

July 9, 2012

COMPLIANCE ALERT

NEW REPORTING REQUIREMENTS UNDER TSCA

The U.S. EPA has revised the reporting requirements under the *Toxic Substances Control Act (TSCA)*.

TSCA requires chemical **manufacturers** and **importers** to report chemical data to the EPA once every four years. There are over 84,000 chemicals listed in the *TSCA* inventory.

Historically, the *TSCA* reporting included only organic chemicals. The report has been expanded to cover **inorganic chemicals**, including metals and metal compounds.

Besides the reporting of consumer or industrial use chemical products that a facility manufactures, another important consideration is the **manufacturing of byproducts** at a facility. Common manufactured byproducts that may be reportable include:

- Metal Dross and Slag (including aluminum, zinc and other metals)
- Baghouse Dust
- Spent Etchant
- Spent Strippers

Reporting exemptions may be applicable based on the amount of the chemical manufactured or imported, the size of the company, and other criteria.

Admiral can review your process and determine the reporting requirements.

If you would like **Admiral** to evaluate your operation to determine the applicability under the *TSCA* regulation, please give me a call. You can also contact me at todd@admiralenv.com.

Todd P. Hedlund
Environmental Engineer

PS: Due to the complexity of the new rules, the U.S. EPA extended the reporting deadline to August 13, 2012. Although the deadline has already passed, the EPA is expecting many late filings for companies that are reporting under *TSCA* for the first time.