

# Comparison of 2011 OMB Approved Form to Current OMB Request for Approval

This document includes a question-by-question explanation of how each request for information in the 2014 SNAP Information Notice reflects an existing request for information in the previously-approved SNAP ICR. Explanations are provided for all new information requests. The Parts, Sections (Sect.), and Question Numbers (No.) in the table reference the 2014 SNAP Information Notice.

## Part I: INTRODUCTION AND CONFIDENTIAL BUSINESS INFORMATION

Sect	No.	Information Requested	Existing?	Explanation
A	n/a	Checkbox for Type of Notice	Yes	Revised and clarified checkbox questions to ease respondent burden by reducing and simplifying choices
B	1	Name of Alternative	Yes	Provided space on cover page of submission form to allow easy identification of alternative being submitted to SNAP
B	2	Sector and End-uses	Yes	Sector identification moved to cover page from second page and formatted with drop-down menu of options instead of check boxes to allow easy identification of the sectors; added option to also identify end-uses for which the alternative is being submitted on cover page; drop-down menu of end-uses changes based on sector selected to ease burden <i>Removed "Pesticides" sector to avoid confusion and reduce burden; EPA's Office of Pesticide Programs performs review of alternative pesticides through FIFRA registration</i>
C	n/a	Statement of Data Confidentiality	Yes	Moved request from instructions into form and provided space within form to ease burden by removing the need for a separate attachment to submission and ensure statement of data confidentiality is consistently included
n/a	n/a	FIFRA Registration Number	Moved	Moved from "Introduction" to "Environmental Regulations" in Part III.12. C.
n/a	n/a	Test Data and Other Data	Moved	Removed general checklist of data types from "Introduction" and replaced with check boxes throughout the form in proximity to the question for which the data is being submitted; ease burden by reducing potential confusion about data requirements

## Part II: CONTACT INFORMATION

Sect	No.	Information Requested	Existing?	Explanation
A	1	Person Submitting Notice	Yes	No change

A	2	Agent	Yes	No change
A	3	Technical Contact	Yes	No change
A	4	Joint Submitter	Yes	No change
A	n/a	Prior Communications with EPA	<i>Removed</i>	<i>Removed</i> ; replaced with specific questions on prior communications such as “Test Marketing” in Part III.A.6

**Part III: GENERAL INFORMATION**

Sect	No.	Information Requested	Existing?	Explanation
A	1	Identify Proposed Substitute	Yes	No change
A	2	Commercial/Trade Names of Alternatives	Yes	No change
A	3	Generic Name	Yes	No change
A	4	Impurities	Yes	“(d) Molecular formula” retitled to clarify how to identify each impurity, specifically that EPA is seeking the molecular formula
A	5	Byproducts and Degradation Products	Yes	No change
A	6	Test Marketing	No	Added checkbox to form to ease tracking of communication that occurred prior to submission; no additional work required. (Under 40 CFR 82.176(b)(5), a test marketing notification can be submitted prior to SNAP submission to allow limited sale & use of an alternative for testing purposes.)
A	7	Physical and Chemical Properties	Yes	Provided space to report “(h) bubble point” for blends in place of “boiling point” for single-component alternatives; (k) and (l) added, providing space for submitter to indicate whether or not specific attachments are included in the submission; this will ease tracking and does not require additional work by submitter
A	8	Ozone Depletion Potential	Yes	No change
A	9	Global Warming Characteristics	Yes	No change
A	10	VOC Status Information	Partially	Previously asked for information on other applicable regulations under the CAA; to ease burden, we now identify the specific regulation we are interested in and what information we would like to know related to that regulation
A	11	Cost of Proposed Substitute (Chemical or Blend)	Yes	No change
A	12	Environmental Regulations	Yes	Previously asked for information on other

Sect	No.	Information Requested	Existing?	Explanation
				environmental regulations; to ease burden, we now identify the specific regulations we are interested in
A	13	Health and Safety Regulations	Yes	Previously asked for information on health and safety regulations; to ease burden, we now identify the specific regulations we are interested in
A	14	Toxicity Limits	Yes; Reduced	No additional information requested; refined our previous request for toxicity testing so that for most alternatives submitted to SNAP (existing chemicals under the Toxic Substances Control Act), the submitter may provide summary results; EPA may request more detailed data if the summary data indicate concern or the information provided is not sufficiently complete to analyze toxicity risks
A	15	Safety Documents	Yes	No change

#### Part IV: REFRIGERATION AND AIR CONDITIONING-SPECIFIC INFORMATION

Sect.	No.	Topic	Existing?	Explanation
A	1	Specific End-Use	Yes	Identified checklist of options, with possible response options in pull-down format to guide appropriate response to question and avoid confusion related to terminology
A	2	Additional End-Use Description	Yes	Provided guiding questions and examples to help submitter understand the information being requested by the Agency
A	3	Technology Changes and Costs	Yes	"(d) Ongoing operational cost of equipment" reworded for clarity and to provide separate entry for response
A	4	Production	Yes	No change
A	5	Market Share	Yes	No change
A	6	Energy Efficiency	Yes	No change
A	7	Refrigerant Oil	Yes	Moved question from instructions into form
A	8	Application of Proposed Substitute	No	Added because this information is routinely requested after initial submission; information necessary to run models used by SNAP to assess environmental impacts
A	9	End-Use Specific Standards	Yes	No change
B	1	Physical and Chemical Properties	Yes	Physical and chemical properties divided between Part II and sector-specific sections so that submitters are only responsible for those properties that are necessary for the sector for which they are applying

Sect.	No.	Topic	Existing?	Explanation
B	2	ASHRAE Designation	Partially	Previously requested; however, new format allows easy portrayal and tracking of the status of work being done with ASHRAE
C	1	Flammability-Related Physical and Chemical Properties	Yes	“(c) minimum ignition energy” was not previously specified, but is a property typically identified for flammable refrigerants
C	2	Flammability Assessments and Test Data	Yes	Previously included general request for information on flammability; new form includes more specific description of information needed to readily find submission complete; only required for flammable refrigerants
C	3	Flammability Concerns and Mitigation	Yes	No change
D	all	Exposure	Yes	Limited and reorganized questions to areas for which exposure is a pertinent concern for refrigeration and air conditioning; limited to realistic and easy-to-understand exposure scenarios based on where a leak could occur instead of the individuals/population that could potentially be exposed; replaced ambiguous questions on topics such as “consumer exposure” with a section on exposure during use of equipment which provides EPA with information needed to assess any potential exposure scenarios
D	n/a	Exposure	<i>Removed</i>	<i>Removed</i> questions on general population exposure because general population exposure is not a concern for ref/AC

#### Part V: FOAM BLOWING-SPECIFIC INFORMATION

Sect.	No.	Topic	Existing?	Explanation
A	1	Specific End-Use	Yes	Identified checklist of options to guide appropriate response to question and avoid confusion related to terminology
A	2	Additional End-Use Description	Yes	Provided guiding questions and examples to help submitter understand the information being requested by the Agency
A	3	Technology Changes and Costs	Yes	“(d) Ongoing operational cost of equipment” reworded for clarity and to provide separate entry for response
A	4	Production and Market Share	Yes	No change
A	5	Energy Efficiency	Yes	No change
A	6	Application of Proposed Substitute	No	Added because this information is often requested after initial submission; information

Sect.	No.	Topic	Existing?	Explanation
				necessary to run models used by SNAP to assess environmental impacts
B	1	Physical and Chemical Properties	Yes	<i>Removed</i> several physical chemical properties to include only those necessary for foam blowing
B	2	Manufacture and Degradation Products	Yes	Previously asked for information on manufacture and degradation products; to ease burden, we made the question more specific
C	1	Flammability-Related Physical and Chemical Properties	Yes	“(c) auto ignition temperature” was not previously included, but is a property typically identified for flammable substances
C	2	Flammability Assessments and Test Data	Yes	Previously included general request for information on flammability; new form includes more specific description of information needed to readily find submission complete; only required for flammable substitute
C	3	Flammability Concerns and Mitigation	Yes	Made questions more specific; (b) moved from instructions into form
D	1, 2, 5	Exposure	Yes	Limited and reorganized questions to areas for which exposure is a pertinent concern for foam blowing; limited to realistic and easy-to-understand exposure scenarios based on where foam is blended, blown, and disposed of
D	3	Application of Spray Foam (if Applicable)	Partially	We provided a separate entry for spray foam because the exposure scenarios are unique; new form includes more specific description of information needed to review a submission for a blowing agent in spray foam and does not require that information for other foam uses
D	4	Training Materials	No	Added request for existing training materials related to manufacture, installation, servicing and disposal of foam blowing agents
D	n/a	Exposure	<i>Removed</i>	<i>Removed</i> questions on general population exposure because general population exposure is not a concern for foam blowing agents
E	1	End-uses requiring submission for a blend, even if blowing agents within a blend are already approved	No	Added to provide clarity on a frequently asked question by potential submitters; ease burden by making information easily accessible; no additional information being requested
E	2	End-uses where SNAP	No	Added to provide clarity on a frequently asked

Sect.	No.	Topic	Existing?	Explanation
		submission is not required for blends if blowing agents within a blend are already approved		question by potential submitters; ease burden by clearly identifying when it is not necessary to submit to SNAP; no additional information being requested

**Part VI: CLEANING SOLVENT-SPECIFIC INFORMATION**

Sect.	No.	Topic	Existing?	Explanation
A	1	Specific End-Use	Yes	Identified checklist of options to guide appropriate response to question and avoid confusion related to terminology “(d) Open or closed process?” added for clarity; no additional burden to submitter; ease burden of review process for closed systems because of limited potential for exposure
A	2	Additional End-Use Description	Yes	Provided guiding questions and examples to help submitter understand the information being requested by the Agency
A	3	Technology Changes and Costs	Yes	“(d) Ongoing operational cost of equipment” reworded for clarity and to provide separate entry for response
A	4	Production and Market Share	Yes	No change
A	5	Compatibility	Partially	Added request for information that is readily available to manufacturer; this testing is completed to provide information to customers. EPA uses the information to determine if there are constraints affecting the use of the solvent and/or to understand how a solvent may be particularly suitable for a niche use.
B	1	Physical and Chemical Properties	Yes	Clarified need for “(i) Henry’s Law Constant” because this information can help calculate relative volatility and exposure to solvents, similar to vapor pressure.
C	1	Flammability-Related Physical and Chemical Properties	Yes	No change
C	2	Flammability Concerns and Mitigation	Yes	No change
D	1, 2, 3	Exposure	Yes	Limited and reorganized questions to areas for which exposure is a pertinent concern for use of alternative as a cleaning solvent; limited to realistic and easy-to-understand exposure scenarios based on industrial use of cleaning solvent only

Sect.	No.	Topic	Existing?	Explanation
D	4	Training Materials Related to Use and Disposal	No	Because this use is for industrial-use only, added request for existing training materials related to use and disposal
D	n/a	Exposure	<i>Removed</i>	<i>Removed</i> questions on consumer exposure because this is not a concern for industrial cleaning solvent alternatives. <i>Removed</i> optional questions on general population exposure.

**Part VII: FIRE SUPPRESSION AND EXPLOSION PROTECTION-SPECIFIC INFORMATION**

Sect.	No.	Topic	Existing?	Explanation
A	1	Specific End-Use	Yes	Identified checklist of options to guide appropriate response to question and avoid confusion related to terminology “(c) Weight and volume equivalence ratio” moved from instructions into form “(d) Purpose of space” added to improve characterization of use and specify the information being requested by the Agency
A	2	Additional End-Use Description	Yes	Provided guiding questions and examples to help submitter understand the information being requested by the Agency
A	3	Technology Changes and Costs	Yes	“(d) Ongoing operational cost of equipment” reworded for clarity and to provide separate entry for response
A	4	Production and Market Share	Yes	No change
A	5	Application of Proposed Substitute	No	Added because this information is often requested after initial submission; information necessary to run models used by SNAP to assess environmental impacts
A	6	End-Use Specific Standards	Yes	Previously requested information on standards; added examples of standards to help submitter understand the information being requested by the Agency
B	1	Physical and Chemical Properties	Yes	(b) - (g) moved from instructions into form
B	2	Degradation Products	Yes	No change
C	1, 2, 3, 4, 5	Toxicity and Hazard Information	Yes	Specified toxicity testing necessary for application of fire suppression alternative; ease burden of submitter by avoiding unnecessary toxicity testing for existing chemicals in other sectors for which summary toxicity data is readily available
D	1, 2,	Exposure	Yes	Limited and reorganized questions to areas for which exposure is a pertinent concern for fire

Sect.	No.	Topic	Existing?	Explanation
	4			suppression agents; limited to realistic and easy-to-understand exposure scenarios based on where fire suppression agent is manufactured, installed, and used
D	3	Training Materials	No	Added request for existing training materials related to manufacture and installation of fire suppression equipment
D	n/a	Exposure	<i>Removed</i>	<i>Removed</i> optional questions on general population exposure

**Part VIII: AEROSOLS-SPECIFIC INFORMATION**

Sect	No.	Topic	Existing?	Explanation
A	1	Specific End-Use	Yes	Identified checklist of options to guide appropriate response to question and avoid confusion related to terminology
A	2	Additional End-Use Description	Yes	Provided guiding questions and examples to help submitter understand the information being requested by the Agency
A	3	Technology Changes and Costs	Yes	“(d) Ongoing operational cost of equipment” reworded for clarity and to provide separate entry for response
A	4	Production	Yes	No change
A	5	Market Share	Yes	No change
A	6	Application of Proposed Substitute	No	Added because this information is routinely requested after initial submission; information necessary to run models used by SNAP to assess environmental impacts
A	7	Consumer Use	Yes	Added direct question on occurrence of consumer exposure up front to ease burden of remainder of form and review process if alternative is not to be used in consumer uses
A	8	End-Use Specific Standards	Yes	No change
B	1	Physical and Chemical Properties	Yes	No change
C	1	Flammability-related Physical and Chemical Properties	Yes	“(d) Explosive Range (LEL/UEL)” requested because overpressure and explosions are safety concerns for aerosols
C	2	Flammability Concerns and Mitigation	Yes	No change
D	1, 2, 3, 4, 5	Exposure	Yes	Limited and reorganized questions to areas for which exposure is a pertinent concern for aerosols; limited to realistic and easy-to-understand exposure scenarios based on manufacture and use of aerosols products
D	6	Training Materials	No	Added request for existing training materials



Sect.	No.	Topic	Existing?	Explanation
				related to manufacture and installation of fire suppression equipment
D	n/a	Exposure	<i>Removed</i>	<i>Removed</i> optional questions on general population exposure

#### Part IX: STERILANTS-SPECIFIC INFORMATION

Sect.	No.	Topic	Existing?	Explanation
A	1	Specific End-Use	Yes	No change
A	2	Additional End-Use Description	Yes	Provided guiding questions and examples to help submitter understand the information being requested by the Agency
A	3	Technology Changes and Costs	Yes	“(d) Ongoing operational cost of equipment” reworded for clarity and to provide separate entry for response
A	4	Production and Market Share	Yes	No change
A	5	Application of Proposed Substitute	No	Added because this information is routinely requested after initial submission; information necessary to run models used by SNAP to assess environmental impacts
B	1	Physical and Chemical Properties	Yes	Reduced number of less physical and chemical properties requested to limit to those needed specifically for sterilants
C	1	Flammability-related Physical and Chemical Properties	Yes	“(d) Explosive Range (LEL/UEL)” requested because overpressure and explosions are safety concerns for sterilants
C	2	Flammability Concerns and Mitigation	Yes	No change
D	1, 2, 3	Exposure	Yes	Limited and reorganized questions to areas for which exposure is a pertinent concern for sterilants; limited to realistic and easy-to-understand exposure scenarios for workers only based on manufacture, use, and disposal of sterilants
D	3	Training Materials	No	Added request for existing training materials related to manufacture and disposal of sterilants
D	n/a	Exposure	<i>Removed</i>	<i>Removed</i> questions on general population exposure because general population exposure is not a concern for aerosols

#### Part X: ADHESIVES, COATINGS AND INKS-SPECIFIC INFORMATION

Sect.	No.	Topic	Existing?	Explanation
A	1	Specific End-Use	Yes	Identified checklist of options to guide appropriate response to question and avoid confusion related to terminology

Sect.	No.	Topic	Existing?	Explanation
A	2	Additional End-Use Description	Yes	Provided guiding questions and examples to help submitter understand the information being requested by the Agency
A	3	Technology Changes and Costs	Yes	“(d) Ongoing operational cost of equipment” reworded for clarity and to provide separate entry for response
A	4	Production and Market Share	Yes	No change
A	5	Application of Proposed Substitute	No	Added because this information is routinely requested after initial submission; information necessary to run models used by SNAP to assess environmental impacts
A	6	Consumer Use	Yes	Added direct question on occurrence of consumer exposure up front to ease burden of remainder of form and review process if alternative is not to be used in consumer uses
B	1	Physical and Chemical Properties	Yes	Clarified need for “(i) Henry’s Law Constant” because this information can help calculate relative volatility and exposure to adhesives, coatings, and inks, similar to vapor pressure.
C	1	Flammability-related Physical and Chemical Properties		“(c) Explosive Range (LEL/UEL)” requested because overpressure and explosions are safety concerns for adhesives, coatings, and inks
C	2	Flammability Concerns and Mitigation	Yes	No change
D	1, 2, 3, 4	Exposure	Yes	Limited and reorganized questions to areas for which exposure is a pertinent concern for aerosols; limited to realistic and easy-to-understand exposure scenarios based on manufacture and use of adhesives, coatings and inks
D	5	Information on Training Materials	No	Added request for existing training materials related to manufacture, filling and disposal of adhesives, coatings and inks
D	n/a	Exposure	<i>Removed</i>	<i>Removed</i> previous optional questions on general population exposure

**Part XI: TOBACCO EXPANSION-SPECIFIC INFORMATION**

Eased burden by removing all requests for information, because no additional information is needed for this sector.

**Part XII: ADDITIONAL INFORMATION**

New page provides room for any additional information the submitter would like to share with the Agency to inform SNAP’s understanding of the alternative and its use. Providing a page for this type of information within the form eases burden by not requiring preparation of a separate attachment.

**Part XIII: ATTACHMENTS**

No change.

**Part XIII: CERTIFICATION**

No change. Clarified instructions for electronic (CD/USB) submittal of form.