

FACTORS TO CONSIDER WHEN USING THE DATABASE

The 2012 Chemical Data Reporting (CDR) database provides the public, government officials, non-governmental organizations, and industry access to non-confidential information on the manufacture, import, processing, and use of chemicals in commerce at national and regional levels. This fact sheet highlights important factors to consider when working with the 2012 CDR database.

Reporting Thresholds

CDR reporting is triggered by the amount of a chemical manufactured (including imported), rather than the hazard or potential exposures associated with a chemical. Understanding reporting thresholds of manufactured (including imported) chemicals that trigger reporting is important when using and interpreting the 2012 CDR data.

- Determination of the need to report in 2012 was based on whether 2011 site-specific production volume met or exceeded 25,000 pounds.
- For all reportable chemicals, manufacturers (including importers) were required to report in 2012 full manufacturing data for calendar year 2011 and production volume only for calendar year 2010.
- The reporting threshold in 2012 was 100,000 pounds or greater for manufacturers (including importers) to report processing and use information.

Due to these reporting thresholds, totals of CDR production volumes reported for 2012 may underestimate the actual total amount manufactured and imported in the United States, particularly if there are a substantial number of sites that manufacture (including import) the chemical in quantities less than 25,000 pounds per year. When comparing changes in production over time at the site, particularly on the regional or national levels, it is important to take into account changes in the reporting thresholds across the years of available data.

Confidential Business Information

The 2012 CDR public database provides non-confidential information on the manufacturing, processing, and use of chemicals in commerce in the United States. It is important for users of the CDR public database to understand what data submitters can claim as confidential business information (CBI), and the way in which the public database has been aggregated and masked to protect CBI.

The CDR data described in this factsheet is a sub-set of the complete CDR data because confidential business information is not included. The figures presented herein may be an underestimate.

Using CDR to Screen Chemicals

The CDR data provides information on chemical manufacturing, processing, and use. To determine potential exposures and risks to human health and the environment, EPA combines CDR data with information on:

- Toxicity of the chemical
- Potential releases
- Site-specific conditions

CHEMICAL DATA REPORTING



Submitters may designate individual CDR data elements as CBI when they report information. However, chemical identity may only be claimed confidential if the chemical is listed on the confidential portion of the TSCA Inventory. Processing and use data elements can be claimed as CBI if a manufacturer (including importer) believes that the release of information will reveal trade secrets or confidential commercial or financial information. Submitters are required to provide upfront substantiations of confidentiality claims for chemical identity, site identification, and processing and use information by answering a series of questions in the reporting form. A blank response or a response that is designated as “not known or reasonably ascertainable” may not be claimed as confidential.

Production volume may also be designated as CBI. If all the production volumes of a chemical are not claimed as CBI, the public CDR database will include specific values for individual and aggregated production volumes for that chemical. However, if most or all of the production volumes reported for a given chemical substance are claimed as CBI, the individual CBI production volumes are not reported and aggregated production volumes are reported as ranges to protect the CBI claims.

In preparing the CDR public database, EPA takes care to avoid release of CBI while also publishing as much information as possible. Users examining individual records will notice CBI protected entries in particular data fields. When using aggregated CDR data, users should recognize that they do not have access to the complete set of data.



Chemicals Exempt from Reporting

Manufacturers (including importers) may not be required to report information on certain chemicals to CDR because of the type of chemical or because of the manner of manufacture (including import) or use of the chemical.

- Chemicals manufactured (including imported) for non-TSCA uses are not required to be reported (e.g., pesticides are exempt from regulation by TSCA). If a portion of a manufacturer’s (including importer’s) production is *not* subject to TSCA (for example, if the use is regulated by the Food and Drug Administration), then the production associated with the non-TSCA second use will *not* be reported to CDR. Note that manufacturers may report downstream non-TSCA uses for their chemical.
- Generally, water and naturally occurring substances are exempt from CDR requirements. Three other groups of chemicals (polymers, microorganisms, and certain forms of natural gas) are also generally exempt from CDR requirements. It is important to note that a particular polymer, microorganism, or form of natural gas may not be exempt if the chemical becomes the subject of certain TSCA actions, such as an Enforceable Consent Agreement.

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- Chemicals that are non-isolated intermediates, imported as part of an article, impurities, or byproducts destined for certain commercial uses are exempt from reporting.

Manufacturers Exempt from Reporting

Small manufacturers (including importers) who meet one of the following requirements are generally exempt from CDR requirements if:

- Total sales during 2011 combined with those of the parent company, domestic or foreign (if any), are less than \$4 million; or
- Total sales during 2011 of the parent company, domestic or foreign (if any), are less than \$40 million and annual production volume of a qualifying chemical substance does not exceed 100,000 pounds at any individual plant site. If the annual production volume of the chemical substance at any particular site is more than 100,000 pounds, the manufacturer is required to report for that particular site.

Reporting in Ranges

The following data elements are reported as ranges to reduce the industry reporting burden:

Manufacturing Information:

- Number of workers reasonably likely to be exposed to chemical
- Maximum concentration of chemical

Processing and Use Information:

- Percent production volume for each product category
- Maximum concentration for each product category
- Number of commercial workers reasonably likely to be exposed to chemical

Processing and Use Information

Often the processing and use of chemicals is not under the control of the manufacturers (including importers); therefore they might have incomplete knowledge of these activities. Manufacturers (including importers) were required to report processing and use information that was known to or reasonably ascertainable by them. They were not required to collect information from their customers about end uses. Also, CDR submitters were not required to report the quantities exported. As a result of these factors, the processing and use information in the CDR public database presents only a limited picture of the actual processing and use situation in the United States.

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