TSCA and CDR Compliance Services

Trinity Consultants is a leading global environmental consulting firm that brings 50 years of experience providing services and solutions in the EHS Regulatory Compliance, Built Environment, Life Sciences, and Water & Ecology markets. Trinity has the technical expertise, industry depth, and specialized capabilities to help clients achieve their goals across the natural and built environments.

The Toxic Substance Control Act (TSCA) was promulgated on October 11, 1976 as 15 USC§ 2601-2692) and is implemented under 40 CFR Chapter 1 Subchapter R parts 700 to 799.

The Act consists of the following Titles:

- Title I - Control of Toxic Substances
- Title II - Asbestos Hazard Emergency Response
- Title III - Indoor Radon Abatement
- Title IV - Lead Exposure Reduction
- Title V - Environmental and Energy Issues in Schools
- Title VI - Formaldehyde Emissions from Composite Wood Products

The Act was amended in 1986, 1988, 1992, 2007, 2008, 2010, and 2016. The most recent amendment, The Frank R Lautenberg Chemical Safety for the 21st Century Act was passed by Congress in June 2016.

TSCA authorizes EPA to identify potentially dangerous chemicals in U.S. commerce that should be subject to federal control. The Act also authorizes EPA to gather and disseminate information about production, use, and possible adverse effects to human health and the environment of existing chemicals, and to issue "test rules" that require manufacturers and processors of potentially dangerous chemicals to conduct and report the results of scientific studies to fill information gaps. For chemicals new to U.S. commerce, TSCA requires pre-market screening of new chemical products. If EPA identifies unreasonable risks associated with existing or new chemicals, TSCA requires the agency to take regulatory action to reduce risks to a reasonable level. EPA may regulate the manufacture, importation, processing, distribution, use, and/or disposal of chemicals.

TSCA Compliance Support

Trinity offers comprehensive services to support your TSCA compliance needs. Whether we are preparing a Premanufacture Notice (PMN), implementing a Section 5 Exemption Strategy, negotiating with EPA enforcement, devising alternate consent order options, or preparing routine reports (Chemical Data Reporting [CDR] for example), we bring a wealth of experience successfully navigating the challenges within EPA.

CDR Assistance

The EPA requires U.S. companies to file Chemical Data Reporting (CDR) of substance volume, processing and use, and exposure information to protect the public from potential chemical risks. The CDR rule is required by section 8(a) of TSCA.

All U.S. based manufacturers and importers of TSCA inventory listed chemical substances meeting specific volume criteria are required by EPA to file CDRs through the Central Data Exchange (CDX). In addition, any chemical users and processors who manufacture byproduct chemical substances are also required to file CDR.

Trinity can provide comprehensive CDR assistance with report preparation and submittal support to chemical product manufacturers in various industries, including industrial products, consumer products, life science products, and international oil and gas producers. While most instances involved current reporting activities, we have also assisted in instances where support involved corrective reporting to EPA in the context of EPA enforcement or self-disclosure. When needed, we also support the EPA self-disclosure process alongside the CDR report preparation and submittal support.

Trinity also provides support in the following TSCA-related areas:

- Foreign Entity Trustee
- Self-disclosure/strategy
- Data procurement
- Consent Orders
- Risk evaluation
- Inventory "Active" change
- Export notification
- Compliance review/audit
- Nanomaterials
- Hazard classification
- Recordkeeping
- Internal controls

Supporting Clients with TSCA Compliance Challenge

TSCA Compliance Challenge	Trinity Support
New chemical substance approval	Prepare PMNs and exemptions; manage EPA review
Significant New Use Rule (SNUR) compliance	Guide compliant use of restricted chemicals
R&D Eligibility	Guide and confirm compliant chemical R&D activity
Manufacturer responsibilities	Advise on complaint chemical manufacturing practices
Importation responsibilities	Advise on appropriate TSCA certification, marking, and use
Enforcement inspections assistance	Train and assist with EPA audits and inspections
Chemical substance market eligibility	Verify and document TSCA Inventory listing and use approval
Chemical Data Reporting (CDR)	Guide and prepare periodic CDR reporting
Domestic sourcing obligations	Confirm TSCA eligibility of U.S. sourced chemicals
"Active" Inventory status	Verify TSCA chemical "Active" status eligibility
Test Rule compliance	Advise on compliance with Test Rule chemicals
Fines and penalties negotiation	Advise on EPA enforcement actions

Why Choose Trinity

In short, there's no better choice for your chemical compliance needs. Our experience is multi-faceted and extensive. Our team's understanding of the regulatory requirements and your industrial processes ensure that your project can be completed timely, accurately, and within budget.

ISO 9001:2015 certified at our corporate office in Dallas, Texas

CONTACT OUR TEAM!

For more information about how we can help your organization, please contact us.

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