

ICR Attachment 3

IUR ICR Calculations Calculation of Number of Reports For IUR Reporting

Based on 2006 IUR Reporting (October 2007)

a. <u>Total # Form U's</u>	4,190	
b. <u>Total # Reports</u> ¹	28,398	
c. # Reports with volume < 300K lbs. ¹	10,611	
d. # Reports with volume >= 300K lbs. ¹	17,787	
<u>Full Reports</u>		
e. # Reports with Processing or Use data	9,310	(# full rpts)
f. # Reports with Processing or Use data but <300 K lb	959	(full rpts but under 300K lb.threshold)
g. #Reports with Processing or Use data >= 300K	8,351	
<u>Inorganic Chemicals</u>		
h. Total Reports	6,513	
i. Reports <300K lbs.	1,834	
j. Reports >=300K lbs.	4,679	
<u># Discrete Chemicals</u>	7,641	

Because inorganic chemicals are no longer partially exempt, only those chemicals with volumes <300K lbs and partially exempt listed chemicals (e.g., petroleum process streams) do not report processing and use information OR complete a partial Form U.

Calculation for Estimated Number of Full and Partial Reports

Approach 1. Determine the number of estimated reports for listed chemicals using est. number of full reports expected (based on volume) and subtracting the number of full reports received. The number of remaining reports are those that meet the volume threshold but did not complete full form. They are then partitioned into reports on inorganics and others, where others are expected to be due to listed chemicals.

¹ Report refers to an individual chemical-site combination. Companies generally submit one Form U per site, addressing multiple chemicals, and therefore, multiple chemical "reports" per site.

A. Calculate reports for listed chemicals that will be partially exempt.

1a. Total reports \geq 300K (d)	17,787	(expected full rpt)
Total number of full reports (e)	<u>- 9,310</u>	(full reports received)
Est. # Reports \geq 300 K w/partial reports submitted	8,477	
2. Remove inorganics \geq 300K lbs		
Est. # reports attributable to '06 partially exempt chemicals (inorganics and partially exempt listed chemicals)	8,477	
# inorganic reports \geq 300K (j)	<u>- 4,679</u>	(# inorganic Reports \geq 300K)
Est. Partial Reports due to listed chemicals only	3,798	

B. Estimated Numbers of Full Reports

1. Calculate number of reports \geq 300k minus Reports from partially exempt chemicals	17,787	(# reports \geq 300K)
	<u>- 3,798</u>	(# reports from partially exempt chems \geq 300K)
	13,989	(Est. # full reports)

C. Estimated Number of Partial Reports

	10,611	(# reports $<$ 300K)
	<u>+ 3,798</u>	
	14,409	