EPA Stakeholder Call on Fees Associated with EPA-Initiated Risk Evaluations

February 24, 2020

12:30 PM ET

Operator: Ladies and gentlemen, thank you for standing by in welcome to the Stakeholder Call on Fees Associated with EPA - Initiated Risk Evaluations conference call. At this time, all participants are in a listen only mode. After the speaker's presentation, there will be a question and answer session. To ask a question during this session, you will need to press star one on your telephone. Please note that the presenters will be answering questions as time permits. If you require any further assistance, please press star zero. And without further delay I would like to hand over the conference to the speaker Ryan Schmit, Sir you may begin.

Ryan Schmit: Thank you and again this is Ryan Schmit, I work in EPA's Office of Pollution Prevention and Toxics in the immediate office. I'm joined here with a number of my colleagues that work on the TSCA fees rule and the implementation processes associated with that. So, the purpose of this call is to refresh folks on the requirements associated with the TSCA fees rule finalized in 2018 and specifically those requirements that are associated with EPA-initiated risk evaluations. We also want to answer some frequently asked questions and talk a bit about next steps in the current process. We received quite a number of questions from folks in advance, which was very helpful for preparing for this call, so thanks to those who did so. I will try to answer and address as many as those as we can today.

With that said, there is a lot to cover, I'm not sure how much time we will have at the end of the call remaining to answer additional questions. However, we do remain committed to helping all of you understand the requirements associated with the TSCA fees rule and we'll of course continue to engage with you after this call. If you haven't visited our website already (www.epa.gov/tsca-fees), there's a wealth of information on the rule requirements and process, and I encourage you to take a look. We will also continue to improve our web content based on questions like those we received in advance of today's call.

I also want to mention from the start that we are in receipt of several requests to extend the comment period and self-identification window which currently ends on March 27th. We are strongly considering such an extension and you can expect to hear something from the agency soon on that.

So, before we dive into the TSCA fees rule and the associated requirements, I just want to provide a very quick background on TSCA fees and how we got here, and I'll be very brief on that. In 2016, as many of you probably know the Toxic Substances Control Act or TSCA was comprehensively amended. Among other things, the 2016 amendments provided EPA with expanded authority to collect fees, and to help defray a portion of the cost associated with overall TSCA implementation efforts including the cost of EPA initiated risk of evaluation.

TSCA required EPA to establish a new fee structure by rule, which we completed in October of 2018. Under that rule, there are now fees for test rules and orders under TSCA Sections 4, new chemical notices and exemption applications under TSCA Section 5, manufacture requested risk evaluations under TSCA Section 6, and EPA initiated risk evaluation also under Section 6 the fees that we're focusing on during today's call. In December of last year, EPA finalized high priority-designations for 20 additional chemicals effectively beginning the risk evaluation process for each. TSCA risk evaluations involve the development of a scoping document where EPA will identify the hazard exposures and conditions of use to be considered, an assessment of those hazards and exposures, a characterization of risks, and ultimately a risk determination, which may lead to additional risk management action. TSCA mandates that these activities be completed within three years with a possible six-month extension.

So, switching now to fees for risk evaluation activities. The total fee for a risk evaluation is $1,350,000 and that is the total fee that will be split amongst the identified responsible payers as I will describe later. So, who must pay a fee and I'll spend a fair amount of time here as many of the questions that we received in advance of this call focused on this area.

The TSCA risk evaluation fees apply to all manufacturers of the high priority substances, and TSCA defines manufacturer to include those who import, produce or manufacture the chemical. As such, the TSCA fees

rule requirements apply to all those who manufacture or produce the high-priority chemical, and this includes those who produce the chemical perhaps even coincidentally in association with another activity. As well as all those who import the high-priority chemical and this would include those who import the chemical within an article. Processors and downstream users who do not otherwise manufacture or import the chemical are not covered under the TSCA fees rule. Domestic manufacturers of products that might incorporate the high priority chemical into the product, but who do not actually make or import the high priority chemical are not covered.

And what about exemptions? This again was another area of strong interest from folks leading up to this call. As indicated previously, there are no exemptions for specific groups of manufacturers or importers or for specific types of manufacturing or importing activities. Many of you are likely very familiar with other TSCA regulatory programs such as our new chemicals program or reporting under the chemical data reporting CDR rule where there are a variety of exceptions.

Many of the questions we received in advance of today's call pose specific manufacturing or importing scenarios, which might have been exempted under other TSCA regulations, but are not exempted under the TSCA fees rule. So, let's go through some examples based on the questions that we received.

Import of a high-priority chemical in an article, as I already mentioned, is not exempt.

Manufacture of the high-priority chemical as a byproduct or an impurity is also not exempt. So, manufacture or production of the chemical (even without the specific intent to do so) nonetheless qualifies as manufacture under TSCA. The processing or use of one chemical sometimes results in the manufacture of another chemical substance. And if the high-priority chemical is manufactured as a byproduct during a processing activity - that activity is considered manufacture under TSCA and would be covered by the TSCA fees rule.

Manufacture or import of a high-priority chemical below a certain volume threshold is also not exempt. So, for example, the 25,000 pound threshold from the CDR rule is not applicable to TSCA fees.

Manufacture or import of a de minimis amount, there's not been a de minimis level defined in the rule.

Manufacture or import as a non-isolated intermediate is not exempt.

And similarly, manufacture or import for research and development is not exempt.

Some folks have questioned whether information that they believe suggests a low probability for exposure or risk from a particular activity or the fact that an activity is already regulated under another statute or program would excuse them from TSCA fee obligation. While these things may be relevant to EPA's analysis and conducting the risk evaluation, they do not exclude a manufacturer/importer from complying with the TSCA fees rule.

Others have asked whether those activities that are ultimately excluded from the scope of the risk evaluation will still have to pay a fee or whether refunds will be issued. Risk evaluation fees are not tied in any way to the scope of the risk evaluation. While EPA may determine to exclude some manufacture or importing activities from the scope of the risk evaluation, those entities must nonetheless comply with the requirements of the TSCA fees rule.

So, I will stop here for just a moment and note that we've heard from a number of you regarding some practical challenges raised by the lack of exemptions. We're looking into what options may be available to the agency to help address or lessen than these concerns. And as I mentioned earlier, we've received requests to extend the comment period and the window for self-identification and we're strongly considering doing so. So, again you can expect to hear something from the agency on this in the near future.

Now to move on and talk a bit about what's excluded, specifically some of the statutory exclusions in TSCA for certain activities.

Section 3 of TSCA for example excludes certain chemical manufacturing and importing activities from TSCA jurisdiction. Chemicals manufactured, processed, or distributed for use solely as a food, food

additive, drug, cosmetic, tobacco product, pesticide, and even some nuclear materials are excluded from the definition of chemical substance under TSCA Section 3 and are therefore not subject to TSCA fees rule requirements.

Likewise, under section 12 of TSCA manufacturing and import activities done solely for the purpose of exports from the United States are generally excluded from TSCA requirements including the TSCA fees rule. Some have asked whether a chemical that is manufactured solely for export and then is in fact exported but is subsequently re-imported whether that import activity would be subject to the rule. And again, if the substance is re-imported solely for the purposes of export, that activity would generally be excluded under TSCA Section 12.

Now I will speak a little bit about the process. To assign fees for risk evaluations under the rule, EPA must undergo a process to identify those manufacturers and importers. As such, fees for risk evaluations are a bit different than those for new chemical submissions. The responsible fee payers are not already identified. The rule lays out the agency's process for identifying responsible payers and generally involves publication of a preliminary list, a requirement for all manufacturers and importers to self-identify, a period of public comment and opportunity for correction of errors on that list, and publication of a final list that dictates who is responsible for paying the fee.

In January of this year, we published a preliminary list of manufacturers and importers associated with each of those chemicals and opened a 60-day period for self-identification and public comment. As required in the rule, all manufacturers and importers of high priority chemical must self-identify through EPA’s central data exchange or CDX system providing basic contact information. It's also an opportunity in CDX to certify as a small business concern and an opportunity to make certain certifications that would reduce or avoid the obligations altogether. I’ll walk through each of these elements in more detail.

First with respect to the preliminary list, to develop the preliminary list published in January, EPA looked to publicly available “manufacturer” reporting data from EPA's chemical data reporting rule and the toxics release inventory. While we considered using other sources of information, we ultimately chose to rely on these two sources for

development of the preliminary list. As such the preliminary lists are likely to be under inclusive. The EPA expects however that the preliminary list will be supplemented and refined during and following the comment period. And specifically, because the rule requires self-identification by all manufacturers of high priority chemical, irrespective of whether or not that entity is listed on the preliminary list, EPA expects the self-identification process will yield a more comprehensive and accurate final list responsible fee payers.

So, we are now in the midst of a public comment period during which manufacturers and importers of a high-priority chemical must self-identify. EPA's CDX system is set up to facilitate these responses consistent with the requirements in the rule. There's no separate form for folks to complete, all the responses made during this period should be made within the CDX system itself.

A number of you asked who can and should self-identify. The requirement to self-identify applies to the manufacturer or importer of the high priority chemical substance. If the company has multiple facilities or sites that manufacture or import the chemical, they need only self-identify once and pay one portion of the TSCA risk evaluation fee. An authorized official of the parent company can self-identify on behalf of multiple subsidiary companies. We've heard some potential interest in having trade associations or another entity self-identify of behalf of multiple numbers. While this is not currently supported in our systems, we are considering potential options to facilitate. And if this is something that others would be interested in, we would appreciate knowing that, feel free to reach out.

So, what's required to self-identify. We've been asked what this language looks like exactly, we hope that it's fairly straightforward. Once within CDX, it should be a simple check the box exercise and the language specifically says "I am a manufacturer or importer of the high priority chemical substance". It also requires provision of just basic company contact information. This information will be used to facilitate future communications with companies and, where appropriate, invoicing for a portion of the TSCA risk evaluation fee.

There are other certifications in CDX, which may or may not be applicable to your particular company. There's a certification for a small

business concerns, certification of cessation, a certification of no manufacture, and I'll talk a bit about each of those.

First the small business concern; making this certification would reduce your fee obligations by approximately 80%. This is another straightforward check-the-box certification indicating whether or not you are a small business concern as defined in the rule. It doesn't require the submission of any documentation or evidence. In short, a small business concern is based on an employee threshold that's associated with the company's particular NAICS code. The definition in the TSCA fees rules is modeled after the Small Business Administration's own definition. Several of you have asked how to calculate the number of employees when there are multiple subsidiary companies involved in the corporate structure. When calculating the number of employees, the company must include the employees of all parent and subsidiary companies within the corporate chain. So for example, a subsidiary company must count the employees of its parent company and other subsidiaries of that parent company in determining whether or not the company falls below the employee threshold in order to obtain the small business discount. If you have questions on whether your company meets the definition of a small business concerns, we do encourage you to check the website as there's some additional guidance listed there.

Moving on to the certification of cessation. This certification would eliminate your fee obligation altogether. It's an option that's available to those who *were* manufacturers or importers of the high-priority chemical, but can certify as to both having ceased the manufacture and import activity for the chemical prior to the cutoff date, which for these 20 high-priority chemicals is March 20th, 2019, the day before the prioritization process started for those chemicals. And secondly that the company won't restart the manufacturing or importing activity for a period of five years into the future. This option is available if you cease the manufacture or import activity prior to that cutoff date even if you still have a stock that is being sold or distributed.

Moving on to the certification of no manufacture language. This is another certification that results in no fee obligation. Companies can check the box to certify as to not manufacturing or importing the high-priority chemical in the last five years. This option is primarily for those who were incorrectly identified on EPA's preliminary list - those who do

not manufacture or produce, or import the high priority chemical - and seek to ensure that they are not identified on the final list. I want to be clear that this certification is not meant for those who do actually produce the chemical perhaps unintentionally or coincidentally such as the manufacture of the chemical is a byproduct or impurity, such manufacturers should be self-identifying as described earlier.

Some other errors that we've heard from some of you; one issue that we've heard is that multiple facilities owned by a single company were identified on a preliminary list. In such a case, the parent company should self-identify only once, and they can indicate in the "additional information" field in CDX that they are in fact self-identifying on behalf of the individual facilities listed on the preliminary list. This will ensure that the parent company - as opposed to individual facilities belonging to the parent company - is identified just once on the final list and is invoiced for one portion of the risk evaluation fee. But we also encourage the parent company in such a situation to submit a very brief comment in the docket stating those same facts.

So how do we actually self-identify? The first step is to log into the EPA's central data exchange. CDX is accessible via a link our TSCA fees website. And for those - many of those are probably already familiar with CDX, but for those who may not be - the website provides a link to instructions on how to register a new account. EPA's CDX home page also has some helpful frequently asked questions and there is a help desk that can walk you through the registration process. In addition, there's also user guide available with instructions on how to use the CDX application submit the payments.

Once a company is logged in to CDX, folks have been asking, "how to do I navigate to the appropriate screens to self-identify?". Once inside the CDX system, users will need to access the program titled "submissions for chemical safety and pesticides programs" also known as CSPP, and they need to do so as a primary authorized official of the company. After that the user can simply click on the TSCA risk evaluation rule application from the drop-down list followed by the initial response in the next drop-down list. Then users should just simply follow the directions on the screen to complete the initial response and submit, and as I mentioned earlier it should be fairly straightforward from that point. If

there are additional questions, there is a separate user guide available in CDX for this specific application, which may help to answer those.

Moving on to the final lists. After considering responses from manufacturers and importers and CDX, and any other public input, EPA will develop the final list of responsible fee payers. You can expect the EPA will publish those lists no later than concurrent with publication of the final risk evaluation scope documents or by approximately June of 2020. Manufacturers and importers identified on final list will be subject to a portion of the TSCA fee for the risk evaluation activity. The rules do not contemplate another opportunity for updates to the final list after its publication.

Manufacturers and importers may pay their fee individually or through a consortium of fee payers. Formation of a consortium is not a requirement, but it is something that EPA welcomes as it creates efficiencies to both the agency and consortium members, and would allow consortium members to determine amongst themselves an equitable allocation of fee responsibility. EPA supports formation of consortia through the CDX system. The rule requires that EPA be notified that a consortium has been formed and the names of its members within 60 days of publication of the finalist or for these chemicals, approximately August of 2020.

A number of you have asked how fee payments will be calculated for individual manufacturers and importers. Again, the total fee amount for an EPA-initiated risk evaluation is 1,350,000 dollars. This amount will be split amongst the manufacturers and importers identified on the final lists on a per capita basis with discounts for small businesses. The formula for allocating the fee amongst those payers is defined by the rule. It does not consider factors like production volume or market share. Many of you have asked how much you'll have to pay, which is a fair question. However, the amount each entity is ultimately responsible for will vary depending on the total number of fee payers identified and the number of small versus non-small businesses.

As an example, let's assume that there are hundred manufacturers and importers identified on the final list of responsible fee payers. Each then would be responsible for 1% of the total fee, a base amount of $13,500 dollars. Small business concerns - those who check the box within CDX - receive an approximate 80% discount off that base fee or $2,700 off, and

the remainder of the total fee would be divided amongst those non-small business entities. The rule on our website provide a description of how fees would be assessed in complex multiple payer scenarios when there is a mix of small and non-small businesses, individual payers and consortia.

Let's talk a little bit about invoicing. EPA expects to begin sending invoices through CDX shortly after the close of opportunity to form a consortium, which again is approximately August later this year because fee amounts are dependent on the number and the membership make up of those consortia. This is the earliest possible date that EPA can begin sending out invoices. Fee payments are then due 120 days from the publication date of the final scope of the risk evaluation or for these chemicals around the October 2020 timeframe. Fee payments also must be made within CDX.

So, I want to thank everyone again for listening to me for now close to half an hour and a special thanks to those who submitted questions in advance. We do have the phone line until 1:15. So, we have some time for questions. You can go ahead and turn to this now.

Operator: As a reminder in order to ask a question, you will need to press star one on your telephone. Again, that is star one. If you wish to remove your question, you may press the pound key. The first question is from Rich Angler.

Rich Angler: Hi. I was curious Ryan about if a corporate parent self identifies, you mentioned that the company should list its sites in the additional information and come into the docket. If a corporate parent has a number of subsidiaries, should that corporate parent do the same thing for its subsidiary companies and not just sites?

Ryan Schmit: Yes, thanks for the question Rich. I guess to clarify the scenario that we are discussing was one where perhaps multiple facilities, and if I understand the question correctly, the same would apply for a situation where multiple subsidiary companies were identified. The parent company can self-identify on behalf of those individual facilities or sites or subsidiary companies one time in CDX and the advice that we're providing to folks is - to the extent that subsidiary companies, sites or facilities were incorrectly identified on the preliminary list – they can

make a note of that in the CDX system, in the additional information field, along with a short comment to the docket. In that way, we can ensure that the preliminary list is adjusted appropriately when we publish the final list.

Rich Angler: Great. Thank you.

Operator: Thank you. The next question is from Robert Molinaro.

Robert Molinaro: Hi. This is Rob Molinaro from Zebra. I was interested in knowing if there'll be a de minimis amount below which a company does not have to self-identify especially with regards to the import of articles that may contain high priority chemical?

Ryan Schmit: Thank you for the question. Again, there are no exemptions that are defined in the fees rule itself including there's no de minimis type level that's been defined in the rule. So, again we're sensitive to the challenges that this provides, we're currently considering what options we might have to help facilitate compliance and help ease some of the challenges and burdens that are associated with this rule.

Operator: The next question is from Matthew Hodges.

Matthew Hodges: Hi. This is Matthew Hodges with Valero. I'd like to know if manufacturing is going to be inclusive of what I'm going to kind of characterize as secondary atmospheric chemistry where a substance is produced in minute quantities as exhaust from combustion sources like combustion turbines and heaters and boilers, and not through what would typically be considered a manufacturing line, where there's a specific product being produced.

Ryan Schmit: Thank you. Another good question. So, manufacture is defined in TSCA - the law itself - to include import as well as manufacture and production of the chemical, and there are no exclusions for manufacture of chemicals that occur as you described in a secondary way, as a byproduct, or unintentionally or coincidently in association with another process. If the chemical is produced, it's considered manufactured under TSCA and such an activity would be subject to the TSCA fees rule requirements.

Operator: Thank you. The next question is from Pat Rizzuto.

Pat Rizzuto: Hi. Thank you, Ryan. I'm curious what happens if there's a consortium and then several companies that chose not to belong to the consortia. How is the fee allocated in a situation like that?

Ryan Schmit: Thanks Pat. So, again in some areas where there are a mix of consortia and individual players, small and non-small businesses, the calculation of payments can get a bit complex, but essentially the fee is calculated on a per capita basis. So, it depends on the total number of manufacturers and importers who are identified including those that would decide to form a consortium. For example if 50% of all manufacturers and importers join a consortium, 50% do not and - this is over-simplifying - but the consortia would still be responsible for 50% of the payment. Does that make sense? I hope that makes sense.

Pat Rizzuto: Yeah, it helped. Thank you.

Operator: Thank you. Your next question is from Kathleen Roberts.

Kathleen Roberts: So, Ryan, I swear Pat and I did not coordinate on this question, but I'm going to follow up on your example then on the 50% in consortia and out of consortia. So, the consortia is invoiced 50% and then the consortia members can then decide how to allocate that fee that they've been invoiced among themselves as long as the consortia pays the full 50% that EPA has invoiced? Hopefully, you followed my logic there.

Ryan Schmit: That's correct. So, that's one of the benefits of a forming consortia instead of EPA allocating fee responsibility individually to individual manufacturers and importers. Consortia can decide how best to allocate that amongst its membership.

Kathleen Roberts: Okay. Thank you Ryan. Much appreciated.

Operator: Thank you. Your next question is from Ann Grimaldi.

Ann Grimaldi: Hi Ryan. I'd appreciate it if you could confirm that retailers are covered by the rule if they import consumer products containing a high-priority chemical and if that's the case, is EPA going to be doing anything in particular to get the word out to retailers since they're not usually captured under TSCA obligations?

Ryan Schmit: Yes, thanks for the question Ann. So, the rule doesn't discriminate against retailers if retailers are indeed importing a product that contains high priority chemicals. So, retailers to the extent they're importers would be covered by the TSCA fees requirements. We are taking a number of steps to try to communicate about the requirements of the TSCA fees rule including this call, but there's also some additional events that we have planned in the future - conferences and other potential opportunities. In addition, we hope that our website will be a good resource for helping people to understand the requirements associated with the TSCA fees rule.

It's a new process for all of you just as it is a new process for the agency. We're looking for ways to work collaboratively to help people understand and comply.

Operator: Thank you. The next question is from Sarah Strano.

Sarah Strano: Hello. My question is regarding determining what byproducts might be produced in the manufacturing process. So if a chemical is manufactured as a byproduct, I guess what data sources are appropriate or acceptable to use to determine if a byproduct is manufactured or not if we don't have like what published emissions factors be acceptable if you don't actually have data from samples that we've taken?

Ryan Schmit: Yes. So, thanks again for the question. If I'm understanding the question correctly and feel free to correct me if I'm not. You're talking about a situation where a company may not be aware of whether or not they are manufacturing a chemical and the rule itself doesn't speak to that directly, and I don't currently have advice on what a company should be doing to find that out. Again the question I can take back to the team here and hopefully we can provide some more guidance on that in our future, but I appreciate the question.

Operator: Thank you. Your next question is from Amanda Tuesdale.

Amanda Tuesdale: Hi Ryan. Could you help clarify if your company separated from some portion of its company and sold it off during that five-year back period. How or who would be responsible for self-identifying?

Ryan Schmit: I'm not sure if I followed the question exactly. I gather that you're suggesting a hypothetical where there was a change in corporate ownership, but I didn't catch when the change occurred. Could you clarify that?

Amanda Tuesdale: Sure. Within the five years back per say, this is just hypothetically say was somewhere like 2017 for instance and that material is no longer produced or imported by yourself or your current company, but the previous version of the company had activity in those areas that is now belonging to the separate entities. Who would be responsible for self identifying?

Ryan Schmit: Okay. Thank you. Thanks for the clarification. So, the self-identification requirement would apply to the current manufacturer importer, To the extent that the previous company was identified on the preliminary list, there would be an opportunity for that company to remove itself from the final list by going into CDX and certifying that they had ceased manufacture, which in this scenario would be ceasing manufacture by virtue of change in corporate ownership.

Operator: Thank you. Your next question is from Brett Calvin.

Brett Calvin: Hi. I'm just wondering what's the best way to estimate the fee or like a range of what the fee might be that a given company might see for a specific chemical?

Ryan Schmit: Again, it's a fair question and it really depends on the number of manufacturers and importers that are ultimately identified. You can see from the preliminary list that there's a fairly broad range. A chemical like formaldehyde for example is likely to have quite a number of manufacturers whereas some of the other chemicals are likely to have just a handful. So, it'll vary by the chemical, but again if you're looking at the

preliminary list, if you divide that number, divide the total TSCA fee 1.35 million by the number that's been identified, that should give you a general sense.

Brett Calvin: Sure. Where is that preliminary list?

Ryan Schmit: So, all the preliminary lists are published in our docket. We put out a Federal Register notice of availability of them. So, they're all available in our docket, which can be accessed through regulations.gov and also through our website again, put another pitch out for www.epa.gov/TSCA-fees. There should be a link within that website to access the preliminary list. Each of them are published in two different formats, a PDF document as well as an Excel document, and there's also a helpful document titled "read me" which is some instructions about how to read and understand the lists themselves.

Brett Calvin: Thank you.

Operator: Thank you. The next question is from Azita Khalili.

Azita Khalili: Thank you. My question was basically that this current 1.3 million that you're speaking of is for the 20 high priority chemicals. It has nothing to do with the previous initial 10 high priority chemicals and future high priority chemicals. Is that correct?

Ryan Schmit: Essentially that's correct. So, the fees rule, and this was addressed during the development of the rule itself, the agency determined not to assign any fees associated with the first 10 chemical risk evaluations that are underway now and have been underway since late 2016 I believe. So, in terms of future risk evaluations, we likely won't be completing the current 20 risk evaluations for some period of time, but to the extent that we finalize additional chemicals as high-priority substances, the current fees rule would apply to those as well. So, again it's 1.35 million dollars per risk evaluation activity. So, it'd be 1.35 for each of the 20 chemicals that are undergoing risk evaluation now.

Operator: Thank you. Your last question is from Kamilah Jones.

Kamilah Jones: Hi Ryan. I just wanted to say thank you for your recognition of the challenges for manufacturers and importers in complying and understanding these rules. I was just wondering when we can expect any issuance of enforcement guidance especially when it comes to importers of articles of de minimis amounts? I know you may not have an exact date, but if it would be like before final lists are published, before fee payments are due, any guidance on that?

Ryan Schmit: Yes, thank you. Excellent question. Again, as you suggested, we're not really in a position today to provide any sort of definitive timeline for such additional guidance, however, it would certainly be before issuance of the final lists, which has played into our decision or our thinking rather on potentially extending the current comment period. Again, that period closes currently March 27th and we're thinking very strongly about extending that.

Kamilah Jones: Thank you.

Operator: Ladies and gentlemen, this concludes the Q&A session. I would like to turn back to Mr. Ryan Schmit for closing.

Ryan Schmit: Thank you and again, thanks to all those for listening for the past 45 minutes or so. Again, thank for all the questions that were submitted. I believe that like the call that we did in December, there'll be a transcript made available. We'll post that again on our website.

Again, we do recognize the challenges that this rule presents to the regulated community. It's a new requirement and process for all of you, and it's a new requirement process for the agency and we appreciate your patience and engagement as we work through the various implementation complexities. Stay tuned again about a possible extension of the common period and the window for self-identification, and you can expect to hear something from us on that in the very near future. Again, we're here to help answer any questions that you may have and feel free to reach out to either myself or any other member of the team, and we'll do our best to answer your questions. With that, I will turn it back to our operator.

Operator: Thank you, Sir. Ladies and gentlemen, this concludes today's conference call. Thank you for your participation and have a wonderful day.