

TSCA Mercury Inventory Reporting Questions

Consultation Questions for Mercury Consultation Questions for the Information Collection Request (ICR) for TSCA Section 8(b) Reporting and Requirements: Response from NRDC

(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?

While some of the product-related data are collected by the states, the state data collection effort has been delayed and is now incomplete. In non-product areas, EPA's data are the only and best source of information.

- 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?)

IMERC Clearinghouse to a very limited extent,

(2) Frequency of Collection

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

No, the three-year cycle is sufficient to capture trends but still be current. The law specifies the frequency anyway, since the reporting requirement is linked to the inventory preparation obligation.

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

- B. What benefits do 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?