



October 18, 2021

**Via Electronic Mail and E-Docket**

Joshua Booth  
U.S. Environmental Protection Agency  
Environmental Protection Specialist  
Office of Pollution Prevention and Toxics  
Data Collection Branch  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

**Re: Docket No. EPA-HQ-OPPT-2013-0721  
Notice: Agency Information Collection Activities; Proposed Renewal of an  
Existing Collection and Request for Comment; Chemical Data Reporting  
Under the Toxic Substances Control Act (TSCA)  
86 FR 52457, September 21, 2021**

Dear Mr. Booth:

Giant Cement Holding, Inc. (GCHI) owns and operates several companies in the United States that are subject to the Chemical Data Reporting (CDR) under the Toxic Substances Control Act (TSCA) codified at 40 CFR §711. On September 29, 2021, GCHI received an email from U.S. Environmental Protection Agency (EPA) requesting that GCHI provide comments and provide responses to three (3) provided questions. Accordingly, please attached the comments of GCHI on the above referenced Notice and Request for Comment (Docket ID No. Docket No. EPA-HQ-OPPT-2013-0721, 86 FR 52457, September 21, 2021).

Sincerely,

Stephen P. Holt, P.E.

Vice President, Environmental, Health, and Safety

Attachment

**COMMENTS FROM GIANT CEMENT HOLDING, INC.**  
**ON NOTICE AND REQUEST FOR COMMENT**  
**(DOCKET ID NO. DOCKET NO. EPA-HQ-OPPT-2013-0721,**  
**86 FR 52457, SEPTEMBER 21, 2021)**

Questions from U.S. EPA are provided in bold and GCHI's responses are provided in italics.

**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?**

*GCHI Comment: GCHI is not aware of other agencies or departments where this information is located.*

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

*GCHI Comment: In general, the information needs for this submission are clear and understandable.*

**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?**

- a. The ease of using eCDRweb:**
- i. Intuitiveness of the application**
  - ii. Ease in navigation**
  - iii. Ease of use as a Manufacturer, Importer, and/or joint submitter –**
  - iv. Substantiation process**
  - v. Bulk upload**
  - vi. Additional comments/thoughts**
- b. Submitting data through the Central Data Exchange (CDX) –**

*GCHI Comment: GCHI provides the following ratings for our overall experience using eCDRweb:*

- i. Intuitiveness of the application: Satisfactory.*
- ii. Ease in navigation: Satisfactory; it is relatively easy to navigate.*
- iii. Ease of use as a Manufacturer, Importer, and/or joint submitter: Satisfactory; for comparison purposes, eCDRweb takes less time per chemical for GCHI to input data compared to TRIMEweb.*
- iv. Substantiation process: N/A.*

- v. *Bulk upload: N/A.*
- vi. *Additional comments/thoughts: None.*

*In regards to submitting data through the CDX, GCHI comments that having one clearing house for most EPA reporting programs is efficient and provides relative ease of use. For example, once a Responsible Official is designated, registering for other programs and maintaining that designation demonstrates high efficiency.*

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

*GCHI Comment: Certain information requests result in estimates because the required numbers are unavailable. For example, the number of facilities to which we provide our products is known, but the number of employees/personnel at those sites is not. GCHI makes an estimate as to the number of people potentially exposed at each facility and multiplies that value by the number of facilities. Improved guidance regarding estimations may be appropriate.*

**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.**

*GCHI Comment: GCHI is not able to accurately define the burden and costs related to submitting the CDR, but the burden and costs provided appear to be conservative based on our experience for the 2020 reporting period.*

**(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.**

*GCHI Comment: GCHI has no comment on the reliance of the BLS rates by EPA.*