

Date: August 2, 2016

From: David Brooks ([brooks.david@epa.gov](mailto:brooks.david@epa.gov))

To: [Addressees]

Subject: Request for Assistance; Renewal of "EPA Information Collection Request (ICR) No. 0794.16, OMB Control No. 2070-0046, "Notification of Substantial Risk of Injury to Health and the Environment under TSCA Sec. 8(e)<sup>1</sup>"

On July 5, 2016, EPA published a Notice in the Federal Register (81 FR 43601) titled "Agency Information Collection Activities; Proposed Collection; Comment Request; EPA Information Collection Request (ICR) No. 0794.16, OMB Control No. 2070-0046, "Notification of Substantial Risk of Injury to Health and the Environment under TSCA Sec. 8(e)"<sup>1</sup> (See <https://www.regulations.gov/docket?D=EPA-HQ-OPPT-2015-0744>). This Notice refers to EPA's intention to request renewed Office of Management and Budget (OMB) clearance of an information collection related to any person who manufactures, [imports,] processes, or distributes in commerce a chemical substance or mixture and who obtains information which reasonably supports the conclusion that such substance or mixture presents a substantial risk of injury to health or the environment shall immediately inform the [EPA] Administrator of such information unless such person has actual knowledge that the Administrator has been adequately informed of such information.

In addition to public notice and comment requirement that the above Notice initiates, OMB regulations at 5 CFR 1320.8(d)(1)) require agencies to consult with potential respondents and data users about specific aspects of an information collection request (ICR) before submitting it to OMB for review and approval, regardless, in the case of ICR renewals, of whether changes have or have not been made to the collection activity.

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 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.

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

- o [www.regulations.gov/](http://www.regulations.gov/)
- o enter EPA-HQ-OPPT-2015-0744 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..."

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 September 5, 2016. 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.

Thank you for your assistance.

Sincerely yours,

David Brooks, Microbiologist  
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