



Re: Renewal of "PCBs, Consolidated Reporting and Record Keeping Requirements" ICR

Guy Donzella to: Sara Kemme

02/17/2011 01:29 PM

History: This message has been replied to.

Good afternoon Sara.

Answers-

Q1. Some of the PCB data that EPA is seeking may be available through the regional PCB coordinators, inspectors or other personnel. Also, some states like New York collect data on PCBs.

Q2. Yes.

Q3. Yes. Preferably a secured web based data submission system.

Q4. PINS and passwords. TSCA CBI can be protected on a secured web system. There can be a significant increase in efficiency if companies can submit raw data in comma delimited fields.

Q5. Yes.

Hope this helps.

Guy

Kemme.Sara@epamail.epa.gov wrote:

> Hello,
>
> I'm writing to follow up on my earlier email regarding the renewal of
> the PCB Information Collection Request (ICR). You'd previously
> expressed an interest in consulting with us on the PCB ICR.
>
> In particular, EPA is soliciting input on the following issues:
>
> 1. Are the data that 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?
> 2. Is it clear what is required for data submission? If not, are there
> any suggestions for clarifying instructions?
> 3. 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?
> 4. For electronic submission, how should signature requirements be
> handled - Private Key Infrastructure, PINS and passwords, signed paper
> cover sheet?
> How does TSCA CBI affect your choice or use of an electronic medium?
> Would you be more inclined to submit TSCA CBI on diskette than on paper
> and what benefits would you realize (e.g., burden reduction, greater
> efficiency in compiling information, etc).
> 5. Do you agree with EPA's estimated burden and costs (the ICR addresses
> only the 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 as used by EPA inaccurate or inappropriate,
> explain your rationale.
>

> To access the Federal Register Notice, the ICR supporting document, and
> any public comments received to date, go to:
> o www.regulations.gov/
> o enter EPA-HQ-OPPT-2010-0910 in the Enter Keyword or ID field
> o click on "Search"
> o then click on any of the documents listed within the docket to read
> the document; you will be most interested in the Supporting Statement,
> identified by its title beginning "Information Collection Request..."
>
> Please feel free to email me any comments you might have or call me with
> questions or comments.
> We greatly appreciate your input.

>
> Best regards,

>
> Sara Kemme
> U.S. Environmental Protection Agency
> Office of Pollution Prevention and Toxics
> 1200 Pennsylvania Ave. NW
> Washington, DC 20460
> Phone: (202) 566-0511
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Guy D. Donzella, M.S.
Environmental and Safety Manager
EPS Industries
4 Industrial Park Drive
Wheeling, WV 26003
PH (304) 232-1590 Ext. 23
FAX (304) 232-1599
gddonzella@epsonline.com
www.epsonline.com

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* Energized Transformer Hot Oil Reclamation *
* Transformer Assembly & Vacuum-Filling *



PCB ICR consultation
Sara Kemme to: Lacey, Pam
Cc: Peter Gimlin, Johnh Smith

01/18/2011 04:35 PM

Hello Ms. Lacey,

Thanks for speaking with me on the phone today. Below I've included steps on how to find the PCB ICR renewal request. We'll be taking comments on this through www.regulations.gov until February 28th, 2011. Input from your members is welcome.

To access the Federal Register Notice, the ICR supporting document, and any public comments received to date, go to:

- www.regulations.gov/
- enter EPA-HQ-OPPT-2010-0910 in the Enter Keyword or ID field
- click on "Search"
- then click on any of the documents listed within the docket to read the document; you will be most interested in the Supporting Statement, identified by its title beginning "Information Collection Request..."

I've summarized comments from today's conversation below. Let me know if anything appears inaccurate or if you have additional information to add.

- There was concern with the requirement that if testing reveals > 50 ppm PCBs, that collection point or source must be tested every year until there are two successive tests indicate < 50 ppm PCBs. Apparently some collection points become dry holes, so such testing would never reveal <50 ppm PCBs. Wipe samples were suggested.
- There was also concern that sampling data may need to be kept forever.

Let me know if you have any additional input on the following issues:

- Are the data that 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 submission, how should signature requirements be handled – Private Key Infrastructure, PINS and passwords, signed paper cover sheet?
- How does TSCA CBI affect your choice or use of an electronic medium? Would you be more inclined to submit TSCA CBI on diskette than on paper and what benefits would you realize (e.g., burden reduction, greater efficiency in compiling information, etc).
- Do you agree with EPA's estimated burden and costs (the ICR addresses only the 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 as used by EPA inaccurate or inappropriate, explain your rationale.

- The last version of the PCB ICR has the following entry:56 761.60(b)(5)(i)
- See the attached copy of the supporting statement. Do you feel that item #56 on page 86 has changed



since 2003? PCB ICR Supporting Statement.pdf

Your response will be greatly appreciated. If you have any comments in response to the above questions, or with respect to any other part of the information collection, please respond by return e-mail by February 12, 2011. EPA will consider your responses, as well as any public comment received in response to the Federal Register Notice identified above, in preparing a final document for OMB review. Any input you provide, your name, affiliation, e-mail address, and phone number will be incorporated and attached to the ICR supporting statement, which will be a public document. In addition, the OMB Desk Examiner for the ICR in question may contact you to verify the accuracy of any comments EPA identifies in the ICR.

Thank you for your assistance.

Sincerely yours,

Sara Kemme
National Program Chemicals Division, Office of Pollution Prevention and Toxics/Office of Prevention, Pesticides and Toxic Substances Environmental Protection Agency
Washington, DC 20460
(202) 566-0511
Sara Kemme