

OMB question: It appears that the consultation with ACC did not alter the burden estimates at all? Why not?

EPA Response: ACC expressed some concern that EPA had not appropriately accounted for paperwork burden related to respondent file reviews/compliance determinations. ACC pledged to pull information together regarding the activity and the related burden (as well as the method for determining the burden) and provide it to EPA. However, we never received this information. Since no additional information was provided during our renewal efforts, we have no concrete basis to add to or otherwise adjust our existing burden estimates. However, we are willing to consider any information ACC may provide in the future and apply it if appropriate to the ICR estimates in future renewals.