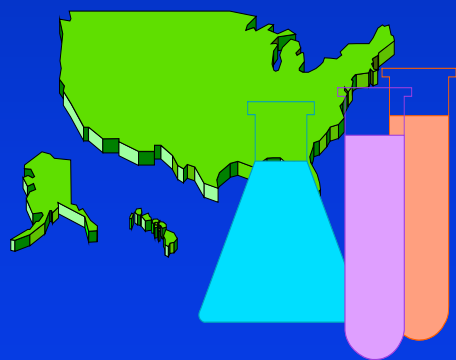


Lessons Learned from 2006 and Anticipated Changes in 2011

GlobalChem Conference

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Discussion Overview

- What is the IUR?
- How has the 2006 Data been Used?
- Experiences with the 2006 Collection
- Current Next Steps
- Schedule



What is the IUR?

The Inventory Update Reporting (IUR) program collects manufacturing, processing, and use information from chemical manufacturers and importers concerning chemicals listed on the TSCA Inventory of Chemical Substances.

The IUR currently provides a “snapshot” of chemical manufacturing every 5 years.



Many Firsts for the 2006 IUR

- Required reporting of enhanced exposure-related information
 - Chemical property information
 - Number of workers likely to be exposed to the chemical
 - Characterization of how the chemical is used in an industrial setting
 - Identification of use in commercial or consumer applications
- Required reporting of inorganic chemical substances
- Enabled secure reporting over the Internet



Public Availability of the IUR Data

- IUR Data Summary Report
- Searchable database with non-confidential chemical records now available
 - Searchable by Chemical or by Company
 - Downloadable
- Historical non-confidential chemical records are available under “Past IUR Data”

Website: www.epa.gov/oppt/iur



Using the 2006 IUR Data

The IUR provides a base set of information that can be used as a starting point for basic exposure information. Uses include:

- A “first look” at a chemical, industry, or use by providing needed information not otherwise available.
- Identify trends and potential issues or concerns.
- Identify where additional information may be needed.

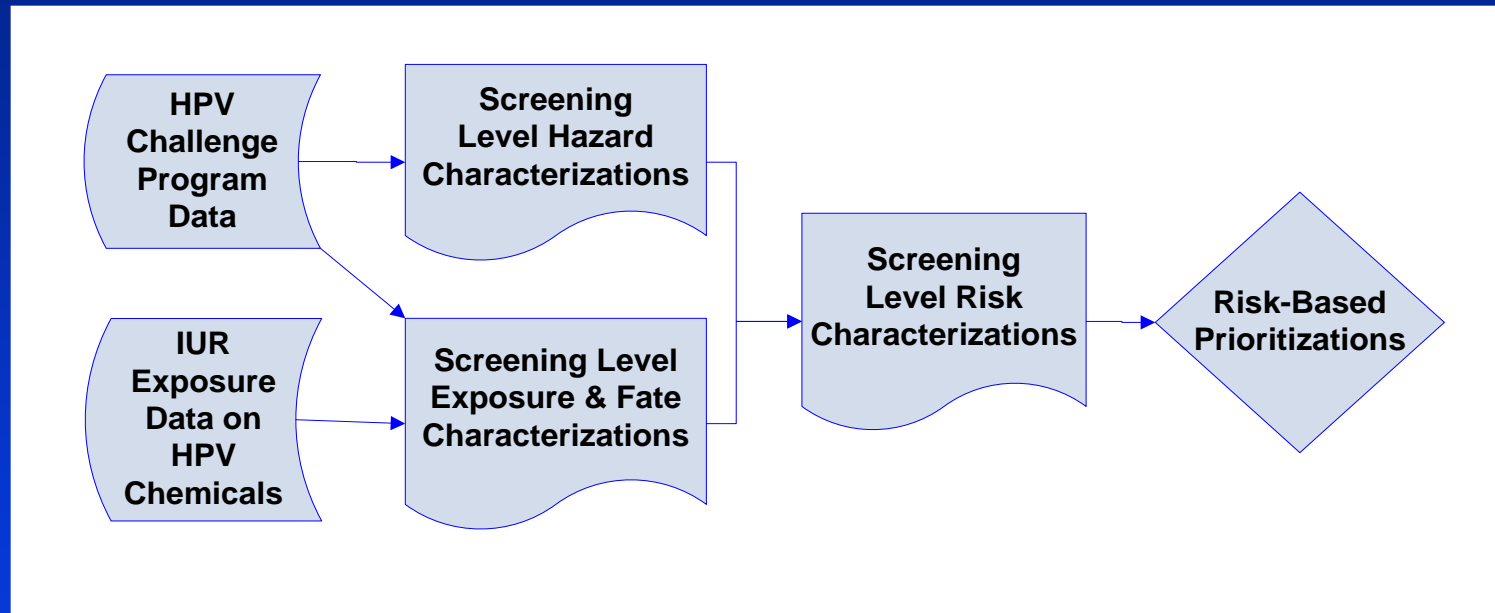


Specific Uses of the 2006 IUR Data

- Chemical Assessment and Management Program (ChAMP)
 - HPV Risk-based Prioritizations (RBPs)
 - » *Most use IUR processing & use data*
 - MPV Hazard-based Prioritizations (HBPs)
 - » *IUR processing & use information is summarized when available*
- Development of Test Rules
- Development of Cooperative Programs, such as Design for the Environment (DfE)
- Rapid Risk Management Responses



EPA's Initial Use of the 2006 IUR Data: The HPV Chemical Risk-Based Prioritization Process

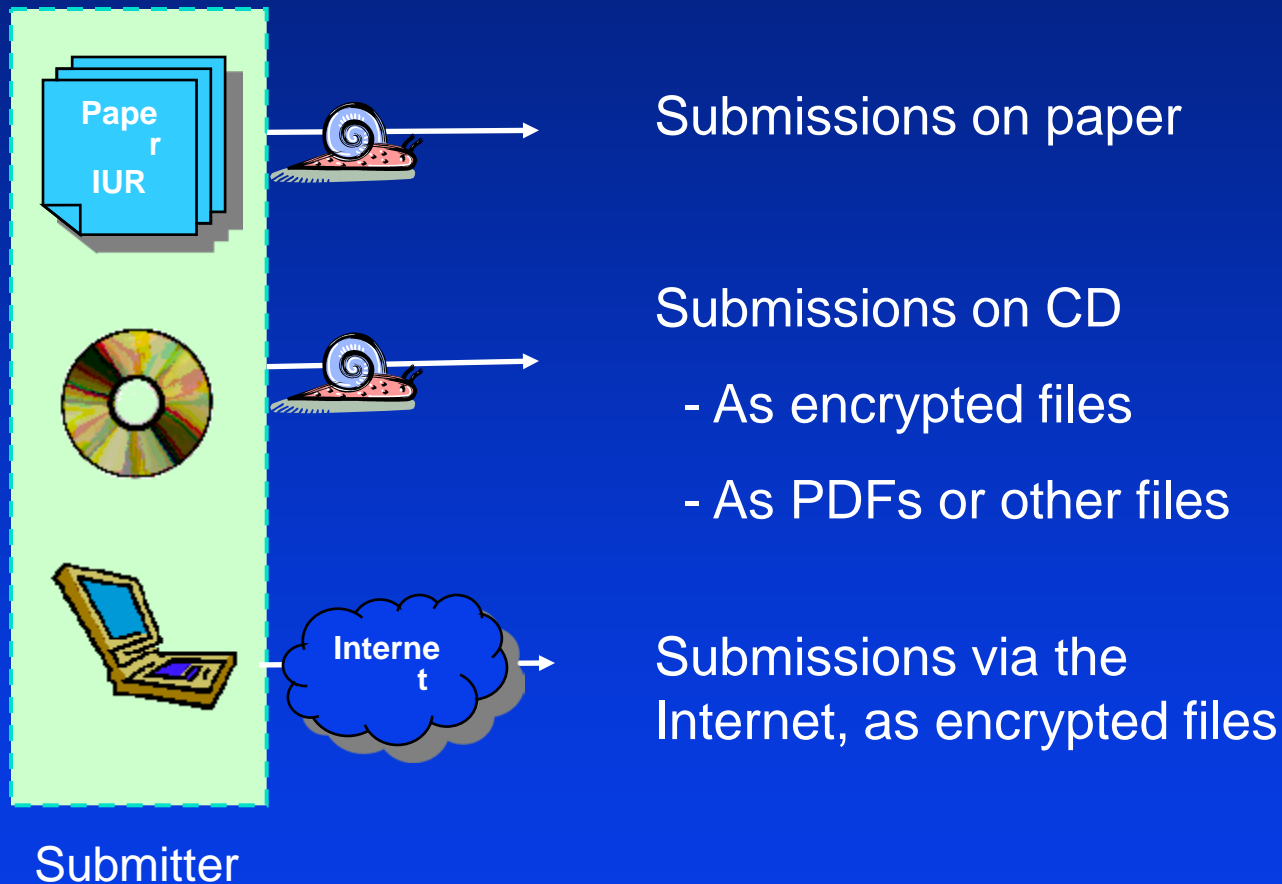


Experiences with the 2006 IUR

- Building the Database
 - Receiving the submissions
 - Data issues
- Using the Data
 - Data issues
- Addressing Future Information Needs



Building the IUR Database



Examples of Issues Affecting the Database

- General problems with submissions
 - Missing data
 - CBI upfront substantiations missing or incomplete
 - Multiple reports for the same chemical and the same site
- Chemical Identifications incorrect
 - Invalid CAS RN and/or chemical name
 - Valid CAS RN and chemical name, but unmatched
 - Wrong substance reported (e.g., hydrate reported)
- Company, Site, and Technical Contact
 - Incomplete and inconsistent provision of company name, location, and D&B numbers
 - Technical contact knowing little to nothing about the chemical



Problems Using the Data

- Confidential business information (CBI) claims
 - Leaves gaps in the information made available to the public, thereby increasing the chance of wrong conclusions
 - Lack of substantiation
- Processing and use-related information
 - Low percentage of production volume covered
 - Excessive use of “Not Readily Obtainable (NRO)”
 - Consumer/Commercial information not separable



Current Next Steps

- Three-pronged approach for 2011
 - Program modifications
 - » Better address information needs
 - » Encourage more thoughtful contemplation of CBI claims
 - Use of electronic reporting
 - » More automated error checking
 - » Rejection of incomplete submissions
 - Education and guidance materials
 - » Additional information for importer and byproduct manufacturers
 - » Web-based training



Improvements Needed

- Data collected through the IUR needs to be focused on what is needed to meet Agency priorities and others' needs
 - Reviewing adequacy of data to meet needs
 - Considering program modifications
 - Identifying other methods to improve the quality and availability of the data



Improvements Needed

- Industry needs to provide the required information, and that information needs to be correct
 - Updating guidance materials based on inquiries during the 2006 submission period
 - Incorporating reporting aids into the eIUR software and making the schema available
 - Considering regulatory changes to help ensure completeness and correctness of submissions



Improvements Needed

- EPA needs to make the data available in a timely manner, and the data needs to accurately reflect the reporting information
 - Improving submission receipt process, including strengthening focus on electronic reporting
 - Improving validation and error checking of data as it is received



Current 2011 IUR Schedule

Summer 2009	IUR Modifications Proposed Rule
Winter 2010	IUR Modifications Final Rule
Early 2011	eIUR Reporting Software and Guidance Available
June 1 – September 30, 2011	Submission Period

