



Product Stewardship

July 27, 2021

By email: Danielle_Y_Jones@omb.eop.gov

U.S. Office of Management & Budget
Office of Information and Regulatory Affairs
The White House
1600 Pennsylvania Avenue
Washington DC 20500
Attn: Desk Officer for the EPA

Re: TSCA Section 8(a)(7) reporting and recordkeeping requirements for perfluoroalkyl and polyfluoroalkyl substances, 86 Federal Register 33926 (June 28, 2021)
Docket ID Number EPA-HQ-OPPT-2020-0549
EPA ICR number 2682.01

To Whom it May Concern:

Southwire Company LLC appreciates the opportunity to offer comments on the information collection request (ICR) announced June 28, 2021 by the US Environmental Protection Agency (EPA) regarding perfluoroalkyl and polyfluoroalkyl substances (PFAS). Our company is a US Based manufacturer of wire and cable used in the transmission and distribution of electricity.

While Southwire understands that EPA's action is authorized through amendments to the Toxic Substances Control Act (TSCA) in the Fiscal Year 2020 National Defense Authorization Act (NDAA), we are deeply concerned about the scope of the ICR and our company's ability to comply to the extent outlined in the proposal. The ten-year time horizon applicable to the data, the lack of exemptions for articles, trace quantities and small businesses, and the sheer number of PFAS that must be accounted for together constitute an unprecedented demand on manufacturers that we suspect most will be unable to fulfill.

To help moderate the burden this action will impose on obligated parties, Southwire urges OMB to recommend that EPA adopt the following changes to the ICR.

1. Limit the scope to specific PFAS (listed by Chemical Abstract Service Registry Number) that either are manufactured in high volumes or have been implicated through scientific research as possibly associated with human health or environmental effects.
2. Incorporate a *de minimis* threshold into the reporting obligation.



Product Stewardship

3. Amend the requirement that companies submit "*All existing information concerning environmental and health effects*" of PFAS. Manufacturers should not be responsible for the extensive literature searches needed to meet this request for such a vast and varied family of chemicals.
4. Eliminate or shorten the ten year "lookback" period of the ICR. Southwire does not possess adequate records to characterize product content or workplace environments in such detail over this time frame.
5. Incorporate a "small business" threshold that excludes companies below a certain size metric from this reporting obligation.

Southwire certainly recognizes EPA's authority to assess risk and the need to reach out to the industry to share data and expertise, but the ICR as it is proposed now is overly burdensome and should be amended.

If you have any questions or comments, please contact me at (770) 832-5359

Regards,

A handwritten signature in blue ink, appearing to read "Mark A. Rogers", is positioned below the "Regards," text.

Mark A. Rogers
Corporate Environmental &
Product Stewardship Coordinator