Date: August 1, 2018

From: Adam Ross/DC/USEPA/US

To: Mike Walls, Vice President

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Bill Allmond, Director Government Relations Society of Chemical Manufacturers and Affiliates Formerly the Synthetic Organic Chemical Manufacturers Association. (SOCMA) allmondb@socma.com Subject: Request for Assistance on Renewal of Information Collection Request:

"Premanufacture Review Reporting and Exemption Requirements for New Chemical Substances and Significant New Use Reporting Requirements for Chemical Substances" (EPA ICR No. 0574.18; OMB Control No. 2070-0012)

On July 25, 2018, EPA published a Notice in the Federal Register (83 Fed. Reg. 35269) titled "Agency Information Collection Activities; Proposed Renewal of Existing Collection (EPA ICR No. 0574.18); Comment Request" for the information collection request relating to "Premanufacture Review Reporting and Exemption Requirements for New Chemical Substances and Significant New Use Reporting Requirements for Chemical Substances" (OMB Control No. 2070-0012) (See: https://www.regulations.gov/document?D=EPA-HQ-OPPT-2017-0645-0001.) This Notice refers to EPA's intention to request renewed Office of Management and Budget (OMB) clearance of an information collection request related to premanufacture and significant new use notice requirements for new chemicals under TSCA Section 5.

In addition to requesting 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. 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?

Do you agree with EPA's estimated burden and costs? 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.

Do you believe EPA accurately estimated the burden for the newly published document "Points to Consider When Preparing TSCA New Chemical Notifications"? Would you add any

additional bases for estimating the burden from this document (i.e. additional time spent beyond review of the document)?

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

- www.regulations.gov/
- Enter EPA-HQ-OPPT-2017-0645-0001in the Enter Keyword or ID field
- Click on "Search"
- Then click on any of the documents listed within the docket to read them; you likely 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 24, 2018. 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,

Adam Ross, Program Attorney
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