

September 9, 2016

Via E-Mail

Mr. Raymond J. Alwood
Chemical Control Division
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW.
Washington, D.C. 20460-0001

Re: Request for Comment Extension on Proposed Amendments to Significant New Uses of Chemical Substances; Updates to the Hazard Communication Program and Regulatory Framework; Minor Amendments to Reporting Requirements for Premanufacture Notices; Docket ID No. EPA-HQ-OPPT-2014-0650-0001

Dear Jim:

On behalf of the members of B&C[®] Consortia Management, L.L.C. (BCCM) groups, I respectfully request a 30-day extension to the comment period for the U.S. Environmental Protection Agency (EPA) proposal that would revise the *bona fide* procedures under Section 5 of the Toxic Substances Control Act (TSCA) for situations when significant new use terms are confidential, as notified in the July 28, 2016, *Federal Register* (81 Fed. Reg. 49598).

When the proposal was issued in late July, industry stakeholders were already steadfastly focused on addressing the EPA request for input on amended TSCA implementation activities associated with prioritization, risk evaluation, risk management and industry fee structures. Significant time and resources were spent in responding to this request, including participation at numerous stakeholder meetings and preparing written submissions by the August 23, 2016, deadline.

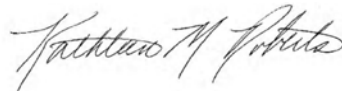
Now that the deadline for initial comment on the TSCA implementation issues has passed, we believe additional time should be afforded for industry groups to properly focus on the critical changes related to protection of confidential business information in the July 28, 2016, proposal, so that they can provide thoughtful and reasonable comments to EPA. Given the criticality of the proposed changes for industry groups, we believe the requested additional 30 -days, to ensure comprehensive stakeholder review, are warranted.

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Thank you for your consideration of this matter.

Sincerely,



Kathleen M. Roberts
Vice-President