



THE ADMINISTRATIVE WATCH

ADMINISTRATIVE WATCH ADDRESSES ENVIRONMENTAL, HEALTH & SAFETY ISSUES

BCCZ

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HOLIDAY EXTENSION!

The Toxic Substances Control Act (“TSCA”) Inventory Update Reporting Period Ending December 23, 2006 is Extended Until March 23, 2007.

All manufacturers and importers of chemical substances listed on the TSCA Chemical Substance Inventory are required to report certain data every four years (every five years after the 2006 reporting period). *Reports for the calendar year 2005 time period, which were previously due by December 23, 2006, must now be submitted by March 23, 2007.*

The U.S. Environmental Protection Agency (“USEPA”) cited a number of reasons for extending the TSCA Inventory Update Reporting deadline by an additional three (3) months. The reasons included:

- (1) The late issuance of guidance for the August 25 through December 23, 2006 reporting period, which differs greatly from guidance issued for prior reporting periods.
- (2) Inventory update reporting software problems. Although the USEPA strongly encouraged the use of the electronic reporting software, our clients have encountered many problems with loading and/or entering information into the software.
- (3) Complex questions raised by manufacturers and importers of inorganic chemical substances that were not anticipated by the USEPA. You will recall that the prior reporting years’ exclusion for inorganic chemical substances no longer applies.

Records in support of decisions to report or not to report specific chemical substances during the 2006 reporting period must be maintained until June 1, 2011. Failure to comply with the reporting requirements could result in civil penalties of up to \$32,500.00 per day and/or criminal penalties.

For additional information regarding the TSCA inventory requirements, please contact Colleen Grace Donofrio at (856) 686-4608 or cdonofrio@bccz.com or Bob Thomson at (412) 394-5656 or rthomson@bccz.com.

TWO GATEWAY CENTER
PITTSBURGH, PA 15222
412.394.5400
WWW.BCCZ.COM

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