixture.

The legal authority for this information collection is TSCA section 8(a), U.S.C. 2607(a). TSCA section 8(a) chemical-specific rules have been codified at 40 CFR 704, subpart B; see Attachment 2.

2(b) Use/Users of the Data

EPA will use the information obtained through the TSCA section 8(a) reporting rules to satisfy specifically identified data needs. The information collected will be relevant to risk identification, all stages of risk assessment, and/or control action functions. Receipt of TSCA section 8(a) information may also give the Agency an opportunity to work with the respondent, if necessary, to minimize exposure risks associated with specific uses. Generally, a specific information collection request would be made by the Chemical Control Division, National Program Chemicals Division, or the Risk Assessment Division in OPPT. However, other regulatory agencies and departments, such as Occupational Safety and Health Administration (OSHA), the Food and Drug Administration (FDA), and other members of the Interagency Testing Committee (ITC) may also present a need for and subsequently use TSCA section 8(a) data to, for example, assess worker or consumer exposures.

An example of a use of a TSCA section 8(a) chemical-specific rule that was key in affecting a benefit to human health was 1,1-aminoundecanoic acid (1,1-AA). From submitted TSCA section 8(e) “substantial risk” reports, EPA discovered that 1,1-AA is a carcinogen in one sex of one rodent species (male rat), and that exposure is limited to workers producing the nylon in which the chemical is an ingredient. The manufacturer was contacted to obtain exposure data for this chemical. From this contact EPA learned: (1) 1,1-AA was imported and converted into nylon by one company and there was no domestic manufacture; (2) 1,1-AA was handled and transferred in a closed system and all 1,1-AA was converted during the reaction to produce nylon. Consequently, because of limited exposure potential, 1,1-AA was dropped from further review. However, concern would arise if 1,1-AA were to be manufactured domestically because of the greater likelihood for worker exposure. To alert EPA to domestic manufacture, on May 28, 1987, OPPT promulgated a TSCA section 8(a)/5 (SNUR) rule for 1,1-AA (52 FR 19860). Users of TSCA section 8(a) chemical-specific data rarely make a judgment based solely on the content of the TSCA section 8(a) information received but rather use the TSCA section 8(a) chemical-specific information as part of the larger risk management strategy. 1,1-AA TSCA section 8(a) information would be instrumental in affecting a benefit to human health if a company were to begin to manufacture the substance.

3. NON-DUPLICATION, CONSULTATION, AND OTHER COLLECTION CRITERIA

3(a) Non-Duplication

Section 8(a)(2) of TSCA states, “To the extent feasible, the Administrator shall not require any reporting which is unnecessary or duplicative.” The reporting requirements of TSCA section 8(a) rules only require information that EPA believes will assist in a reasoned evaluation of the human health and environmental effects of chemical substances and mixtures. This information is unlikely to be duplicative since, (1) EPA estimates that each rule will generate only a few notices, (2) the information required by the TSCA section 8(a) rule is unique to the

manufacturer, importer or processor (e.g., the proposed date of production or importation, the amount produced or imported, the chemical composition, and uses of the chemical substance or mixture), and (3) EPA thoroughly checks other public and unpublished sources to see if the required data may already be available. Finally, once EPA became aware of a source of substantially similar information, for example via comments on a proposed rule, EPA would not continue with the information collection.

3(b) Public Notice Required Prior to ICR Submission to OMB

In proposing to renew this ICR, EPA provided a 60-day public notice and comment period that ended on March 13, 2007 (72 FR 1509, January 12, 2007). EPA received no comments during the comment period.

3(c) Consultations

EPA has not published a proposed or final TSCA section 8(a) chemical-specific information gathering rule for more than fifteen years and, therefore, has received no comments since that time. EPA has received comments on the use of TSCA section 8(a) reporting rules through published Federal Register notices. Various organizations responded to EPA's request for comments during the 1985 to 1988 ICR period. For example, the Agency originally proposed a SNUR for 4,4,1-methylenebis (2-chloroaniline) (MBOCA) but public comments received in July and August of 1986 on the proposed SNUR suggested that a TSCA section 8(a) rule would be more appropriate. This suggestion was followed, reducing the burden on the public since the TSCA section 8(a) rule exempted small manufacturers, whereas the proposed SNUR would not have had this exemption.

Also, after receiving public comment on the proposed SNUR/8(a) rule for 1,1-aminoundecanoic acid (July 22, 1986), the proposed definition of the term "enclosed process" was modified to account for possible releases through emergency pressure relief, thus expanding the number of processes that would be considered "enclosed" and lessening compliance costs.

The Natural Resources Defense Council (NRDC) has also responded to several TSCA section 8(a) chemical-specific rules. The NRDC is a national nonprofit environmental organization dedicated to the protection of human health and the environment. The NRDC generally urges EPA to adopt a more extensive, detailed set of information requirements.

Additionally, under 5 CFR 1320.8(d)(1), OMB requires agencies to consult with potential ICR respondents and data users about specific aspects of ICRs before submitting an ICR to OMB for review and approval. In accordance with this regulation, EPA submitted questions to nine parties via email. EPA received no responses to its solicitation for consultations. A copy of EPA's consultation email to the above nine potential respondents is included below as Attachment 3. The individuals contacted were:

ACC
Ms. Kathleen Roberts
Kathleen_Roberts@americanchemistry.com
703-741-5178

SOCMA
Mr. James Cooper
cooperj@socma.com
202-721-4158

Dow Chemical Co.
Dr. Susan Hearn
shearn@dow.com
989-636-9192

GE Plastics
Ms. Jessine Monaghan
jessine.monaghan@ge.com
202-637-4003

American Petroleum Institute
Mr. Derek Swick
swickd@api.org
202-682-8341

Environmental Defense
Dr. Richard Denison
rdenison@environmentaldefense.org
202-387-3500

Natural Resources Defense Council
Jennifer Sass, Ph.D.
jsass@nrdc.org
212-727-2700

Improving Kids Environment
Thomas Neltner
neltner@ikecoalition.org
317-442-3973

Consumer Specialty Products Association
D. Douglas Fratz
dfratz@cspa.org

3(d) Effects of Less Frequent Collection

Generally companies are required to report only once under a TSCA section 8(a) reporting rule. EPA may consider requiring reporting on an annual, semiannual, monthly or other basis if the Administrator deems this necessary to protect human health and the environment. EPA tailors each rule to meet chemical-specific data requirements, thus reducing the potential for too frequent data collections.

3(e) General Guidelines

This information collection activity is necessary to implement the statutory requirements of section 8(a) of TSCA and is consistent with the requirements of 5 CFR 1320.6.

3(f) Confidentiality

Submitters may designate information as confidential, trade secret or proprietary. EPA has implemented procedures to protect any confidential, trade secret or proprietary information from disclosure. These procedures comply with EPA's confidentiality regulation, 40 CFR Part 2, Subpart B.

3(g) Sensitive Questions

This section is not applicable. TSCA section 8(a) reporting rules do not include any questions of a sensitive nature.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/North American Industrial Classification System (NAICS) Codes

Respondents affected by this collection activity primarily include those businesses that fall under NAICS codes 325, Chemical Manufacturers and Processors, and 324110, Petroleum Refineries.

4(b) Information Requested

4(b)(i) Data Items

Section 8(a) of TSCA specifically lists a wide range of data items that may be required by EPA, including information on use, production volume, exposure, and health and safety. Data items requested of manufacturers, importers, or processors of certain chemicals vary with each collection request, but will not repeat information previously requested in the PAIR or other information gathering tools. Some data items requested under TSCA section 8(a) chemical-specific rules in the past include: notification and description of changes in the end use of identified substances and mixtures, information on planned manufacturing and on-site processing, and notification of changes to the method of manufacturing the substance (see 40 CFR subpart B).

An example of a past TSCA section 8(a) chemical-specific rule is one issued on 4,4,1-methylenebis (2-chloroaniline) (MBOCA). It required persons who propose to manufacture MBOCA to notify EPA of that intent and to submit information on their planned manufacturing and on-site processing activities. The rule also required persons who are manufacturing MBOCA to notify the Agency if they propose to alter their manner or method of manufacturing the substance.

4(b)(ii) Respondent Activities

Activities a respondent may be required to perform as a result of TSCA section 8(a) chemical-specific rule are as follows:

9 to 29.5 Hours of Managerial Labor

- Identify listed chemicals;
- Assign principal technical contact person;
- Identify by-product;
- Review marketing data;
- Research the date of the initiation of manufacture or importation of the chemical;
- Research occupational exposure, environmental release, health and environmental data, disposal methods; and
- Process, compile, and review information for accuracy, substantiate a claim of confidential business information.

17.5 to 98 Hours of Technical Labor

- Identify chemical and trade name and chemical composition;
- Identify by-product;
- Describe use of chemical;
- Report quantity manufactured or imported;
- Research workplace exposures, environmental releases, health and environmental data, and disposal methods; and
- Provide occupational description.

7 to 21 Hours of Clerical Labor

- Format research on occupational exposures, environmental releases, health and environmental data;
- Format attachments; and
- Prepare notice.

Recordkeeping Estimate

TSCA section 8(a) chemical-specific rules may contain recordkeeping requirements. The recordkeeping estimate is rough, but it is reasonably related to the maximum reporting burden. EPA estimates that recordkeeping will account for approximately five percent of the reporting burden, or a maximum of 12 hours (see Table 2.)

5. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION METHODOLOGY AND INFORMATION MANAGEMENT

5(a) Agency Activities Inventory

For any TSCA section 8(a) chemical-specific rule the Agency would have to perform a number of tasks. They are:

- Industry/Public Assistance (answering questions regarding rule)
- Data Processing and System Support Personnel
- Storage and Distribution
- Compliance Monitoring

5(b) Collection Methodology and Management

An improved information technology to minimize burden of a TSCA section 8(a) chemical-specific rule has not been found. EPA has not been able to identify a more efficient, less expensive, or more flexible means of obtaining the required data than the one currently being used. To the extent data are not CBI, all information collected is made available to the public through the public docket office. At the present time, EPA is not requiring firms to submit this information on one standard reporting form. Reporting facilities will be able to choose the format that best suits their reporting resources. TSCA section 8(a) chemical-specific

rules typically require one-time reporting. As future data needs arise, EPA will consider the use of electronic or other types of reporting methods. EPA believes the flexibility already allowed in the reporting structure significantly eases burden.

5(c) Small Entity Flexibility

Section 8(a) of TSCA generally exempts small manufacturers and processors. However, under TSCA section 8(a)(3), EPA may require small manufacturers and processors to report or keep records if the substance or mixture is subject to a rule proposed or promulgated under TSCA sections 4, 5(b)(4), or 6 or with respect to which relief has been granted pursuant to a civil action brought under sections 5 or 7 of TSCA. All respondents to TSCA section 8(a) chemical-specific rules, including small businesses, are granted flexibility in their reporting methods.

5(d) Collection Schedule

TSCA section 8(a) chemical-specific rules are generally one-time collections of specific information, usually regarding one chemical substance. Proposed TSCA section 8(a) chemical-specific rules request comments. The comments are then addressed and incorporated as appropriate in the final rule, which specifies the reporting deadline. Generally, EPA requires that information be reported no sooner than 30 days after the effective date of a final rule.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

Wage rates including fringe benefits and overhead for three broad categories of labor (managerial, technical, and clerical) were used in this analysis. The labor categories and methods for estimating loaded wage rates were developed during previous studies. The basis for estimating wage rates for these purposes is the Bureau of Labor Statistics (BLS) *Employer Costs for Employee Compensation: Private Manufacturing Industry by Occupation, December 2005*. The data series used for this and other analyses is no longer published directly by the BLS, but the BLS continues to make this data available to EPA. Based on the BLS data, the average hourly wage rates (as of December 2005) are \$38.22 for managerial personnel, \$31.02 for technical personnel and \$15.73 for clerical personnel.

The benefits and overhead loading factors are calculated from the BLS data on the cost of benefits, with 17 percent of the average wage added for overhead. The overhead factor of 17 percent is based on information provided by the chemical industry and chemical industry trade associations. The loaded hourly wage rates are \$63.61 for managerial personnel, \$53.02 for technical personnel and \$26.37 for clerical personnel, as shown in Table 1.

TABLE 1: LOADED HOURLY WAGE RATES BY LABOR CATEGORY

Labor Category	December 2005 Average Wages	December 2005 Benefits and Overhead Loading Factor	December 2005 Loaded Hourly Rate
Managerial	\$38.22	1.66	\$63.61
Technical	\$31.02	1.71	\$53.02
Clerical	\$15.73	1.68	\$26.37

Sources: Unpublished *Employer Costs for Employee Compensation: Private Manufacturing Industry by Occupation, December 2005*. Data received by Carol Rawie, US EPA, from Raphael Branch, US Bureau of Labor Statistics, May 10, 2006.

This ICR maintains the assumption of the previous ICR that on average four notices per year are submitted in response to one section 8(a) chemical-specific rule per year. Current labor rates and burden hours used to calculate cost to respondents are listed below.

<u>Labor Category</u>	<u>Burden Hours</u>	<u>Hourly Rate</u>
Managerial	9 to 29.5	\$ 63.61
Technical	17.5 to 98	\$ 53.02
Clerical	7 to 21	\$ 26.37

6(b) Estimating Respondent Costs

The following are the tasks that managers, technical, and clerical personnel are expected to perform in preparing a notice. However, as discussed at the end of this section and presented in Table 1, not all respondents are likely to be required to perform all tasks under each labor category. Therefore, the ranges of labor hours presented below for each labor category (e.g., 9 to 29.5 hours for managers) are the maximums and are based on the assumption that all tasks are performed for each notice.

Managerial Labor

1. Manufacturer identifies listed chemicals;
2. Assign principal technical contact person;
3. Identify by-product;
4. Review marketing data;
5. Research the date of the initiation of manufacture or importation of the chemical;
6. Research occupational exposure, environmental release, health and environmental data, disposal methods;
7. Process, compile, and review information for accuracy, substantiate a claim of confidential business information.

In performing these tasks, managerial labor hours have been estimated to range from 9.5 to 29.5 hours per TSCA section 8(a) chemical-specific rule. At \$63.61 per hour for management labor times the range of hours predicted, [$\$63.61 \times (9.5 \text{ to } 29.5)$], the range of cost for management work is \$604 to \$1,876 per notice resulting from a TSCA section 8(a) chemical-specific rule. With an average of four notices per year for the three-year ICR period, the range of costs per year for managerial labor is [$4 \times (\$604 \text{ to } \$1,876)$] = \$2,416 to \$7,504.

Technical Labor

1. Identify chemical and trade name and chemical composition;
2. Identify by-product;
3. Describe use of chemical;
4. Report quantity manufactured or imported;
5. Research occupational exposures, environmental releases, health and environmental data, and disposal methods;
6. Provide occupational description.

In performing these tasks, technical labor hours have been estimated to range from 17.5 to 98 hours per notice resulting from a TSCA section 8(a) chemical-specific rule. At \$53.02 per hour for technical labor, times the range of hours predicted, ($\$53.02 \times [17.5 \text{ to } 98]$), a range of cost for technical work is estimated to be \$928 to \$5,196 per notice resulting from a TSCA section 8(a) chemical-specific rule. With four notices per year for a three-year period, the range of annual costs for technical labor is [$4 \times (\$928 \text{ to } \$5,196)$] = \$3,712 to \$20,784.

Clerical Labor

1. Format research on occupational exposure, environmental releases, health and environmental data;
2. Format attachments;
3. Prepare Notice.

In performing these tasks, clerical labor has been estimated to range from 7 to 21 hours per notice resulting from a TSCA section 8(a) chemical-specific rule. At \$26.37 per hour for clerical labor, times the range of hours predicted, ($\$26.37 \times [7 \text{ to } 21]$), the range of cost for clerical work is estimated to be \$185 to \$554 per notice resulting from a TSCA section 8(a) chemical-specific rule. With four notices per TSCA section 8(a) chemical-specific rule, the range of costs per year for clerical labor is [$4 \times (\$185 \text{ to } \$554)$] = \$740 to \$2,216.

The cost to a respondent for filing a TSCA section 8(a) notice depends upon the various tasks performed. These tasks could include gathering the required data, preparing and

submitting the TSCA section 8(a) notice, and possibly keeping records. Based on promulgated TSCA section 8(a) rules, EPA estimates that each respondent will submit one notice per TSCA section 8(a) chemical-specific rule. EPA anticipates issuing one TSCA section 8(a) rule per year and expects to receive an average of four notices per year.

The cost to a respondent for submitting a TSCA section 8(a) notice is a function of the number of hours and the hourly labor costs for the individuals developing and preparing the notice. The annual estimated range of cost to the respondent is \$1,717 (\$604 + \$928 + \$185) to \$7,626 (\$1,876 + \$5,196 + \$554) per notice, and \$6,868 to \$30,504 per TSCA section 8(a) chemical-specific rule (above estimates multiplied by four, the number of notices expected per rule.) However, as mentioned above, these figures are likely to overstate the true cost because not all respondents may be required to supply information regarding each activity. Thus, the average actual cost to the respondent will be lower than the \$1,717 to \$7,626 per notice estimate calculated above. The estimated frequency of each activity, along with total respondent cost and burden calculations, is presented in Table 1. The total cost to all respondents of reporting under a TSCA section 8(a) chemical-specific rule is estimated to range from \$3,375 to \$14,080 per year. On a per respondent basis, the annual cost is estimated to range from \$894 to \$3,520 per notice, based on four notices per year.

6(c) Estimating Agency Burden and Cost

The Agency has developed the following burden hour estimates for activities related to promulgating a section 8(a) Chemical Specific rule.

<u>Activity</u>	<u>Burden</u>
Industry/Public Assistance (answering questions regarding the rule)	0.1 FTE
Data processing and systems support personnel	0.2 FTE
Storage and Distribution	0.1 FTE
Compliance monitoring	<u>0.1 FTE</u>
Total FTEs	0.5 FTE

The Office of Pollution Prevention and Toxics bases its burden hour and labor cost estimates on prior experience in gathering and processing information associated with other information collections. Because these activities involve a team approach, the Agency has used a composite burden hour estimate containing workers at various GS levels and calculated hourly costs based upon the wage rate for a GS-12 Step 1. The 2006 annual salary for a GS-12 Step 1 in the Washington DC area is \$65,048. The cost for 0.5 FTE is \$32,524. Incorporation of an overhead and benefits factor of .6 yields a fully loaded cost of \$52,038 to the Agency for promulgating and supporting a TSCA section 8(a) chemical-specific rule. The full-time work year is considered to be 2,080 so that there are 1,040 burden hours associated with 0.5 FTE.

Table 2. Annual Respondent Burden and Costs Associated with Preparing and Filing a TSCA Section 8(a) Notice

Activity	Managerial Hours \$63.61/hr	Technical Hours \$53.02/hr	Clerical Hours \$26.37/hr	Notices per Year	Annual Burden Hours	Annual Costs
Manufacturer ID and Principal Technical Contact	1 - 4			4	4 - 16	\$254 - \$1,018
Chemical and Trade Name		1 - 4		3	3 - 12	\$159 - \$636
Chemical Composition		0.5 - 2		4	2 - 8	\$106 - \$424
Byproduct ID	1	1 - 4		2	4 - 10	\$233 - \$551
Use Description		1 - 4		4	4 - 16	\$212 - \$848
Quantity Manufactured or Imported		1 - 4		4	4 - 16	\$212 - \$848
Marketing Data	1 - 2			2	2 - 4	\$127 - \$254
Date of Initiation of Manufacture or Importation	0.5			4	2	\$127
Occupational Exposure	1 - 4	2 - 16	1 - 3	2	8 - 46	\$392 - \$2,364
Environmental Release	1 - 4	1 - 8	1 - 3	2	6 - 30	\$286 - \$1,515
Occupational Description		1 - 10		1	1 - 10	\$53 - \$530
Health and Environmental Data	2 - 8	8 - 40	1-3	1	11 - 51	\$578 - \$2,709
Disposal Methods	1 - 2	1 - 6		1	2 - 8	\$117 - \$445
Attachments			2 - 6	1	2 - 6	\$53 - \$158
Preparation of Notice			1 - 3	4	4 - 12	\$105 - \$316
Managerial/Legal Review of Submission	1 - 4			4	4 - 16	\$254 - \$1,018
Recordkeeping			1 - 3	4	4 - 12	\$105 - \$316
TOTAL	9.5 - 29.5	17.5 - 98	7 - 21		67 - 275	\$3,375 - \$14,080

6(d) Bottom Line Burden Hours and Costs

The following table displays the annual burden and costs borne by respondents and EPA associated with preparing, filing and reviewing a notice resulting from a TSCA section 8(a) chemical-specific rule.

Table 3. Annual Burden and Cost of a TSCA Section 8(a) Chemical-Specific Rule

	Annual Burden Hours	Annual Costs
Industry	67 to 275	\$3,375 to \$14,080
Agency	1,040	\$52,038

6(e) Reasons for Change in Burden

The current request for renewal estimates a total annual burden to respondents of 275 hours, which is unchanged from the previous ICR renewal.

EPA anticipates issuing one TSCA section 8(a) chemical-specific rule per year with an average of four respondents submitting notices per rule. EPA may promulgate more than one TSCA section 8(a) chemical-specific rule per year over the next three years. If EPA does this, the Agency will submit a technical amendment to OMB to reflect the change in estimated burden to the regulated industry and the government.

6(f) Burden Statement

The public burden for this collection of information is estimated to average 68.8 hours per response (one-quarter of maximum annual burden of 275 hours for four notices). Of the 68.8 hours, 65.8 hours are associated with reporting tasks such as reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. The remaining three hours are associated with recordkeeping. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; and transmit or otherwise disclose the information. An Agency may not conduct or sponsor such a request and a person or facility is not required to respond to a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations in title 40 of the CFR, after appearing in the Federal Register, are listed in 40 CFR part 9 and included on the related collection instrument or form, if applicable.

The Agency has established a public docket for this ICR under Docket ID No. EPA-HQ-OPPT-2006-0852, which is available for online viewing at www.regulations.gov, or in person viewing at the Pollution Prevention and Toxics Docket in the EPA Docket Center (EPA/DC). The EPA/DC Public Reading Room is located in the EPA West Building, Room 3334, 1301 Constitution Ave., NW., Washington, DC. The EPA/DC Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the EPA/DC Public Reading Room is (202) 566-1744, and the telephone number for the Pollution Prevention and Toxics Docket is (202) 566-0280. You may submit comments regarding the Agency's need for this information, the accuracy of the provided burden estimates

and any suggested methods for minimizing respondent burden, including the use of automated collection techniques.

Submit your comments, referencing Docket ID No. EPA-HQ-OPPT-2006-0852 and OMB Control No. 2070-0067, to (1) EPA online using www.regulations.gov (our preferred method), or by mail to: Document Control Office (DCO), Office of Pollution Prevention and Toxics (OPPT), Environmental Protection Agency, Mail Code: 7407T, 1200 Pennsylvania Ave., NW, Washington, D.C. 20460, and (2) OMB by mail to: Office of Information and Regulatory Affairs, Office of Management and Budget (OMB), Attention: Desk Officer for EPA, 725 17th Street, NW, Washington, DC 20503.

ATTACHMENTS TO THE SUPPORTING STATEMENT

Attachments to the supporting statement are available in the public docket established for this ICR under docket identification number EPA-HQ-OPPT-2006-0852. These attachments are available for online viewing at www.regulations.gov or otherwise accessed as described in section 6(f) of the supporting statement.

- Attachment 1:** **15 USC 2607(a) - TSCA Section 8(a)**. Also available at online at the US House of Representatives' Office of the Law Revision Counsel's [US Code website](#)
- Attachment 2:** **40 CFR part 704 - Reporting And Recordkeeping Requirements**. Also available online at the National Archives and Records Administration's [Electronic CFR Webpage](#)
- Attachment 3:** **Copy of Consultations Message Sent by EPA to Potential Respondents**
- Attachment 4:** **Display Related to OMB Control #2070-0067 -Listings of Related Regulations in 40 CFR 9.1**