

## Overview of TSCA Inventory Update Reporting (2006)

Information on chemicals manufactured or imported into the United States and listed on the TSCA Chemical Substances Inventory is collected periodically by the EPA. This collection began in 1986 with the promulgation of the Inventory Update Reporting (IUR) regulation. In 2003, EPA amended the IUR requirements to ensure that the data collected more closely match EPA's information needs.

By law, companies that manufacture or import chemicals are required to report information about these chemicals – the types of chemicals, the amounts manufactured or imported, certain details about their manufacture, and other data. The IUR regulations are in 40 CFR 710, Subpart C.

*Reported information can be claimed confidential, therefore limited information is made public.*

What companies are subject to reporting?	Manufacturers, including importers, of subject chemicals are required to report for IUR. Small manufacturers, as defined by 40 CFR 704.3, are exempted from reporting.
When is reporting required?	Reporting is required every five years. The 2006 submission period, during which 2005 production and import information was reported, ended in March 2007.  The next submission period occurs June 1 to September 30, 2011, when manufacturers will report information on their 2010 production.
What chemicals are subject to reporting?	Chemicals that are listed on the TSCA Inventory and are manufactured, including imported, in volumes of 25,000 pounds or more at a single site are subject to IUR. Typically information is collected on about 7,000 to 9,000 chemicals.
Are any chemicals exempt?	Certain chemicals – naturally occurring substances, microorganisms, polymers, and certain forms of natural gas – are exempt unless they are subject to another TSCA rule. In addition, certain chemicals are partially exempt, and manufacturers of such chemicals are only required to report identification and manufacturing information for those chemicals. The partially exempt chemicals are listed in the IUR regulations at 40 CFR 710.46(b).
What information is reported?  (see next page for detailed information)	Manufacturers, including importers, report basic company and site identity information, chemical identity, and manufacturing related data such as production volume, site-limited status, number of workers reasonably likely to be exposed, physical form of the chemical, and other information. Typically covers about 7,000 to 9,000 chemicals.  Manufacturers of larger volumes of chemicals – 300,000 pounds or more per site – report exposure-related information associated with the processing and use of their larger volume chemicals. Typically covers about 3,000 chemicals.
Where can I get more information?	The IUR website, <a href="http://www.epa.gov/iur">www.epa.gov/iur</a> , contains a variety of information and includes guidance documents and training presentations used for the 2006 IUR.

## Data Elements Reported

All reporters (25,000  
lbs or greater at a site)

### **Site Identification Information**

Company and site identification information  
Technical contact

### **Manufacturing Information**

Chemical name  
Chemical identifying number (usually CASRN)  
Site limited chemical?  
Manufacture or Import?  
Production volume – manufactured  
Production volume – imported  
Number of workers (in ranges)  
Maximum concentration (in ranges)  
Physical form (choose from list) and associated percent of production volume

Larger volume  
substances (300,000  
lbs or greater at a site)

### **Industrial Processing and Use Information**

Top 10 unique combinations of  
Type of process or use (choose from list)  
NAICS code (5-digit)  
Industrial function category (choose from list)  
For each unique combination of the above, report:  
Percent production volume  
Number of sites (in ranges)  
Number of workers (in ranges)

### **Commercial and Consumer Use Information**

Commercial and consumer product category (choose from list)  
Used in products intended for children?  
Percent production volume (for each category)  
Maximum concentration (for each category)

## Other Reporting Information

No reporting required (fully  
exempt) for:

- Polymers, including salts of polymers
- Certain forms of natural gas (listed substances)
- Microorganisms

Partial reporting required  
(partially exempt) for:

- Multi-component petroleum process streams (listed substances)
- Specific chemical substances for which the IUR processing and use information is of low current interest (listed substances)

Inorganic chemicals:

- For 2006 IUR, inorganic chemicals were partially exempt – reported only the identity and manufacturing information
- For 2011 and future IURs, no exemption for inorganic chemicals (report as per chart above)

Small manufacturers are  
fully exempt when:

- Total annual sales < \$4 million (company wide) OR
- Total annual sales < \$40 million (company wide) and production volume < 100,000 lbs (for a chemical substance at a single plant site).

*NOTE: Small manufacturers are still required to report on substances subject to a rule proposed or promulgated under certain sections of TSCA (40 CFR 710.46).*

## Inventory Update Reporting Ranges and Categories

<p><b>Ranges for Reporting Number of Workers Reasonably Likely To Be Exposed</b></p> <ul style="list-style-type: none"> <li>▪Less than 10 workers</li> <li>▪At least 10 but less than 25 workers</li> <li>▪At least 25 but less than 50 workers</li> <li>▪At least 50 but less than 100 workers</li> <li>▪At least 100 but less than 500 workers</li> <li>▪At least 500 but less than 1,000 workers</li> <li>▪At least 1,000 but less than 10,000 workers</li> <li>At least 10,000 workers</li> </ul>	<p><b>Ranges for Reporting Maximum Concentration of Chemical Substance</b></p> <ul style="list-style-type: none"> <li>▪Less than 1% by weight</li> <li>▪From 1 to 30% by weight</li> <li>▪From 31 to 60% by weight</li> <li>▪From 61 to 90% by weight</li> <li>▪Greater than 90% by weight</li> </ul>
<p><b>Physical Forms</b></p> <ul style="list-style-type: none"> <li>▪Dry powder</li> <li>▪Pellets or large crystals</li> <li>▪Water- or solvent-wet solid</li> <li>▪Other solid</li> <li>▪Gas or vapor</li> <li>▪Liquid</li> </ul>	<p><b>Industrial Processing or Use Categories</b></p> <ul style="list-style-type: none"> <li>▪Processing as a reactant</li> <li>▪Processing – incorporation into formulation, mixture or reaction product</li> <li>▪Processing – incorporation into article</li> <li>▪Processing – repackaging</li> <li>▪Use - non-incorporative activities</li> </ul>
<p><b>Numbers of Sites</b></p> <ul style="list-style-type: none"> <li>▪less than 10 sites</li> <li>▪at least 10 but less than 25 sites</li> <li>▪at least 25 but less than 100 sites</li> <li>▪at least 100 but less than 250 sites</li> </ul>	<ul style="list-style-type: none"> <li>▪at least 250 but less than 1,000 sites</li> <li>▪at least 1,000 but less than 10,000 sites</li> <li>▪10,000 or more sites</li> </ul>

<b>Industrial Function Categories</b>		
<ul style="list-style-type: none"> <li>▪Adsorbents and absorbents</li> <li>▪Adhesives and binding agents</li> <li>▪Aerosol propellants</li> <li>▪Agricultural chemicals (non-pesticidal)</li> <li>▪Anti-adhesive agents</li> <li>▪Bleaching agents</li> <li>▪Coloring agents, dyes</li> <li>▪Coloring agents, pigments</li> <li>▪Corrosion inhibitors and anti-scaling agents</li> <li>▪Fillers</li> <li>▪Fixing agents</li> <li>▪Flame retardants</li> <li>▪Flotation agents</li> </ul>	<ul style="list-style-type: none"> <li>▪Fuels</li> <li>▪Functional fluids</li> <li>▪Intermediates</li> <li>▪Lubricants</li> <li>▪Odor agents</li> <li>▪Oxidizing agents</li> <li>▪pH-regulating agents</li> <li>▪Photosensitive chemicals</li> <li>▪Plating agents and metal surface treating agents</li> <li>▪Processing aid, not otherwise listed</li> <li>Process regulators, used in vulcanization or polymerization processes</li> </ul>	<ul style="list-style-type: none"> <li>▪Process regulators, other than polymerization or vulcanization processes</li> <li>▪Reducing agents</li> <li>▪Solvents (for cleaning or degreasing)</li> <li>▪Solvents (which become part of product formulation or mixture)</li> <li>▪Solvents (for chemical manufacture and processing and are not part of product at greater than one percent by weight)</li> <li>▪Stabilizers</li> <li>▪Surface active agents</li> <li>▪Viscosity adjustors</li> <li>▪Other</li> </ul>

<b>Commercial and Consumer Product Categories</b>		
<ul style="list-style-type: none"> <li>▪Adhesives and sealants</li> <li>▪Agricultural products (non-pesticidal)</li> <li>▪Artists' supplies</li> <li>▪Automotive care products</li> <li>▪Electrical and electronic products</li> <li>▪Fabrics, textiles and apparel</li> <li>▪Glass and ceramic products</li> </ul>	<ul style="list-style-type: none"> <li>▪Lawn and garden products (non-pesticidal)</li> <li>▪Leather products</li> <li>▪Lubricants, greases and fuel additives</li> <li>▪Metal products</li> <li>▪Paints and coatings</li> <li>▪Paper products</li> </ul>	<ul style="list-style-type: none"> <li>▪Photographic supplies</li> <li>▪Polishes and sanitation goods</li> <li>▪Rubber and plastic products</li> <li>▪Soaps and detergents</li> <li>▪Transportation products</li> <li>▪Wood and wood furniture</li> <li>▪Other</li> </ul>