

Part VI - SUBSTANTIATION FOR SPECIFIC CHEMICAL IDENTITY CBI CLAIM - Supplemental Filing	
This substantiation contains CBI: Yes <input type="checkbox"/> No <input type="checkbox"/>	
<p>Exemption 1. I completed the voluntary substantiation process for my specific chemical identity CBI claim by submitting responses to all substantiation questions in my original Notice of Activity Form A submission. I am now supplementing my substantiation by only addressing Questions 7 and 8.</p> <p><i>If you check this box, skip Questions 1-6 and provide responses to Questions 7 and 8.</i></p>	<input type="checkbox"/>
Click or tap here to enter text.	
<p>Exemption 2. I previously substantiated my specific chemical identity CBI claim in another submission to EPA and wish to rely on that previous submission to fulfill my substantiation requirement.</p> <p><i>Note that to qualify for this exemption, the previous substantiation must have been submitted to EPA not more than five years before the deadline for completing this form.</i></p> <p><i>If you check this box, enter the submission date; submission type; and case number, transaction ID, or equivalent identifier for the previous submission that contained the substantiation. Answer no other substantiation questions on this form.</i></p>	<input type="checkbox"/>
Click or tap here to enter text.	
<p>1. Will disclosure of the information claimed as confidential likely cause substantial harm to your business's competitive position? If you answered yes, describe the substantial harmful effects that would likely result to your competitive position if the information is disclosed, including but not limited to how a competitor could use such information and the causal relationship between the disclosure and the harmful effects.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
<p>2. To the extent your business has disclosed the information to others (both internally and externally), has your business taken precautions to protect the confidentiality of the disclosed information?</p> <p>If yes, please explain and identify the specific measures, including but not limited to internal controls, that your business has taken to protect the information claimed as confidential.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	

<p>3. (A) Is any of the information claimed as confidential required to be publicly disclosed under any other Federal law? If yes, please explain.</p> <p>(B) Does any of the information claimed as confidential otherwise appear in any public documents, including (but not limited to) safety data sheets; advertising or promotional material; professional or trade publications; state, local, or Federal agency files; or any other media or publications available to the general public? If yes, please explain why the information should be treated as confidential.</p> <p>(C) Does any of the information claimed as confidential appear in one or more patents or patent applications? If yes, please provide the associated patent number or patent application number (or numbers) and explain why the information should be treated as confidential.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p>4. Is the claim of confidentiality intended to last less than 10 years? If yes, please indicate the number of years (between 1-10 years) or the specific date/occurrence after which the claim is withdrawn.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p>5. Has EPA, another federal agency, or court made any confidentiality determination regarding information associated with this chemical substance? If yes, please provide the circumstances associated with the prior determination, whether the information was found to be entitled to confidential treatment, the entity that made the decision, and the date of the determination.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p>6. Is the confidential chemical substance publicly known (including by your competitors) to have ever been offered for commercial distribution in the United States? If yes, please explain why the specific chemical identity should still be afforded confidential status (e.g., the chemical substance is publicly known only as being distributed in commerce for research and development purposes, but no other information about the current commercial distribution of the chemical substance in the United States is publicly available).</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p>7. Does this particular chemical substance leave the site of manufacture (including import) or processing in any form, e.g., as a product, effluent, or emission? If yes, please explain what measures have been taken, if any, to guard against the discovery of its identity.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p>8. If the chemical substance leaves the site in a form that is available to the public or your competitors, can the chemical identity be readily discovered by analysis of the substance (e.g., product, effluent, or emission), in light of existing technologies and any costs, difficulties, or limitations associated with such technologies? Please explain why or why not.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p>CERTIFICATION</p>	

NOA Form A: Additional Substantiation Questions Mockup – February 18, 2020

I certify that all claims for confidentiality made or sought to be maintained with this submission are true and correct, and all information submitted herein to substantiate such claims is true and correct. I further certify that it is true and correct that:

(i) My company has taken reasonable measures to protect the confidentiality of the information;

(ii) I have determined that the information is not required to be disclosed or otherwise made available to the public under any other Federal law;

(iii) I have a reasonable basis to conclude that disclosure of the information is likely to cause substantial harm to the competitive position of my company; and

(iv) I have 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.

Signature of authorized official		Date	
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Paperwork Reduction Action Notice: The public reporting and record keeping burden for this collection is estimated to average 7.053 hours per response for amending upfront substantiation, 5.063 hours per response for referencing a previous substantiation, and 39.243 hours per response for providing full substantiation, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This is a mandatory collection pursuant to 40 CFR 710. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Number of this collection is 2070-0210. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to Director, Collection Strategies Division (Mail Code 2822T), U.S. Environmental Protection Agency, Washington, DC 20460. Include the OMS control number in any correspondence, but do not submit the form or report to this address. The form should be submitted in accordance with the instructions for the form."