

From: [Hammack, Carolyn](#)
Cc: [Nelson, Megan M](#); [Debell, Kevin](#); [Sleasman, Katherine](#)
Subject: ICR Consultation for Notification of Substantial Risk of Injury to Health and the Environment under TSCA Section 8(e) (2070-0046)
Date: Thursday, July 10, 2025 8:34:59 AM
Attachments: [Consultation Questions 2070-0046.docx](#)

Hello,

I am contacting you to solicit your input on an Information Collection Request (ICR) (see attached questions). This ICR renewal is titled "Notification of Substantial Risk of Injury to Health and the Environment under TSCA Section 8(e)" identified by OMB Control No. 2070-0046. 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 July 2, 2025, ([90 FR 29005](#)) See <http://www.regulations.gov/>, docket ID EPA-HQ-OPPT-2015-0744, and the ICR supporting statement for this renewal is 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 renewal ICR is then sent to OMB for its review and approval. This ICR covers the information collection activities associated with the submission of information to EPA pursuant to TSCA section 8(e) which states "any person who manufactures, [imports] processes, or distributes in commerce a chemical substance or mixture and who obtains information which reasonably supports the conclusion that such substance or mixture presents a substantial risk of injury to health or the environment shall immediately inform the [EPA] Administrator of such information unless such person has actual knowledge that the Administrator has been adequately informed of such information." (15 U.S.C. 2607(e)) EPA receives and screens TSCA section 8(e) submissions covering a large number of chemical substances and mixtures on a wide range of chemical toxicity/exposure information. Although EPA's receipt of TSCA section 8(e) information does not necessarily trigger immediate regulatory action under TSCA or other authorities administered by EPA, all section 8(e) submissions receive screening level evaluations by EPA's Office of Pollution Prevention and Toxics (OPPT) to identify priorities for further Agency action and appropriate referrals to other programs. Section 8(e) data on newly discovered chemical hazards/risks is available via EPA's ChemView website (<https://chemview.epa.gov/chemview>).

Please respond to EPA (via the docket-docket ID EPA-HQ-OPPT-2015-0744 and provide a copy to me via response to this email) by **July 24, 2025**. Please feel free to reach out if you require more

time or have any questions.

Best,

Carolyn Hammack

Biologist

Chemical Testing Branch

Office of Pollution Prevention and Toxics

U.S. Environmental Protection Agency

Hammack.Carolyn@epa.gov

Phone: (202) 566-0521

WJC East 4410H

Consultation Questions for “Notification of Substantial Risk of Injury to Health and the Environment under TSCA Section 8(e)”

(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) Frequency of Collection

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

(3) Clarity of Instructions

- A. The ICR is intended to require that respondents provide certain data so that the Agency can utilize them.

- B. Based on the instructions (guidance documents, Federal Register Notices 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?

- C. Do you understand that you are required to maintain records?

- D. Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical, and easy to complete?

- E. Are there forms associated with this process? Do you use them? Are they clear, logical, and easy to complete?

(4) 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? Current electronic reporting alternatives include the use of web forms/XML based submissions via the Agency's Internet site?
- B. Are you keeping your records electronically? If yes, in what format?
- C. What benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information?

(5) Burden and Costs

- A. Are the labor rates accurate? **(Please see question 12 of the supporting statement)**
- 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?