

---

**From:** Edmonds, Marc

**Sent:** Thursday, March 25, 2021 9:06 AM

**Subject:** Public Comment on the Proposed Renewal of an Information Collection Request (ICR) on TSCA fees

My name is Marc Edmonds of the Existing Chemicals Risk Management Division at the Environmental Protection Agency (EPA). I am writing to you today to request your assistance on an Information Collection Request (ICR). For the past few months, EPA has been updating the ICR for the User Fees for the Administration of the Toxic Substances Control Act (TSCA). As part of our consultation process, we are requesting comments from industry on this ICR renewal proposal.

Our records indicate that in the past you may have participated as a representative of your company in responding to the EPA's questions on this ICR. The survey should only take about 15 minutes and your response is voluntary. Should you choose to respond, we ask that you do not submit any sensitive, confidential business information or business phone numbers as part of your response. Here is a link to the Federal Register announcement <https://www.federalregister.gov/documents/2021/03/19/2021-05778/agency-information-collection-activities-proposed-renewal-of-an-existing-collection-and-request-for>. The ICR supporting statement is available in the same docket as the announcement.

EPA solicits your input on the following questions related to the burden and costs associated with the ICR:

- Are the labor rates in the ICR supporting statement accurate?
- The Agency assumes there is no capital cost associated with this activity. Is that correct?
- Are there other costs that should be accounted for that may have been missed?

EPA solicits your input on the following questions related to clarity of instructions associated with this ICR:

- The ICR is intended to require that respondents provide certain data so that the Agency can utilize them.
- Based on the instructions, is it clear what you are required to do and how to submit such data? If not, what suggestions do you have to clarify the instructions?
- Do you understand that you are required to maintain records?
- Are the forms clear, logical, and easy to complete?

EPA solicits your input on the following questions related to electronic reporting and record keeping:

- The Government Paperwork Elimination Act requires agencies make available to the public electronic reporting alternatives to paper-based submissions by 2003.
- What do you think about electronic submissions, such as the Agency's Central Data Exchange (CDX)?
- Are you keeping your records electronically? If yes, in what format?

You may send your responses to the above questions to the EPA Docket **EPA-HQ-OPPT-2020-0616** at <https://www.regulations.gov/docket/EPA-HQ-OPPT-2020-0616> or to me directly, by Thursday, April 8, 2021.

We greatly appreciate your time and participation.

Marc Edmonds  
Team Lead, Risk Management Branch 2  
Existing Chemicals Risk Management Division  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency