

Sent: January 3, 2017
From: Carmichael, Lea
To: [Addressees]
Subject: Renewal of Information Collection Request for the EPA Worker Protection Rule

Good afternoon,

On January 3, 2017, the U.S. Environmental Protection Agency (EPA) published a Notice in the Federal Register entitled: Agency Information Collection Activities; Proposals, Submissions, and Approvals. This Notice explains EPA's intention to request renewed Office of Management and Budget (OMB) clearance of an information collection related to reporting and/or recordkeeping requirements under the EPA Worker Protection Rule. You can access the Federal Register notice at <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2016-0264-0001>.

The Worker Protection Rule incorporates Occupational Safety and Health Administration (OSHA) asbestos standards, which require employers to protect employees from asbestos exposure, and extends those requirements to states without an OSHA approved plan in order to provide the same protections for state and local government employees. On November 15, 2000, EPA finalized the revision of the Asbestos Worker Protection Rule. As required by OMB, EPA is required to renew its ability to collect such information every three years.

In addition to public notice and comment, 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. Additionally, the OMB Desk Examiner for this ICR may contact you to verify the accuracy of any comments EPA identifies.

EPA solicits your input on the following questions:

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, can you provide any suggestions for clarifying instructions?
3. Would you be interested in an electronic data submission option? If so, which type of alternative would you most likely utilize?
4. For electronic submission, how should signature requirements be handled?

5. How does the Toxic Substances Control Act (TSCA) Confidential Business Information (CBI) affect your choice or use of an electronic medium? Would you be more inclined to submit TSCA CBI electronically than on paper, and if so, what benefits would you realize (e.g., burden reduction, greater efficiency in compiling information, etc.)?

6. 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 consider the BLS labor rates used by EPA to be inaccurate or inappropriate, explain your rationale.

If you have any comments in response to the above questions, or with respect to any other part of the information collection, they would be greatly appreciated.

Please respond via return e-mail no later than February 15, 2017. EPA will consider your feedback, as well as any public comments received in response to the Federal Register Notice identified above, in preparing a final document for OMB review.

Thank you in advance for your assistance and participation.

Sincerely,

Lea Carmichael, Environmental Protection Specialist
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Office of Prevention, Pesticides and Toxic Substances
U.S. Environmental Protection Agency
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