

The EPA CDR–What is it and does it affect you?

What is CDR?

The Environmental Protection Agency's 2016 Chemical Data Reporting (CDR) rule, under the Toxic Substances Control Act (TSCA), requires manufacturers of chemicals listed specifically on the TSCA inventory to provide EPA with information on the production and use of chemicals in commerce in large quantities. Under the CDR rule, EPA collects basic exposure-related information on the types, quantities and uses of chemical substances produced domestically and imported into the United States. Reporting is carried out through a standardized Form U report submitted electronically through CDX, the Agency's electronic reporting site.

Who is affected?

Specifically, the CDR is required for companies which manufacture or import substances with unique Chemical Abstract Numbers registered to their company. Manufacturers (including importers) are required to report if they meet certain production volume thresholds, generally 25,000 lbs. or more of a chemical substance at any single site. However, a reduced reporting threshold (2,500 lb.) now applies to chemical substances subject to certain TSCA actions.

What do I do?

If your company has materials on the TSCA inventory it has manufactured in the last 4 years (2012, 2013, 2014, 2015) in excess of 25,000 lbs., you will be required to submit a Form U. There are several exemptions that may apply, making your company exempt from this reporting requirement; otherwise, a Form U must be prepared for each reporting cite for each chemical produced. Each Form U entry for each substance must contain production volumes for each of the 4 years of the CDR above 25,000lbs., certain exposure information, and processing and use information.

When do I need to do this?

Reporting starts June 1st 2016 and must be completed by September 30th.