

ICR Attachment 6

Consultation Process: EPA's Solicitation for Comments

September 25, 2008

Dear [addressee]:

I am contacting you to solicit your comments on the renewal information collection request (ICR) for the Partial Update of the TSCA Section 8(b) Inventory Data Base, Production and Site Reports (OMB Control No. 2070-0162). The Notice for the ICR renewal and solicitation of comments was published in the Federal Register on September 5, 2008 (73 FR 51805).

The Office of Management and Budget (OMB) regulations that implement the Paperwork Reduction Act require federal agencies proposing to renew an ICR to consult with potential respondents and data users prior to submitting it to OMB for review and approval. This is to be done regardless of whether changes have or have not been made to the collection activity. This consultation requirement is in addition to providing the public with 60 days to comment on the proposed collection activity.

This information collection request addresses the TSCA Section 8(b) reporting and recordkeeping requirements associated with the Inventory Update Reporting (IUR) rule, which is administered by the Environmental Protection Agency (EPA) under the Toxic Substances Control Act (TSCA) (40 CFR part 710). Under section 8(b) (15 USC 2607), the EPA is required to compile and keep current, via periodic inquiry, the Inventory of Chemical Substances in Commerce (TSCA Inventory). The TSCA Inventory is a listing of chemical substances manufactured, imported or processed for commercial purposes in the United States. Companies that manufacture, including import, listed chemicals may be required to report information about these chemicals - the identity of the chemicals, the amounts manufactured or processed, certain details about their manufacture, and other data. This information is used by EPA and other government agencies to identify potential use and exposure scenarios so that they may protect human health and the environment.

Following is a list of questions regarding this ICR renewal. Your meaningful and timely answers will help us develop this renewal ICR.

**QUESTIONS**

*1. INFORMATION COLLECTION*

Is the information that the Agency seeks under this ICR available from any public source, or already collected by another office at EPA or by another agency? If yes, where can the Agency find the data?

Is it clear what is required for data submission? If not, are there any suggestions for clarifying instructions?

## 2. *ELECTRONIC ALTERNATIVES*

Are you interested in using an electronic reporting/data submission option? Current electronic reporting alternatives include the use of encrypted Internet submissions via the EPA's Central Data Exchange (CDX) and magnetic media-based submissions on CD-ROM. Where a reporting requirement includes a signature requirement, consider whether a secure electronic signature method (such as electronic signature credential) is appropriate, whether a less secure method (such as the use of PINS and passwords) would be more appropriate, or, if data are submitted on CD-ROM or disk, whether a signed cover sheet may be sufficient for the Agency's purposes.

How does CBI affect your choice or use of an electronic medium? Would you be more inclined to submit CBI electronically (i.e., CDX, CD-ROM, etc.) than on paper and what benefits would you realize (i.e., burden reduction, greater efficiency in compiling the information, etc.)?

## 3. *BURDEN COST ANALYSIS*

Do you agree with EPA's estimated burden and costs (note that the ICR addresses only costs associated with paperwork)? Are the Bureau of Labor Statistics (BLS) labor rates accurate? If you have any reason to consider the BLS labor rates inaccurate or inappropriate as used by EPA, explain your rationale.

Please note that, if you take this opportunity to provide input, your name, affiliation, phone number, and any information you provide (e.g., copies of emails) will be incorporated and attached to the ICR supporting statement which will be a public document. In addition, you may be contacted by the OMB Desk Examiner for this ICR to verify the accuracy of any comments as reported in the ICR by EPA.

Your response by November 4, 2008 will be greatly appreciated. Your timely response, along with consultation responses from others and public comments resulting from the FR notice, will be considered as we prepare a final document for OMB review. Thank you for your assistance.

Sincerely,

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