

**From:** [Lintner, Colby](#)  
**To:** [Sleasman, Katherine](#)  
**Cc:** [Wallace, Ryan](#)  
**Subject:** FW: ICR Renewal Questions for Contractor Access to CBI  
**Date:** Thursday, June 26, 2025 5:49:58 PM  
**Attachments:** [CBI Access ICR Consultation Questionnaire .doc](#)  
[image001.png](#)

---

To: Contractor DCOs

Re: ICR renewal questions (attached) for contractor access to CBI

I am contacting you to solicit your input on the renewal of the Information Collection Request (ICR) (see attached questions). This ICR under the Toxic Substance Control Act titled “**Request for Contractor Access to TSCA Confidential Business Information (CBI)**” identified by OMB Control No. 2070-0075. OMB requires federal agencies to consult with nine or fewer potential respondents prior to submitting the ICR renewal to OMB for review and approval. This consultation requirement is in addition to providing the public with 60 days to comment on the proposed collection activity. The notice announcing the ICR renewal and solicitation of comments was published in the **Federal Register** on June 25, 2025, ([90 FR 27016](#)) See <http://www.regulations.gov/>, docket ID EPA-HQ-OPPT-2017-0318, and the ICR supporting statement for this renewal located in that docket for additional information.

The Paperwork Reduction Act (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. These ICRs are periodically renewed.

The EPA procures contract support to facilitate the performance of certain duties. EPA may require contractors to handle TSCA Confidential Business Information (CBI). Each contractor employee who will use TSCA CBI in the performance of his or her duties must be authorized for access to TSCA CBI through a multi-step process. The TSCA CBI Protection Manual (EPA Publication 7700 A2) provides Federal and contractor employees with guidelines and operating procedures for handling TSCA CBI while performing their official duties, as well as the procedures to obtain authorization for access to TSCA CBI. Specifically, for purposes of this information collection, contractor personnel must submit to EPA the EPA form titled “TSCA CBI Access Request, Agreement, and Approval” (EPA Form 7740-6). The Office of Pollution Prevention and Toxics (OPPT), uses EPA Form 7740-6 to collect information about contractor personnel so that the Agency can evaluate their suitability for access to TSCA CBI. EPA stores the information on the OPPT Chemical Information System (CIS).

Please provide responses back by EPA by July 11, 2025.

Thank you,

*Colby Lintner*  
*Lead Environmental Protection Specialist*  
*USEPA, Office of Pollution Prevention and Toxics*  
*Project Management and Operations Division*  
*(202) 564-8182, [lintner.colby@epa.gov](mailto:lintner.colby@epa.gov)*



## Consultation Questions for ICR Renewals

### Publicly Available Data

1. Is the data that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency?
2. 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 don't meet our data needs very well?)

### Frequency of Collection

1. Can the Agency collect the information less frequently and still produce the same outcome?

### Clarity of Instructions

1. The ICR is intended to require that respondents provide certain data so that the Agency can utilize them.
2. Based on the instructions (regulations, guidance documents, etc.), is it clear what you are required to do and how to submit such data? If not, what suggestions do you have to clarify the instructions?
3. Do you understand that you are required to maintain records?
4. Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical and easy to complete?
5. Are there forms associated with this process? Do you use them? Are they clear, logical, and easy to complete?
6. In what format are you keeping your electronic records?

### Burden and Costs

1. Are the labor rates accurate?
2. The Agency assumes there is no capital cost associated with this activity. Is that correct? 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.
3. Are there other costs that should be accounted for that may have been missed?