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From: Mattheisen, Mike
Sent: Tuesday, April 07, 2015 10:34 AM
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Subject: Comment on Proposed Renewal of Information Collection Request (ICR) Concerning Reporting of Health and Safety Studies to U.S. Environmental Protection Agency under Section 8(d) of the Toxic Substances Control Act

On March 30, 2015, the U.S. Environmental Protection Agency (EPA) published a notice in the Federal Register (80 FR 16672) announcing that EPA intends to submit an existing Information Collection Request (ICR) that is scheduled to expire in November 2015 to the Office of Management and Budget (OMB) for renewal, and requesting public comment. ("Agency Information Collection Activities; Proposed Renewal and Comment Request; Health and Safety Data Reporting, Submission of Lists and Copies of Health and Safety Studies." EPA ICR No. 0575.15; OMB Control No. 2070-0112. See <http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OPPT-2014-0734-0001>.) The ICR applies to section 8(d) of the Toxic Substances Control Act (TSCA), which authorizes EPA to issue rules requiring chemical manufacturers, processors, and distributors to submit lists and copies of health and safety studies to EPA. TSCA section 8(d) is implemented by regulations published in the Code of Federal Regulations (CFR) at 40 CFR Part 716.

In addition to the public comment requested by the Federal Register notice, OMB regulations at 5 CFR 1320.8(d)(1) require agencies to consult with potential respondents and data users about specific aspects of an ICR. As part of this required consultation, I am contacting you to solicit your input. (Please note that if you take this opportunity to provide input, your name, affiliation, e-mail address, phone number and any information you provide (e.g., copies of e-mails) 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.)

EPA solicits your input on the following questions:

- Are the unpublished studies that EPA seeks under this ICR available from any public source, or already collected by another EPA office or by another agency?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 they be found?
- Is it clear what lists and studies are required to be submitted? If not, are there any suggestions for clarifying instructions?
- Studies are required to be submitted electronically through EPA's Central Data Exchange (CDX). Is EPA's CDX a good method, or is there a better alternative?
- Do you have any concerns about the submission of confidential business information (CBI)?
- 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 (including the economic analysis), and any public comments received, go to www.regulations.gov and search using EPA-HQ-OPPT-2014-0734. Click on any of the documents listed within the docket to read the document.

If you have any comments in response to the above questions, or with respect to any other part of this ICR, please respond by return e-mail by COB on Wednesday, May 29, 2015. EPA will consider those 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.

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