

## Mattheisen, Mike

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**From:** Mattheisen, Mike  
**Sent:** Wednesday, October 28, 2015 2:51 PM  
**To:** Scott\_Jensen@americanchemistry.com; 'gainesj@socma.com'; 'daniel.a.turner@dupont.com'; 'wohlschlegele@api.org'; 'MSCANLAN@vermontlaw.edu'; 'stacy@aafa.org'; 'sstein@edf.org'; 'ken@ewg.org'; 'eheyd@nrdc.org'  
**Subject:** Request for Assistance; Public Comment on the Proposed Renewal of an Information Collection Request (ICR) Concerning Reporting Chemical Export Information to the U.S. EPA under Section 12(b) of TSCA.

On October 28, 2015, the U.S. Environmental Protection Agency (EPA) published a notice in the Federal Register (80 FR 66000) announcing that EPA intends to submit an existing Information Collection Request (ICR) that is scheduled to expire in August 2016 to the Office of Management and Budget (OMB) for renewal, and requesting public comment. The ICR applies to section 12(b) of the Toxic Substances Control Act (TSCA), which requires any person who exports or intends to export a chemical substance or mixture that is regulated under TSCA sections 4, 5, 6 and/or 7 to notify EPA of such export or intent to export. This requirement is described in more detail at 40 CFR part 707, subpart D. Upon receipt of notification, EPA advises the government of the importing country of the U.S. regulatory action that required the notification with respect to that substance. EPA uses the information obtained from the submitter via this collection to advise the government of the importing country. ("Agency Information Collection Activities; Proposed Renewal of the Collection under OMB Control No. 2070-0030, EPA ICR No. 0795.15; Comment Request." See, <http://www.gpo.gov/fdsys/pkg/FR-2015-10-28/pdf/2015-27470.pdf>.)

In addition to the public comment requested by the notice in the Federal Register, 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:

1. Are the data that are required to be submitted under this ICR available from any other public source that you are aware of, or are they data already collected by another EPA office or by another agency? If so, where is the data publicly available?
2. Is the data submission requirement clear? If not, do you have any suggestions for how the data submission can be clarified?
3. Data is required to be submitted to the Document Control Office (DCO) at EPA Headquarters in Washington, D.C., by hand or by U.S. Postal Service. Is this a good method, or is there a better alternative?
4. Do you have any concerns about the submission of confidential business information (CBI)?
5. Do you agree with EPA's estimated burden and costs? (ICRs address 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, please 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](http://www.regulations.gov) and search using EPA-HQ-OPPT-2015-0435. 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 Monday, December 28, 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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