

The Toxic Substances Control Act: Fundamentals and More

April 19-20, 2016



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