



# TSCA Reform Has Happened: What Do You Do Now?

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# Ten-Step TSCA Plan

## 1. Think About Your Planned New Products (and New Uses)

- Decide whether you really need/want to file a PMN (or SNUN) now or can wait until EPA works out the process for review and safety determinations, including information needs and testing orders.
- Think about what health and environmental effects data you already have.
- Think about an exemption (LVE, R&D, TME, LoREX, Polymers).

## 2. Know Your Current Products

- Know what you are making or importing.
- Notification re Active vs. Inactive chemicals will happen by December 2017.
- Make sure that what you are making or importing is on the TSCA Inventory.
- Discrepancies may cause problems as EPA reviews chemical notifications.

## 3. Know Your Uses

- EPA will consider the full range of current and foreseeable uses in a risk evaluation.
- Know the uses of the chemicals your make or import.
- Know the chemicals you use and what you use them for.
- Also be sure you know what your sales and marketing people are saying.



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## 4. Review EPA's TSCA Work Plan

- Do you make or import a Work Plan chemical?
- Are you using a Work Plan chemical?
- Will the chemical be up for early risk evaluation?

## 5. Strategize About Risk Evaluations

- Consider whether you should ask EPA to evaluate your chemical and its uses.
- Will another manufacturer ask EPA to evaluate the chemical and uses?
- Should you prepare a draft risk evaluation (on any chemical) to submit to EPA?

## 6. Assess Your Test Data

- Determine what data you already have on the chemicals you make and use.
- Think about how you would respond/react to a testing order.

## 7. Review Your CBI Claims

- For new chemicals, think about what you really need to keep confidential and whether you can substantiate your claim.
- Review your current chemicals and know what you claimed as CBI and why.



## 8. Think About SNUR Issues

- Do you want to make, import or use a SNUR'ed chemical?
- Will your customers want to use a SNUR'ed chemical?
- EPA will put more restrictions on chemical uses.
- Be sure that you can comply with SNUR notification requirements.

## 9. Evaluate Your Import & Export Compliance Program

- Be sure that your Section 13 import certifications are accurate, especially as EPA puts more restrictions on chemicals.
- Pay attention to the Section 12(b) export notification requirement; more chemicals will be listed as more rules and orders are issued.

## 10. Pay Attention to What EPA Is Doing

- Participate actively in EPA's stakeholder processes and meetings.
- Communicate/meet with EPA and comment on rules, guidance documents and policies, etc.

