

OMB Control Number 2070-NEW; EPA ICR Number 2261.01

ICR ATTACHMENT C

Response to Public Comments

MEMORANDUM

SUBJECT: Response to Comments for DfE's Safer Detergents Stewardship Initiative (SDSI) Information Collection Request

FROM: Neil Patel, Acting Division Director,
Economics Exposure and Technology Division

TO: Angela Hofmann, Director,
Regulatory Coordination Staff

DATE: August 2, 2007

The Federal Register Notice for the ICR "Safer Detergent Stewardship Initiative (SDSI) Program" (docket identification number EPA-HQ-OPPT-2007-0274) was published on May 9, 2007. In total, 13 commenters provided feedback during the 60-day public notice and comment period. Below is a brief summary of the comments made and our responses to them.

- Necessity of the proposed ICR

Nine commenters expressed support of SDSI and the proposed ICR, citing that SDSI is a critical program in moving industry toward environmentally preferable detergents and that the ICR is an essential component of the program. These comments are consistent with EPA's consultations with a number of potential respondents.

Two commenters questioned the need for SDSI, stating that (1) SDSI is redundant of private recognition programs and current preferential purchasing incentives and that (2) EPA has not demonstrated that the use of detergents or surfactants poses a risk to human health or the environment. As explained in the ICR supporting statement, the scope and reach of SDSI are distinct from those of other programs. Moreover, NPEs and their breakdown products, such as nonylphenol, are toxic to aquatic life.

- Accuracy of the Agency's estimates of the burden of the proposed ICR

One commenter stated that EPA has underestimated the burden/cost, both to potential participants and the Agency, but he did not suggest alternative assumptions. Based on its consultations with potential respondents, its experience with similar programs, and a lack of

alternative assumptions, EPA believes that the burden and cost estimates are reasonable and has not changed the estimates.

- Quality, utility, and clarity of the information to be collected

One commenter recommended that the scope of SDSI be modified to exclude registered pesticides, or allow an additional one-year period for pesticide products to transition to safer surfactants. As detailed in the application package, EPA is allowing formulators of pesticide products an extra year (i.e., a deadline of December 31, 2008) to incorporate only safer surfactants in third-party finished goods and Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)-registered products. In addition, one commenter recommended that EPA provide a better definition for the term “safer detergent” since it may be unclear what constitutes an unsafe detergent. Based on our consultations, EPA believes that the current definition is clear that NPEs are not allowed for recognition under SDSI. Also, resources, including CleanGredients, are available to aid companies as they continuously improve the ingredients in all their products. Another commenter suggested several editorial changes to the application package which EPA agreed with and incorporated.

- Ways to minimize the burden on potential respondents

As stated above, several editorial changes to the application package were recommended to make it clearer and easier to submit; EPA incorporated these changes. In addition, one commenter recommended that EPA accept electronic submissions to increase efficiency and reduce paper use. In response to this comment and to minimize the paper use, EPA will accept electronic copies of the application that include a scanned signature.