



October 31, 2008

Ms. Susan Sharkey
Document Control Office (7407M)
Office of Pollution Prevention and Toxics (OPPT)
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

Re: **EPA-HQ-OPPT-2008-0504**

Dear Ms. Sharkey:

The Consumer Specialty Products Association (CSPA) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) information collection request (ICR) for the Partial Update of the TSCA Section 8(b) Inventory Data Base, Production and Site Reports as published in the Federal Register on September 5, 2008.

CSPA is a national nonprofit trade association representing 250 companies engaged in the manufacture, formulation, distribution and sale of specialty products for consumer and institutional use. CSPA member companies' wide range of products includes home, lawn and garden pesticides, antimicrobial products, air care products, industrial and automotive specialty products, detergents and cleaning products, polishes and floor maintenance products, and various types of aerosol products. These products are formulated and packaged in many forms and are generally marketed nationally.

A. Information Collection

It is not particularly clear what EPA is requesting through this ICR. The statement regarding the submission of production and site reports is vague. It would be useful if EPA could clarify what kind of data it is looking for with regards to "site reports", such as: production volumes, number of employees exposed to a chemical, the number of products that contain chemicals of interest, etc.

B. Public Availability

In many cases, any type of production records or site-specific reports would not be available from a public source.

C. Electronic Alternatives

CSPA is interested in an electronic reporting option that was used under the 2006 Inventory Update Rule (IUR). The use of Central Data Exchange (CDX), the encrypted Internet submission process, and the availability to use a secure electronic signature method is appropriate for this type of reporting in the future. CSPA members found the 2006 IUR reporting through CDX to be very efficient. Under this program, confidential business information was submitted in a secure fashion. Additionally, CSPA welcomes the idea of an encrypted reporting method as opposed to a paper or CD-ROM submission, which has the potential to be lost or shared.

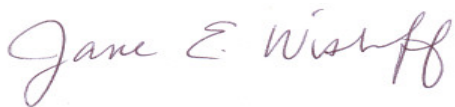
D. Burden Cost Analysis

EPA's estimated burden and cost estimate for compiling an information submission is severely underestimated at 485 hours. The completion of an IUR submission requires the gathering of a lot of data which must be obtained, many times, from different people and locations. Information regarding reaction products, production volumes, and employee exposure are not readily available to the individual responsible for submitting the IUR, and therefore a lot of time is spent scrutinizing formulas and finding the right people that are privy to the specific details needed to complete the IUR submission. Additionally, large companies can be very compartmentalized, which increases the time it takes to gather information for a submission such as IUR.

E. Summary and Conclusion

CSPA once again appreciates this opportunity to comment on this important issue and encourages EPA to continue using a collaborative process involving stakeholders in developing the most efficient process surrounding the Section 8(b) Inventory Data Base, Production and Site Reports. If you have any questions regarding our comments, please do not hesitate to contact me at 202-833-7303 or jwishneff@cspa.org.

Sincerely,



Jane E. Wishneff
Regulatory Counsel & Director of International Affairs