

**ATTACHMENT 5**

**Copy of EPA's Consultation Request to Potential Respondents and  
Response**

## **Persons Contacted for Consultations:**

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## Request for consultation on renewal of VCCEP ICR

**Catherine  
Roman**

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02/19/2009 11:47 AM

Cc: Ron Carlson, Victoria Vanroden, Ward Penberthy

On December 24, 2008, EPA published a Notice in the Federal Register (73 CFR 79086) entitled **Agency Information Collection Activities; Proposed Collection; Comment Request; Voluntary Children's Chemical Evaluation Program (VCCEP); EPA ICR No. 2055.3, OMB Control No. 2070-0165** (Attached). The Notice announces the availability of a supporting statement for the renewal of the Information Collection Request (ICR) for VCCEP and provides a 60-day public comment period. In addition to the Notice and comment requirement, agencies are also required under Office of Management and Budget regulations (5 CFR 1320.8(d)(1)) to consult with potential respondents and data users about specific aspects of an ICR before submitting it to OMB for review and approval. In the case of ICR renewals, the OMB consultation requirement must be met regardless of whether changes have or have not been made to the collection activity.

As part of this required consultation, I am contacting you to solicit your input. I must note that the VCCEP process described in the supporting statement does not include the modifications that EPA is considering for the program. In the past eight months, most of you have been e-mailed information on these modifications and asked to comment, but because the modifications were still being proposed when the lengthy ICR renewal process required a final supporting statement, those modifications could not be included. To prevent a lapse in collection authority for VCCEP due to the expiring ICR, the ICR renewal process could not wait on the approval and adoption of the modifications. The modifications, however, will be captured in the next renewal of the ICR in 2012..

Although the supporting statement describes the VCCEP process but not the modified VCCEP process, both processes involve the collection of the same types of information except that the modified VCCEP will collect fewer chemical assessments and peer consultation will only be done at the sponsor's option to evaluate the basis for the sponsor's disagreement with EPA's decision that additional testing and exposure evaluations are needed. The supporting statement, therefore, overestimates the total collection costs if the modifications are adopted. Also, in the modified VCCEP, the cost of the peer consultation, should the sponsor choose to have one, will be paid by the sponsor where formerly peer consultations were paid by EPA.

I also must note that, if you take this opportunity to provide input, your name, affiliation, and 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 the ICR to verify the accuracy of any comments as reported in the ICR by EPA.

EPA solicits your input on the following questions:

Are the data EPA seeks under this ICR available from any public source, or already collected by another EPA office or by another agency? If so, where can the data be found?

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

Would you be interested in an electronic data submission option? What type of alternative would you be most likely to utilize -- web form, diskette, CD-ROM?

For electronic submissions, how should signature requirements be handled -- Private Key Infrastructure, PINS and passwords, signed paper cover sheet? How does CBI affect your choice or use of an electronic medium? Would you be more inclined to submit CBI on diskette than on paper and what benefits would you realize (burden reduction? Greater efficiency in compiling information? Etc).

Do you agree with EPA's estimated burden and costs (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.

Your timely response will be greatly appreciated. I hope to receive your responses by March 12, 2009 so they can be considered at the same time as any public comments resulting from the FR notice. Thank you for your assistance.

Attachments:

Federal Register notice (73 FR 79086, Dec 24, 2008)



EPA-HQ-OPPT-2008-0816-0001.pdf

Supporting Statement for the VCCEP ICR renewal



EPA-HQ-OPPT-2008-0816-0002.pdf

Attachments to the Supporting Statement



EPA-HQ-OPPT-2008-0816-0003.pdf

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**RE: Request for consultation on renewal of VCCEP ICR**

**michael.hulse** t  
e o: Catherine Roman

03/05/2009 05:43 PM

Burden estimate with noted increases is appropriate.

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