

Attachment A

Consultation/Public Comment Summary

Stakeholders contacted:

- Color Pigments Manufacturing Association (CPMA)
- American Gas Association (AGA)
- Utility Solid Waste Activities Group (USWAG)
- A-Tec Recycling Services
- Lighting Resources, Inc.
- Emerald Transformer PPM, LLC.

Agency reach out

Good afternoon,

On December 4, 2025, the U.S. Environmental Protection Agency (EPA) published a notice in the Federal Register ([90 FR 55866](#)) announcing that EPA intends to submit an existing Information Collection Request (ICR) to Office of Management and Budget (OMB) that is scheduled to expire in July 2026. In compliance with the Paperwork Reduction Act, this document announces the availability of and solicits public comment on the ICR entitled “PCBs, Consolidated Reporting and Recordkeeping Requirements” and identified by EPA ICR No. 1446.15 and OMB Control No. 2070-0112, which enables EPA to meet its statutory obligations to regulate PCBs by obtaining sufficient information to conclude that specified activities do not result in an unreasonable risk of injury to health or the environment. EPA uses the information collected under the 40 CFR 761 requirements to ensure that PCBs are managed in an environmentally safe manner and that activities are being conducted in compliance with the PCB regulations. The information collected by these requirements will update the Agency's knowledge of ongoing PCB activities, ensure that individuals using or disposing of PCBs are held accountable for their activities, and demonstrate compliance with the PCB regulations. Specific uses of the information collected include determining the efficacy of a disposal technology; evaluating exemption requests and exclusion notices; targeting compliance inspections; and ensuring adequate storage capacity for PCB waste.

In addition to the public comment requested by the notice in the Federal Register, OMB regulations at 5 CFR 1320.8(d)(1) require agencies to consult with potential respondents and data users about specific aspects of an ICR.

As part of this required consultation, I am contacting you to solicit your input through the brief, **voluntary** questionnaire, attached below.

If you have any comments in response to the above questions, or with respect to any other part of this ICR, please respond by return e-mail by **COB on December 22nd**, or submit your comment to the docket EPA-HQ-OPPT-2017-0647 via www.regulations.gov. EPA will consider those responses, as well as any public comment received in response to the Federal Register notice identified above, in preparing a final document for OMB review.

We greatly appreciate your time and participation.

Consultation Question for Stakeholders

PCBs, Consolidated Reporting and Recordkeeping Requirements Consultation Questions for ICR Renewals

(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 (regulations, PR 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 and magnetic media-based submissions, *e.g.*, diskette, CD-ROM, etc. Would you be interested in pursuing electronic reporting?

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

Although the Agency does not offer an electronic reporting option because of CBI-related security concerns at this time,

- C. Would you be more inclined to submit CBI on diskette (CD or DVD) than on paper?

- D. 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?

- 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?

Stakeholder Response: None