



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D., Director
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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
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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
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