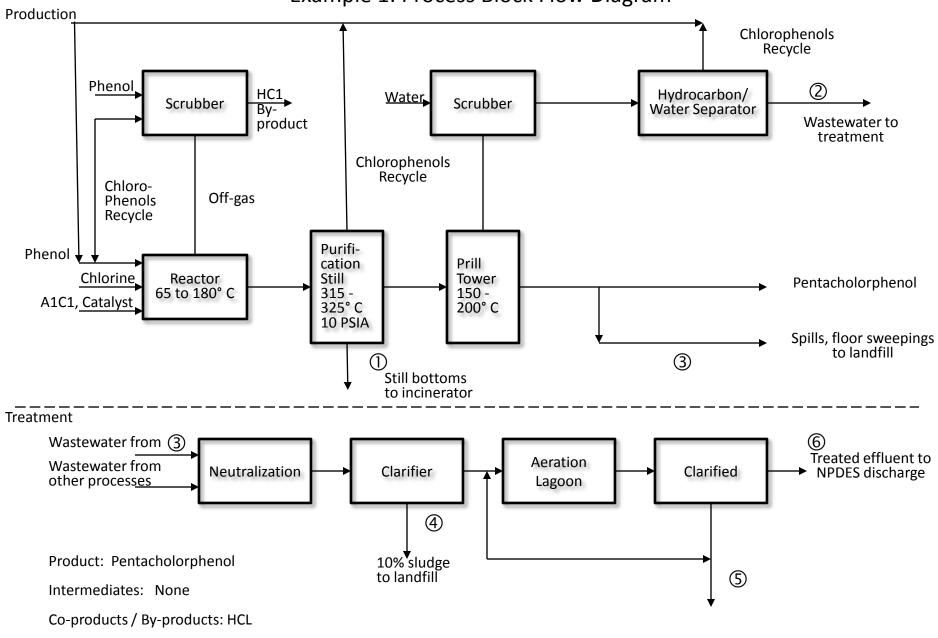
United States Environmental Protection Agency Washington, DC 20460

ŞEP	A Dioxins / Furans	Report	Form appr OMB No. 201			
When complete	ed send this form to:	For Agency Use Only				
Office of U.S. En 1201 Pe	ent Control Officer of Pollution Prevention and Toxics, 7407M vironmental Protection Agency ennsylvania Avenue N.W. gton, DC 20460	Document Control Number	Docket Nu	mber		
	Part I - General Infor	mation				
Section A - S	ubmitter Identification	manon		l		
		antidontial		Confi- dential		
1a. Person	Confidential" box next to any subsection you claim as c Name of authorized official	Title		1		
Submitting	Traine of dution250 official	Thio				
Notice	Company					
	Mailing address (number and street)					
	City, State, and ZIP code					
Section B - C	hemical Identity Information (Use a separate form f	or each chemical reported)				
Mark (X) the "C	Confidential" box next to any subsection you claim as c	onfidential				
1. Chemical na	me and CAS Registry Number					
	Part II - Process and Releas	so Information				
Section A - FI		se illiorillation				
	Confidential" box next to any subsection you claim as c	onfidential				
` '	· · · · · · · · · · · · · · · · · · ·		entifies major	1		
Complete this section for each unit process. Provide a general process block flow diagram that identifies major unit operations and treatment processes and indicate the types and points of release of byproducts and residuals. (See example 1 attached.) (1) Include intermediates, co-products and byproducts produced by the process. (2) Provide a block for each major unit operation (e.g., reactor, washer, filtration, air emission control, aeration lagoon, etc.) in the production process and in the residuals management process. (3) Identify process input such as raw materials, reagents, and solvents by chemical or common name and CAS number, and indicate the point of introduction with arrows. (4) For each unit operation in which the temperature is not ambient, specify temperature or temperature range in each block of the flow diagram. (5) Specify operating pressure or pressure range in each block of the flow diagram for each unit operation in which the pressure is not atmospheric. (6) Identify the composition of the reaction vessel wherever one is used (e.g., stainless steel, glass-lined) (7) Number all points in the flow diagram from which the chemical substance will be released into the environment. (See example 1.)						

Example 1: Process Block Flow Diagram



Section B - Environmental Release and Disposal

You must make separate confidentiality claims for the release number and the amount of the substance released and other release and disposal information. Mark (x) in the "Confidential" box next to each item you claim as confidential.

- (1) Enter the number of each release point identified in the process description, Part II, Section A.
- (2) Estimate the amount of the chemical substance released directly to the environment or into control technology (in kg/day or kg/batch).
- (3) Mark (x) this column if entries in columns (1) and/or (2) are confidential.
- (4) Identify the media (air, land or water) to which the substances will be released from the release point.
- (5) Describe the control technology, if any, that will be used to limit the release of the substance to the environment. For releases disposed of on land, characterize the disposal method.
- (6) Mark (x) this column if entries in columns (4) and/or (5) are confidential.
- (7) Identify the destination(s) of releases to water.

Release number (1)	Amount of substan released (2)	ce Confidential	Media of release (4)	C	ontrol technology (5)		Confidential
	x) the destination(s) ases to water	POTW (Public		Navigable water	Other (Specify)	☐ Mark (:	attach a

Part III - Production, Import, and Use Information											
Mark (X) the "Confidential" box next to any item you claim as confidential											
1. Production volume - Report the production volume during the past 12 months of production. Also report the Confi-											
maximum production volume for any consecutive 12-month period during the past 3 years of production. Past 12-month production (kg/year) Maximum 12-month production (kg/year)									dential		
Past 12-month production (kg/year) Maximum 12-month production (kg/year)											
2. Use information -	You must	make separa	ate confid	entiality cl	laims	for the c	descriptio	n of the c	ategory o	f use, the	percent
2. Use information - You must make separate confidentiality claims for the description of the category of use, the percent of production volume devoted to each category, the formulation of the substance, and other use information. Mark (x) the "Confidential" box next to any item you claim as confidential.										k (x) the	
 (1) Describe each category of use of the chemical substance by function and application. (2) Mark (x) this column if entry in column (3) is confidential. (3) Estimate the percent of total production for the past 3 years is devoted to each category of use. (4) Mark (x) this column if entry in column (3) is confidential. (5) Estimate the percent of the substance as formulated in mixtures, suspensions, emulsions, solutions, or gels as manufactured for commercial purposes at sites under your control associated with each category of use. (6) Mark (x) this column if entry in column (5) is confidential. (7) Mark (x) whether the use is site-limited, industrial, commercial or consumer. Mark more than one column if appropriate. (8) Mark (x) this column if entries in column (7) are confidential. 											
Read the Instructions	s for exam	ples.	T	T			1				1
Category of use	Confi- dential	dential (percent) dential (percent) den			-	n Confi- dential	Mari		oriate colun 7)	nn(s)	Confidential
(1)	(2)		(6)	Site- limited	Indus- trial	Com- mercial	Con- sumer	(8)			
☐ Mark (x) this box if you attach a continuation sheet											
3. Hazard Information - Include in the notice a copy or reasonable facsimile of any hazard warning statement, label, material safety data sheet, or other information that will be provided to any person regarding protective equipment or practices for the safe handling, transport, use, or disposal of the new chemical substances. List in Part IV any hazard information you include. Mark (x) this box if you attach hazard information.											

- 4. Occupational Exposures You must make separate confidentiality claims for the description of worker activity, physical forms of the substances, number of workers exposed, and the duration of activity. Mark (x) in the "Confidential" box next to any item you claim as confidential.
- (1) Describe the activities in which workers may be exposed to the chemical substance. Include activities in which workers wear protective equipment.
- (2) Mark (x) in this column if entry in column (1) is confidential.
- (4) Mark (x) in this column if entry in column (3) is confidential.
- (5) Estimate the maximum number of worked involved in each activity.
- (6) Mark (x) in this column if entry in column (5) is confidential.
- (7) and (8) Estimate the maximum duration of the activity for any worker in hours per day and days per year.
- (9) Mark (x) in this column if entries in columns (7) and/or (8) are confidential.

Worker Activity	Confi-	Physical Forms	Confi-	Maximum	Confi-	Maximum Duration		Confi-
(1)	dential Forms (2) (3)	dential Number (4) (5)	Number (5)	dential (6)	Hrs/Day (7)	Days/Yr (8)	dential (9)	

		1.4	90000				
Part IV - List of A	Attachments						
Attach continuation sheets for sections of the form and optional information after this page. Clearly identify the attachment and the section of the form to which it relates, if appropriate. Number consecutively the pages of the attachments. In column (2) below, enter the inclusive page numbers of each attachment.							
Mark (x) in the "Confidential" box next to any attachment name you claim as confidential. Read the Instructions for guidance on how to claim any information in an attachment confidential.							
Attachment name (1)		Attachment page numbers (2)	Confidential (3)				
Mark (x) this box if you attach a continuation sheet. Enter the attachment name and number.							
Certifica	tion						
I certify that to the best of my knowledge and belief: 1. The company named in Part I, Section 1a. of this form manufactures, imports, or processes, other than in small quantities for research purposes, the substance identified in Part I, Section B. 2. All information provided in this notice is complete and truthful as of the date of submission.							
Signature of authorized official	Date		Confi- dential				
Signature of agent (if applicable)	Date		Confi- dential				

Instructions

EPA Form 7710-41, Dioxins / Furans Report

You must provide all information requested in this form to the extent that it is known to or reasonably ascertainable to you.

Part 1 - General Information

You must provide the chemical identity of the chemical substances reported on, even if you claim the identity as confidential.

Part II - Process and Release Information

You may need additional copies of Part II, Sections A and B if there are several manufacturing operations that you will describe in the form. You should reproduce these sections as needed.

Part III - Production, Import, and Use Information

You must provide production volume, percent of production used for each use category, and whether use is industrial, commercial, or consumer. Also included is a copy of any hazard warning and a report of occupational exposure. Copies may be made of any part of the form if additional space is needed.

Part IV - List of Attachments

You should attach additional sheets if you do not have enough space on the form to answer a question fully. In Part IV, list all attachments you include with the form.

Optional Information

You may include with the form any information that you want EPA to consider in evaluating the substance.

Confidentiality Claims

You may claim any information in this form as confidential. To assert a claim on the form, mark (x) the "Confidential" box next to the information that you claim as confidential. To assert a claim in an attachment, circle or bracket the information you claim as confidential.

A. General Instructions

Complete the form using a typewriter or by printing legibly in black ink. All information must be in English. Provide all information requested on the form to the extent that you know or can reasonably ascertain it. You may attach continuation sheets to any subsection or item on the form. Mark (x) the appropriate box on the form if you attach continuation sheets.

The use of the term "manufacture" in this form includes both manufacture and import. Manufacturers and importers must fully comply with the information requirements set forth in the Polyhalogenated Dibenzo-p-dioxins / Dibenzofurans Testing and Reporting Requirements Rule. However, importers are not required to submit any data under section 8(a) of the Toxic Substances Control Act (TSCA) that relates solely to exposure of humans or the environment outside of the United States.

Any manufacturer or importer using this form may photocopy the form, sections of the form, or these instructions as frequently as needed.

B. Certification

The official named in Part I, Section A of the form, as the person submitting the notice, must sign the certification on page 6 of the form. This official is responsible for the truth and accuracy of each statement in the certification.

C. Asserting Confidentiality Claims

A manufacturer or importer may assert a claim of confidentiality for any information submitted to EPA on this form. To assert confidentiality claims for specific information on the form (e.g., submitter identity, process data, or use information), mark (x) in the "Confidential" box on the form located to the right of the information. Marking these boxes will provide a quick reference for EPA to determine what information is confidential, thus aiding proper treatment of confidential business information.

Part I - General Information

Section A - Submitter Identification

Person submitting notice - Enter information on the official who signs the general Certification on page 6.

Section B - Chemical Identity Information

Chemical name and CAS registry number - List the common name and Chemical Abstracts Service registry number, if available, for the chemical on which you are reporting.

Part II - Process and Release Information

Section A - Flow Diagram

Flow diagram - Submit a block flow diagram for each major unit operation and treatment process involved in the manufacture of the chemical on which you are reporting. Include the following information:

- (1) Identify the product process and chemical intermediates, co-products, and byproducts produced by the process;
- (2) Provide a block for each major unit operation (e.g., reactor, washer, filtration, air emission control, aeration lagoon, etc.) in the production process and in the residuals management process;
- (3) Identify all process inputs such as raw materials, reagents, solvents, etc. by the chemical or common name and CAS number, and indicate the point of introduction with arrows.
- (4) For each unit operation in which the temperature is not ambient, specify temperature or temperature range in each block of the flow diagram.
- (5) For each unit operation in which the operating pressure is not atmospheric, specify pressure or pressure range in each block of the flow diagram.
- (6) Identify the composition of the reaction vessel wherever one is used.
- (7) Number all points in the flow diagram from which the chemical substance will be released into the environment. See the example provided.

Section B - Environmental Release and Disposal

Column (1) - For each release point indicated in the flow diagram (Part I, Section A), enter the corresponding number.

Column (2) - Estimate the amount of the chemical (in kg/day for continuous operations or kg/batch for batch operations) that will be released from the release point before entering control technology. Base your estimate on your maximum 12-month production volume.

Column (4) - Enter the medium (air, water, land) into which the release stream discharges (whether or not control technology is used).

Column (5) - For releases to the air and water, describe the type of technology used to control the release of the chemical. Examples of control technologies include carbon filter, scrubber, and biological treatment (primary, secondary, etc.). Give as complete a description as possible. Enter "none" if no control technology is used and the substance is released directly to the environment. For disposal on land, describe the landfill site construction (including liners) and handling procedures. Describe landfill containers.

Column (7) - Mark (x) the appropriate box and/or specify other destinations of water releases.

Columns (3) and (6) - Note that you must make separate confidentiality claims for the release number and amount of chemical substance released and other release and disposal information.

Part III - Production, Import, and Use Information

Production Information

Production volume - Report the production volume for the past 12 months of production. Also report the maximum production volume during the past 3 years of manufacture. Provide this information in kilograms. Include in your report the amounts produced by persons under contract to you. If part of the amount manufactured is for export, include this amount in your reports.

Use Information

Column (1) - Identify each possible category of use of the chemical substance by describing its function and application. "Function" is related to the inherent physical and chemical properties of the substance, (e.g., degreaser, catalyst, plasticizer, ultraviolet absorber). "Application" refers to the use of the substance in particular processes or products (e.g., a degreaser may be used for cleaning of fabricated metal parts). Following are some examples of how you should describe categories of use:

- a disperse dye carrier for finishing polyester fibers
- a cross-linking agent for epoxy-like coatings for metal surfaces
- a flame retardant for surface application on cotton apparel, textile home furnishing, and exterior canvas products
- a surfactant in automobile spray wax
- a colorant for paper and other cellulosics

Column (3) - Report the percent of the total production volume during the past 12 months manufactured for each category of use.

Column (5) - Estimate the weight percent of the chemical substance contained in any formulated mixture, suspension, emulsion, solution, or gel associated with each category of use as manufactured for commercial purposes at sites under your control. Where the substance is not distributed from your site neat, enter N/A for Not Applicable.

Formulated

For example:

Category of Use	Product as <u>Manufactured</u>	Percent of Chemi- cal Substance
Cross-linking age for epoxy-type coatings for metal surfaces	neat	N/A
Flame retardant fo cotton apparel	or none; distributed neat	N/A
Surfactant in automobile spray wax	spray auto wax (suspension)	4
Colorant for pape and other cellulosics	r colorant (solution	n) 56

Column (7) - Mark (x) to indicate if the category of use is sitelimited. Also mark (x) to indicate whether the use is for industrial, commercial, and/or consumer use as defined below. Mark more than one box if appropriate. For example, a surfactant in an automobile wax may have a consumer use in liquid wax, a commercial use in auto washes, and an industrial use by automobile manufacturers.

Site-limited: The substance is used only on the contiguous property unit where it is manufactured and not intentionally distributed outside that site except for waste disposal. This includes all factories, storage spaces, and warehouses at the site. An example would be an intermediate that is further reacted on-site to produce a chemical product.

Industrial: The chemical substances or products containing the substance are used only at the site of other manufacturers or processors, e.g., textile dyeing, paint formulation, use of a resin to manufacture an article.

Commercial: The chemical substances or products containing the substance are used only by a commercial enterprise providing a consumer service, e.g., use by commercial dry cleaning establishments, use by painting contractors, or use by roofers in commercial building construction.

Consumer: The chemical substances or products containing the substance are used by private individuals in or around a residence, or during recreation, or for any other personal use or enjoyment, e.g., automotive polish, dyed wearing apparel, household cleaners, etc.

Columns (2), (4), (6), (8) - Note that you must make separate confidentiality claims for the description of the category of use, the percent of production devoted to each category, and other use information. The information in this section is used to evaluate potential exposure to the chemical. If you wish to provide any additional information that would assist in this analysis, it may be submitted as optional information.

C. Hazard Information

Include with the form a copy or reasonable facsimile of any hazard warning statement, label, material safety data sheet, or other information that is provided to any person regarding protective equipment or practices for the safe transport, use or disposal of the chemical. Identify any copies of hazard information or warnings that you attach in Part IV, List of Attachments.

D. Occupational Exposure Information

Column (1) - Describe each specific activity in the operation during which workers may be exposed to the chemical. Such activities may include charging reactor vessels, sampling for quality control, transferring materials from one work area to another, drumming, bulk loading, changing filters, and cleaning equipment. Activities must be described even if workers wear protective equipment or clothing. (Recommended protective equipment should be included as part of Hazard Information.)

Column (3) - Indicate the physical form of the substance at the time of exposure, e.g., solid (crystals, granules, powder, dust), liquid (solution, paste, slurry, emulsion, mist, spray), gas (vapor, fumes), even if workers wear protective equipment.

Column (5) - Report the maximum number of workers involved in each specific activity, based on the reported maximum 12-month production volume.

Column (7) - Enter the maximum duration that any one worker will engage in the activity in hours/day, e.g., 8 hours/day.

Column (8) - Enter the maximum duration that any one worker will engage in the activity in days/year, based on the reported maximum 12-month production volume, e.g., 200 days/year.

Columns (2), (4), (6), (9) - Note that you must make separate confidentiality claims for the description of worker activity, physical form of the chemical, number of workers exposed, and duration of exposure.

Part IV - List of Attachments

Attach any continuation sheets for sections of the form, and any optional information, after the last page of the form. Clearly identify the attachment and the section to which it relates. Number consecutively the pages of the attachments. Enter the total number of pages in the form on the last line of the List of Attachments. Mark (x) the "Confidential" box next to any attachment you claim as confidential. See the section of these Instructions titled Confidentiality for guidance on claiming any information confidential.