

TSCA Chemical Inventory "Reset" Reporting Deadline: October 5

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Reminder that Friday is the deadline for chemical "processors" to file notifications with EPA to ensure that the chemicals they use are designated as "active" substances on the TSCA Inventory. "Active" designation is important as chemicals that are "inactive" will be treated as new chemicals for which pre-manufacture (or pre-import) notification and safety determination requirements will apply. Many, if not most, chemicals in use in the U.S. likely already have been reported, but if you have not checked the EPA database of chemicals for which notifications already have been received, you should consider doing so now to avoid unanticipated supply disruptions.

EPA intends to issue the first TSCA Inventory with all substances designated as "active" or "inactive" within a few months after the October 5 reporting deadline.

For further information on the TSCA Inventory "reset" effort, please see my prior post below.

https://www.kelleygreenlawblog.com/2018/06/chemical-reset-make-sure-substances-manufacture-import-use-epa-active/