

Request for Approval under the “Generic Clearance for TSCA Section 4 Test Rules, Test Orders, Enforceable Consent Agreements (ECAs), Voluntary Data Submissions, and Exemptions from Testing Requirement” (OMB Control Number: 2070-0033)

TITLE OF INFORMATION COLLECTION:

Initial Response, Test Rules

DESCRIPTION OF INFORMATION COLLECTION:

For more information about this Information Collection, including description of respondents, need for this collection, and more details of respondent activities, please refer to the Supporting Statement for this generic Information Collection Request (ICR). The letter of intent is an initial response made by respondents after EPA promulgates a test rule and it formally acknowledges that the respondent intends to sponsor required testing under the rule. An entity subject to a test rule may apply for an exemption from one or all of the testing requirements imposed in a test rule if that testing will be, or has been, performed by another entity subject to the rule.

It is difficult to predict how many exemption applications might be submitted to EPA in any one year. EPA changes this assumption to a per-chemical basis at three per chemical undergoing testing, or one annually.¹ The new assumption is incorporated for ease of future maintenance as the number of exemptions is expected to vary according to the number of chemicals tested in actions. EPA also assumes that each application would request exemption from all tests.

TOTAL ANNUAL BURDEN:

Activity	Adjusted Unit Burden (hours)	Number of Respondents (Sponsors) ¹	Number of Responses (Chemicals Tested within an Action)	Overlap Factor	Total Burden (hours)	Total Labor Cost	Total Non-Labor Cost	Total Cost
Letter of Intent	0.333	3.50	3.50	2.8	3.263	\$249.02	\$0.00	\$249.02
Subtotal, Letter of Intent Total	0.333	3.50	3.50	2.8	3.263	\$249.02	\$0.00	\$249.02
OR								
Prepare Exemption Application	2.000	3.50	3.50	2.8	19.600	\$1,495.87	\$0.00	\$1,495.87
Corporate Review	6.000	3.50	3.50	2.8	58.800	\$4,709.29	\$0.00	\$4,709.29
Subtotal, Exemption Application Reporting	8.000	3.50	3.50	2.8	78.400	\$6,205.16	\$0.00	\$6,205.16
Subtotal, Recordkeeping	0.500	3.50	3.50	2.8	4.900	\$169.05	\$0.00	\$169.05
Subtotal, Exemption Application	8.5	3.50	3.50	2.8	83.300	\$6,374.21	\$0.00	\$6,374.21
Overall Total, Initial Response including	4.166	7.00	7.00	2.8	81.663	\$6,454.18	\$0.00	\$6,454.18

¹ For details of the assumption, see Supporting Statement discussion in Section 5(c), and Error: Reference source not found.

Activity	Adjusted Unit Burden (hours)	Number of Respondents (Sponsors) ¹	Number of Responses (Chemicals Tested within an Action)	Overlap Factor	Total Burden (hours)	Total Labor Cost	Total Non-Labor Cost	Total Cost
Exemption Applications Reporting								
Overall Recordkeeping	0.500	3.50	3.50	2.8	4.900	\$169.05	\$0.00	\$169.05
Overall Total, Initial Response including Exemption Applications	4.416	7.0	7.0	2.8	85.563	\$6,323.23	\$0.00	\$6,623.23
Footnotes:								
¹ Assumes one sponsor per chemical.								

TOTAL 3-YEAR BURDEN: 256.689 hours.