

Mercury Electronic Reporting User Guide – Primary Agent/Consultant

Environmental Protection Agency

Office of Pollution Prevention and Toxics

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Revision Log

Date	Version No.	Description	Author	Reviewer	Review Date
07/25/18	0.01	Delivery of Initial Draft of OPPT CIS Mercury Electronic Reporting User Guide – Primary Agent/Consultant	C. Yeh	S. Cheng	07/25/18

1 Introduction

This document presents the user guide for the Office of Pollution Prevention and Toxics (OPPT) Mercury Electronic Reporting application submission process. This document is the user guide for the Primary Agent/Consultant user of the Mercury Electronic Reporting application.

The Mercury Electronic reporting application is the electronic, web-based tool provided by Environmental Protection Agency (EPA) for the submission of mercury data. As a Primary Agent/Consultant, you can create or modify any Mercury Electronic Reporting form. You can also delete Mercury Electronic Reporting forms, create revised forms, and download the Copy of Record (CoR). You may not submit original forms, but can submit amendments.

For questions concerning the Toxic Substances Control Act (TSCA) Mercury Electronic Reporting software requirements, please contact the Central Data Exchange (CDX) Help Desk at helpdesk@epacdx.net or call 1-888-890-1995 between the hours of 8 am – 6 pm Eastern Standard Time (EST).

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2 System Requirements

To use the Mercury Electronic Reporting (MER) application to submit an MER form the following are required:

- An e-mail account
- JavaScript enabled web browser
- Internet access
- Adobe Acrobat Reader 5.0 or higher
- CDX username and password

2.1 Supported Browsers

- Vendor supported versions of Internet Explorer (IE) or Edge
 - Go to the following link to download:
<https://support.microsoft.com/en-us/help/17621/internet-explorer-downloads>
- Vendor supported versions of Mozilla Firefox
 - Go to the following link to download:
<https://www.mozilla.org/en-US/firefox/new/>
- Vendor supported versions of Safari
 - Go to the following link to download:
<https://support.apple.com/downloads/>
- Vendor supported versions of Google Chrome
 - Go to the following link to download:
<http://www.google.com/chrome>

2.2 Screen Resolution

Screen resolution should be set to 1024 x 768 or greater.

3 Primary Agent/Consultant Functions

This section describes how to:

- Access the application
- Navigate the Mercury Electronic Reporting 'Home' screen
- Start and complete the Mercury Electronic Reporting form
- Download a Copy of Record
- Create an amendment

The Primary Agent/Consultant is not responsible for the submission of original forms. The Primary Agent/Consultant is an individual who serves as a consultant to a specific company. However, this individual is not responsible for and does not have the authority to submit data since the agent/consultant does not technically work for the submitting company.

As a Primary Agent/Consultant, you can create forms within the Mercury Electronic Reporting application. You may not assign Support users to a form. A Primary Agent/Consultant can submit amendments, unlock submissions, and delete forms.

You can save the form at any point during the data entry process. The save functionality will allow you to return to that same form at any point in the future. You can print the form at any point; however, the 'Not For Submission' watermark will be placed on the form anytime the form is printed prior to actual submission.

Exhibit 3-1 shows a table of the user role capabilities within the Mercury Electronic Reporting application:

Exhibit 3-1 Mercury Electronic Reporting User Roles Matrix

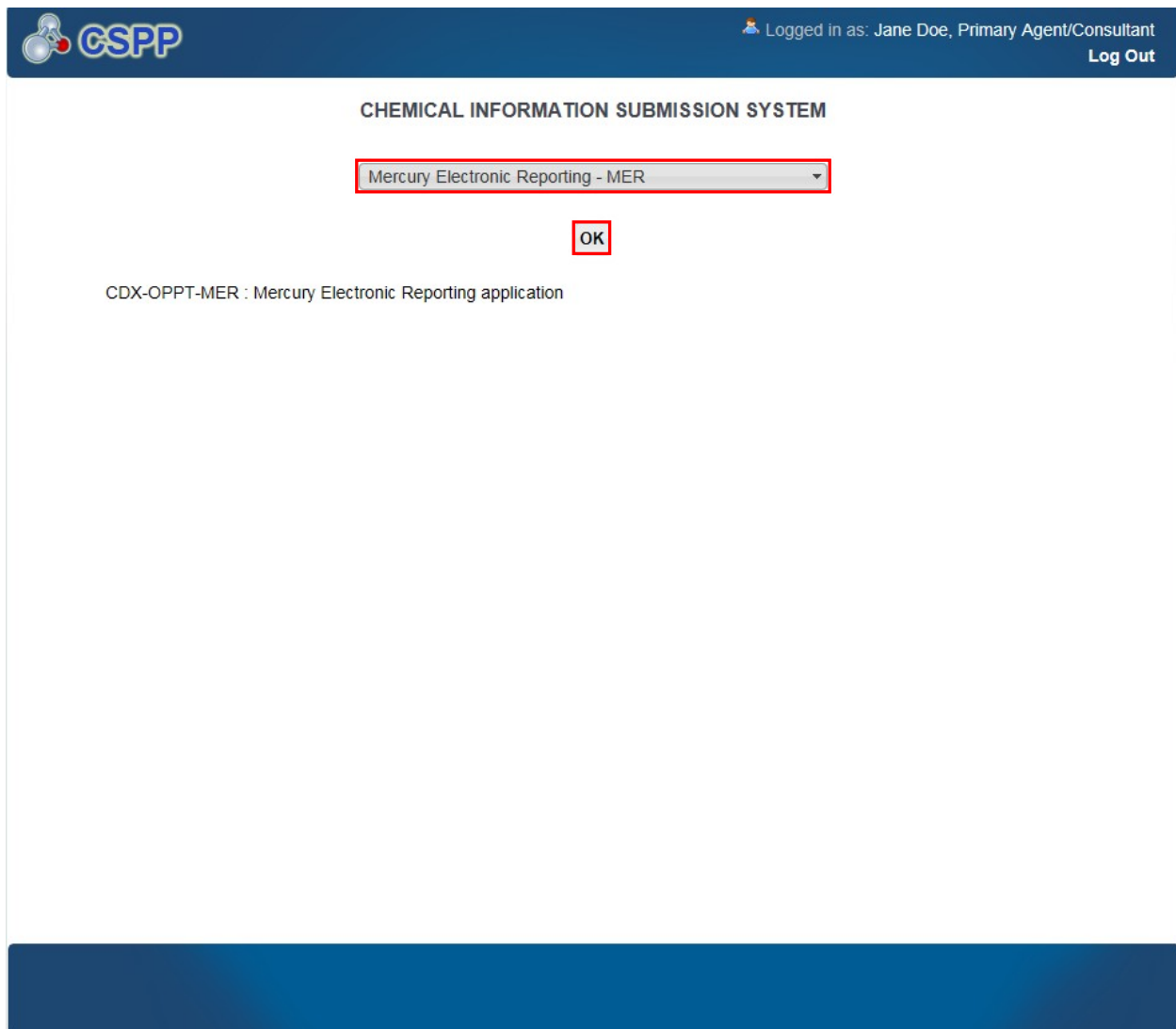
Legend X=Can Perform Function	Primary Authorized Official		Primary Agent/Consultant		Primary Support	
	(Primary Company Authorized Official)		(Primary Sponsored Authorized Official)			
	US	non-US	US	non-US	US	non-US
MER form						
Create all original forms	X	X	X	X		
Submit original forms	X					
Submit amendments (by editing the form)	X	X	X	X		
Unlock all forms	X	X	X	X		
Edit unlocked forms	X	X	X	X	X	X
Delete forms	X	X	X	X		
Assign Supports	X	X				
Receive EPA Communications	X	X	X	X		

3.1 Log into Mercury Electronic Reporting Application

After you create an account in CDX, click the ‘Primary Agent/Consultant’ link for the Chemical Safety and Pesticide Programs (CSPP) data flow to navigate to the ‘Chemical Information Submission System’ screen.

Exhibit 3-2 shows a screen capture of the ‘Chemical Information Submission System’ screen:

Exhibit 3-2 Chemical Information Submission System Screen



Navigation: To access the Mercury Electronic Reporting ‘Home’ screen, select ‘Mercury Electronic Reporting – MER’ from the submission type drop-down menu and click the ‘OK’ button.

3.2 Mercury Electronic Reporting Home Screen Navigation

You can access the Mercury Electronic Reporting ‘Home’ screen by selecting ‘Mercury Electronic Reporting – MER’ from the submission type drop-down menu on the ‘Chemical Information Submission System’ screen and clicking the ‘OK’ button.

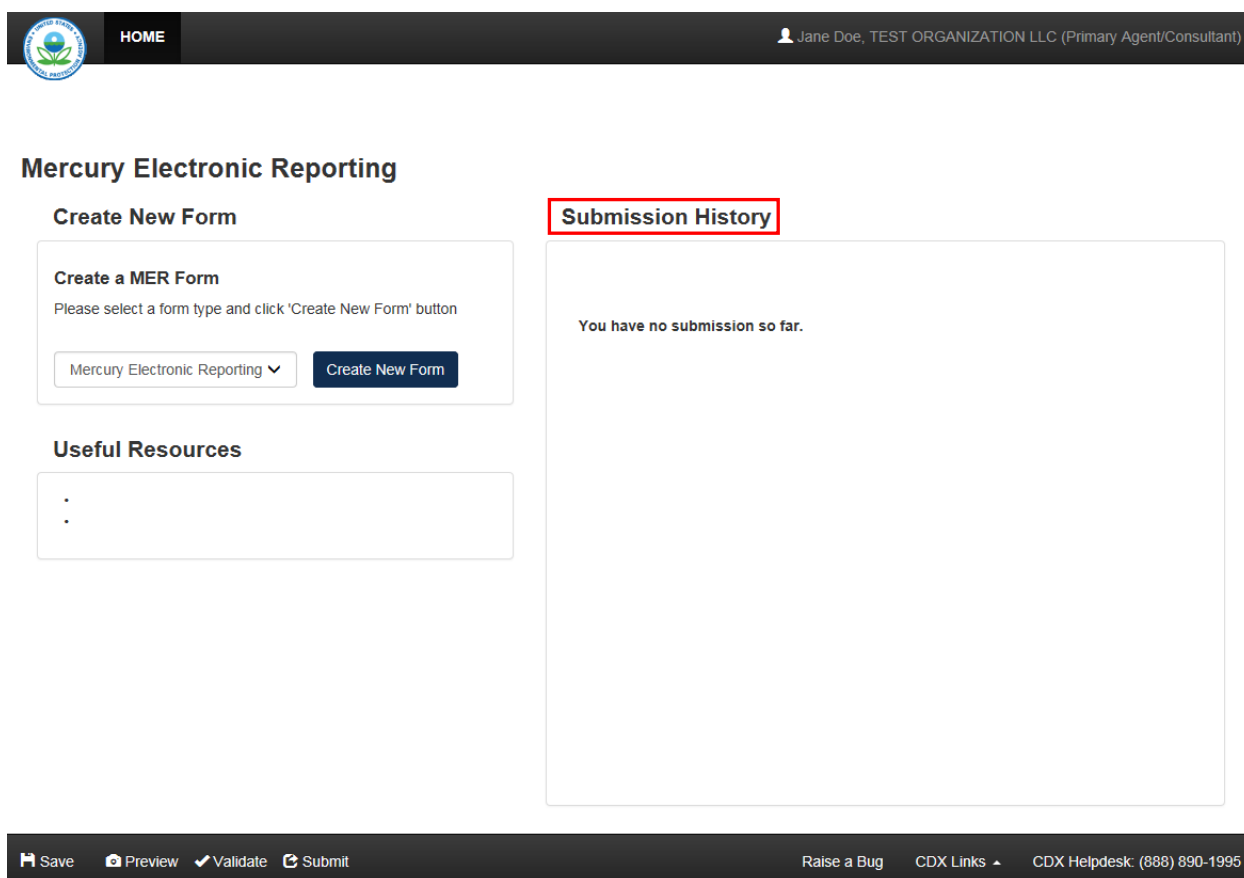
The Mercury Electronic Reporting ‘Home’ screen is the first screen within the Mercury Electronic Reporting application. It displays the ‘Create New Form,’ ‘Useful Resources,’ and ‘Submission History’ sections.

There is a ten (10) minute logout timer for this application; the application will automatically log you out after ten minutes of inactivity and navigate you back to the CDX login screen.

- **Create New Form:** Click the ‘Create New Form’ button to navigate to the ‘Create Passphrase’ page to create the form selected from the ‘Form Type’ drop-down menu.
- **Useful Resources:** Click the links within the ‘Useful Resources’ section.
- **Submission History:** Modify or delete a MER form using the ‘Submission History’ table. For additional details about the ‘Submission History’ table, please refer to **Section 3.3**.

Exhibit 3-3 shows a screen capture of the Mercury Electronic Reporting ‘Home’ screen:

Exhibit 3-3 Mercury Electronic Reporting Home Screen



3.3 Submission History

Only one Mercury Electronic Reporting form is created per form alias, which helps differentiate between forms. Each column within the ‘Submission History’ table can be sorted by clicking the individual column headers.

Start New Form: To create a new Mercury Electronic Reporting form, select ‘Mercury Electronic Reporting’ from the ‘Form Type’ drop-down menu and click the ‘Create New Form’ button. You are required to create a passphrase that will be associated with that particular form.

Make sure to create a passphrase that you will remember, as it cannot be retrieved or reset. Refer to **Section 3.4** for further instructions on creating a passphrase.

Edit an ‘In Progress’ Form: To modify an existing Mercury Electronic Reporting form, click the ‘Form Alias’ link for a form with a status of ‘In Progress.’ You are required to enter the passphrase associated with that particular form to access and edit the form. It is possible for more than one user to modify a form simultaneously; the user that edits and saves changes within a form first will have his/her modifications saved.

Amend a submitted form: To edit an already submitted Mercury Electronic Reporting form (i.e., to create an amendment), you must first unlock the particular submission by clicking the ‘Lock’ icon (🔒) under the ‘Action’ column. You will be required to enter the passphrase associated with that particular submission to gain access and continue amending the submission. All further changes that are made will be submitted as an amendment. Refer to **Section 11** for further instructions on creating an amendment.

The ‘Submission History’ table displays the following fields and columns of information:

- **Show Entries:** Select a number from the ‘Show entries’ drop-down menu to specify the number of entries that display on the current page.
- **Search:** Enter search criteria to filter the forms included within the ‘Submission History’ table.
- **Form Alias:** Displays the form alias of a Mercury Electronic Reporting form. Click the form alias link to navigate to the ‘Enter Passphrase’ page and complete/edit a form.
- **Form Type:** Displays the form type of the specific form. This column displays ‘Mercury Electronic Reporting.’
- **Case Number:** Displays the case number of a completed submission (MER-YYYY-XXXX). The ‘YYYY’ represents the reporting year in which the form was submitted, and the ‘XXXX’ represents the order in which the form was received.
- **Submission Date:** Displays the date that a form was successfully submitted to EPA via CDX. This date populates only after the form has been submitted.
- **Status:** Displays the statuses of an MER form (either ‘In Progress,’ ‘Submitted,’ or ‘Completed’).
- **Copy of Record:** Click the ‘Copy of Record’ icon (📄) to navigate to the ‘Enter Passphrase’ screen to continue to the ‘Copy of Record’ screen. The ‘Copy of Record’ icon displays only after the form has been completed.
- **Action:** Click the ‘Delete’ icon (✖) to delete an in-progress form. Click the ‘Lock’ icon (🔒) to unlock a form for an amendment. The form remains unlocked and will display the ‘Unlocked’ icon (🔓) until the form is resubmitted by the AO.
- **Export Options:** Click the ‘XML,’ ‘CSV,’ ‘PDF,’ or ‘Excel’ link to download the ‘Submission History’ table as an .xml, .csv, .pdf, or .xlsx file, respectively.
- **Previous:** Click the ‘Previous’ button to navigate to the previous set of submissions currently displayed (if applicable).
- **Next:** Click the ‘Next’ button to navigate to the subsequent set of submissions (if applicable).

Exhibit 3-4 shows a screen capture of the Mercury Electronic Reporting ‘Submission History’ table:

Exhibit 3-4 Mercury Electronic Reporting Submission History Table

Navigation: Select a form type from the ‘Form Type’ drop-down menu and click the ‘Create New Form’ button to navigate to the ‘Create Passphrase’ screen.

3.4 Create Passphrase

To start a new Mercury Electronic Reporting form, select a form type from the ‘Form Type’ drop-down menu, and click the ‘Create New Form’ button on the Mercury Electronic Reporting ‘Home’ screen to navigate to the ‘Create Passphrase’ screen, which allows you to create a passphrase and associate that passphrase with your newly created form.

The application uses the passphrase as an encryption key to protect the contents of the form. You are responsible for remembering the passphrase and distributing it to the appropriate individuals.

If you lose or forget your passphrase, you will not be able to access your Mercury Electronic Reporting (MER) Form to print, submit, or make changes. You will need to complete a new Mercury Electronic Reporting (MER) Form and create a new passphrase for the form. For security reasons, the system administrator will not have access to your passphrase and will not be able to retrieve it or reset it.

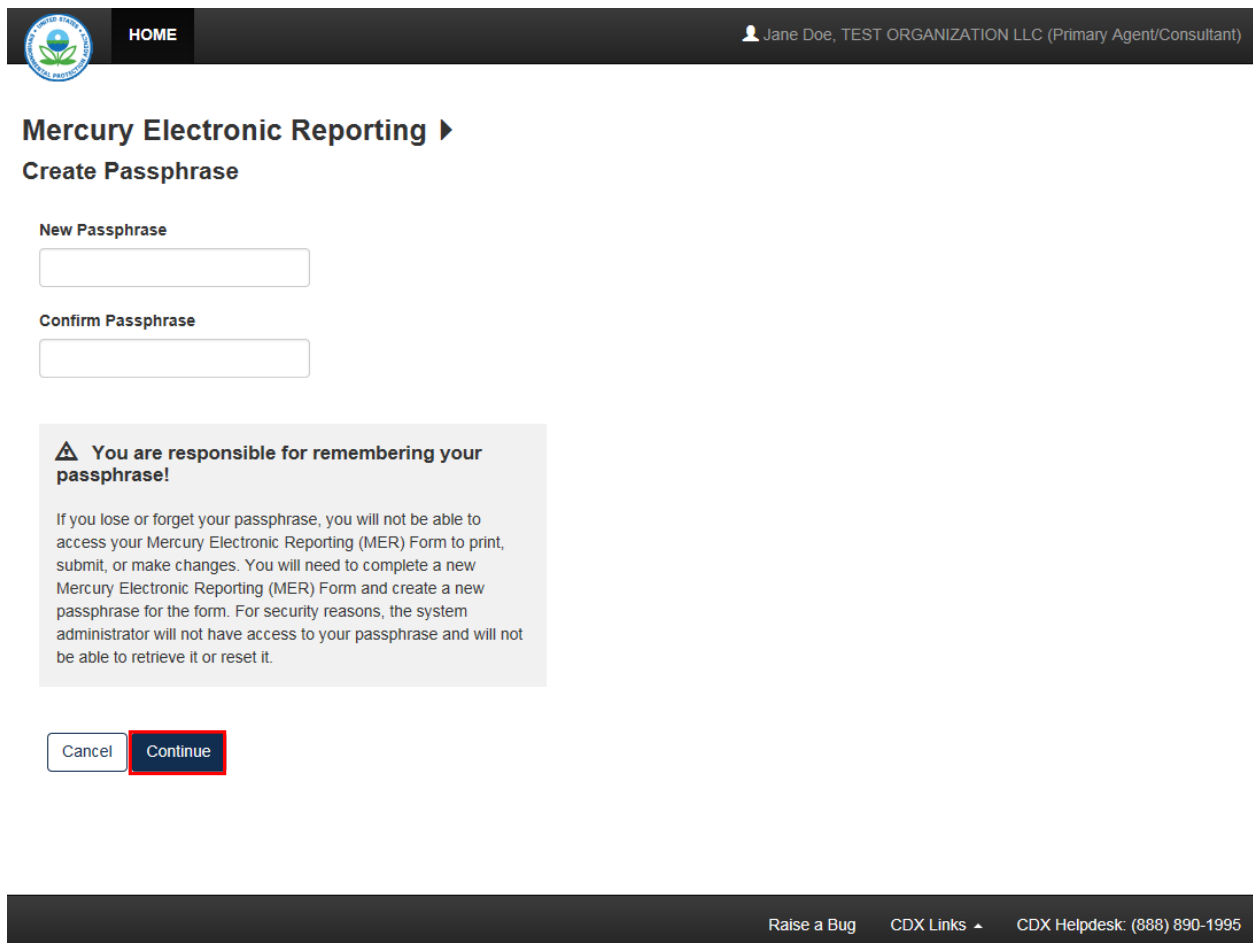
- **New Passphrase:** Enter a passphrase that is between 8 to 20 characters. For maximum security, your passphrase should contain a combination of letters and numbers. Your passphrase should not contain special characters (for example, +, ?, and *). As a Primary

user, you are responsible for remembering your passphrase and distributing it to only authorized individuals. The passphrase is used as an encryption key to protect the contents of the form data.

- **Confirm Passphrase:** Enter the same passphrase that was entered into the ‘New Passphrase’ field. The same passphrase may be associated with multiple forms. The user can choose to have the same passphrase for all forms.

Exhibit 3-5 shows a screen capture of the ‘Create Passphrase’ screen:

Exhibit 3-5 Create Passphrase Screen



Navigation: Create a passphrase and click the ‘Continue’ button to navigate to the ‘Introductory Questions’ screen in a Mercury Electronic Reporting form.

3.5 Enter Passphrase

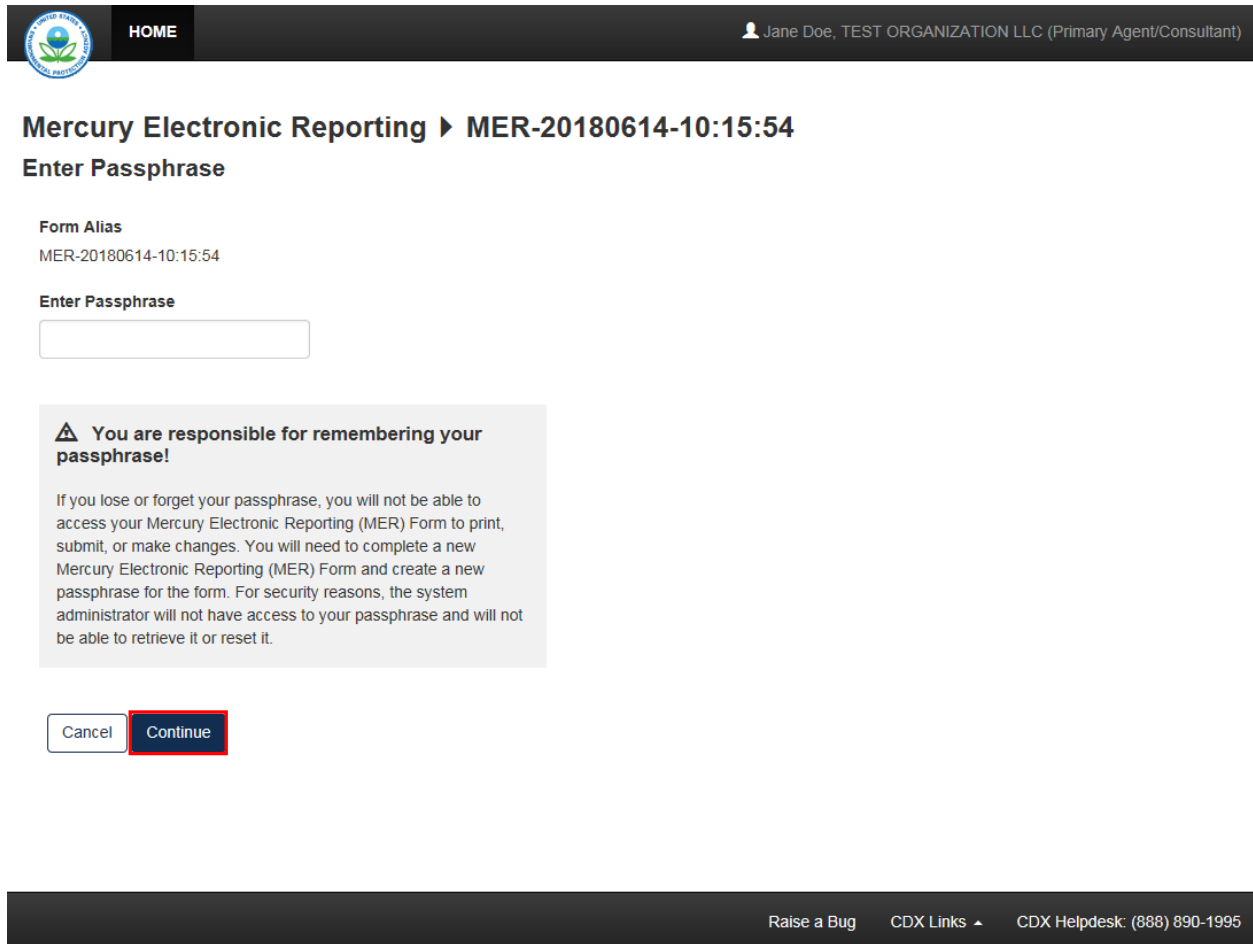
To edit a form, click the ‘Form Alias’ link for a Mercury Electronic Reporting form with a status of ‘In Progress.’ The ‘Enter Passphrase’ screen requires you to enter the passphrase that is associated with the form.

- **Form Alias:** Displays the form alias that is used to identify the form.

- **Enter Passphrase:** Enter the same passphrase that was used to create the form. For security reasons, the system administrator does not have access to the passphrase and cannot retrieve it or reset it to a new one. If a user has forgotten the passphrase, a new form will need to be created with a new passphrase.

Exhibit 3-6 shows a screen capture of the ‘Enter Passphrase’ screen:

Exhibit 3-6 Enter Passphrase Screen



Navigation: Enter the passphrase that you originally created and associated with the form and click the ‘Continue’ button to navigate to the ‘Introductory Questions’ screen.

3.6 Action Bar

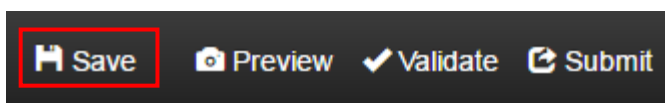
The action bar is located at the top and bottom of the form on each screen. You can perform the following functions using the top action bar:

- **Home:** Click the ‘Home’ link to navigate to the Mercury Electronic Reporting ‘Home’ screen.
- **User ID:** Click the user ID link in the top right-hand corner to log out of the application.

The following exhibits, Exhibit 3-7, Exhibit 3-8, Exhibit 3-9, and Exhibit 3-10 show screen captures for the bottom action bar:

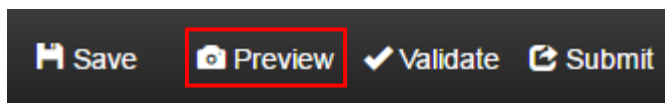
- Save:** Click the ‘Save’ link at any stage of completing a Mercury Electronic Reporting form to save the form. To generate and access links to other pages of the form within the navigation header, you must click the ‘Save’ link within the action bar. After you click the ‘Save’ link, you will receive a message indicating that all data entered in the form has been saved successfully. The save function does not validate any entered data. Click the ‘Previous’ and ‘Next’ buttons on a form to save the data entered within a form. Click the ‘X’ button in the upper right-hand corner of the form in your browser to close the form without saving.

Exhibit 3-7 Action Bar – Save



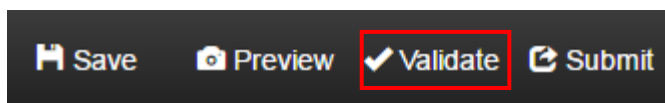
- Preview:** Click the ‘Preview’ link to preview the form. After you click the ‘Preview’ link, you will be given the option to view a regular version of the PDF(s) or a sanitized version of the PDF(s). Choosing either option will generate a watermarked PDF displaying the data identified within the form in a separate window. Refer to **Section 5** for more information on previewing a form.

Exhibit 3-8 Action Bar – Preview



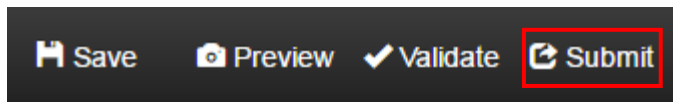
- Validate:** Click the ‘Validate’ link at any stage of completing a Mercury Electronic Reporting form. A ‘Mercury Electronic Reporting Validation’ window generates when you click the ‘Validate’ link if you disable the pop-up blocker within your internet browser. The ‘Mercury Electronic Reporting Validation’ window displays a report of all warning messages. Refer to **Section 6** for more information on validating a form.

Exhibit 3-9 Action Bar – Validate



- Submit:** Click the ‘Submit’ link to submit a Mercury Electronic Reporting form after completing all sections of a Mercury Electronic Reporting form. After you click the ‘Submit’ link a pop-up message displays to confirm the submission process. The form validates during the submission process and displays any applicable warning or error messages. Refer to **Section 6** for further instructions on validation errors. You can continue with the submission process only after clearing all validation errors. Upon successful submission of the form, the application generates and sends an email indicating the successful submission of the form to the submitter’s email address. Refer to **Section 8** for more information on submitting a Mercury Electronic Reporting form. Please note that Primary Agents/Consultants cannot submit original Mercury Electronic Reporting forms, thus this link will not appear for original forms unless a submission is being amended.

Exhibit 3-10 Action Bar – Submit



- **CDX Links:** Click any of the ‘CDX Links,’ located at the bottom of each screen within the ‘CDX Links’ drop-down menu, at any stage of completing a Mercury Electronic Reporting form.
 - o Click the ‘CDX Homepage’ link to navigate to the ‘CDX’ homepage.
 - o Click the ‘MyCDX Homepage’ link to navigate to the ‘MyCDX’ page.
 - o Click the ‘EPA Homepage’ link to navigate to the EPA Homepage.
 - o Click the ‘Terms and Conditions’ link to navigate to the CDX Terms and Conditions screen.
 - o Click the ‘Privacy Notice’ link to navigate to the CDX Privacy and Security Notice screen.

Exhibit 3-11 shows a screen capture of the action bar ‘CDX Links’:

Exhibit 3-11 CDX Links



3.7 Search Substance Registry Services (SRS)

The ‘Search SRS’ button displays on various screens within a Mercury Electronic Reporting form to identify chemicals that may be stored in SRS.

Search SRS: Click the ‘Search SRS’ button to generate the ‘Search Substance Registry Services’ pop-up window. You can search for the reported chemical(s) by either the ‘Chemical Abstracts Service Registry Number (CASRN)’ or ‘CA Index Name or Other Synonym.’ The application also offers the option of entering user-specified chemical information by clicking the ‘Add Chemical’ button. Click the ‘Add Chemical’ button to generate the ‘Chemical Not Found In Substance Registry Services’ pop-up window and enter chemical information by filling in the ‘Chemical Name’ and ‘CASRN’ (this is required) field under the manual entry field set.

The system allows you to enter each chemical by clicking the ‘OK’ button located at the bottom of the ‘Search SRS’ window. Once you enter all known chemical information and click the ‘OK’ button, the chemical information saves and populates into the chemical description table. The ‘Actions’ column of the chemical table allows you to delete chemicals that have been added.

An error message generates if a user attempts to add a duplicate chemical on the same page.

- **CASRN:** Enter the chemical abstracts service registry number of the chemical; this field accommodates dashes. Either the 'CASRN' or 'CA Index Name or Other Synonym' field is required when searching SRS.
- **CA Index Name or Other Synonym:** Enter the chemical abstract '(CA) Index Name or Other Synonym' of the chemical. This field displays the following options: 'Matches Exactly,' 'Contains,' and 'Begins With.' Either the 'CASRN' or 'CA Index Name or Other Synonym' field is required when searching SRS.
- **Search SRS:** Click the 'Search SRS' button to initiate the database search for the 'CASRN' or 'CA Index Name or Other Synonym' for the desired chemical.
- **Add Chemical:** Click the 'Add Chemical' button to generate the 'Chemical Not Found In Substance Registry Services' pop-up window.

The 'Search Substance Registry Services' window is under development.

Navigation: Click the 'Search SRS' button on the 'Search Substance Registry Services' window to initiate the database search for the 'CASRN' or 'CA Index Name or Other Synonym.' After SRS returns results, select the radio button associated to a chemical, click the 'OK' button on the 'Search SRS' window, and the application populates the chemical information into the screen from which the SRS search was initiated.

If the chemical is not found in the 'Search Substance Registry Services' window, click the 'Add Chemical' button to generate the 'Chemical Not Found In Substance Registry Services' pop-up window.

- **Chemical Name:** Enter the chemical name.
- **CASRN:** Enter the CASRN; this is a required field.
- **Cancel:** Click the 'Cancel' button to navigate back to the 'Search Substance Registry Services' pop-up window.
- **OK:** Click the 'OK' button to enter the manually entered chemical information into the fields on the screen from which the SRS search was initiated.

The 'Chemical Not Found in Substance Registry Services' window is under development.

Navigation: Click the 'OK' button to save the specified chemical information and navigate back to the screen from which the SRS search was initiated where the chemical information will be populated. Click the 'Cancel' button to navigate back to the 'Search SRS' pop-up window. Click the 'X' located in the upper right-hand corner to close the pop-up window and navigate back to the screen from which the SRS search was initiated.

4 Create Mercury Electronic Reporting Form

Anyone who manufactures (including imports) mercury or mercury-added products, or intentionally uses mercury in a manufacturing process must report the amount of mercury used in the specified activities during a given reporting year. These activities include manufacture, import, distribution in commerce, storage, and export.

The definition of mercury includes elemental mercury and a mercury compound. Elemental mercury is limited to elemental mercury and mercury compounds are inclusive of all substances where elemental mercury or a mercury compound is reacted with another chemical substance.

4.1 Create Mercury Electronic Reporting Form

To create a new Mercury Electronic Reporting (MER) form, navigate to the Mercury Electronic Reporting 'Home' screen and select 'Mercury Electronic Reporting' from the 'Form Type' drop-down menu. Refer to **Section 3.2** for additional details regarding the Mercury Electronic Reporting 'Home' screen.

Refer to **Section 3.4** for additional details regarding the create passphrase process.

4.2 Introductory Questions

You can navigate to the 'Introductory Questions' screen by clicking the 'Create New Form' button and creating a new passphrase, or by accessing an MER form that is in progress and entering the passphrase associated with the selected form.

The 'Introductory Questions' screen provides checkboxes to determine which information will need to be entered within a form. You will also have the option to assign a 'Submission Alias' to identify the form. A unique form alias is helpful when a user or company has multiple forms and/or when you must differentiate between forms to the help desk. Upon navigating to the 'Introductory Questions' screen, the system auto-generates a default alias comprised of a form type, date stamp, and time stamp in the following format: <MER-YYYYMMDD-HH:MM:SSS Time Zone>.

The application contains the following functionality and will generate additional screens:

The 'Elemental Mercury' section provides checkboxes to indicate that elemental mercury is manufactured, imported, and/or processed. The 'Mercury Compounds' section provides checkboxes to indicate that mercury compounds are manufactured, imported, and/or processed. The 'Both' section allows a user to select checkboxes from both sections. Selecting the checkboxes generates the relevant questions within a form; at least one checkbox must be checked.

- **Submission Alias:** Enter the submission alias. Upon navigating to the screen, the application displays an auto-generated editable submission alias in the following format: MER-YYYYMMDD-HH:MM:SS Time Zone>. This is a required field.
- **Elemental Mercury:** Select the 'Elemental Mercury' radio button to enable the relevant questions and indicate that elemental mercury information will be provided. If selected, at least one checkbox must be checked.

- **Q1: My company manufactures (other than imports) elemental mercury:** Check the checkbox to indicate that the reporting company manufactures elemental mercury. If selected, the ‘Question 1’ screen displays within the form.
- **Q2: My company imports elemental mercury:** Check the checkbox to indicate that the reporting company imports elemental mercury. If selected, the ‘Question 2’ screen displays within the form.
- **Q3: My company manufactures (other than imports) elemental mercury-added products:** Check the checkbox to indicate the reporting company manufactures elemental mercury-added products. If selected, the ‘Question 3’ screen displays within the form.
- **Q4: My company imports elemental mercury-added products:** Check the checkbox to indicate that the reporting company imports elemental mercury-added products. If selected, the ‘Question 4’ screen displays within the form.
- **Q5: My company uses elemental mercury in a manufacturing process (other than manufacturing mercury compounds and/or manufacturing elemental mercury-added products):** Check the checkbox to indicate that the reporting company uses elemental mercury in a manufacturing process. If selected, the ‘Question 5’ screen displays within the form.
- **Mercury Compounds:** Select the ‘Mercury Compounds’ radio button to enable the relevant questions and indicate that mercury compounds information will be provided. If selected, at least one checkbox must be checked.
- **Q6: My company manufactures (other than imports) mercury compounds:** Check the checkbox to indicate that the reporting company manufactures mercury compounds. If selected, the ‘Question 6’ screen displays within the form.
- **Q7: My company imports mercury compounds:** Check the checkbox to indicate that the reporting company imports mercury compounds. If selected, the ‘Question 7’ screen displays within the form.
- **Q8: My company manufactures (other than imports) mercury compound-added products:** Check the checkbox to indicate that the reporting company manufactures mercury compound-added products. If selected, the ‘Question 8’ screen displays within the form.
- **Q9: My company imports mercury compound-added products:** Check the checkbox to indicate that the reporting company imports mercury compound-added products. If selected, the ‘Question 9’ screen displays within the form.
- **Q10: My company uses mercury compounds in a manufacturing process (other than manufacturing mercury compound-added products):** Check the checkbox to indicate that the reporting company uses mercury compounds in a manufacturing process. If selected, the ‘Question 10’ screen displays within the form.
- **Both:** Select the ‘Both’ radio button to enable the ‘Elemental Mercury’ and ‘Mercury Compounds’ section and the associated questions.

Exhibit 4-12 shows a screen capture of the ‘Introductory Questions’ screen (Scroll 1):

Exhibit 4-12 Introductory Questions Screen (Scroll 1)

Exhibit 4-13 shows a screen capture of the ‘Introductory Questions’ screen (Scroll 2):

Exhibit 4-13 Introductory Questions Screen (Scroll 2)

HOME Jane Doe, TEST ORGANIZATION LLC (Primary Agent/Consultant)

Introductory Questions

Submission Alias

MER-20180614-10:15:54

Please do not include CBI information in the Submission Alias field.

The Mercury Electronic Reporting (MER) rule, under the Toxic Substances Control Act (TSCA), requires any person who manufactures (including imports) mercury or mercury-added products, or otherwise intentionally uses mercury in a manufacturing process to report quantitative and qualitative data to the Environmental Protection Agency. The law defines mercury as meaning elemental mercury and a mercury compound. In accordance with section 8(b) of TSCA, information collected under this reporting application will be used in support of a triennial publication of the supply, uses, and trade of mercury in the United States.

Read the TSCA MER requirements in the Code of Federal Regulations (40 CFR Part ###).

Check all applicable statements

Elemental Mercury

- Q1: My company manufactures (other than imports) elemental mercury
- Q2: My company imports elemental mercury
- Q3: My company manufactures (other than imports) elemental mercury-added products
- Q4: My company imports elemental mercury-added products
- Q5: My company uses elemental mercury in a manufacturing process (other than manufacturing mercury compounds and/or manufacturing elemental mercury-added products)

Mercury Compounds

- Q6: My company manufactures (other than imports) mercury compounds
- Q7: My company imports mercury compounds
- Q8: My company manufactures (other than imports) mercury compound-added products
- Q9: My company imports mercury compound-added products
- Q10: My company uses mercury compounds in a manufacturing process (other than manufacturing mercury compound-added products)

Both

Continue

Next Step: Question 1

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Navigation: Click the ‘Continue’ button to navigate to the question screen that was selected. Question screens generate only upon clicking the ‘Continue’ button.

4.3 Question 1

You can access the ‘Question 1’ screen by checking the ‘Q1’ checkbox and clicking the ‘Continue’ button from the ‘Introductory Questions’ screen. You can also access this screen by clicking the ‘Question 1’ link within the navigation header.

The ‘Question 1’ screen provides fields to capture information regarding the manufacture of elemental mercury.

- **My company reported amount of manufactured mercury in the most recent CDR reporting cycle:** Check the checkbox to indicate that the reporting company reported an amount of mercury in the most recent CDR reporting cycle.
- **CBI:** Check the ‘CBI’ checkbox to claim manufactured mercury in the last CDR reporting cycle as confidential.
- **During the calendar year XXXX, my company manufactured (other than imported) a total of _____ pounds of elemental mercury:** Enter the number of pounds of elemental mercury that has been manufactured during the specified calendar year. The

entered value must be greater than or equal to one, but less than or equal to 1,000,000,000. This is a required field if displayed. This statement does not display if the ‘My company reported amount of manufactured mercury in the most recent CDR reporting cycle’ statement is checked.

- **CBI:** Check the ‘CBI’ checkbox to claim the number of pounds of manufactured elemental mercury as confidential.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of elemental mercury on-site:** Enter a range of elemental mercury that has been stored on-site during the specified calendar year. A minimum and maximum range value is required if the fields are enabled. The entered values must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of manufactured elemental mercury stored on-site as confidential.
- **Check here if not applicable:** Check the checkbox to indicate that elemental mercury is not stored on-site and disable the input fields for the associated question.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of elemental mercury off-site:** Enter a range of elemental mercury that has been stored off-site during the specified calendar year. A minimum and maximum range value is required if the fields are enabled. The entered values must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of manufactured elemental mercury stored off-site as confidential.
- **Check here if not applicable:** Check the checkbox to indicate that manufactured elemental mercury is not stored off-site and disable the input fields for the associated question.
- **During the calendar year XXXX, my company distributed _____ pounds of elemental mercury into domestic commerce:** Enter the amount of elemental mercury that has been distributed into domestic commerce. The entered value must be greater than or equal to zero, but less than or equal to 1,000,000,000. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of elemental mercury distributed into domestic commerce as confidential.
- **Industries of Distribution:** Select the industry(ies) to which elemental mercury has been distributed by selecting the applicable North American Industry Classification System (NAICS) code(s). Use the keyword search on the NAICS website (<https://www.census.gov/eos/www/naics/index.html>) to search for the desired industry. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the industry(ies) of distribution to which elemental mercury has been distributed as confidential.

Exhibit 4-14 shows a screen capture of the ‘Question 1’ screen:

Exhibit 4-14 Question 1 Screen

Navigation: Click the ‘Continue’ button to navigate to the subsequent question screen that was checked or the ‘Summary’ screen if no other questions were checked.

4.4 Question 2

You can access the ‘Question 2’ screen by checking the ‘Q2’ checkbox and clicking the ‘Continue’ button from the ‘Question 1’ screen or the ‘Introductory Questions’ screen. You can also access this screen by clicking the ‘Question 2’ link within the navigation header.

The ‘Question 2’ screen provides fields to capture information regarding importing elemental mercury.

- **My company reported amount of imported mercury in the most recent CDR reporting cycle:** Check the checkbox to indicate that the reporting company reported an amount of imported mercury in the most recent CDR reporting cycle.
- **CBI:** Check the ‘CBI’ checkbox to claim the mercury imported in the most recent CDR reporting cycle as confidential.
- **During the calendar year XXXX, my company imported a total of _____ pounds of elemental mercury:** Enter the amount of elemental mercury that was imported during the specified calendar year. The entered value must be greater than or equal to one, but less than or equal to 1,000,000,000. This is a required field if displayed. This field does not display if

the ‘My company reported amount of imported mercury in the most recent CDR reporting cycle’ statement is checked.

- **CBI:** Check the ‘CBI’ checkbox to claim the amount of imported elemental mercury as confidential.
- **Country of Origin:** Select the country(ies) of origin from which elemental mercury was imported. At least one country of origin is required if the ‘My company reported amount of imported mercury in the most recent CDR reporting cycle’ statement is checked.
- **CBI:** Check the ‘CBI’ checkbox to claim the country(ies) of origin as confidential.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of elemental mercury on-site:** Enter a range of imported elemental mercury that has been stored on-site during the specified calendar year. The entered values must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of imported elemental mercury stored on-site by the reporting company as confidential.
- **Check here if not applicable:** Check the checkbox to indicate that imported elemental mercury is not stored on-site and disable the input fields for the associated question.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of elemental mercury off-site:** Enter a range of imported elemental mercury that has been stored off-site during the specified calendar year. The entered values must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of imported elemental mercury stored off-site as confidential.
- **Check here if not applicable:** Check the checkbox to indicate that imported elemental mercury is not stored off-site and disable the input fields for the associated question.
- **During the calendar year XXXX, my company distributed _____ pounds of elemental mercury into domestic commerce:** Enter the amount of imported elemental mercury that has been distributed into domestic commerce. The entered value must be greater than or equal to zero, but less than or equal to 1,000,000,000. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of imported elemental mercury distributed into domestic commerce as confidential.
- **Industries of Distribution:** Select the industry(ies) to which elemental mercury has been distributed by selecting the applicable North American Industry Classification System (NAICS) code(s). Use the keyword search on the NAICS website (<https://www.census.gov/eos/www/naics/index.html>) to search for the desired industry. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the industry(ies) of distribution as confidential.

Exhibit 4 -15 shows a screen capture of the ‘Question 2’ screen:

Exhibit 4-15 Question 2 Screen

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Jane Doe, TEST ORGANIZATION LLC (Primary Agent/Consultant)

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Introductory Questions	Question 1	Question 2	Question 3	Question 4	Question 5
Question 6	Question 7	Question 8	Question 9	Question 10	Summary

Submitting Official Information

Q2. My company imports elemental mercury

My company reported amount of imported mercury in the most recent CDR reporting cycle. CBI

During the calendar year 2018, my company imported a total of pounds of elemental mercury. CBI

Country of Origin CBI

During the calendar year 2018, my company stored between and pounds of elemental mercury on-site. CBI

Check here if not applicable.

During the calendar year 2018, my company stored between and pounds of elemental mercury off-site. CBI

Check here if not applicable.

During the calendar year 2018, my company distributed pounds of elemental mercury into domestic commerce. CBI

Industries of Distribution: CBI

Previous

Continue

Next Step: Question 3

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CDX Links
CDX Helpline: (888) 890-1995

Navigation: Click the ‘Continue’ button to navigate to the subsequent screen that was checked on the ‘Introductory Questions’ screen or the ‘Summary’ screen.

4.5 Question 3

You can access the ‘Question 3’ screen by checking the ‘Q3’ checkbox and clicking the ‘Continue’ button from the ‘Question 2’ screen or the ‘Introductory Questions’ screen. You can also access this screen by clicking the ‘Question 3’ link within the navigation header.

The ‘Question 3’ screen provides fields to capture information regarding manufacturing (other than imports) elemental mercury-added products.

- **My company reported national sales data to the most recent IMERC reporting cycle:** Check the checkbox to indicate that the reporting company reported national sales data to the most recent IMERC reporting cycle.
- **CBI:** Check the ‘CBI’ checkbox to indicate that the national sales data of manufactured elemental mercury-added products reported to the most recent IMERC reporting cycle is claimed as confidential.
- **During the calendar year XXXX, my company used a total of _____ pounds of elemental mercury in manufacturing elemental mercury-added products:** Enter the amount of elemental mercury that was used in manufacturing elemental mercury-added


products during the specified calendar year. The entered value must be greater than or equal to one, but less than or equal to 1,000,000,000. This is a required field.

- **CBI:** Check the ‘CBI’ checkbox to claim the amount of elemental mercury used in manufacturing elemental mercury-added products as confidential.
- **During the calendar year XXXX, my company manufactured (other than imported) the following elemental mercury added products:** Select the category(ies) and associated subcategory(ies) to which the reporting company manufactured elemental mercury-added products. At least one category must be checked.
 - The ‘Batteries’ category includes the following subcategories: ‘Button cell (silver),’ ‘Button cell (zinc-air),’ ‘Button cell (alkaline),’ ‘Stacked button cell batteries,’ ‘Manganese oxide,’ ‘Silver oxide,’ ‘Mercuric oxide (non-button cell),’ ‘Button cell (mercuric oxide),’ ‘Button cell (zinc carbon),’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘batteries’ category and associated subcategory(ies) as confidential.
 - The ‘Dental amalgam’ category does not include any subcategories.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘dental amalgam’ category as confidential.
 - The ‘Formulated products (includes uses in cosmetics, pesticides, and laboratory chemicals)’ category includes the following subcategories: ‘Skin-lightening creams,’ ‘Lotions,’ ‘Soaps and sanitizers,’ ‘Bath oils and salts,’ ‘Preservatives (e.g. for use in vaccines for preservation),’ ‘Pharmaceuticals (including prescription and over-the-counter products),’ ‘Cleaning products (not registered as pesticides under the Federal Insecticide, Fungicide, and Rodenticide Act),’ ‘Pesticides,’ ‘Paints,’ ‘Dyes,’ ‘Reagents (e.g., catalysts, buffers, fixatives),’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘formulated products’ category and associated subcategory(ies) as confidential.
 - The ‘Lighting, lamps, bulbs’ category includes the following subcategories: ‘Linear fluorescent,’ ‘Compact fluorescent,’ ‘U-tube and circular fluorescent,’ ‘Cold cathode fluorescent,’ ‘External electrode fluorescent,’ ‘Mercury vapor,’ ‘Metal halide,’ ‘High pressure sodium,’ ‘Mercury short arc,’ ‘Neon,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘Lighting, lamps, and bulbs’ category and associated subcategory(ies) as confidential.
 - The ‘Measuring instruments’ category includes the following subcategories: ‘Barometer,’ ‘Fever thermometer,’ ‘Flow meter,’ ‘Hydrometer,’ ‘Hygrometer/psychrometer,’ ‘Manometer,’ ‘Non-fever thermometer,’ ‘Pyrometer,’ ‘Sphygmomanometer,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the measuring instruments category and associated subcategory(ies) as confidential.
 - The ‘Pump seals’ category does not include any subcategories.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘pump seals’ category as confidential.

- The ‘Switches, relays, sensors, valves’ category includes the following subcategories: ‘Tilt switch,’ ‘Vibration switch,’ ‘Float switch,’ ‘Pressure switch,’ ‘Temperature switch,’ ‘Displacement relay,’ ‘Wetted reed relay,’ ‘Contact relay,’ ‘Flame sensor,’ ‘Thermostat,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘switches, relays, sensors, and valves’ category and associated subcategory(ies) as confidential.
- The ‘Miscellaneous/novelty mercury-added products’ category includes the following subcategories: ‘Wheel weights,’ ‘Wheel rotation balancers/stabilizers,’ ‘Firearm recoil suppressors,’ ‘Carburetor synchronizers,’ ‘Joint support/shock absorption bands,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘miscellaneous/novelty mercury-added products’ category and associated subcategory(ies) as confidential.
- **During the calendar year XXXX, my company distributed _____ pounds of elemental mercury in products into domestic commerce:** Enter the amount of elemental mercury in products that has been distributed into domestic commerce. The entered value must be greater than or equal to zero, but less than or equal to 1,000,000,000. This question does not display if the ‘My company reported national sales data to the most recent IMERC reporting cycle’ statement is checked. This is a required field if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the amount of elemental mercury in products that has been distributed into domestic commerce as confidential.
 - **Industries of Distribution:** Select the industry(ies) of distribution to which elemental mercury in products have been distributed by selecting the applicable North American Industry Classification System (NAICS) code(s). Use the keyword search on the NAICS website (<https://www.census.gov/eos/www/naics/index.html>) to search for the desired industry. This is a required field.
 - CBI: Check the ‘CBI’ checkbox to claim the industry(ies) to which elemental mercury in products is distributed as confidential.
- **During the calendar year XXXX, my company exported _____ pounds of elemental mercury in mercury-added products:** Enter the amount of elemental mercury in mercury-added products that the reporting company has exported. The entered value must be greater than or equal to zero, but less than or equal to 1,000,000,000. This is a required field.
 - CBI: Check the ‘CBI’ checkbox to claim the amount of elemental mercury in mercury-added products that has been exported as confidential.
 - **Destination Country:** Select the destination country(ies) to which the reporting company exports elemental mercury in mercury-added products. At least one country must be selected.
 - CBI: Check the ‘CBI’ checkbox to claim the destination country(ies) to which elemental mercury in mercury-added products is exported as confidential.

Exhibit 4-16 shows a screen capture of the ‘Question 3’ screen (Scroll 1):

Exhibit 4-16 Question 3 Screen (Scroll 1)

 **HOME** Jane Doe, TEST ORGANIZATION LLC (Primary Agent/Consultant)

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Introductory Questions	Question 1	Question 2	Question 3	Question 4	Question 5
Question 6	Question 7	Question 8	Question 9	Question 10	Summary

Submitting Official Information

Q3. My company manufactures (other than imports) elemental mercury-added products

My company reported national sales data to the most recent IMERC reporting cycle. CBI

During the calendar year 2018, my company used a total of pounds of elemental mercury in manufacturing elemental mercury-added products. CBI

During the calendar year 2018, my company manufactured (other than imported) the following elemental mercury added products:

Category	Subcategory	CBI
<input checked="" type="checkbox"/> Batteries	Button cell, alkaline ▼	<input type="checkbox"/> CBI
<input type="checkbox"/> Dental amalgam		
<input type="checkbox"/> Formulated products (includes uses in cosmetics, pesticides, and laboratory chemicals)		
<input type="checkbox"/> Lighting, lamps, bulbs		
<input type="checkbox"/> Measuring instruments		
<input type="checkbox"/> Pump seals		
<input type="checkbox"/> Switches, relays, sensors, valves		
<input type="checkbox"/> Miscellaneous/novelty mercury-added products		

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Exhibit 4-17 shows a screen capture of the ‘Question 3’ screen (Scroll 2):

Exhibit 4-17 Question 3 Screen (Scroll 2)

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Jane Doe, TEST ORGANIZATION LLC (Primary Agent/Consultant)

Category	Subcategory
<input checked="" type="checkbox"/> Batteries	Button cell, alkaline <input type="checkbox"/> CBI
<input type="checkbox"/> Dental amalgam	
<input type="checkbox"/> Formulated products (includes uses in cosmetics, pesticides, and laboratory chemicals)	
<input type="checkbox"/> Lighting, lamps, bulbs	
<input type="checkbox"/> Measuring instruments	
<input type="checkbox"/> Pump seals	
<input type="checkbox"/> Switches, relays, sensors, valves	
<input type="checkbox"/> Miscellaneous/novelty mercury-added products	

During the calendar year 2018, my company distributed pounds of elemental mercury in products into domestic commerce. CBI

Industries of Distribution: CBI

During the calendar year 2018, my company exported pounds of elemental mercury in mercury-added products. CBI

Destination Country: CBI

Next Step: Question 4

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Raise a Bug CDX Links CDX Helpline: (888) 890-1995

Navigation: Click the ‘Continue’ button to navigate to the subsequent question screen that was checked on the ‘Introductory Questions’ screen or the ‘Summary’ screen.

4.6 Question 4

You can access the ‘Question 4’ screen by checking the ‘Q4’ checkbox and clicking the ‘Continue’ button from the ‘Question 3’ screen or the ‘Introductory Questions’ screen. You can also access this screen by clicking the ‘Question 4’ link within the navigation header.

The ‘Question 4’ screen provides fields to capture information regarding importing elemental mercury-added products.

- **My company reported national sales data to the most recent IMERC reporting cycle:** Check the checkbox to indicate that the reporting company has reported national sales data to the most recent IMERC reporting cycle.
- **CBI:** Check the ‘CBI’ checkbox to claim the national sales data reported to the most recent IMERC reporting cycle as confidential.
- **During the calendar year XXXX, my company imported a total of _____ pounds of elemental mercury in mercury-added products:** Enter the amount of elemental mercury in mercury-added products that the reporting company has imported. The entered value must


be greater than or equal to one, but less than or equal to 1,000,000,000. This is a required field.

- **CBI:** Check the ‘CBI’ checkbox to claim the amount of imported elemental mercury in mercury-added products as confidential.
- **During the calendar year XXXX, my company imported the following elemental mercury added products:** Select the category(ies) and subcategory(ies) of imported elemental mercury-added products. At least one category must be checked.
 - The ‘Batteries’ category includes the following subcategories: ‘Button cell (silver),’ ‘Button cell (zinc-air),’ ‘Button cell (alkaline),’ ‘Stacked button cell batteries,’ ‘Manganese oxide,’ ‘Silver oxide,’ ‘Mercuric oxide (non-button cell),’ ‘Button cell (mercuric oxide),’ ‘Button cell (zinc carbon),’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘batteries’ category and associated subcategory(ies) as confidential.
 - The ‘Dental amalgam’ category does not include any subcategories.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘dental amalgam’ category as confidential.
 - The ‘Formulated products (includes uses in cosmetics, pesticides, and laboratory chemicals)’ category includes the following subcategories: ‘Skin-lightening creams,’ ‘Lotions,’ ‘Soaps and sanitizers,’ ‘Bath oils and salts,’ ‘Preservatives (e.g. for use in vaccines for preservation),’ ‘Pharmaceuticals (including prescription and over-the-counter products),’ ‘Cleaning products (not registered as pesticides under the Federal Insecticide, Fungicide, and Rodenticide Act),’ ‘Pesticides,’ ‘Paints,’ ‘Dyes,’ ‘Reagents (e.g., catalysts, buffers, fixatives),’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘Formulated products (includes uses in cosmetics, pesticides, and laboratory chemicals)’ category and associated subcategory(ies) as confidential.
 - The ‘Lighting, lamps, bulbs’ category includes the following subcategories: ‘Linear fluorescent,’ ‘Compact fluorescent,’ ‘U-tube and circular fluorescent,’ ‘Cold cathode fluorescent,’ ‘External electrode fluorescent,’ ‘Mercury vapor,’ ‘Metal halide,’ ‘High pressure sodium,’ ‘Mercury short arc,’ ‘Neon,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘Lighting, lamps, and bulbs’ category and associated subcategory(ies) as confidential.
 - The ‘Measuring instruments’ category includes the following subcategories: ‘Barometer,’ ‘Fever thermometer,’ ‘Flow meter,’ ‘Hydrometer,’ ‘Hygrometer/psychrometer,’ ‘Manometer,’ ‘Non-fever thermometer,’ ‘Pyrometer,’ ‘Sphygmomanometer,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘measuring instruments’ and associated subcategory(ies) as confidential.
 - The ‘Pump seals’ category does not include any subcategories.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘pump seals’ category as confidential.

- The ‘Switches, relays, sensors, valves’ category includes the following subcategories: ‘Tilt switch,’ ‘Vibration switch,’ ‘Float switch,’ ‘Pressure switch,’ ‘Temperature switch,’ ‘Displacement relay,’ ‘Wetted reed relay,’ ‘Contact relay,’ ‘Flame sensor,’ ‘Thermostat,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘switches, relays, sensors, and valves’ category and associated subcategory(ies) as confidential.
- The ‘Miscellaneous/novelty mercury-added products’ category includes the following subcategories: ‘Wheel weights,’ ‘Wheel rotation balancers/stabilizers,’ ‘Firearm recoil suppressors,’ ‘Carburetor synchronizers,’ ‘Joint support/shock absorption bands,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘miscellaneous/novelty mercury-added products’ category and associated subcategory(ies) as confidential.
- **Country of Origin:** Select the country(ies) of origin from which the reporting company imports elemental mercury-added products. At least one value must be selected.
- **CBI:** Check the ‘CBI’ checkbox to claim the country(ies) of origin as confidential.
- **During the calendar year XXXX, my company distributed _____ pounds of elemental mercury in products into domestic commerce:** Enter the amount of elemental mercury that has been distributed in products into domestic commerce. The entered value must be greater than or equal to zero, but less than or equal to 1,000,000,000. This question does not display if the ‘My company reported national sales data to the most recent IMERC reporting cycle’ statement is checked. This is a required field if displayed.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of elemental mercury distributed in products into domestic commerce as confidential.
- **Industries of Distribution:** Select the industries to which elemental mercury in products has been distributed into domestic commerce by selecting the applicable North American Industry Classification System (NAICS) code(s). Use the keyword search on the NAICS website (<https://www.census.gov/eos/www/naics/index.html>) to search for the desired industry.
- **CBI:** Check the ‘CBI’ checkbox to claim the industries of distribution as confidential.
- **During the calendar year XXXX, my company exported _____ pounds of elemental mercury in mercury-added products:** Enter the amount of elemental mercury in mercury-added products that has been exported. The entered value must be greater than or equal to zero, but less than or equal to 1,000,000,000. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of elemental mercury exported in mercury-added products as confidential.
- **Destination Country:** Select the country(ies) to which the reporting company exports elemental mercury in mercury-added products. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the destination country(ies) as confidential.

Exhibit 4-18 shows a screen capture of the ‘Question 4’ screen (Scroll 1):

Exhibit 4-18 Question 4 Screen (Scroll 1)

 **HOME** Jane Doe, TEST ORGANIZATION LLC (Primary Agent/Consultant)

Mercury Electronic Reporting ▶ MER-20180614-10:15:54

Introductory Questions	Question 1	Question 2	Question 3	Question 4	Question 5
Question 6	Question 7	Question 8	Question 9	Question 10	Summary

Submitting Official Information

Q4. My company imports elemental mercury-added products

My company reported national sales data to the most recent IMERC reporting cycle CBI
During the calendar year 2018, my company imported a total of pounds of elemental mercury in mercury-added products. CBI
During the calendar year 2018, my company imported the following elemental mercury added products:

Category	Subcategory
<input type="checkbox"/> Batteries	
<input checked="" type="checkbox"/> Dental amalgam	<input type="checkbox"/> CBI
<input type="checkbox"/> Formulated products (includes uses in cosmetics, pesticides, and laboratory chemicals)	
<input type="checkbox"/> Lighting, lamps, bulbs	
<input type="checkbox"/> Measuring instruments	
<input type="checkbox"/> Pump seals	
<input type="checkbox"/> Switches, relays, sensors, valves	
<input type="checkbox"/> Miscellaneous/novelty mercury-added products	

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Exhibit 4-19 shows a screen capture of the ‘Question 4’ screen (Scroll 2):

Exhibit 4-19 Question 4 Screen (Scroll 2)

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Jane Doe, TEST ORGANIZATION LLC (Primary Agent/Consultant)

Dental amalgam

CBI

Formulated products
(includes uses in cosmetics, pesticides, and laboratory chemicals)

Lighting, lamps, bulbs

Measuring instruments

Pump seals

Switches, relays, sensors, valves

Miscellaneous/novelty mercury-added products

Country of Origin

None selected ▾

During the calendar year 2018, my company distributed pounds of elemental mercury in products into domestic commerce.

Industries of Distribution:

None selected ▾

During the calendar year 2018, my company exported pounds of elemental mercury in mercury-added products.

Destination Country

None selected ▾

CBI

 CBI

 CBI

 CBI

Previous

Continue

Next Step: Question 5

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Navigation: Click the ‘Continue’ button to navigate to the subsequent screen that was checked on the ‘Introductory Questions’ screen or the ‘Summary’ screen.

4.7 Question 5

You can access the ‘Question 5’ screen by checking the ‘Q5’ checkbox and clicking the ‘Continue’ button from the ‘Question 4’ screen or the ‘Introductory Questions’ screen. You can also access this screen by clicking the ‘Question 5’ link within the navigation header.

The ‘Question 5’ screen provides fields to capture information regarding the use of elemental mercury in a manufacturing process (separate from manufacturing mercury compounds and/or manufacturing elemental mercury-added products).

- **During the calendar year XXXX, my company used a total of _____ pounds of elemental mercury in a manufacturing process:** Enter the amount of elemental mercury used in a manufacturing process. The entered value must be greater than or equal to one, but less than or equal to 1,000,000,000. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of elemental mercury used in a manufacturing process as confidential.

- **During the calendar year XXXX, my company used elemental mercury in a manufacturing process in the following capacity for the following purposes:** Check the processes in which elemental mercury is used. At least one process must be selected.
- **CBI:** Check the CBI' checkbox to claim elemental mercury used in (a) manufacturing process(es) as confidential.
- The 'Process' column displays the following values: 'Chlorine production (e.g., mercury-cell chlor-alkali process),' 'Acetaldehyde production,' 'Sodium/potassium methylate/ethylate production,' 'Polyurethane/plastic production,' and 'Other (please specify).' Enter a value into the 'Other' text field if 'Other' is checked. At least one process is required to be checked.
- **CBI:** Check the 'CBI' checkbox to claim the associated process as confidential.
- The 'Use' drop-down contains the following values: 'Catalyst,' 'Reactant,' 'Reagent,' 'Cathode,' and 'Other.' A use is required for each checked process.
 - Other: A text field displays when 'Other' is selected to capture the use description.
- **CBI:** Check the 'CBI' checkbox to claim the associated use(s) as confidential.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of elemental mercury on-site:** Enter a range to estimate the amount of elemental mercury that is stored on-site. The entered values must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.
- **CBI:** Check the 'CBI' checkbox to claim the amount of elemental mercury stored on-site as confidential.
- **Check here if not applicable:** Check the checkbox to disable the input fields and indicate that elemental mercury is not stored on-site for the purpose of a manufacturing process.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of elemental mercury off-site:** Enter a range to estimate the amount of elemental mercury that is stored off-site for use in a manufacturing process. The entered values must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.
- **CBI:** Check the 'CBI' checkbox to claim the amount of elemental mercury stored off-site for use in a manufacturing process as confidential.
- **Check here if not applicable:** Check the checkbox to indicate that elemental mercury is not stored off-site for the purpose of a manufacturing process and disable the input fields for the associated question.
- **Industries of Distribution:** Select the industry(ies) of distribution to which final products that may or may not contain elemental mercury have been distributed by selecting the applicable North American Industry Classification System (NAICS) code(s). Use the keyword search on the NAICS website (<https://www.census.gov/eos/www/naics/index.html>) to search for the desired industry.
- **CBI:** Check the 'CBI' checkbox to claim the selected industries of distribution as confidential.

- **Destination Country:** Select the country(ies) to which the reporting company exports final products that may or may not contain detectable amounts of elemental mercury as a result of a manufacturing process. Select the ‘Not Applicable’ option to indicate that final products containing elemental mercury are not exported to any countries.
- **CBI:** Check the ‘CBI’ checkbox to claim the countries to which the reporting company exports final products that may or may not contain elemental mercury as confidential.

Exhibit 4 -20 shows a screen capture of the ‘Question 5’ screen (Scroll 1):

Exhibit 4-20 Question 5 Screen (Scroll 1)

HOME Jane Doe, TEST ORGANIZATION LLC (Primary Agent/Consultant)

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Introductory Questions **Question 1** Question 2 Question 3 Question 4 **Question 5**

Question 6 Question 7 Question 8 Question 9 Question 10 Summary

Submitting Official Information

Q5. My company uses elemental mercury in a manufacturing process (other than manufacturing mercury compounds and/or manufacturing elemental mercury-added products)

During the calendar year 2018, my company used a total of pounds of elemental mercury in a manufacturing process. CBI

During the calendar year 2018, my company used elemental mercury in a manufacturing process in the following capacity for the following purposes: CBI

Process	Use	CBI
<input checked="" type="checkbox"/> Chlorine production (e.g., mercury-cell chlor-alkali process)	<input type="checkbox"/> Catalyst <input type="text" value="Catalyst"/>	<input type="checkbox"/> CBI
<input checked="" type="checkbox"/> Acetaldehyde production	<input type="checkbox"/> Reactant <input type="text" value="Reactant"/>	<input type="checkbox"/> CBI
<input checked="" type="checkbox"/> Sodium/potassium methylate/ethylate production	<input type="checkbox"/> Reagent <input type="text" value="Reagent"/>	<input type="checkbox"/> CBI
<input checked="" type="checkbox"/> Polyurethane/plastic production	<input type="checkbox"/> Cathode <input type="text" value="Cathode"/>	<input type="checkbox"/> CBI
<input type="checkbox"/> Other (please specify) <input type="text" value=""/>	<input type="checkbox"/> <input type="text" value=""/>	<input type="checkbox"/> CBI

During the calendar year 2018, my company stored between and pounds of elemental mercury on-site. CBI
Check here if not applicable.

During the calendar year 2018, my company stored between and pounds of elemental mercury off-site. CBI
Check here if not applicable.

During the calendar year 2018, my company distributed into domestic commerce final products that may or may not contain detectable amounts of elemental mercury as a result of a manufacturing process to the following Industries of Distribution: CBI

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Exhibit 4 -21 shows a screen capture of the ‘Question 5’ screen (Scroll 2):

Exhibit 4-21 Question 5 Screen (Scroll 2)

The screenshot shows a web application interface for mercury reporting. At the top, there is a navigation bar with a 'HOME' button and a user profile for 'Jane Doe, TEST ORGANIZATION LLC (Primary Agent/Consultant)'. The main content area contains several sections:

- Elemental Mercury Usage:** A text input field for 'pounds of elemental mercury in a manufacturing process' with a 'CBI' checkbox.
- Manufacturing Capacity:** A text input field for 'pounds of elemental mercury in a manufacturing process in the following capacity' with a 'CBI' checkbox.
- Process and Use:** A table with two columns: 'Process' and 'Use'.

Process	Use
<input checked="" type="checkbox"/> Chlorine production (e.g., mercury-cell chlor-alkali process)	<input type="checkbox"/> Catalyst
<input checked="" type="checkbox"/> Acetaldehyde production	<input type="checkbox"/> Reactant
<input checked="" type="checkbox"/> Sodium/potassium methylate/ethylate production	<input type="checkbox"/> Reagent
<input checked="" type="checkbox"/> Polyurethane/plastic production	<input type="checkbox"/> Cathode
<input type="checkbox"/> Other (please specify)	<input type="checkbox"/>
- On-site Storage:** Two text input fields for 'pounds of elemental mercury on-site' with 'CBI' checkboxes and a 'Check here if not applicable' checkbox.
- Off-site Storage:** Two text input fields for 'pounds of elemental mercury off-site' with 'CBI' checkboxes and a 'Check here if not applicable' checkbox.
- Industries of Distribution:** A dropdown menu with 'None selected' and a 'CBI' checkbox.
- Destination Country:** A dropdown menu with 'None selected' and a 'CBI' checkbox.

At the bottom of the form, there are 'Previous' and 'Continue' buttons. The 'Continue' button is highlighted with a red border. Below the buttons, it says 'Next Step: Question 6'. The footer of the application includes 'Save', 'Preview', 'Validate', 'Raise a Bug', 'CDX Links', and 'CDX Helpline: (888) 890-1995'.

Navigation: Click the ‘Continue’ button to navigate to the subsequent screen that was checked on the ‘Introductory Questions’ screen or the ‘Summary’ screen.

4.8 Question 6

You can access the ‘Question 6’ screen by checking the ‘Q6’ checkbox and clicking the ‘Continue’ button from the ‘Question 5’ screen or the ‘Introductory Questions’ screen. You can also access this screen by clicking the ‘Question 6’ link within the navigation header.

The ‘Question 6’ screen provides fields to capture information regarding the manufacture of mercury compounds.

- **My company reported amount of manufactured (other than imported) mercury compounds in the most recent CDR reporting cycle:** Check the checkbox to indicate that the reporting company reported an amount of manufactured mercury compounds during the most recent CDR reporting cycle.
- **CBI:** Check the ‘CBI’ checkbox to claim that the amount of manufactured mercury compounds in the most recent CDR reporting cycle is confidential.
- **During the calendar year XXXX, my company manufactured (other than imported) a total of _____ pounds of mercury compounds:** Enter the amount of mercury


compounds that the reporting company has manufactured. The entered value must be greater than or equal to one, but less than or equal to 1,000,000,000. This question does not display if the ‘My company reported amount of manufactured (other than imported) mercury compounds in the most recent CDR reporting cycle’ statement is checked. This is a required field if displayed.

- **CBI:** Check the ‘CBI’ checkbox to claim the amount of mercury compounds which has been manufactured as confidential.
- **During the calendar year XXXX, my company manufactured the following mercury compounds:** Select the mercury compound(s) which the reporting company has manufactured during the specified calendar year. This question does not display if the ‘My company reported amount of manufactured (other than imported) mercury compounds in the most recent CDR reporting cycle’ statement is checked. This is a required field if displayed.
- **During the calendar year XXXX, my company used a total of _____ pounds of elemental mercury to manufacture mercury compounds:** Enter the amount of elemental mercury that was used to manufacture mercury compounds. The entered value must be greater than or equal to zero, but less than or equal to 1,000,000,000. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of elemental mercury used to manufacture mercury compounds as confidential.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of elemental mercury on-site:** Enter a range to estimate the amount of elemental mercury stored on-site. The entered values must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.
- **CBI:** Check the ‘CBI’ checkbox to claim the range of elemental mercury that is stored on-site as confidential.
- **Check here if not applicable:** Check the checkbox to disable the input fields and claim that elemental mercury is not stored on-site.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of elemental mercury off-site:** Enter a range to estimate the amount of elemental mercury that is stored off-site. The entered values must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of elemental mercury stored off-site as confidential.
- **Check here if not applicable:** Check the checkbox to disable the input fields and claim that elemental mercury is not stored off-site as not applicable.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of mercury compounds on-site:** Enter a range to estimate the amount of mercury compounds stored on-site. The entered values must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.

- **CBI:** Check the ‘CBI’ checkbox to claim the amount of mercury compounds stored on-site as confidential.
- **Check here if not applicable:** Check the checkbox to disable the input fields and claim that mercury compounds are not stored on-site.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of mercury compounds off-site:** Enter a range to estimate the amount of mercury compounds stored off-site. The entered values must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of mercury compounds stored off-site as confidential.
- **Check here if not applicable:** Check the checkbox to disable the input fields and claim that mercury compounds are not stored off-site as not applicable.
- **During the calendar year XXXX, my company distributed _____ pounds of mercury compounds into domestic commerce:** Enter the amount of mercury compounds which has been distributed into domestic commerce. The entered value must be greater than or equal to zero, but less than or equal to 1,000,000,000. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of mercury compounds distributed into domestic commerce as confidential.
- **Industries of Distribution:** Select the industry(ies) to which mercury compounds have been distributed by selecting the applicable North American Industry Classification System (NAICS) code(s). Use the keyword search on the NAICS website (<https://www.census.gov/eos/www/naics/index.html>) to search for the desired industry. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the industries of distribution as confidential.
- **During calendar year XXXX, my company exported _____ pounds of mercury compounds:** Enter the amount of mercury compounds which the reporting company has exported to the specified country(ies). The entered value must be greater than or equal to zero, but less than or equal to 1,000,000,000. This question does not display if the ‘My company reported amount of manufactured (other than imported) mercury compounds in the most recent CDR reporting cycle’ statement is checked. This is a required field if displayed.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of mercury compounds exported to specific country(ies) as confidential.
- **Destination Country:** Select the destination country(ies) to which the reporting company exports mercury compounds. Select the ‘Not Applicable’ value to indicate that the reporting company does not export mercury compounds to other country(ies).
- **CBI:** Check the ‘CBI’ checkbox to claim the destination country(ies) as confidential.

Exhibit 4 -22 shows a screen capture of the ‘Question 6’ screen (Scroll 1):

Exhibit 4-22 Question 6 Screen (Scroll 1)

 HOME Jane Doe, TEST ORGANIZATION LLC (Primary Agent/Consultant)

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Introductory Questions	Question 1	Question 2	Question 3	Question 4	Question 5
Question 6	Question 7	Question 8	Question 9	Question 10	Summary

Submitting Official Information

Q6. My company manufactures (other than imports) mercury compounds

My company reported amount of manufactured (other than imported) mercury compounds in the most recent CDR reporting cycle. CBI

During the calendar year 2018, my company manufactured (other than imported) a total of pounds of mercury compounds. CBI

During the calendar year 2018, my company manufactured the following mercury compounds:
Check all that apply.

During the calendar year 2018, my company used a total of pounds of elemental mercury to manufacture mercury compounds. CBI

During the calendar year 2018, my company stored between and pounds of elemental mercury on-site. CBI
Check here if not applicable.

During the calendar year 2018, my company stored between and pounds of elemental mercury off-site. CBI
Check here if not applicable.

During the calendar year 2018, my company stored between and pounds of mercury compounds on-site. CBI
Check here if not applicable.

During the calendar year 2018, my company stored between and pounds of mercury compounds off-site. CBI
Check here if not applicable.

During the calendar year 2018, my company distributed pounds of mercury compounds into domestic commerce. CBI

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Exhibit 4-23 shows a screen capture of the ‘Question 6’ screen (Scroll 2):

Exhibit 4-23 Question 6 Screen (Scroll 2)

HOME
Jane Doe, TEST ORGANIZATION LLC (Primary Agent/Consultant)

My company reported amount of manufactured (other than imported) mercury compounds in the most recent CDR reporting cycle. CBI

During the calendar year 2018, my company manufactured (other than imported) a total of pounds of mercury compounds. CBI

During the calendar year 2018, my company manufactured the following mercury compounds:

Check all that apply.

During the calendar year 2018, my company used a total of pounds of elemental mercury to manufacture mercury compounds. CBI

During the calendar year 2018, my company stored between and pounds of elemental mercury on-site. CBI

Check here if not applicable.

During the calendar year 2018, my company stored between and pounds of elemental mercury off-site. CBI

Check here if not applicable.

During the calendar year 2018, my company stored between and pounds of mercury compounds on-site. CBI

Check here if not applicable.

During the calendar year 2018, my company stored between and pounds of mercury compounds off-site. CBI

Check here if not applicable.

During the calendar year 2018, my company distributed pounds of mercury compounds into domestic commerce. CBI

Industries of Distribution: CBI

During calendar year 2018, my company exported pounds of mercury compounds. CBI

Destination Country CBI

Next Step: Question 7

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Navigation: Click the ‘Continue’ button to navigate to the subsequent screen that was checked on the ‘Introductory Questions’ screen or the ‘Summary’ screen.

4.9 Question 7

You can access the ‘Question 7’ screen by checking the ‘Q7’ checkbox and clicking the ‘Continue’ button from the ‘Question 6’ or the ‘Introductory Questions’ screen. You can also access this screen by clicking the ‘Question 7’ link within the navigation header.

The ‘Question 7’ screen provides fields to capture information regarding the import of mercury compounds.

- **My company reported amount of imported mercury compounds in the most recent CDR reporting cycle:** Check the checkbox to indicate that the reporting company reported an amount of imported mercury compounds during the most recent CDR reporting cycle.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of imported mercury compounds reported in the most recent CDR reporting cycle as confidential.
- **During the calendar year XXXX, my company imported a total of _____ pounds of mercury compounds:** Enter the amount of mercury compounds that the reporting company has imported during the specified calendar year. The entered value must be greater than or equal to one, but less than or equal to 1,000,000,000. This question does not display if

the ‘My company reported amount of imported mercury compounds in the most recent CDR reporting cycle’ statement is checked. This is a required field if displayed.

- **CBI:** Check the ‘CBI’ checkbox to claim the amount of imported mercury compounds as confidential.
- **During the calendar year XXXX, my company imported the following mercury compounds:** Select the mercury compound(s) that the company has imported. This question does not display if the ‘My company reported amount of imported mercury compounds in the most recent CDR reporting cycle’ statement is checked. This is a required field if displayed.
- **Country of Origin:** Select the country(ies) from which the reporting company imported mercury compounds. At least one country of origin is required.
- **CBI:** Check the ‘CBI’ checkbox to claim the country(ies) of origin as confidential.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of mercury compounds on-site:** Enter a range to estimate the amount of imported mercury compounds stored on-site. The entered values must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of imported mercury compounds stored on-site as confidential.
- **Check here if not applicable:** Check the checkbox to disable the input fields and claim that imported mercury compounds are not stored on-site.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of mercury compounds off-site:** Enter a range to estimate the amount of imported mercury compounds stored off-site. The entered values must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of imported mercury compounds stored off-site as confidential.
- **Check here if not applicable:** Check the checkbox to disable the input fields and claim that imported mercury compounds are not stored off-site.
- **During the calendar year XXXX, my company distributed _____ pounds of mercury compounds into domestic commerce:** Enter the amount of imported mercury compounds which has been distributed into domestic commerce. The entered value must be greater than or equal to zero, but less than or equal to 1,000,000,000. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of imported mercury compounds distributed into domestic commerce as confidential.
- **Industries of Distribution:** Select the industry(ies) of distribution to which the reporting company distributes imported mercury compounds by selecting the applicable North American Industry Classification System (NAICS) code(s). Use the keyword search on the NAICS website (<https://www.census.gov/eos/www/naics/index.html>) to search for the desired industry. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the industries of distribution as confidential.

- **During the calendar year XXXX, my company exported _____ pounds of mercury compounds:** Enter the amount of imported mercury compounds that the reporting company has exported to the specified destination country. The entered value must be greater than or equal to zero, but less than or equal to 1,000,000,000. This question does not display if the ‘My company reported amount of imported mercury compounds in the most recent CDR reporting cycle’ statement is checked. This is a required field if displayed.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of imported mercury compounds that the reporting company has exported to the specified destination country as confidential.
- **Destination Country:** Select the destination country(ies) to which the company has exported mercury compounds. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the destination country(ies) to which the reporting company exports imported mercury compounds as confidential.

Exhibit 4-24 shows a screen capture of the ‘Question 7’ screen (Scroll 1):

Exhibit 4-24 Question 7 Screen (Scroll 1)

Exhibit 4-25 shows a screen capture of the ‘Question 7’ screen (Scroll 2):

Exhibit 4-25 Question 7 Screen (Scroll 2)

Navigation: Click the ‘Continue’ button to navigate to the subsequent screen that was checked on the ‘Introductory Questions’ screen or the ‘Summary’ screen.

4.10 Question 8

You can access the ‘Question 8’ screen by checking the ‘Q8’ checkbox on the ‘Introductory Questions’ screen and clicking the ‘Continue’ button from the ‘Question 7’ screen or the ‘Introductory Questions’ screen. You can also access this screen by clicking the ‘Question 8’ link within the navigation header.

The ‘Question 8’ screen provides fields to capture information regarding the manufacture (other than imports) of mercury compound-added products.

- **My company reported national sales data to the most recent IMERC reporting cycle:** Check the checkbox to indicate that the reporting company reported national sales data regarding the manufacture of mercury compound-added products to the most recent IMERC reporting cycle.
- **CBI:** Check the ‘CBI’ checkbox to claim the national sales data regarding the manufacture of mercury compound-added products as confidential.

- **During the calendar year XXXX, my company used a total of _____ pounds of elemental mercury in the manufacturing of mercury compound-added products:** Enter the amount of elemental mercury used during the specified calendar year in the manufacture of mercury compound-added products. The entered value must be greater than or equal to one, but less than or equal to 1,000,000,000. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of elemental mercury used in the manufacturing of mercury compound-added products as confidential.
- **During the calendar year XXXX, my company used a total of _____ pounds of mercury compounds in the manufacturing of mercury compound-added products:** Enter the amount of mercury compounds used in the manufacture of mercury compound-added products during the specified calendar year. The entered value must be greater than or equal to one, but less than or equal to 1,000,000,000. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of mercury compounds used in the manufacturing of mercury compound-added products as confidential.
- **During the calendar year XXXX, my company manufactured (other than imported) the following mercury compound-added products:** Select the category(ies) and associated subcategory(ies) of products under which the reporting company manufactures mercury compound-added products. At least one category must be checked.
 - The ‘Batteries’ category includes the following subcategories: ‘Button cell (silver),’ ‘Button cell (zinc-air),’ ‘Button cell (alkaline),’ ‘Stacked button cell batteries,’ ‘Manganese oxide,’ ‘Silver oxide,’ ‘Mercuric oxide (non-button cell),’ ‘Button cell (mercuric oxide),’ ‘Button cell (zinc carbon),’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘batteries’ category and associated subcategory(ies) as confidential.
 - The ‘Dental amalgam’ category does not include any subcategories.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘dental amalgam’ category as confidential.
 - The ‘Formulated products (includes uses in cosmetics, pesticides, and laboratory chemicals)’ category includes the following subcategories: ‘Skin-lightening creams,’ ‘Lotions,’ ‘Soaps and sanitizers,’ ‘Bath oils and salts,’ ‘Preservatives (e.g. for use in vaccines for preservation),’ ‘Pharmaceuticals (including prescription and over-the-counter products),’ ‘Cleaning products (not registered as pesticides under the Federal Insecticide, Fungicide, and Rodenticide Act),’ ‘Pesticides,’ ‘Paints,’ ‘Dyes,’ ‘Reagents (e.g., catalysts, buffers, fixatives),’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘Formulated products (includes uses in cosmetics, pesticide, and laboratory chemicals)’ category and associated subcategory(ies) as confidential.
 - The ‘Lighting, lamps, bulbs’ category includes the following subcategories: ‘Liner fluorescent,’ ‘Compact fluorescent,’ ‘U-tube and circular fluorescent,’ ‘Cold cathode fluorescent,’ ‘External electrode fluorescent,’ ‘Mercury vapor,’ ‘Metal halide,’ ‘High pressure sodium,’ ‘Mercury short arc,’ ‘Neon,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.

- CBI: Check the ‘CBI’ checkbox to claim the ‘Lighting, lamps, and bulbs’ category and associated subcategory(ies) as confidential.
- The ‘Measuring instruments’ category includes the following subcategories: ‘Barometer,’ ‘Fever thermometer,’ ‘Flow meter,’ ‘Hydrometer,’ ‘Hygrometer/psychrometer,’ ‘Manometer,’ ‘Non-fever thermometer,’ ‘Pyrometer,’ ‘Sphygmomanometer,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘measuring instruments’ and associated subcategory(ies) as confidential.
- The ‘Pump seals’ category does not include any subcategories.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘pump seals’ category as confidential.
- The ‘Switches, relays, sensors, valves’ category includes the following subcategories: ‘Tilt switch,’ ‘Vibration switch,’ ‘Float switch,’ ‘Pressure switch,’ ‘Temperature switch,’ ‘Displacement relay,’ ‘Wetted reed relay,’ ‘Contact relay,’ ‘Flame sensor,’ ‘Thermostat,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘switches, relays, sensors, and valves’ category and associated subcategory(ies) as confidential.
- The ‘Miscellaneous/novelty mercury-added products’ category includes the following subcategories: ‘Wheel weights,’ ‘Wheel rotation balancers/stabilizers,’ ‘Firearm recoil suppressors,’ ‘Carburetor synchronizers,’ ‘Joint support/shock absorption bands,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘miscellaneous/novelty mercury-added products’ category and associated subcategory(ies) as confidential.
- **During the calendar year XXXX, my company distributed _____ pounds of mercury compounds in mercury compound-added products into domestic commerce:** Enter the amount of mercury compounds in mercury compound-added products distributed into domestic commerce during the specified calendar year. The entered value must be greater than or equal to zero, but less than or equal to 1,000,000,000. This question does not display if the ‘My company reported national sales data to the most recent IMERC reporting cycle’ statement is checked. This is a required field if displayed.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of mercury compounds in mercury compound-added products distributed into domestic commerce as confidential.
- **Industries of Distribution:** Select the industry(ies) of distribution to which the reporting company distributes mercury compounds in products into domestic commerce by selecting the applicable North American Industry Classification System (NAICS) code(s). Use the keyword search on the NAICS website (<https://www.census.gov/eos/www/naics/index.html>) to search for the desired industry. This field is required.
- **CBI:** Check the ‘CBI’ checkbox to claim the industry(ies) of distribution as confidential.
- **During the calendar year XXXX, my company exported _____ pounds of mercury compounds in mercury compound-added products:** Enter the amount of mercury compounds in mercury compound-added products that the reporting company has exported. The entered value must be greater than or equal to zero, but less than or equal to 1,000,000,000. This is a required field.

- **CBI:** Check the ‘CBI’ checkbox to claim the amount of exported mercury compounds in mercury compound-added products as confidential.
- **Destination Country:** Select the country(ies) to which the reporting company exports mercury compounds in mercury compound-added products. At least one country is required to be selected.
- **CBI:** Check the ‘CBI’ checkbox to claim the country(ies) to which the reporting company exports mercury compounds in mercury compound-added products as confidential.

Exhibit 4 -26 shows a screen capture of the ‘Question 8’ screen (Scroll 1):

Exhibit 4-26 Question 8 Screen (Scroll 1)

HOME Jane Doe, TEST ORGANIZATION LLC (Primary Agent/Consultant)

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Introductory Questions Question 1 **Question 2** Question 3 Question 4 Question 5
 Question 6 Question 7 **Question 8** Question 9 Question 10 Summary

Submitting Official Information

Q8. My company manufactures (other than imports) mercury compound-added products.

My company reported national sales data to the most recent IMERC reporting cycle. CBI

During the calendar year 2018, my company used a total of pounds of elemental mercury in the manufacturing of mercury compound-added products. CBI

During the calendar year 2018, my company used a total of pounds of mercury compounds in the manufacturing of mercury compound-added products. CBI

During the calendar year 2018, my company manufactured (other than imported) the following mercury compound-added products:

Category	Subcategory	CBI
<input checked="" type="checkbox"/> Batteries	Button cell, alkaline ▾	<input type="checkbox"/> CBI
<input type="checkbox"/> Dental amalgam		
<input type="checkbox"/> Formulated products (includes uses in cosmetics, pesticides, and laboratory chemicals)		
<input type="checkbox"/> Lighting, lamps, bulbs		
<input type="checkbox"/> Measuring instruments		
<input type="checkbox"/> Pump seals		
<input type="checkbox"/> Switches, relays, sensors, valves		

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Exhibit 4 -27 shows a screen capture of the ‘Question 8’ screen (Scroll 2):

Exhibit 4-27 Question 8 Screen (Scroll 2)

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Category	Subcategory
<input checked="" type="checkbox"/> Batteries	Button cell, alkaline <input type="checkbox"/> CBI
<input type="checkbox"/> Dental amalgam	
<input type="checkbox"/> Formulated products (includes uses in cosmetics, pesticides, and laboratory chemicals)	
<input type="checkbox"/> Lighting, lamps, bulbs	
<input type="checkbox"/> Measuring instruments	
<input type="checkbox"/> Pump seals	
<input type="checkbox"/> Switches, relays, sensors, valves	
<input type="checkbox"/> Miscellaneous/novelty mercury-added products	

During the calendar year 2018, my company distributed pounds of mercury compounds in mercury compound-added products into domestic commerce. CBI

Industries of Distribution: CBI

During the calendar year 2018, my company exported pounds of mercury compounds in mercury compound-added products. CBI

Destination Country: CBI

Previous
Continue

Next Step: Question 9

Save Preview Validate
Raise a Bug CDX Links CDX Helpline: (888) 890-1995

Navigation: Click the ‘Continue’ button to navigate to the subsequent screen that was checked on the ‘Introductory Questions’ screen or the ‘Summary’ screen.

4.11 Question 9

You can access the ‘Question 9’ screen by checking the ‘Q9’ checkbox and clicking the ‘Continue’ button from the ‘Question 8’ screen or the ‘Introductory Questions’ screen. You can also access this screen by clicking the ‘Question 9’ link within the navigation header.

The ‘Question 9’ screen provides fields to capture information regarding the import of mercury compound-added products.

- **My company reported national sales data to the most recent IMERC reporting cycle:** Check the checkbox to indicate that the reporting company reported national sales data of imported mercury compound-added products to the most recent IMERC reporting cycle.
- **CBI:** Check the ‘CBI’ checkbox to claim the national sales data reported to the most recent IMERC reporting cycle as confidential.
- **During the calendar year XXXX, my company imported a total of _____ pounds of mercury in compounds in mercury compound-added products:** Enter the amount of mercury in compounds in imported mercury compound-added products. The entered value

must be greater than or equal to one, but less than or equal to 1,000,000,000. This is a required field.

- **CBI:** Check the ‘CBI’ checkbox to claim the amount of mercury in compounds in mercury compound-added products as confidential.
- **During the calendar year XXXX, my company imported the following mercury compound-added products:** Check the category(ies) and associated subcategory(ies) under which the imported mercury compound-added products fall. At least one category is required to be checked.
 - The ‘Batteries’ category includes the following subcategories: ‘Button cell (silver),’ ‘Button cell (zinc-air),’ ‘Button cell (alkaline),’ ‘Stacked button cell batteries,’ ‘Manganese oxide,’ ‘Silver oxide,’ ‘Mercuric oxide (non-button cell),’ ‘Button cell (mercuric oxide),’ ‘Button cell (zinc carbon),’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘batteries’ category and associated subcategory(ies) as confidential.
 - The ‘Dental amalgam’ category does not include any subcategories.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘dental amalgam’ category as confidential.
 - The ‘Formulated products (includes uses in cosmetics, pesticides, and laboratory chemicals)’ category includes the following subcategories: ‘Skin-lightening creams,’ ‘Lotions,’ ‘Soaps and sanitizers,’ ‘Bath oils and salts,’ ‘Preservatives (e.g. for use in vaccines for preservation),’ ‘Pharmaceuticals (including prescription and over-the-counter products),’ ‘Cleaning products (not registered as pesticides under the Federal Insecticide, Fungicide, and Rodenticide Act),’ ‘Pesticides,’ ‘Paints,’ ‘Dyes,’ ‘Reagents (e.g., catalysts, buffers, fixatives),’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘Formulated products (includes uses in cosmetics, pesticides, and laboratory chemicals)’ category and associated subcategory(ies) as confidential.
 - The ‘Lighting, lamps, bulbs’ category includes the following subcategories: ‘Liner fluorescent,’ ‘Compact fluorescent,’ ‘U-tube and circular fluorescent,’ ‘Cold cathode fluorescent,’ ‘External electrode fluorescent,’ ‘Mercury vapor,’ ‘Metal halide,’ ‘High pressure sodium,’ ‘Mercury short arc,’ ‘Neon,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘Lighting, lamps, and bulbs’ category and associated subcategory(ies) as confidential.
 - The ‘Measuring instruments’ category includes the following subcategories: ‘Barometer,’ ‘Fever thermometer,’ ‘Flow meter,’ ‘Hydrometer,’ ‘Hygrometer/psychrometer,’ ‘Manometer,’ ‘Non-fever thermometer,’ ‘Pyrometer,’ ‘Sphygmomanometer,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘measuring instruments’ and associated subcategory(ies) as confidential.
 - The ‘Pump seals’ category does not include any subcategories.

- CBI: Check the ‘CBI’ checkbox to claim the ‘pump seals’ category as confidential.
- The ‘Switches, relays, sensors, valves’ category includes the following subcategories: ‘Tilt switch,’ ‘Vibration switch,’ ‘Float switch,’ ‘Pressure switch,’ ‘Temperature switch,’ ‘Displacement relay,’ ‘Wetted reed relay,’ ‘Contact relay,’ ‘Flame sensor,’ ‘Thermostat,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘switches, relays, sensors, and valves’ category and associated subcategory(ies) as confidential.
- The ‘Miscellaneous/novelty mercury-added products’ category includes the following subcategories: ‘Wheel weights,’ ‘Wheel rotation balancers/stabilizers,’ ‘Firearm recoil suppressors,’ ‘Carburetor synchronizers,’ ‘Joint support/shock absorption bands,’ and ‘Other (specify).’ At least one subcategory value is required if displayed.
 - CBI: Check the ‘CBI’ checkbox to claim the ‘miscellaneous/novelty mercury-added products’ category and associated subcategory(ies) as confidential.
- **Country of Origin:** Select the country(ies) of origin from which the reporting company imports mercury compound-added products. At least one value is required to be selected.
- **CBI:** Check the ‘CBI’ checkbox to claim the country(ies) of origin from which the reporting company imports mercury compound-added products as confidential.
- **During the calendar year XXXX, my company distributed _____ pounds of mercury compounds in products into domestic commerce:** Enter the amount of mercury compounds that has been distributed in products into domestic commerce. The entered value must be greater than or equal to zero, but less than or equal to 1,000,000,000. This question does not display if the ‘My company reported national sales data to the most recent IMERC reporting cycle’ statement is checked. This is a required field if displayed.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of mercury compounds which has been distributed in products into domestic commerce as confidential.
- **Industries of Distribution:** Select the industry(ies) of distribution to which the reporting company distributes mercury compounds in products by selecting the applicable North American Industry Classification System (NAICS) code(s). Use the keyword search on the NAICS website (<https://www.census.gov/eos/www/naics/index.html>) to search for the desired industry. At least one value is required to be selected.
- **CBI:** Check the ‘CBI’ checkbox to claim the industry(ies) of distribution as confidential.
- **During the calendar year XXXX, my company exported _____ pounds of mercury compounds in mercury-added products:** Enter the amount of mercury compounds in imported mercury-added products that the company exports. The entered value must be greater than or equal to zero, but less than or equal to 1,000,000,000. This is a required field.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of mercury compounds in mercury-added products that the reporting company has exported as confidential.
- **Destination Country:** Select the country(ies) to which the reporting company exports mercury compounds in mercury-added products. Select ‘Not Applicable’ to indicate that the company does not export mercury compounds in mercury-added products. At least one country is required to be selected.

- **CBI:** Check the ‘CBI’ checkbox to claim the destination country(ies) to which the reporting company exports mercury compounds in mercury-added products as confidential.

Exhibit 4-28 shows a screen capture of the ‘Question 9’ screen (Scroll 1):

Exhibit 4-28 Question 9 Screen (Scroll 1)

Mercury Electronic Reporting ▶ MER-20180614-10:15:54

Introductory Questions Question 1 Question 2 **Question 3** Question 4 Question 5
 Question 6 Question 7 Question 8 **Question 9** Question 10 Summary

Submitting Official Information

Q9. My company imports mercury compound-added products

My company reported national sales data to the most recent IMERC reporting cycle. CBI

During the calendar year 2018, my company imported a total of pounds of mercury in compounds in mercury compound-added products. CBI

During the calendar year 2018, my company imported the following mercury compound-added products:

Category	Subcategory
<input type="checkbox"/> Batteries	
<input type="checkbox"/> Dental amalgam	
<input type="checkbox"/> Formulated products (includes uses in cosmetics, pesticides, and laboratory chemicals)	
<input checked="" type="checkbox"/> Lighting, lamps, bulbs	Cold cathode fluorescent <input type="checkbox"/> CBI
<input type="checkbox"/> Measuring instruments	
<input type="checkbox"/> Pump seals	
<input type="checkbox"/> Switches, relays, sensors, valves	
<input type="checkbox"/> Miscellaneous/novelty mercury-added products	

Save Preview Validate Raise a Bug CDX Links CDX Helpline: (888) 890-1995

Exhibit 4-29 shows a screen capture of the ‘Question 9’ screen (Scroll 2):

Exhibit 4-29 Question 9 Screen (Scroll 2)

The screenshot shows the 'Question 9' screen with the following elements:

- Product Categories:**
 - Dental amalgam
 - Formulated products (includes uses in cosmetics, pesticides, and laboratory chemicals)
 - Lighting, lamps, bulbs (with a dropdown menu showing 'Cold cathode fluorescent' and a CBI checkbox)
 - Measuring instruments
 - Pump seals
 - Switches, relays, sensors, valves
 - Miscellaneous/novelty mercury-added products
- Country of Origin:**
 - None selected (dropdown)
 - CBI
- Industries of Distribution:**
 - None selected (dropdown)
 - CBI
- Destination Country:**
 - None selected (dropdown)
 - CBI
- Text Fields:**
 - During the calendar year 2018, my company distributed _____ pounds of mercury compounds in products into domestic commerce.
 - During the calendar year 2018, my company exported _____ pounds of mercury compounds in mercury-added products.
- Navigation:** 'Previous' and 'Continue' buttons are located at the bottom left.
- Footer:** 'Next Step: Question 10', 'Save', 'Preview', 'Validate', 'Raise a Bug', 'CDX Links', and 'CDX Helpline: (888) 890-1995' are visible.

Navigation: Click the ‘Continue’ button to navigate to the subsequent screen that was checked on the ‘Introductory Questions’ screen or the ‘Summary’ screen.

4.12 Question 10

You can access the ‘Question 10’ screen by checking the ‘Q10’ checkbox and clicking the ‘Continue’ button from the ‘Question 9’ screen or the ‘Introductory Questions’ screen. You can also access this screen by clicking the ‘Question 10’ link within the navigation header.

The ‘Question 10’ screen provides fields to capture information regarding the use of mercury compounds in a manufacturing process outside of manufacturing mercury compound-added products.

- **During the calendar year XXXX, my company used a total of _____ pounds of mercury compounds in a manufacturing process:** Enter the amount of mercury compounds used in a manufacturing process. The entered value must be greater than or equal to one, but less than or equal to 1,000,000,000. This is a required field.
- **During the calendar year XXXX, my company used mercury compounds in a manufacturing process in the following capacity for the following purposes:** Select the

processes in which mercury compounds are used. At least one process is required to be checked.

- **Process:** The ‘Process’ column displays the following values: ‘Chlorine production (e.g., mercury-cell chlor-alkali process),’ ‘Acetaldehyde production,’ ‘Sodium/potassium methylate/ethylate production,’ ‘Polyurethane/plastic production,’ ‘Production of other mercury compounds,’ and ‘Other (please specify).’ At least one process is required to be checked.
- **CBI:** Check the ‘CBI’ checkbox to claim the applicable process as confidential.
- **Use:** The ‘Use’ drop-down contains the following values: ‘Catalyst,’ ‘Reactant,’ ‘Reagent,’ ‘Cathode,’ and ‘Other.’ The drop-down is enabled when the associated process is checked. A use is required for each checked process.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of elemental mercury on-site:** Enter a range to estimate the amount of elemental mercury stored on-site during the specified calendar year. The entered values must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of elemental mercury stored on-site as confidential.
- **Check here if not applicable:** Check the checkbox to indicate that elemental mercury is not stored on-site and disable the input fields for the associated question.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of elemental mercury off-site:** Enter a range to estimate the amount of elemental mercury stored off-site during the specified calendar year. The entered values must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of elemental mercury stored off-site as confidential.
- **Check here if not applicable:** Check the checkbox to indicate that elemental mercury is not stored off-site and disable the input fields for the associated question.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of mercury compounds on-site:** Enter a range to estimate the amount of mercury compounds stored on-site during the specified calendar year. The entered values must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.
- **CBI:** Check the ‘CBI’ checkbox to claim the amount of mercury compounds stored on-site as confidential.
- **Check here if not applicable:** Check the checkbox to indicate that mercury compounds are not stored on-site and disable the input fields for the associated question.
- **During the calendar year XXXX, my company stored between _____ and _____ pounds of mercury compounds off-site:** Enter a range to estimate the amount of mercury compounds stored off-site during the specified calendar year. The entered values

must be greater than or equal to zero, but less than or equal to 1,000,000,000. The minimum and maximum range input fields are required if enabled.

- **CBI:** Check the ‘CBI’ checkbox to claim the amount of mercury compounds stored off-site as confidential.
- **Check here if not applicable:** Check the checkbox to indicate that mercury compounds are not stored off-site and disable the input fields for the associated question.
- **During the calendar year XXXX, my company distributed into domestic commerce final products that may or may not contain detectable amounts of a mercury compound as a result of a manufacturing process to the following Industries of Distribution:** Select the industry(ies) of distribution to which the reporting company distributes final products that may or may not contain detectable amounts of a mercury compounds as a result of a manufacturing process. Select the applicable North American Industry Classification System (NAICS) code(s). Use the keyword search on the NAICS website (<https://www.census.gov/eos/www/naics/index.html>) to search for the desired industry. At least one industry of distribution must be entered.
- **CBI:** Check the ‘CBI’ checkbox to claim the industry(ies) of distribution as confidential.
- **During the calendar year XXXX, my company exported final products that may or may not contain detectable amounts of a mercury compound as a result of a manufacturing process to the following Countries:** Select the destination country(ies) to which the reporting company exports final products that may or may not contain detectable amounts of a mercury compound as a result of a manufacturing process. At least one country is required to be selected.
- **CBI:** Check the ‘CBI’ checkbox to claim the destination country(ies) to which the reporting company exports final products as confidential.

Exhibit 4 -30 shows a screen capture of the ‘Question 10’ screen (Scroll 1):

Exhibit 4-30 Question 10 Screen (Scroll 1)

HOME
Jane Doe, TEST ORGANIZATION LLC (Primary Agent/Consultant)

Mercury Electronic Reporting ▶ MER-20180614-10:15:54

Introductory Questions
Question 1
Question 2
Question 3
Question 4
Question 5

Question 6
Question 7
Question 8
Question 9
Question 10
Summary

Submitting Official Information

Q10. My company uses mercury compounds in a manufacturing process (other than manufacturing mercury compound-added products)

During the calendar year 2018, my company used a total of pounds of mercury compounds in a manufacturing process. CBI

During the calendar year 2018, my company used mercury compounds in a manufacturing process in the following capacity for the following purposes:

Process	Use
<input checked="" type="checkbox"/> Chlorine production (e.g., mercury-cell chlor-alkali process) <input type="checkbox"/> CBI	<input type="text" value="Catalyst"/> <input type="checkbox"/> CBI
<input type="checkbox"/> Acetaldehyde production <input type="checkbox"/> CBI	<input type="text" value=""/> <input type="checkbox"/> CBI
<input type="checkbox"/> Sodium/potassium methylate/ethylate production <input type="checkbox"/> CBI	<input type="text" value=""/> <input type="checkbox"/> CBI
<input type="checkbox"/> Polyurethane/plastic production <input type="checkbox"/> CBI	<input type="text" value=""/> <input type="checkbox"/> CBI
<input type="checkbox"/> Production of other mercury compounds <input type="checkbox"/> CBI	<input type="text" value=""/> <input type="checkbox"/> CBI
<input type="checkbox"/> Other (please specify) <input type="checkbox"/> CBI	<input type="text" value=""/> <input type="checkbox"/> CBI

During the calendar year 2018, my company stored between and pounds of elemental mercury on-site. CBI

Check here if not applicable.

During the calendar year 2018, my company stored between and pounds of elemental mercury off-site. CBI

Check here if not applicable.

During the calendar year 2018, my company stored between and pounds of mercury compounds on-site. CBI

Save Preview Validate
Raise a Bug CDX Links CDX Helpline: (888) 890-1995

Exhibit 4 -31 shows a screen capture of the ‘Question 10’ screen (Scroll 2):

Exhibit 4-31 Question 10 Screen (Scroll 2)

The screenshot displays the 'Question 10' screen. At the top, there is a 'HOME' button and a user profile for 'Jane Doe, TEST ORGANIZATION LLC (Primary Agent/Consultant)'. The main content area contains several questions with input fields and checkboxes. The 'Continue' button is highlighted with a red box. The navigation bar at the bottom includes 'Previous', 'Continue', 'Save', 'Preview', 'Validate', 'Raise a Bug', 'CDX Links', and 'CDX Helpdesk: (888) 890-1995'.

Navigation: Click the ‘Continue’ button to navigate to the ‘Summary’ screen.

4.13 Summary

You can access the ‘Summary’ screen by clicking the ‘Continue’ button from a question screen. You can also access this screen by clicking the ‘Summary’ link within the navigation header.

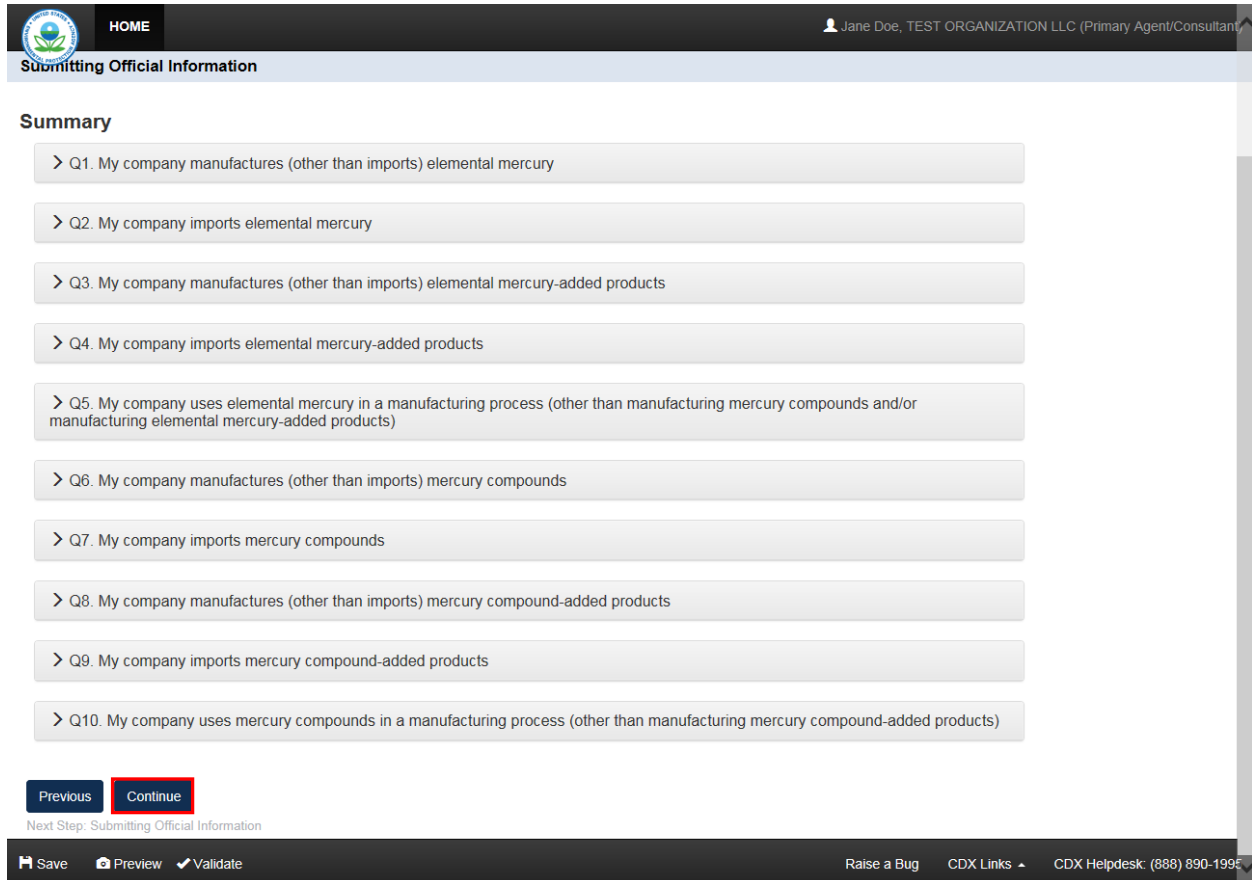
The ‘Summary’ screen provides a visual representation of all the information that has been captured within an MER form for selected question(s). Click each question title to expand the section and view entered information to verify accuracy. The ‘Expand All’ and ‘Collapse All’ links may also be used to expand and collapse all sections, respectively.

- **Q1. My company manufactures (other than imports) elemental mercury:** Click the ‘Question 1’ link at the bottom of the section to navigate back to the original page to make any necessary edits.
- **Q2. My company imports elemental mercury:** Click the ‘Question 2’ link at the bottom of the section to navigate back to the original page to make any necessary edits.
- **Q3. [My company manufactures \(other than imports\) elemental mercury-added products:](#)** Click the ‘Question 3’ link at the bottom of the section to navigate back to the original page to make any necessary edits.

- **Q4. [My company imports elemental mercury-added products](#)**: Click the ‘Question 4’ link at the bottom of the section to navigate back to the original page to make any necessary edits.
- **Q5. [My company uses elemental mercury in a manufacturing process \(other than manufacturing mercury compounds and/or manufacturing elemental mercury-added products\)](#)**: Click the ‘Question 5’ link at the bottom of the section to navigate back to the original page to make any necessary edits.
- **Q6. [My company manufactures \(other than imports\) mercury compounds](#)**: Click the ‘Question 6’ link at the bottom of the section to navigate back to the original page to make any necessary edits.
- **Q7. [My company imports mercury compounds](#)**: Click the ‘Question 7’ link at the bottom of the section to navigate back to the original page to make any necessary edits.
- **Q8. [My company manufactures \(other than imports\) mercury compound-added products](#)**: Click the ‘Question 8’ link at the bottom of the section to navigate back to the original page to make any necessary edits.
- **Q9. [My company imports mercury compound-added products](#)**: Click the ‘Question 9’ link at the bottom of the section to navigate back to the original page to make any necessary edits.
- **Q10. [My company uses mercury compounds in a manufacturing process \(other than manufacturing mercury compound-added products\)](#)**: Click the ‘Question 10’ link at the bottom of the section to navigate back to the original page to make any necessary edits.

Exhibit 4 -32 shows a screen capture of the ‘Summary’ screen:

Exhibit 4-32 Summary Screen



Navigation: If any CBI claims were made, click the ‘Continue’ button to navigate to the ‘Instructions for Substantiating Confidential Business Information (CBI) Claims’ screen. Refer to **Section 7** for information on CBI substantiation. If no CBI claims were made, refer to **Section 3.6** for the functionality available within the bottom action bar.

5 Preview

The system provides the option to preview a form at any point during the submission process. Click the ‘Preview’ link (📄), located within the bottom action bar, to see a PDF version of the form. A menu displays for you to view either the ‘Regular’ or the ‘Sanitized’ version of the PDF. After you choose either the ‘Regular’ or ‘Sanitized’ PDF, the application displays a confirmation message and generates a draft, watermarked PDF version of the form.

The watermark reads ‘Not for Submission’ and displays across each page in the background. The form preview displays the entire form in a printable format. The preview functionality provides the flexibility to track the status of the form and see the entire form in a single viewpoint.

Exhibit 5 -33 shows a screen capture of the ‘Preview’ links:

Exhibit 5-33 Preview

Mercury Electronic Reporting ▶ **MER-20180614-10:15:54**

Introductory Questions Summary Submitting Official Information

Introductory Questions

- Submission Alias

MER-20180614-10:15:54

Please do not include CBI information in the Submission Alias field.

The Mercury Electronic Reporting (MER) rule, under the Toxic Substances Control Act (TSCA), requires any person who manufactures (including imports) mercury or mercury-added products, or otherwise intentionally uses mercury in a manufacturing process to report quantitative and qualitative data to the Environmental Protection Agency. The law defines mercury as meaning elemental mercury and a mercury compound. In accordance with section 8(b) of TSCA, information collected under this reporting application will be used in support of a triennial publication of the supply, uses, and trade of mercury in the United States.

Read the TSCA MER requirements in the Code of Federal Regulations (40 CFR Part ###).

Check all applicable statements

- Elemental Mercury**
 - Q1: My company manufactures (other than imports) elemental mercury
 - Q2: My company imports elemental mercury
 - Q3: My company manufactures (other than imports) elemental mercury-added products
 - Q4: My company imports elemental mercury-added products
 - Q5: My company uses elemental mercury in a manufacturing process (other than manufacturing mercury compounds and/or manufacturing elemental mercury-added products)
- Mercury Compounds**
 - Q6: My company manufactures (other than imports) mercury compounds
 - Q7: My company imports mercury compounds
 - Q8: My company manufactures (other than imports) mercury compound-added products
 - Q9: My company imports mercury compound-added products
 - Regular PDF is mercury compounds in a manufacturing process (other than manufacturing mercury compound-added products)
 - Sanitized PDF

Save Preview Validate Raise a Bug CDX Links CDX Helpdesk: (888) 890-1995

Exhibit 5 -34 shows a screen capture for the 'Preview' of the MER form:

Exhibit 5-34 Preview Mercury Electronic Reporting Form PDF

MERCURY ELECTRONIC REPORTING						
Submission Date:				Revised Date:		
Submitting Official Information						
Name of Authorized Official	(first)		(middle)		(last)	CBI: <input type="checkbox"/>
Company Name			Position			
Email Address			Phone Number			
Mailing Address 1						
Mailing Address 2						
City		State		Postal Code		
Country						
Technical Contact						
Name of Authorized Official	(first)		(middle)		(last)	CBI: <input type="checkbox"/>
Company Name			Position			
Email Address			Phone Number			
Mailing Address 1						
Mailing Address 2						
City		State		Postal Code		
Country						
Question 1: My company manufactures (other than imports) elemental mercury						CBI
<input type="checkbox"/> My company reported amount of manufactured mercury in the most recent CDR reporting cycle.						<input type="checkbox"/>
During the calendar year 2018 my company manufactured (other than imported) a total of pounds of elemental mercury.						<input type="checkbox"/>
During the calendar year 2018 my company stored between and pounds of elemental mercury on-site. Check here if not applicable. <input type="checkbox"/>						<input type="checkbox"/>
During the calendar year 2018 my company stored between and pounds of elemental mercury off-site. Check here if not applicable. <input type="checkbox"/>						<input type="checkbox"/>
During the calendar year 2018 my company distributed pounds of elemental mercury into domestic commerce.						<input type="checkbox"/>
Industries of Distribution:						<input type="checkbox"/>
Question 2: My company imports elemental mercury						CBI
<input type="checkbox"/> My company reported amount of imported mercury in the most recent CDR reporting cycle.						<input type="checkbox"/>
During the calendar year 2018, my company imported a total of pounds of elemental mercury.						<input type="checkbox"/>
Country of Origin:						<input type="checkbox"/>
During the calendar year 2018, my company stored between and pounds of elemental mercury on-site. Check here if not applicable. <input type="checkbox"/>						<input type="checkbox"/>
During the calendar year 2018, my company stored between and pounds of elemental mercury off-site. Check here if not applicable. <input type="checkbox"/>						<input type="checkbox"/>
During the calendar year 2018, my company distributed pounds of elemental mercury into domestic commerce.						<input type="checkbox"/>
Industries of Distribution:						<input type="checkbox"/>
Question 3: My company manufactures (other than imports) elemental mercury-added products						CBI
<input type="checkbox"/> My company reported national sales data to the most recent IMERC reporting cycle.						<input type="checkbox"/>

6 Validate

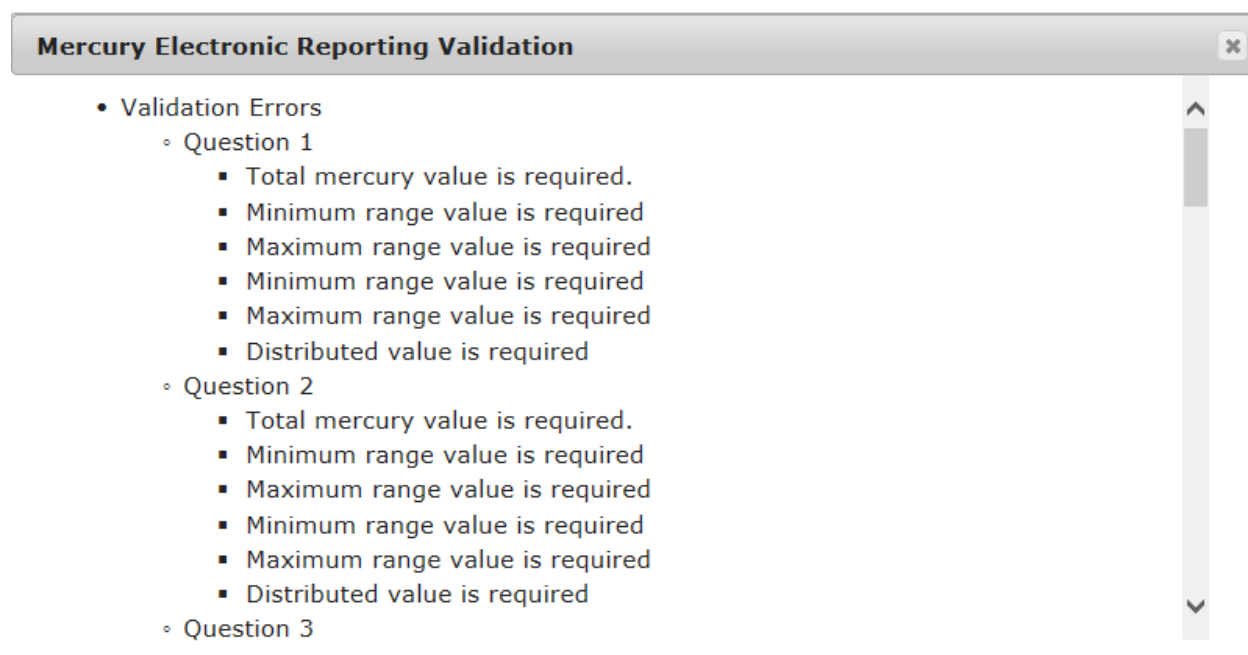
You can click the ‘Validate’ link at any stage of completing a Mercury Electronic Reporting form. The ‘Mercury Electronic Reporting Validation’ window displays when you click the ‘Validate’ link. Disable the pop-up blocker within your internet browser so that the ‘Mercury Electronic Reporting Validation’ window displays correctly. The ‘Mercury Electronic Reporting Validation’ window displays a report of all validation errors and warning messages. During the validation process, the application validates each screen of the Mercury Electronic Reporting form to find missing and invalid data.

Validation Errors: Errors can be fixed by clicking the error link. The links will display the *Screen Title Name* (e.g., Question 1) and the associated error. After you click a link, the main application screen will display the section where the error occurred so you can easily fix the error. Once you have fixed the error(s), click the ‘Validate’ link again to refresh the ‘Mercury Electronic Reporting Validation’ window. If the information you fixed passes validation, the error will be removed from the ‘Mercury Electronic Reporting Validation’ window. You must fix all validation errors to submit the form to CDX successfully.

Click the ‘X’ button located at the upper right-hand corner of the window to close the ‘Mercury Electronic Reporting Validation’ window.

Exhibit 6 -35 shows a screen capture for the ‘Mercury Electronic Reporting Validation’ window:

Exhibit 6-35 Mercury Electronic Reporting Validation Window



7 CBI Substantiation

EPA modified the electronic reporting applications for TSCA submissions to accept CBI substantiations for CBI claims made during the creation of electronic submissions. Other than information exempt from substantiation under TSCA Section 14(c)(2), users who wish to assert CBI claims for data within a submission must substantiate those claims at the time of submission as required by TSCA Section 14(c)(3).

7.1 Instructions for Substantiating Confidential Business Information (CBI) Claims Screen

You can access the ‘Instructions for Substantiating Confidential Business Information (CBI) Claims’ screen by claiming information as CBI within a form and clicking the ‘Instructions for Substantiating CBI Claims’ link within the navigation header. The ‘Instructions for Substantiating Confidential Business Information (CBI) Claims’ screen will not generate until a CBI claim is made within a submission. Information claimed CBI must either be substantiated or claimed exempt pursuant to TSCA Section 14(c)(2) at the time of submission.

To substantiate a CBI claim, upload documentation asserting your claim(s). You may also opt-out of substantiation if, for example, you believe your CBI claim is exempt under TSCA Section 14(c)(2). Common exemption reasons can be found at <https://www.epa.gov/tsca-cbi/what-information-include-cbi-substantiations>. To opt-out of substantiation at the time of submission, all CBI claims within a submission must be exempt.

- **Substantiation Opt-Out:** Certain data claimed CBI may be exempt from substantiation at the time of submission. If all information contained within the submission was previously substantiated or you believe it to be exempt pursuant to TSCA Section 14(c)(2), check the ‘Substantiation Opt-Out’ checkbox to enable the ‘Substantiation Opt-Out Reasoning’ text box. If a substantiation document is uploaded, checking the ‘Substantiation Opt-Out’ checkbox removes the uploaded attachments. Either a substantiation opt-out reason or CBI substantiation document must be provided if a CBI claim is made in a submission.
- **Substantiation Opt-Out Reasoning:** Enter information explaining why you believe your CBI claim(s) to be exempt from substantiation. Either a substantiation opt-out reason within the text box or CBI substantiation document must be provided if a CBI claim is made in a submission.
- **Attach CBI Substantiation Document:** Click the ‘Attach CBI Substantiation Document’ link to search your local machine and upload a file that contains your CBI substantiation. To overwrite an uploaded file, click the ‘Edit’ link to search for and upload a new file. Delete uploaded files to enable the ‘Substantiation Opt-Out’ checkbox. Either a substantiation opt-out reason or CBI substantiation document must be provided if a CBI claim is made in a submission.

If you are unfamiliar with substantiating CBI claims or require assistance preparing substantiation documents, EPA offers a link to templates and other information for substantiating CBI claims on the ‘Instructions for Substantiating Confidential Business Information (CBI) Claims’ screen. It is suggested that you right-click the link and open in a new tab or new window so you do not leave your submission as this may affect your saved data.

The 'Instructions for Substantiating Confidential Business Information (CBI) Claims' screen is under development.

Navigation: Click the 'Validate' link located in the bottom action bar to validate the form. Click the 'Save' link located in the bottom action bar to save the overall form. Click the 'Preview' link to generate a PDF preview of the form.

7.2 Attach Documents for CBI Substantiation

The 'Attach CBI Substantiation Document' link displays on the 'Instructions for Substantiating CBI Claims' screen, and provides functionality for you to attach supporting documents where needed. Click the 'Attach CBI Substantiation Document' link displayed on a screen to access the 'Attach Documents for CBI Substantiation' pop-up window. You can attach a file and enter a description, number of pages, and indicate CBI status.

The system allows you to claim an uploaded document as CBI. If you claim a document as CBI, the system requires you to upload a sanitized version of the attached document. If you wish to change a CBI attachment to be non-CBI by deselecting the 'CBI' checkbox, a warning appears to notify you that deselecting the 'CBI' checkbox will delete the sanitized file. If you neglect to populate a required field and click the 'OK' button, an error message will display to indicate the missing field and the application will delete the previously attached file.

After you upload a document to be attached, the 'Attach Documents for CBI Substantiation' window will close and the document's information will display in a table format on the screen. Depending on the screen, the attachment table may display the section of the page the file is associated with, the file name and file extension of the document, the number of pages in the document, and if the document was claimed CBI. The system allows you to delete unwanted documents by clicking the 'Delete' link. To view, open, or edit previously attached documents, click the 'Edit' link.

- **Type:** Select 'CBI Substantiation' from the drop-down menu of the document that you upload. This is a required field.
- **Attachment:** Click the 'Browse' button to generate the 'File Upload' window to search for a document on your hard drive.
- **Description:** Enter a description associated with the attached document. Submitters should not include any CBI information in the document description. This is a required field.
- **Number of Pages:** Enter the number of pages in a document. This is a required field.
- **Check to claim the attachment as CBI:** Check the 'CBI' checkbox to claim the attached document as confidential. Un-checking the 'CBI' checkbox for a CBI document generates a warning notifying you that un-checking the CBI claim will delete the sanitized file.
- **Sanitized Attachment:** Click the 'Browse' button to generate the 'File Upload' window to search for a document on your hard drive. For any attached document claimed as CBI, you will be required to attach a sanitized version of the document.
- **Cancel:** Click the 'Cancel' button to cancel the attach document process.
- **OK:** Click the 'OK' button to attach and link the document uploaded on the 'Attach Documents for CBI Substantiation' window to the form. If a field is missing, a warning

message will display notifying you that all attachments must be re-attached and the missing field must be populated.

The 'Attach Documents for CBI Substantiation' window is under development.

Navigation: Click the 'Cancel' button or 'X' icon in the upper right-hand corner to cancel the document attachment process. Click the 'OK' button to attach the document to the form and navigate back to the 'Instructions for Substantiating CBI Claims' screen from which the document attachment process was initiated.

8 Submit to EPA via CDX

As a Primary Agent/Consultant, you have the ability to submit amendments. You can save your form at any point during the data entry process and return to that same form at any point in the future.

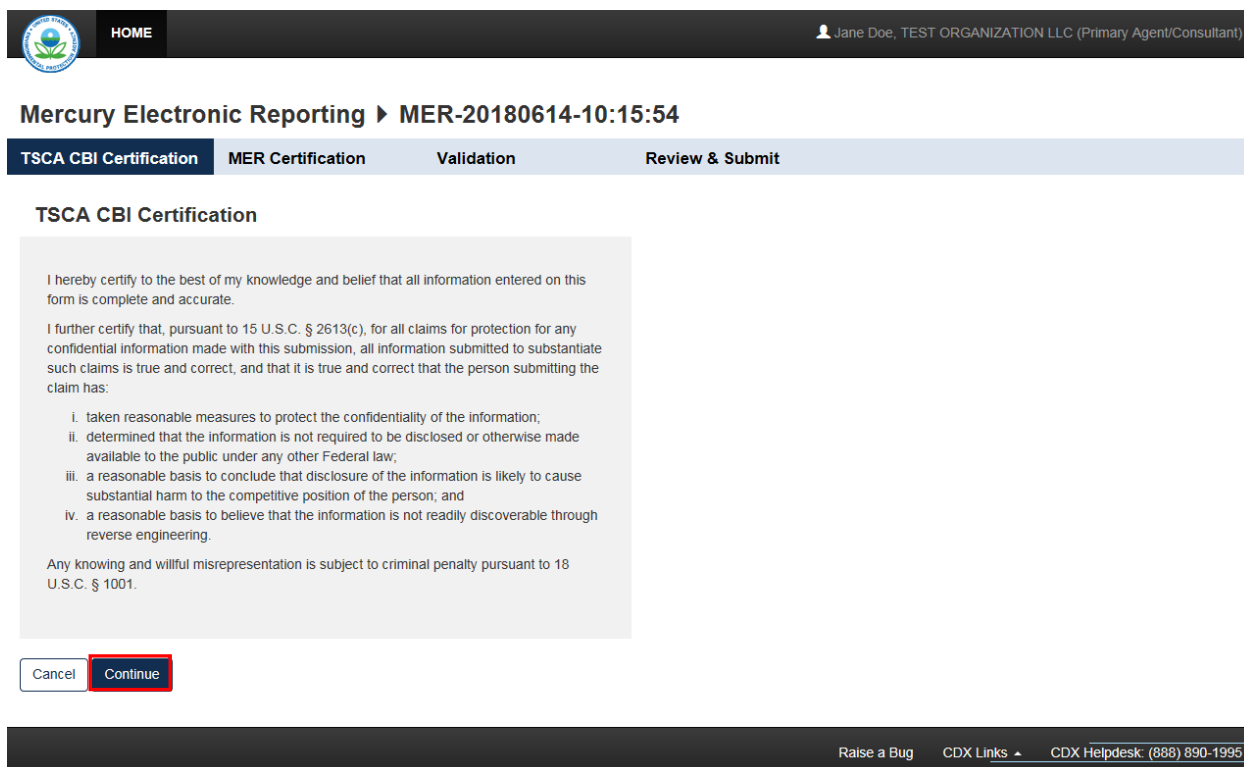
Once you complete all required information and correct all items failing validation, the system will allow the Mercury Electronic Reporting form to be successfully submitted.

8.1 TSCA CBI Certification

Click the ‘Start Submission Process’ button from the ‘Submitting Official Information’ or ‘Instructions for Substantiating CBI Claims’ screen to access the ‘TSCA CBI Certification’ page.

Exhibit 8 -36 shows a screen capture of the ‘TSCA CBI Certification’ screen:

Exhibit 8-36 TSCA CBI Certification Screen



The screenshot shows the Mercury Electronic Reporting interface. At the top, there is a navigation bar with a 'HOME' button and a user profile for 'Jane Doe, TEST ORGANIZATION LLC (Primary Agent/Consultant)'. Below this, the main heading is 'Mercury Electronic Reporting ▶ MER-20180614-10:15:54'. A secondary navigation bar contains four tabs: 'TSCA CBI Certification' (which is active), 'MER Certification', 'Validation', and 'Review & Submit'. The main content area is titled 'TSCA CBI Certification' and contains a certification form. The form text reads: 'I hereby certify to the best of my knowledge and belief that all information entered on this form is complete and accurate. I further certify that, pursuant to 15 U.S.C. § 2613(c), for all claims for protection for any confidential information made with this submission, all information submitted to substantiate such claims is true and correct, and that it is true and correct that the person submitting the claim has: i. taken reasonable measures to protect the confidentiality of the information; ii. determined that the information is not required to be disclosed or otherwise made available to the public under any other Federal law; iii. a reasonable basis to conclude that disclosure of the information is likely to cause substantial harm to the competitive position of the person; and iv. a reasonable basis to believe that the information is not readily discoverable through reverse engineering. Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 U.S.C. § 1001.' At the bottom of the form are two buttons: 'Cancel' and 'Continue'. The 'Continue' button is highlighted with a red border. At the very bottom of the page, there is a footer with links for 'Raise a Bug', 'CDX Links', and 'CDX Helpdesk: (888) 890-1995'.

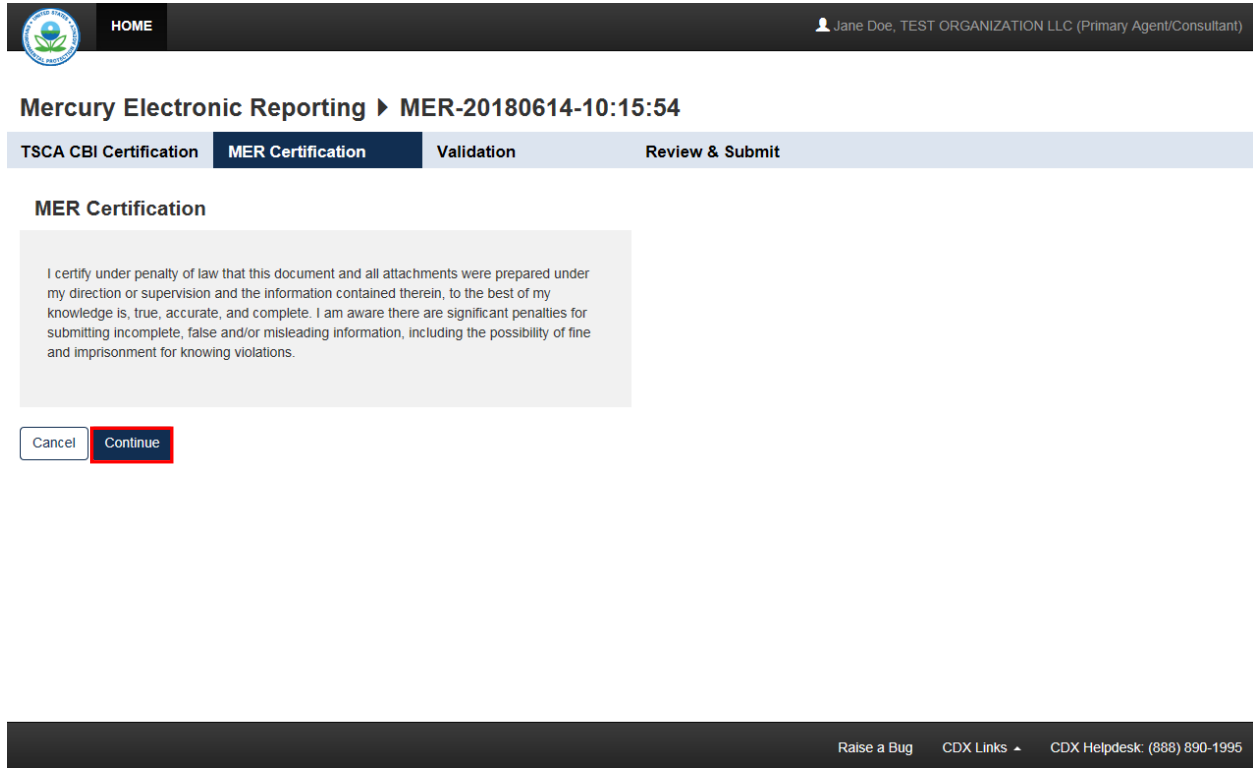
Navigation: Click the ‘Continue’ button to navigate to the ‘MER Certification’ screen.

8.2 MER Certification

Click the ‘Continue’ button from the ‘TSCA CBI Certification’ screen to access the ‘MER Certification’ screen.

Exhibit 8 -37 shows a screen capture of the ‘MER Certification’ screen:

Exhibit 8-37 MER Certification Screen



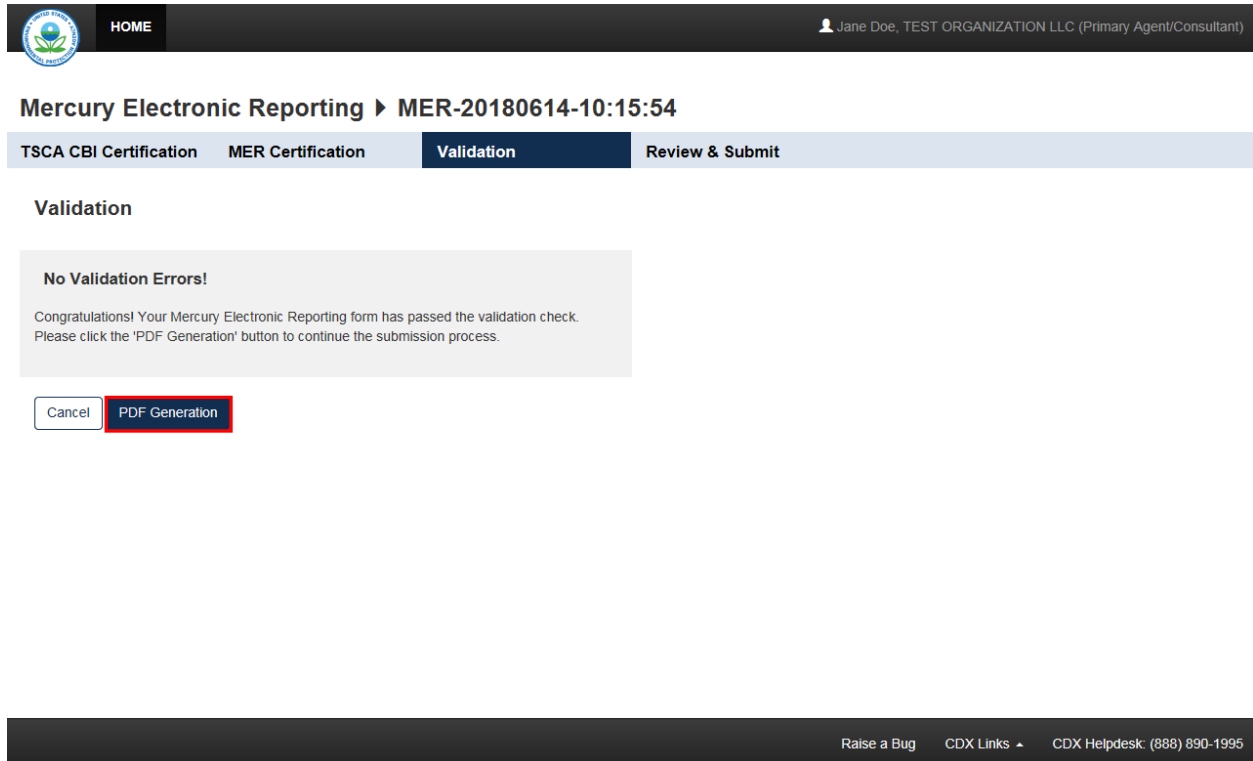
Navigation: Click the ‘Continue’ button to navigate to the ‘Mercury Electronic Reporting Validation’ screen.

8.3 Mercury Electronic Reporting Validation

Click the ‘Continue’ button from the ‘MER Certification’ screen to access the ‘Mercury Electronic Reporting Validation’ screen.

Exhibit 8-38 shows a screen capture of the ‘Mercury Electronic Reporting Validation’ screen:

Exhibit 8-38 Mercury Reporting Validation Screen



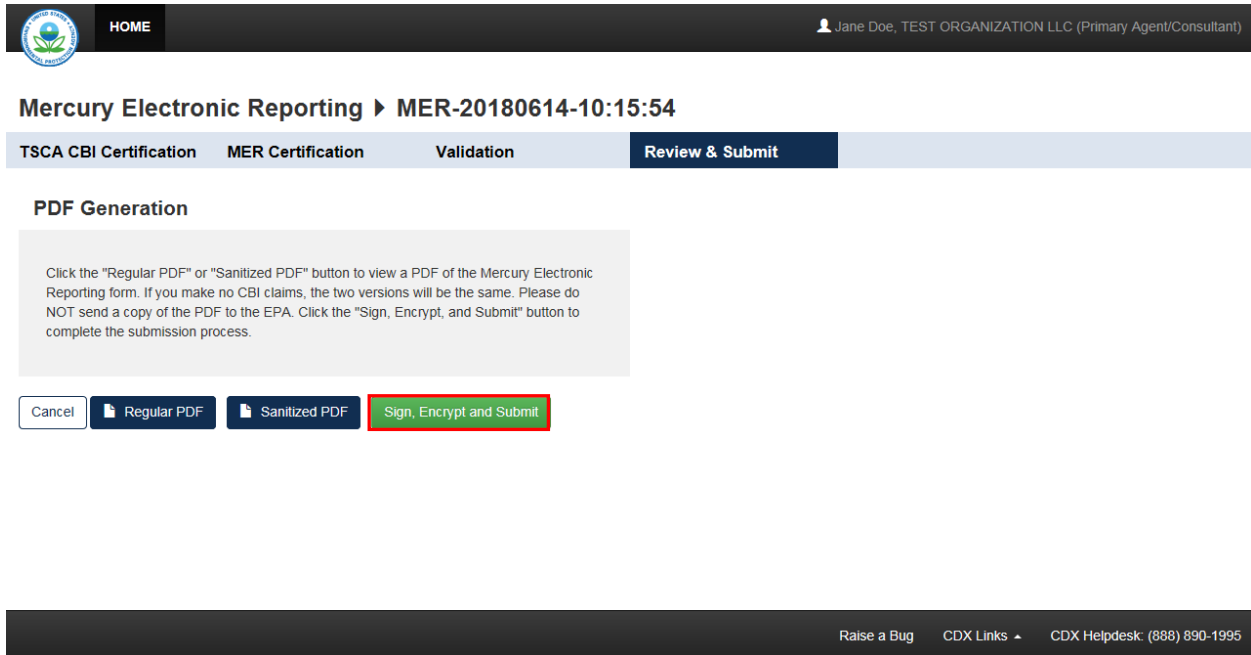
Navigation: Click the ‘PDF Generation’ button to navigate to the ‘PDF Generation’ screen.

8.4 Mercury Electronic Reporting PDF Generation

Click the ‘PDF Generation’ button from the ‘Mercury Electronic Reporting Validation’ screen to access the ‘PDF Generation’ screen.

Exhibit 8 -39 shows a screen capture of the ‘PDF Generation’ screen:

Exhibit 8-39 PDF Generation Screen



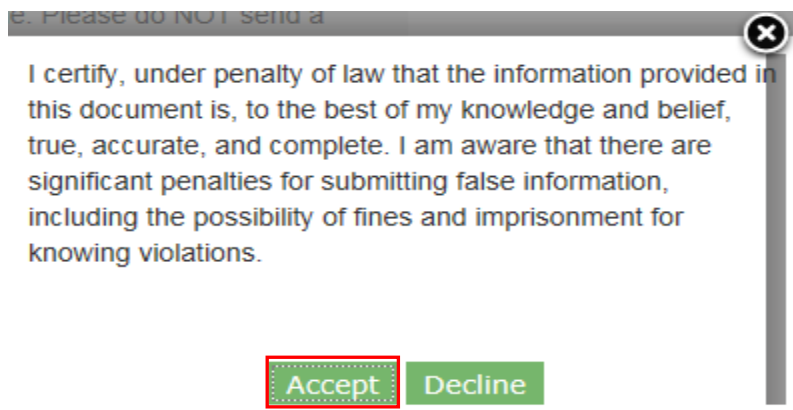
Navigation: Click the ‘Regular PDF’ button to view the regular version of the MER PDF in a separate window. Click the ‘Sanitized PDF’ button to view the sanitized version of the MER PDF. Click the ‘Sign, Encrypt and Submit’ button to begin the CROMERR certification process.

8.5 CROMERR Certification

Click the ‘Sign, Encrypt and Submit’ button from the ‘PDF Generation’ screen to generate the ‘CROMERR Certification’ pop-up window.

Exhibit 8 -40 shows a screen capture of the ‘CROMERR Certification’ window:

Exhibit 8-40 CROMERR Certification Window



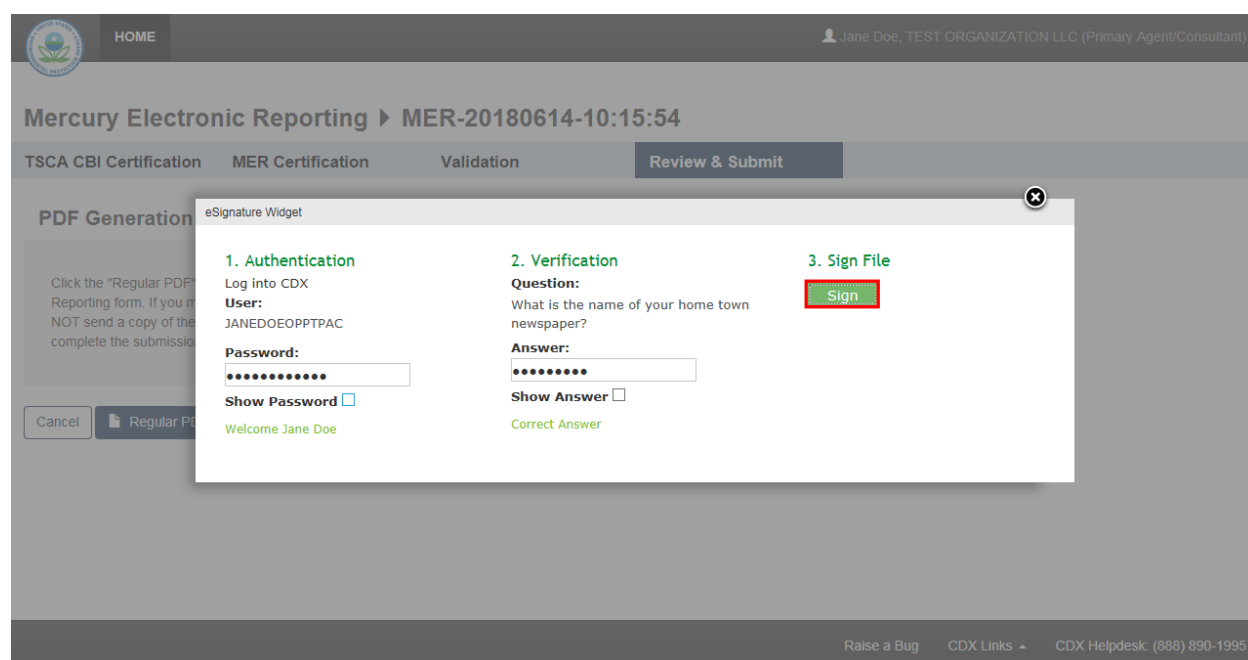
Navigation: Click the ‘Accept’ button to agree to the certification statement and generate the ‘eSignature Widget.’

8.6 eSignature Widget

Click the ‘Accept’ button on the ‘CROMERR Certification’ window to accept the certification statement and generate the ‘eSignature Widget.’ The ‘eSignature Widget’ will prompt for the CDX login password and an answer to one of your security questions registered within CDX. Then click the ‘Sign’ button on the ‘eSignature Widget’ to navigate to the ‘Submission Finished’ screen.

Exhibit 8 -41 shows a screen capture of the ‘eSignature Widget’ window:

Exhibit 8-41 eSignature Widget



Navigation: Click the ‘Sign’ button on the ‘eSignature Widget’ to navigate to the ‘Submission Finished’ screen.

8.7 Submission Finished


Click the ‘Sign’ button within the ‘eSignature Widget’ to navigate to the ‘Submission Finished’ screen.

The ‘Submission Finished’ screen is under development.

Navigation: Click the ‘Home’ button to confirm the submission of the form and navigate back to the Mercury Electronic Reporting ‘Home’ screen.

9 Download Copy of Record

To download a Copy of Record, navigate to the Mercury Electronic Reporting 'Home' screen and locate a form alias for which you have successfully completed a submission and which has a status of 'Completed.'

Click the 'Copy of Record' icon () from the 'Submission History' table of the Mercury Electronic Reporting 'Home' screen for the desired submission to navigate to the 'Enter Passphrase' screen. The 'Enter Passphrase' screen requires you to enter the passphrase originally associated with the form. If the passphrase is entered correctly, you will view the 'CROMERR Certification' message where you can acknowledge the certification. Once you accept the certification, the 'eSignature Widget' displays where you provide the correct CDX password, answer the 20-5-1 question, and click the 'Sign' button. Then the copy of record .zip file generates on the current page.

The 'Download Copy of Record' screen is under development.

10 EPA Communications

EPA may send electronic communications related to specific CDX submissions. In the event EPA sends an electronic communication, the original submitter will receive a notification to both their registered email address and inbox within CDX. The notification will inform the user that there is a new, submission-specific communication available from EPA.

Shows a screen capture of a sample email notification from CDX:

This is under development.

11 Create An Amendment

The ability to unlock submissions to create an amendment is limited. Contact EPA at to unlock the completed submission.

This process is under development.