## 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:**

Testing Costs (non-labor costs) for 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). Testing costs include laboratory costs and administrative costs. For purposes of this ICR, as in past ICRs, EPA assumes that the tests specified in a standard testing battery of seven tests are all likely to be performed on each chemical, although the specific tests actually performed could differ depending on specific circumstances and testing needs. Estimates include non-labor costs for analytical chemistry method development and validation where it was judged that such method development would be necessary to conform to good laboratory practices. Tests are assigned costs based on typical costs cited by industry experts and compiled by EPA. In addition to laboratory costs, there are also costs for consortium management and costs for technical experts. Consortium management costs, which includes activities such as identifying manufacturers, meetings, organizing payment for testing, developing contracts for testing, and employing toxicologists who may be hired to provide technical expertise, are estimated at 15 percent of total laboratory costs. Costs for technical experts working for the consortium by providing study review and site visits to the laboratory are estimated at 10 percent of total laboratory costs.

**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** |
| Laboratory Costs | 0.000 | 7.00 | 7.00 | 2.80 | 0.0000 | $0.00 | $380,089.67 | $380,089.67 |
| Consortium Management | 0.000 | 7.00 | 7.00 | 2.80 | 0.0000 | $0.00 | $57,013.46 | $57,013.46 |
| Technical Experts | 0.000 | 7.00 | 7.00 | 2.80 | 0.0000 | $0.00 | $38,008.91 | $38,008.91 |
| **Total, Testing Costs (Non-Labor Costs)** | **0.000** | **7.00** | **7.00** | **2.80** | **0.0000** | **$0.00** | **$475,112.04** | **$475,112.04** |
| **Footnotes:**  1 Assumes one sponsor per chemical. | | | | | | | | |

**TOTAL 3-YEAR BURDEN:** 0 hours.