



"Bill Balek" <BILL@issa.com>

01/23/2011 11:39 AM

To "Emily Connor" <Emily_Connor@abtassoc.com>

cc <difiore.david@epa.gov>, <davies.clive@epa.gov>

bcc

Subject RE: Request for feedback on DfE's Safer Detergents Stewardship Initiative

Dear Ms. Connor:

Thank you for the reminder. ISSA has reviewed the ICR and our response is as follows.

As a preface, ISSA is a non-profit trade association that represents the commercial and institutional cleaning industry. Our membership consists of 5,500 member companies including manufacturers and distributors of cleaning products as well as those who provide cleaning services. ISSA and a number of our member companies participated in SDSI a few years ago when DfE first launched this initiative. Our answers below are based on this prior experience as well as our understanding of the industry in general.

1. The proposed collection of information is critical to the operation of the SDSI program. The information collected is essential in determining the extent to which manufacturers and other companies transition to the use of safer surfactants. Consequently, the contemplated information is pivotal in measuring the overall effectiveness and success of the SDSI program.
2. ISSA believes that the estimates set forth in the ICR regarding the burden of the proposed collection of information are reasonable and accurate. Based on ISSA's own experience in participating in SDSI and that of our member companies, the estimates are reasonable in terms of the assumptions made, estimated costs, time and other resources that would be expended by participants in SDSI.
3. At the present, we cannot think of any way to improve the quality, utility or clarity of the information that is to be collected. However, ISSA looks forward to the opportunity to work with DfE and other stakeholders to implement the next phase of SDSI in a manner that maximizes its impact on helping companies and others transition to safer surfactants.

If you require any clarification regarding the above information, please do not hesitate to contact me.

Sincerely,
Bill Balek, ISSA
800.225.4772

From: Emily Connor [mailto:Emily_Connor@abtassoc.com]

Sent: Fri 1/21/2011 9:10 AM

Cc: difiore.david@epa.gov

Subject: Fw: Request for feedback on DfE's Safer Detergents Stewardship Initiative

Hello --

This is a reminder that your request for feedback on DfE's Safer Detergents Stewardship Initiative is due today. Any comments you have on the estimated burden, or suggestions on how to improve the program, would be appreciated. If you plan to provide feedback but need a few more days to do so, please let me know.

Thank you,
Emily

Emily Connor
Environment and Resources Division
Abt Associates, Inc.
4550 Montgomery Avenue, Suite 800 North
Bethesda, MD 20814
301.347.5197

----- Forwarded by Emily Connor/bet/Abtassoc on 01/21/2011 10:06 AM -----

Emily
Connor/bet/Abtass
oc To

01/10/2011 01:47 PM cc
difiore.david@epa.gov
Subject
Request for feedback on DfE's Safer
Detergents Stewardship Initiative

Hello,

I'm writing from Abt Associates on behalf of the U.S. Environmental Protection Agency's Design for the Environment (DfE) Program. We're currently supporting DfE in conducting research on the burden associated with its Safer Detergents Stewardship Initiative (SDSI). The Paperwork Reduction Act requires that federal agencies re-evaluate every three years the recordkeeping and reporting burden associated with information collection requests of this nature.

As a potential respondent, we would value your feedback about the burden associated with SDSI to ensure that our estimates are reasonable.

Attached below is a copy of the Information Collection Request (ICR) for SDSI. For your reference, here is a link to the federal register notice: <http://www.federalregister.gov/articles/2010/11/22/2010-29393/agency-information-collection-activities-proposed-collection-comment-request-safer-deterg>

Please give particular attention to Section 6 of the ICR, which includes burden estimates associated with SDSI participation. When reviewing, please consider the following questions:

- (i) is the proposed collection of information necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility?;
- (ii) are the Agency's estimates of the burden of the proposed collection of information, including the validity of the methodology and assumptions used, reasonable and accurate?;
- (iii) could the quality, utility, and clarity of the information to be collected be improved?

We would greatly appreciate your feedback on the above items and also value your suggestions for future improvements to SDSI. Please send me any comments or feedback by Friday, January 21.

Thanks in advance for your time and assistance!

Sincerely,
Emily Connor

(See attached file: EPA-HQ-OPPT-2010-0874-0002[1].pdf)

Emily Connor
Environment and Resources Division
Abt Associates, Inc.
4550 Montgomery Avenue, Suite 800 North
Bethesda, MD 20814
301.347.5197

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