Are You Ready for the November 30 Chemical Data Reporting Deadline?

These Frequently Asked Questions can help you identify your Chemical Data Reporting (CDR) reporting requirements under the Toxic Substance Control Act

ESIS®

What is Chemical Data Reporting (CDR)?

The Chemical Data Reporting (CDR) rule under the Toxic Substance Control Act (TSCA) requires facilities to electronically report the use, importing and/or manufacture of certain regulated materials to EPA using CDR Form U. The EPA uses this data to monitor chemical use throughout the nation to identify potential exposure risks and threats to public health and the environment.

What types of facilities must comply with this regulation?

Manufacturers and importers are required to file a CDR report if their use, manufacture, or importing of a regulated material exceeds the reporting threshold for that material. In general, the reporting threshold is 25,000 lbs. per site, but there is a lower reporting threshold of 2,500 lbs. for chemical substances that are subject to certain TSCA actions.

Which chemicals are subject to the CDR reporting requirements?

EPA has adopted <u>a list of chemicals that are subject to the CDR reporting requirements.</u> The list indicates the current reporting threshold for each regulated chemical. Note: EPA updates and amends the list of CDR regulated chemicals prior to each reporting cycle.

When must CDR reports be filed?

Facilities that manufacture, process or import regulated materials in excess of the CDR reporting threshold must report the use and management of these materials to the EPA every four years. This year, 2020, is a reporting year. Regulated facilities are required to report a variety of chemical use, handling and disposal data for each of the last four years (2016, 2017, 2018 and 2019) by November 30, 2020.

How Can ESIS Health, Safety and Environmental (HSE) assist with CDR Reporting?

Most facilities are not familiar with this reporting requirement. EPA reports that this reporting requirement is routinely overlooked by facilities audited by EPA. The ESIS HSE team has the knowledge and expertise to help your facility determine if your facility is subject to the CDR reporting requirements, and to help you prepare and submit your quadrennial CDR Form U to EPA.

Contact us today
Annette Sanchez
Senior Vice President, Sales
503.956.4761
annette.sanchez@esis.com

Chubb Global Risk Advisors M is a service of ESIS, Inc., a Chubb company. Chubb Global Risk Advisors Provides claim and risk management services to a wide variety of commercial clients. ESIS' innovative best-in-class approach to program design, integration, and achievement of results aligns with the needs and expectations of our clients' unique risk management needs. With more than 60 years of experience, and offerings in both the U.S. and globally, ESIS provides one of the industry's broadest selections of risk management solutions covering both pre and post-loss services. Chubb is the marketing name used to refer to subsidiaries of Chubb Limited providing insurance and related services. For more information, visit us at www.chubb.com.

Chubb Global Risk Advisors' loss control services are not a substitute for, and do not excuse a client from, fulfilling any legal duty they may have to provide a safe workplace, premises, product or operation. Chubb Global Risk Advisors' loss control services are not intended as a substitute for advice from legal counsel, nor are they intended to supplant any duty to provide a safe workplace, operation, product or premises. Any duty to implement Chubb Global Risk Advisors' recommendations rests with the client not with Chubb Global Risk Advisors.