

October 11, 2021

Niva Kramek
Team Lead, RMB1
Existing Chemicals Risk Management Division
Office of Chemical Safety and Pollution Prevention
US Environmental Protection Agency

RE: Response to request for feedback on methylene chloride information collection

Dear Niva Kramek,

As per your request, please find our comments to your questions below.

1. INFORMATION COLLECTION

- (a) Please evaluate whether the proposed collection of information (downstream notification and recordkeeping) is necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility.

[Nu-Calgon's Response] We do not manufacture (including import), process or distribute in commerce methylene chloride for consumer paint or coating removal. We have methylene chloride containing condenser coil cleaner and methylene chloride containing aerosol insulation product, which has since been reformulated ready to launch. We have a gas leak detector that contains methylene chloride as a by-product. We included this product due to no guidance on what the minimum quantity of methylene chloride is in a product. These products are for HVAC-R professional use only. As such, our obligation falls under §751.107 Downstream notification. As mandated in §751.107 (a) and (b), we added the required text in the correct sections of the SDS for these products. A copy of the product's SDS was provided by email to our customer upon receipt of their order. This downstream notification started on August 26, 2019, and it is still ongoing at this time. As our products are not consumer paint or coating removal, it is not clear to us whether this SDS notification was practical or not from our customer's perspective. We do not have any feedback from our customers on the practicality of this notification either.

- (b) Please describe any considerations that could enhance the quality, utility, and clarity of the information to be collected.

[Nu-Calgon's Response] When we provide a copy of the SDS to our customers upon receipt of their order, we point out the Sections 1.(c) and 15 of the SDS to draw their attention to clarify our reason for the email correspondence. This way of communication seems to work for us and our customers.

2. BURDEN COST ANALYSIS

(a) Please evaluate the accuracy of the Agency's estimates of the burden of the proposed collection of information, including the validity of the methodology and assumptions used.

[Nu-Calgon's Response] Starting from planning to execution of downstream notification that started on August 26, 2019, a number of key personnel were involved to ensure that:

- Nu-Calgon was following the regulation as written.
- The correctly identified individual in each organization/customer would receive the information.
- A record of each correspondence would be logged and maintained.

In addition, in the early stage of executing this notification to each customer on a daily basis, one or two employee(s) spent their time away from their daily duty to provide a daily summary of orders that contain methylene chloride. Then another employee carved out her time away from her daily duties for downstream notification. This was burdensome in the beginning due to the volume of notification needed each day. Since then, the daily log of orders has been auto populated by an IT person. But a review of whether a customer has been notified or not continues in order to meet §751.109 Recordkeeping. The notification is done by email due to easiness of delivery and read receipt.

(b) Are the Bureau of Labor Statistics (BLS) labor rates accurate? If you have any reason to consider the BLS labor rates inaccurate or inappropriate as used by EPA, please explain your rationale.

[Nu-Calgon's Response] The BLS labor rates seems close.

3. ADDITIONAL INFORMATION

(a) EPA specifically solicits comments and information to enable it to Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses. In particular, EPA is requesting comments from very small businesses (those that employ fewer than 25 individuals) on examples of specific additional efforts that EPA could make to reduce the paperwork burden for very small businesses affected by this collection.

[Nu-Calgon's Response] Not applicable. There are more than 25 employees at Nu-Calgon.

Should you have any question or need clarification, please do not hesitate to contact me.

Regards,

Jessica Jones

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