

**Consultation Questions for the Information Collection Request (ICR) for Notification of
Chemical Exports TSCA Section 12b**

(1) Publicly Available Data

- A. Is the data that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency?
- B. If yes, where can you find the data?
(Does your answer indicate a true duplication, or does the input indicate that certain data elements are available, but that they do not meet our data needs very well?)

(2) Clarity of Instructions

The ICR covers the requirement under the PBT rule for respondents to maintain records.

- A. Based on the instructions (regulations, FR Notices, etc.), is it clear what you are required to do? If not, what suggestions do you have to clarify the instructions?
- B. Do you understand that you are required to maintain records?

(3) Electronic Reporting and Record keeping

The Government Paperwork Elimination Act requires agencies make available to the public electronic reporting alternatives to paper-based submissions by 2003, unless there is a strong reason for not doing so. One such reason is that, at the present time, the Agency is unable to ensure the security of CBI that might be transmitted over the Internet.

- A. What do you think about electronic alternatives to paper-based records and data submissions? Would you be interested in pursuing keeping records electronically?

B. Are you keeping your records electronically? If yes, in what format?

(4) Burden and Costs

A. Are the labor rates accurate?

B. The Agency assumes there is no capital cost associated with this activity. Is that correct?

C. Bearing in mind that the burden and cost estimates include only burden hours and costs associated with the paperwork involved with this ICR (*e.g.*, the ICR does not include estimated burden hours and costs for conducting studies) are the estimated burden hours and labor rates accurate? If you provide burden and cost estimates that are substantially different from EPA's, please provide an explanation of how you arrived at your estimates.

D. Are there other costs that should be accounted for that may have been missed?