

Using the 2006 Inventory Update Reporting (IUR) Public Data: Background Document

This document provides information helpful to understanding and using the data in the 2006 Inventory Update Reporting (IUR) public database, available on the IUR website (www.epa.gov/iur). The December 2008 release of the IUR public database is based on version 1.1 of the 2006 IUR database and excludes approximately 5% of the number of chemicals submitted due to significant problems with the chemical identifications. For a summary of the 2006 IUR collection requirements, please read [Overview of TSCA Inventory Update Reporting \(2006\)](#).

What is the IUR public database?

The 2006 IUR public database is a collection of non-confidential information on 6,200 chemicals domestically manufactured in or imported¹ into the United States, and includes processing and use information on more than 3,000 of those chemical substances. EPA developed the public database from an internal database comprised of the 2006 IUR raw information. In order to provide the public with the most comprehensive data, EPA has provided much of the information as aggregated, national numbers in ranges. This allows the public to view information based on both the confidential and non-confidential data.

What Should I Consider When Using the IUR Data?

IUR reporting is triggered by the volume of the chemical substance manufactured, rather than the actual hazards or potential exposures associated with a chemical substance. While the public database provides the public, government officials, non-governmental organizations, and industry with access to non-confidential information on the manufacture, processing, and use of chemical substances in commerce, this limitation in the public database needs to be recognized. In addition, while the IUR provides comprehensive reporting from all subject companies, the required data are limited and were intended to be used only for screening-level purposes. For this reason, the use of the IUR data is only sufficient to characterize potential exposures and should not be used to calculate potential risks to human health and the environment, even at a screening level. IUR data, in conjunction with other information, such as the toxicity of the chemical, potential releases, and site-specific conditions, can be used as a starting point in prioritizing and screening chemicals for potential risks to humans and the environment.

When interpreting this data, what factors do I need to consider? What are the data limitations?

When using and interpreting IUR data, it is important to keep in mind that users do not have access to the complete IUR data set and should take care in drawing conclusions from the data. Factors to consider include:

¹ For purposes of IUR, the term “manufacture” means “manufacture including import.” The term “domestically manufacture” means manufacturing in the U.S. and does not include import.

Confidential Business Information (CBI)² Claims – IUR data can be designated as CBI by the submitter of the data. EPA has protected confidential information when aggregating IUR data for public use. The 2006 IUR public database presents only data that were either not claimed CBI or that have been aggregated to protect confidential information.

Reporting Thresholds and Exemptions – An understanding of IUR reporting thresholds, the TSCA definition of a chemical substance, and the various IUR exemptions are important when using and interpreting the IUR data.

Reporting threshold: The 2006 IUR includes information about chemical substances listed on the TSCA Inventory and manufactured or imported in quantities of 25,000 pounds or more, at a single site, during calendar year 2005. Aggregated production volume information may not reflect the total volume if there were a substantial number of sites that manufacture or import the chemicals at quantities less than 25,000 pounds per year. Note that for prior reporting cycles (2002 and earlier), the reporting threshold was 10,000 pounds; comparisons of production for a particular chemical over time may be affected by the change in the reporting threshold.

Production volume: Chemical substances may have both TSCA and non-TSCA uses. The volumes associated with the uses of a chemical regulated by other regulatory agencies such as the Food and Drug Administration (FDA) need not be reported under IUR; therefore, a chemical may have a higher overall production volume than was reported under the IUR. The volumes reported in response to the IUR should reflect only the volumes that meet the TSCA definition of a chemical substance.

Chemicals excluded from reporting: Under the IUR, manufacturers are not required to report information on certain chemical substances either because of the type of chemical substance or because of the manner of manufacture or use of the chemical substance. These are in addition to those substances not considered to be chemical substances under TSCA. In general, manufacturers are not required to report IUR information for polymers, microorganisms, naturally occurring chemical substances, and certain natural gas streams. Chemical substances that are non-isolated intermediates, imported as part of an article, or are impurities are exempt from IUR reporting. Byproducts not used for a separate commercial purpose are also exempt from reporting. Note that many byproducts that are recycled for a commercial purpose are reportable under IUR.

Manufacturers excluded from reporting: Small manufacturers are fully exempt from IUR requirements if total annual sales are less than \$4 million or if total annual sales are less than \$40 million and production volume is less than 100,000 pounds.

² Confidential Business Information (CBI), in the IUR context, is commercial information obtained from the information owner, or person, and claimed as confidential (treated as confidential by that person) has not been previously disclosed, is not available from other sources and is not required by law to be disclosed. Additionally the person asserting the CBI claim must believe that the release of the information claimed as CBI would cause substantial injury to the person's competitive position. For further information see the IUR website (www.epa.gov/iur).

Processing and use reporting exclusions: The IUR collected processing and use information for organic chemical substances manufactured in quantities of 300,000 pounds or more for the 2006 IUR. Reporting information on processing and use was not required for all chemicals reported in 2006. See *Overview of TSCA Inventory Update Reporting (2006)* for more specific information.

Reporting in ranges – Many IUR data elements, including number of workers reasonably likely to be exposed to a chemical substance, number of processing and use sites, and maximum concentration, are reported in ranges. Reporting in ranges provides an overview of a given chemical industry while reducing the industry burden associated with developing a precise number for these data elements. In addition, the use of ranges reflects the level of detail available to the chemical manufacturers or importers when providing information about the processing or use that may be beyond their direct control.

Processing and Use Information may have been not readily obtainable (NRO) by the manufacturer or importer-- Often IUR submitters, who are the manufacturers of the reported chemicals, may not have control or may have incomplete knowledge of the data on the processing and use of their chemicals. Therefore, submitters were required to report the processing and use information to the extent that it was readily obtainable to their company, and were able to enter “NRO” for any processing or use data element for which the information was not readily obtainable. Additionally, submitters were not required to report processing and use information on the volumes that were exported.

What data elements are in the public database?

The public database is searchable by chemical name, CAS Registry Number, or company name. The resulting search will provide chemical-specific nationally aggregated information on manufacturing, processing, and use of the chemical substance and company-specific non-confidential site and chemical information.

Table 1 provides a summary of the publicly-available data, including how EPA handled CBI data and what ranges were used for the aggregated data.

Table 1: Summary of 2006 IUR Publicly Available Data Elements

Public Data Element	Treatment of Data Claimed CBI by IUR Submitter	Description
Manufacturing Data		
Chemical Name	Non-CBI only	Chemical Abstracts (CA) name
CAS Registry Number	Non-CBI only	N/A
Production volume	Aggregated manufacturing and import production volume for all submitters (CBI and non-CBI)	Provided in ranges: <500,000 lbs. 500,000 to <1 mil lbs. 1 mil to <10 mil lbs. 10 mil to <50 mil lbs. 50 mil to <100 mil lbs. 100 mil to <500 mil lbs. 500 mil to <1 billion lbs. 1 billion lbs. or greater
Maximum non-confidential concentration (at manufacture or import site)	Non-CBI only	Provided in ranges, as reported **
Physical form(s)	Non-CBI only	Provided as reported **
Number of manufacturing, processing, and use sites*	Aggregated (CBI and non-CBI)	Provided in ranges: 1 to 99 sites 100 to 999 sites 1000 sites or greater
Industrial Processing And Use Data		
Was industrial processing or use information reported?	CBI not applicable	Yes or No
Number of reasonably likely to be exposed industrial, processing, and use workers (aggregated national)	Aggregated (CBI and non-CBI)	Provided in ranges: 1 to 99 workers 100 to 999 workers 1,000 workers or greater
Unique combinations of : Type of process of use Industrial sector Industrial function	Non-CBI combinations of these three data elements only	**
Commercial And Consumer Use Data		
Was commercial or consumer use information reported?	CBI not applicable	Yes or No
Commercial/consumer product category	Non-CBI only	**
Maximum non-confidential concentration in related consumer/commercial product category	Non-CBI only	Provided in ranges, as reported **
Is chemical substance intended for use in children's products in related product category?	Non-CBI only	Yes, No, CBI or NRO

* Note that the information on the number of use sites varies substantially depending upon whether processing and use information was reported for the chemical.

** See *Overview of TSCA Inventory Update Reporting (2006)* for more specific information.