

# The Toxic Substances Control Act: Fundamentals and More

April 19-20, 2016

April 19, 2016 Course Topics – Day 1 of 2

8:00 a.m. **Registration; Continental Breakfast**

8:30 a.m. **Introduction to TSCA**

*Stanley W. Landfair, Dentons US LLP*

- Goals of TSCA
- Scope of TSCA (chemical substances, mixtures, articles)
- Key TSCA terms
- Activities subject to TSCA (manufacturing, processing, use, distribution, disposal)

9:00 a.m. **The TSCA Inventory**

*Saadia Eltayeb, Ph.D., Technology Sciences Group Inc.*

- Development of the TSCA Initial Inventory
- Inventory nomenclature
- Inventory corrections
- Structure of the Inventory
- Bona Fide Intent to Manufacture Notices

10:00 a.m. **Break**

10:15 a.m. **Premanufacture Notices: the Critical Requirement for Importers and Manufacturers**

*Stanley W. Landfair, Dentons US LLP*

- Exclusions and exemptions

11:15 a.m. **Preparing a Premanufacture Notice and Seeing It through EPA's Review Process**

*Will Pettit, Technology Sciences Group Inc.*

12:15 p.m. **Lunch**

*Greg Sullivan, Acting Director, Waste and Chemical Enforcement Division, Office of Civil Enforcement, U.S. Environmental Protection Agency*

1:15 p.m. **EPA's Regulation of New Chemicals and New Uses**

*Michael Boucher, Dentons US LLP*

- Section 5(e) consent orders
- Significant New Use Rules
- Regulation of nanoscale materials under TSCA

2:15 p.m. **Import and Export Requirements under TSCA**

*Amy Symonds, Dentons US LLP*

- Section 13 import certifications
- Section 12(b) export notices

3:00 p.m. **Break**

3:15 p.m.	<b>EPA's Preliminary Assessment Information Rules and Section 8(d) Reporting Requirements for Health and Safety Studies</b> <i>Michael Boucher, Dentons US LLP</i>
3:45 p.m.	<b>Testing under TSCA</b> <i>Michael Boucher, Dentons US LLP</i> <ul style="list-style-type: none"> <li>• Selection of chemicals for consideration</li> <li>• Section 4's test rule authority</li> <li>• Voluntary testing programs</li> </ul>
4:15 p.m.	<b>Managing for Corporate TSCA Compliance</b> <i>Eileen Salathe, Lead Counsel -- Regulatory and EH&amp;S, Dow AgroSciences</i>
5:00 p.m.	<b>Cocktail Reception</b>
April 20, 2016	Course Topics – Day 2 of 2
8:00 a.m.	<b>Continental Breakfast</b>
8:30 a.m.	<b>Status of Congress's Effort to Modernize TSCA</b> <i>Benjamin E. Dunham, Dentons US LLP</i>
9:30 a.m.	<b>Section 8(c) Recordkeeping for Reports of "Significant Adverse Reactions" and Section 8(e) Reporting of "Substantial Risk" Information</b> <i>Stanley W. Landfair, Dentons US LLP</i>
10:30 a.m.	<b>Break</b>
10:45 a.m.	<b>EPA's Chemical Data Reporting Rule</b> <i>Will Pettit, Technology Sciences Group Inc.</i> <ul style="list-style-type: none"> <li>• Reporting for the 2016 reporting period</li> </ul>
11:45 a.m.	<b>Lunch</b>
12:30 p.m.	<b>Existing Chemicals Under TSCA</b> <i>Michael Boucher, Dentons US LLP</i> <ul style="list-style-type: none"> <li>• EPA's authority under and use of section 6</li> <li>• TSCA Work Plan Chemicals</li> </ul>
1:15 p.m.	<b>Protecting Confidential Information Submitted to EPA under TSCA</b> <i>Amy Symonds, Dentons US LLP</i>
1:45 p.m.	<b>Preparing for TSCA Inspections and Limiting Liability for Violations</b> <i>Stanley W. Landfair, Dentons US LLP</i> <ul style="list-style-type: none"> <li>• What to expect when you are inspected by EPA</li> <li>• Effective use of EPA's Self-Policing Policy ("Audit Policy")</li> </ul>
2:30 p.m.	<b>Conclusion</b>