From:
To:
Subject:
Date:

Dear Joshua Booth-san,

My answers are,

1. INFORMATION COLLECTION

(a) No, TSCA is only reporting that we have done.

(b) Yes, it is clear what is required for submission.

2. ELECTRONIC REPORTING AND RECORDKEEPING

(a)1a. The application was easy to use and provided adequate information which allowed the user to complete the report with minimal assistance from technical support or use of the user manual.

(a)1b. The website was clear, had easy-to-understand language, and linked to important pages and resources which made navigation easy.

(a)1c. Use as a manufacturer and importer was very easy. Entering information and data were simple.

(a)1d. The substantiation process was slightly more difficult; however, the information and resources provided to assist with the completion of this process were sufficient.

(a)1e. Uploading information to the site was easy.

(a)1f. No additional comments.

(a)2. Submitting data through CDX did not present any difficulties.

(b) No difficulties I have encountered.

3. BURDEN COST ANALYSIS

(a) Yes, the adoption of the CDR database reduces the reporting burden by minimizing both the cost and the time required to review, edit and transmit data to the Agency.

(b) The Labor Statistics (BLS) labor rates are accurate.

President, ARAKAWA CHEMICAL (USA) Inc.

差出人: Booth, Joshua <Booth.Joshua@epa.gov>

送信日時: Wednesday, September 29, 2021 11:38 AM

ＣＣ: Turk, David <Turk.David@epa.gov>; Sharkey, Susan <Sharkey.Susan@epa.gov>; Comnes, Meredith <comnes.meredith@epa.gov>

件名: EPA Request for Information Collection Request (ICR) Consultation

Good Afternoon,

My name is Joshua Booth of the Data Collection Branch at the Environmental Protection Agency (EPA). I am writing to you today to request your assistance on an Information Collection Request (ICR) for the Toxic Substances Control Act (TSCA) Chemical Data Reporting (CDR). As part of our consultation process for this ICR renewal proposal, we are requesting comments from people who are experienced at preparing and submitting CDR data. See below for specific questions on which EPA is seeking comments.

Please note that, if you take this opportunity to provide input, your name, affiliation, phone number, and any information you provide (e.g., copies of emails) will be incorporated and attached to the ICR supporting statement, which will be a public document. In addition, you may be contacted by the Office of Management and Budget (OMB) desk examiner reviewing this ICR renewal to verify the accuracy of any comments as reported in the ICR by EPA.

Your timely response to the questions would be greatly appreciated. **Please email your comments no later than 2 weeks after receipt of this letter.** If you need more time, you may alternatively submit comments to the docket (https://www.regulations.gov/docket/EPA-HQ-OPPT-2013-0721) **by November 22, 2021**. We will consider your responses, along with other consultation responses and public comments resulting from the Federal Register notice, as we prepare a final document for OMB review. Thank you for your assistance.

Background on the Paperwork Reduction Act (PRA): The PRA requires that agencies receive Office of Management and Budget (OMB) clearance before requesting most types of information from the public. In order to receive OMB clearance, federal agencies prepare draft ICRs providing an overview of the information collection and estimates of the cost and time for the public to respond. The agencies consult with potential respondents and the public about the ICR and, where appropriate, incorporate comments received. The draft ICR is then sent to OMB for its review and approval. Pursuant to the PRA, EPA must periodically renew ICRs.

Accordingly, EPA is contacting you to solicit your comments on the renewal of the ICR entitled "Chemical Data Reporting under the Toxic Substances Control Act (TSCA)," identified by EPA ICR No. 1884.13 and OMB Control No. 2070-0162. This request is being made alongside the ongoing comment period being provided to the public on this ICR renewal. The CDR ICR renewal addresses the TSCA Section 8(a) reporting and recordkeeping requirements associated with the CDR rule, which is administered by the EPA under the Toxic Substances Control Act (TSCA) (40 CFR part 711).

Federal Register Notice for this ICR Renewal: The Federal Register Notice for this ICR renewal (86 FR 52457) was published on September 21, 2021 and is accessible via this link: https://www.regulations.gov/document/EPA-HQ-OPPT-2013-0721-0010. The supporting statement which provides information on the burden associated with the ICR renewal is available here: https://www.regulations.gov/document/EPA-HQ-OPPT-2013-0721-0013.

Background on CDR: Under the CDR, companies that manufacture (including import) chemicals that are on the TSCA Chemical Substances Inventory (TSCA Inventory) may be required to report manufacturing, processing, and use information

about the chemicals to EPA. EPA uses the data gathered from CDR to support many human health and environmental protection activities related to chemical manufacturing. The CDR information helps EPA, other agencies, and the general public to readily screen and prioritize chemicals for the purpose of identifying potential human health and environmental effects.

QUESTIONS:

1. INFORMATION COLLECTION

(a) Is the information that the Agency seeks under this ICR available from any public source, or already collected by another office at EPA or by another agency? If yes, where can the Agency find the data?

(b) Is it clear what is required for data submission? If not, do you have suggestions for clarifying instructions?

2. ELECTRONIC REPORTING AND RECORDKEEPING

(a) For the 2020 CDR collection, EPA modernized the electronic reporting tool, eCDRweb. How would you rate your overall experience using the electronic tool? Specifically, how would you describe your experience with the following?

1. The ease of using eCDRweb:
    a. Intuitiveness of the application
    b. Ease in navigation
    c. Ease of use as a Manufacturer, Importer, and/or joint submitter
    d. Substantiation process
    e. Bulk upload
    f. Additional comments/thoughts
2. Submitting data through the Central Data Exchange (CDX)

(b) If you encountered difficulties, do you have suggestions for improvement?

3. BURDEN COST ANALYSIS

(a) Do you agree with EPA's estimated burden and costs related to submitting CDR information to the CDR database? If not, please explain.

(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.

Thank you,

Joshua Booth
U.S. Environmental Protection Agency
Environmental Protection Specialist
Office of Pollution Prevention and Toxics
Data Collection Branch
Booth.Joshua@epa.gov
Phone: (202) 565-0065