

TSCA Chemical Data Reporting

Fact Sheet: Reporting After Changes to Company Ownership or Legal Identity

This fact sheet provides information for persons who may be subject to the Chemical Data Reporting (CDR) rule about issues related to changes to company ownership or legal identity which may affect reporting for the most recent reporting period.

The primary goal of this document is to help the regulated community comply with the requirements of the CDR rule. This document does not substitute for that rule, nor is it a rule itself. It does not impose legally binding requirements on the regulated community or on the U.S. Environmental Protection Agency (EPA).

The CDR rule, issued under the Toxic Substances Control Act (TSCA), requires manufacturers (including importers) to give EPA information on the chemicals they manufacture domestically or import into the United States. EPA uses the data, which provides important screening-level exposure related information, to help assess the potential human health and environmental effects of these chemicals and makes the non-confidential business information it receives available to the public.

General Principles for Reporting Under CDR

- Under 40 CFR 711.8(a), the reporting obligation falls to the “person who manufactured.”
- EPA recognizes that in some cases, business transactions occurring during the calendar years for the reporting period (e.g., for 2020 CDR, calendar years 2016 to 2019) have led to questions about who is now the “person who manufactured.” The scenarios below are intended to serve as a general aid in appropriately resolving these questions, but they will not necessarily account for all the relevant circumstances of a particular transaction.
- It is ultimately the manufacturer’s responsibility to report appropriately under CDR, notwithstanding the complexity of its own business transactions.

General Scenarios Involving Company Changes

1. **One company changes its company and/or site name** (e.g., a company has changed its company name and/or a site name during the calendar years for the reporting period).
 - The company should report to CDR using its current business name and the current site name. Use current information even if the reporting is with respect to manufacture that occurred while the manufacturer was doing business under a prior company or site name.
2. **Two companies are co-manufacturers at a site** (e.g., two parties undertake to manufacture a chemical substance at a single site)
 - When two companies meet EPA’s definition of “manufacturer” because they co-

manufacture a particular volume of chemical substance at a particular site (see 40 CFR 711.3 for the definition of “manufacture” and “manufacturer”), the manufacturers may determine among themselves which one of them will report the full volume that they together manufactured at that site.

- However, if no report is submitted when one is required, EPA may hold each co-manufacturer liable for the failure to report. See 40 CFR 711.8 (“any person who manufactured” is subject to CDR).
3. **One company becomes two companies** (e.g., a manufacturing division of Company X is separated from Company X to become Company Y)
 - Company X and Company Y should determine, based on the circumstances of their reorganization, whether Company Y was created as the continuation of the part of Company X that previously conducted the manufacture of the pertinent substance(s).
 - If Company Y is the continuation of the part of Company X that manufactured the pertinent substance(s), then Company Y reports based on all the manufacturing that Company X did during the calendar years of the reporting period (e.g., for 2020 CDR, 2016 to 2019), including the manufacturing that it did while it was a unit of Company X.
 - If Company Y is not the continuation of the part of Company X that manufactured the pertinent substance(s), then Company Y only reports based on the manufacturing that it did after it was created, and Company X reports separately based on its own manufacturing.
 - If Company X is a U.S. company that owns at least 50% of Company Y’s voting stock, then Company Y reports Company X as its U.S. parent company. See 40 CFR 711.15(b)(2)(i).
 4. **Two companies become one company** (e.g., (1) one company ceases to have a separate identity, because it has been combined into another company; or (2) two companies cease to have their separate identities, because they have combined to form a new company.)
 - The resulting company would report based on the combination of the manufacturing conducted by the original companies during the calendar years of the reporting period (e.g., for 2020 CDR, 2016 to 2019).
 5. **One company takes ownership of another company; the two companies maintain their separate identities** (e.g., acquiring company buys at least 50% of the voting shares of an acquired company. The acquired company continues to exist as a separate legal entity.)
 - The acquired company continues to report as usual, except that if its owner is a U.S. Company, the acquired company now reports its owner as its U.S. Parent Company.
 - The owner does not submit duplicates of the reporting submitted by the acquired company.
 6. **A part of one company becomes a part of a different company; two companies continue to exist** (e.g., Company X combines with a part of Company Y, acquiring all of the assets of that unit of Company Y and assuming all of its liabilities. The remainder of Company Y continues to exist as a separate legal entity.)
 - Company X reports based on the manufacturing subject to CDR that it did during the calendar years of the reporting period (e.g., for 2020 CDR, 2016 to 2019) including the manufacturing that the newly combined unit did before it combined with Company X.

- Company Y reports based on any manufacturing subject to CDR that it did during the calendar years of the reporting period (e.g., for 2020 CDR, 2016 to 2019) excluding the manufacturing that the divested unit did between those same calendar years.
7. **One company purchases a site from another; two companies continue to exist** (e.g., Company X purchases real estate and chemical manufacturing equipment from Company Y. But Company X does not combine with Company Y. Both companies continue as separate legal entities)
- Company X is responsible for reporting the manufacturing that Company X itself conducted at the site during the calendar years of the reporting period (e.g., for 2020 CDR, 2016 to 2019).
 - Company Y is responsible for reporting the manufacturing that Company Y conducted at the site during the calendar years of the reporting period (e.g., for 2020 CDR, 2016 to 2019).
8. **One company closes a facility at a site; that company continues to exist** (e.g., a company ceases manufacturing operations at a site, but the company continues to exist as a legal entity)
- The company reports based on the manufacturing it did at the site during the calendar years of the reporting period (e.g., for 2020 CDR, 2016 to 2019), even though the site is now closed.

Accessing Form U after Companies Combine

EPA expects that the company remaining after two companies combine should generally have access to the records of the one or more prior organizations that have ceased to exist as separate entities. EPA expects that these records would include the XML file from the past submission's Copy of Record and the associated passphrases. These records would allow the remaining entity to access the appropriate Form U data for the organization(s) that have ceased to exist as separate entities.

However, if the remaining entity cannot obtain the records of an organization it recently combined with and/or cannot obtain access to that organization's passphrase, the entity should mail a notarized letter on official letterhead to the Agency explaining why it is authorized to have the information submitted in a previous CDR submission period. This letter should be sent to:

By U.S. Postal Service:
CDR Coordinator (7407M)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460
202-564-8930; 202-564-8940

By Hand Delivery or Courier:
CDR Coordinator
U.S. EPA – OPPT/CBIC
William Jefferson Clinton East Building,
Room 6428
1201 Constitution Ave., N.W.
Washington, D.C. 20004-3302

Application of Reporting Requirements in Different Scenarios¹

- 1. Company Y manufactured 100,000 lbs/year of a chemical at one site in 2016, 2017, and 2018. In January 2019, Company Y manufactured 5,000 lbs of the chemical at the same site. On February 1, 2019, Company Y sells, to Company Z, the unit of its business that manufactures the chemical. This manufacturing unit becomes a part of Company Z. The remainder of Company Y still exists as a separate company, but it does not manufacture the chemical after February 1, 2019. The divested manufacturing unit, now a part of Company Z but still at the same site, manufactures an additional 95,000 lbs of the chemical in the remainder of 2019. Assuming the reporting threshold is 25,000 lbs, what are the reporting obligations of each company for the 2020 CDR submission period?**

See the general discussion of when a part of one company becomes a part of a different company; two companies continue to exist. (General Scenario 6)

It is given in the scenario that the entity which manufactured 100,000 lbs/year in 2016, 2017, and 2018 is a part of Company Z by the time of report submission. Therefore, Company Z reports the 100,000 lbs/year manufactured in 2016-2018. Company Z also reports the total 100,000 lbs manufactured in 2019. The unit that manufactured 100,000 lbs of the chemical in 2019 is a part of Company Z at the time of reporting, and thus Company Z manufactured a total of 100,000 lbs of the chemical at the site in 2019. Company Z reports processing and use information for its 2019 production volume along with the additional manufacturing information required.

Company Y does not report the manufacturing of this chemical, because at the time of report submission it no longer owned the unit that manufactures the chemical and did not manufacture the chemical after the transfer of ownership. Note that the transfer of ownership was for the whole manufacturing unit, including both the assets and the liabilities (e.g., the requirement to report under CDR).

- 2. Company X manufactures 30,000 lbs of a chemical included in the TSCA inventory and not otherwise exempted from CDR reporting at one site in January 2019 (the principal reporting year for 2020 CDR). Company X forms a wholly owned subsidiary, Company Y. On February 1, 2019, Company Y assumes all rights and liabilities with respect to manufacturing activities at the site and manufactures 180,000 lbs of the chemical from February through June 2019. On July 1st, Company Y fully separates from the parent company (Company X) and becomes an independent publicly traded company. Company Y manufactures an additional 200,000 lbs of the chemical at the site from July through December 2019. How should the reporting of the volumes, processing and use information and additional manufacturing information be handled for the 2020 CDR submission period?**

See the general discussion of when one company becomes two companies. (General Scenario 3)

A 25,000 lbs reporting threshold is assumed. It is given that Company Y was created as a subsidiary of Company X on February 1, 2019 (the principal reporting year), but that it was

¹ Years given in these scenarios are used only as examples for the particular submission periods.

not fully independent of Company X until July 1, 2019.

Company X and Company Y report differently depending on whether Company Y was created as the continuation of Company X's unit for manufacturing the chemical substance.

If Company Y was created as the continuation of Company X's unit for manufacturing the chemical, then:

Company Y reports a total of 410,000 lbs (30,000 + 180,000 + 200,000) for 2019 and reports processing and use information along with the additional manufacturing information required for 2019 using the total production volume. If the chemical substance was not manufactured in 2016 to 2018, then Company Y would report 0 lbs for production volume for those years. If the unit (previously part of Company X) manufactured the chemical substance during 2016 to 2018, Company Y would report that data also.

Company X does not submit reports for any of this manufacture, because Company X is not the manufacturer.

If Company Y was not created as the continuation of Company X's unit for manufacturing the chemical, then:

Company Y reports the 380,000 lbs (180,000 + 200,000) it manufactured in 2019. Company Y reports processing and use information along with the additional manufacturing information required for its 2019 production volume. Company Y would report 0 lbs production volume for 2016 to 2018.

Company X reports the 30,000 lbs of the chemical it manufactured in 2019 and processing and use information along with additional manufacturing information for 2019, because the reporting threshold was exceeded. If Company X manufactured the chemical during 2016 to 2018, Company X would report those data also. If the chemical was not manufactured in 2016 to 2018, then Company X would report 0 lbs for production volume for those years.

3. In the following scenarios, Company RUS sells all or part of its business to Company LBO. Both companies are U.S. companies. What are the reporting obligations in 2020 for the companies?

3.1. Company RUS produced 30,000 lbs/year of a chemical from 2016 to 2019. Company RUS was acquired wholly by Company LBO in 2018. Company RUS and Company LBO continue doing business as separate entities; they do not merge.

See the general discussion of when one company takes ownership of another company, with the two companies maintaining their separate identities. (General Scenario 5)

It is given in the scenario that there is no combination of LBO and RUS (i.e., RUS and LBO continue to have separate identities, even though LBO now owns RUS).

Company RUS reports the 30,000 lbs/year that it manufactured from 2016 to 2019. Company RUS reports processing and use information along with the additional manufacturing information required for its 2019 production volume.

Company LBO is not the manufacturer of the 30,000 lbs of the chemical that Company RUS manufactured each year between 2016 and 2019. Company LBO is simply the owner of Company RUS (which is the manufacturer). Company LBO does not report

what it did not itself manufacture.

Because Company LBO is a U.S. Company, Company RUS reports that Company LBO is its U.S. Parent Company.

- 3.2. Company RUS was acquired wholly by Company LBO in 2014. Company RUS and Company LBO continue doing business as separate entities; they do not merge. Company RUS manufactured 10,000 lbs of a chemical at one site in 2016. At the same site, Company LBO manufactured 10,000 lbs of the same chemical (for which a SNUR was published in 2017) only in 2019.**

See the general discussion of when one company takes ownership of another company, with the two companies maintaining their separate identities. (General Scenario 5)

It is given in the scenario that there is no combination of LBO and RUS (i.e., RUS and LBO continue to have separate identities, even though LBO owns RUS).

The relevant reporting threshold is 2,500 lbs, because at the beginning of the submission period in 2020, the chemical is the subject of a SNUR.

Company RUS reports the 10,000 lbs it manufactured in 2016, because 10,000 lbs exceeds the reporting threshold of 2,500 lbs. Company RUS reports 0 lbs for 2017, 2018, and 2019, and thus does not report processing and use or the additional manufacturing information required for 2019.

Company LBO reports the 10,000 lbs it manufactured in 2019, because 10,000 lbs exceeds the reporting threshold of 2,500 lbs. Company LBO reports processing and use information plus additional manufacturing information for its 2019 production volume of the chemical. Company LBO reports 0 lbs for 2016, 2017, and 2018.

Because Company LBO is a U.S. Company, Company RUS reports that Company LBO is its U.S. Parent Company.

- 3.3. Company RUS was acquired wholly by Company LBO in 2018. Company RUS manufactured 2,000 lbs of a chemical at one site in 2016. Company RUS and Company LBO continue doing business as separate entities; they do not merge. At the same site, Company LBO manufactured the same chemical (for which a SNUR was published in 2019) at 1,000 lbs in 2018 and 10,000 lbs in 2019.**

See the general discussion of when one company takes ownership of another company, with the two companies maintaining their separate identities. (General Scenario 5)

It is given in the scenario that there is no merger of LBO and RUS (i.e., RUS and LBO continue to have separate identities, even though LBO owns RUS).

The relevant reporting threshold is 2,500 lbs, because at the beginning of the CDR submission period, the chemical is the subject of a SNUR.

Company RUS does not report. It only manufactured the chemical in 2016, and it manufactured less than the reporting threshold of 2,500 lbs.

Company LBO reports the 1,000 lbs of the chemical it manufactured in 2018 and the 10,000 lbs it manufactured in 2019, because the 10,000 lbs in 2019 exceeds the reporting threshold of 2,500 lbs. Company LBO reports processing and use information along with the additional manufacturing information required for its 2019 production volume of the chemical. Company LBO reports 0 lbs for 2016 and 2017.

- 3.4. Company RUS sold the part of its business that produces Chemicals A, B and C to Company LBO in 2018. This part of Company RUS merged into Company LBO. Company RUS produced Chemical A at 30,000 lbs/year from 2016 to 2018. Company RUS produced Chemical B at 100,000 lbs only in 2016. Company RUS produced Chemical C at 10,000 lbs in 2016 only. Chemical C had a final SNUR published in 2017. Company LBO did not manufacture any of Chemicals A, B, or C in 2018 or 2019. The remaining part of Company RUS continued in business and continued to produce Chemicals D (40,000 lbs/year) and E (2,000 lbs/year) in 2018 and 2019.**

See the general discussion of when a part of one company becomes a part of a different company; two companies continue to exist. (General Scenario 6)

It is given in the scenario that there has been a combination of part of Company RUS into Company LBO, involving the business unit that manufactured Chemicals A, B, and C. In 2020, this unit is now a unit of Company LBO.

The reporting threshold for Chemical C is 2,500 lbs, because at the beginning of the submission period, Chemical C is the subject of a SNUR. The reporting threshold for the other chemicals is 25,000 lbs.

Company LBO reports its manufacture of 30,000 lbs of Chemical A for each year between 2016 and 2018; its manufacture of 100,000 lbs of Chemical B in 2016; and its manufacture of 10,000 lbs of Chemical C in 2016 (the reporting threshold for Substance C is 2,500 lb). Company LBO does not need to report processing and use information or any additional manufacturing information for Chemicals A, B, and C, because Company LBO will be reporting 0 lbs for those chemicals in 2019. Company LBO will also report 0 lbs for Chemicals B and C in 2017 and 2018.

Company RUS does not report this manufacture because (by 2020) the business entity that manufactured Chemicals A, B, and C during 2016-2018 is not a part of Company RUS.

However, Company RUS reports its manufacture of 40,000 lbs/year of Chemical D in 2018 and 2019 (including processing and use information and additional manufacturing information for the 2019 production volume) and reports 0 lbs of Chemical D for 2016 and 2017. Company RUS does not report its manufacture of Chemical E in 2018 and 2019 because the production volume is below the reporting threshold of 25,000 lbs in both of those years.

- 3.5. Company RUS sold the unit of its business that produces Chemicals A, B and C on January 1, 2018 to Company LBO. This unit of Company RUS merged into Company LBO. This business unit produced the following (all at Site Alpha): Chemical A at 30,000 lbs/year from 2016 to 2019; Chemical B only in 2016 at 100,000 lbs; and Chemical C only in 2016 at 10,000 lbs. Chemical C had a final SNUR published in 2017. Before acquiring the business unit from Company RUS, Company LBO manufactured the following (all at Site Beta): 30,000 lbs/year of Chemical A in 2016 and 2017. In 2018 and 2019, Company RUS went on to produce the following (all at Site Alpha): Chemicals D (40,000 lbs/year) and E (2,000 lbs/year).**

See the general discussion of when a part of one company becomes a part of a different company; two companies continue to exist. (General Scenario 6)

It is given in the scenario that there was a business transaction whereby a part of Company RUS became instead a part of Company LBO. This involved the business unit that

manufactured Chemicals A, B, and C at Site Alpha from 2016 to 2019. By 2020, this business unit is a part of Company LBO.

The reporting threshold for Chemical C is 2,500 lbs, because at the beginning of the submission period, Chemical C is the subject of a SNUR. The relevant reporting threshold for the other substances is 25,000 lbs.

For Company LBO, the production volumes given in the question are presented in the first two rows of the table below. Company LBO reports both its manufacture at Site Alpha and its manufacture at Site Beta (separately for the two sites). All of Company LBO's production volumes are above the relevant reporting thresholds. Company LBO reports processing and use information and additional manufacturing information for its 2019 production volume at Site Alpha.

Company and Site	Production Volume (lbs)			
	2016	2017	2018	2019
Reportable LBO Production at Site Alpha	30,000 of A 100,000 of B 10,000 of C	30,000 of A	30,000 of A	30,000 of A
Reportable LBO Production at Site Beta	30,000 of A	30,000 of A	0 of A	0 of A
Reportable RUS Production at Site Alpha	0 of D	0 of D	40,000 of D	40,000 of D

It is given in the scenario that by 2020, Company RUS does not contain the entity that manufactured Chemicals A, B, C, in 2016 and 2017. For CDR purposes, Company RUS is not considered a manufacturer of Chemicals A, B, and C, and Company RUS does not report on what it did not manufacture. Furthermore, Company RUS does not report its production of Chemical E because the manufactured volume of Chemical E was below the reporting threshold in every year that Company RUS manufactured Chemical E. Company RUS reports its manufacture of 40,000 lbs/year of Chemical D in 2018 and 2019 and reports 0 lbs of Chemical D for 2016 and 2017. Company RUS also reports processing and use information along with the additional manufacturing information required for its 2019 production volume of Chemical D.

4. **Company JKL produces a chemical at a site: 25,000 lbs in 2016 and 5,000 lbs in the first quarter of 2017. On April 1, 2017, Company JKL sells the site and the rights to manufacture the chemical to Company MNO; however, Company JKL did not actually transfer to Company MNO the unit of Company JKL that conducted the manufacture of the chemical. Company MNO produces 15,000 lbs of the chemical from April to December 2017, 30,000 lbs in 2018, and 20,000 lbs in 2019. What are the reporting obligations in 2020 for the two companies?**

See the general discussion of when one company acquires a site from another company; two companies continue to exist. (General Scenario 7)

It is given that there has been no actual combination of Company JKL and Company MNO. There has merely been a transfer of real estate and other property from one company to the other.

Company JKL would report the manufacturing that Company JKL did at the site: 25,000 lbs in 2016 and 5,000 lbs in 2017. Company JKL would report 0 lbs for 2018 and 2019, meaning that Company JKL would not report processing and use information or additional manufacturing information for 2019. Company MNO would report the manufacturing that Company MNO did at the site: 0 lbs in 2016, 15,000 lbs in 2017, 30,000 lbs in 2018, and 20,000 lbs in 2019. Company MNO reports processing and use information along with the additional manufacturing information required for its 2019 production volume.

5. **CDE National owns CDE Texas. CDE Texas has a site (“Site A”) which is also its headquarters. Site A is partly owned by CDE Texas and CDE National, who co-manufacture a chemical at that site. At an adjacent Site B, owned by CDE National alone, solely CDE National conducts manufacturing of the same chemical. Do the two sites report together or separately? Who would report on the manufacture at Site A, where co-manufacturing of the chemical occurs?**

See the general discussion of when two companies are co-manufacturers at a site. (General Scenario 2)

It is given that Site A and Site B are two different property units, one owned and operated by CDE National and CDE Texas and the other owned and operated solely by CDE National. CDR reporting is site-specific. See 40 CFR 711.15. Therefore, the manufacturing at Site A needs to be reported separately from the manufacturing at Site B.

CDE National and CDE Texas can determine amongst themselves which one of them will file the report on the manufacturing at Site A. CDE National would file the report on the manufacturing at Site B.

6. **Company ABC manufactured a chemical at Site ABC-1 in amounts above 25,000 lbs every year from 2016-2019. On January 1, 2020, Company ABC will change its name to Company XYZ and the site name to Site XYZ-1. What name should be used for CDR reporting in 2020?**

See the general discussion of company and/or site name changes. (General Scenario 1)

By the beginning of the CDR submission period on June 1, 2020, Company XYZ will be the current name of the business entity that conducted the manufacturing in 2016-2019. Therefore, Company XYZ should report using its current business name (Company XYZ) and current site name (Site XYZ-1).

7. **Company ABC manufactured 1,000 lbs of a chemical at its Alpha Site in 2016. In January 2017, Company ABC manufactured another 1,000 lbs of the chemical at the Alpha Site. In February 2017, Company ABC changed its name to Company QRS, closed the Alpha Site, and started operating at the Beta Site. At the Beta Site, Company QRS manufactured 9,000 lbs/year of the chemical in the remainder of 2017, 10,000 lbs in 2018, and 30,000 lbs in 2019. How should Company ABC report in 2020, assuming that the reporting threshold is 25,000 lbs?**

See the general description of a company closing a facility at a site and company and/or site name changes, (General Scenarios 8 and 1)

CDR reporting is site-specific; therefore, the amount of the chemical needs to be evaluated separately for the two sites.

The names of the company and the site were changed during the reporting period. The current names should be used for reporting.

Because Company QRS did not manufacture 25,000 lbs or more of the chemical at Alpha Site in 2016, 2017, 2018, or 2019, Company QRS does not report the chemical it manufactured at Alpha Site.

Because Company QRS exceeded the reporting threshold at Beta Site in 2019, Company QRS reports the 9,000 lbs of the chemical it made at Beta Site in 2017, the 10,000 lbs it made at Beta Site in 2018, and the 30,000 lbs it made at Beta Site in 2019. Company QRS reports processing and use information along with the additional manufacturing information required for its 2019 production volume.

- 8. Company ABC manufactured 100,000 lbs of a chemical at its Alpha Site in 2016. In January 2017, Company ABC manufactured another 10,000 lbs of the chemical at the Alpha Site. In February 2017, Company ABC changed its name to Company QRS, closed the Alpha Site, and started operating at the Beta Site. At the Beta Site, Company QRS manufactured 90,000 lbs/year of the chemical in the remainder of 2017, 10,000 lbs in 2018, and 5,000 lbs in 2019. How should Company ABC report in 2020, assuming that the reporting threshold is 25,000 lbs?**

See the general description of a company closing a facility at a site at and company and/or site name changes. (General Scenarios 8 and 1)

CDR reporting is site-specific; therefore, the amount of the chemical needs to be evaluated separately for the two sites.

Because Company QRS manufactured more than 25,000 lbs Alpha Site in 2016, Company QRS reports the 100,000 lbs it manufactured at Alpha Site in 2016, the 10,000 lbs it manufactured at Alpha Site in 2017, and reports 0 lbs for 2018 and 2019, meaning that it does not report processing and use information in 2019 or the additional manufacturing information required for the chemical at Alpha Site. Company QRS reports using its current name, not the prior name it was doing business under when operating at Alpha Site.

Company QRS also exceeded the reporting threshold at Beta Site in 2017. Therefore, on a separate form, Company QRS reports 0 lbs for the amount it manufactured at Beta site for 2016, the 90,000 lbs it made at Beta Site in 2017, the 10,000 lbs it made at Beta Site in 2018, and the 5,000 lbs it made at Beta Site in 2019. Company QRS reports processing and use information along with the additional manufacturing information required for its 2019 production volume.

For further information:

To access copies of additional fact sheets and other CDR information, log onto www.epa.gov/cdr.

If you have questions about CDR, you can contact the TSCA Hotline by phone at 202-554-1404 or e-mail your question to eCDRweb@epa.gov.