

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

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## EXECUTIVE SUMMARY

### Identification of the Information Collection – Title and Numbers

**Title:** Parent Company Definition for TRI Reporting

**EPA ICR No.:** 2597.01

**OMB Control No.:** 2070-NEW

**Docket ID No.:** EPA-HQ-OPPT-2018-0155

### Abstract

This proposed rule Information Collection Request (ICR), which explains the information collection activities and related burden and cost estimates that amends the information collection activities of the Toxics Release Inventory (TRI) reporting and recordkeeping event.

This ICR addresses the paperwork requirements in a proposed rule titled Parent Company Definition for TRI Reporting that is not already included in the currently approved ICR “Chemical Release Reporting,” which covers the current 40 CFR part 372. The Environmental Protection Agency (EPA) is developing a rule under section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) that codifies reporting the highest-level U.S.-based parent company and adds a new data element to Part I, Section 5 for reporting the name of a foreign company in addition to reporting the largest U.S.-based parent company. An economic analysis (EA) provides estimations of the burden and costs associated with the reporting requirements and can be found in the rulemaking docket.

### Summary Total Burden and Costs

	Number of Respondents	Burden per Response (hours)	Total Burden (hours)	Cost per Respondent	Total Costs
Agency	-	-	-	-	-
Respondents	21,458	<ul style="list-style-type: none"><li>First year: 0.84</li><li>Subsequent years: &lt;0.01</li></ul>	<ul style="list-style-type: none"><li>First year: 18,091</li><li>Subsequent years: 210</li></ul>	<ul style="list-style-type: none"><li>First year: \$56.35</li><li>Subsequent years: \$0.65</li></ul>	<ul style="list-style-type: none"><li>First year: up to \$1,209,202</li><li>Subsequent years: up to \$14,020</li></ul>

## Supporting Statement

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Under section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA), and section 6607 of the Pollution Prevention Act (PPA), certain facilities are required to file annual reports to the United States Environmental Protection Agency (EPA), States, and

Indian Country officials on their releases, transfers, and other waste management practices for certain toxic chemicals if they are manufactured, processed, or otherwise used above certain threshold amounts. This information is included in a publicly available database known as the Toxics Release Inventory (TRI).

Congress also granted EPA broad rulemaking authority to allow the Agency to fully implement the statute. EPCRA section 328 states that: "The Administrator may prescribe such regulations as may be necessary to carry out this chapter." 42 U.S.C. 11048.

TRI requires facilities to report their highest-level United States-based parent company information annually in Part 1, Section 5. No text currently exists in 40 CFR part 372 related to this important data field, and current guidance has led to differing interpretations on the definition of parent company between EPA and reporting facilities. Additionally, incorporating this definition into regulatory text as other Agency reporting programs have done will increase the enforceability of consistent and accurate reporting of this data element, which will benefit TRI data quality for many data users.

Each year, EPA standardizes parent company names submitted to TRI. This process involves aligning submissions to a set of business rules (e.g. Corporation is changed to Corp) in addition to researching submitted names to ensure proper reporting by using online sources and other datasets. Each year, EPA has needed to standardize at least 15 percent of the forms received.

In addition to misinterpretation of parent company reporting guidance, there are several company ownership scenarios where current guidance does not explicitly address how to report the parent company, such as facilities that are publicly-owned or have no owner with at least 50 percent of the company's voting stock. In addition, the corporate structure for internationally-headquartered parent companies is often confusing, and facilities may not even know their highest-level U.S.-based parent company. The proposed rule further defines and clarifies reporting requirements for facility parent company information.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The overall goal of TRI is to provide communities with information about toxic chemical releases and other waste management activities and to support informed decision making by industry, government, non-governmental organizations, and the public.<sup>1</sup> TRI's success is due, in large part, to the right-to-know provisions contained in the legislation. By requiring that the resulting data be made publicly available "by electronic and other means," Congress ensured that the general public, the media, environmental advocates, researchers, the business community, and others could evaluate and influence industry's efforts to manage toxic emissions. Consequently, EPA makes available data collected under EPCRA section 313 and

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<sup>1</sup> U.S. EPA Toxics Release Inventory Program. <https://www.epa.gov/toxics-release-inventory-tri-program>

the PPA section 6607 through access tools such as EPA's Envirofacts, the TRI P2 Tool, or TRI Tribal Search.

The TRI Program provides the TRI Preliminary Dataset within weeks after the annual July 1st TRI reporting deadline. The release consists of downloadable files on the TRI website (also accessible through Data.gov), as well as updated online data access tools (Envirofacts and TRI Explorer).

EPA generally makes available the annual TRI National Analysis and the final dataset used for that analysis within eight months after the reporting deadline. In addition to providing information to the public via electronic means, EPA also conducts outreach activities to make key groups and the public aware of TRI. Libraries in communities across the United States (in particular, members of the Federal Depository Library Program) provide public access to TRI data.

Environmental agencies, industry, and the public use TRI data. EPA program offices use TRI data, along with other data, to help establish programmatic priorities, evaluate potential hazards to human health and the natural environment, and undertake appropriate regulatory and/or enforcement activities. Environmental and public interest groups use the data to better understand toxic chemical releases at the community level and to work with industry, government agencies, and others to promote reductions in toxic chemical releases. Industrial facilities use the TRI data to evaluate the efficiency of their production processes and to help track and communicate their progress in achieving pollution prevention goals. States use the TRI data to compare toxic chemical releases and other waste management approaches within specific industries and to set environmental priorities at the state level. See EPA's *The Toxics Release Inventory in Action: Media, Government, Business, Community and Academic Uses of TRI Data* for more detailed descriptions of how these organizations use TRI data.<sup>2</sup> EPA encourages TRI data users to provide feedback on ways to improve TRI products and services.

EPA believes that TRI data on the facility's foreign parent company are of interest to the public because of the potential social benefits resulting from the availability of these data. Making TRI information available to the public may provide incentives for facilities to reduce TRI chemical releases. For example, the public availability of release information aggregated at the parent company level may induce parent companies to encourage facilities to reduce releases when such changes would not be in the parent company's interest if release information were not in the public domain. Potential social benefits derived from voluntary follow-on activities include decreased costs of waste treatment and disposal, lower probability of accidental releases and lower clean-up costs in the event of such releases, reduced contamination of natural resources, improved air and water quality, and reduced risks to human health. Such social benefits are partially offset by the social costs to implement the changes, such as using flare gas recovery recycling and installing vapor recovery systems. The net social benefits of the information provided by the proposed rule and the possible follow-on activities equal the

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<sup>2</sup> [https://www.epa.gov/sites/production/files/documents/tri\\_in\\_action\\_final\\_report\\_july\\_2013.pdf](https://www.epa.gov/sites/production/files/documents/tri_in_action_final_report_july_2013.pdf)

difference between the total benefits and the total costs of the activities leading to reduced releases.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

EPA requires the electronic submission of TRI reporting forms through the Internet via EPA's Central Data Exchange (CDX) by using the Toxics Release Inventory Made Easy Web (TRI-MEweb) reporting software (see 40 CFR 372.85(c)). TRI-MEweb helps facilities prepare high-quality reports more easily than they could by using paper reporting forms due to a number of technology advances, including built-in data quality checks. The proposed rule does not change electronic submission requirements.

Additionally, EPA has made reporting via TRI-MEweb more automated for facilities. Once facility-level information (including parent company data) is submitted in TRI-MEweb, the data remain in TRI-MEweb and are automatically populated for each chemical reporting form. For the parent company data element, EPA has incorporated a drop-down list of known TRI parent company names in the standardized format to assist facilities in identifying their parent company and the standardized format for reporting purposes.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

Several existing data sources contain parent company information. The Chemical Data Reporting program finalized a rule in 2020 which included a codified definition of "parent company" nearly identical to the definition. While there is some overlap between the facilities who report under the Chemical Data Reporting rule and to TRI, EPA estimates over half of TRI facilities do not currently report to CDR.

Additionally, the Greenhouse Gas Reporting Rule requires facilities to report the legal name of the highest-level United States parent company of the facility or supplier and the percentage ownership interest for each listed parent company; however differences exist in information collected and facility coverage.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

Under EPCRA section 313 (b)(1)(A), facilities with fewer than 10 full-time employees (or the equivalent) do not have to report. In addition, EPA has taken several steps to minimize the burden for covered small businesses. EPA added a range reporting option to the Final Rule (53 FR 4500, February 16, 1988) codifying the EPCRA section 313 reporting requirements.

Range reporting was the preferred option from the Regulatory Flexibility Act analysis to provide burden reduction for small businesses. Range reporting provides an option for releases of less than 1,000 pounds to be recorded as a code representing one of three ranges (1 to 10 pounds, 11 to 499 pounds, or 500 to 999 pounds) rather than as a specific estimate of the release amount. The benefit is not, however, limited to small businesses. Note that facilities may not use range reporting on Forms R for Persistent Bioaccumulative Toxic (PBT) chemicals.

In response to a petition from the Small Business Administration, EPA promulgated the alternate threshold (59 FR 61488, November 30, 1994), manifested in Form A reporting, as discussed in Section 1(d). Although any reporting facility meeting the criteria may use the alternate threshold, this alternate threshold may be particularly advantageous to small entities.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Since TRI represents the best available multi-media database for tracking toxic chemical releases in the United States, a change in the reporting frequency to less than once a year could have a significant impact on the availability of timely toxic chemical data, including parent company information, and affect data users, particularly at the community level. Additionally, public access to the most current toxic chemical release data and other waste management information would become more difficult.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

Not applicable.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The proposed rulemaking serves as the public notice for this ICR amendment. Interested parties should submit comments referencing Docket ID No. EPA-HQ-OPPT-2018-0155 to the address listed at the end of this document. Responses will be taken into account in developing the final rulemaking.

**1. 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

This collection does not provide any payment or gift to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

Although reporting facilities must identify the chemical for which they submit reports, in situations where respondents must submit trade secret information, they can claim the chemical identity as a trade secret. In such circumstances, facilities provide a generic name as part of the information made available to the public. EPA securely stores and maintains the true identity of the chemical (see also Section 3(f) below). However, all other data submitted to EPA on the TRI reporting forms, including parent company identity, cannot be claimed as trade secret and are made public.

While EPCRA section 313 is generally published under community right-to-know principles, respondents may designate the specific chemical identity of a substance as a trade secret according to EPCRA section 322. Procedures for submission and review of trade secret claims under EPCRA section 313 are set forth in 40 CFR 350. When a facility claims the chemical identity to be a trade secret and properly substantiates the claim, EPA will not disclose the identity of the chemical to the public. EPA securely stores forms with trade

secret information and allows access to those documents only to persons with Trade Secret clearance. Data made available to the public through any means do not include trade secret information. Parent company names cannot be considered trade secret under EPCRA section 313.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

This collection does not request any sensitive information.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government'.**

The *Economic Analysis of the Proposed Parent Company Definition for TRI Reporting* (U.S. EPA, 2021) provides the detailed methodology for estimating the number of respondents. This proposed rule would not alter the universe of TRI-reporting facilities. Thus, the respondents under this proposed rule are those which are currently required to report under EPCRA section 313. Reporting year (RY) 2019 data are used to characterize the potentially affected facilities and forms. As such, an estimated 21,458 facilities and 78,661 forms are potentially affected by the proposed rule. Respondents under this proposed rule would report to EPA annually.

For the proposed rule, the incremental burden and cost potentially incurred by industry are estimated using comparisons to the Ratio-Based Burden Methodology (RBBM), which is a simplified formulation of a previously employed burden methodology (U.S. Environmental Protection Agency, 2011).

Reporting activities can be divided into two distinct groups: Form Activities, consisting of rule familiarization, reporter compliance determination, form completion, and recordkeeping and submission; and Non-Form Activities, consisting of non-reporter compliance determination. Specifically, the following activities may be undertaken under the proposed rule:

### **Form Activities**

Rule Familiarization: Staff at a facility must read the reporting package and become familiar with the revised language and reporting requirements. This activity includes the time needed to review instructions as well as the time needed to train personnel to respond to an information collection request. As part of doing so, facility staff will be able to ascertain whether the facility is reporting parent company information accurately per the codified definition.

Reporter Compliance Determination: Staff at reporting facilities must determine whether the facility is reporting parent company information accurately per the codified definition. Under the proposed rule, there is no incremental burden expected for Compliance Determination since facilities already know how they are currently reporting parent company information and whether that complies with the parent company information identified during Rule Familiarization.

Form Completion: Staff at reporting facilities must gather data to provide the information required on Reporting Form R or Reporting Form A. This activity includes the time required to search data sources for parent company information and complete and review the information.

Recordkeeping and Submission: Staff at reporting facilities must maintain recordkeeping systems and submit the report to EPA and the state in which the facility is located. This activity includes the time required to transmit or otherwise disclose the information.

### **Non-Form Activities**

Non-Reporter Compliance Determination: In any given reporting year, a group of eligible facilities will complete compliance determination but will not file a Form R or a Form A. The activity is the same as is presented above under Form Activities. Given that the proposed rule will not change any reporting requirements that might change the universe of eligible facilities, no non-reporter compliance determination is expected.

In this proposed rule, all TRI reporters are expected to incur rule familiarization costs associated with reading the new requirements as well as reporter compliance determination.

EPA is presenting three regulatory options in this proposed rule to codify the definition of parent company:

- Option 1: codifies the definition of parent company; facilities must report appropriate highest-level U.S.-based parent



- Option 2: codifies the definition of parent company, and also directs facilities to report a foreign parent instead of the highest-level U.S. parent when appropriate (i.e., no new data elements added)
- Option 3: codifies the definition of parent company, and add two new data elements to the TRI reporting forms to report the highest-level foreign parent and its Dun & Bradstreet number (i.e., facilities would report both the highest-level U.S.-based parent and the highest-level foreign parent, when applicable).

Because only Option 3 would add new data elements to the TRI reporting forms, thus necessitating this ICR supporting statement, only the burden and cost of choosing Option 3 will be analyzed here.

Under Option 3, management and technical time are required in the first year for rule familiarization. The rule familiarization burden and assumptions include five minutes management time and 25 minutes technical time for the first year. This assumption includes the burden needed to read the rule, plus an additional five minutes of technical time to read instructions related to the new U.S.-based parent company and additional foreign parent company data elements in Part I, Section 5.

Facility staff are assumed to fully comprehend the rule and associated requirements by the subsequent year (0 minutes in steady state). Because the parent company is repeated for all forms a facility submits in TRI-MEweb, the burden estimates are accrued at the facility level.

EPA also estimated burden for form completion activities. Options 1 and 2 codify element definitions only and do not affect the number of form elements or their data type, and as such, no incremental burden is incurred for these regulatory options. Option 3 adds two data elements to Part I, Section 5 for the foreign parent entity. Incremental reporting burden is calculated by addition of the same reporting burden in the RBBM as Part I, Sections 5.1 and 5.2. The first-year burden is calculated using the RBBM as 0.16 minutes of management time per form and 20 minutes technical time per firm. Steady state burden only requires management time for reviewing purposes (0.16 minutes per form) since the information will already be recorded in TRI-MEweb.

The incremental costs potentially incurred by industry are estimated using the weighted average wage rate (WAWR), representing the average loaded cost for a mix of Managerial, Technical, and Clerical labor per hour of TRI reporter burden. The WAWR is calculated using data from Bureau of Labor Statistics' Employer Costs for Employee Compensation (2021), updated quarterly, and is equal to \$66.84 (in 2020 dollars).

Tables 1 and 2 present the total incremental industry burden and cost, respectively, of the proposed rule in the first year of the rule and in the steady state, for Option 3.

**Table 1 First Year and Steady State Incremental Industry Burden**

	<b>Activity</b>	<b>Option 3 (hours)</b>
<b>First Year</b>	Rule Familiarization	10,729
	Form Completion	7,362
	<b>Total</b>	<b>18,091</b>
<b>Steady State</b>	Rule Familiarization	0
	Form Completion	210
	<b>Total</b>	<b>210</b>

**Table 2 First Year and Steady State Incremental Industry Cost**

	<b>Activity</b>	<b>Option 3</b>
<b>First Year</b>	Rule Familiarization	\$717,126
	Form Completion	\$492,076
	<b>Total</b>	<b>\$1,209,202</b>
<b>Steady State</b>	Rule Familiarization	\$0
	Form Completion	\$14,020
	<b>Total</b>	<b>\$14,020</b>

Table 3 shows Option 3's estimated unit burden by activity (rule familiarization, form completion), reporting period, and labor category.

**Table 3 Estimated Unit Burden by Activity, Period, Regulatory Option, and Labor Category**

Activity	Labor Category	Option 3: U.S. and Foreign Parent Company Data Elements	
		First Year Burden (min)	Steady State Burden (min)
Rule Familiarization (Per Facility)	Management	5	0
	Technical	25	0
	Clerical	0	0
Report Completion (Per Facility)	Management	0	0
	Technical	20	0
	Clerical	0	0
Report Completion (Per Form)	Management	0.16	0.16
	Technical	0	0
	Clerical	0	0
Total	Management (Per Facility)	5	0
	Technical (Per Facility)	45	0
	Clerical (Per Facility)	0	0
	Management (Per Form)	0.16	0.16

**13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).**

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and**

software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There are no specific capital and operation and maintenance costs associated directly with this information collection activity.

**14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

For the TRI program in general, EPA incurs burden and costs to process TRI forms in five categories of activities: data processing, outreach and training, information dissemination, policy and petitions, and compliance and enforcement. The estimate of EPA burden and costs is separated into a fixed component and a variable component. Activities and expenses that are not greatly affected by marginal changes in reporting quantities are considered fixed costs. These activities and expenses include rent for the EPCRA Reporting Center, development costs for data access tools, compliance assistance measures, and other activities and expenses listed above. There are no additional fixed costs to the Agency associated with the proposed rule. Activities and expenses that vary with marginal changes in the number of reports submitted are considered variable costs. The primary variable cost analyzed in this analysis is the cost of processing forms. Because the proposed rule does not change the number of forms submitted, there is no additional variable costs to the Agency associated with the proposed rule.

**15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.**

The incremental reporting burden per form for the addition of two data elements to Part I, Section 5 for the foreign parent entity is calculated by addition of the same reporting burden in the RBBM as Part I, Section 5.1. Steady state burden only requires management time for

reviewing purposes since the information will already be recorded in TRI-MEweb. The resulting reporting burden will increase by 0.16 minutes per reporting form.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Not applicable.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

Not applicable.

**18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”**

EPA does not request an exception to the certification of this information collection.

## **Supplemental Information**

The annual public burden for this collection of information is estimated to average approximately 0.28 hours annually per respondent over the three-year 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 the time needed to review and understand instructions; prepare and submit reports (including searching data sources); complete and review the collection of information; transmit the information; and keep records.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OPPT-2018-0155, which is available at <http://www.regulations.gov>. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the Docket ID Number identified above.

You can also provide comments to the Office of Information and Regulatory Affairs, Office of Management and Budget via <http://www.reginfo.gov/public/do/PRAMain>. Find this particular information collection by selecting “Currently under 30-day Review—Open for Public Comments” or by using the search function.

All comments received by EPA will be included in the docket without change, including any personal information provided, unless the comment includes profanity, threats, information claimed to be Confidential Business Information (CBI), or other information whose disclosure is restricted by statute. Do not submit electronically any information you consider to be CBI or other information whose disclosure is restricted by statute.

Due to public health concerns related to COVID-19, the EPA Docket Center and Reading Room are open to the public *by appointment only*. [Read more about the operating status.](#)

## List of Attachments

The attachments listed below can be found in the docket for this ICR or by using the hyperlink that is provided in the list below. The docket for this ICR is accessible electronically through <http://www.regulations.gov> using Docket ID Number: EPA-HQ-OPPT\_2018-0155.

Ref	Title
1.	<a href="#">Emergency Planning and Community Right-to-Know Act (EPCRA) section 313 and section 6607 of the Pollution Prevention Act</a>
2.	Proposed Rule
3.	<b>Toxics Release Inventory Sample 2020 Form R</b> <a href="https://ordspub.epa.gov/ords/guideme_ext/guideme_ext/guideme/file/ry_2020_form_r.pdf">https://ordspub.epa.gov/ords/guideme_ext/guideme_ext/guideme/file/ry_2020_form_r.pdf</a>
4.	<b>Toxics Release Inventory Sample 2020 Form R Schedule 1</b> <a href="https://ordspub.epa.gov/ords/guideme_ext/guideme_ext/guideme/file/ry_2020_form_r_schedule_1.pdf">https://ordspub.epa.gov/ords/guideme_ext/guideme_ext/guideme/file/ry_2020_form_r_schedule_1.pdf</a>
5.	<b>Toxics Release Inventory Sample 2020 Form A</b> <a href="https://ordspub.epa.gov/ords/guideme_ext/guideme_ext/guideme/file/ry_2020_form_a.pdf">https://ordspub.epa.gov/ords/guideme_ext/guideme_ext/guideme/file/ry_2020_form_a.pdf</a>

## References

Abt Associates Inc. (2004). Abt Associates Engineering Study (TRI Reporting Burden Estimates).

Heiden Associates. (1989). Final Report: A Study of Industry Compliance Costs Under the Final Comprehensive Assessment Information Rule, Prepared for the Chemical Manufacturers Association.

U.S. Bureau of Labor Statistics. (2021). Employer Costs for Employee Compensation - December 2020. Retrieved from: [https://www.bls.gov/news.release/archives/ecec\\_03202018.pdf](https://www.bls.gov/news.release/archives/ecec_03202018.pdf).

U.S. Environmental Protection Agency. (2011). *Revising TRI Burden to Ratio-Based Methodology*. Retrieved from: <http://www2.epa.gov/sites/production/files/documents/136321RatioBasedMethodology.pdf>.

U.S. Environmental Protection Agency. (2012). Economic Analysis of the Toxics Release Inventory (TRI) Reporting for Facilities Located in Indian Country Final Rule.

U.S. Environmental Protection Agency. (2021). Economic Analysis of the Proposed Parent Company Definition for TRI Reporting. Available at [www.regulations.gov](http://www.regulations.gov), Docket ID # EPA-HQ-OPPT-2018-0155.