



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

---

Meredith Williams, Ph.D., Director  
1001 "I" Street  
P.O. Box 806  
Sacramento, California 95812-0806



**Gavin Newsom**  
Governor

October 18, 2021

Michal Freedhoff, Ph.D.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
1201 Constitution Avenue NW  
Washington, DC 20004

Dear Dr. Freedhoff:

On behalf of the California Department of Toxic Substances Control's (DTSC) Safer Consumer Products (SCP) Program, I appreciate the opportunity to comment on docket [EPA-HQ-OPPT-2017-0652](#) regarding the proposed renewal of the EPA's Information Collection Request related to expanded access to Toxic Substances Control Act (TSCA) Confidential Business Information (CBI).

DTSC believes that expanded access to TSCA CBI has the potential to be very valuable to the Safer Consumer Products Program, California as a whole, and programs in other state addressing toxic chemicals in products. Access to TSCA CBI, in specific instances, may greatly assist the SCP Program in identifying consumer products that contain potentially harmful chemicals and promoting the development, sale, and use of safer alternatives to those chemicals.

DTSC also believes that EPA's estimated total annual burden (89 hours) and estimated total annual costs (\$5,873.98) to prepare the required agreements and statements to satisfy the conditions for access to TSCA CBI are reasonable. These costs are minimal and trivial relative to the expected benefits to the SCP Program of access to TSCA CBI in certain cases.

Dr. Michal Freedhoff  
October 18, 2021  
Page 2

Thank you for considering the potential impacts on state, tribal, and local governments; environmental, health, and medical professionals; and emergency responders of the anticipated effort required to gain expanded access to TSCA CBI.

Sincerely,

A handwritten signature in blue ink that reads "Karl Palmer". The signature is written in a cursive, flowing style.

Karl Palmer  
Deputy Director  
Safer Consumer Products Program  
Department of Toxic Substances Control  
California Environmental Protection Agency

cc: Jessica Barkas, PMOD, EPA OPPT  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
1201 Constitution Avenue NW  
Washington, DC 20004

Andre Algazi  
Branch Chief  
Department of Toxic Substances Control  
Safer Consumer Products Program  
1001 I Street, P.O. Box 806  
Sacramento, California 95814-0806

Topher Buck  
Senior Environmental Scientist Specialist  
Department of Toxic Substances Control  
Safer Consumer Products Program  
1001 I Street, P.O. Box 806  
Sacramento, California 95814-0806