

## **Supporting Statement for an Information Collection Request (ICR) Under the Paperwork Reduction Act (PRA)**

### **1. EXECUTIVE SUMMARY**

#### **1(a). Identification of the Information Collection – Title and Numbers**

**Title:** Regulation of Persistent, Bioaccumulative, and Toxic Chemicals under TSCA Section 6(h) (Proposed Rule; RIN 2070-AK34)

**ICR Numbers:** EPA ICR No.: **2599.01**; OMB Control No.: 2070-NEW.

**EPA Form Numbers:** No required forms for ICR activities

**Docket ID Number:** EPA-HQ-OPPT-2019-0080.

#### **1(b). Docket Information**

The information collection request (ICR) that explains the information collection activities and related burden and cost estimates, as well as other supporting documents related to the ICR, are available in the docket established for the rulemaking. The docket can be viewed online at <http://www.regulations.gov> or in person at the EPA Docket Center, West William Jefferson Clinton Bldg., Rm. 3334, 1301 Constitution Ave., NW., Washington, DC. The telephone number for the Docket Center is (202) 566-1744. For additional information about EPA's public docket, visit <http://www.epa.gov/dockets>.

#### **1(c). ICR Status**

This is a new ICR that addresses the information collection activities that are contained in a proposed rule. Under the Paperwork Reduction Act (PRA), 44 U.S.C. 3501 et seq., an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information, unless it displays a currently valid control number issued by the Office of Management and Budget (OMB). The OMB control numbers are displayed either by publication in the Federal Register or by other appropriate means, such as on the related collection instrument or form, if applicable. The display of OMB control numbers for certain EPA regulations is consolidated in 40 CFR part 9.

Before submitting an ICR to OMB for review and approval under the PRA, an agency must solicit comments pursuant to PRA §3506(c)(2)(A) and [5 CFR 1320.8\(d\)\(1\)](#). After considering comments received on the draft ICR, the agency must submit the ICR to OMB for review and approval according to the procedures prescribed in [5 CFR 1320.12](#). In announcing the submission of the final ICR to OMB for review and approval, the agency must provide another opportunity for public review and comments on the revised ICR pursuant to 5 CFR 1320.12(c).

#### **1(a). Abstract**

The Environmental Protection Agency (EPA) is proposing a rule under section 6(h) of the Toxic Substances Control Act (TSCA) concerning prohibitions and restrictions on four chemical substances. These chemical substances are decabromodiphenyl ether (DecaBDE) (Chemical Abstract Services Number (CASRN) 1163-19-5), phenol, isopropylated phosphate (3:1) (PIP

(3:1)) (CASRN 68937-41-7), 2,4,6-tris(tert-butyl)phenol (2,4,6-TTBP) (CASRN 732-26-3), and pentachlorothiophenol (PCTP) (CASRN 133-49-3).

For DecaBDE, the proposed rule would prohibit the manufacture (including import), processing, and distribution in commerce of DecaBDE, and products and articles to which DecaBDE has been added except for the following:

- Processing and distribution in commerce for recycling of plastic from products or articles containing DecaBDE, where no DecaBDE is added during the recycling process;
- Processing and distribution in commerce of DecaBDE in finished products or articles made of plastic recycled from products or articles containing DecaBDE, where no DecaBDE was added during the production of the products or articles made of recycled plastic;
- Replacement parts for automobiles and other motor vehicles and aircraft and aerospace vehicles to which DecaBDE has been added;
- Manufacture, processing, and distribution in commerce for use in new aerospace parts for a period of three years; and
- Manufacture, processing, and distribution in commerce for use in curtains in the hospitality industry for a period of 18 months.

Each person who manufactures, processes, or distributes in commerce DecaBDE, and products and articles to which DecaBDE has been added, would be required to keep for 3 years ordinary business records that demonstrate compliance with the prohibitions, restrictions, and other provisions of the rule.

For PIP (3:1), the proposed rule would prohibit processing and distribution in commerce of the chemical substance, and products containing the chemical substance except for the following:

- Processing and distribution in commerce for use in aviation hydraulic fluid;
- Processing and distribution in commerce for use in lubricants and greases; and
- New and replacement parts for automobiles and other motor vehicles to which PIP (3:1) has been added.

In addition, the proposed rule would prohibit releases to water from the remaining processing, distribution in commerce, and commercial use activities. Persons manufacturing, processing, and distributing PIP (3:1), and products containing PIP (3:1), in commerce would be required to notify their customers of these restrictions. In addition, manufacturers, processors, and distributors would be required to keep for 3 years ordinary business records that demonstrate compliance with the prohibitions, restrictions, and other provisions of the rule, including records demonstrating that notification to their customers was provided.

For 2,4,6-TTBP, the proposed rule would prohibit the distribution in commerce of 2,4,6-TTBP and products containing 2,4,6-TTBP in any container with a volume of less than 55 gallons, in order to effectively prevent the use of 2,4,6-TTBP as a fuel additive or fuel injector cleaner by consumers. In addition, the processing and distribution in commerce of 2,4,6-TTBP, and products containing 2,4,6-TTBP, for use as an oil or lubricant additive would be prohibited, regardless of container size. Distributors of 2,4,6-TTBP would be required to keep for 3 years ordinary business records that demonstrate compliance with the prohibitions, restrictions, and other provisions of the rule.

For PCTP, the proposed rule would prohibit the manufacture (including import), processing, and distribution in commerce of PCTP, and products containing PCTP, in concentrations that exceed 1% by weight. Manufacturers, processors, and distributors of PCTP would be required to keep for 3 years ordinary business records that demonstrate compliance with the prohibition.

EPA is proposing this rule under section 6(h) of TSCA, which requires expedited action under TSCA section 6(a) for PBT chemicals that meet certain statutory criteria and human and environmental exposure to which is likely. The statute also requires EPA to issue a proposed rule by June 22, 2019, and a final rule no later than 18 months after the proposal.

The portions of the proposed rule that trigger this Information Collection Request (ICR) consist of a downstream notification of the prohibitions in the rule for PIP (3:1) and a recordkeeping requirement for all four PBT chemicals proposed to be regulated.

*Legal authority:* The Toxic Substances Control Act (TSCA), 15 U.S.C. §§2605(a) and 2605(h).

*Respondents/affected entities:* Entities potentially affected by this ICR include persons that manufacture, process, or distribute in commerce DecaBDE, PIP (3:1), 2,4,6-TTBP, or PCTP for any use.

*Respondent's obligation to respond:* Respondents are not obligated to respond or report to EPA.

*Confidentiality of responses:* Not applicable. No information is submitted to EPA.

*Estimated total number of potential respondents:* 81

*Frequency of response:* On occasion to third parties as needed.

*Estimated total annual burden:* 50.2 hours. Burden is defined at 5 CFR 1320.3(b).

*Estimated total annual costs:* \$3,940

*Changes in the estimates:* Not applicable. This is a request for a new OMB Control Number.

## **2. NECESSITY OF THE INFORMATION COLLECTION**

### **2(a). Related Legal and/or Administrative Requirements**

**TSCA** – Section 6(h) of TSCA (15 U.S.C. § 2605(h)) directs EPA to take action under section 6(a) on certain PBT chemical substances. Under section 6(h), EPA must address risks and reduce exposure to these PBT chemicals to the extent practicable. Section 6(a) authorizes EPA to:

- (1) Prohibit or limit manufacture, processing, or distribution in commerce;

- (2) Prohibit or limit the manufacture, processing, or distribution in commerce of the chemical substance above a specified concentration;
- (3) Require minimum warnings and instructions with respect to use, distribution, or disposal;
- (4) Require manufacturers or processors to make and retain records;
- (5) Prohibit or regulate any manner of commercial use;
- (6) Prohibit or regulate any manner of disposal; and/or
- (7) Require manufacturers or processors to give notice of the unreasonable risk of injury, and to recall products if required.

The proposed rule's provisions are described in the previous section.

## **2(b). Necessity of the Information Collection**

The information collection activities covered by this ICR are necessary in order to enhance the exposure reductions that are directed by section 6(h).

Without the downstream notification requirement for PIP (3:1), there is a greater likelihood that non-prohibited uses of PIP (3:1) could be diverted to the prohibited use and that users would be buying materials that they do not realize contain PIP (3:1) because they would not be aware of the prohibitions. This could result in inadequate exposure reductions. In order to ensure awareness of the prohibitions and improve the likelihood PIP (3:1) and products containing PIP (3:1) are not used in applications where its use is prohibited under the proposed rule, the manufacturers, importers, processors, and distributors of products that contain PIP (3:1) designed for uses that are not prohibited will be required to notify downstream purchasers about the uses that are prohibited. Downstream notification will also be necessary for effective enforcement of the rule as it provides a record of notification on use restrictions down the supply chain via Safety Data Sheet. Safety Data Sheets are already required by the Occupational Safety and Health Administration (OSHA). Therefore, this additional information should not substantially increase the burden on these companies.

EPA also has authority under section 6 of TSCA to require recordkeeping related to the regulatory requirements imposed by EPA. This is important where, as here, such records and reports are necessary for effective enforcement of the section 6 rule.

## **2(c). Uses, Users, and Purpose of the Information Collection**

EPA. This information collection will provide EPA with information only upon inspection of such materials. There are no reporting requirements to submit information to EPA under the information collection activities.

Downstream Companies. Under the proposed rule, manufacturers, processors, and distributors of PIP (3:1) must notify companies downstream upon shipment of PIP (3:1) about the prohibited use under the proposed rule. The information submitted to downstream companies would provide knowledge and awareness of the prohibited use to these companies.

The regulated entities would also compile and retain records that are necessary as a reference for EPA or authorized entities. These records demonstrate that the entities throughout the PIP (3:1) supply chain are aware of the prohibitions and that companies upstream can show what

entities they supply to and therefore what entities they would need to notify of the prohibitions. The records compiled and maintained by the regulated entities would also demonstrate compliance with the use restrictions and distribution requirements for all 4 of the chemical substances subject to the proposal. These recordkeeping requirements are necessary to permit the EPA to conduct its enforcement activities and to ensure compliance within the regulated community.

### **3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

#### **3(a). Non-Duplication**

EPA's collection pursuant to the section 6(a) regulations do not duplicate any other collection. There is no other Federal program that requires the information collection activities related to the prohibitions under the proposed rule.

#### **3(b). Public Notice Required Prior to ICR Submission to OMB**

The notice of proposed rulemaking serves as the public notice for this ICR. Interested parties should submit comments referencing Docket ID No. EPA-HQ-OPPT-2019-0080 to the address listed at the end of this document. Responses will be taken into account in developing the final rulemaking.

#### **3(c). Consultations**

In September 2017, EPA held a public meeting via webinar on TSCA section 6(h) and the 5 chemical substances that EPA had preliminarily determined met the statutory criteria (with the exception of the exposure criterion). In November 2017, EPA participated in a roundtable discussion with small businesses hosted by the Small Business Administration.

EPA also met with state and local officials early in the process of developing the proposed action. In October 2017, EPA made a presentation on TSCA section 6(h) and the 5 chemical substances to state and local government officials participating in a regularly-scheduled quarterly conference call on TSCA topics.

EPA also consulted with tribal officials during the development of this action. EPA consulted with representatives of Tribes via teleconference on August 31, 2018, and September 6, 2018, concerning the prospective regulation of the 5 identified PBT chemicals under TSCA section 6(h). Tribal members were encouraged to provide additional comments after the conference, and EPA received two comments. EPA also met with the National Tribal Toxics Council (NTTC) in Washington, DC and via teleconference. During the NTTC meeting, EPA provided background information on the available regulatory options under 6(a) and a summary of the information gathered on the five PBT chemicals. Officials from NTTC expressed support for EPA regulations to reduce exposures to the general population and susceptible subpopulations. Information pertaining to the tribal consultations can be found in the public docket (Docket EPA-HQ-OPPT-2019-0080).

### **3(d). Effects of Less Frequent Collection**

Due to the nature of the triggering events that initiate information collection activities under the proposed rule, less frequent collection is not feasible. The proposed rule only includes reporting information to third parties and does not require reporting information to EPA.

### **3(e). Small Entity Flexibility**

EPA believes that the downstream notification and recordkeeping requirements do not unduly burden small businesses. EPA concludes that the proposed rule has no significant impacts on any of the entities subject to downstream notification as firms subject to this requirement have a cost-revenue impact of less than 1 percent.

### **3(f). General PRA Related Guidelines**

This ICR is consistent with OMB's general guidelines. Records that would be required by this proposed rule would have to be maintained for 3 years. Therefore, this ICR does not exceed the Paperwork Reduction Act guidelines at 5 CFR 1320.5.

### **3(g). Confidentiality**

EPA will not be collecting any information. Therefore, confidential information will not be submitted to EPA.

### **3(h). Sensitive Questions**

The information collection activities do not include questions of a sensitive nature.

## **4. AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

### **4(a). Agency Activities**

There will be no agency collection activities under the proposed rule. There will only be third party notification and recordkeeping requirements.

### **4(b). Estimated Agency Costs**

This collection requires third party notification and recordkeeping. EPA will not receive or process any information as a result of the collection. Therefore, EPA estimates that it costs the Agency approximately \$0 to carry out the activities associated with the information collection activities covered by this ICR.

#### **4(b)(i). Collection Schedule**

There is no collection of information by EPA included under the proposed rule. Therefore, collections occur only by third parties and will occur as needed via Safety Data Sheet.

#### **4(b)(ii). Use of Technology to Facilitate Collection Activities**

There will be no information collection by EPA. Therefore, there is no need for any technology facilitation under the proposed rule related to information collection activities. The recordkeeping requirement does not specify a particular technology or method of retaining the required information. The collection of information by third parties will occur via Safety Data Sheet.

### **5. The RESPONDENTS AND INFORMATION COLLECTION (IC) ACTIVITIES**

For each respondent category, this section of the ICR describes the respondents, the information collection activities and related estimates for burden and costs associated with those activities.

#### **5(a). Methodology for Estimating Respondent Burden and Costs**

The collection specifies third party notification and/or recordkeeping requirements on persons who manufacturer, process, or distribute the four chemicals subject to the proposed rule. The North American Industrial Classification System (NAICS) codes associated with industries most likely affected by the proposed rule's paperwork requirements are described below:

313320	Fabric Coating Mills
324110	Petroleum Refineries
324191	Petroleum Lubricating Oil and Grease Manufacturing
325110	Petrochemical Manufacturing
325199	All Other Basic Organic Chemical Manufacturing
325211	Plastics Material and Resin Manufacturing
325510	Paint and Coating Manufacturing
325520	Adhesive Manufacturing
325612	Polish and Other Sanitation Good Manufacturing
325991	Custom Compounding of Purchased Resins
325998	All Other Miscellaneous Chemical Product and Preparation Manufacturing
326113	Unlaminated Plastics Film and Sheet (except Packaging) Manufacturing
326130	Laminated Plastics Plate, Sheet (except Packaging), and Shape Manufacturing
326150	Urethane and Other Foam Product (except Polystyrene) Manufacturing
326199	All Other Plastics Product Manufacturing
331420	Copper Rolling, Drawing, Extruding, and Alloying
333112	Lawn and Garden Tractor and Home Lawn and Garden Equipment Manufacturing
334220	Radio and Television Broadcasting and Wireless Communications Equipment
334290	Other Communications Equipment Manufacturing
335929	Other Communication and Energy Wire Manufacturing
336111	Automobile Manufacturing
336411	Aircraft Manufacturing
339113	Surgical Appliance and Supplies Manufacturing
339920	Sporting and Athletic Goods Manufacturing
423110	Automobile and Other Motor Vehicle Merchant Wholesalers
423120	Motor Vehicle Supplies and New Parts Merchant Wholesalers

423620	Household Appliances, Electric Housewares, and Consumer Electronics Merchant
423910	Sporting and Recreational Goods and Supplies Merchant Wholesalers
423920	Toy and Hobby Goods and Supplies Merchant Wholesalers
424340	Footwear Merchant Wholesalers
424690	Other Chemical and Allied Products Merchant Wholesalers
424720	Petroleum and Petroleum Products Merchant Wholesalers (except Bulk Stations and Terminals)
424910	Farm Supplies Merchant Wholesalers
441110	New Car Dealers
442110	Furniture Stores
448130	Children's and Infant's Clothing Store
451120	Hobby, Toy, and Game Stores
523910	Miscellaneous Intermediation
532289	All Other Consumer Goods Rental

The proposed rule would require that each person subject to the rule maintain records for a period of 3 years that demonstrate compliance with the requirements of the rule. In addition, the rule would require downstream notification related to PIP (3:1). Persons who manufacture, process, and distribute PIP (3:1) to notify companies to whom PIP (3:1) is shipped that the processing and distribution in commerce of PIP (3:1) for any use is prohibited except for the following uses: (1) aviation hydraulic fluid; (2) lubricants and greases; and (3) new and replacement parts in the automotive industry.

### Number of Entities Affected

EPA developed estimates for number of manufacturers (including importers), processors, and distributors affected, based on EPA's Public 2016 Chemical Data Reporting (CDR) data (EPA 2017) and EPA's 2017 Toxics Release Inventory Program dataset (EPA 2018). Details about this estimation can be found in the economic analysis for the proposed rulemaking (Docket ID No. EPA-HQ-OPPT-2019-0080). Note that some entities are associated with more than one chemical or role, thus the total (showing unique entities) does not sum.

<b>Chemical</b>	<b>Total Manufacturers, Processors and Distributors Identified</b>
DecaBDE	45
PCTP	6
PIP (3:1)	29
2,4,6-TTBP	12
<b>TOTAL</b>	<b>81</b>
<b>Note:</b> Total does not sum because of overlap between chemicals.	

### Rule Familiarization Burden

EPA assumes that each manufacturer (including importers), processor, and distributor of products that contain the regulated chemicals will spend a half an hour (0.5 hours) becoming



familiar with the requirements of the rule and developing an understanding of what actions are necessary to comply with the downstream notification and recordkeeping requirements. EPA conservatively assumes that this is an annually recurring cost, to account for staff turnover and other changes at the company which may require a regularly updated understanding of rule requirements.

### Downstream Notification Burden

Downstream notification is considered a third-party notification. EPA estimates that downstream notification is accomplished through an annotation to already existing chemical SDSs that each manufacturer, distributor, or importer provides to downstream users under the Hazard Communication Standard (HCS) (29 CFR 1910.1200). Therefore, burden to amend the SDS is estimated as a one-time burden.

For PIP (3:1), EPA estimates that it will require 1 hour of technical labor for each affected manufacturer, importer, and processor of PIP (3:1) and products that contain PIP (3:1) to make the necessary annotations to the SDSs. This burden is a one-time burden. That is, once an SDS is annotated, the action would not need to be repeated. EPA was unable to estimate the potential for new products to enter the market which might require annotation of additional SDSs over the time period of the ICR. The burden is estimated to occur during the first year of the ICR only. To develop an estimate of average annual burden across the time period of the ICR, EPA divided the burden per response equally across the three years. Therefore, average burden per respondent for each year is calculated as  $1 \text{ hour}/3 \text{ years} = .33 \text{ hours/year}$ .

### Recordkeeping Burden

Under the proposed rule, manufacturers (including importers), processors and distributors of the chemicals subject to the rule must obtain and retain, for a period of 3 years from the date the record is generated, ordinary business records, such as bills of lading, invoices, or comparable documents which demonstrate compliance with this rule.

Firms are likely to keep these records as part of their customary business practices. For example, the Internal Revenue Service recommends that firms keep invoices in order to document their assets, expenses, gross receipts, and purchases (U.S. Internal Revenue Service 2015) Therefore, the recordkeeping requirements are not assumed to impose any additional burden on these firms.

### Costs

EPA assumes no direct costs are associated with this collection. Labor costs are based on fully loaded wage rates. The estimated professional wage rate for manufacturers (including importers), processors and distributors is \$78.63, which was estimated as shown in **Table 5-2**.

<b>Table 5-2: Technical Wage Rates</b>							
<b>Labor Category</b>	<b>Data Sources</b>	<b>Date</b>	<b>Wage1</b>	<b>Fringes as % Wage<sup>1</sup></b>	<b>Over-head % wage<sup>2</sup></b>	<b>Fringe + Overhead Factor</b>	<b>Loaded Wages</b>
Professional / Technical	BLS ECEC, Private Manufacturing industries, "Professional and related"	18-Sept	\$46.60	52%	17%	1.69	\$78.63
<b>Source(s):</b> <sup>1</sup> Employer Costs for Employee Compensation Supplementary Tables: Sept 2018 (BLS 2018) <b>Note(s):</b> <sup>2</sup> An overhead rate of 17% is used based on assumptions in Wage Rates for Economic Analysis of the Toxics Release Inventory Program (Rice, C. 2002) Values in table may not sum due to rounding							

## 5(b). Information Collections

### IC #1: PBT downstream notification and recordkeeping activities

This Information Collection would be required for the proposed rule for Persistent, Bioaccumulative, and Toxic Chemicals. Respondent NAICS Codes associated with industries most likely affected by the paperwork requirements are listed in section 5(a).

#### Information Collection Activities

Under the proposed rule, EPA imposes downstream notification requirements on manufacturers, processors, and distributors of PIP (3:1); and limited recordkeeping requirements on manufacturers, processors, and distributors of all the PBT chemicals proposed to be regulated. For PIP (3:1), the proposed rule would require that each person who manufactures (including imports), processes, or distributes in commerce PIP (3:1) for non-prohibited uses to notify companies to whom the chemical was shipped of the prohibitions under the rule, via the SDS. Additionally, manufacturers (including importers), processors and distributors of the chemicals subject to the rule must obtain and retain, for a period of 3 years from the date the record is generated, ordinary business records, such as bills of lading, invoices, or comparable documents that demonstrate compliance with this rule.

In addition to the requirements, EPA also expects that each manufacturer (including importers), processor, and distributor of the regulated chemicals will incur burden becoming familiar with the requirements of the rule and developing an understanding of what actions are necessary to comply with the downstream notification and recordkeeping requirements.

Details on the burden estimate calculations per activity are presented in section 5(a). The table below presents the estimated average annual burden for each activity.

Activity/Respondent	Number of Respondents	Annual Burden per Response (hours)	Total Annual Burden (hours)	Annual Cost
Rule Familiarization / all	81	0.50	40.5	\$3,180
Downstream Notification / PIP (3:1)	29	0.33	9.67	\$760
Recordkeeping / all	81	0	0	\$0
<b>TOTAL</b>			<b>50.2</b>	<b>\$3,940</b>

## 6. PRA Burden Statement

Under the PRA, burden is defined at [5 CFR 1320.3\(b\)](#).

This is a new, rule-related information collection. Under the proposed rule for PBT chemicals, the total burden requested for this ICR is 50.2 hours per year, or 150.5 hours over the 3-year ICR period. The total annual cost burden requested for this ICR is \$3,940 per year or \$11,800 over the 3-year ICR period. According to the Paperwork Reduction Act, “burden” means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. For this collection it includes such activities as annual familiarization with requirements, recordkeeping, and notification requirements. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA’s regulations in title 40 of the CFR, after appearing in the Federal Register, are listed in 40 CFR part 9 and included on the related collection instrument or form, if applicable.

The Agency has established a docket for this rulemaking, which includes this rule related ICR, under Docket ID No. EPA-HQ-OPPT-2019-0080, which is available for online viewing at <http://www.regulations.gov>, or in-person viewing at the EPA Docket Center (EPA/DC), EPA William Jefferson Clinton West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Pollution Prevention and Toxics Docket is (202) 566-0280.

You may submit comments regarding the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden, including the use of automated collection techniques. Comments, referencing Docket ID No. EPA-HQ-OPPT-2019-0080 and OMB Control No. 2070-NEW (EPA ICR No. **2599.01**), may be submitted to the OPPT Docket, Environmental Protection Agency Docket Center (EPA/DC), Mail code: 28221T, 1200 Pennsylvania Ave., NW, Washington, DC 20460 and to OMB, addressed to “OMB Desk Officer for EPA” and referencing OMB Control No. 2070- NEW (EPA ICR No. **2599.01**), via email to [oir\\_submission@omb.eop.gov](mailto:oir_submission@omb.eop.gov).

## References

- Rice, C. (2002). Wage Rates for Economic Analysis of the Toxics Release Inventory Program. In Office of Environmental Information: U.S. Environmental Protection Agency (Ed.).
- U.S. Bureau of Labor Statistics (BLS). (2018). *Employer Costs for Employee Compensation Supplementary Tables, September 2018*.
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- U.S. Internal Revenue Service. (2015). *Starting a Business and Keeping Records*.