CTC-030 TSCA Compliance

Compliance Verification Date: 9-04-2021

Overview

The Toxic Substances Control Act of 1976 (TSCA) manages the use of chemicals in domestic commerce for their total lifecycle, from initial substance manufacture or importation to final disposal. It provides the Environmental Protection Agency (EPA) the authority to require reporting, documentation, and testing of chemical substances. The agency may also restrict substances and substance families.

Since 1976, the EPA has used TSCA to restrict the use of chemical substances. Examples include lead in paint, metallic mercury in consumer products, and chlorofluorocarbon (CFC) refrigerant gases. In 2016, Congress updated TSCA as the Frank R. Lautenberg Chemical Safety for the 21st Century Act and gave the EPA a clear mandate to strengthen and reinforce this regulation. The revised act requires the agency to conduct risk evaluations of "high-risk substances." On January 6, 2021, the EPA published the first set of post-Lautenberg final rules under Section 6 of TSCA. The rules restrict five persistent, bioaccumulative, and toxic (PBT) substances in "treated articles" currently used in both consumer and industrial products across many industry verticals and carry aggressive timelines for compliance.

The rules published in January 2021 created new obligations for companies operating, importing, or selling into the U.S. and using any of the following five substances/substance families in U.S. commerce as listed in Table I below:

Compliance

All InterFET facilities, operations, packaged and unpackaged end products meet the requirements of the Frank R. Lautenberg Chemical Safety for the 21st Century Act. On September 4, 2021 the PIP 3:1 enforcement delay expires. On January 6, 2022 the rules come into effect for distributors.

Table I: TSCA Substances

Index	Chemical Name	CAS Number	Metal Case	Plastic Parts
1	Phenol, isopropylated phosphate (3:1) (PIP (3:1)	68937-41-7	ND(1)	ND(1)
2	Decabromodiphenyl ether (DecaBDE)	1163-19-5	ND(1)	ND(1)
3	2,4,6-tris(tert-butyl)phenol (2,4,6 TTBP)	732-26-3	ND(1)	ND(1)
4	Hexachlorobutadiene (HCBD)	87-68-3	ND(1)	ND(1)
5	Pentachlorothiophenol (PCTP)	133-49-3	ND(1)	ND(1)

1. ND: Not Detected. Material not used or not detected to the Measured Device Limits (MDL) of the test equipment. Trace quantities of listed material may be present due to process requirements but are below the reporting threshold.
2. UMBL: Used Material Below Limit. This material is used in the manufacturing of the specified product but is below the required limit of 0.1% (1000ppm).

Disclaimer: It is the Buyers responsibility for designing, validating and testing the end application under all field use cases and extreme use conditions. Guaranteeing the application meets required standards, regulatory compliance, and all safety and security requirements is the responsibility of the Buyer. These resources are subject to change without notice.