

## Toxic Substance Control Act (TSCA) Services

*Get the specialized expertise and support you need from our team of trusted experts*

### **Overview**

3E Company provides support for the complex and time-consuming tasks associated with regulatory compliance for the Toxic Substances Control Act (TSCA). Outsourcing this process to a team of experienced regulatory professionals that is actively involved and engaged in these activities on a daily basis can be a highly efficient and effective way to address the challenges associated with ensuring compliance with chemical control laws.

TSCA services can be performed as either a defined project or on a scheduled, on-going basis and range from fully outsourcing TSCA compliance to project-based, function-specific areas.

### **Support you need, when you need it**

3E's team of professionals can perform the following:

**Regulatory Tracking** - Monitor EPA activity, federal register notices, final rules, enforcement activities to review and direct compliance measures

**Spearhead TSCA Compliance** - Interface with the client's management team, regulatory personnel and others to direct TSCA Compliance program

**TSCA Section 5** - New Chemical Substance Compliance Support, Premanufacture Notice (PMN) requirements (Low volume exemption (LVE)), Notice of Commencement (NOCs), bona fide letters

- Consulting with client
- Consulting with EPA
- Review of test data and other documents
- Collaboration with customer chemists and regulatory personnel, industrial hygiene and other professionals
- Completion of Form 7710-25
- Proof of submission
- Duplication of supporting documents
- Sanitization of PMN
- Submission of Notification
- Fee Filing (3E will advise on process)
- Notice of commencement

### **Levels of Service**

**TSCA Coordinator** – Let our experts help you with your project based needs such as inventory reviews, new substance registration, exemptions and reporting requirements

**TSCA Consultant** – If you need more hands-on assistance our TSCA Consultants can manage your day to day compliance program including reports, submissions, record keeping, reviews, regulatory tracking

**Auxiliary TSCA Services** - Our TSCA professionals can assist with SOP development, training, audit readiness, audit hosting and record keeping



**Significant New Use Rules (SNUR)**

Notify EPA 90 days before activity

**Significant New Use Notice (SNUN)**

**Inventory Update Rule Support (IUR)**

Review inventory update report requirements including result from most recent amendment  
Review current mechanisms for tracking volumes and other required information of imported and manufactured products and materials at substance level  
If required information is not currently tracked, recommendations will be made on the best way to do so  
Complete report for signature and submission

**TSCA 8b Status Reviews and Certifications**

**TSCA 8c and 8e Review and Submission**

**Import Certifications - TSCA Stamp and FIFRA Notice of Arrival of Pesticides**

Review incoming shipments for TSCA Import Status  
Provide proper TSCA Import Certification paperwork for all shipments coming into US from overseas  
If necessary, file FIFRA Notice of Arrival of Pesticides forms with EPA

**TSCA 12(b) Export Notification Support**

Review raw materials and mixtures for presence of substances subject to TSCA 12(b)  
File any necessary Export Notifications with EPA

**Exemptions Assessments and Certifications: R&D, Polymer, LoRex**

**CAS RN Number Application**

CAS Inventory Expert Services Purchase Order  
Complete required documentation

**Global Inventory Status of New Ingredients and Finished Goods**

**Training**

TSCA Compliance Awareness (8c included)  
R&D Exemption Compliance Support  
Inventory Update Reporting  
Global Inventory Status of New Ingredients  
Export Notification  
Import Certifications  
FIFRA Notice of Arrival of Pesticides

**Locations**

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